

DMR Reporting Violations on the NPDES Noncompliance Report (NNCR)

Tuesday, April 21st, 2026



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Training Goals

- Understand when DMR reporting violations are generated
- Learn about the underlying rules supporting DMR reporting violations on the quarterly NNCR
- Understand how to find more information and where to direct questions after today's training

This presentation is an advanced training and assumes you have attended the Quarterly NNCR training. If not, you can view a recorded training on the [ECHO Training](#) page.

Agenda

1. Violation generation
2. Violation detections (category I vs II)
3. Violation resolutions
4. Quarterly report criteria
5. Demonstration and practice search
6. Questions

Violation Generation



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What is a DMR Reporting violation?

- NPDES permittees are required to periodically report their self-monitoring results on discharge monitoring reports (DMRs)
- DMR reporting violations are generated when the results from the self-monitoring have not been reported within 30 days of the due date
- Violations are generated for missing DMR values and when a noncompliant no data indicator (NODI) was reported

No Data Indicator (NODI)

- A NODI is a unique code/description that indicates the reason “No Discharge” or “No Data” was reported on a DMR
- A NODI can be reported on a DMR when a permittee does not have a numeric DMR value to report for a parameter for an entire monitoring period

DMR Reporting Violation Codes

There are two DMR reporting violations:

- D80: DMR, Monitor Only – Overdue
- D90: DMR, Limited – Overdue

DMR Reporting Violation Generation

DMR reporting violations are uniquely identified by the following set of data:

- NPDES ID
- Permitted Feature (outfall)
- Limit Set
- Monitoring Period End Date
- Parameter
- Monitoring Location
- Value Type (concentration or quantity)

Category I versus II



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Violation Category

40 CFR §123.45 requires every violation to be designated as a Category I or II violation. The regulation includes specific criteria for Category I violations. All violations that do not meet Category I criteria must be designated Category II.

For DMR reporting violations, the Category I criteria is failure to submit a required report within 30 days of the due date.

NNCR Interpretation

- An “entire DMR” is defined by the grouping of DMR value(s) by NPDES ID, permitted feature, and monitoring period end date.
- If an entire DMR is missing* 31 days after the due date, each of the DMR reporting violations will be designated as Category I violation.
- If less than an entire DMR is missing* 31 days after the due date, each of the DMR reporting violations will be designated as Category II violation.

*Missing includes both no data reported and noncompliant NODIs

Violation Detection

DMR reporting violations have 4 possible detections:

Detection Code	Detection Description	Violation Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Category I Examples



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DISCHARGE MONITORING REPORT (DMR)

NAME
ADDRESS

PERMIT NUMBER	DISCHARGE NUMBER

FACILITY
LOCATION

MONITORING PERIOD							
	YEAR	MO	DAY		YEAR	MO	DAY
FROM				TO			

NOTE: Read instructions before

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
	SAMPLE										
	PERMIT REQUIREMENT										
	SAMPLE										
	PERMIT REQUIREMENT										
	SAMPLE										
	PERMIT REQUIREMENT										
	SAMPLE										
	PERMIT REQUIREMENT										
	SAMPLE										
	PERMIT REQUIREMENT										
	SAMPLE										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE AREA NUMBER	DATE YEAR MO DAY
	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020




Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	10
No Data	10
Noncompliant NODIs	0
Numeric Value or Compliant NODIs	0

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2					
Parameter 3					
Parameter 4					
Parameter 5					

Colored cell represents a required DMR value

Data Reported

-  No Data
-  Noncompliant NODI
-  Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross




Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	10
No Data	10
Noncompliant NODIs	0
Numeric Value or Compliant NODIs	0

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1	D1A				D1A
Parameter 2	D1A				D1A
Parameter 3	D1A				D1A
Parameter 4	D1A				D1A
Parameter 5	D1A				D1A

Data Reported

-  No Data
-  Noncompliant NODI
-  Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross




Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	1
No Data	1
Noncompliant NODIs	0
Numeric Value or Compliant NODIs	0

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					

Data Reported

-  No Data
-  Noncompliant NODI
-  Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross




Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	1
No Data	1
Noncompliant NODIs	0
Numeric Value or Compliant NODIs	0

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1				D1A	

Data Reported

-  No Data
-  Noncompliant NODI
-  Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	9
No Data	2
Noncompliant NODIs	7
Numeric Value or Compliant NODIs	0

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2					
Parameter 3					

Data Reported

- No Data
- Noncompliant NODI
- Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross




Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	9
No Data	2
Noncompliant NODIs	7
Numeric Value or Compliant NODIs	0

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1	D1B			D1B	D1B
Parameter 2	D1B			D1B	D1B
Parameter 3	D1B			D1A	D1A

Data Reported

-  No Data
-  Noncompliant NODI
-  Numeric Value/Compliant NODI

Category II Examples



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Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	8
No Data	6
Noncompliant NODIs	0
Numeric Value or Compliant NODIs	2

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2					
Parameter 3					
Parameter 4					

Data Reported

- No Data
- Noncompliant NODI
- Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	8
No Data	6
Noncompliant NODIs	0
Numeric Value or Compliant NODIs	2

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2	D2C			D2C	
Parameter 3	D2C			D2C	
Parameter 4	D2C			D2C	

Data Reported

- No Data
- Noncompliant NODI
- Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	6
No Data	1
Noncompliant NODIs	3
Numeric Value or Compliant NODIs	2

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2					
Parameter 3					

Data Reported

- No Data
- Noncompliant NODI
- Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	6
No Data	1
Noncompliant NODIs	3
Numeric Value or Compliant NODIs	2




Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2	D2D			D2D	
Parameter 3	D2D			D2C	

Data Reported

- No Data
- Noncompliant NODI
- Numeric Value/Compliant NODI

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II



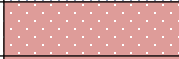



Required DMR Values	10
No Data	4
Noncompliant NODIs	4
Numeric Value or Compliant NODIs	2

Data Reported	
	No Data
	Noncompliant NODI
	Numeric Value/Compliant NODI

Permit Number: DC1234567
 Discharge Number: 001 – A
 Monitoring Location: 1 - Effluent Gross
 Monitoring Period End Date: 1/31/2020

two limit sets







Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2					
Parameter 3					

Permit Number: DC1234567
 Discharge Number: 001 – B
 Monitoring Location: 1 - Effluent Gross
 Monitoring Period End Date: 1/31/2020




two limit sets



Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2					

Code	Description	Category
D1A	DMR Reporting (Entire) – No Data	I
D1B	DMR Reporting (Entire) – NODI	I
D2C	DMR Reporting (Partial) – No Data	II
D2D	DMR Reporting (Partial) – NODI	II

Required DMR Values	10
No Data	4
Noncompliant NODIs	4
Numeric Value or Compliant NODIs	2



Data Reported	
	No Data
	Noncompliant NODI
	Numeric Value/Compliant NODI

Permit Number: DC1234567

Discharge Number: 001 – A

Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1					
Parameter 2	D2D			D2D	
Parameter 3	D2D			D2D	

Permit Number: DC1234567

Discharge Number: 001 – B

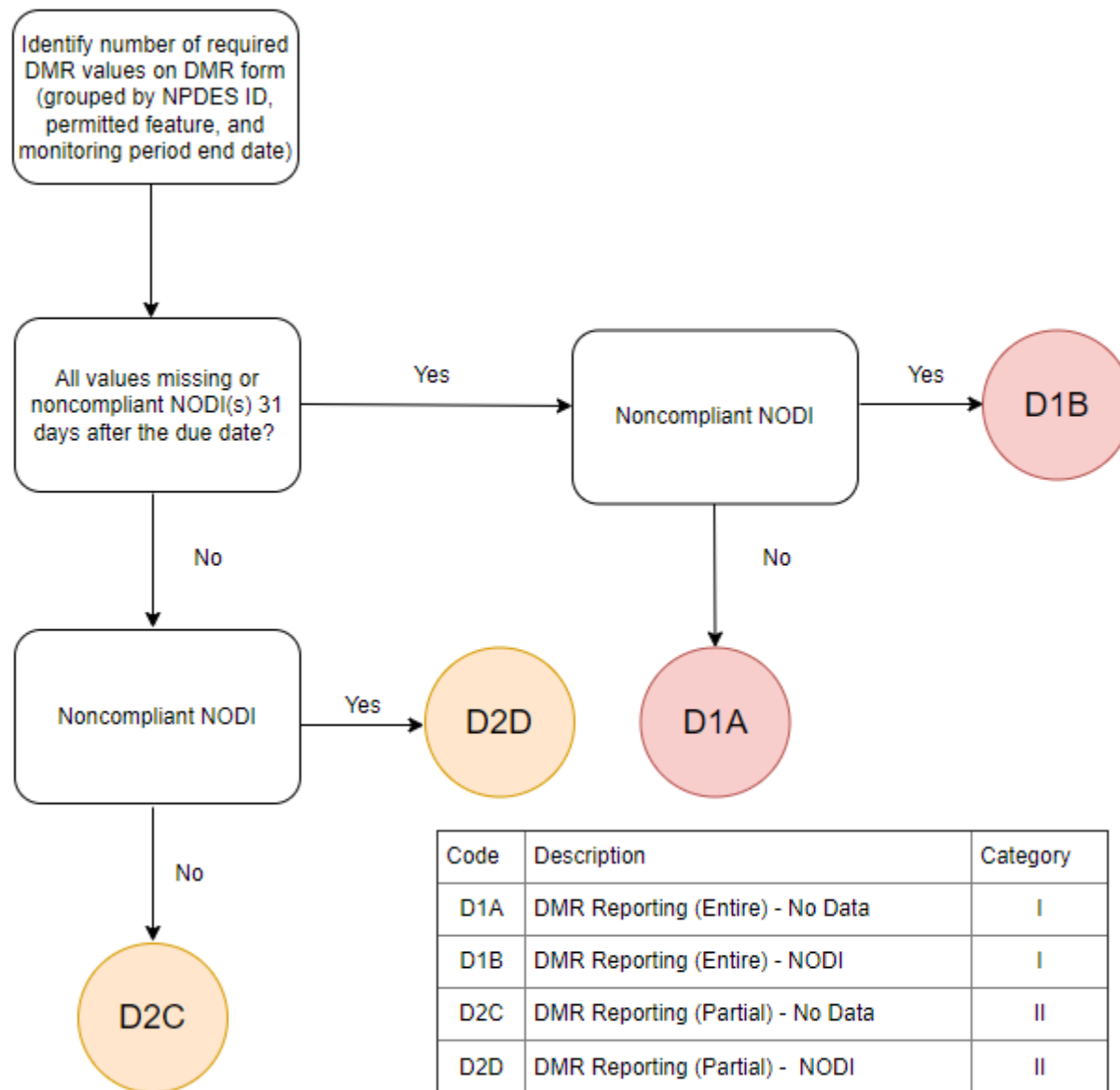
Monitoring Location: 1 - Effluent Gross

Monitoring Period End Date: 1/31/2020

Parameter	Quantity		Concentration		
	Q1	Q2	C1	C2	C3
Parameter 1	D2C				D2C
Parameter 2	D2C				D2C

DMR Reporting Detection Flow Chart

For each overdue DMR violation (D80/D90), follow the steps below to determine the violation detection code and order the violations are evaluated:



Violation Resolutions



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Violation Resolution Hierarchy

- Each violation can only have 1 violation status
- There is a hierarchy of violation statuses:
 1. Resolved
 2. Resolved Pending
 3. Unresolved

The *first automated* resolution that applies to the highest status in the hierarchy is the resolution description and date associated with the violation.

Violation Resolution

DMR reporting violations have 7 possible violation resolutions:

Resolution Code	Resolution Description	Violation Status
RP1	Formal Enforcement with Compliance Schedule	Resolved Pending
RP2	Resolved Pending - Manual	Resolved Pending
R1	Submitted Report or Completed Event	Resolved
R3	Closure of Formal Enforcement	Resolved
R4	System Administratively Resolved	Resolved
R5	Resolved – Manual	Resolved
R6	Permit Terminated	Resolved

Manual Resolutions

Resolved Pending - Manual

- Violation Status = Resolved Pending
- Resolution Date = Manually entered by the regulatory authority

Resolved - Manual

- Violation Status = Resolved
- Resolution Date = Manually entered by the regulatory authority

Note: Manual resolutions take priority over the system automated resolutions, even if it resolves the violation later

Submitted Report or Completed Event

- Violation Status = Resolved
- Resolution Date = DMR value received date
- This includes data that was corrected and resubmitted more than 30 days after the due date, even if the original submission was reported on time

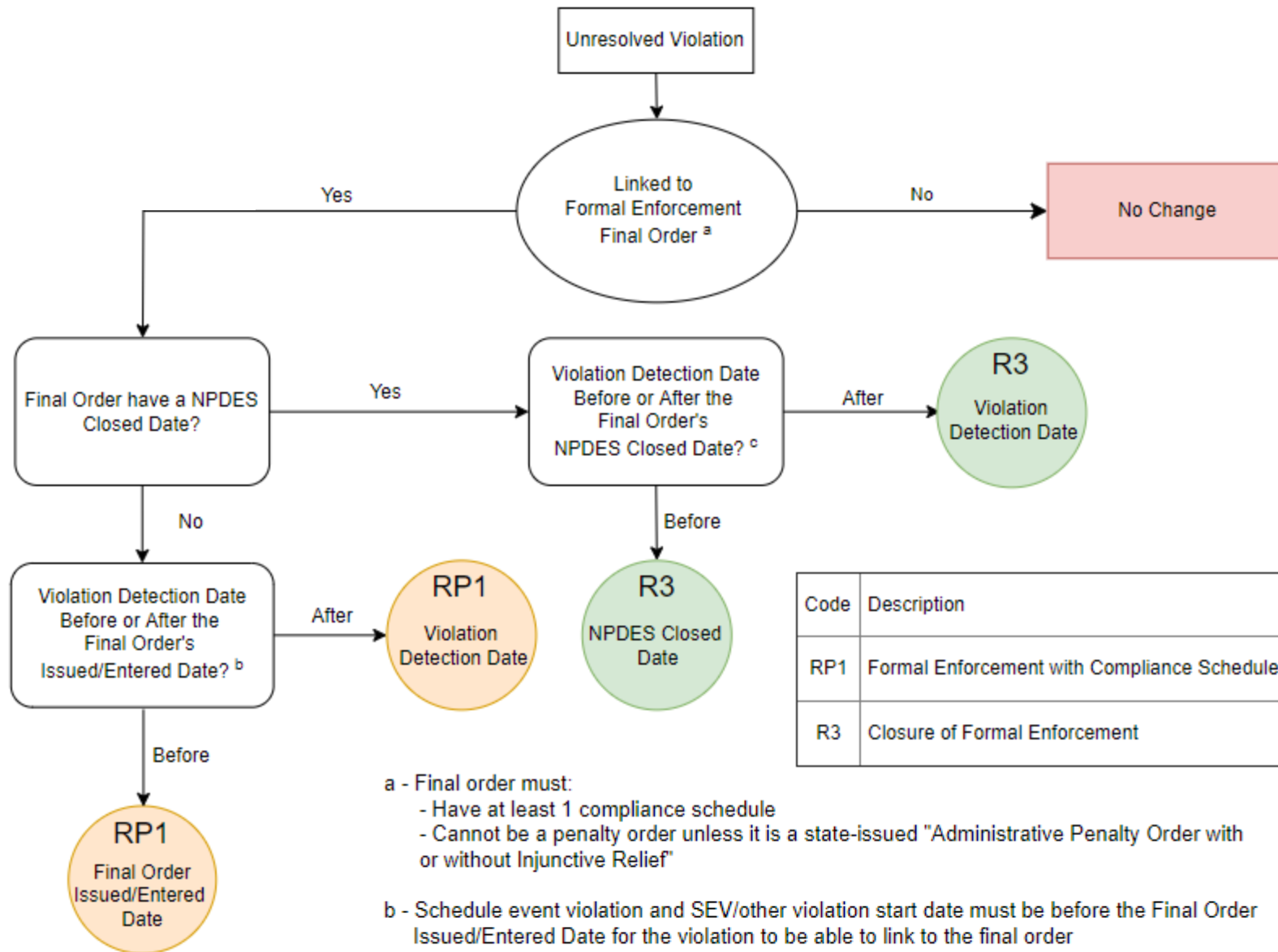
Formal Enforcement w/Compliance Schedule

- Violation Status = Resolved Pending
- Resolution Date
 - If the violation detection date is before the final order's issued/entered date, the resolution date = issued/entered date
 - If the violation detection date is after the final order's issued/entered date, the resolution date is set to the violation's detection date
- Applies when a DMR reporting violation is linked to a
 - Formal enforcement action non-penalty final order or a state-issued Administrative Penalty Order with or without Injunctive Relief and a compliance schedule, and
 - The final order *does not have* a NPDES Closed Date

Closure of Formal Enforcement

- Violation Status = Resolved
- Resolution Date
 - If the violation detection date is before the final order's NPDES Closed Date, the resolution date = NPDES closed date
 - If the violation detection date is after the final order's NPDES Closed Date, the resolution date is set to the violation's detection date
- Applies when a DMR reporting violation is linked to a
 - Formal enforcement action non-penalty final order or a state-issued Administrative Penalty Order with or without Injunctive Relief and a compliance schedule, and
 - The final order *has* a NPDES Closed Date

Resolved Pending and Resolved Status Flow Chart



Code	Description
RP1	Formal Enforcement with Compliance Schedule
R3	Closure of Formal Enforcement

a - Final order must:
 - Have at least 1 compliance schedule
 - Cannot be a penalty order unless it is a state-issued "Administrative Penalty Order with or without Injunctive Relief"

b - Schedule event violation and SEV/other violation start date must be before the Final Order Issued/Entered Date for the violation to be able to link to the final order

c - DMR violation date must be before the NPDES Closed Date for the violation's status to change with the linkage to the enforcement action

System Administratively Resolved

- Violation Status = Resolved
- Resolution Date = 1 year after the violation's detection date
- Applies when a DMR reporting violation has not previously been resolved by another method, including overriding automated Resolved Pending statuses

Note: violations with this status can still be included in enforcement actions

Permit Terminated

- Violation Status = Resolved
- Resolution Date = Permit termination date
- Violations resolved by a permit termination overrule manual resolutions, even if the manual resolution date is after the permit termination date.

Note: violations with this status can still be included in enforcement actions

DMR Reporting Violations by Quarter

DMR reporting violations will be included in a Quarterly NNCR if it meets any of the following criteria:

- Violation start date is within the quarter (new violation)
- Violation has an unresolved status and the violation start date is before the end of the quarter (ongoing violation)
- Violation has a resolved pending status and the violation start date is before the end of the quarter (resolved pending)
- Violation has a resolved status and a resolution date is during the quarter (resolved)

Accessing the NNCR



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Accessing the NNCR

- The NNCR is available on ECHO (echo.epa.gov) within the blue “Search Options” tab (in bottom left corner)
- [Quarterly NNCR Search](#)
- [NNCR Help Documentation](#)
- [NNCR Trainings](#)
- [NNCR Guide](#)

Quarterly NNCR Search Flow

1

Search Form

The search form is divided into three main sections: **Report Timeframe** with a dropdown for 'Quarterly Report' set to 'FY 2023 Q1'; **Geographic Location** with dropdowns for 'EPA Region' and 'State/Territory', and radio buttons for 'Facility Address' and 'Permitted Location'; and **Facility Characteristics** with text input for 'Facility Name', a dropdown for 'Find Facility Name(s) That:' set to 'Matches Exact Phrase', and text input for 'Facility ID Number'. It also includes radio buttons for 'EPA Registry ID' and 'Program System ID', and dropdowns for 'Major Designation' (Any, Major, Non-Major) and 'Permitting Agency' (Any, State, U.S. EPA). A blue 'Search' button is at the bottom right.

User-defined search criteria.

2

Summary Results

A table summarizing quarterly NNCR results. The table has columns for various data points. One row is highlighted with a red border, indicating a high-level violation. The text below the table states: 'Table summarizing the quarterly NNCR and displays high-level violation information. Table contains one row per NPDES ID.'

Table summarizing the quarterly NNCR and displays high-level violation information. Table contains one row per NPDES ID.

3

Detailed Report

A detailed NPDES Noncompliance Report. The report title is 'NPDES Noncompliance Report'. It displays a table with multiple columns representing different violation categories and their status. The text below the report states: 'Permit-level violation report that displays all violations for permits linked to a facility (FRS ID).'

Permit-level violation report that displays all violations for permits linked to a facility (FRS ID).

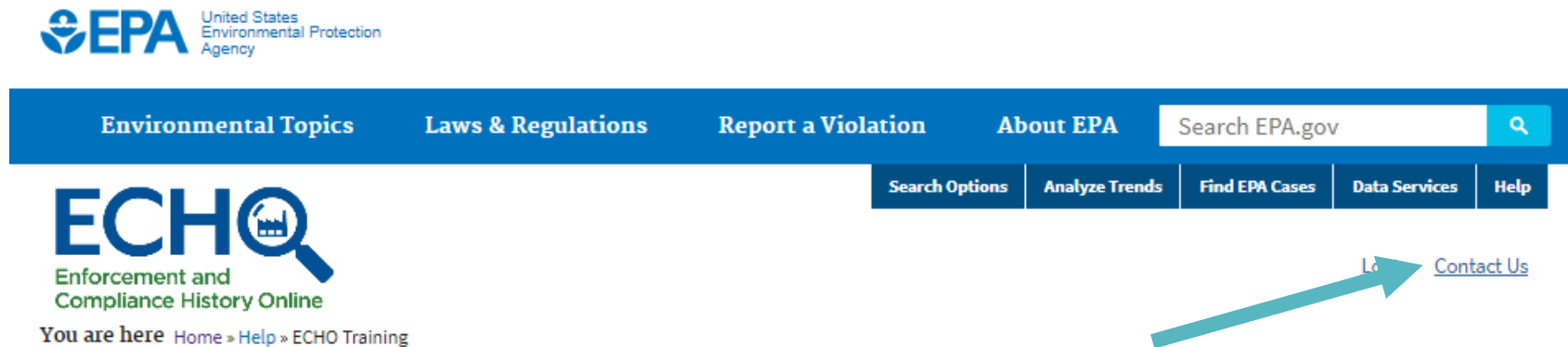
Demonstration




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Next Steps

If you have questions about the NNCR or have suggested recommendations for the workgroup to consider, please reach out to the [ECHO Help Desk](#).



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