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**Julia Anastasio**

October 14, 2016

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William Jefferson Clinton Building  
1200 Pennsylvania Ave NW, 2221A  
Washington, DC 20460

*Via email: Hindin.David@EPA.GOV*

#### **Re: NetDMR Migration to the Central Data Exchange**

The Association of Clean Water Administrators (ACWA) wishes to express support for the United States Environmental Protection Agency's (EPA) decision to delay the data migration and movement of account creation processes from NetDMR to the Central Data Exchange (CDX) system. While we recognize the importance and value of moving to CDX as soon as reasonably possible, we appreciate EPA's acknowledgement that the original proposed five week migration effort was an unworkable option for most states, and a delay until March 2017 was the best alternative option proposed, given all of the factors under consideration.

As you know, the Office of Enforcement and Compliance Assurance (OECA) worked diligently to include states in developing and finalizing the NPDES Electronic Reporting Rule. During those discussions, several states expressed concern with the short deadline proposed to implement Phase 1 of the rule. States also pointed out the importance of working collaboratively during implementation, and the value of ensuring EPA's tools were ready to support the registration and account creation processes, along with the DMR data submissions. We would also like to reinforce the message that training materials and user guides must remain a high priority and represent the types of resources EPA should make available prior to the migration.

As the NPDES eReporting program matures, we appreciate OECA's efforts to continue discussing implementation challenges. ACWA stands ready to help facilitate that communication. If you have any questions, please contact ACWA's Executive Director Julia Anastasio at [janastasio@acwa-us.org](mailto:janastasio@acwa-us.org) or (202) 756-0600.

Sincerely,

Peter LaFlamme  
ACWA President  
Director, Watershed Management Division  
Vermont Department of Environmental Conservation

Cc:

John Dombrowski, Director, Enforcement Targeting and Data Division, EPA