



Effluent Violation Reporting

No. EX column on DMR vs Non-Compliance Reports

Question 1: What type of value am I dealing with?

- Monthly Average (MO AVG)
 - Average of all results during one distinct calendar month
 - Results from different months can NOT be averaged together to calculate the monthly average
- Daily Maximum (DAILY MAX)
 - Maximum concentration measured on a single day
- Daily Minimum (DAILY MIN)
 - Minimum concentration measured on a single day
- Weekly Average (WKLY AVG)
 - Since months do not have a perfect set of four weeks, you must define your environmental week
 - Define your week (Sun-Sat, Mon-Sun, etc.)
 - Calculate the average of all sample results for each week
 - Pick the month the week applies to (the month the week ends in, begins in, or has the most) and STICK TO IT
 - *Note: environmental week only applies to weekly averages*

Question 2: How often am I testing?

- Yearly
- Semi-Annual
- Quarterly
- Monthly
- Weekly
- 2/week, 3/week, 4/week, 5/week, 6/week
- Daily

Question 3: How do I count exceedances for the No. EX column on the DMR?

- If daily maximum/daily minimum, count each sample that is below and/or above the minimum/maximum limit.
- If weekly average, count each weekly average that exceeds the limit
- Do NOT count monthly averages in the No.EX

Question 4: What goes on a Non-Compliance Report (NCR)?

- All violations go on NCR
 - Effluent violations (daily max, daily min, weekly average, monthly average, etc.)
 - Overflows
 - Bypasses
 - Spills
 - Possibly events that would endanger human health or the environment, if not already submitted in a 5 or 7 day follow-up letter to a 24 hr notification

For more information, see the EPA NPDES Reporting Requirements Manual on the Water Enforcement page of the LDEQ public website at www.deq.louisiana.gov.



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Example (see attached calendar):

- **Facility has**
 - 3/week sampling
 - they have chosen to sample M, W, F with a defined week of Sunday - Saturday
 - pH
 - has a DAILY MIN (6.0) and a DAILY MAX limit (9.0)
 - BOD
 - has a MO AVG (30) and a DAILY MAX limit (45)
 - TSS
 - has a MO AVG (30) and a WKLY AVG limit (45)
 - Fecal Coliform
 - has a MO AVG geometric (200) and a WKLY AVG geometric limit (400)
- **Sample results**
 - pH
 - DAILY MIN values below limit 2x
 - DAILY MAX values above limit 4x
 - BOD
 - MO AVG values above limit 1x
 - DAILY MAX values above limit 5x
 - TSS
 - MO AVG values above limit 1x
 - WKLY AVG values above limit 0x
 - Even if individual values go over the weekly average limit (let's say 2 values went over), they are not each counted. Only looking at each week as a whole (other values within the week could bring the average below the weekly average limit)
 - **Fecal Coliform**
 - MO AVG values above limit 0x
 - WKLY AVG values above limit 1x
- | No. EX column | No. EX |
|------------------|--------|
| ▪ pH | 6 |
| ▪ BOD | 5 |
| ▪ TSS | 0 |
| ▪ Fecal Coliform | 1 |
- | Non-Compliance Report | Required on NCR | Including Viols from DMR |
|-----------------------|----------------------------|----------------------------|
| ▪ pH | 4 viols (1 MIN + 3 MAX) | 6 viols (2 MIN+ 4 MAX) |
| ▪ BOD | 4 viols (0 MO AVG + 4 MAX) | 6 viols (1 MO AVG + 5 MAX) |
| ▪ TSS | 0 viols (0 MO AVG) | 1 viols (1 MO AVG) |
| ▪ Fecal Coliform | 0 viols (0 WKLY) | 1 viols (1 WKLY AVG) |