



# 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 (WEEKLY 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](http://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)