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 types of 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.
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
    - pH 4 viols (1 MIN + 3 MAX)
    - BOD 4 viols (0 MO AVG + 4 MAX)
    - TSS 0 viols (0 MO AVG)
    - Fecal Coliform 0 viols (0 WKLY)
  - Including Viols from DMR
    - pH 6 viols (2 MIN+ 4 MAX)
    - BOD 6 viols (1 MO AVG + 5 MAX)
    - TSS 1 viols (1 MO AVG)
    - Fecal Coliform 1 viols (1 WKLY AVG)
### Effluent Violation Reporting

#### Example Calendar

<table>
<thead>
<tr>
<th>Sunday</th>
<th>Monday</th>
<th>Tuesday</th>
<th>Wednesday</th>
<th>Thursday</th>
<th>Friday</th>
<th>Saturday</th>
</tr>
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<tbody>
<tr>
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<td>1</td>
<td>2</td>
<td>3</td>
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<td>5</td>
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<tr>
<td><strong>Dec</strong></td>
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<tr>
<td>30</td>
<td>31</td>
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<tr>
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<td>BOD = 28</td>
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<td>F.C. mo avg = 135.7</td>
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* since pH and BOD have DAILY MAX instead of WKLY AVG, the 12/31 and 02/01 pH violations do not get considered when counting violations for the month of January.