



# 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](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

• <b>No. EX column</b>	<b>No. EX</b>
▪ pH	6
▪ BOD	5
▪ TSS	0
▪ Fecal Coliform	1

• <b>Non-Compliance Report</b>	<b>Required on NCR</b>	<b>Including Viols from DMR</b>
▪ 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)

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## Example Calendar

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Dec	30	31 pH = 5.2* BOD = 33* TSS = 29 F.C. = 600	1	2 pH = 6.2 BOD = 62 TSS = 35 F.C. = 550	3	4 pH = 5.8 BOD = 58 TSS = 33 F.C. = 575	5 TSS wkly avg= 32.3 F.C. wkly avg= 574.6
	6	7 pH = 9.2 BOD = 50 TSS = 38 F.C. = 165	8	9 pH = 9.1 BOD = 25 TSS = 36 F.C. = 150	10	11 pH = 7.8 BOD = 28 TSS = 37 F.C. = 130	12 TSS wkly avg= 37 F.C. wkly avg= 147.6
Jan	13	14 pH = 7.2 BOD = 42 TSS = 34 F.C. = 115	15	16 pH = 6.8 BOD = 55 TSS = 33 F.C. = 103	17	18 pH = 7.0 BOD = 52 TSS = 35 F.C. = 105	19 TSS wkly avg= 34 F.C. wkly avg= 107.5
	20	21 pH = 6.2 BOD = 25 TSS = 40 F.C. = 80	22	23 pH = 5.7 BOD = 22 TSS = 46 F.C. = 95	24	25 pH = 9.4 BOD = 23 TSS = 47 F.C. = 87	26 TSS wkly avg= 44.3 F.C. wkly avg= 87.1
	27	28 pH = 8.9 BOD = 23 TSS = 46 F.C. = 84	29	30 pH = 8.2 BOD = 24 TSS = 40 F.C. = 75	31	1 pH = 9.3* BOD = 26* TSS = 47 F.C. = 50	2 TSS wkly avg= 44.3 F.C. wkly avg= 68
	Feb	3	4	5	6	7	8

BOD mo avg= 37.6

TSS mo avg= 38.5

F.C. mo avg= 135.7

\* since pH and BOD have DAILY MAX instead of WKLY AVG, the 12/31 and 02/01 pH violaitons do not get considered when counting violations for the month of January