

INDUSTRIAL DMR AND REPORTING GOTCHAS

By Laura Davis



THE 5 MOST COMMON INDUSTRIAL DMR REPORTING ERRORS

iDMR REPORTING ERROR #1

Incorrectly reporting/Dumb Errors 😞

- Complacency or disinterest
- *Lack of Training*
- *Rushing to meet the reporting deadline*

iDMR REPORTING ERROR #1 EXAMPLE Misreporting/Not Paying Attention

INDUSTRIAL DISCHARGER MONITORING REPORT SOUTH CAROLINA

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MONITORING PERIOD:

FROM 7/1/18 TO 7/31/18

PERMIT NO.: 1002

PIPE NO.: 001

PERMIT EXPIRES: 12/31/2019

PARAMETER		QUANTITY OR LOADING		UNITS	QUALITY OR CONCENTRATION			UNITS	NO. EX.	ANALYSIS FREQ.	SAMPLE TYPE
		MO. AVG.	DAILY MAX.		MINIMUM	MO. AVG.	DAILY MAX.				
Wastewater Flow	SAMPLE MEASUREMENT	0.0393	0.0393	MGD		0.0157	0.0157	MGD	0	Daily	Metered
	SAMPLE MEASUREMENT				0.020	0.030			Daily	Metered	
BOD ₅	SAMPLE MEASUREMENT	89.6011	224.5170	LBS/ DAY	685	91	MGL	0	Monthly	Composite	
	SAMPLE MEASUREMENT	42	63		250	250			Monthly	Composite	
Total Suspended Solids (TSS)	SAMPLE MEASUREMENT	22.3022	8.1099	LBS/ DAY		170.5	62	MGL	2	Monthly	Composite
	SAMPLE MEASUREMENT	42	63		250	250			Monthly	Composite	
Oil & Grease	SAMPLE MEASUREMENT	0.0000	0.0000	LBS/ DAY	0	0	MGL	0	Monthly	Grab	
	SAMPLE MEASUREMENT	M&R	M&R		M&R	M&R			Monthly	Grab	
pH	SAMPLE MEASUREMENT			SU	7.3	9.1	SU	0	Daily	Grab	
	SAMPLE MEASUREMENT				6	10			Daily	Grab	
	SAMPLE MEASUREMENT			LBS/ DAY			MGL				
	SAMPLE MEASUREMENT										
Cadmium, Total	SAMPLE MEASUREMENT	0.0000	0.0000	LBS/ DAY		0.0000	0.0000	MGL	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.012	0.028		0.07	0.11			Monthly	Composite	
Chromium, Total	SAMPLE MEASUREMENT	0.0018	0.0018	LBS/ DAY		0.0140	0.0140	MGL	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.285	0.693		1.71	2.77			Monthly	Composite	
Copper, Total	SAMPLE MEASUREMENT	0.0043	0.0043	LBS/ DAY		0.0330	0.0330	MGL	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.083	0.188		0.50	0.75			Monthly	Composite	

iDMR REPORTING ERROR #2

Incorrectly Reporting Exceedances 

- Not including ALL violations in the No. of Exceedances box. Some people report just one violation when they have multiple violations.

IDMR REPORTING ERROR #2 EXAMPLE Misreporting Exceedances

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MONITORING PERIOD:

FROM 7/1/18 TO 7/31/18

PERMIT NO.: 1002

PIPE NO.: 001

PERMIT EXPIRES: 12/31/2019

PARAMETER		QUANTITY OR LOADING		UNITS	QUALITY OR CONCENTRATION			UNITS	NO. EX.	ANALYSIS FREQ.	SAMPLE TYPE
		MO. AVG.	DAILY MAX.		MINIMUM	MO. AVG.	DAILY MAX.				
Wastewater Flow	SAMPLE MEASUREMENT	0.0393	0.0393	MGD		0.0157	0.0157	MGD	0	Daily	Metered
	SAMPLE MEASUREMENT					0.020	0.030				Daily
BOD ₅	SAMPLE MEASUREMENT	89.6011	224.5170	LBS/ DAY		685	91	MGL	0	Monthly	Composite
	SAMPLE MEASUREMENT	42	63			250	250				Monthly
Total Suspended Solids (TSS)	SAMPLE MEASUREMENT	22.3022	8.1099	LBS/ DAY		170.5	62	MGL	2	Monthly	Composite
	SAMPLE MEASUREMENT	42	63			250	250				Monthly
Oil & Grease	SAMPLE MEASUREMENT	0.0000	0.0000	LBS/ DAY		0	0	MGL	0	Monthly	Grab
	SAMPLE MEASUREMENT	M&R	M&R			M&R	M&R				Monthly
pH	SAMPLE MEASUREMENT			SU	7.3		9.1	SU	0	Daily	Grab
	SAMPLE MEASUREMENT				6		10				Daily
	SAMPLE MEASUREMENT			LBS/ DAY				MGL			
	SAMPLE MEASUREMENT										
Cadmium, Total	SAMPLE MEASUREMENT	0.0000	0.0000	LBS/ DAY		0.0000	0.0000	MGL	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.012	0.028			0.07	0.11				Monthly
Chromium, Total	SAMPLE MEASUREMENT	0.0018	0.0018	LBS/ DAY		0.0140	0.0140	MGL	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.285	0.693			1.71	2.77				Monthly
Copper, Total	SAMPLE MEASUREMENT	0.0043	0.0043	LBS/ DAY		0.0330	0.0330	MGL	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.083	0.188			0.50	0.75				Monthly

iDMR REPORTING ERROR #3

Not Reporting All Data 😞

If three Zinc analyses are performed ALL three analyses must be reported. If re-tests intended to reduce the average are performed all of them have to be reported.

iDMR REPORTING ERROR #4

Wrong or Missing Lab ID Numbers

All data must be reported from a SC certified lab. The below statement or similar must be in your IU permits:

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to 40 CFR Part 136 of the Federal Clean Water Act under which such regulations may be required. Laboratory tests for the analyses of pollutants must be performed by a Certified Laboratory that is certified in the analysis of the pollutant in wastewater.

IDMR REPORTING ERROR #4 EXAMPLE Wrong or Missing Lab ID Numbers

RECD 1/8/18

INDUSTRIAL DISCHARGER MONITORING REPORT [REDACTED], SOUTH CAROLINA

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MONITORING PERIOD:

10/1/18 TO 10/31/18

PERMIT NO.: 1002

PIPE NO.: 001

PERMIT EXPIRES: 12/31/2019

PARAMETER		QUANTITY OR LOADING		UNITS	QUALITY OR CONCENTRATION			UNITS	NO. EX.	ANALYSIS FREQ.	SAMPLE TYPE
		MO. AVG.	DAILY MAX.		MINIMUM	MO. AVG.	DAILY MAX.				
Wastewater Flow	SAMPLE MEASUREMENT	N/A	N/A	MGD		0.0179	0.0459	MGD	1	Daily	Metered
	PERMIT REQUIREMENT					0.020	0.030				
BOD ₅	SAMPLE MEASUREMENT	10.0220	21.9601	LBS/DAY		67	67	MGL	0	Monthly	Composite
	PERMIT REQUIREMENT	42	63			250	250				
Total Suspended Solids (TSS)	SAMPLE MEASUREMENT	0.0000	0.0000	LBS/DAY		0	0	MGL	0	Monthly	Composite
	PERMIT REQUIREMENT	42	63			250	250				
Oil & Grease	SAMPLE MEASUREMENT	0.8526	2.1820	LBS/DAY		5.7	5.7	MGL	0	Monthly	Grab
	PERMIT REQUIREMENT	M&R	M&R			M&R	M&R				
pH - Maximum	SAMPLE MEASUREMENT	N/A	N/A	SU	N/A	N/A	9.4	SU	0	Daily	Grab
	PERMIT REQUIREMENT						10				
pH - Minimum	SAMPLE MEASUREMENT	N/A	N/A	SU	7.1	N/A	N/A	SU	0	Daily	Grab
	PERMIT REQUIREMENT					6					
Cadmium, Total	SAMPLE MEASUREMENT	0.0000	0.0000	LBS/DAY			0.0000	MGL	0	Monthly	Composite
	PERMIT REQUIREMENT	0.012	0.028			0.07	0.11				
Chromium, Total	SAMPLE MEASUREMENT	0.0067	0.0172	LBS/DAY		0.0450	0.0450	MGL	0	Monthly	Composite
	PERMIT REQUIREMENT	0.285	0.693			1.71	2.77				
Copper, Total	SAMPLE MEASUREMENT	0.0087	0.0222	LBS/DAY		0.0580	0.0580	MGL	0	Monthly	Composite
	PERMIT REQUIREMENT	0.083	0.188			0.50	0.75				

A man in a uniform, possibly a police officer, is shown from the chest up. He has a surprised or concerned expression, with wide eyes and a slightly open mouth. He is wearing a light-colored uniform shirt with a dark tie. The background is dark and out of focus.

iDMR REPORTING ERROR #5 Late DMR's and not providing explanations for violations

- DMRs typically must be postmarked no later than the 15th of the month.
- The only exception is when the 15th falls on a weekend or holiday.
- An explanation must be provided for all violations

iDMR Certification

I certify under penalty of law that I have personally examined and am familiar with the information Submitted herein and based on my inquiry of those individuals immediately responsible for obtaining The information, I believe the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and Imprisonment.

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SOUTH CAROLINA

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MONITORING PERIOD: [REDACTED] FROM 7/1/18 TO 7/31/18 PERMIT NO.: 1002
PIPE NO.: 001 PERMIT EXPIRES: 12/31/2019

PARAMETER	SAMPLE MEASUREMENT	QUANTITY OR LOADING		UNITS	QUALITY OR CONCENTRATION			UNITS	NO. EX.	ANALYSIS FREQ.	SAMPLE TYPE
		MO. AVG.	DAILY MAX.		MINIMUM	MO. AVG.	DAILY MAX.				
Lead, Total LAB ID: 20010	SAMPLE MEASUREMENT	0.0002	0.0002	LB/DAY		0.0019	0.0019	MG/L	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.072	0.173	LB/DAY		0.43	0.69			Monthly	Composite
Nickel, Total LAB ID: 20015	SAMPLE MEASUREMENT	0.0022	0.0022	LB/DAY		0.0270	0.0170	MG/L	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.397	0.596	LB/DAY		2.38	3.38			Monthly	Composite
Silver, Total LAB ID: 20010	SAMPLE MEASUREMENT	0.0000	0.0000	LB/DAY		0.0000	0.0000	MG/L	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.040	0.108	LB/DAY		0.24	0.43			Monthly	Composite
Zinc, Total LAB ID: 20010	SAMPLE MEASUREMENT	0.3532	0.0136	LB/DAY		2.6850	0.1500	MG/L	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.093	0.183	LB/DAY		0.50	0.75			Monthly	Composite
Cyanide, Total LAB ID: 20010	SAMPLE MEASUREMENT	0.0003	0.0003	LB/DAY		0.0480	0.0480	MG/L	0	Monthly	Composite
	SAMPLE MEASUREMENT	0.075	0.143	LB/DAY		0.45	0.57			Monthly	Grab
Total Toxic Organics LAB ID: 20010	SAMPLE MEASUREMENT	-	-	LB/DAY		0.2699	0.2699	MG/L	0	Monthly	Grab/Composite
	SAMPLE MEASUREMENT	N/A	0.532	LB/DAY		N/A	N/A			Monthly	Grab/Composite

NAME/TITLE: [REDACTED] TITLE OR POSITION: [REDACTED] SIGNATURE OF PUBLIC OFFICER OR AUTHORIZED AGENT: [REDACTED] DATE: 7/15/2018

TELEPHONE NO.: [REDACTED]

COMMENT AND EXPLANATION OF ANY VIOLATIONS:

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

*Based on my inquiry of the person or persons directly responsible for managing compliance with the TTD limitations, I certify that, to the best of my knowledge and belief, no dumping of nonrestricted toxic organics into the wastewater has occurred since filing of the last report. I further certify that this facility has implemented the toxic organic pollution management plan submitted to the Control Authority on 9/10/09.

Questions? More Information?

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