

Discharge Monitoring Reports *A Different Perspective*

By Jim Heyen, Wastewater Tech

Recently I had the opportunity to teach a few classes with Dawn Martin from the Nebraska Department of Environmental Equality on Discharge Monitoring Reports (DMRs). I am sure those of you in attendance were glad to hear from someone other than me! So I asked her to be a guest writer for my article this month. The power is in her presentation!

DISCHARGE MONITORING REPORTS

By Dawn Martin, NDEQ

Usually, articles of this sort provide a checklist of procedures and a guide to the proper way to fill out the forms.

Boring!

Instead, since we have identified several common mistakes made in filling out and submitting DMRs, I'd like to follow the opposite course and very specifically lay out what NOT to do. Since I can't reach off the page and tap you on the forehead, I'll begin by saying **Attention Operators!**

First, **submit only one (1) set of original signed DMRs.** It is no longer necessary to submit multiple copies. Mail your one set to: NDEQ Wastewater Section/DMR, P.O. Box 98922, Lincoln, NE 68509-8922.

Next, **do not use "N.D."** For results listed below the detection limit, be sure to put in a "less than" sign and the detection limit. The detection limit is normally found in the lab bench sheets. Example: < **0.02** The letters N.D. are not an acceptable code.

If you want an accurate record of your hard work, **write clearly.** Errors can be made if values are difficult to read.

Be sure to **fill in all the blanks.** Missing values are considered a violation and dashes do not count.

While you are filling in all those blanks with your clearly written numbers, **do not use commas.** Even though you learned to put them in at school, they may cause confusion and errors in the values entered on DMRs.

As long as you are going to all the work of filling in all those blanks with clearly written non-commaed numbers or NODI codes, you might as well **use the most current DMR forms** that are burnt onto the DMR disc you received. If an updated disc (modifications, corrections, or reissued permits) has been sent, be sure to get rid of the old DMR disc or forms.

Of course you know that **"No Discharge" can only be used with Effluent Outfalls**, but there are some operators out there who don't. Influent and monitoring wells should always have values or an appropriate NODI code (eg: MCN) to submit on the DMRs.

Speaking of NODI codes, **use the code "OTH" for Total Toxic Organics.** Use OTHER (OTH) and write an explanation stating whether all the limits were below the detection limits or not.

You will probably not need to worry about **"ANC" = Analysis Not Conducted**, will you? This NODI code is only used if there has been an **ERROR** – human or otherwise. We know you don't make errors. Those other operators who do **MUST** submit a written explanation with it.

And keep in mind **MCN = Monitoring is Conditional/Not Required This Monitoring Period.** Monitoring requirements follow the **PERMIT YEAR**, not the calendar year and the timing may change when the permit is reissued. When in doubt, always check the permit.

The information submitted on the DMR is entered into a national database maintained by the Environmental Protection Agency (EPA). The Nebraska Department of Environmental Quality (NDEQ) and EPA look at this information to determine compliance with NPDES permits and any possible enforcement actions. Therefore, it is **vital** to properly complete the DMRs.

Now that we have THAT out of the way, I'd like to say "thank you" for not being one of those **other** operators who are less than perfect when filling out their DMRs. Things are going to be SO much easier now!



Dawn A. Martin

Your NDEQ ICIS (DMR) Coordinator