

THE 15 MOST COMMON DMR ERRORS

Not paying attention - Most errors stem from complacency, rushing/lack of time or lack of interest. (*Tip – Upon completion, put the DMR aside for a day and then review it. Also train someone else to do DMRs and have them review the DMR before submittal. And if possible, start working on the DMR earlier in the month to avoid rushing to meet the reporting deadline*)

Incorrect Weekly Average - Partial weeks at the end of the month carry over to the next month for WEEKLY AVERAGE reporting purposes ONLY. Remember - for DMR reporting purposes, a calendar week runs from Sunday through Saturday) (*Tip – At the beginning of each year make note of which weeks are carried over on your calendar – see attachment*)

Incorrect reporting of violations (a.k.a. exceedances) - Report all violations in the No. of Exceedances box. Some people have reported just one violation when they have multiple violations. (*See Chapter 1, Page 2 of the 2005 DMR Guidelines. Tip – Make a list of all violations [daily, weekly and monthly] on a separate piece of paper such as a cover letter, and use to correctly complete the No. of Ex boxes*)

Not correcting DMR errors properly - To correct an error on your DMR, cross out the error and enter the correct number in the field or box and initial. If you are submitting a revised DMR due to errors found by you or an inspector after submittal, correct as noted above, re-sign and re-date the DMR and forward to DES and EPA. Note: Using white out or correction tape is unacceptable. (*See Chapter 2 Page 2 of the 2005 DMR Guidelines*)

Average weekly loading averages figured incorrectly. Each day's loading must be calculated separately - then averaged. Do not use the average flow and concentration for calculating the weekly average. (*See Chapter 3 Page 2 the 2005 DMR Guidelines for guidance*)

Average monthly loading averages figured incorrectly. Each day's loading must be calculated separately – then averaged. Do not use the average flow and concentration for calculating the monthly average. (*See Chapter 3 Page 2 the 2005 DMR Guidelines for guidance*)

Not completing all reporting boxes - All boxes must be completed. Failure to complete all sample measurement boxes, without providing an explanation on the DMR or on a cover letter attached to the DMR, will result in EPA considering the omission a non-reporting violation. (*See Chapter 1 Page 4 the 2005 DMR Guidelines for guidance. Tip - take last month's DMR and compare with DMR you just completed to see if you missed anything/ also have someone else review the DMR for omissions*)

Incorrect codes – Code confusion is usually caused by not paying attention while completing the DMR or rushing. For example, one common error is entering CN (sample type code) in Frequency of Analysis reporting box instead of 99/99. *(Tip – make copies of Attachment C, D and E of the 2005 DMR Guidelines for guidance and tape them on your desk for quick reference when completing your DMR. Have someone else review your completed DMR)*

Incorrect daily flow averages - If you did not discharge every day of the month, divide total monthly flow by the number of days you discharged, not the number of days in the month. *(See Chapter 3 Page 2 the 2005 DMR Guidelines for guidance)*

No explanation for violation in comments box at bottom of DMR or in a cover letter - An explanation must be provided for all violations *(Provide an explanation for the violation with the violation list you made for reporting the number of violations. See Chapter 1 Page 6 of the 2005 DMR Guidelines)*

Permittee WET test certification statement not provided – The WET test certification statement must be included with each WET report – **REMEMBER TO SIGN AND DATE THE CERTIFICATION STATEMENT** *(Tip – provide your contract laboratory with blank copies of the certification statement and have them incorporate it in the front of each WET test report – after review, remember to sign and date the certification statement. See Attachment G of the 2005 DMR Guidelines for guidance)*

No lab analyst(s) provided – Place the name of analysts at the bottom of DMR or on the cover letter. Be sure to include the analyst on WET test DMRs too. *(See Chapter 2 Page 1 of the 2005 DMR Guidelines)*

Incorrect Geometric Mean – All samples <1 are considered as zero. If any sample is zero, “1” must be added to all samples before calculation, and one subtracted from the final answer. *(Tip – Use DES help sheet. See Chapter 1 Page 4&5 and Chapter 3 Page 4&5 of the 2005 DMR Guidelines)*

Late DMRs – DMRs typically must be postmarked no later than the 15th of the month, and the NPDES permit number must be placed on all letters and reports. The only exception is when the 15th falls on a Sunday or federal holiday. *(Tip - Put a reminder on your calendar, appointment book or computer for each month so you start working on DMR earlier in reporting month. If possible, perform required testing earlier so the data is available for review and report generation sooner. See Chapter 1 Page 3 of the 2005 DMR Guidelines)*

Spreadsheet formula errors – If you are having spreadsheet formula errors, manually check the areas where you anticipate problems to ensure your data are accurate.

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Please put the name of your DES inspector on the DMR envelope – Addressing all submittals to your inspector will speed up DES review, help eliminate misplaced documents and enable us to get back to you more quickly with questions or comments. *(Tip – Make one year of preprinted labels that include your inspector’s name. This will save time addressing submittals too.)*

What is the toughest part of your job?

- a) Dealing with difficult selectmen or sewer commissioners
- b) Trying to get hold of George Neill – the Howard Hughes of DES
- c) Explaining what you do for a living to strangers at parties
- d) Being called Norton by your uncle
- e) Completing your Discharge Monitoring Report each month

Too close to call? I imagine most of you dislike completing your DMR.

How long does it take you to complete a DMR? Too long?

Do you feel completing a DMR is a waste of time? After all no one looks at it, right?

This is a negligent attitude that could eventually place you and your community in legal hot water. Believe it or not, your DMR is a legal document, just like your income tax return, and when you sign it you are certifying that what you have reported is true, accurate and complete. In both cases, there are potentially severe consequences for reporting errors. Check it out!

The **IRS** says, at the end of Form 1040:

Under penalty of perjury, I declare that I have examined this return and accompanying schedules and statements, **and to the best of my knowledge and belief, they are true, correct and complete.**

The **EPA** says at the bottom of the DMR:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on

*my inquiry of the person persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, **to the best of my knowledge and belief, true, accurate, and complete.** I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

So what are they telling us here?

- a) EPA lawyers are a lot wordier than IRS lawyers
- b) You could be in trouble if you do not complete a DMR correctly.

Both your DMR and tax return are legal documents attesting that you are reporting truthfully about your activities. Both reporting methods are based on voluntary compliance. The DMR reporting system, like our income tax system, cannot work properly unless everyone is accurate and truthful about his/her activities. When someone cheats on his/her federal income tax, the persons who tell the truth pay more taxes. If someone lies, or is sloppy completing a DMR, EPA receives inaccurate monitoring information - information that is used to set national policies addressing pollution remediation - policies that may impact all wastewater treatment plants, and potentially cause more expense for municipalities and hassles for the people who operate wastewater treatment plants – YOU. If a DMR mistakenly states there are no process problems when in fact there are, the regulating community will take longer to find out about the problem and more environmental damage will take place before the problem is corrected. The DMR is the only tool DES and EPA have to monitor your activities other than a NPDES inspection every one or two years. Therefore your DMR reporting data is extremely important.

So what, you say. I have been having problems with my DMRs for years. What is DES going to do about it? Regretfully, in extreme cases, fine you. Presently DES is fining a community in NH \$200 a month for each incorrect DMR. Fining is not our intent, however in this particular case the permit holder has been unable to provide correct DMRs for over two years, despite many hours of technical assistance from DES. The good news is the fining stops when the DMRs are correct, so staying out of trouble ultimately remains in your (the permittee's) hands.

Maybe you have been trying to improve your DMRs, but have met with little success. You are not alone. DMRs are extremely confusing. Ease of use was not a concern for the lawyers who created the instruction book and DMR form. DMRs are not easy to complete and their complexity leads to many reporting errors.

Today our goal is to provide you with some guidance on improving DMR reporting accuracy and offers some time saving reporting ideas. With this in mind we have provided you with a handout addressing the 15 most common DMR mistakes including tips on how to eliminate them. For simplicity they have been outlined on two pages, and include page references to the NPDES Permit Program Instructions for DMRs Report Year 2004 for learning more about the how to correct the problem. I hope you will keep this list on your desk for easy reference when completing DMRs.

As I go through the list, please feel free to offer input on how you have eliminated DMR errors at your facility.

READ THE FINE PRINT

IRS - at the end of Form 1040

Under penalty of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete.

EPA – at the bottom of Discharge Monitoring Report

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, **to the best of my knowledge and belief, true, accurate, and complete.** I am aware*

that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

DMR Completion Checklist

Are you using the correct month DMR?

Are all reporting boxes complete?

----- Loading

-----Concentration

-----Units

-----Sampling codes

-----Frequency of Analysis codes

-----Number of Excursions

-----Signature (signed by authorized agent?)

-----Telephone number and date

-----Name/Title of Principal Executive Officer

----- Lab analysts provided (in house and contract laboratory)

Were there any violations?

-----All violations listed on DMR or cover letter - If there are weekly violations please note which week they occurred

-----Cause for violations and how corrected/addressed provided

-----Number of Exceedances provided in appropriate reporting box

WET test performed?

-----Certification statement signed and dated by authorized agent?

Other

-----Permit number on all correspondence?

-----Was the DMR cross-checked by another person?

-----If you sampled more frequently than required by your permit, does your FOA code reflect this fact?

Remember: your DMR must be postmarked no later than the 15th of the month

How to Improve your DMR Accuracy

Read DMR instructions and your NPDES permit

Develop good DMR work habits

When in doubt, ask

Receive training at a nearby wastewater treatment facility

Call your inspector at DES