

Joint Meeting of Essex & Union Counties Reporting Form Instructions / Frequently Asked Questions

Form JMI-01 Transmittal Form

Q – Is an IU required to submit this form every month?

A – Yes. A transmittal form must be submitted every month for every regulated outfall regardless of whether monitoring was performed.

Q – I am reporting lab data obtained from multiple contract laboratories. How should I fill out the laboratory section?

A – Attach a separate sheet of paper to form JMI-01, listing each laboratory name, certification number and telephone number. Remember to include the facility's own laboratory certification when reporting continuous pH data.

Q - Our facility did not collect any grab or composite samples for analysis this month, but we are reporting continuous pH monitoring data. Should we indicate that sampling was performed?

A – No. "Sampling performed" should only be checked if grab or composite samples were collected. A separate box is provided on the transmittal form to indicate the transmittal of continuous pH data.

Q - Our facility did not collect any grab or composite samples for analysis this month, but Joint Meeting personnel came to our plant to collect samples. Should we indicate that sampling was performed?

A – No. The Transmittal Form serves to report only the results of grab or composite samples collected by the Industrial User.

Q – Our plant manager periodically monitors our process discharge using test strips and pH paper. Are we required to report the results of this monitoring activity?

A – No. Not unless the facility is a certified laboratory and the testing technique is an approved methodology, as in the case of continuous pH monitoring. 'Sampling' in this context refers to grab or composite samples collected for analysis by a state-certified wastewater laboratory utilizing approved methodology.

Q – We performed multiple tests this month for a particular parameter. Am I required to submit all of the results?

A – Absolutely. The results of ALL samples collected for analysis by a state-certified wastewater laboratory utilizing approved methodology MUST be reported to Joint Meeting. Failure to report monitoring data is a serious, and potentially criminal, violation of the Industrial User Permit.

Q – Our Authorized Representative is on vacation. Who can sign the Transmittal form in his/her place?

A – A Principal Executive Officer as defined in 40 CFR 403.12(l) may always sign the Transmittal form or other documents requiring an official signature. The IU may also elect to designate a new authorized representative by submitting a written authorization which satisfies all the requirements of 40 CFR 403.12(l).

Joint Meeting of Essex & Union Counties Reporting Form Instructions / Frequently Asked Questions

Q – May I submit a photocopy of the Transmittal form?

A – No. The original Transmittal form, signed in blue or black ink, must be submitted to Joint Meeting. A photocopy of the entire DMR must be maintained at the facility for a period of 5 years.

Q – May I fax or e-mail the Transmittal form to Joint Meeting?

A – No. At this time, state and federal regulations require the submittal of original paper documents.

Form JMI-02 Monitoring Report

Q – The Form asks for flow meter totalizer readings at the beginning and end of the month. Joint Meeting required us to install a non-resettable totalizer in addition to the electronic totalizer on our flow meter. Which reading should we report?

A – Always report the readings for the non-resettable totalizer.

Q – What is the Monthly Total Discharge?

A – It is the difference between the totalizer readings at the beginning and end of the month. The beginning reading should be identical to the ending reading reported for the previous month.

Q – What constitutes a Working Day?

A – A day should be counted as a working day if there is a significant discharge related to the main business activity at the facility.

Q - Our facility runs production Mondays through Thursdays and on Fridays does maintenance and cleanup work. How many working days are there?

A – If a significant discharge occurs as a result of the cleaning and maintenance activity on Friday then there are 5 working days per week. If there is little or no discharge other than from restrooms on Friday, then there are 4 working days per week.

Q – What is the Daily Average Discharge?

A – It is the Monthly Total Discharge divided by the Number of Working Days.

Q- What is Sample Event Flow?

A – For a 24-hour composite sample, it is the total discharge which occurred during that 24-hour sampling period. For a grab sample it is the daily flow for that working day.

Q – What is the Sample Date for a 24-Hour Composite sample that spans 2 calendar days?

A – The Sample Date is the date on which sampling began.

Joint Meeting of Essex & Union Counties Reporting Form Instructions / Frequently Asked Questions

Form JMI-03 Self Monitoring Documentation

Q – What is “Hours of Facility Operation (during sampling event)”?

A – During the sampling event, the number of hours that the facility was operating its manufacturing process or performing other activities which resulted in a significant wastewater discharge.

Q – What is “Flow Data Generated for Manual Flow Proportion”?

A – This refers to the manual method of creating a 24 hour flow proportioned composite by taking proportional sample volumes from 24 discreet bottles, based on the flow rate at the time the bottle was collected. If this proportioning method is used, a copy of the flow data and sample volumes used to create the composite (a composite worksheet) must be attached.

Form JMI-04 Field Calibration Sheet

Q - What is meant by “Check Buffer”?

A – This is a buffer solution that is used to verify the calibration of the instrument. The known and measured values should be reported in the spaces provided. The buffer should be selected based on the calibrated range of the instrument. For example, if the instrument is calibrated using buffers of 7.0 S.U. and 10.0 S.U., then a check buffer with a pH in between these should be selected.

Form JMI-05 Laboratory Analysis Log

Q – Multiple laboratories performed analyses for this reporting period. How do I fill out the form?

A – Separate forms must be completed and signed by each laboratory, listing those parameters for which they are reporting results.

Q – What is the Holding Time for a BOD analysis performed on a 24-hour composite Sample?

A – The BOD setup must be performed within 48 Hours of the END TIME of the composite. (40 CFR 136, Table 11). The BOD completion must take place 5 days after setup.

Q – Our laboratory performed a BOD analysis and reported a result to us, but the holding time was exceeded. Should I report the result?

A – If the laboratory generated a result you must report it, but indicate that the holding time was exceeded on Form JMI-05. A resampling event must be conducted to obtain a valid result.

Joint Meeting of Essex & Union Counties Reporting Form Instructions / Frequently Asked Questions

Form JMI-06 Tabulation of pH Chart Violations

Q – What is Start Time?

A – It is the time that the pH reading began to exceed the permitted limits.

Q – What is End Time?

A – It is the time that the pH reading returned to within permit limits.

Q- What is Duration?

A – It is the time (expressed in minutes) that the pH reading was outside permitted limits; the difference between end time and start time.

Q – Our pH reading drifted in and out of compliance many times over a 2 hour period. May we tabulate this as 2 hours out of compliance (ie: one violation)?

A – Yes, but there will be no ‘credit’ given for the time the pH was within range.

Q – What is Greatest Exceedance?

A – For a given violation, the Greatest Exceedance is the pH reading that was furthest from a neutral pH (7.0 S.U.). In simplest terms, what was the worst pH reading on either side of the acceptable range? For a low pH violation this should be recorded in the MIN column. For a high pH value, this should be recorded in the MAX column.

Q – What is Total Time in Violation?

A – It is the sum of all the time that the pH was in violation for the month, expressed in minutes.

Q – What is Total Monthly Discharge Time?

A – This is the amount of time during the month (expressed in minutes) that discharge was occurring via the regulated outfall.

Q – What is Percent of Time in Violation?

A – It is the Total Time in Violation divided by the Total Monthly Discharge Time multiplied by 100.

Q – Our facility’s pH violations were too numerous to list on a single sheet. If we submit multiple sheets do we have to calculate a percent of time in violation for each sheet?

A – No. The summation and percentage calculations should be performed once, for the entire monthly period, and reported on the last sheet.

Joint Meeting of Essex & Union Counties Reporting Form Instructions / Frequently Asked Questions

Form JMI-07 Periodic Report on Continued Compliance

Q – Am I required to Submit form JMI-07?

A – Only Categorical Industrial Users must submit Form JMI-07. Categorical IU's will be designated as such in the IU Permit and Form JMI-07 will be listed among the reporting requirements.

Q – What is a Category?

A – Categories are specific industrial operations that are defined and regulated in the federal pretreatment regulations. The categories which apply to a facility, if any, are listed in the IU Permit.

Q - How often do I submit Form JMI-07?

A – Categorical IU's submit Form JMI-07 Semiannually, based on the calendar year. The Form is due on the last day of the month after the close of the semiannual period. Therefore the report covering the months of January through June is due by July 31. The report for July through December is due by January 31. This will be noted in the reporting requirements section of the Permit for all Categorical IU's.

Form JMI-09 Response to Notice of Violation

Q – What is the “Response No.”?

A – The Response No. is listed in the heading of the Notice of Violation you received. Joint Meeting uses this number for tracking purposes. It should be referenced in all correspondence pertaining to the Notice of Violation.

Q – What is “Explanation of the Nature of the Violation”?

A – Describe what caused the parameter(s) in question to exceed the permitted limits.

Q – What is “Measures taken to remedy the cause and prevent a recurrence of the violation”?

A – Describe what corrective actions were taken to achieve and maintain compliance.

Q – What is “Resampling Information”?

A – An IU is required to resample within 30 days of becoming aware of the violation to demonstrate that the violation has been corrected. The result (and supporting documentation) must be submitted with this response as well as with the DMR for the month in which the resampling event occurred.