

Self Monitoring Report (SMR) Fact Sheet

Things To Remember

- Report ALL violations **within 24 hours** of discovery
- Use a certified laboratory for all required analysis.
- Fill out your SMR Form completely and **sign it**.
- Submit your SMR Form, with all required documents, even if no wastewater was discharged in the reporting period.
- Complete one SMR Form for each **sample point** and for each **sample event**.
- Incomplete SMR Forms, untimely submittal of SMR Forms, or failure to report violations **within 24 hours** of discovery can lead to legal and monetary penalties.

**Cobb County Water System (CCWS)
Environmental Compliance Division
Industrial Pretreatment Program**



Cobb County...Expect the Best!

The Cobb County Water System's Industrial Pretreatment Program (IPP) is responsible for:

1. Protecting publicly owned treatment works (POTW) from pollutants that may cause interference with sewage treatment plant operations.
2. Preventing the introduction of pollutants into a POTW that could cause pass through of untreated pollutants to receiving waters.
3. Preventing the introduction of pollutants into a POTW that could cause worker health or safety concerns, or that could pose a potential endangerment to the public or to the environment.
4. Ensuring compliance with local, state, and federal pretreatment regulations.

An Industrial User's (IU) Self Monitoring Report (SMR) is one of the methods used to accomplish the above objectives.

Why Self Monitoring?

Federal, state, and local pretreatment regulations require permitted IUs to conduct periodic self monitoring of the flow, nature, and concentration of pollutants in their effluent. Specifically, Official Code of Cobb County 122-186 (c)(2): Periodic Compliance Reports states:

A sample of the SMR form. It includes fields for Company Name, Permit Number, Monitoring Point, Address, and Monitoring Period. Below these is a table for recording data for various parameters: Flow, MGD; pH, S.U.; Biochemical Oxygen Demand; Total Suspended Solids; Total Toxic Organics (TTO); and Copper. The table has columns for Quantity (Today), Average, Minimum, and Maximum, and a Sample Type column. At the bottom, there is a signature line and a title line.

A SMR form can be obtained by contacting the CCWS Industrial Pretreatment Program. (770) 528-8216 or (770) 528-8217

"All users who have been issued discharge permits are required to submit compliance reports at the intervals set forth in each user's individual permit, but not less than twice a year. The compliance reports shall address the discharge parameters and all other information indicated as being necessary to report as shown in the user's permit."

As a permitted IU, you have a responsibility to submit a periodic SMR. **Your SMR requirements are described in sections I, II, and III of your Industrial Wastewater Discharge Permit.** Your SMR allows us to determine your compliance with discharge limits and with other local, state, and federal compliance standards.

To learn more about Industrial Pretreatment in Cobb County, please visit www.cobbwater.org.

This is an official publication of the Cobb County Water System, an agency of the Cobb County Board of Commissioners.

2 Self Monitoring Report Fact Sheet

Preventing SMR Violations

- **Read your Permit**, understand your self monitoring requirements and contact the CCWS IPP if you have any questions.
- **Mark your calendar** well in advance of your SMR due date and keep blank SMR forms handy.
- **Schedule collection of samples well in advance** of the SMR due date so a laboratory delay won't cause you to be in violation for late submittal.
- **Sample during the period specified in your permit.** For example, if your SMR is due on July 10: For monthly reporting your sample must have been taken during the month of June; for quarterly reporting your sample must have been taken between April 1 and June 30; for semi-annual reporting your sample must have been taken between January 1 and June 30.
- **Be sure to document** the date and time of sample collection; if you have an outside contractor collect your samples, be sure the event is logged.
- **Sample and analyze correctly** for all required constituents as specified in your Permit. Permit requirements specify the pollutants to be analyzed and the methods of sample collection. Ensure your laboratory uses analytical methods approved by the US EPA for wastewater analysis, NOT hazardous or solid waste analysis.
- **Submit your SMR on time** – SMRs are due in our office on or before the 15th of the months listed in Section III of your Permit.
- **Submit your SMR even if no wastewater is generated during the reporting period** with all required documentation, as listed in your Permit.
- **Complete one SMR for each sample point and each sample event** if you have multiple sample points or sample collection events.
- **Ensure that your SMR is complete** and includes all attachments. If anything is missing, attach an explanation stating why and when it will be submitted, and send the missing information promptly.
- **Ensure that your SMR has been signed.** SMRs must be signed by an authorized representative.
- **Regularly maintain all self monitoring equipment and documentation**, as this is a condition of your Permit and demonstrates your level of effort to prevent violations.
- **Respond immediately to violations** by implementing and documenting corrective actions.
- **Most importantly, report ALL violations within 24 hours.** Review all laboratory results upon receipt and report ALL violations to the CCWS IPP regardless of whether the monitoring was carried out for SMR reporting purposes, or for another purpose.

Consequences of SMR Violations

SMR violations, including discharge violations, incomplete SMRs, untimely submittal of SMRs, or failure to report violations within 24 hours of discovery, can trigger the following consequences:

Legal, administrative, and punitive consequences for your business ranging from verbal warning to monetary fines



Requirements for changes or additional procedures, equipment, sampling, record keeping, etc.



Referral to the County Attorney's or the District Attorney's Office for prosecution



Your business name published in the newspaper as being in "Significant Noncompliance" under Federal mandate 40 CFR 403.8(f)(2)(viii)



3 Self Monitoring Report Fact Sheet

Avoid Self Monitoring Violations from Equipment Failure

Self monitoring equipment may include, but is not limited to, flow meters, pH meters, and automatic samplers.

- Conduct regular maintenance of monitoring equipment
- Document repairs, periodic maintenance, and equipment replacement
- Keep spare replacement and repair parts on hand
- Set up a redundant sampling system

Attachments

Include all necessary attachments with your SMR Form as required in Sections II and III of your Permit; these attachments could include:

- Laboratory results
- Chain of custody
- Additional sampling results, if required
- Quality Assurance/Quality Control (QA/QC) documentation
- Supporting flow documents such as treatment log books, water bills, or flow meter reading logs
- TTO Certification Forms, if required
- Flow meter calibration certification, if required
- Waste manifests for the reporting period, if required
- Production data, if required

The Cobb County Collection System consists of 2,700 miles of sewer lines including unincorporated Cobb, the five cities of Acworth, Austell, Kennesaw, Marietta, Powder Springs, Smyrna, small portions of Bartow, Cherokee, Douglas, Fulton and Paulding counties, and the City of Atlanta.

Environmental Effects of Discharge Violations

SMR violations, including discharge violations, incomplete SMRs, untimely submittal of SMRs, or failure to report violations within 24 hours of discovery, can trigger the following consequences:



Hazardous substances can endanger workers by releasing toxic fumes, generating explosive conditions in the sewer system, and causing chemical burns.



Acidic discharges can result in sewer line failure, pump station failure, collection interceptor breakdown, disruption of service, and uncontrolled releases of wastewater generating toxic conditions.



Pollutants of concern in the wastewater can disrupt Wastewater Facility operations and sludge processes. This is called "interference."



Pollutants can disrupt the Wastewater Facility's treatment processes, causing the Wastewater Facility to be in violation of its National Pollutant Discharge Elimination System (NPDES) effluent discharge permit.



4 Self Monitoring Report Fact Sheet

Directions for each lettered section on the SMR form are itemized below.

Top section:

A Fill in the full legal Company Name, Permit Number, and Discharge Address.

B Enter the SMR Reporting Period start and end dates. **Remember to fill out a SEPARATE SMR FORM for each sample point and sample event.**

C Enter the Sample Point Description identifying where the sample was collected. **Remember to fill out a SEPARATE SMR FORM for each sample point and sample event.**

Analytical Results section:

D Enter the highest Daily Maximum Flow Reading, for the reporting period in millions of gallons per day (MGD). (1000 gallons per day (GPD) is equal to 0.001000 MGD).

E Enter the minimum and maximum pH readings for the reporting period. If only one reading was taken, enter the reading in the maximum column.

F Enter the name of the Parameter(s) analyzed.

G Enter all analytical data in milligrams per liter (mg/L). If your laboratory provided results in micrograms per liter (µg/L), convert the results to mg/L by dividing the result by 1000 (e.g., 10 µg/L/1000 = 0.01mg/L). If the parameter was not detected, enter the value as "less than the Reporting Limit" (e.g., <0.010 if the Reporting Limit is 0.01); do not enter "ND", "N/A", or "BDL".

H For each Parameter analyzed, indicate whether the sample was a Grab (G) or Composite (C) Sample.

I Calculate and enter the pounds per day (lbs/day) results (only if permit limits are stipulated as lbs/day in Section I of the permit).

J When reporting Total Toxic Organic (TTO) data, remember to totalize all TTO results greater than 10µg/L (0.010 mg/L).

K Indicate whether Discharge Standards were met for your permitted parameter(s) for the reporting period and enclose any relevant documentation.

Certification Statement section:

L Ensure that your SMR Form is signed by an authorized representative.

**COBB COUNTY WATER SYSTEM INDUSTRIAL PRETREATMENT PROGRAM
SELF MONITORING REPORT**

Company Name: **A** Permit number: **A** Address: **A**
Monitoring Point: **C** Monitoring Period: **B**

Parameter	Measurement Limit	Quantity (lb/day)		Quantity		Sample Type
		Average	Maximum	Average	Maximum	
Flow, MGD						
pH, S.U.						
Biochemical Oxygen Demand						
Total Suspended Solids						
Total Toxic Organics (TTO)						
Copper						

Comments and explanations for violations: **K**

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based upon my inquiry of those individuals immediately responsible for obtaining the information, 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 fines and imprisonment.

Signature: **L** Title: Date:

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Industrial Pretreatment Program staff:**

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To learn more about Industrial Pretreatment in Cobb County, please visit www.cobbwater.org.

This document is modeled from the City of San José, California's Environmental Services Department, Pretreatment Program.