

**FACT SHEET AND STATEMENT OF BASIS
PAYSON POWER PLANT
MODIFIED PERMIT: DISCHARGE & STORM WATER
UPDES PERMIT NUMBER: UT0025518
UPDES MULTI-SECTOR STORM WATER GENERAL PERMIT NUMBER: UTR000000
MINOR INDUSTRIAL**

FACILITY CONTACTS

Person Name:	Mark Schwartz
Position:	Manager of Generation, Nebo Plant Manager
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Position:	Director of Power Resources/Environmental
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Facility Name:	Payson Power Plant (Nebo Power Station)
Owner/Operator:	Utah Associated Municipal Power Systems
Mailing Address:	2825 East Cottonwood Parkway, Ste. 200 Salt Lake City, Utah 84121-7055
Telephone:	(801) 566-3938
Actual Address:	1100 North 1100 East Payson, Utah 84651

DESCRIPTION OF FACILITY

Payson Power Project (Payson Power) is located in Payson, Utah at latitude 40°03'30" and longitude 111°43'45". Payson Power's Standard Industrial Classification (SIC) code is 4911, and the North American Industry Classification System (NAICS) code is 221111 for Steam Electric Power Generation.

Utah Associated Municipal Power Systems (UAMPS) constructed a new electric generating facility in Payson, Utah with an electric output of 141MW. The facility utilizes a gas-fired Combustion Turbine with a Heat Recovery Steam Generator and a steam turbine operating in a combined-cycle mode. UAMPS has identified this plant as the Nebo Power Station, but it was referred to as the Payson Power Project when it was being permitted, prior to construction. They have not requested that facility name in the permit be changed.

Cooling water is obtained from the Payson City Wastewater Treatment Plant (Payson City). The treatment plant and Payson Power have an agreement to use the treatment plant's effluent for cooling water purposes. The flow will enter the cooling tower and will be discharged as a non-contact cooling water stream. The estimated flow is 0.75MGD.

During the 2017 Renewal a new WLA model was calibrated and used for developing the permit limits, and DWQ started conducting a reasonable potential analysis on the metals monitoring results. The new WLA

impacted the limits for ammonia, TRC, TDS, and temperature. The RP indicated there was a need to change the monitoring frequency for chromium, zinc, cyanide, selenium, mercury, and aluminum.

SUMMARY OF CHANGES FROM PREVIOUS PERMIT

The limit for cyanide is being removed from the permit.

In the previous permit renewal (2017), the effluent monitoring data was used in the Reasonable Potential analysis (RP) to determine if there was any RP for the facility to exceed the water quality based effluent limits. As a result of the RP, it was determined that cyanide should have a limit based on the WQBEL from the waste load analysis (WLA). Recently the cyanide standard in rule was re-evaluated and it was determined that the standard in rule is for free cyanide, whereas the WQBEL in the WLA was based on the numeric criteria for total cyanide.

Free cyanide is a subset of total cyanide and the ratio of free to total varies based on multiple factors. Payson Power has monitored the levels for both free and total cyanide in the effluent and requested that the limits and RP for cyanide be evaluated again. The permit has been modified accordingly.

The RP evaluation was completed and as a result the limit for total cyanide is being removed from the permit and monitoring will be reduced. The removal of the cyanide limit is allowed since new information has been brought forward to show the previous evaluation was not complete.

The RP evaluation was also completed for free cyanide with an inconclusive result. The results of the RP runs are included in the attachment at the end of this FSSOB. The conclusion is that it cannot be determined if there is RP for free cyanide; therefore, no limit will be added to the permit at this time and monitoring for free cyanide will be included.

Summary of the modifications to the effluent limits and monitoring frequency tables.

Parameter	Current Permit		Modified Permit	
	Maximum Monthly Avg	Daily Maximum	Maximum Monthly Avg	Daily Maximum
Cyanide, Total, mg/L	0.0148	-	-	-
Cyanide Free, mg/L	-	-	-	-

Self-Monitoring and Reporting Requirements Modifications						
Parameter	Current Permit			Modified Permit		
	Frequency	Sample Type	Units	Frequency	Sample Type	Units
Cyanide, Total	Weekly	Grab	mg/L	Monthly	Grab	mg/L
Cyanide, Free	-	-	-	Monthly	Grab	mg/L

DISCHARGE

DESCRIPTION OF DISCHARGE

Payson Power discharges into an irrigation ditch which runs approximately one to two miles before entering Beer Creek. Beer Creek runs through Benjamin Slough and hence to Utah Lake. Payson Power has been reporting self-monitoring results on Discharge Monitoring Reports on a monthly basis. A summary of the last 3 years of data is attached and there were no significant violations.

Outfall

Description of Discharge Point

001 The discharge is located at latitude 40°03'30" and longitude 111°43'45" into an unnamed ditch and eventually into the Benjamin Slough via Beer Creek.

RECEIVING WATERS AND STREAM CLASSIFICATION

The final discharge flows into an unnamed ditch hence to Beer Creek. The route that the effluent takes has been classified as 2B & 3C (Beer Creek) and 4 (unnamed ditch and Beer Creek) according to *Utah Administrative Code (UAC) R317-2-13*.

- Class 2B -- Protected for infrequent primary contact recreation. Also protected for secondary contact recreation where there is a low likelihood of ingestion of water or a low degree of bodily contact with the water. Examples include, but are not limited to, wading, hunting, and fishing.
- Class 3C -- Protected for nongame fish and other aquatic life, including the necessary aquatic organisms in their food chain.
- Class 4 -- Protected for agricultural uses including irrigation of crops and stock watering.

BASIS FOR EFFLUENT LIMITATIONS

Reasonable Potential Analysis

Since January 1, 2016, Water Quality has conducted reasonable potential analysis (RP) on all new and renewal applications received after that date. RP for this permit renewal was conducted following Water Quality's September 10, 2015 Reasonable Potential Analysis Guidance (RP Guidance). There are four outcomes defined in the RP Guidance: Outcome A, B, C, or D. These Outcomes provide a frame work for what routine monitoring or effluent limitations are required.

A quantitative RP analysis was performed on cyanide, both free and total cyanide, to determine if there was reasonable potential for the discharge to exceed the applicable water quality standards. Based on the RP analysis, there was no RP for total cyanide exceeded the most stringent chronic water quality standard, and it was inconclusive regarding RP for free cyanide. A copy of the RP analysis is included in Attachment 4 at the end of this Fact Sheet.

Attached is a Wasteload Analysis for this discharge into the unnamed irrigation ditch. It has been determined that this discharge will not cause a violation of water quality standards. An Antidegradation Level II review is not required since the Level I review shows that water quality impacts are minimal. The permittee is expected to be able to comply with these limitations.

The removal of cyanide as a limit for the permit is based on new information regarding the water quality standard for cyanide, and is supported by the performance of an RP analysis for both total and free cyanide monitoring data.

The permit limitations are

Parameter	Effluent Limitations ¹				
	Maximum Monthly Avg	Maximum Weekly Avg	Yearly Average	Daily Minimum	Daily Maximum
Total Flow, MGD	1	-	-	-	-
TSS, mg/L	25	35	-	-	-
Oil & Grease, mg/L	-	-	-	-	10.0
pH, Standard Units	-	-	-	6.5	9
TDS, mg/L	-	-	-	-	3396
DO, mg/L	-	-	-	4.0	-
Temperature (°C)					
Summer (Jul-Sep)	-	-	-	-	39.9
Fall (Oct-Dec)	-	-	-	-	46.6
Winter (Jan-Mar)	-	-	-	-	47.8
Spring (Apr-Jun)	-	-	-	-	47.0
TRC, mg/L					
Summer (Jul-Sep)	-	-	-	-	2.2
Fall (Oct-Dec)	-	-	-	-	1.2
Winter (Jan-Mar)	-	-	-	-	0.7
Spring (Apr-Jun)	-	-	-	-	1.0
Total Ammonia (as N), mg/L					
Summer (Jul-Sep)	10	-	-	-	-
Fall (Oct-Dec)	12.4	-	-	-	-
Winter (Jan-Mar)	12.4	-	-	-	-
Spring (Apr-Jun)	12.4	-	-	-	-
Copper, mg/L	0.12	-	-	-	-
Iron, mg/L	1.0	-	-	-	1.0
Chromium, mg/L	0.2	-	-	-	0.2
Zinc, mg/L	1.0	-	-	-	1.0
Selenium, mg/L	0.0169	-	-	-	-

1. See Definitions, Part VIII, for definition of terms.

SELF-MONITORING AND REPORTING REQUIREMENTS

The following self-monitoring requirements have been modified. The permit will require reports to be submitted monthly and annually, as applicable, on Discharge Monitoring Report (DMR) forms due 28 days after the end of the monitoring period. Effective January 1, 2017, monitoring results must be submitted using NetDMR unless the permittee has successfully petitioned for an exception. Lab sheets for metals and toxic organics must be attached to the DMRs.

Self-Monitoring and Reporting Requirements ¹			
Parameter	Frequency	Sample Type	Units
Total Flow ²	Instantaneous	Recorder	MGD
TRC	Daily	Grab	mg/L
TDS	Weekly	Grab	mg/L

¹ See Definitions, Part VIII, for definition of terms.

Self-Monitoring and Reporting Requirements ¹			
Parameter	Frequency	Sample Type	Units
DO	Weekly	Grab	mg/L
TSS	Weekly	Grab	mg/L
Ammonia	Weekly	Grab	mg/L
Temperature	Weekly	Grab	°C
pH	Weekly	Grab	SU
Oil & Grease	Monthly	Grab	mg/L
Copper	Weekly	Grab	mg/L
Iron	Weekly	Grab	mg/L
Chromium	Weekly	Grab	mg/L
Zinc	Weekly	Grab	mg/L
Selenium	Weekly	Grab	mg/L
Cyanide, Free ⁴	Monthly	Grab	mg/L
Cyanide, Total ⁵	Monthly	Grab	mg/L
Mercury	Monthly	Grab	mg/L
Aluminum	Quarterly	Grab	mg/L
Arsenic	Quarterly	Grab	mg/L
Cadmium	Quarterly	Grab	mg/L
Lead	Quarterly	Grab	mg/L
Nickel	Quarterly	Grab	mg/L
Silver	Quarterly	Grab	mg/L
Orthophosphate, (as P) ³ Effluent	Monthly	Composite	mg/L
Total Ammonia (as N) ³ Effluent	Monthly	Composite	mg/L
Phosphorus, Total ³ Influent	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
Total Kjeldahl Nitrogen, TKN (as N) ³ Influent	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
Nitrate, NO ₃ ³	Monthly	Composite	mg/L
Nitrite, NO ₂ ³	Monthly	Composite	mg/L
Priority Pollutants ⁶	Once Every 2 Years	Grab	mg/L
1. See Definitions, Part VIII, for definition of terms.			
2. If the rate of discharge is controlled, the rate and duration of discharge shall be reported.			
3. These reflect changes required with the adoption of UCA R317-1-3.3, Technology-based Phosphorus Effluent Limits rule.			
4. Monitoring for free cyanide is being added as part of the permit modification			
5. Monitoring for total cyanide is being reduced as part of			
6. Testing must be performed in the first, second, and fifth years of the permit cycle. A list of the priority pollutants to be tested can be found in 40CFR423 appendix A.			

STORM WATER

No Changes

BIOMONITORING REQUIREMENTS

No Changes

PERMIT DURATION

It is recommended that this permit be effective for the remainder of the current permits cycle (March 31, 2023).

Drafted and Reviewed by
Daniel Griffin, Discharge, Reasonable Potential Analysis
Nick von Stackelberg, Wasteload Analysis
Utah Division of Water Quality, (801) 536-4300

PUBLIC NOTICE

Began: July Day, 2022
Ended: August Day, 2022

Comments will be received at: 195 North 1950 West
PO Box 144870
Salt Lake City, UT 84114-4870

The Public Noticed of the draft permit was published on the Division of Water Quality Public Notice Webpage.

During the public comment period provided under R317-8-6.5, any interested person may submit written comments on the draft permit and may request a public hearing, if no hearing has already been scheduled. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. All comments will be considered in making the final decision and shall be answered as provided in R317-8-6.12.

ADDENDUM TO FSSOB

During finalization of the Permit certain dates, spelling edits and minor language corrections were completed. Due to the nature of these changes they were not considered Major and the permit is not required to be re Public Noticed.

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ATTACHMENT 3

Wasteload Analysis

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ATTACHMENT 4

Reasonable Potential Analysis

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PND Draft

REASONABLE POTENTIAL ANALYSIS

Water Quality has worked to improve our reasonable potential analysis (RP) for the inclusion of limits for parameters in the permit by using an EPA provided model. As a result of the model, more parameters may be included in the renewal permit. A Copy of the Reasonable Potential Analysis Guidance (RP Guide) is available at water Quality. There are four outcomes for the RP Analysis². They are;

- Outcome A: A new effluent limitation will be placed in the permit.
- Outcome B: No new effluent limitation. Routine monitoring requirements will be placed or increased from what they are in the permit,
- Outcome C: No new effluent limitation. Routine monitoring requirements maintained as they are in the permit,
- Outcome D: No limitation or routine monitoring requirements are in the permit.

(REASONABLE POTENTIAL LANGUAGE)

This is a permit modification to remove a limit for total cyanide. A full RP analysis was run against the available data for both free and total cyanide.

Free cyanide is a subset of total cyanide, but the analysis for free cyanide is not able to detect it at a low a level as the analysis for total cyanide. For the methods and laboratory used by <UAMPS> the MDL for free cyanide in 0.016 mg/L, and the MDL for total cyanide is 0.002 mg/L.

The RP model was run on total cyanide using the most recent data back through 2022. This resulted in 28 data points. The EPA ProUCL model was used to evaluate the data “Goodness of Fit” (GOF) and outliers. ProUCL could not identify a GOF for the results distribution, thus the default setting of Lognormal Distribution was used in the RP Model. ProUCL identified 2 possible outliers, but there was no evidence to support dismissing the data point, so they were included. The model was run at the 95% and 99% confidence level. The model indicated that there was no an RP for the exceedance of either the acute or chronic WQBEL.

As a result, the limit will be removed from the permit, and the minimum monitoring frequency will be reduced to match the screening frequency required for other metals.

The RP model was run on free cyanide using the most recent data back through 2022. This resulted in 16 data points. The EPA ProUCL model was used to evaluate the data “Goodness of Fit” (GOF) and outliers. All the free cyanide analytical results indicated that they were below the reporting limit for the analysis. As a result, no GOF could be determined, thus the default of Lognormal Distribution Setting was used in the RP Model. And no outliers could be identified. The model was run at the 95% and 99% confidence level. For the first and second runs the data was listed as ND for non-detect. When all the data points are ND the model returns a result of N/A. This is an indication that there are no numeric values to evaluate. When this happens, the first thing to try is to replace the ND with the reporting limit value.

This replacement was done, and the model was run again at both the 95% and 99% confidence level. The result of these runs was an indication that there is no RP for free cyanide to exceed the Acute WQBEL. The model did indicate that there is RP for free cyanide to exceed the Chronic WQBEL. The chronic WQBEL of 0.015 mg/L is also below the reporting limit of 0.016 mg/L for the method used. Once again, this is an issue with the applicability of the model. At times it is appropriate, and allowed by the EPA, to use ½ the

² See Reasonable Potential Analysis Guidance for definitions of terms

reporting values when the analytical results indicate that a parameter is below the reporting limit. This was done, and the model was run again at both the 95% and 99% confidence level. The result of this last run is an indication of no RP for free cyanide at either the chronic or acute WQBEL.

When just the free cyanide RP runs are taken into consideration, it is not conclusive that a limit for free cyanide should be excluded from the permit. Since free cyanide is a subset of total cyanide, and the RP for total cyanide was based on a monitoring data set that included values that were both above and the MRL, it is determined that no limit for free cyanide will be included in the permit at this time, but monitoring for free cyanide will be included, and at a frequency that will help determine in the future if an effluent limit is appropriate or not.

Summary of changes to the effluent limits and monitoring frequency tables.

Parameter	Current Permit		Modified Permit	
	Maximum Monthly Avg	Daily Maximum	Maximum Monthly Avg	Daily Maximum
Cyanide, Total, mg/L	0.0148	-	-	-
Cyanide Free, mg/L	-	-	-	-

Self-Monitoring and Reporting Requirements Modifications						
Parameter	Current Permit			Modified Permit		
	Frequency	Sample Type	Units	Frequency	Sample Type	Units
Cyanide, Total	Weekly	Grab	mg/L	Monthly	Grab	mg/L
Cyanide, Free	-	-	-	Monthly	Grab	mg/L

A Summary of the RP Model inputs and outputs are included in the table below.

The Metals Initial Screening Table and RP Outputs Table are included in this attachment.

Cyanide monitoring results for 2022

		Free CN	Total CN
	MRL	0.016	0.002
	1		0.005
	2		ND
	3		ND
	4		ND
	5		ND
	6		ND
	7		0.002
	8		0.002
	9		ND
	10		0.003
	11		ND
	12		0.002
	13	ND	0.003
	14	ND	ND
	15	ND	0.002
	16	ND	ND
	17	ND	ND
	18	ND	ND
	19	ND	0.005
	20	ND	0.004
	21	ND	0.003
	22	ND	ND
	23	ND	ND
	24	ND	ND
	25	ND	ND
	26	ND	0.003
	27	ND	ND
	28	ND	ND
	Max	0.016	0.005
	WQBEL		
Acute	0.119	No	No
Chronic	0.015	Yes	No

RP input/output summary

RP Procedure Output	Outfall Number:	
Outfall Number:	001	
Data Units	mg/L	
Parameter	Cyanide, Total	
Distribution	Lognormal	
Reporting Limit	0.002	
Significant Figures	2	
Maximum Reported Effluent Conc.	0.005	
Coefficient of Variation (CV)	0.37	
Acute Criterion	0.119	
Chronic Criterion	0.015	
Confidence Interval	95	99
Projected Maximum Effluent Conc. (MEC)	0.007	0.0099
RP Multiplier	1.4	20
RP for Acute?	No	No
RP for Chronic?	No	No
Outcome	D	

RP Procedure Output	Outfall Number:	001	Data Units	mg/L		
Parameter	metal					
Distribution	Cyanide, Free					
Reporting Limit	0.016	Replace ND with MRL of 0.016	Replace ND with ½ MRL of 0.008			
Significant Figures	2					
Maximum Reported Effluent Conc.	ND	0.016	0.008			
Coefficient of Variation (CV)	#NUM!	#NUM!	#NUM!			
Acute Criterion	0.119	0.119	0.119			
Chronic Criterion	0.015	0.015	0.015			
Model Run	#1	#2	#3	#4	#5	#6
Confidence Interval	95	99	95	99	95	99
RP Multiplier	#N/A	#N/A	1.0	1.0	1.0	1.0
Projected Maximum Effluent Conc. (MEC)	#N/A	#N/A	0.016	0.016	0.008	0.008
RP for Acute?	#N/A	#N/A	No	No	No	No
RP for Chronic?	#N/A	#N/A	Yes	Yes	No	No
Outcome	#N/A	#N/A	D/A	D/A	D	D
Overall Recommended Outcome	B					

total cyanide RP Results

RP Procedure Output			Effluent Data	
Facility Name:	Payson Power		#	0.005
Permit Number:	UT0025518		1	ND
Outfall Number:	001		2	ND
Parameter	Cyanide, Total		3	ND
Distribution	Lognormal (default)		4	ND
Data Units	mg/L		5	ND
Reporting Limit	0.002 mg/L		6	0.002
Significant Figures	2		7	0.002
Confidence Interval	95		8	ND
			9	0.003
Maximum Reported Effluent Conc.	0.005	mg/L	10	ND
Coefficient of Variation (CV)	0.37		11	0.002
RP Multiplier	1.4		12	0.003
Projected Maximum Effluent Conc. (MEC)	0.007	mg/L	13	ND
			14	0.002
Acute Criterion	0.119	0	15	ND
Chronic Criterion	0.015	0	16	ND
Human Health Criterion	0	0	17	ND
			18	0.005
RP for Acute?	NO		19	0.004
RP for Chronic?	NO		20	0.003
RP for Human Health?	N/A		21	ND
			22	ND
Confidence Interval	99		23	ND
			24	ND
Maximum Reported Effluent Conc.	0.005		25	0.003
Coefficient of Variation (CV)	0.37		26	ND
RP Multiplier	2.0		27	ND
Projected Maximum Effluent Conc. (MEC)	0.0099		28	0.005
			29	
Acute Criterion	0.119		30	
Chronic Criterion	0.015		31	
Human Health Criterion	0		32	
			33	
RP for Acute?	NO		34	
RP for Chronic?	NO		35	
RP for Human Health?	N/A		36	
			37	
			38	
			39	
			40	

free cyanide RP Results, Runs #1 and #2

RP Procedure Output			Effluent Data	
Facility Name:	Payson Power		#	
Permit Number:	UT0025518		1	ND
Outfall Number:	001		2	ND
Parameter	Cyanide, Free		3	ND
Distribution	Lognormal (default)		4	ND
Data Units	mg/L		5	ND
Reporting Limit	0.016 mg/L		6	ND
Significant Figures	2		7	ND
			8	ND
Run	#2		9	ND
Confidence Interval	95		10	ND
			11	ND
Maximum Reported Effluent Conc.	0	mg/L	12	ND
Coefficient of Variation (CV)	#NUM!		13	ND
RP Multiplier	#N/A		14	ND
Projected Maximum Effluent Conc. (MEC)	#N/A	mg/L	15	ND
			16	ND
Acute Criterion	0.119	0		
Chronic Criterion	0.015	0		
RP for Acute?	#N/A			
RP for Chronic?	#N/A			
Run	#2			
Confidence Interval	95			
Maximum Reported Effluent Conc.	0			
Coefficient of Variation (CV)	#NUM!			
RP Multiplier	#N/A			
Projected Maximum Effluent Conc. (MEC)	#N/A			
Acute Criterion	0.119			
Chronic Criterion	0.015			
RP for Acute?	#N/A			
RP for Chronic?	#N/A			

free cyanide RP Results, Runs #3 and #4

RP Procedure Output			Effluent Data	
Facility Name:	Payson Power		#	
Permit Number:	UT0025518		1	0.016
Outfall Number:	001		2	0.016
Parameter	Cyanide, Free		3	0.016
Distribution	Lognormal (default)		4	0.016
Data Units	mg/L		5	0.016
Reporting Limit	0.016 mg/L		6	0.016
Significant Figures	2		7	0.016
			8	0.016
Run	#3		9	0.016
Confidence Interval	95		10	0.016
			11	0.016
Maximum Reported Effluent Conc.	0.016	mg/L	12	0.016
Coefficient of Variation (CV)	#NUM!		13	0.016
RP Multiplier	1.0		14	0.016
Projected Maximum Effluent Conc. (MEC)	0.016	mg/L	15	0.016
			16	0.016
Acute Criterion	0.119			
Chronic Criterion	0.015			
RP for Acute?	NO			
RP for Chronic?	YES			
Run	#4			
Confidence Interval	99			
Maximum Reported Effluent Conc.	0.016			
Coefficient of Variation (CV)	#NUM!			
RP Multiplier	1.0			
Projected Maximum Effluent Conc. (MEC)	0.016			
Acute Criterion	0.119			
Chronic Criterion	0.015			
RP for Acute?	NO			
RP for Chronic?	YES			

free cyanide RP Results, Runs #5 and #6

RP Procedure Output			Effluent Data	
Facility Name:	Payson Power		#	
Permit Number:	UT0025518		1	0.008
Outfall Number:	001		2	0.008
Parameter	Cyanide, Free		3	0.008
Distribution	Lognormal (default)		4	0.008
Data Units	mg/L		5	0.008
Reporting Limit	0.016 mg/L		6	0.008
Significant Figures	2		7	0.008
			8	0.008
Run	#5		9	0.008
Confidence Interval	95		10	0.008
			11	0.008
Maximum Reported Effluent Conc.	0.008	mg/L	12	0.008
Coefficient of Variation (CV)	#NUM!		13	0.008
RP Multiplier	1.0		14	0.008
Projected Maximum Effluent Conc. (MEC)	0.008	mg/L	15	0.008
			16	0.008
Acute Criterion	0.119			
Chronic Criterion	0.015			
RP for Acute?	NO			
RP for Chronic?	NO			
Run	#6			
Confidence Interval	99			
Maximum Reported Effluent Conc.	0.008			
Coefficient of Variation (CV)	#NUM!			
RP Multiplier	1.0			
Projected Maximum Effluent Conc. (MEC)	0.008			
Acute Criterion	0.119			
Chronic Criterion	0.015			
RP for Acute?	NO			
RP for Chronic?	NO			