

National Pollutant Discharge Elimination System (NPDES) Permit Program

F A C T S H E E T

Regarding an NPDES Permit To Discharge to Waters of the State of Ohio  
for **Durez Corporation**

Public Notice No.: 14-05-045  
Public Notice Date: May 22, 2014  
Comment Period Ends: June 22, 2014

OEPA Permit No.: **2IF00002\*LD**  
Application No.: (OH #) **OH0006769**

Name and Address of Applicant:

**Durez Corporation**  
**13717 State Route 68 South**  
**Kenton, Ohio 43326**

Name and Address of Facility Where  
Discharge Occurs:

**Durez Corporation**  
**13717 State Route 68 South**  
**Kenton, Ohio 43756**  
**Hardin County**

Receiving Water: **Taylor Creek**

Subsequent  
Stream Network: **Scioto River**  
**Ohio River**

Introduction

Development of a Fact Sheet for NPDES permits is mandated by Title 40 of the Code of Federal Regulations (CFR), Section 124.8 and 124.56. This document fulfills the requirements established in those regulations by providing the information necessary to inform the public of actions proposed by the Ohio Environmental Protection Agency (Ohio EPA), as well as the methods by which the public can participate in the process of finalizing those actions.

This Fact Sheet is prepared in order to document the technical basis and risk management decisions that are considered in the determination of water quality based NPDES Permit effluent limitations. The technical basis for the Fact Sheet may consist of evaluations of promulgated effluent guidelines, existing effluent quality, instream biological, chemical and physical conditions, and the relative risk of alternative effluent limitations. This Fact Sheet details the discretionary decision-making process empowered to the Director by the Clean Water Act and Ohio Water Pollution Control Law (Ohio Revised Code [ORC] 6111). Decisions to award variances to Water Quality Standards or promulgated effluent guidelines for economic or technological reasons will also be justified in the Fact Sheet where necessary.

This request has been reviewed under the anti-degradation provisions of the Ohio Administrative Code. Based upon this review, the Director has determined that a lowering of water quality in Taylor Creek and the Scioto River is necessary. In accordance with OAC 3745-1-05, this decision was reached only after examining a series of technical alternatives, reviewing social and economic issues related to the degradation, and considering all public and appropriate intergovernmental comments.

## Procedures for Participation in the Formulation of Final Determinations

The proposed modification is tentative but shall become final on the effective date unless (1) an adjudication hearing is requested, (2) the Director withdraws and revises the proposed modification after consideration of the record of a public meeting or written comments, or (3) upon disapproval by the Administrator of the U.S. Environmental Protection Agency.

Within thirty (30) days of publication of this notice, any person may submit written comments, a statement as to why the proposed modification should be changed, a request for a public meeting on the proposed modification and/or a request for notice of further actions concerning the modification. All communications timely received will be considered in the final formulation of the modification. If significant public interest is shown a public meeting will be held prior to finalization of the modification.

Within thirty (30) days of the issuance of the proposed modification any officer of an agency of the state or of a political subdivision, acting in his representative capacity or any person aggrieved or adversely affected by issuance of it may request an adjudication hearing by submitting a written objection in accordance with ORC Section 3745.07. Since all other conditions of the permit remain in effect, a hearing may not be requested on any issues other than the proposed modification. If an adjudication hearing is requested, the existing NPDES permit will remain in effect until the hearing is resolved. Following the finalization of the modification by the Director, any person who was a party to an adjudication hearing may appeal to the Environmental Review Appeals Commission.

Requests for public meetings shall be in writing and shall state the action of the Director objected to, the questions to be considered, and the reasons the action is contested. Such requests should be addressed to:

**Legal Records Section  
Ohio Environmental Protection Agency  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049**

Interested persons are invited to submit written comments upon the proposed modification. Comments should be submitted in person or by mail no later than 30 days after the date of this Public Notice. Deliver or mail all comments to:

**Ohio Environmental Protection Agency  
Attention: Division of Surface Water  
Permits and Compliance Section  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049**

The Ohio EPA permit number and Public Notice numbers should appear on each page of any submitted comments. All comments received no later than 30 days after the date of the Public Notice will be considered.

Citizens may conduct file reviews regarding specific companies or sites. Appointments are necessary to conduct file reviews, because requests to review files have increased dramatically in recent years. The first 250 pages copied are free. For requests to copy more than 250 pages, there is a five-cent charge for each page copied. Payment is required by check or money order, made payable to Treasurer State of Ohio.

For additional information about this fact sheet or the proposed modification, contact Peggy Christie, (419) 373-3006, [Margaret.Christie@epa.ohio.gov](mailto:Margaret.Christie@epa.ohio.gov).

### Information Regarding Certain Water Quality Based Effluent Limits

This draft permit may contain proposed water quality based effluent limitations for parameters that **are not** priority pollutants. (See the following link for a list of the priority pollutants: [http://epa.ohio.gov/portals/35/pretreatment/Pretreatment\\_Program\\_Priority\\_Pollutant\\_Detection\\_Limits.pdf](http://epa.ohio.gov/portals/35/pretreatment/Pretreatment_Program_Priority_Pollutant_Detection_Limits.pdf).) In accordance with ORC Section 6111.03(J)(3), the Director established these water quality based effluent limits after considering, to the extent consistent with the Federal Water Pollution Control Act, evidence relating to the technical feasibility and economic reasonableness of removing the polluting properties from those wastes and to evidence relating to conditions calculated to result from that action and their relation to benefits to the people of the state and to accomplishment of the purposes of this chapter. This determination was made based on data and information available at the time the permit was drafted, which included the contents of the timely submitted NPDES permit renewal application, along with any and all pertinent information available to the Director.

This public notice allows the permittee to provide to the Director for consideration during this public comment period additional site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness for achieving compliance with the proposed final effluent limitations for these parameters. The permittee shall deliver or mail this information to:

**Ohio Environmental Protection Agency  
Attention: Division of Surface Water  
Permits Processing Unit  
P.O. Box 1049  
Columbus, Ohio 43216-1049**

Should the applicant need additional time to review, obtain or develop site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness of achieving compliance with these limitations, written notification for any additional time shall be sent to the above address no later than 30 days after the Public Notice Date on Page 1.

Should the applicant determine that compliance with the proposed water quality based effluent limitations for parameters other than the priority pollutants is technically and/or economically unattainable, the permittee may submit an application for a variance to the applicable water quality standard(s) used to develop the proposed effluent limitation in accordance with the terms and conditions set forth in OAC 3745-33-07(D). The permittee shall submit this application to the above address no later than 30 days after the Public Notice Date.

Alternately, the applicant may propose the development of site-specific water quality standard(s) pursuant to OAC 3745-1-35. The permittee shall submit written notification regarding their intent to develop site specific water quality standards for parameters that are not priority pollutants to the above address no later than 30 days after the Public Notice Date.

### Location of Discharge/Receiving Water Use Classification

Durez Corporation discharges to Taylor Creek through one outfall at River Mile (RM) 2.10 in Hardin County. Taylor Creek flows into the Scioto River which empties into the Ohio River. Taylor Creek has the following designated uses: Warmwater Habitat (WWH), Agricultural Water Supply (AWS), Industrial Water Supply, and Primary Contact Recreation (PCR). This section of Taylor Creek is identified by Ohio EPA River Code 02-181 and U.S. EPA River Reach number 050600001-035, and is located in the Eastern Corn Belt Plains ecoregion. The approximate location of the facility is shown in Figure 1.

Use designations define the goals and expectations for a waterbody. These goals are set for aquatic life protection, recreation use and water supply use, and are defined in the Ohio Water Quality Standards, or the

Ohio Administrative Code (OAC 3745-1-07). The use designations for individual waterbodies are listed in rules -08 through -32 of the OAC. Once the goals are set, numeric water quality standards are developed to protect these uses; higher quality uses typically have more protective water quality criteria.

### Facility Description

Durez Corporation manufactures phenolic-based molding compounds and resins used in a variety of industrial and commercial applications, ranging from automotive brake pistons to frying pan handles. Phenolic resins are formed as the result of a condensation reaction which takes place in a batch reactor. Raw materials used in the production process are phenol and formaldehyde, which are reacted together in the presence of an acid catalyst. After the reaction, the resulting resin product is further processed by vacuum distillation. Resin from the batch reactors is passed through flaking rolls where it is reduced in size, and then packaged. The facility uses some of the resin to produce molding compounds by mixing resin, wood flour, dyes, or pigments, and various fillers in a ribbon blender. A heated rolling operation produces sheets of material which are further processed into saleable products by cooling, grinding, screening, and blending.

This plant is classified under the Standard Industrial Classification Code (SIC) 2821 which is identified as “Phenolic Resin and Molding Compounds.” The process wastestreams generated by this facility are regulated by Chapter 40 of the Code of Federal Regulations, Part 414, “Organic Chemicals, Plastics, and Synthetic Fibers.” This modification only concerns outfall 001.

### Description of Existing Discharge

Table 1 presents a summary of unaltered Discharge Monitoring Report (DMR) data for outfall 001 only. Data are presented for the period February 2012 to April 2014.

### Basis of the Modification

Durez Corporation will be adding a new organic raw material, styrene, to the Kettle (batch reactor) process to result in a new sellable resin product. The wastewater (distillate) from the Kettle will be very similar to the exiting wastewater distillates, but may contain very low quantities of styrene. Styrene is listed in the NPDES Permit Application instructions as a “Toxic Pollutant and Hazardous Substance”; however, styrene was not identified as a potential constituent in the wastewater in the last permit application.

Ohio EPA is proposing to modify the final effluent limitation and monitoring requirements for Outfall 001 by adding quarterly monitoring for the parameter Styrene.

### *Styrene Limits*

Ohio EPA is proposing that the styrene maximum effluent concentration limitation of 83 ug/L and a styrene maximum monthly average of 25 ug/L at outfall 001 be included in this permit modification. In addition to the concentration limit, Ohio EPA is proposing the styrene maximum effluent loading limit of 0.047 kg/day and a maximum average monthly loading limit of 0.014 ug/L at outfall 001 be added to the permit. These limits are based on the existing limit for ethylbenzene, as the two chemicals are similar enough that treatability should be the same.

Figure 1. Approximate Location of Durez Corporation (see cross-hatched area)

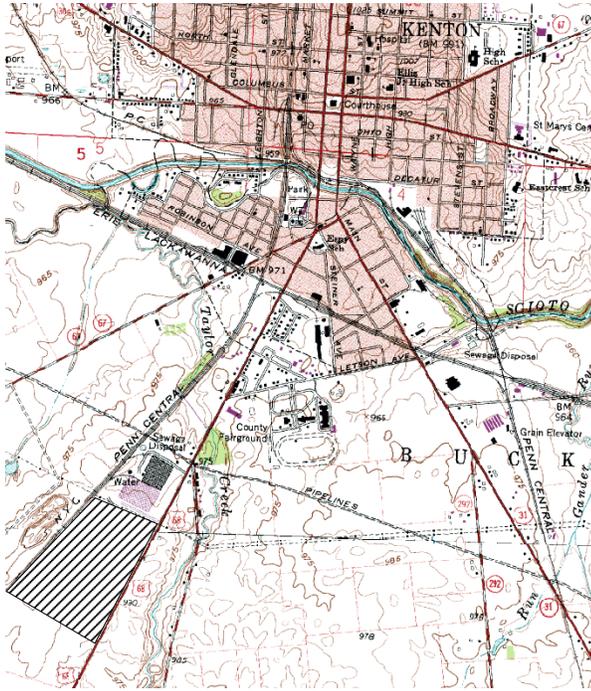


Table 1. Effluent Characterization Using Self-Monitoring Data

Parameter	Season	Units	Current Permit Limits		# Obs.	Percentiles		Data Range
			30 day	Daily		50 <sup>th</sup>	95 <sup>th</sup>	
<b>Outfall 001</b>								
Water Temperature	Annual	C			111	16.7	24.8	2.8-27.4
Dissolved Oxygen	Summer	mg/l			48	7.84	19.1	7-20.9
Dissolved Oxygen	Winter	mg/l			63	9.43	12.5	7.15-13.2
pH	Annual	S.U.			107	7.96	8.4	6.7-8.8
Total Suspended Solids	Annual	mg/l			105	0	30.2	0-72
Oil and Grease, Total	Annual	mg/l			105	0	0	0-0
Nitrogen, Ammonia (NH3)	Summer	mg/l			46	0.205	1.06	0-1.18
Nitrogen, Ammonia (NH3)	Winter	mg/l			59	0.45	0.864	0-1.29
Phosphorus, Total (P)	Annual	mg/l			105	0.2	1.93	0-7.16
Lead, Total (Pb)	Annual	ug/l			105	0	0	0-0
Strontium, Total (Sr)	Annual	ug/l			32	4280	5880	500-6810
Zinc, Total (Zn)	Annual	ug/l			105	0	28.8	0-119
Carbon Tetrachloride	Annual	ug/l			2	0	0	0-0
Chloroform	Annual	ug/l			2	0	0	0-0
Toluene	Annual	ug/l			2	0	0	0-0
Benzene	Annual	ug/l			2	0	0	0-0
Acenaphthylene	Annual	ug/l			2	0	0	0-0
Acenaphthene	Annual	ug/l			2	0	0	0-0
Acrylonitrile	Annual	ug/l			2	0	0	0-0
Anthracene, General Organic	Annual	ug/l			2	0	0	0-0
3,4-BenzoFluoranthene	Annual	ug/l			2	0	0	0-0
Benzo(k)Fluoranthene	Annual	ug/l			2	0	0	0-0
Chloroethane	Annual	ug/l			2	0	0	0-0
Chrysene	Annual	ug/l			3	0	0	0-0
Diethyl phthalate	Annual	ug/l			2	0	0	0-0
Dimethyl phthalate	Annual	ug/l			2	0	0	0-0
Ethylbenzene	Annual	ug/l			2	0	0	0-0
Fluoranthene	Annual	ug/l			2	0	0	0-0
Fluorene	Annual	ug/l			2	0	0	0-0

Parameter	Season	Units	Current Permit Limits		# Obs.	Percentiles		Data Range
			30 day	Daily		50 <sup>th</sup>	95 <sup>th</sup>	
Hexachloroethane	Annual	ug/l			2	0	0	0-0
Methyl Chloride	Annual	ug/l			2	0	0	0-0
Methylene Chloride	Annual	ug/l			2	0	0	0-0
Nitrobenzene	Annual	ug/l			2	0	0	0-0
Phenanthrene	Annual	ug/l			2	0	0	0-0
Pyrene	Annual	ug/l			2	0	0	0-0
Tetrachloroethylene	Annual	ug/l			2	0	0	0-0
1,1-Dichloroethane	Annual	ug/l			2	0	0	0-0
1,1-Dichloroethylene	Annual	ug/l			2	0	0	0-0
1,1,1-Trichloroethane	Annual	ug/l			2	0	0	0-0
1,1,2-Trichloroethane	Annual	ug/l			2	0	0	0-0
Benzo(A)Anthracene	Annual	ug/l			2	0	0	0-0
1,2-Dichloroethane	Annual	ug/l			2	0	0	0-0
1,2-Dichlorobenzene	Annual	ug/l			2	0	0	0-0
1,2-trans-Dichloroethylene	Annual	ug/l			2	0	0	0-0
1,2,4-Trichlorobenzene	Annual	ug/l			2	0	0	0-0
1,3-Dichlorobenzene	Annual	ug/l			2	0	0	0-0
1,4-Dichlorobenzene	Annual	ug/l			2	0	0	0-0
2-Chlorophenol	Annual	ug/l			2	0	0	0-0
2-Nitrophenol	Annual	ug/l			2	0	0	0-0
2,4-Dichlorophenol	Annual	ug/l			2	0	0	0-0
2,4-Dimethylphenol	Annual	ug/l			2	0	0	0-0
2,4-Dinitrotoluene	Annual	ug/l			2	0	0	0-0
2,4-Dinitrophenol	Annual	ug/l			2	0	0	0-0
2,6-Dinitrotoluene	Annual	ug/l			2	0	0	0-0
4-Nitrophenol	Annual	ug/l			2	0	0	0-0
4,6-Dinitro-o-cresol	Annual	ug/l			2	0	0	0-0
Phenol	Annual	ug/l			2	0	0	0-0
Naphthalene	Annual	ug/l			2	0	0	0-0
Bis(2-ethylhexyl) Phthalate	Annual	ug/l			2	0	0	0-0
Di-N-Butylphthalate	Annual	ug/l			2	0	0	0-0
Vinyl Chloride	Annual	ug/l			2	0	0	0-0
Trichloroethylene	Annual	ug/l			2	0	0	0-0
Hexachlorobenzene	Annual	ug/l			2	0	0	0-0
Hexachlorobutadiene	Annual	ug/l			2	0	0	0-0
Chlorobenzene	Annual	ug/l			2	0	0	0-0
Flow Rate	Summer	MGD			362	0.073	0.272	0-0.468

Parameter	Season	Units	Current Permit Limits		# Obs.	Percentiles		Data Range
			30 day	Daily		50 <sup>th</sup>	95 <sup>th</sup>	
Flow Rate	Winter	MGD			449	0.088	0.298	0.003-0.884
Flow Rate	Annual	MGD			811	0.08	0.29	0-0.884
Mercury, Total (Low Level)	Annual	ng/l			27	0	2.46	0-3.27
Acute Toxicity, Ceriodaphnia dubia	Annual	TUa			2	0	0	0-0
Chronic Toxicity, Ceriodaphnia dubia	Annual	TUc			2	1.25	1.39	1.1-1.4
Acute Toxicity, Pimephales promelas	Annual	TUa			1	0	0	0-0
Residue, Total Filterable	Annual	mg/l			29	857	1110	337-1250
1,3-Dichloropropylene	Annual	ug/l			2	0	0	0-0
CBOD 5 day	Summer	mg/l			47	0	10.5	0-15
CBOD 5 day	Winter	mg/l			58	0	7.78	0-17

**Table 2 Modified Final Effluent Limits and Monitoring Requirements for Durez Corp. Outfall 001**

Effluent Limits						
Parameter	Units	Concentration		Loading (kg/day) <sup>a</sup>		Basis <sup>b</sup>
		30 day Average	Daily Maximum	30 day Average	Daily Maximum	
Water Temperature	°C	-----Monitoring-----				M <sup>c</sup> /EP
Dissolved Oxygen	Mg/l	----- 7 mg/l minimum -----				EP
Summer		----- 5 mg/l minimum -----				EP
Winter						
pH	S.U.	----- 6.5 to 9.0 -----				WQS
Total suspended solids	mg/l	30	45	36	54	EP
Oil & grease	mg/l	--	10	--	--	EP
Nitrogen, Ammonia	mg/l					
Summer		1.5	2.25	1.8	2.72	EP/BPJ
Winter		8	12	9.6	14.5	EP/BPJ
Phosphorus	mg/l	-----Monitoring-----				EP/BPJ
Lead, Total	µg/l	54	580	0.0726	0.328	FEG-BAT/ABS
Strontium	µg/l	27000	30000	8.68	46.44	AD/RP
Zinc, Total	µg/l	556	2180	0.497	0.747	FEG-BAT/ABS
Carbon Tetrachloride	µg/l	14	29	0.008	0.016	FEG-BAT/ABS
Chloroform	µg/l	16	35	0.009	0.020	FEG-BAT/ABS
Toluene	µg/l	18	49	0.010	0.027	FEG-BAT/ABS
Benzene	µg/l	28	105	0.016	0.059	FEG-BAT/ABS
Acenaphthylene	µg/l	17	45	0.009	0.025	FEG-BAT/ABS
Acenaphthene	µg/l	17	45	0.009	0.025	FEG-BAT/ABS
Acrylonitrile	µg/l	74	186	0.042	0.105	FEG-BAT/ABS
Anthracene	µg/l	0.043	0.35	0.000058	0.000471	FEG-BAT/ABS
3,4-BenzoFluoranthene	µg/l	18	47	0.010	0.027	FEG-BAT/ABS
Benzo(k)Fluoranthene	µg/l	17	45	0.009	0.025	FEG-BAT/ABS
Chloroethane	µg/l	80	206	0.045	0.117	FEG-BAT/ABS
Chrysene	µg/l	17	45	0.009	0.025	FEG-BAT/ABS
Diethyl phthalate	µg/l	62	156	0.035	0.088	FEG-BAT/ABS
Dimethyl phthalate	µg/l	15	36	0.008	0.020	FEG-BAT/ABS
Ethylbenzene	µg/l	25	83	0.014	0.047	FEG-BAT/ABS
Fluoranthene	µg/l	1.7	7.4	0.00229	0.00995	FEG-BAT/ABS
Fluorene	µg/l	17	45	0.009	0.025	FEG-BAT/ABS
Hexachloroethane	µg/l	16	42	0.009	0.023	FEG-BAT/ABS
Methyl Chloride	µg/l	66	146	0.037	0.083	FEG-BAT/ABS
Methylene Chloride	µg/l	31	69	0.017	0.039	FEG-BAT/ABS
Nitrobenzene	µg/l	21	52	0.012	0.029	FEG-BAT/ABS
Phenanthrene	µg/l	5	45	0.00672	0.025	FEG-BAT/ABS
Pyrene	µg/l	10	49	0.0135	0.027	FEG-BAT/ABS
Tetrachloroethylene	µg/l	17	43	0.009	0.024	FEG-BAT/ABS
1,1-Dichloroethane	µg/l	17	45	0.009	0.025	FEG-BAT/ABS

Effluent Limits						
Parameter	Units	Concentration		Loading (kg/day) <sup>a</sup>		Basis <sup>b</sup>
		30 day Average	Daily Maximum	30 day Average	Daily Maximum	
1,1-Dichloroethylene	µg/l	12	19	0.007	0.010	FEG-BAT/ABS
1,1,1-Trichloroethane	µg/l	16	42	0.009	0.023	FEG-BAT/ABS
1,1,2-Trichloroethane	µg/l	16	42	0.009	0.023	FEG-BAT/ABS
Benzo(A)Anthracene	µg/l	17	45	0.009	0.025	FEG-BAT/ABS
1,2-Dichloroethane	µg/l	52	162	0.029	0.092	FEG-BAT/ABS
1,2-Dichlorobenzene	µg/l	30	125	0.017	0.071	FEG-BAT/ABS
1,2-trans-Dichloroethylene	µg/l	16	42	0.012	0.030	FEG-BAT/ABS
1,2,4-Trichlorobenzene	µg/l	52	108	0.029	0.061	FEG-BAT/ABS
1,3-Dichlorobenzene	µg/l	24	34	0.013	0.019	FEG-BAT/ABS
1,4-Dichlorobenzene	µg/l	12	22	0.007	0.012	FEG-BAT/ABS
2-Chlorophenol	µg/l	24	75	0.029	0.042	FEG-BAT/ABS
2-Nitrophenol	µg/l	32	53	0.018	0.030	FEG-BAT/ABS
2,4-Dichlorophenol	µg/l	24	86	0.0323	0.048	FEG-BAT/ABS
2,4-Dimethylphenol	µg/l	14	28	0.008	0.016	FEG-BAT/ABS
2,4-Dinitrotoluene	µg/l	87	219	0.049	0.124	FEG-BAT/ABS
2,4-Dinitrophenol	µg/l	55	95	0.031	0.054	FEG-BAT/ABS
2,6-Dinitrotoluene	µg/l	120	493	0.068	0.279	FEG-BAT/ABS
4-Nitrophenol	µg/l	55	95	0.031	0.054	FEG-BAT/ABS
4,6-Dinitro-o-cresol	µg/l	60	213	0.034	0.121	FEG-BAT/ABS
Phenol	µg/l	12	20	0.007	0.011	FEG-BAT/ABS
Naphthalene	µg/l	17	45	0.009	0.025	FEG-BAT/ABS
Bis(2-ethylhexyl) phthalate	µg/l	18	215	0.0242	0.121	FEG-BAT/ABS
Di-N-Butylphthalate	µg/l	21	44	0.012	0.024	FEG-BAT/ABS
Vinyl Chloride	µg/l	80	206	0.045	0.117	FEG-BAT/ABS
Trichloroethylene	µg/l	16	42	0.009	0.023	FEG-BAT/ABS
Hexachlorobenzene	µg/l	12	22	0.007	0.012	FEG-BAT/ABS
Hexachlorobutadiene	µg/l	15	38	0.008	0.021	FEG-BAT/ABS
Chlorobenzene	µg/l	12	22	0.007	0.012	FEG-BAT/ABS
Flow Rate	MGD	-----Monitoring-----				M <sup>c</sup>
Mercury, Total (Low Level)	µg/l	12	1700	0.000017	0.00229	EP
Acute Toxicity <i>Ceriodaphnia dubia</i>	TUa	-----Monitoring-----				WET
Chronic Toxicity <i>Ceriodaphnia dubia</i>	TUc	-----Monitoring-----				WET
Residue, Total Filterable	mg/l	-----Monitoring-----				EP
1,3-Dichloropropylene	µg/l	22	34	0.012	0.019	FEG-BAT/ABS

Effluent Limits						
Parameter	Units	Concentration		Loading (kg/day) <sup>a</sup>		Basis <sup>b</sup>
		30 day Average	Daily Maximum	30 day Average	Daily Maximum	
CBOD <sub>5</sub> - Summer	mg/l	10	15	12	18	EP
CBOD <sub>5</sub> - Winter	mg/l	25	38	30	46	EP
Styrene	µg/l	25	83	0.014	0.047	BPJ

<sup>a</sup> Effluent loading limitations are based upon a design flow of 0.15 MGD.

<sup>b</sup> Definitions: **ABS** = Antibacksliding Rule (OAC 3745-33-05(E) and 40 CFR Part 122.44(l));  
**AD** = Antidegradation (OAC 3745-1-05);  
**BAT** = Best Available Technology economically achievable, Federal Effluent Guidelines, 40 CFR Part 414;  
**BPJ** = Best Professional Judgment;  
**BPT** = Best Practicable control Technology currently available, Federal Effluent Guidelines, 40 CFR, Part 414;  
**EP** = Existing Permit;  
**M** = Division of Surface Water Guidance #2, "National Pollutant Discharge Elimination System: Determination of Sampling Frequency Formula for Industrial Waste Discharges" recommends monitoring for this parameter;  
**PD** = Plant Design Criteria;  
**RP** = Reasonable Potential for exceeding water quality standards, and requiring water quality-based effluent limits and monitoring requirements in NPDES permits (3745-33-07(A));  
**WET** = Whole Effluent Toxicity (OAC 3745-33-07(B)) ;  
**WLA** = Wasteload Allocation procedures (OAC 3745-2);  
**WLA/IMZM** = Wasteload Allocation limited by Inside Mixing Zone Maximum;  
**WQS** = Ohio Water Quality Standards (OAC 3745-1).

<sup>c</sup> Monitoring of flow and other indicator parameters is specified to assist in the evaluation of effluent quality and treatment plant performance.