



Alabama Department of Environmental Management  
adem.alabama.gov

FEBRUARY 10, 2020

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Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

MR FRANK ESKRIDGE  
ATHENS UTILITIES  
POST OFFICE BOX 1089  
ATHENS AL 35612

Re: REVISED DRAFT LOCAL LIMITS  
ATHENS UTILITIES  
ATHENS WWTP  
NPDES PERMIT NO. AL0020206

Dear Mr. Eskridge:

This letter is to notify you that the Alabama Department of Environmental Management (ADEM) has revised the draft local limits document for the Athens WWTP based on the sampling data that you provided. A copy of this draft along with supporting information is attached for your review and comment. ADEM is requesting that your comments be received no later than 30 days from the date of this letter.

Following evaluation of any additional information provided, revised draft local limits will be developed if needed. If your facility has no further comments, ADEM will proceed with the development of final local limits based on the attached revised draft. After consideration of any comments received during the public notice period, a final determination on the local limits will be made. All permits issued to industrial users must comply with adopted local limits.

Should you have any questions about this process, please contact Theo Pinson by email at [tpinson@adem.alabama.gov](mailto:tpinson@adem.alabama.gov) or by phone at (334) 274-4202.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Ramsey".

Scott Ramsey, Chief  
Industrial Section  
Industrial/Municipal Branch  
Water Division

Attachments: Draft Local Limits  
Rationale for Local Limits  
Local Limits/Pass Through Calculations

CC: American Leakless Co  
Asahi Kasei Plastics  
Cast Products  
Federal Mogul Power Train LLC  
Steelcase Inc  
Nicholas Lowe  
Theo Pinson



# LOCAL LIMITS

**PUBLICLY OWNED TREATMENT WORKS:** ATHENS WWTP  
**LOCATION:** ATHENS, ALABAMA  
LIMESTONE COUNTY  
**PERMIT NUMBER:** AL0020206

## GENERAL PRETREATMENT PROHIBITIONS

No discharge to the Publicly Owned Treatment Works (POTW) shall exceed or otherwise violate the General Pretreatment Standards described in ADEM Administrative Code 335-6-5. Specifically the POTW shall ensure that discharges to their system comply with the following prohibitions to ensure protection of the treatment and collections systems and to ensure worker safety:

Pollutants which create a fire or explosion hazard including but not limited to waste streams with a closed cup flashpoint of less than 140 degrees Fahrenheit;

Pollutants which will cause corrosive structural damage to the treatment works but in no case discharges with a pH lower than 5.0 S.U. unless the treatment works are specifically designed to accommodate such discharges;

Solid or viscous pollutants in amounts which will cause obstruction to the flow in sewers or other interference with the operation of the treatment works;

Any pollutant, including oxygen demanding pollutants released in a discharge of such volume or strength as to cause interference in the treatment works;

Heat in amounts which will inhibit biological activity in the treatment plant resulting in interference, but in no case in such quantities that the temperature of the effluent at the treatment plant exceeds 104 degrees Fahrenheit unless the treatment plant is designed to accommodate such heat;

Pollutants which will result in the presence of toxic gases, vapors or fumes within the treatment works in a quantity that may cause acute worker health and safety problems;

Any trucked or hauled pollutants except at discharge points designated by the treatment works; and

Petroleum oil, nonbiodegradable cutting oil, or products of mineral origin in such amounts that will cause interference or pass through.

## GENERAL PRETREATMENT STANDARDS AND LOCAL LIMITS

### POLLUTANTS:

The total average daily loading of the substances from all sources shall not exceed the indicated mass listed below.

| <u>Parameter</u>            | <u>Allowable Average Daily Pollutant Load at Headworks of POTW</u><br>(lbs/day) |
|-----------------------------|---------------------------------------------------------------------------------|
| Arsenic, Total Recoverable  | 0.1889                                                                          |
| Cadmium, Total Recoverable  | 0.2963                                                                          |
| Chromium, Total Recoverable | 375.3                                                                           |
| Copper, Total Recoverable   | 38.21                                                                           |
| Cyanide, Free               | 0.5909                                                                          |
| Lead, Total Recoverable     | 29.96                                                                           |
| Mercury, Total Recoverable  | 0.0075                                                                          |
| Nickel, Total Recoverable   | 30.23                                                                           |
| Silver, Total Recoverable   | 1.651                                                                           |
| Zinc, Total Recoverable     | 75.06                                                                           |

No future loading above the domestic wastewater concentration of Cyanide will be allowed. All new or expanding industrial dischargers containing these pollutants shall be limited as indicated below:

| <u>Parameter</u> | <u>Allowable Average Concentration</u> |
|------------------|----------------------------------------|
|                  | (mg/l)                                 |
| Cyanide, Free    | 0.04                                   |

**HYDRAULIC LOADING:**

The hydraulic loading on an average basis is the design capacity of the treatment plant which is 9.0 million gallons per day.

**ORGANIC LOADING:**

The organic loading (CBOD<sub>5</sub>) is the design capacity of the treatment plant which is 12,535 pounds per day.

**SOLIDS LOADING**

The Total Suspended Solids loading (TSS) is the design capacity of the treatment plant which is 15,012 pounds per day.

**EFFECTIVE DATE:**

**ISSUANCE DATE:**

**DRAFT**

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**Alabama Department of Environmental Management**

## Rationale for Local Limits

Athens WWTP (AL0020206)  
9.0 MGD activated sludge facility  
Athens / Limestone County

Reissuance  
Prepared Date: 10/16/2018  
Prepared By: Ed Hughes  
Revised: 1/21/2020

### Nonconventional Pollutants:

#### Pass Through:

Allowable pollutant loadings were based on state water quality standards applicable to streams with a use designated of Fish & Wildlife. Local limits calculations were performed using a receiving stream 7Q10 of 0.13cfs, 1Q10 of 0.1cfs, an annual average flow of 15 cfs and a stream hardness of 89.8 mg/l as CaCO<sub>3</sub>. The treatment plant removal rates and untreated domestic sewage pollutant concentrations were based on Best Professional Judgment using literature values and EPA recommended levels as the basis unless site specific data was available. Calculations estimate the allowable quantity of heavy metals (measured as Total Recoverable) and Free Cyanide that can be discharged into the POTW to ensure that state water quality standards for aquatic toxicity and human health criteria are met in the receiving stream during critical flow conditions. Because only the portion of heavy metals present in dissolved form is "bioavailable" to aquatic life, the calculations which evaluate aquatic toxicity take into account the relationship between "dissolved" metals and metals measured using the Total Recoverable test procedure.

There are no other significant dischargers in this stream segment that need to be considered in the development of the local limits for this POTW.

The allowable pollutant loadings based on pass through concerns are located in column 11 of the Local Limits-Pass Through (LL-PT) spreadsheet.

#### Interference:

The Department evaluated the potential for processes at the POTW to be inhibited as result of the pollutant loading entering the treatment works. Inhibition values were based on Best Professional Judgment using literature values and EPA recommended levels as the basis unless site specific information was provided by the POTW. The allowable pollutant loadings based on inhibition concerns are located in column 13 of the LL-PT spreadsheet.

#### Sludge Disposal:

The POTW disposes of sludge by pumping to a storage unit for continued degradation. For POTWs that use land application as a means of disposal the LL-PT spreadsheet calculates the allowable pollutant loading to ensure that metal concentrations in the sludge comply with EPA 503 regulations for land application of biosolids. The results of these calculations are located in column 14 of the spreadsheet.

Column 15 of the LL-PT spreadsheet indicates the most stringent of the above three criteria. These loadings are considered the POTW's total headworks capacity for the pollutants of concern.

The LL-PT spreadsheet also lists the current loading of the pollutants of concern from domestic/commercial and industrial sources and determines the remaining capacity currently available. Domestic/commercial loadings are indicated in Columns 16 and current industrial loadings are shown in column 17 (a listing of each significant industrial user and their permit limits and average reported discharge level for pollutants without permit limits is shown on the attached Significant Industrial Users sheet). Column 18 of that spreadsheet shows the remaining capacity after subtracting the current loadings. Negative values indicate that no additional capacity is available for these pollutants. Specifically, these calculations estimate that no additional loading of Cyanide above the domestic sewage concentration can be allowed; therefore, new and expanded discharges shall be limited to domestic sewage concentration.

The limiting factor for each of these pollutants is shown below:

| <u>Parameter</u> | <u>Limiting Factor</u> |
|------------------|------------------------|
| Cyanide, Free    | Water Quality          |

It should be noted that the available pollutant loadings shown in column 18 have been reduced by 10%, which is the percent of total capacity reserved for future growth.

### **Conventional Pollutants**

#### Temperature:

The Department is not aware of any specific circumstances related to this POTW which require a temperature limitation more stringent than general standards and prohibitions contained in ADEM Administrative code 335-6-5-.03(2)(e).

#### pH:

The Department is not aware of any specific circumstances related to this POTW which require a minimum pH limitation more stringent than general standards and prohibitions contained in ADEM Administrative code 335-6-5-.03(2)(b).

#### Hydraulic loading:

The hydraulic loading is the design capacity of the treatment plant as indicated by the POTW, 9.0 MGD.

#### Organic loading:

The organic loading (CBOD<sub>5</sub>) is the design capacity of the treatment plant. This loading was calculated using the design flow of the POTW and an influent CBOD<sub>5</sub> concentration of 167 mg/l.

#### Total Suspended Solids loading

The Total Suspended Solids (TSS) loading was calculated using the design flow of the POTW and an influent TSS concentration of 200 mg/l.

While ADEM develops local limits and reviews compliance, POTWs are responsible for ensuring proper management of Significant Industrial Users and other sources to meet their NPDES limits and to prevent pass through and interference problems and to ensure compliance with the prohibitions contained in ADEM

Administrative Code 335-6-5-.03 for protection of the treatment works, collection system and worker safety. The POTWs' responsibilities include establishing any additional limitations via local ordinances, etc. to protect the POTW and comply with their permit.

**Revision (1/21/2020):**

The water system collected data to determine the pollutant levels in the influent and effluent to the POTW. In addition, samples were collected in the sanitary sewer (domestic waste only) and from three commercial sources, (industries that are not considered significant industrial users due to their low volume and the nature of their operations). From the influent/effluent testing results, the spreadsheet calculated local pollutant removal rates. With the exception of Cadmium and Silver, the spreadsheet used the local removal rates to determine local limits for the analyzed pollutants. Cadmium and Silver concentrations were below method detection levels; therefore, accurate removal rates could not be calculated. Local limits were determined for these pollutants using default removal rates. The pollutant loadings associated with the commercial sources were added to the table of industrial sources on the SIUs page of the spreadsheet.

Based on the use of local data and the revisions discussed above, Cyanide was determined to be the only limited pollutant.



|                                             |     |            |
|---------------------------------------------|-----|------------|
| TYPE OF TREATMENT =                         | 2   | Act Sludge |
| TREATMENT INCLUDE NITIFICATION              | No  |            |
| <b>SLUDGE DISPOSAL</b>                      |     |            |
| DOES THE POTW HAVE SECONDARY CLAS           | Yes |            |
| AVERAGE TONS OF SLUDGE PER DAY (DRY WEIGHT) | N/A |            |
| IS SLUDGE LAND APPLIED?                     | No  |            |
| <b>GROWTH ALLOCATION</b>                    |     |            |
| % ALLOCATION RESERVED FOR FUTURE GROWTH =   | 10  |            |

| PARAMETER            | 7) MAX WQ<br>INSTREAM<br>(LBS/D) | 8) ALLOCATION<br>FROM<br>BACKGROUND<br>(LBS/D) | 9) ALLOWABLE<br>DISC FROM<br>POTW<br>(LBS/D) | 10) REMOVAL<br>RATE<br>(%) | 11) ALLOWABLE<br>DISCHARGE<br>(WQ / HH)<br>(LBS/D) | 12) INHIBITION<br>TRESHOLD<br>CONC<br>(MG/L) | 13) ALLOWABLE<br>DISCHARGE<br>(INHIBITION)<br>(LBS/D) | 14) ALLOWABLE<br>DISCHARGE<br>(SLUDGE)<br>(LBS/D) | 15) ALLOWABLE<br>DISCHARGE<br>LOCAL LIMIT<br>(LBS/D) | 16) DOMESTIC<br>INFLUENT<br>LOADING<br>(LBS/D) | 17) INDUSTRIAL<br>INFLUENT<br>LOADING<br>(LBS/D) | 18) AVAILABLE<br>CAPACITY<br>FOR GROWTH<br>(LBS/D) | LIMITING<br>FACTOR |
|----------------------|----------------------------------|------------------------------------------------|----------------------------------------------|----------------------------|----------------------------------------------------|----------------------------------------------|-------------------------------------------------------|---------------------------------------------------|------------------------------------------------------|------------------------------------------------|--------------------------------------------------|----------------------------------------------------|--------------------|
| ANTIMONY, TR         | 28.2839                          | 0                                              | 28.2839                                      | 43                         | 49.4968                                            |                                              |                                                       |                                                   | 28.2839                                              | 0.0726                                         | 0.0000                                           | 25.3901                                            | WATER QUALITY      |
| ARSENIC, TRIVALENT   | 0.0472                           | 0                                              | 0.0472                                       | 75                         | 0.1889                                             | 0.100                                        | 7.5060                                                | ---                                               | 0.1889                                               | 0.0726                                         | 0.0000                                           | 0.1047                                             | WATER QUALITY      |
| CADMIUM, TR          | 0.0978                           | 0                                              | 0.0978                                       | 67                         | 0.2963                                             | 1.000                                        | 75.0600                                               | ---                                               | 0.2963                                               | 0.0363                                         | 0.0717                                           | 0.1694                                             | WATER QUALITY      |
| CHROMIUM, TR         | 34.3949                          | 0                                              | 34.3949                                      | 91                         | 383.7752                                           | 5.000                                        | 375.3000                                              | ---                                               | 375.3000                                             | 0.0928                                         | 3.9980                                           | 334.0900                                           | INHIBITION         |
| CHROMIUM, HEXAVALENT | 0.8334                           | 0                                              | 0.8334                                       | 83                         | 4.9021                                             | 1.000                                        | 75.0600                                               | ---                                               | 4.9021                                               | 0.0000                                         | 0.0000                                           | 4.4119                                             | WATER QUALITY      |
| COPPER, TR           | 2.2742                           | 0                                              | 2.2742                                       | 94                         | 38.2133                                            | 1.000                                        | 75.0600                                               | ---                                               | 38.2133                                              | 0.5095                                         | 4.6351                                           | 29.4919                                            | WATER QUALITY      |
| CYANIDE, FREE        | 0.3940                           | 0                                              | 0.3940                                       | 33                         | 0.5909                                             | 0.100                                        | 7.5060                                                | ---                                               | 0.5909                                               | 0.6095                                         | 0.0941                                           | -0.1014                                            | WATER QUALITY      |
| LEAD, TR             | 1.2914                           | 0                                              | 1.2914                                       | 96                         | 29.9610                                            | 1.000                                        | 75.0600                                               | ---                                               | 29.9610                                              | 0.0799                                         | 0.1170                                           | 26.7876                                            | WATER QUALITY      |
| MERCURY, TR          | 0.0030                           | 0                                              | 0.0030                                       | 60                         | 0.0075                                             | 0.100                                        | 7.5060                                                | ---                                               | 0.0075                                               | 0.0000                                         | 0.0000                                           | 0.0068                                             | WATER QUALITY      |
| MOLYBDENUM           |                                  | 0                                              |                                              |                            |                                                    |                                              |                                                       | ---                                               | 0.0000                                               | 0.0000                                         | 0.0000                                           |                                                    |                    |
| NICKEL, TR           | 10.1201                          | 0                                              | 10.1201                                      | 67                         | 30.2293                                            | 1.000                                        | 75.0600                                               | ---                                               | 30.2293                                              | 0.1874                                         | 5.5578                                           | 22.0358                                            | WATER QUALITY      |
| SELENIUM             | 0.0379                           | 0                                              | 0.0379                                       | 50                         | 0.0758                                             |                                              |                                                       | ---                                               | 0.0758                                               | 0.0000                                         | 0.0000                                           | 0.0682                                             | WATER QUALITY      |
| SILVER, TR           | 0.4126                           | 0                                              | 0.4126                                       | 75                         | 1.6505                                             | 0.250                                        | 18.7650                                               | ---                                               | 1.6505                                               | 0.0363                                         | 0.5605                                           | 0.9483                                             | WATER QUALITY      |
| ZINC, TR             | 34.8278                          | 0                                              | 34.8278                                      | 87                         | 273.9404                                           | 1.000                                        | 75.0600                                               | ---                                               | 75.0600                                              | 14.2850                                        | 3.4682                                           | 51.5753                                            | INHIBITION         |

Comments

Item 1: Allowable concentration instream based on above noted stream conditions and state standard to protect aquatic life from chronic toxicity.

Item 2: Mass of pollutant allowed instream based on above noted stream conditions and chronic criteria calculated as shown below:

Item 2 = stream / Q10 x 8.34 x Item 1. If stream segment is tidally influenced, the more stringent of freshwater and saltwater criteria is used.

Item 3: Allowable concentration instream based above noted stream conditions and state standard to protect aquatic life from acute toxicity.

Item 4: Mass of pollutant allowed instream based on above noted stream conditions and acute criteria and calculated as shown below:

Item 4 = stream / Q10 x 8.34 x Item 3. For LWF streams, Item 4 = stream / Q2 x 8.34 x Item 3.

If stream segment is tidally influenced, the more stringent of freshwater and saltwater criteria is used.

Item 5: Allowable concentration instream based on above noted stream conditions and state human health standard for a stream with this use classification.

Item 6: Mass of pollutant allowed instream based on above noted stream condition the human health standard and calculated as shown below:

Item 6 = Annual average stream flow x 8.34 x Item 5 (for carcinogens) and 7Q10 x 8.34 x Item 5 (for non-carcinogens).

Item 7: The most stringent of the requirements calculated in Items 2, 4 and 6.

Item 8: Amount allocated to other facilities discharging to this stream segment.

Item 9: Remaining allocation available.

Item 10: Pollutant removal rates based on the treatment process.



Item 11: The calculated allowable discharge into the POTW based on water quality and human health concerns.

Item 12: Concentration of pollutant that could cause inhibition of biological processes utilized at the treatment plant.

Item 13: Allowable discharge into the POTW based on levels to prevent inhibition of biological treatment processes.

Item 14: Allowable discharge into the POTW based on levels to meet EPA 503 standards for land application of sludge, if sludge is land applied.

Item 15: Allowable discharge into the POTW based on the more stringent of Items 11, Item 13 and item 14 requirements. This column contains the Local Limits for this POTW.

Item 16: Domestic influent (lbs/d) based on domestic flow and sampled domestic influent data if available or literature values if not.

Item 17: Industrial influent (lbs/d) based on monthly average permit limits and actual average values for the past 2 to 5 years (depending on availability) for "monitor only" pollutants as shown on S!Us sheet. Values reported as less than detect are not included in average calculation.

Item 18: Available capacity remaining for new sources after subtracting capacity being utilized by industrial sources, domestic sources (including commercial sources and seplage disposal) and capacity reserved for future growth.

## SIGNIFICANT INDUSTRIAL USERS

| PERMITTEE                          | AVG FLOW<br>(MGD) | DAILY AVG<br>ANTIMONY<br>(MG/L) | DAILY AVG<br>ARSENIC<br>(MG/L) | DAILY AVG<br>CADMIUM<br>(MG/L) | DAILY AVG<br>CHROMIUM<br>(MG/L) | DAILY AVG<br>HEX CHROM<br>(MG/L) | DAILY AVG<br>COPPER<br>(MG/L) | DAILY AVG<br>CYANIDE<br>(MG/L) | DAILY AVG<br>LEAD<br>(MG/L) | DAILY AVG<br>MERCURY<br>(MG/L) | DAILY AVG<br>Molybdenum<br>(mg/l) | DAILY AVG<br>NICKEL<br>(MG/L) | DAILY AVG<br>SELENIUM<br>(MG/L) | DAILY AVG<br>SILVER<br>(MG/L) | DAILY AVG<br>ZINC<br>(MG/L) |
|------------------------------------|-------------------|---------------------------------|--------------------------------|--------------------------------|---------------------------------|----------------------------------|-------------------------------|--------------------------------|-----------------------------|--------------------------------|-----------------------------------|-------------------------------|---------------------------------|-------------------------------|-----------------------------|
| American Leakless (IU084200563) 01 | 0.0017            | 0.0000                          | 0.0000                         | 0.0000                         | <b>0.1194</b>                   | 0.0000                           | 0.0000                        | <b>0.0400</b>                  | 0.0000                      | 0.0000                         | 0.0000                            | 0.0000                        | 0.0000                          | 0.0000                        | <b>0.3160</b>               |
| American Leakless (IU084200563) 02 | 0.0003            | 0.0000                          | 0.0000                         | 0.0000                         | <b>0.4396</b>                   | 0.0000                           | 0.0000                        | <b>0.0400</b>                  | 0.0000                      | 0.0000                         | 0.0000                            | 0.0000                        | 0.0000                          | 0.0000                        | <b>1.2390</b>               |
| Asahi Kasei Plastics (IU084200564) | 0.0054            | 0.0000                          | 0.0000                         | 0.0000                         | 0.0000                          | 0.0000                           | 0.0000                        | 0.0000                         | 0.0000                      | 0.0000                         | 0.0000                            | 0.0000                        | 0.0000                          | 0.0000                        | 0.0000                      |
| Cast Products (IU084200600)        | 0.0002            | 0.0000                          | 0.0000                         | 0.0000                         | 0.0000                          | 0.0000                           | <b>0.1187</b>                 | 0.0000                         | <b>0.1103</b>               | 0.0000                         | 0.0000                            | 0.0000                        | 0.0000                          | 0.0000                        | <b>0.1217</b>               |
| Federal Mogul (IU084200358)        | <b>0.2000</b>     | 0.0000                          | 0.0000                         | <b>0.0030</b>                  | <b>1.7100</b>                   | 0.0000                           | <b>2.0700</b>                 | <b>0.0400</b>                  | <b>0.0500</b>               | 0.0000                         | 0.0000                            | <b>2.3800</b>                 | 0.0000                          | <b>0.2400</b>                 | <b>1.4800</b>               |
| Steelcase (IU084200196)            | <b>0.0800</b>     | 0.0000                          | 0.0000                         | <b>0.1000</b>                  | <b>1.7100</b>                   | 0.0000                           | <b>2.0700</b>                 | <b>0.0400</b>                  | <b>0.0500</b>               | 0.0000                         | 0.0000                            | <b>2.3800</b>                 | 0.0000                          | <b>0.2400</b>                 | <b>1.4800</b>               |
| Commercial (non-regulated) sources | 0.0015            | 0.000000                        | 0.0000000                      | 0.0005036                      | 0.0031890                       | 0.0000000                        | 0.0803360                     | 0.0040265                      | 0.0079620                   | 0.0000000                      | 0.0000000                         | 0.0047080                     | 0.0000000                       | 0.0005036                     | 0.3420600                   |
| Total Industrial flow              | 0.2891            |                                 |                                |                                |                                 |                                  |                               |                                |                             |                                |                                   |                               |                                 |                               |                             |

Monthly average permit limits are listed in bold print.

Other values are based on a minimum of 24 months of data if available as reported on DMRs (for parameters with testing requirements in permits).

| PERMITTEE                          | AVG FLOW<br>(MGD) | DAILY AVG<br>ANTIMONY<br>(LBS/D) | DAILY AVG<br>ARSENIC<br>(LBS/D) | DAILY AVG<br>CADMIUM<br>(LBS/D) | DAILY AVG<br>CHROMIUM<br>(LBS/D) | DAILY AVG<br>HEX CHROM<br>(LBS/D) | DAILY AVG<br>COPPER<br>(LBS/D) | DAILY AVG<br>CYANIDE<br>(LBS/D) | DAILY AVG<br>LEAD<br>(LBS/D) | DAILY AVG<br>MERCURY<br>(LBS/D) | DAILY AVG<br>Molybdenum<br>(LBS/D) | DAILY AVG<br>NICKEL<br>(LBS/D) | DAILY AVG<br>SELENIUM<br>(LBS/D) | DAILY AVG<br>SILVER<br>(LBS/D) | DAILY AVG<br>ZINC<br>(LBS/D) |
|------------------------------------|-------------------|----------------------------------|---------------------------------|---------------------------------|----------------------------------|-----------------------------------|--------------------------------|---------------------------------|------------------------------|---------------------------------|------------------------------------|--------------------------------|----------------------------------|--------------------------------|------------------------------|
| American Leakless (IU084200563) 01 | 0.0017            | 0.0000                           | 0.0000                          | 0.0000                          | 0.0017                           | 0.0000                            | 0.0000                         | 0.0006                          | 0.0000                       | 0.0000                          | 0.0000                             | 0.0000                         | 0.0000                           | 0.0000                         | 0.0045                       |
| American Leakless (IU084200563) 02 | 0.0003            | 0.0000                           | 0.0000                          | 0.0000                          | 0.0011                           | 0.0000                            | 0.0000                         | 0.0001                          | 0.0000                       | 0.0000                          | 0.0000                             | 0.0000                         | 0.0000                           | 0.0000                         | 0.0031                       |
| Asahi Kasei Plastics (IU084200564) | 0.0054            | 0.0000                           | 0.0000                          | 0.0000                          | 0.0000                           | 0.0000                            | 0.0000                         | 0.0000                          | 0.0000                       | 0.0000                          | 0.0000                             | 0.0000                         | 0.0000                           | 0.0000                         | 0.0000                       |
| Cast Products (IU084200600)        | 0.0002            | 0.0000                           | 0.0000                          | 0.0000                          | 0.0000                           | 0.0000                            | 0.0002                         | 0.0000                          | 0.0002                       | 0.0000                          | 0.0000                             | 0.0000                         | 0.0000                           | 0.0000                         | 0.0002                       |
| Federal Mogul (IU084200358)        | 0.2               | 0.0000                           | 0.0000                          | 0.0050                          | 2.8523                           | 0.0000                            | 3.4528                         | 0.0667                          | 0.0834                       | 0.0000                          | 0.0000                             | 3.9698                         | 0.0000                           | 0.4003                         | 2.4666                       |
| Steelcase (IU084200196)            | 0.08              | 0.0000                           | 0.0000                          | 0.0667                          | 1.1409                           | 0.0000                            | 1.3811                         | 0.0267                          | 0.0334                       | 0.0000                          | 0.0000                             | 1.5879                         | 0.0000                           | 0.1601                         | 0.9875                       |
| Commercial (non-regulated) sources | 0.0015            | 0.0000                           | 0.0000                          | 0.0000                          | 0.0000                           | 0.0000                            | 0.0010                         | 0.0001                          | 0.0001                       | 0.0000                          | 0.0000                             | 0.0001                         | 0.0000                           | 0.0000                         | 0.0043                       |
|                                    | 0.2891            | 0.0000                           | 0.0000                          | 0.0717                          | 3.9960                           | 0.0000                            | 4.8351                         | 0.0941                          | 0.1170                       | 0.0000                          | 0.0000                             | 5.5578                         | 0.0000                           | 0.5605                         | 3.4682                       |

**CURRENT PERMITTED INDUSTRIAL LOADING TO POTW\* (LBS/DAY)**

| PARAMETER  |        |
|------------|--------|
| ANTIMONY   | 0.0000 |
| ARSENIC    | 0.0000 |
| CADMIUM    | 0.0717 |
| CHROMIUM   | 3.9960 |
| HEX CHROM  | 0.0000 |
| COPPER     | 4.8351 |
| CYANIDE    | 0.0941 |
| LEAD       | 0.1170 |
| MERCURY    | 0.0000 |
| Molybdenum | 0.0000 |
| NICKEL     | 5.5578 |
| SELENIUM   | 0.0000 |
| SILVER     | 0.5605 |
| ZINC       | 3.4682 |

\*Including unregulated sources TRIS USA, T & C Stamping, ROW Mfg