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JUNE 2, 2020

MR DAVID DENARD  
DIRECTOR  
JEFFERSON COUNTY COMMISSION - ENVIRONMENTAL SERVICE DEPARTMENT  
716 RICHARD ARRINGTON JR BLVD N  
BIRMINGHAM AL 35203

Re: DRAFT LOCAL LIMITS  
JEFFERSON COUNTY COMMISSION  
TRUSSVILLE WWTP  
NPDES PERMIT NO. AL0022934

Dear Mr. Denard:

The Alabama Department of Environmental Management transmitted proposed local limits documents for your review on October 19, 2018. Since that time, there have been several revisions to the local limits program that may have affected the allowable headworks loading to the Trussville WWTP. To ensure that adequate opportunity has been provided to review the most updated version of the proposed local limits, the Department has included the updated documents as an attachment to this letter and is requesting that any questions or comments be submitted within 10 days. Assuming you are in agreement with the local limits as proposed, it is the Department's intent to proceed to public notice in July.

Should you have any questions about this process, please contact Alex Chavers by email at [achavers@adem.alabama.gov](mailto:achavers@adem.alabama.gov) or by phone at (334) 271-7851.

Sincerely,

A handwritten signature in black ink, appearing to be "S Ramsey", enclosed in a circular scribble.

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

CC: Margaret Tanner/Jefferson County Commission  
Amerex Corporation  
Carpet and Rugs Backing (CRB Birmingham)  
Dustin Stokes  
Alex Chavers

**Birmingham Branch**  
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# LOCAL LIMITS

**PUBLICLY OWNED TREATMENT WORKS:** TRUSSVILLE WWTP  
**LOCATION:** TRUSSVILLE, ALABAMA  
JEFFERSON COUNTY  
**PERMIT NUMBER:** AL0022934

## 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> (lbs/day)
Arsenic, Total Recoverable	0.1175
Cadmium, Total Recoverable	0.1009
Chromium, Total Recoverable	62.12
Copper, Total Recoverable	5.212
Cyanide, Free	0.5596
Lead, Total Recoverable	0.9756
Mercury, Total Recoverable	0.0033
Nickel, Total Recoverable	5.616
Silver, Total Recoverable	0.3851
Zinc, Total Recoverable	33.36

No future loading above the domestic wastewater concentration of Cadmium, Cyanide or Lead 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)
Cadmium, Total Recoverable	0.003
Cyanide, Free	0.04
Lead, Total Recoverable	0.05

**HYDRAULIC LOADING:**

The hydraulic loading on an average basis is the design capacity of the treatment plant which is 4.0 million gallons per day.

**ORGANIC LOADING:**

The organic loading (BOD<sub>5</sub>) is the design capacity of the treatment plant which is 5571 pounds per day.

**SOLIDS LOADING**

The Total Suspended Solids loading (TSS) is the design capacity of the treatment plant which is 6672 pounds per day.

**EFFECTIVE DATE:**

**ISSUANCE DATE:**

**DRAFT**

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**Alabama Department of Environmental Management**

## Rationale for Local Limits

Trussville WWTP (AL0022934)  
4.0 MGD activated sludge facility  
Trussville/ Jefferson County

Reissuance  
Prepared Date: 9/25/2018  
Prepared By: Ed Hughes  
Revised Date: 4/2/2019

### 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 0.0 cfs, 1Q10 of 0.0 cfs, an annual average flow of 33.4 cfs and a stream hardness of 93.89 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.

This segment of the Cahaba River receives treated wastewater from several other sources. The water quality model lists Hoover Inverness, Hoover Riverchase and Cahaba Mobile Home Estates as additional discharges. In view of the relatively low volume of these discharges and lack of significant metal loadings from these sources, they were considered insignificant and not included in these local limit calculations.

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 land application. According to the most recent MWPP report, this plant generated 935 dry metric tons of sludge annually based on an annual average flow of 2.1 MGD. Of this total 272 metric tons were land applied. For the purpose of developing local limits for this site, it is assumed that all sludge will be land applied. At the design flow of 4 MGD the POTW would generate 5.38 US tons per day. 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 User 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 Cadmium, Cyanide or Lead above the domestic sewage concentration can be allowed; therefore, new and expanded discharges shall be limited to domestic sewage concentrations. The limiting factor for each of these pollutants is shown below:

<u>Parameter</u>	<u>Limiting Factor</u>
Cadmium, Total Recoverable	Water Quality
Cyanide, Free	Water Quality
Lead, Total Recoverable	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, 4.0 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 Date (4/2/2019):**

Local limits were calculated using the most recent version of the local limit spreadsheet. Allowable loadings were changed to be consistent with calculated values from the updated document. The above discussion of sludge disposal was revised to utilize actual data provided by the POTW's MWSS report to determine loading limitations related to this concern. The previous version used assumed values.

**LOCAL LIMIT/ PASS THROUGH CALCULATIONS**

POTW NAME: Jefferson Co Trussville WWTP  
 NPDES PERMIT NUMBER: AL0022934

DATE PREPARED: 4/1/2019  
 PREPARED BY: Ed Hughes  
 REVISED DATE: 2/13/2020

STREAM DATA AND POTW FLOW DATA					
RECEIVING STREAM CLASSIFICATION	=	F & W	0	RECEIVING STREAM TIDALLY INFLUENCED =	No
POTW DESIGN FLOW	=		4 MGD		
FLOW FROM OTHER CONTRIBUTORS	=		MGD		
DOMESTIC FLOW	=		3.9847 MGD		
7Q10	=		0 CFS	OR	0.00 MGD
1Q10	=		0.00 CFS	OR	0.00 MGD
7Q2	=		CFS	OR	0.00 MGD
ANNUAL AVG FLOW	=		33.4 CFS	OR	21.58 MGD
STREAM HARDNESS (DEFAULT VALUE 100)	=		93.89 MG/L AS CaCO3		

ALLOWABLE LOADING TO STREAM BASED ON WATER QUALITY AND HH STANDARDS										
PARAMETER	1) CHRONIC	SW CHRONIC	2) MAX W Q	3) ACUTE	SW ACUTE	4) MAX W Q	5) HUMAN	6) MAX W Q	7) WQ / HH	PARAMETER
	TOXICITY (MG/L)	TOXICITY (MG/L)	INSTREAM (LBS/D)	TOXICITY (MG/L)	TOXICITY (MG/L)	INSTREAM (LBS/D)	HEALTH (MG/L)	INSTREAM (LBS/D)	BASED DISC LEVEL (LBS/D)	
ANTIMONY, TOTAL RECOVERABLE	----	----	----	----	----	----	0.3733333	12.454	12.454	ANTIMONY, TR
ARSENIC, TRIVALENT	0.1500	----	5.004	0.3400	----	11.342	0.00030	0.065	0.065	ARSENIC, TRI
CADMIUM, TOT RECOVERABLE	0.0002	----	0.033	0.0019	----	0.268	----	----	0.033	CADMIUM, TR
CHROMIUM, TOT RECOVERABLE	0.0704	----	11.181	0.5411	----	85.956	----	----	11.181	CHROMIUM, TR
CHROMIUM, HEXAVALENT	0.0110	----	0.367	0.0160	----	0.534	----	----	0.367	CHROMIUM, HEX
COPPER, TOTAL RECOVERABLE	0.0085	----	0.730	0.0126	----	1.087	----	----	0.730	COPPER, TR
CYANIDE, FREE	0.0052	----	0.173	0.0220	----	0.734	9.3333	311.36	0.173	CYANIDE, FREE
LEAD, TOT RECOVERABLE	0.0023	----	0.380	0.0603	----	9.764	----	----	0.380	LEAD, TR
MERCURY, TOT RECOVERABLE	0.000012	----	0.001	0.0024	----	0.265	0.0000424	0.001	0.00133	MERCURY, TR
MOLYBDENUM	----	----	----	----	----	----	----	----	----	MOLYBDENUM
NICKEL, TOT RECOVERABLE	0.0493	----	3.257	0.4439	----	29.325	0.9929078	33.123	3.257	NICKEL, TR
SELENIUM, TOTAL RECOVERABLE	0.0005	----	0.017	0.0020	----	0.067	2.4305556	81.083	0.017	SELENIUM, TR
SILVER, TOT RECOVERABLE	----	----	----	0.0029	----	0.096	----	----	0.096	SILVER, TR
ZINC, TOT RECOVERABLE	0.1120	----	11.322	0.1111	----	11.230	14.8936170	496.85	11.230	ZINC, TR

		Antimony	Arsenic	Cadmium	Chromium, To	Chromium, VI	Copper	Cyanide	Lead	Mercury	Molybdenum	Nickel
DOMESTIC	DATA VALUE	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	LIT VALUE	0.0010	0.0010	0.0030	0.0500	0.0000	0.0600	0.0400	0.0500	0.0000	0.0000	0.0200
		Selenium	Silver	Zinc								
	DATA VALUE	0.0000	0.0000	0.0000								
	LIT VALUE	0.0000	0.0100	0.1800								

TYPE OF TREATMENT =	2	Act Sludge	<b>SLUDGE DISPOSAL</b>	
TREATMENT INCLUDE NITIFICATION?	No		DOES THE POTW HAVE SECONDARY CLARIFICATION?	Yes
			AVERAGE TONS OF SLUDGE PER DAY (DRY WEIGHT)	5.38
			IS SLUDGE LAND APPLIED?	Yes
			<b>GROWTH ALLOCATION</b>	
			% ALLOCATION RESERVED FOR FUTURE GROWTH =	10

PARAMETER	7) MAX WQ INSTREAM (LBS/D)	8) ALLOCATION FROM BACKGROUND (LBS/D)	9) ALLOWABLE DISC FROM POTW (LBS/D)	10) REMOVAL RATE (%)	11) ALLOWABLE DISCHARGE (WQ / HH) (LBS/D)	12) INHIBITION TRESHOLD CONC (MG/L)	13) ALLOWABLE DISCHARGE (INHIBITION) (LBS/D)	14) ALLOWABLE DISCHARGE (SLUDGE) (LBS/D)	15) ALLOWABLE DISCHARGE LOCAL LIMIT (LBS/D)	16) DOMESTIC INFLUENT LOADING (LBS/D)	17) INDUSTRIAL INFLUENT LOADING (LBS/D)	18) AVAILABLE CAPACITY FOR GROWTH (LBS/D)	LIMITING FACTOR
ANTIMONY, TOTAL RECOVERABLE	12.4544	0	12.4544	0	12.4544				12.4544	0.0332	0.0000	11.1791	WATER QUALITY
ARSENIC, TRIVALENT	0.0646	0	0.0646	45	0.1175	0.100	3.3360	1.793333333	0.1175	0.0332	0.0000	0.0759	WATER QUALITY
CADMIUM, TOT RECOVERABLE	0.0333	0	0.0333	67	0.1009	1.000	33.3600	1.365074627	0.1009	0.0997	0.0011	0.0000	WATER QUALITY
CHROMIUM, TOT RECOVERABLE	11.1811	0	11.1811	82	62.1173	5.000	166.8000	-----	62.1173	1.6616	0.2141	54.2175	WATER QUALITY
CHROMIUM, HEXVALENT	0.3670	0	0.3670	83	2.1586	1.000	33.3600	-----	2.1586	0.0000	0.0000	1.9427	WATER QUALITY
COPPER, TOTAL RECOVERABLE	0.7296	0	0.7296	86	5.2116	1.000	33.3600	53.8	5.2116	1.9939	0.2590	2.6628	WATER QUALITY
CYANIDE, FREE	0.1735	0	0.1735	69	0.5596	0.100	3.3360	-----	0.5596	1.3293	0.0050	-0.6972	WATER QUALITY
LEAD, TOT RECOVERABLE	0.3805	0	0.3805	61	0.9756	1.000	33.3600	14.81704918	0.9756	1.6616	0.0063	-0.6230	WATER QUALITY
MERCURY, TOT RECOVERABLE	0.0013	0	0.0013	60	0.0033	0.100	3.3360	1.0222	0.0033	0.0000	0.0000	0.0030	WATER QUALITY
MOLYBDENUM		0						0.807	0.8070	0.0000	0.0000	-----	SLUDGE
NICKEL, TOT RECOVERABLE	3.2571	0	3.2571	42	5.6157	1.000	33.3600	10.76	5.6157	0.6646	0.2977	4.1879	WATER QUALITY
SELENIUM	0.0167	0	0.0167	50	0.0334			2.152	0.0334	0.0000	0.0000	0.0300	WATER QUALITY
SILVER, TOT RECOVERABLE	0.0963	0	0.0963	75	0.3851	0.250	8.3400	-----	0.3851	0.3323	0.0300	0.0205	WATER QUALITY
ZINC, TOT RECOVERABLE	11.2297	0	11.2297	79	53.4747	1.000	33.3600	102.1518987	33.3600	5.9818	0.1851	24.4737	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 7Q10 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 1Q10 x 8.34 x Item 3. For LWF streams, Item 4 = stream 7Q2 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 SIUs 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 septage disposal) and capacity reserved for future growth.

## SIGNIFICANT INDUSTRIAL USERS

PERMITTEE	AVG FLOW (MGD)	DAILY AVG ANTIMONY (MG/L)	DAILY AVG ARSENIC (MG/L)	DAILY AVG CADMIUM (MG/L)	DAILY AVG CHROMIUM (MG/L)	DAILY AVG HEX CHROM (MG/L)	DAILY AVG COPPER (MG/L)	DAILY AVG CYANIDE (MG/L)	DAILY AVG LEAD (MG/L)	DAILY AVG MERCURY (MG/L)	DAILY AVG Molybdenum (mg/l)	DAILY AVG NICKEL (MG/L)	DAILY AVG SELENIUM (MG/L)	DAILY AVG SILVER (MG/L)	DAILY AVG ZINC (MG/L)
Amerex (IU363700055)	0.0150	0.0000	0.0000	0.0090	1.7100	0.0000	2.0700	0.0400	0.0500	0.0000	0.0000	2.3800	0.0000	0.2400	1.4800
CRB (IU363700910)	0.0003	0.0000	0.0000	0.0000	0.0700	0.0000	0.0000	0.0000	0.0003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total Industrial flow</b>	<b>0.0153</b>														

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 (MGD)	DAILY AVG ANTIMONY (LBS/D)	DAILY AVG ARSENIC (LBS/D)	DAILY AVG CADMIUM (LBS/D)	DAILY AVG CHROMIUM (LBS/D)	DAILY AVG HEX CHROM (LBS/D)	DAILY AVG COPPER (LBS/D)	DAILY AVG CYANIDE (LBS/D)	DAILY AVG LEAD (LBS/D)	DAILY AVG MERCURY (LBS/D)	DAILY AVG Molybdenum (LBS/D)	DAILY AVG NICKEL (LBS/D)	DAILY AVG SELENIUM (LBS/D)	DAILY AVG SILVER (LBS/D)	DAILY AVG ZINC (LBS/D)
Amerex (IU363700055)	0.015	0.0000	0.0000	0.0011	0.2139	0.0000	0.2590	0.0050	0.0063	0.0000	0.0000	0.2977	0.0000	0.0300	0.1851
CRB (IU363700910)	0.0003	0.0000	0.0000	0.0000	0.0002	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0153	0.0000	0.0000	0.0011	0.2141	0.0000	0.2590	0.0050	0.0063	0.0000	0.0000	0.2977	0.0000	0.0300	0.1851

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

PARAMETER	
ANTIMONY	0.0000
ARSENIC	0.0000
CADMIUM	0.0011
CHROMIUM	0.2141
HEX CHROM	0.0000
COPPER	0.2590
CYANIDE	0.0050
LEAD	0.0063
MERCURY	0.0000
Molybdenum	0.0000
NICKEL	0.2977
SELENIUM	0.0000
SILVER	0.0300
ZINC	0.1851