



MAR 09 2020

Alabama Department of Environmental Management  
adem.alabama.gov

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MR DOUG COTE  
WATER AND SEWER ASSISTANT DIRECTOR  
MOBILE AREA WATER AND SEWER SYSTEM  
4725 MOFFETT ROAD SUITE H  
MOBILE AL 36652

Re: REVISED DRAFT LOCAL LIMITS  
MOBILE AREA WATER AND SEWER SYSTEM  
MOBILE WRIGHT SMITH WWTP  
NPDES PERMIT NO. AL0023094

Dear Mr. Cote:

This letter is to provide notification that ADEM has revised the draft local limits document for the Wright Smith WWTP based on updated information. 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 14 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 Brian Marshall by email at [BMarshall@adem.alabama.gov](mailto:BMarshall@adem.alabama.gov) or by phone at (334) 271-7895.

Sincerely,

A handwritten signature in black ink, appearing to be "S Ramsey", written over the word "Sincerely".

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

Attachments: Draft Local Limits  
Rationale for Local Limits  
Local Limits/Pass Through Calculations  
List of Significant Industrial Users

CC: Coastal Laundry  
Kemira Chemicals Inc  
Mobile Paperboard Corp  
Stephanie Ammons  
Brian Marshall.



# LOCAL LIMITS

**PUBLICLY OWNED TREATMENT WORKS:** MOBILE WRIGHT SMITH WWTP

**LOCATION:** MOBILE, ALABAMA  
MOBILE COUNTY

**PERMIT NUMBER:** AL0023094

## 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, Trivalent	0.2475
Cadmium, Total Recoverable	0.6158
Chromium, Total Recoverable	26.69
Copper, Total Recoverable	5.125
Cyanide, Free	1.415
Lead, Total Recoverable	4.304
Mercury, Total Recoverable	0.0281
Nickel, Total Recoverable	3.751
Silver, Total Recoverable	6.785
Zinc, Total Recoverable	55.50

**HYDRAULIC LOADING:**

The hydraulic loading on an average basis is the design capacity of the treatment plant which is 12.8 million gallons per day.

**ORGANIC LOADING:**

The organic loading (CBOD<sub>5</sub>) is the design capacity of the treatment plant which is 17,828 pounds per day.

**SOLIDS LOADING**

The Total Suspended Solids loading (TSS) is the design capacity of the treatment plant which is 21,350 pounds per day.

**EFFECTIVE DATE:**

**ISSUANCE DATE:**

**DRAFT**

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**Alabama Department of Environmental Management**

## Rationale for Local Limits

Mobile Wright Smith WWTP (AL0023094)  
12.8 MGD Trickling filter with nitrification  
Mobile/Mobile County

Reissuance  
Prepared Date: 2/13/2019  
Prepared By: Ed Hughes  
Revised Date: 2/21/2020, 3/4/2020

### Nonconventional Pollutants:

#### Pass Through:

Allowable pollutant loadings were based on state water quality standards applicable to streams with a use designation of Limited Warmwater Fishery. Local limits calculations were performed using the receiving stream 7Q2, 1Q10 and annual average flow; however, due to the tidal influence in the receiving stream it was determined to be unreasonable to utilize conventional methods for calculating these critical flows. In this case, the 1Q10 was assumed to be 81.6 percent of the flow based on the effluent dilution calculated by the CORMIX model used to develop acute toxicity limits for this site. Specifically the CORMIX model determined that plant effluent represented 18.4 percent of the flow at the edge of the mixing zone. Therefore the stream flow would be 81.6 percent of the total flow or 4.43 times the effluent flow of 12.8 million gallons per day. This equates to 56.76 MGD or 87.9 cfs. Using the accepted ratio of 1:1.33, the 7Q10 was calculated to be 116.9 cfs. For lack of any acceptable method to calculate the 7Q2 and annual average flow, a very conservative approach was taken which assumed these flows to be equivalent to the 7Q10. A stream hardness of 171.2 mg/l as CaCO<sub>3</sub> based on data from the upstream ADEM trend station was used in the local limits calculations. 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. 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 using land application. According to the POTW's most recent MWSS annual report, 573.05 tons of sludge are generated and disposed annually based on an average wastewater flow of 9.63 MGD. This equates to daily disposal rate of 2.092 tons of sludge based on the design

wastewater flow of 12.8 MGD. This value was used in the development of local limits for this site. 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.

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, 12.8 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 (2/21/2020):**

In this revision, the average hardness measured at the ADEM trend station located upstream of the municipal outfall was used in lieu of the default value of 50 mg/l as CaCO<sub>3</sub>. This change did not affect the list of over allocated pollutants but did increase the available allocation for Silver. The revised spreadsheet indicates that Copper and Cyanide are the pollutants currently over allocated.

Also, the mass of Copper discharged from Mobile Paperboard was corrected in the SIU table of the local limits spreadsheet. The company had incorrectly reported two values as mg/l instead of ug/l. This reduced the Copper loading from this source to 0.015 ppd.

**Revision (3/4/2020):**

The most recent local limit spreadsheet was used to calculate headworks loading allocations for the Wright Smith WWTP. In addition, corrections were made to the stream flows used to calculate local limits. The first paragraph of this rationale has been revised to discuss the specific changes made. In addition, the water system has provided site-specific data related to influent and effluent concentrations of the pollutants of concern and the concentration of pollutants from a location expected to contain a representative sample of domestic and commercial wastewaters. The spreadsheet utilized this data to determine background pollutant levels and removal rates for pollutants at the POTW. (Note: The removal rate for Cyanide was based on the default value instead of the value calculated from site-specific data. This is because the measured values were consistently less than detection levels such that the percent removal calculation did not provide realistic results).

The result of these changes shows that no pollutant is currently over allocated.

**LOCAL LIMIT/ PASS THROUGH CALCULATIONS**

POTW NAME: Mobile Wright Smith WWTP  
 NPDES PERMIT NUMBER: AL0023094

DATE PREPARED: 2/27/2020  
 PREPARED BY: Ed Hughes  
 REVISED DATE: 3/2/2020

STREAM DATA AND POTW FLOW DATA					
RECEIVING STREAM CLASSIFICATION	=	LWF	3	RECEIVING STREAM TIDALLY INFLUENCED =	Yes
POTW DESIGN FLOW	=		12.8 MGD		
FLOW FROM OTHER CONTRIBUTORS	=		MGD		
DOMESTIC FLOW	=		12.1272 MGD		
7Q10	=		116.9 CFS	OR	75.52 MGD
1Q10	=		87.90 CFS	OR	56.78 MGD
7Q2	=		116.9 CFS	OR	75.52 MGD
ANNUAL AVG FLOW	=		116.9 CFS	OR	75.52 MGD
STREAM HARDNESS (DEFAULT VALUE 100)	=		171.2 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) WO / HH	PARAMETER
	TOXICITY	TOXICITY	INSTREAM	TOXICITY	TOXICITY	INSTREAM	HEALTH	INSTREAM	BASED DISC	
	(MG/L)	(MG/L)	(LBS/D)	(MG/L)	(MG/l)	(LBS/D)	(MG/L)	(LBS/D)	LEVEL (LBS/D)	
ANTIMONY, TOTAL RECOVERABLE	----	----	----	----	----	----	0.3733333	274.985	274.985	ANTIMONY, TR
ARSENIC, TRIVALENT	0.1500	0.0360	26.516	0.3400	0.0690	40.042	0.00030	0.223	0.223	ARSENIC, TRI
CADMIUM, TOT RECOVERABLE	0.00036	0.0088	1.115	0.0034	0.0400	8.350	----	----	1.115	CADMIUM, TR
CHROMIUM, TOT RECOVERABLE	0.1151	----	403.77174	0.8850	----	2445.607	----	----	403.772	CHROMIUM, TR
CHROMIUM, HEXVALENT	0.0110	0.0500	14.115	0.0160	1.1000	9.285	----	----	9.285	CHROMIUM, HEX
COPPER, TOTAL RECOVERABLE	0.0142	0.0031	2.283	0.0223	0.0048	2.786	----	----	2.283	COPPER, TR
CYANIDE, FREE	0.0052	0.0010	0.737	0.0220	0.0010	0.580	9.3333	6874.63	0.580	CYANIDE, FREE
LEAD, TOT RECOVERABLE	0.0045	0.0081	5.966	0.1154	0.2100	121.868	----	----	5.966	LEAD, TR
MERCURY, TOT RECOVERABLE	0.000012	0.000025	0.01841	0.0024	0.0021	1.219	0.0000424	0.031	0.01841	MERCURY, TR
MOLYBDENUM	----	----	----	----	----	----	----	----	----	MOLYBDENUM
NICKEL, TOT RECOVERABLE	0.0820	0.0082	6.040	0.7379	0.0740	42.944	0.9929078	731.343	6.040	NICKEL, TR
SELENIUM, TOTAL RECOVERABLE	0.0005	0.0071	0.368	0.0020	0.0290	1.161	2.4305556	1790.267	0.368	SELENIUM, TR
SILVER, TOT RECOVERABLE	----	----	----	0.0081	0.0019	1.103	----	----	1.103	SILVER, TR
ZINC, TOT RECOVERABLE	0.1863	0.0810	59.662	0.1848	0.0900	52.229	14.8936170	10970.15	52.229	ZINC, TR

		Antimony	Arsenic	Cadmium	Chromium, Tot	Chromium, VI	Copper	Cyanide	Lead	Mercury	Molybdenum	Nickel	
DOMESTIC	DATA VALUE	0.0005	0.0008	0.0001	0.0011	0.0000	0.0275	0.0025	0.0015	0.0002	0.0007	0.0023	
	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	0.0003	0.0993									
	LIT VALUE	0.0000	0.0100	0.1800									

TYPE OF TREATMENT =	3	Trickling filter	SLUDGE DISPOSAL	
TREATMENT INCLUDE NITIFICATION?	Yes		DOES THE POTW HAVE SECONDARY CLARIFICATION?	Yes
			AVERAGE TONS OF SLUDGE PER DAY (DRY WEIGHT)	2.092
			IS SLUDGE LAND APPLIED?	Yes
GROWTH ALLOCATION				
			% 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) AVAILÁBLE CAPACITY FOR GROWTH (LBS/D)	LIMITING FACTOR
ANTIMONY, TOT RECOVERABLE	274.9851	0	274.9851	22	351.4653				274.9851	0.0501	0.0000	247.4415	WATER QUALITY
ARSENIC, TRIVALENT	0.2232	0	0.2232	10	0.2475	0.100	10.6752	3.194035714	0.2475	0.0832	0.0000	0.1479	WATER QUALITY
CADMIUM, TOT RECOVERABLE	1.1152	0	1.1152	58	2.6395	1.000	106.7520	0.615834313	0.6158	0.0104	0.0014	0.5436	SLUDGE
CHROMIUM, TOT RECOVERABLE	403.7717	0	403.7717	50	800.2562	0.250	26.6880	-----	26.6880	0.1084	0.0037	23.9183	INHIBITION
CHROMIUM, HEXAVALENT	9.2852	0	9.2852	55	20.6338	1.000	106.7520	-----	20.6338	0.0000	0.0000	18.5704	WATER QUALITY
COPPER, TOTAL RECOVERABLE	2.2834	0	2.2834	55	5.1245	0.050	5.3376	32.45050449	5.1245	2.7856	0.1499	1.9701	WATER QUALITY
CYANIDE, FREE	0.5803	0	0.5803	59	1.4154	0.100	10.6752	-----	1.4154	0.2529	0.0508	1.0006	WATER QUALITY
LEAD, TOT RECOVERABLE	5.9662	0	5.9662	82	32.5300	0.500	53.3760	4.303926417	4.3039	0.1487	0.6348	3.1684	SLUDGE
MERCURY, TOT RECOVERABLE	0.0184	0	0.0184	35	0.0281	0.100	10.6752	0.691269565	0.0281	0.0214	0.0000	0.0060	WATER QUALITY
MOLYBDENUM		0						0.3138	0.3138	0.0695	0.0000	-----	SLUDGE
NICKEL, TOT RECOVERABLE	6.0399	0	6.0399	47	11.3641	0.250	26.6880	3.750753548	3.7508	0.2276	0.0025	3.1686	SLUDGE
SELENIUM	0.3683	0	0.3683	50	0.7366			0.8368	0.7366	0.0000	0.0000	0.6529	WATER QUALITY
SILVER, TOT RECOVERABLE	1.1025	0	1.1025	84	6.7853	0.250	26.6880	-----	6.7853	0.0344	0.0206	6.0573	WATER QUALITY
ZINC, TOT RECOVERABLE	52.2293	0	52.2293	57	120.1877	1.000	106.7520	55.4970527	55.4971	10.0466	2.2075	38.9187	SLUDGE



## 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 on 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)
Coastal Laundry (IU414900807)	0.0333	0.0000	0.0000	0.0050	0.0133	0.0000	0.1826	0.0179	0.0070	0.0000	0.0000	0.0090	0.0000	0.0670	0.4917
Kemira Chemicals (IU414900736)	0.1395	0.0000	0.0000	0.0000	0.0000	0.0000	0.0315	<b>0.0000</b>	<b>0.5440</b>	0.0000	0.0000	0.0000	0.0000	0.0017	<b>1.7800</b>
Mobile paperboard (IU414900078)	0.5000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0150	0.0110	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total Industrial flow	0.6728														

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)
Coastal Laundry (IU414900807)	0.0333	0.0000	0.0000	0.0014	0.0037	0.0000	0.0507	0.0050	0.0019	0.0000	0.0000	0.0025	0.0000	0.0186	0.1366
Kemira Chemicals (IU414900736)	0.1395	0.0000	0.0000	0.0000	0.0000	0.0000	0.0366	0.0000	0.6329	0.0000	0.0000	0.0000	0.0000	0.0020	2.0709
Mobile paperboard (IU414900078)	0.5	0.0000	0.0000	0.0000	0.0000	0.0000	0.0626	0.0459	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.6728	0.0000	0.0000	0.0014	0.0037	0.0000	0.1499	0.0508	0.6348	0.0000	0.0000	0.0025	0.0000	0.0206	2.2075

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

PARAMETER	
ANTIMONY	0.0000
ARSENIC	0.0000
CADMIUM	0.0014
CHROMIUM	0.0037
HEX CHROM	0.0000
COPPER	0.1499
CYANIDE	0.0508
LEAD	0.6348
MERCURY	0.0000
Molybdenum	0.0000
NICKEL	0.0025
SELENIUM	0.0000
SILVER	0.0206
ZINC	2.2075