

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
1 CONGRESS STREET - SUITE 1100
BOSTON, MASSACHUSETTS 02114

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES.

NPDES PERMIT NO.: **MA0101788**

NAME AND ADDRESS OF APPLICANT:

**Town of Hudson
Department of Public Works
1 Municipal Drive
Hudson, Massachusetts 01749**

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

**Hudson Wastewater Treatment Facility
1 Municipal Drive
Hudson, Massachusetts 01749**

RECEIVING WATER: **Assabet River** (Concord Basin)
USGS Hydrologic code: 01070005

CLASSIFICATION: **Class B**

I. Proposed Action, Type of Facility and Discharge Location

The above named applicant has applied to the U.S. Environmental Protection Agency ("EPA") for the reissuance of its NPDES permit to discharge into the designated receiving water. The facility is engaged in the collection and treatment of domestic and industrial wastewater and septage. The discharge from this advanced secondary wastewater treatment facility is via Outfall 001 to the Assabet River.

II. Description of Discharge

A quantitative description of the wastewater treatment plant discharge in terms of significant effluent parameters based on recent monitoring data is shown on Table 1.

III. Permit Limitations and Conditions.

The effluent limitations and the monitoring requirements may be found in the draft NPDES permit.

IV. Permit Basis and Explanation of Effluent Limitation Derivation

The Town of Hudson's Wastewater Treatment Facility (facility) is a 3.0 million gallon per day (MGD) advanced secondary wastewater treatment facility located in Hudson, Massachusetts, serving a population of about 19,000. The facility also accepts septage from the Towns of Hudson and Stow and a small amount of leachate from the Hudson landfill. There are currently 10 industrial users contributing wastewater to this facility.

This facility employs an advanced trickling filter design as well as activated sludge for wastewater treatment. Ferric chloride is used for phosphorus removal. Chlorination and dechlorination are both manually paced. See Figure 2 for a schematic of the wastewater treatment facility.

Under Section 301(b)(1)(C) of the Clean Water Act (CWA), discharges are subject to effluent limitations based on water quality standards. The limitations in this permit are established to assure that the water quality uses of the receiving water as designated in the Massachusetts Surface Water Quality Standards (MASWQS) [314 CMR 4.00] are protected and maintained or attained.

According to 40 CFR 122.44(l), when a permit is reissued, effluent limitations, standards or conditions must be at least as stringent as the final effluent limitations, standards or conditions in the previous permit unless the circumstances on which the previous permit was based have materially and substantially changed since the time the permit was issued.

Waterbody Classification and Usage

The Assabet River at the point of discharge is classified in 314 CMR 4.00 as a Class B water body by the Massachusetts Department of Environmental Protection (MA DEP). Class B waters are designated as a habitat for fish, other aquatic life and wildlife and for primary and secondary contact recreation. These waters shall have consistently good aesthetic value. Where designated, they shall be suitable as a source of public water supply with appropriate treatment. They shall be suitable for irrigation and other agricultural uses and for compatible industrial cooling and process uses.

Conventional Pollutants

Under Section 301(b)(1)(B) of the CWA, POTWs must have achieved effluent limitations based upon **secondary treatment** by July 1, 1977. The secondary treatment requirements are set forth at 40 CFR Part 133. EPA is required to consider both minimum technology-based controls and water quality requirements when developing effluent limitations. EPA regulations require NPDES permits to contain effluent limits more stringent than technology-based limits where more stringent limits are necessary to maintain or achieve federal or state water quality standards in accordance with Section 301(b)(1)(C) of the Clean Water Act (“CWA”).

Effluent limitations for April through October for Biochemical Oxygen Demand (BOD₅) and Total Suspended Solids (TSS) are water quality based limits and are the same as in previous permits. See **Attachment A** for a mass limit calculation for TSS. Effluent limitations for November through March for BOD₅ and TSS are based on secondary treatment requirements. Effluent limitations for pH and fecal coliform are based on water quality standards and State Certification requirements for Publicly Owned Treatment Works (POTW) under Section 401(d) of the CWA, 40 CFR 124.53 and 124.55.

There have been three violations for BOD and eleven violations for TSS during the period 5/01 through 12/03. The BOD and TSS removal percentages have averaged 96% and 93% respectively with two violations of the 85% minimum BOD removal requirement.

The permittee discharged flow in the range of 1.64 to 2.92 MGD to the Assabet River during the period of 5/01 through 12/03. The flow limit of 3.0 MGD has been maintained in the permit, expressed as an annual average. There were no exceedances of this flow limit during this two year period. The highest maximum daily discharge flow during this period of 3.82 MGD indicates that the facility is subject to significant quantities of infiltration and inflow (I/I) into the sewer system. The permit includes new language for the control of I/I. The permittee is responsible for ensuring that the I/I control program is sufficient to ensure that high flows do not cause an exceedance of the discharge limits and that there are no unauthorized discharges from the separate sewer system.

7Q10 flow

To calculate certain permit limits the 7Q10 flow, which represents the 7 day low flow over a 10 year period, is required. For the previous permit, a 7Q10 flow analysis was completed based on the most recent 30 year record of the Maynard USGS flow gage. A graphical analysis of these data indicated a 7Q10 of approximately 14 cfs at the Maynard gage. In order to estimate the upstream wastewater flows contributing to the 7Q10 flow at the Maynard gage, and to use them in estimating the 7Q10 flow at the point of discharge, flow data from the three upstream POTW facilities for the low flow period of July through September were used for the previous 10 years. The average discharge flow for this permittee during this period was 3.0 cfs. The Maynard gage has a drainage area of 109 square miles excluding the headwaters impoundment which has no outflow during low flow conditions. The base flow was calculated as 0.024 cfs per square mile. At Hudson, the upstream base flow based on a drainage area of 67 square miles is 1.6 cfs and the upstream wastewater flow

is 8.4 cfs. This yielded an estimated 7Q10 flow of 10 cfs. This will be maintained as the 7Q10 flow and the limits which are determined by this flow are discussed below.

Phosphorus

It has been documented that most reaches of the Assabet River suffer from eutrophication, a condition caused primarily by excessive nutrients entering the river. Phosphorus and other nutrients promote the growth of nuisance algae and aquatic plants. When these plants and algae undergo their decay processes, they generate strong odors, result in lower dissolved oxygen levels in the river, and impair the benthic habitat. This phosphorus-driven eutrophication of the Assabet River prevents attainment of the designated uses as defined in the MASWQS. These uses include habitat for fish, other aquatic life, and wildlife, and for primary and secondary contact recreation.

There are several applicable water quality criteria which are not being met in the Assabet River due to phosphorus discharges and resulting eutrophication. They include numeric water quality criteria (e.g., dissolved oxygen), and narrative water quality criteria including aesthetics (314 C.M.R. § 4.05(5)(a)), bottom pollutants and alterations (314 C.M.R. § 4.05(5)(b)), and nutrients 314 C.M.R. § 4.05(5)(c).¹

Although some phosphorus is introduced into the river from storm water runoff, the majority of phosphorus entering the river is from the four main POTWs discharging to the Assabet. These are the Westborough/ Shrewsbury, Marlboro Westerly, Hudson, and Maynard facilities. Another factor that compounds the eutrophication situation is the relatively high level of treated sanitary wastewater discharged to the Assabet from these four facilities during the low flow periods of summer and early fall. There are times when the Assabet River is composed almost entirely of wastewater effluent. In addition, the numerous impoundments on the Assabet River exacerbate the eutrophication effects of the phosphorus enrichment and create a sink for phosphorus that accumulates in the sediments. A significant amount of this phosphorus in the sediments recycles into the water column during the critical growing period.

The DEP has developed a Total Maximum Daily Load (TMDL) analysis for phosphorus in the Assabet River. The TMDL is based on a water quality model that was used to evaluate the maximum amount of a pollutant that may be introduced into a waterbody so that water quality standards will

¹ An additional requirement related to cultural eutrophication exists at 314 C.M.R. § 4.04(5), as part of the state's antidegradation provisions. This section requires any existing point source discharge containing nutrients in a concentration that encourages eutrophication to apply the "highest and best practical treatment." In the case of the Assabet River, EPA and DEP have concluded that the technology-based requirement of "highest and best practical treatment," which the state had determined to be "0.2 mg/l" in the previously issued permit, will not be sufficient to address the water quality standards violations discussed above, and that a water quality based effluent limit is necessary to meet water quality standards.

be met and maintained over the long term. The TMDL identifies a combination of point source phosphorus reduction and sediment remediation as the preferred scenario for achieving the phosphorus reduction necessary to achieve standards. The preferred scenario includes a reduction in point source discharges of total phosphorus to 0.1 mg/l in combination with a 90% reduction in the phosphorus loading from the sediments in the impoundments.

The seasonal total phosphorus limit of 0.1 mg/l is in effect from April through October. This limit is defined as a 60 day rolling average limit. The 60 day average value for each day in a given month, beginning on the 60th day after April 1, must be calculated and the highest 60 day average value for that month must be reported on the monthly discharge monitoring report (DMR). In addition, the maximum daily value must be reported for each month. The permit also requires that the permittee at all times operate and maintain the facility so as to minimize effluent phosphorous loadings.

In addition to the seasonal total phosphorus limit of 0.1 mg/l, the permit contains a winter period total phosphorus limit of 1.0 mg/l during November through March. The winter period limitation on total phosphorus is necessary to ensure that the higher levels of phosphorus discharged in the winter period do not result in the accumulation of phosphorus in the sediments. The limitation assumes that the vast majority of the phosphorus discharged will be in the dissolved fraction and that dissolved phosphorus will pass through the system given the short detention time of the impoundments and the lack of plant growth during the winter period. If future evaluations indicate that phosphorus may be accumulating in the impoundments, the winter period phosphorus limit may be reduced in future permit actions. The agencies will pursue the necessary resources in order to conduct the evaluation. If necessary, the permittee may be asked to conduct the analysis through the authority of Section 308 of the Clean Water Act.

The permit contains a compliance schedule for meeting the total phosphorus limits (see Section I.F. of the permit.) The schedule contains several interim milestones and reporting requirements relative to the steps necessary to complete the design and construction of facilities necessary to meet the final limits. By June 30, 2008, the Permittee must complete construction and initiate operation of the facility improvements. Final compliance with the total phosphorus limits must be achieved by April 1, 2009. The permit establishes an April through October seasonal interim total phosphorus limit of 0.75 mg/l that is in effect until the final compliance date noted above. The permit also establishes a November through March interim total phosphorus requirement to optimize phosphorus removal with a goal of achieving a discharge total phosphorus concentration of 1.0 mg/l or less.

Ammonia Nitrogen

The previous permit included seasonal limits for ammonia nitrogen which were based on dissolved oxygen modeling completed by MADEP in 1986. These limits, 3.0 mg/l for a monthly and weekly average and 5.0 mg/l for a daily maximum, are maintained in the permit for the period of June through October. There were four violations of the ammonia nitrogen limits between 5/01 and 12/03.

A discharge limit for the period of November through May has been established to ensure that the ambient water quality criteria for ammonia toxicity is not exceeded. The applicable ambient chronic criteria for November through March is 7.9 mg/l based on a receiving water pH of 7.0, a receiving water temperature of 10 degrees Celsius and the absence of early life stages of the most sensitive species used to derive the criteria (see EPA 1999 Update of Ambient Water Quality Criteria for Ammonia). The applicable ambient criteria for April through May is 5.9 mg/l based on the same receiving water pH and temperature, and the presence of early life stages. A review of November through May flow data from the Maynard gage indicates that the lowest flow in recent years occurred in November of 2001 when the monthly average flow was 35.4 cfs. This is a factor of 2.5 times the annual 7Q10 value, indicating minimal base flow dilution at the point of discharge. The majority of the available dilution consists of effluent from the upstream dischargers which have ammonia limits of 10.0 mg/l and 8.0 mg/l during this time period. A monthly average limit of 10.0 mg/l has been established for November through May to ensure that the ambient chronic criteria are met. The lower ambient criteria for April and May based on the presence of early life stages are expected to be met as a result of the significantly higher historical flows measured at the Maynard gage for April and May as compared to the November through March time period.

pH

The permit requires the effluent pH to be maintained in the range of 6.5 s.u. to 8.3 s.u. consistent with MASWQS. This represents a change from the current permitted range of 6.0 s.u. to 8.3 s.u. reflecting the lack of dilution in the receiving water. The permittee has had several violations of the current permitted range, all on the lower end of the range.

Bacteria Limitations

The Fecal Coliform limits are a geometric mean of no more than 200 colony forming units (cfu) per 100 ml and a daily maximum of 400 cfu per 100 ml. These limits are consistent with Class B water requirements of the MASWQS. There has been one violation in the reporting period above.

Total Residual Chlorine (TRC)

Chlorine and chlorine compounds produced by the chlorination of wastewater can be extremely toxic to aquatic life. Effluent limits are based on water quality criteria for TRC which are specified in the water quality criteria document, often referred to as the EPA Goldbook. The criteria states that the average TRC in the receiving water should not exceed 11 ug/l for protection from chronic toxicity

and the maximum TRC should not exceed 19 ug/l for protection from acute toxicity. Effluent TRC limits have generally been less than the detection level of 50 ug/l. There was one violation during the period of 5/01 through 12/03. A new detection level of 20 ug/l has been established in this permit.

The 7Q10 dilution and plant design flow are necessary to calculate the appropriate TRC limits. The 7Q10 dilution multiplied by the chronic and acute fresh water criteria provide the appropriate TRC limits. As shown in **Attachment B**, the calculated limits are 35 ug/l and 61 ug/l and these are the proposed draft permit limits.

The permit also includes a requirement that the chlorination and dechlorination systems include alarms for indicating system interruptions or malfunctions and that interruptions or malfunctions be reported with the monthly compliance reports. This requirement is intended to supplement the grab sampling requirements for chlorine and bacteria and is a recognition of the limitations of a grab sampling program for determining consistent compliance with permit limits.

Metals

The MASWQS include requirements for the regulation and control of toxic constituents and also require that EPA criteria established pursuant to Section 304(a) of the CWA shall be used unless site specific criteria are established.

Calculations in Attachment C show the chronic and acute limits for copper. The permit limits for copper are 17.0 ug/l and 23.0 ug/l for monthly average and daily maximum, respectively.

A monthly average limit for aluminum of 278 ug/l has been included in the draft permit. Effluent data for aluminum over the last two years has been as high as 575 ug/l and the ambient chronic criteria for aluminum is 87 ug/l.

Effluent data for lead, and zinc indicate that there is not a reasonable potential to exceed criteria.

Whole Effluent Toxicity

National studies conducted by the U.S. Environmental Protection Agency have demonstrated that domestic sources contribute toxic constituents to POTWs. These constituents include metals, chlorinated solvents and aromatic hydrocarbons among others. The Region's current policy is to include toxicity testing requirements in all municipal permits, while Section 101(a)(3) of the CWA specifically prohibits the discharge of toxic pollutants in toxic amounts.

Based on the potential for toxicity resulting from domestic and industrial contributions, and in accordance with EPA regulation and policy, the draft permit includes acute and chronic toxicity limitations and monitoring requirements. (See, e.g., "Policy for the Development of Water Quality-Based Permit Limitations for Toxic Pollutants", 50 Fed. Reg. 30,784 (July 24, 1985); see also, EPA's Technical Support Document for Water Quality-Based Toxics Control, March 1991). EPA Region I has developed a toxicity control policy. The policy requires wastewater treatment facilities to perform toxicity bioassays on their effluents. Pursuant to EPA Region 1 policy, discharges

having a dilution of less than 10:1 require acute and chronic toxicity testing four times per year. The principal advantages of biological techniques are: (1) the effects of complex discharges of many known and unknown constituents can be measured only by biological analyses; (2) bio-availability of pollutants after discharge is best measured by toxicity testing including any synergistic effects of pollutants; and (3) pollutants for which there are inadequate chemical analytical methods or criteria can be addressed. Therefore, toxicity testing is being used in conjunction with pollutant specific control procedures to control the discharge of toxic pollutants.

The draft permit requires that the Hudson conduct WET testing for the Outfall 001 effluent four times per year using the daphnid, Ceriodaphnia dubia. Based upon the Assabet River water historically failing as a control for species survival for the minnow, the Region previously determined that the permittee may use an alternate dilution water year round. The permittee must continue to use an alternate dilution water that has characteristics such as hardness, pH, conductivity, alkalinity, organic carbon, and total suspended solids similar to those of the receiving water and does not illicit a toxic response. Alternate dilution water tests must be run with a minimum of two controls: a receiving water control and an alternate dilution water control. Chemical data of the receiving water and dilution water samples must be included in the WET report. EPA Region I WET protocol found in permit **Attachment A** shall be followed.

C-NOEC is the highest effluent concentration at which No Observed Chronic Effect (e.g. growth, reproduction, mortality) will occur at continuous exposure to test organisms in a life-cycle or partial life-cycle test. The "31% or greater" limit is defined as a sample which is composed of 31% (or greater) effluent, the remainder being dilution water. This is a maximum daily limit based on the dilution factor of 3.2.

V. Sewage Sludge Information and Requirements

The Hudson WTP currently transports its sludge to the Marlborough West facility. The permit prohibits any discharge of sludge. Section 405(d) of the Clean Water Act (CWA) requires that sludge conditions be included in all POTW permits. Technical sludge standards required by Section 405 of the CWA were finalized on November 25, 1992 and published on February 19, 1993. The regulations went into effect on March 21, 1993.

VI. Essential Fish Habitat Determination (EFH):

Under the 1996 Amendments (PL 104-267) to the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801 et seq. (1998)), EPA is required to consult with the National Marine Fisheries Services (NMFS) if EPA's action or proposed actions that it funds, permits, or undertakes, may adversely impact any essential fish habitat as: waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity (16 U.S.C. § 1802 (10)). Adversely impact means any impact which reduces the quality and/or quantity of EFH (50 C.F.R. § 600.910 (a)). Adverse effects may include direct (e.g., contamination or physical disruption), indirect (e.g., loss of prey, reduction in species' fecundity), site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions.

Essential fish habitat is only designated for species for which federal fisheries management plans exist (16 U.S.C. § 1855(b) (1) (A)). EFH designations for New England were approved by the U.S. Department of Commerce on March 3, 1999.

EPA has determined that a formal EFH consultation with NMFS is not required because the proposed discharge will not adversely impact EFH.

VII. State Certification Requirements

EPA may not issue a permit unless the Massachusetts Department of Environmental Protection certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate State Water Quality Standards. The staff of the Massachusetts Department of Environmental Protection has reviewed the draft permit and advised EPA that the permit is adequate to protect water quality. EPA has requested permit certification by the State pursuant to 40 CFR 124.53 and expects that the draft permit will be certified.

VIII. Public Comment Period and Procedures for Final Decision

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to the U.S. EPA, Office of Ecosystem Protection (SPA), 1 Congress Street, Suite 1100, Boston, Massachusetts 02114-2023. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and the State Agency. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty days public notice whenever the Regional Administrator finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice.

IX. EPA and MADEP Contacts

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays, from the EPA and DEP contacts below:

David Pincumbe, USEPA Office of Ecosystem Protection
One Congress Street, Suite 1100 - Mailcode CPE
Boston, MA 02114-2023
Telephone: (617) 918-1695 FAX: (617) 918-1505

Paul Hogan, Massachusetts Department of Environmental Protection
Division of Watershed Management, Surface Water Discharge Permit Program
627 Main Street, 2nd Floor Worcester, Massachusetts 01608
Telephone: (508) 767-2796 FAX: (508) 791-4131

Date

Linda M. Murphy, Director
Office of Ecosystem Protection
U.S. Environmental Protection Agency

TABLE 1 – OUTFALL 001 CHARACTERISTICS

<u>Parameter</u>	<u>Monthly Average</u>	<u>High Daily Maximums</u>	<u>Number of Violations²</u>
Flow, MGD	Range: 1.64 - 2.92	3.80, 3.82	2

BOD ₅ , mg/l (Apr-Oct)	4.3	67, 33	3
BOD ₅ , mg/l (Nov - March)	13	43, 36	0
TSS, mg/l (Apr-Oct)	12	77, 58	11
TSS, mg/l (Nov - March)	19	48, 35	0
Total Copper, ug/l	40	220, 57	2
pH, S.U. Range: 5.4 - 10.9			10
Fecal Coliform, cfu/100 ml	51	TNTC ³ , 380	1
Phosphorus, mg/l (April - Oct) Range: 0.15 - 1.09		2.3, 1.3	2
Ammonia-nitrogen, mg/l (Nov - April)	6.3	24, 21	---
(May - Oct)	0.7	23, 3.5	4
D.O., mg/l Range: 4.8 - 8.0			1
Chlorine Residual, ug/l	Most ND ⁴	70, 50	1
BOD Removal, %	96	83, 83 ⁵	2
TSS Removal, %	93	85.5, 86.5 ⁵	0
LC50, daphnid, %	92	62, 71 ⁵	3
NOEL, daphnid,%	69	12.5, 25 ⁵	2

1. Data is from Discharge Monitoring Reports for the period of May 2001 to December 2003.
2. These are NPDES effluent limitation violations for the period.
3. TNTC is too numerous to count.
4. ND is not detected.
5. These are the low values for the period.

ATTACHMENT A

CONVENTIONAL POLLUTANT CALCULATION

Receiving Water: Assabet River (Class B)

Plant Design Flow: 3.0 MGD

Parameter: Total Suspended Solids (TSS)

Secondary wastewater treatment requirement:

Monthly average = 30 mg/l

To convert to a mass limit, multiply by the design flow and a conversion factor.

$$30 \text{ mg/l (2.65 MGD) (8.345)} = \text{663 lbs/day}$$

Conversion
factor

Mass limits are calculated using the previous design flow of 2.65 MGD in order to ensure that the increased flow does not result in an increase in the loadings of BOD and TSS. Therefore, the monthly average mass limit for TSS is 663 lbs/day. Likewise, the other TSS and BOD mass limits have been established. These limits will be in effect during the period of April 1st to October 31st.

ATTACHMENT B

WATER QUALITY BASED EFFLUENT LIMIT DERIVATION

Parameter: Chlorine, Total Residual (TRC)

Water Quality Criteria: Fresh water - Chronic, Acute

0.011 mg/l, 0.019 mg/l

Instream 7Q10 flow: 10 cfs = 6.5 MGD

Plant Design Flow: 3.0 MGD

Design Flow Dilution:

$$\frac{\text{Design flow} + 7\text{Q10 flow}}{\text{Design flow}}$$

$$\frac{3.0 + 6.5}{3.0} = 3.2$$

Effluent Limitations:

Monthly Average:

3.2 (0.011 mg/l) =

0.035 mg/l

Daily Maximum:

3.2 (0.019 mg/l) =

0.061 mg/l

These are the water quality based calculations at Hudson's WTF design flow. Therefore, the limits in the permit will be maintained as calculated above.

ATTACHMENT C

METALS LIMITS DERIVATION EXAMPLES

Parameters: Copper

Water Quality Criteria: Hardness dependent; See equation below.

Values calculated are in terms of the total metal.

$$e^{(X [\ln(h)] + Y)}$$

Where:

	<u>Total Copper</u>	
	Chronic	Acute

X=	0.8545	0.9422
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Y=	-1.702	- 1.70
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h = Hardness = 50 mg/l as CaCO₃

ln = natural logarithm

Thus; Copper

$e^{(.8545 [(ln50)] -1.702)}$	$e^{(.9422 [(ln50)] -1.70)}$	=
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5.2 ug/l	7.3 ug/l
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Flow Dilution Factor: 3.2

Water Quality Based Effluent Limitations:

3.2 (5.2) =	3.2 (7.3) =
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17 ug/l	23 ug/l
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