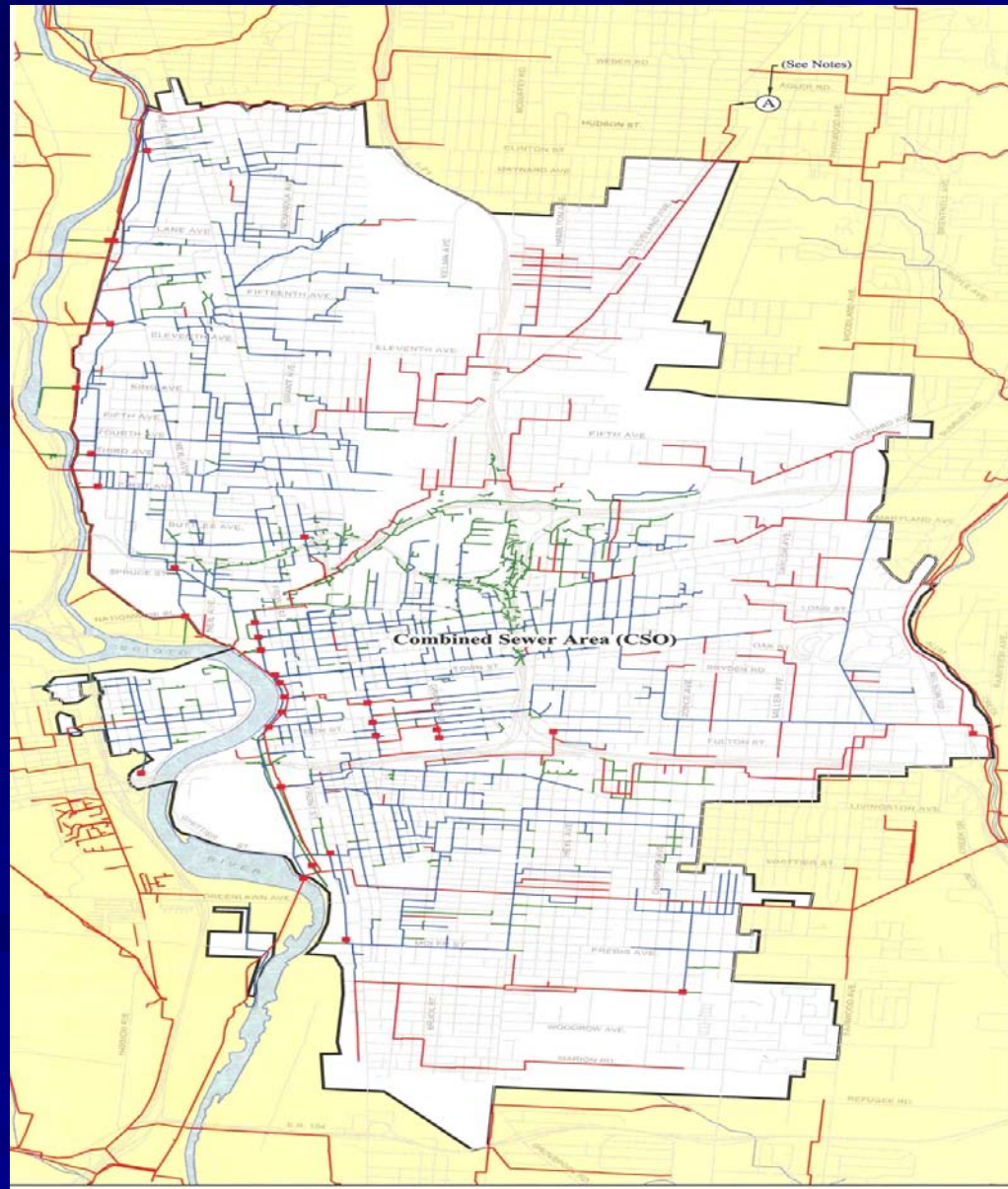


Toxicity Reduction Program for the City of Columbus Jackson Pike Wastewater Treatment Plant: A Success Story

By
Gary Hickman

Sewer/Watershed Tributary to Jackson Pike WWTP



4PF00000*JD

- September 1993 – OEPA issues new NPDES Permit requiring Whole Effluent Toxicity Monitoring beginning December 1993.
- Testing frequency:
 - 1/6 months (semi annual)
- Test organisms:
 - *Ceriodaphnia dubia* (water fleas)
 - *Pimephales promelas* (fathead minnows)

Toxicity Testing Requirements

- Reference: Reporting and Testing Guidance for Biomonitoring Required by Ohio Environmental Protection Agency (1991) and July 1998 –Revision 1
- Requires chronic toxicity testing as specified in section 2.
- Acute toxicity endpoints as described in section 2.H shall be derived from chronic tests.

Toxicity Endpoints

■ Acute

- Mortality 48 hours *Ceriodaphnia dubia*
- Mortality 96 hours *Pimephales promelas*

■ Chronic

- Survival over 7 day test (both species)
- Fish Growth (dry weight after test period)
- Reproduction *Ceriodaphnia dubia* (total # of offspring
 - 3 broods)

*we'll revisit this slide again.

Definition of Terms

- LC 50 = Lethal Concentration in which 50% of the test organisms are dead.
- EC 50 = Effected Concentration in which 50% of the test organisms are either impaired or dead.
- NOEC = No Observable Effect Concentration
- LOEC = Lowest Observable Effect Concentration
- IC₂₅ = Inhibition Concentration: A point estimate of the toxicant concentration that would cause a given percent reduction (25%) in a non-lethal biological measurement of the test organisms, such as reproduction or growth

Toxicity Calculations

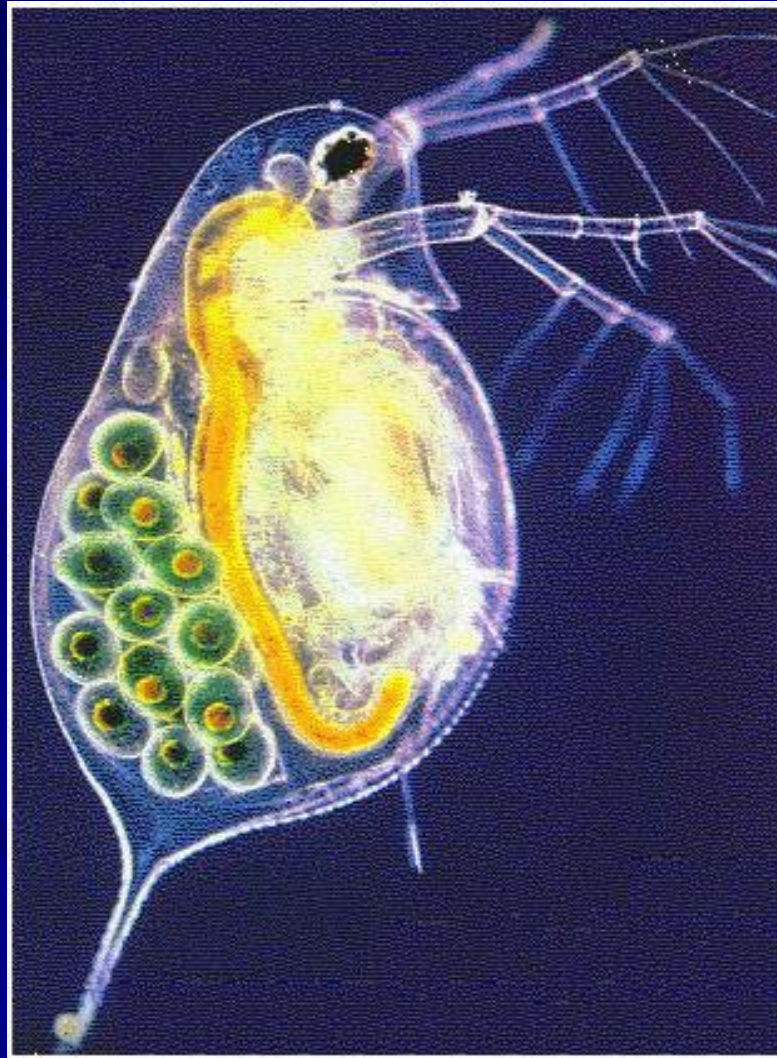
- Toxicity Units (TU) =
(100% / %Effluent concentration of toxic endpoint)
- Acute: $TU_a = 100/LC_{50}$ or $100/EC_{50}$
- Chronic: $TU_c = 100/\text{sq. rt. of } (NOEC \times LOEC)$
or $100/IC_{25}$

All TU cannot be mathematically less than 1

Testing Procedures

- *Ceriodaphnia dubia* (water fleas)
 - 10 replicate samples each containing 1 neonate daphnia.
 - Typical dilution series 6.25%, 12.5%, 25%, 50%, and 100% effluent
 - Upstream sample is used as the diluent and control water (unless toxic)
 - Moderately Hard Reconstituted Water is used as the (alternative) test control
 - Observing survival and reproduction each of the 7 days
 - Test Duration 7 days (only count first 3 broods).

Ceriodaphnia dubia



Ceriodaphnia Dubia Cultures



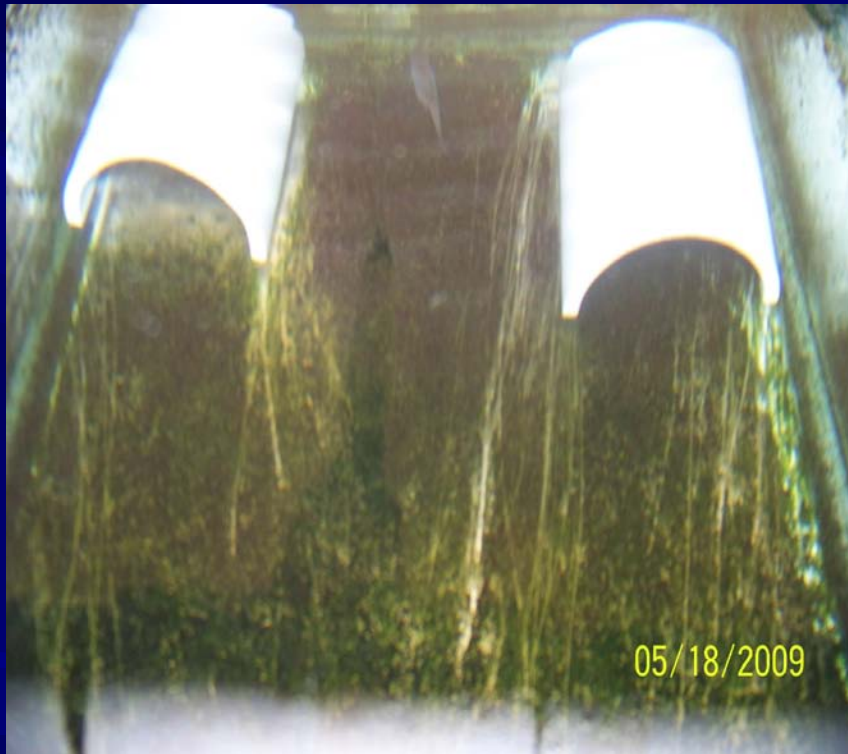
Testing Procedures

- *Pimephales promelas* (fathead minnows)
 - 3 replicates of 10 test organisms per dilution series
 - Typical dilution series 6.25%, 12.5%, 25%, 50%, and 100% effluent
 - Upstream sample is used as the diluent and test control water (unless toxic)
 - Moderately Hard Reconstituted Water is used as the (alternative) test control
- Looking for survival and growth
- Test Duration 7 days

Pimephales promelas



Breeding Tank



Common Test Protocols

- Age of test organisms <24 hours old
 - Neonates age within 6 hrs of one another.*
- Multiple lineages of test organisms required*
- Light, photoperiod and temperature standardized
- Minimum Dissolved Oxygen Concentration 4.0 mg/l
- Feeding schedule standardized

Testing Observations and Records

■ Routine Chemical and Physical Determinations

- DO, Temperature pH measurements at the beginning and end of each 24 hour period in at least one vessel for each test concentration and control
- Temperature and pH are measured at the end of each 24 hour period
- Temperature is measured continuously or in at least two locations and across a sufficient number of test vessels at the end of the 24 hour period to determine variation in temperature in the environmental chamber
- pH is measured in the effluent sample daily
- Conductivity, alkalinity and hardness are measured in each new sample; 100% effluent, receiving water, and control water
- All measurements are recorded on the data sheet.

Testing Observations and Records

■ Routine Biological Observations

- Number of live fish larvae each day
- Number of live adult Daphnia (first 3-4 days)
 - The number of off-spring per adult daphnia (last 3-4 days -3 broods)
- Test duration 7 days
- All observations are recorded on the data sheets.

Example of data Summary Sheet Daphnia

ULEL
Great Lakes Environmental Center

Jackson Pike

DAPHNID STATIC RENEWAL CHRONIC TOXICITY TEST 2,2A

TEST MATERIAL: EFC 5570 TEST SPECIES: C. dubia (916427385)

PROJECT NUMBER: 1446-001324-00 ANIMALS/CONC: 10 /CHAMBER 1 DILUTION WATER: Upstr RW (EFC 5571) PHOTOPERIOD (L:D): 16:8

STARTING DATE/TIME: 6/11/98 1645h YOUNG FROM: WWIMP 5/20 LIGHT INTENSITY (lux): 500-1000 TEST TEMPERATURE (°C): 25±1

TECHNICIANS: DAY: 0 1645h MJC 1 ACM 1515 2 ACM 1515 3 ACM 1310 4 1645 Kpm 5 1330 CDT 6 1230 CDT 7 1130 KPM

Concentration	Day	Test Chamber										pH		DO		Temperature		Spec. Cond.			
		1	2	3	4	5	6	7	8	9	10	New	Old	New	Old	New	Old	New	Old		
Control	0	+	+	+	+	+	+	+	+	+	+	7.9		7.6		24.9					
	1	+	+	+	+	+	+	+	+	+	+	7.9	8.1	7.9	8.3	24.1	24.5	175	174		
	2	+	+	+	+	+	+	+	+	+	+	7.9	8.0	8.4	7.8	24.7	24.9	175	165		
	3	te4	te4	te2	te4	te2	te4	te4	te3	te4	te4	7.9	7.8	8.0	8.0	24.1	24.8	190	166		
	4	te6	te10	te4	te6	te	te6	te8	te5	te7	te6	7.7	8.0	8.0	7.7	25.1	24.8	171	173		
	5	te	te	te	te	te6	te	te	te	te	te	7.7	7.7	8.2	8.2	24.7	24.4	183	169		
	6	te14	te16	te14	te10	te13	te13	te15	te11	te14	te9	7.5	7.9	8.1	8.1	24.6	24.6	169	185		
	7	+	+	+	+	+	+	+	+	+	+	7.9	7.7			24.9			173		
RW Control	0	+	+	+	+	+	+	+	+	+	+	8.0	8.4	7.9	8.8	25.9		510			
	1	te	te	te	te	te	te	te	te	te	te	7.8	8.5	8.2	8.4	24.7	24.5	505	497		
	2	te8	te	te	te	te	te	te	te	te	te	7.8	8.5	8.2	8.4	24.7	24.9	480	497		
	3	te10	te4	te5	te4	te3	te4	te4	te4	te6	te5	7.5	8.3	8.8	8.2	24.3	24.8	549	496		
	4	te10	te9	te11	te10	te11	te11	te10	te11	te11	te10	7.8	8.5	7.5	8.6	24.9	24.8	557	527		
	5	te	te	te14	te15	te11	te17	te16	te20	te18	te15	7.7	8.2	8.4	9.5	25.3	24.4	565	530		
	6	te22	te22	te	te27	te	te25	te26	te23	te23	te2	7.6	8.3	8.4	8.1	24.7	24.6	568	479		
	7	+	+	+	+	+	+	+	+	+	+	8.2	8.2	8.6	8.6	24.8		526			
12.5%	0	+	+	+	+	+	+	+	+	+	+	7.8		7.5		25.2		563			
	1	te	te	te	te	te	te	te	te	te	te	7.9	8.4	7.9	8.7	24.0	24.5	557	541		
	2	te	te	te	te	te	te	te	te	te	te	7.7	8.4	7.8	8.2	24.8	24.9	555	551		
	3	te4	te4	te3	te4	te11	te	te6		te5	te3	7.6	8.3	8.8	8.6	24.3	24.8	590	540		
	4	te8	te8	te10	te8	te9	te10	te12		te11	te11	7.8	8.5	7.5	8.8	24.9	24.8	593	588		
	5	te	te15	te	te15	te	te19	te		te8	te15	7.7	8.3	8.4	8.1	25.4	24.4	627	580		
	6	te20	te1	te18	te	te21	te20	te25	te3	te21		7.5	8.2	8.0	8.1	24.7	24.6	614	560		
	7											8.3		8.7		24.8		592			

Key: + = live, - = dead, e = eggs present

Reviewed by: M. A. Steine Date: 6/10/98

Example Data Summary Sheet

Minnows



FATHEAD MINNOW 7-DAY STATIC-RENEWAL SURVIVAL AND GROWTH TOXICITY TEST

TEST MATERIAL: FEC 5570
PROJECT NUMBER: 1146-00
TREATMENT LEVEL: 100%

NUMBER FRY/CHAMBER: 10
AGE OF FRY/SOURCE: < 24 hrs
DILUTION WATER: RW (FEC 5571)

TEMPERATURE (°C): 25 ± 1
PHOTOPERIOD (L:D): 16:8
LIGHT INTENSITY (lux): 500 - 1000

DATE TIME	TEST DAY	INITIALS	NUMBER DEAD/NUMBER ALIVE			pH (SU)		D.O. (mg/L)		TEMPERATURE °C		SPEC. COND. (µmhos/cm)		OBSERVATIONS
			REP 1	REP 2	REP 3	NEW	OLD	NEW	OLD	NEW	OLD	NEW	OLD	
6-1-98 1700	0	KDM	0/10	0/10	0/10	7.0		8.1		25.1		767		
6-2-98 1530	1	MAG	0/10	0/10	0/10	7.2	7.7	8.1	6.4	24.0	24.2	745	768	
6-3-98 1530	2	KDM	0/10	0/10	0/10	7.1	7.5	7.7	4.6	25.6	24.7	858	775	
6-4-98 1700	3	CZT	0/10	0/10	0/10	7.3	7.4	7.8	4.8	24.1	24.6	830	850	
6-5-98 1610	4	ACM	0/10	0/10	0/10	6.9	7.4	8.2	5.4	25.1	25.1	886	856	
6-6-98 1304	5	ACM	0/10	0/10	0/10	7.1	7.2	9.0	5.6	24.3	24.1	871	876	
6-7-98 1315	6	COT	0/10	0/10	0/10	7.0	7.1	8.7	4.9	24.7	25.0	878	874	
6-8-98 1545	7	ACM	0/10	0/10	1/9		7.2		4.6	24.8		898		

= Normal; ERR = Erratic Swimming; I = Immobilized; PM = Particulate Matter

Reviewed By: Molly A. Dine

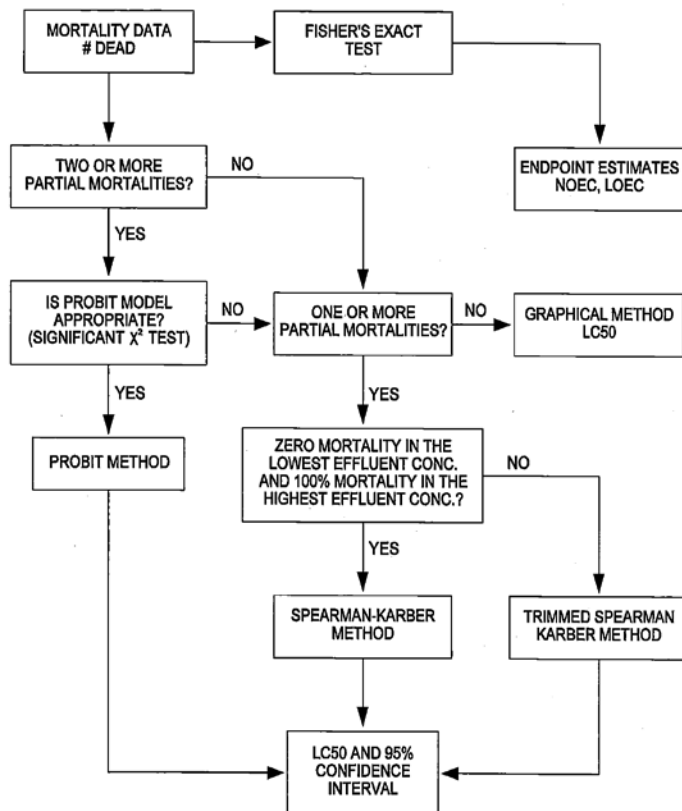
Date: 6/10/98

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Survival

STATISTICAL ANALYSIS OF CERIODAPHNIA SURVIVAL AND REPRODUCTION TEST

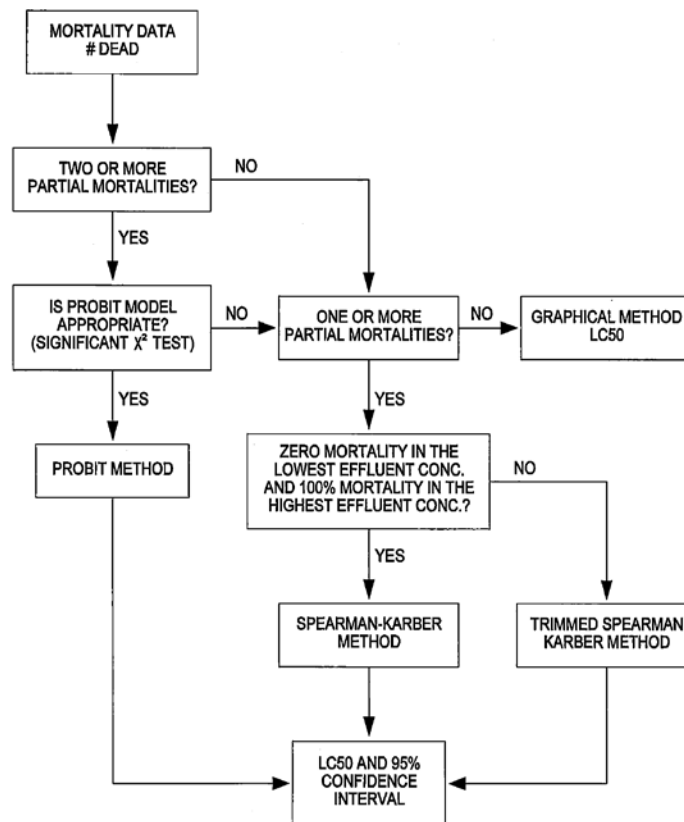
SURVIVAL



Flowchart for statistical analysis of the daphnid, *Ceriodaphnia dubia*, survival data.

STATISTICAL ANALYSIS OF FATHEAD MINNOW LARVAL SURVIVAL AND GROWTH TEST

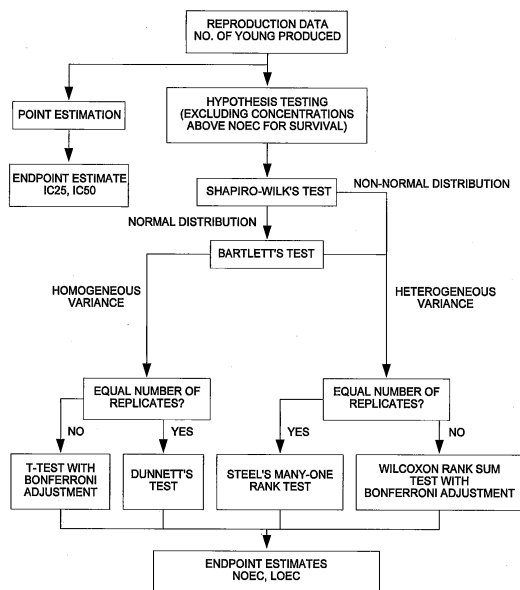
SURVIVAL POINT ESTIMATION



Flowchart for statistical analysis of the fathead minnow, *Pimephales promelas*, larval survival data by point estimation.

Reproduction/Growth

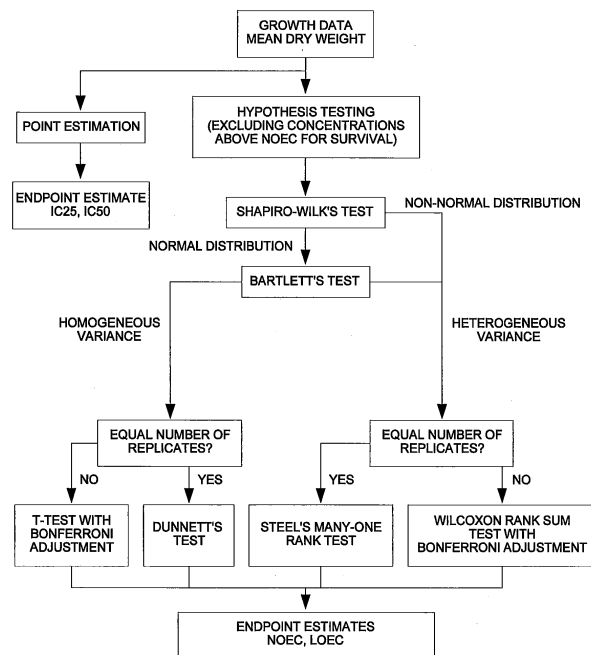
STATISTICAL ANALYSIS OF CERIODAPHNIA SURVIVAL AND REPRODUCTION TEST



Flowchart for the statistical analysis of the daphnid, *Ceriodaphnia dubia*, reproduction data.

STATISTICAL ANALYSIS OF FATHEAD MINNOW LARVAL SURVIVAL AND GROWTH TEST

GROWTH



Flowchart for statistical analysis of fathead minnow, *Pimephales promelas*, larval growth data.

List of possible interferences

- Contaminants in dilution water, glassware, sample hardware and testing equipment
- Improper effluent sampling and handling
- Pathogenic and/or predatory organisms in the dilution water and effluent may affect test organism survival and confound test results
- The amount and type of natural food and nutrients in the effluent or dilution water may confound test results

WET Tests

- Based on all of the above, you could be wondering is this even a viable test to do?
- Yes it is.
- Scientific method.
- Enormous efforts to eliminate variability and provide readily defensible data
- Improvements made as scientists gain experience and endeavor to reduce test variability:
 - age and lineage of test species
 - Adjusting Dilution series used for testing certain effluents: 20%, 40%, 80%, 100% e.g.

What Happened

- OEPA raised concerns about the previous 10 years WET results in 2003 discussions on NPDES permit renewal.
- The City accelerated screening tests using 100% effluent, upstream, and downstream to see if a chronic toxicity issue could be identified.
 - Definitive testing as needed, if persistent toxicity was identified.
- Try to persuade the OEPA that at worst there was an intermittent toxicity issue.
- NPDES Permit 4PF00000*KD issued in 2004 with WET Limits and a compliance schedule.
 - Maximum TUc value of 1.8 for both species,
 - Quarterly testing,
 - Annual average limit of 1.0 TUc

Test Results Reported

Date	Ceriodaphnia dubia TUc	Pimephales promelas TUc
9-Dec-93	<1.0	<1.0
9-Jun-94	<1.0	<1.0
1-Dec-94	1.15	<1.0
11-Jun-95	1.15	<1.0
9-Dec-95	<1.0	<1.0
3-Jun-96	2.8	<1.0
7-Dec-96	>8.3	<1.0
8-Jun-97	<1.0	<1.0
7-Dec-97	1.6	5.8
1-Jun-98	>8.3	<1.0
6-Dec-98	1.2	>8.0
13-Jun-99	<1.0	1.2
5-Dec-99	<1.0	10.3
11-Jun-00	<1.0	<1.0
10-Dec-00	<1.0	<1.0
3-Jun-01	<1.0	<1.0
10-Dec-01	2.1	0
3-Jun-02	1.1	<1.0
2-Dec-02	1.1	<1.0
1-Jun-03	<1.0	<1.0
7-Dec-03	<1.0	<1.0
25-Jan-04	< 1.0*	< 1.0*
23-Feb-04	< 1.0*	< 1.0*
21-Mar-04	< 1.0*	< 1.0*
9-May-04	< 1.0*	< 1.0*
13-Jun-04	< 1.0	< 1.0
18-Jul-04	< 1.0*	< 1.0*
22-Aug-04	< 1.0*	< 1.0*
7-Nov-04	< 1.0	1.2
12-Dec-04	< 1.0	<1.0
6-Feb-05	< 1.0	< 1.0
1-May-05	< 1.0	<1.0
7-Aug-05	< 1.0	< 1.0
11-Sep-05	< 1.0	< 1.0
2-Oct-05	< 1.0	< 1.0
6-Nov-05	< 1.0	< 1.0
4-Dec-05	< 1.0	< 1.0
8-Jan-06	<1.0	<1.0
7-Feb-06	<1.0	<1.0

* Screening only no toxicity detected at 100%

Toxicity Endpoints (I'm Back)

■ Acute

- Mortality at 48 hours for *Ceriodaphnia dubia*
- Mortality at 96 hours for *Pimephales promelas*

■ Chronic

- Survival over 7 day test (both species)
- Fish Growth (dry weight after test period)
- Reproduction *Ceriodaphnia dubia* (total # of offspring – 3 broods)

Points to Ponder

- Do we even have Chronic Toxicity? Or is it more likely Intermittent Acute Toxicity
 - Does the observed toxic effect occur with test initiation
 - Or is it observed after a subsequent static renewal interval?
- Do we have Intermittent Chronic Toxicity?
 - Is it related to the time of year the test was done (winter vs. summer)
 - Was it related to plant construction activities or start up of new processes, chemical addition, etc.
- Intermittent Dilution Water Toxicity – upstream control
- What if all three conditions occur

Data Summary Sheets

CHRONIC TOXICITY TEST RESULTS FOR *Ceriodaphnia dubia*

TABLE 4

Results of 7-Day <i>Leptodaphnia dubia</i> Survival and Reproduction Test Conducted 6/1/98 - 6/8/98 Using Effluent from Outfall 001.										
Test Solutions	Cumulative Percent Mortality* (Cumulative Percent Adversely Affected)* Test Day							Number of Young Produced*		
	1	2	3	4	5	6	7	Total	Mean	
Primary Control/ Dilution Water (RW)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	443	44.3	
Secondary Control (DMW)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	228	22.8	
12% Effluent	10 (10)	10 (10)	10 (10)	10 (10)	10 (10)	10 (10)	10 (10)	324	32.4*	
25% Effluent	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	285	28.5*	
50% Effluent	100 (100)	100 (100)	100 (100)	100 (100)	100 (100)	100 (100)	100* (100)	0	0.0	
75% Effluent	100 (100)	100 (100)	100 (100)	100 (100)	100 (100)	100 (100)	100* (100)	0	0.0	
100% Effluent	100 (100)	100 (100)	100 (100)	100 (100)	100 (100)	100 (100)	100* (100)	0	0.0	
LC ₅₀ Values:	34.7	34.7	34.7	34.7	34.7	34.7	34.7	Calculated TUc Value for Survival: 2.8		
95% Confidence Limits LL	NA	NA	NA	NA	NA	NA	NA			
UL	NA	NA	NA	NA	NA	NA	NA	Calculated TUc Value for Reproduction: > 8.3		
EC ₅₀ Values:	34.7	34.7	34.7	34.7	34.7	34.7	34.7			
95% Confidence Limits LL	NA	NA	NA	NA	NA	NA	NA			
UL	NA	NA	NA	NA	NA	NA	NA			
7-Day NOEC for Mortality: 25%	7-Day NOEC for Reproduction: <12%							Method(s) Used to Determine Values: Mortality - Fisher's Reproduction - Dunnett's		
7-Day LOEC for Mortality: 50%	7-Day LOEC for Reproduction: 12%									
Chronic Value for Mortality: 35.5%	Chronic Value for Reprod.: <12%									
IC ₂₅ = 14.7%										

a - indicate significant differences from the primary control with an * ($p < 0.05$).

CHRONIC TOXICITY TEST RESULTS FOR FATHEAD MINNOWS (*Pimephales promelas*)

TABLE 6

Results of a 7-Day <i>Pimephales promelas</i> Survival and Growth Test Conducted 6/1/98 - 6/8/98 Using Effluent from Outfall 001										
Test Solutions		Cumulative Percent Mortality* (Cumulative Percent Adversely Affected)* Test Day							Dry Weight (per number initiated)*	
		1	2	3	4	5	6	7	Total	Mean
Primary Control/ Dilution Water (RW)		0 (0)	0 (0)	3 (3.3)	16.7 (16.7)	33.3 (33.3)	36.7 (36.7)	40 ^b (40)	8.92	0.2973
Secondary Control (MH)		0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	13.64	0.4547
12% Effluent		0 (0)	0 (0)	0 (0)	3.3 (3.3)	13.3 (13.3)	20 (20)	20 (20)	10.54	0.3513
25% Effluent		0 (0)	0 (0)	3.3 (3.3)	10 (10)	23.3 (23.3)	23.3 (23.3)	23.3 (23.3)	10.92	0.3640
50% Effluent		0 (0)	0 (0)	10 (10)	23.3 (23.3)	43.3 (43.3)	60 (60)	63.3 (63.3)	5.02	0.1673
75% Effluent		0 (0)	0 (0)	0 (0)	10 (10)	33.3 (33.3)	40 (40)	43.3 (43.3)	7.91	0.2637
100% Effluent		0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	3.3 (3.3)	13.51	0.4503
LC ₅₀ Values:		>100	>100	>100	>100	24.3	21.9	22.2	Calculated TU Value for Survival: <1.0	
95% Confidence Limits	LL UL	NA NA	NA NA	NA NA	NA NA	5.2 114.0	10.2 47.2	12.6 39.0		
EC ₅₀ Values:		>100	>100	>100	>100	24.3	21.9	22.2	Calculated TU Value for Growth: <1.0	
95% Confidence Limits	LL UL	NA NA	NA NA	NA NA	NA NA	5.2 114.0	10.2 47.2	12.6 39.0		
7-Day NOEC for Mortality: 100%				7-Day NOEC for Growth: 100%				Method(s) Used to Determine Values: Mortality - t-test Growth - t-test		
7-Day LOEC for Mortality: >100%				7-Day LOEC for Growth: >100%						
Chronic Value for Mortality: >100%				Chronic Value for Growth: >100%						
a - indicate significant differences from the primary control with an * ($p < 0.05$). b - secondary (laboratory) control used for statistical analysis due to toxicity in primary (receiving water) control.										

Compliance Procedure

- What was required by the Permit
 - Initiate a Toxicity Reduction Evaluation (TRE) by December of 2005.
 - Submit a General Plan for “Toxicity” Reduction in March 2006.
 - Execute the General Plan.
 - Submit Annual Reports (September 2006, 2007, 2008, 2009)
 - Submit a Specific Plan for “Toxicity” reduction due January 2008.
 - Full Compliance by November 2009

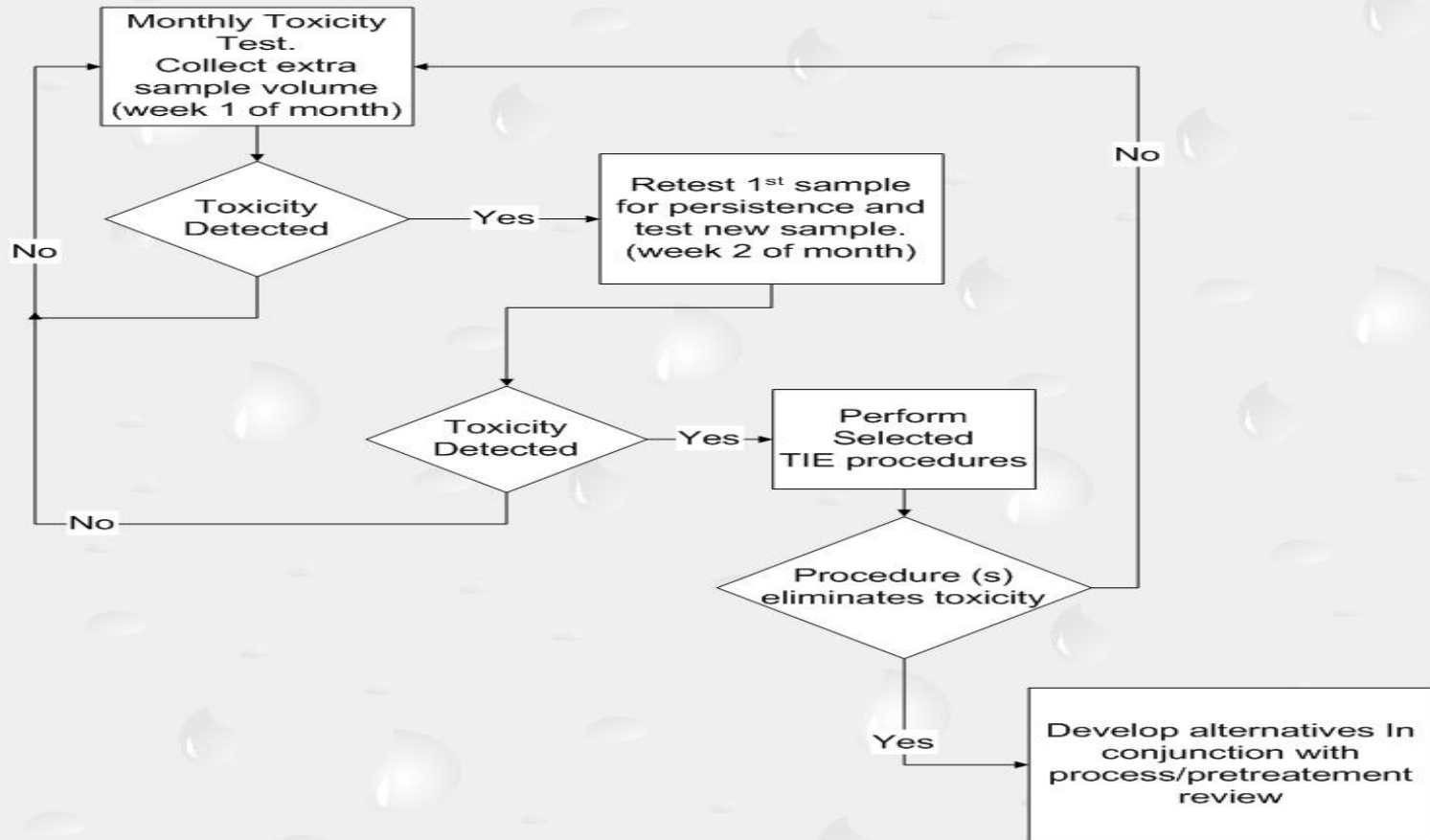
TRE - What We did

- Secured the services of a consultant to help us through the process.
- The TRE is a two stage process
- Toxicity Identification Evaluation (TIE) is a series of tests (on an effluent exhibiting toxic characteristics) to determine what is the physical, chemical, or biological property of the effluent causing toxicity.
- TRE is an engineering evaluation of plant processes to provide the treatment solution(s) necessary to remove the cause identified in the TIE.

General Plan Activities

- Review of Sampling and QA/QC protocols
- WET Laboratory review and selection
- Engineering review of Plant process to identify possible plant toxicity sources
 - Chemicals used in treatment processes
 - Recycle streams
 - Stormwater controls
- Review of Significant Industrial Users to Identify possible external sources of toxicity

TIE/TRE Process



What is Required for to Conduct a TIE?

- Persistent Effluent toxicity as a result of physical, chemical or biological constituents in the effluent.

TIE – Two Tier Approach

- Tier 1 – Approach involves manipulation of effluent samples:
 - Filtration
 - Aeration
 - Use of additives to chelate or reduce toxicants (EDTA)
 - Minor pH adjustments
 - Phase Separation techniques with C_{18} solid phase extraction (SPE) resin to remove possible organics
- Samples manipulated at the initial pH of the effluent (pH_i)

TIE – Two Tier Approach (Cont.)

- Tier 2 – Consists of performing the same manipulation steps on the effluent after adjusting samples to pH 3 and pH 10.
 - After manipulation completion readjust pH to effluent pH_i
- Compare the results with an unaltered effluent sample.

Results of Sampling

TABLE 2. Results of Whole Effluent Toxicity Testing Jackson Pike Wastewater Treatment Plant		
Date	<i>Ceriodaphnia dubia</i> TUc	<i>Pimephales promelas</i> TUc
Sept-06	< 1.0	< 1.0
Oct-06	< 1.0	< 1.0
Nov-06	< 1.0	< 1.0
Dec-06	< 1.0	< 1.0
Jan-07	< 1.0	< 1.0
Feb-07	< 1.0	< 1.0
Mar-07	< 1.0	< 1.0
Apr-07	< 1.0	< 1.0
May-07	< 1.0	< 1.0
June-07	< 1.0	< 1.0
09-July-07	1.2	< 1.0
09-July-07 Retest 7/17		
<i>C. dubia</i>	< 1.0	NA
17-Jul-07	< 1.0	NA
Aug-07	< 1.0	< 1.0
Sep-07	< 1.0	< 1.0
Oct-07	< 1.0	< 1.0
04-Nov-07	< 1.0	< 1.0
25-Nov-07	< 1.0	< 1.0
Jan-08	< 1.0	< 1.0
Feb-08	< 1.0	< 1.0
Mar-08	< 1.0	< 1.0
Apr-08	< 1.0	< 1.0
May-08	< 1.0	< 1.0
Aug-08	< 1.0	< 1.0
Nov-08	< 1.0	< 1.0
Feb-09	< 1.0	< 1.0
May-09	< 1.0	< 1.0
Aug-09	< 1.0	< 1.0
Nov-10	< 1.0	< 1.0

Specific Plan

- Plant improvements required to attain compliance – Report due 01/01/2008
 - Demonstration that “Toxicity” meets limits
 - Plant modifications or process changes identified.
 - Pre-treatment Program changes required.
 - Demonstration that toxicity is not persistent, reproducible or identifiable.
 - Complete a PTI if required.
 - Schedule for construction.

2008 – 2010

- Continued monitoring Effluent using definitive testing on a quarterly basis as outlined in the permit.
- Formally requested removal of the limit from the permit - Part II, Paragraph Z.
- Met with Ohio EPA to discuss permit renewal.
- Successfully had WET limits removed from NPDES permit 4PF00000*OD (August 2010) and sampling frequency reduced to semi-annual.

Lessons Learned

- Process changes to accommodate various construction related activities can significantly impact stable operations, which in turn may influence the WET. (Ammonia – bleed through, start up shutdown of Sodium Hypochlorite/Bisulfite chemical system, change in polymer, salt on floors, etc.)
- Dilution Series may need to be adjusted to bracket the higher end of the scale: 20%, 40%, 60%, 80%, 100% to get more definitive results.
- Upstream Toxicity or the additive effects thereof, when combined with effluent, may need to be identified.
 - Combined Sewer discharges and other point and non-point source discharges may influence results
- Use of Moderately Hard Re-constituted Water for dilution water may be required if persistent upstream toxicity exists.

Lessons Learned

■ Data Interpretation

- The TU number should not be a stand alone value devoid of the context in which it was generated.

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