
Reasonable Potential Analyzer - Fact Sheet Appendix B

Determining "Reasonable Potential" for Excursions Above Ambient Criteria Using Effluent Data Only

EPA recommends finding that a permittee has “reasonable potential” to exceed a receiving water quality standard if it cannot be demonstrated with a high confidence level that the upper bound of the lognormal distribution of effluent concentrations is below the receiving water criteria at specified low-flow conditions.

Step 1 Determine the number of total observations (“n”) for a particular set of effluent data (concentration or toxic units [TUs]), and determine the highest value from that data set.

Step 2 Determine the coefficient of variation for the data set. For a data set where $n < 10$, the coefficient of variation (CV) is estimated to equal 0.6, or the CV is calculated from data obtained from a discharger. For a data set where $n > 10$, the CV is calculated as standard deviation/mean. For less than 10 items of data, the uncertainty in the CV is too large to calculate a standard deviation or mean with sufficient confidence.

Step 3 Determine the appropriate ratio from the table below.

Step 4 Multiply the highest value from a data set by the value from the table below. Use this value with the appropriate dilution to project a maximum receiving water concentration (RWC).

Step 5 Compare the projected maximum RWC to the applicable standard (criteria maximum concentration, criteria continuous concentration [CCC], or reference ambient concentration). EPA recommends that permitting authorities find reasonable potential when the projected RWC is greater than an ambient criterion.