Reasonable Potential Analyzer

Facility Name: OHLP Mont Belvieu NGL Fractionation Plant

NPDES Permit Number: TX0140091 Outfall Number: 102

Proposed Critical Dilution*: 74

***Critical Dilution in draft permit, do not use % sign.**

Enter data in yellow shaded cells only. Fifty percent should be entered as 50, not 50%.

Test Data

	VERTEBRATE				INVERTEBRATE			
Date (mm/yyyy)	Lethal NOEC	Sublethal NOEC	Lethal TU	Sublethal TU	Lethal NOEC	Sublethal NOEC	Lethal TU	Sublethal TU
Sep-14	11	11	9.09	9.09	11	11	9.09	9.09
Mar-15	11	11	9.09	9.09	11	11	9.09	9.09
Jun-15	11	11	9.09	9.09	11	11	9.09	9.09
Sep-15	11	11	9.09	9.09	11	11	9.09	9.09
Dec-15	11	11	9.09	9.09	11	11	9.09	9.09
Mar-15	11	11	9.09	9.09	11	11	9.09	9.09
Jun-15	11	11	9.09	9.09	11	11	9.09	9.09
Sep-15	11	11	9.09	9.09	11	11	9.09	9.09
Dec-15	11	11	9.09	9.09	11	11	9.09	9.09
Mar-16	11	11	9.09	9.09	11	11	9.09	9.09
Jun-16	11	11	9.09	9.09	11	11	9.09	9.09
Sep-16	11	11	9.09	9.09	11	11	9.09	9.09
Dec-16	11	11	9.09	9.09	11	11	9.09	9.09
Mar-17	11	11	9.09	9.09	11	11	9.09	9.09
Jun-17	11	11	9.09	9.09	11	11	9.09	9.09
Sep-17	11	11	9.09	9.09	11	11	9.09	9.09
Dec-17	11	11	9.09	9.09	11	11	9.09	9.09
Mar-18	11	11	9.09	9.09	11	11	9.09	9.09
	11	11	9.09	9.09	11	11	9.09	9.09
Count			18	18			18	18
Mean			9.091	9.091			9.091	9.091
Std. Dev.			0.000	0.000			0.000	0.000
CV			0.0	0			0	0
RPMF			#N/A	#N/A			#N/A	#N/A

			Reasonable Potential Acceptance Criteria
		1.351	
Vertebrate Lethal	#N/A	#N/A	Reasonable Potential exists, Permit requires WET monitoring and WET li
Vertebrate Sublethal	#N/A	#N/A	Reasonable Potential exists, Permit requires WET monitoring and WET li
Invertebrate Lethal	#N/A	#N/A	Reasonable Potential exists, Permit requires WET monitoring and WET li
Invertebrate Sublethal	#N/A	#N/A	Reasonable Potential exists, Permit requires WET monitoring and WET li

*** The proposed critical dilution has increased from 8% to 64% and 74%. This RP analysis concludes there is reasonable potential because the NOECs listed are all 11%, however the true NOEC in all cases was >11% with 11% being the highest effluent concentration tested. EPA concludes there is no data available to acurately statistically analyze reasonable potential at the final outfalls 001 and 002 based on the data provided for the internal outfall 101. Based on the history of compliance at Outfall 101 and the fact that the predominant effluent at 001 and 002 is similar to 101, monitoring only is recommended at the external outfalls, with no limit.**