Reasonable Potential Analyzer

Facility Name **King Ranch Gas Plant**

NPDES Permit Number **TX0030279**   Outfall Number **001**

Proposed Critical Dilution* **60**

*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

Date (mm/yyyy)	VERTEBRATE				INVERTEBRATE			
	Lethal NOEC	Sublethal NOEC	Lethal TU	Sublethal TU	Lethal NOEC	Sublethal NOEC	Lethal TU	Sublethal TU
12/12/16	75	75	1.33	1.33				
01/30/17	100	100	1.00	1.00	100	56	1.00	1.79
02/27/17	100	100	1.00	1.00	100	100	1.00	1.00
03/27/17	100	100			100	75		
04/24/17	100	100	1.00	1.00	100	42	1.00	2.38
05/22/17					80	80	1.25	1.25
06/26/17					80	80	1.25	1.25
07/24/17					80	80	1.25	1.25
12/04/17	80	80	1.25	1.25				
01/08/18					80	25	1.25	4.00
02/05/18	80	80	1.25	1.25	80	80	1.25	1.25
03/05/18					80	80	1.25	1.25
04/09/18	80	80	1.25	1.25	80	60	1.25	1.67
07/23/18	80	25	1.25	4.00	80	60	1.25	1.67
08/27/18	80	80	1.25	1.25				
09/24/18	80	80	1.25	1.25				
10/15/18	80	80	1.25	1.25	80	80	1.25	1.25
2/25/19	80	80	1.25	1.25	80	80	1.25	1.25
6/17/19	80	80	1.25	1.25	80	45	1.25	2.22
7/29/19					80	80	1.25	1.25
8/26/19	80	80			80	80		
9/30/19					80	80		
12/10/19	80	80	1.25	1.25	80	80	1.25	1.25
	75	25	1.33	4.00	80	25	1.25	4.00
Count			14	14			16	16
Mean			1.202	1.399			1.203	1.623
Std. Dev.			0.112	0.757			0.101	0.742
CV			0.1	0.5			0.1	0.5
RPMF			1.1	1.4			1.1	1.4

1.667 Reasonable Potential Acceptance Criteria

Vertebrate Lethal   0.880   No Reasonable Potential exists. Permit requires WET monitoring, but no WET

Vertebrate Sublethal   3.360   Reasonable Potential exists, Permit requires WET monitoring and WET limit.

Invertebrate Lethal   0.825   No Reasonable Potential exists. Permit requires WET monitoring, but no WET

Invertebrate Sublethal   3.36   Reasonable Potential exists, Permit requires WET monitoring and WET limit.

Reasonable Potential Analyzer

Facility Name | King Ranch Gas Plant

NPDES Permit Number | TX0030279 | Outfall Number | 001

Proposed Critical Dilution* | 60

*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

Date (mm/yyyy)	VERTEBRATE				INVERTEBRATE			
	Lethal NOEC	Sublethal NOEC	Lethal TU	Sublethal TU	Lethal NOEC	Sublethal NOEC	Lethal TU	Sublethal TU

Reasonable Potential Analyzer

> ### 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>0, the CV is calculate 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.

Reasonable Potential Analyzer

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

Reasonable Potential Analyzer

Reasonable Potential Analyzer