UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

MEMORANDUM

SUBJECT: NPDES Permitting Strategy for OCPSF Industry Direct Dischargers

FROM: James R. Elder, Director
Office of Water Enforcement and Permits (EN-335)

TO: Regional Water Management Division Directors
NPDES Delegated State Directors

As you know, the final rule establishing effluent limitations guidelines, pretreatment standards, and new source performance standards for the organic chemicals, plastics, and synthetic fibers (OCPSF) point source category (the "guidelines") was promulgated on November 5, 1987 and became effective on December 21, 1987. While the Agency was sued on the guidelines by numerous parties, the guidelines are in effect except for a voluntary remand of the pollutant Bis (2-Chloroisopropyl) ether for BAT and NSPS about which you were notified on November 30, 1988. We will keep you apprised of the status of the litigation. In addition, the Agency provided an implementation guidance and a list of questions and answers regarding the guidelines to NPDES permitting authorities on February 8 and October 12, 1988, respectively.

The purpose of this memorandum is to provide you with the NPDES Permitting Strategy for OCPSF Industry Direct Dischargers (the "strategy"). At the request of permitting authorities and permittees, this strategy was developed to assist permitting authorities in determining when and how to implement the guidelines.

At the October National Branch Chiefs' Meeting in Wintergreen, Virginia, we distributed and requested comments on a draft flow chart (given as Attachment A of this strategy) which provides an overview of the decision-making procedure involved in implementing the strategy. The seven sections in the strategy are narrative descriptions of each step in the flow chart.

In the strategy, we request that the permitting authority immediately reissue OCPSF permits that have already expired or will expire before September 30, 1989, to reflect the guidelines. For permits which expire after October 1, 1989, the

permitting authority must use the procedure in the flow chart (or use Sections 1 - 7 of the strategy) to determine whether the permit should be reissued before the expiration date. The strategy requires the permitting authority to perform the following tasks after reviewing all the relevant documents (as described in Section 1).

(1) Water Quality Review

Section 2 describes how to assess the water quality impacts imposed by the §304(l) requirements. OCPSF facilities listed on the "C List" must comply with the §304(l) requirements and must be treated separately in accordance with the "Final Guidance for Implementation of Requirements under §304(l) of the Clean Water Act as amended", March 1988.

(2) Authority to Reopen Permits

Section 3 describes how the permitting authority determines whether the permit can be reopened upon promulgation of new guidelines. After this determination is made, all permitting authorities must conduct compliance assessments unless the authority elects to reopen all permits.

(3) Compliance Assessment

Section 4 provides guidance on determining whether facilities are currently discharging pollutants at levels that would exceed the new BPT and/or BAT guidelines. A compliance assessment procedure is provided in Attachment C for your convenience. A worksheet (Attachment C-1) has been devised for you to perform this task efficiently. For complying facilities, reissue the permit upon expiration. For non-complying facilities, the permitting authority should either provide the assessment results to the facilities and notify them that immediate compliance is expected upon permit reissuance or follow the priority determination procedure (as provided in Sections 5, 6, and 7) based on the results of items (2) and (3).

(4) Priority Determination

Sections 5, 6, and 7 provide guidance on how to establish the permit reissuance priority where there is authority to reopen the permit upon promulgation of new guidelines and the facility currently discharges pollutants at levels that would exceed the new guidelines. Discharges into near-coastal waters have been designated in this strategy as having the highest priority for permit

reissuance (Section 5). Section 6 contains six other significant factors to be considered in establishing priorities in the reissuance schedule. For high priority permits which are to be reopened, the compliance deadline in the permit is March 31, 1989. For the facilities which cannot comply with the new permit limits by March 31, 1989, an administrative order may be issued to establish a compliance schedule as expeditiously as practicable, but no later than three years after the effective date of the reissued permit. For the permits which the permitting authority decides not to reopen prior to the expiration date, the permitting authority must use letters to request submission of compliance plans from the permittee. A sample information request letter is provided in Attachment D for your use.

In summary, we believe that, by implementing this strategy, we can accelerate compliance with the new guidelines and adequately control the most significant OCPSF dischargers.

Also included in this document is a list of known OCPSF active direct dischargers (Attachment B). Please review the permit files of those facilities in your Region/State to identify the ones which currently discharge OCPSF process wastewater as defined in 40 CFR 414.11. Delete from the list any facility which does not discharge OCPSF process wastewater and/or add to the list any additional OCPSF facilities, then submit the amended list to me by **March 10, 1989**. NPDES delegated States should also send a copy of the amended list to the Region. If you have any questions or concerns about the implementation of the strategy, please submit them with the amended list.

For further questions, please contact me (FTS 475-8488) or have your staff contact James Gallup, Chief of the Technical Support Branch (FTS 475-9541) or Gene Chou (FTS 382-6960) of this staff.

Attachments

cc: Susan Lepow (LE-132W)
Martha Prothro (WH-551)
J. William Jordan (EN-338)

EPA GUIDANCE

ON

NPDES PERMITTING STRATEGY

FOR

OCPSF INDUSTRY DIRECT DISCHARGERS

February 1989

U.S. Environmental Protection Agency
Office of Water
Office of Water Enforcement and Permits
401 M Street, S.W.
Washington, D.C. 20460

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EPA GUIDANCE ON

NPDES PERMITTING STRATEGY FOR OCPSF INDUSTRY DIRECT DISCHARGERS

PURPOSE OF THIS GUIDANCE

This guidance provides NPDES permitting authorities with a national strategy to accelerate compliance with the newly promulgated effluent limitations guidelines for the organic chemicals, plastics, and synthetic fibers (OCPSF) point source category (the "guidelines"). The strategy is designed to assist permitting authorities to determine how to implement the guidelines using all available authorities and permitting tools.

BACKGROUND

- The final guidelines for the OCPSF category were promulgated on November 5, 1987. The rule became effective on December 21, 1987.
- The Statutory deadline for BAT compliance is March 31, 1989 [Section 301(b) of the Water Quality Act of 1987].
- Over four hundred OCPSF direct dischargers are currently permitted under the NPDES program based on best professional judgments (BPJ) of the permit writers.
- EPA provided an implementation guidance and a list of questions and answers regarding the guidelines to permitting authorities for OCPSF direct dischargers on February 8, 1988 and on October 12, 1988, respectively.

The strategy to accelerate compliance with the new guidelines is given in the following sections. All permits referred in this strategy are NPDES direct discharge permits for facilities discharging OCPSF process wastewater as defined by the guidelines.

PERMITS EXPIRED AND EXPIRING BEFORE SEPTEMBER 30, 1989

Permits which have expired and will be expiring before September 30, 1989 should be reissued expeditiously to reflect the guidelines during FY-89. These permits should also address concerns regarding water quality-based requirements including toxicity testing (See pages 7 and 8 of the OCPSF implementation guidance memo, February 8, 1988). Also, if these facilities are on the section 304(l) C List (see Sections 1.b and 2.b of this strategy for more descriptions), their permits should be issued

expeditiously and incorporate both guideline limits or water quality-based limits whichever is more stringent.

PERMITS EXPIRING AFTER OCTOBER 1, 1989

For permits which will expire after October 1, 1989, the permitting authority must determine whether the permit should be reissued before the expiration date. The review process to determine whether or not to reopen the permit includes the following steps:

(1) review of permit files, §304(l) lists, State regulation, Permit Compliance System (PCS), the 1983 §308 survey data, and the 48 Plant Sampling Database;
(2) assessment of water quality impacts including discharges to §304(l) waters;
(3) determination of authority to reopen permits;
(4) assessment of compliance with BPT and BAT guidelines;
(5) identification of near-coastal dischargers;
(6) determination of priority for permit reissuance; and
(7) reissuance of permits.

This process should ensure that the most significant discharges are controlled by using all available authorities and permitting tools. Attachment A is a flow chart for the implementation of the guidelines for dischargers whose permits will expire after October 1989. A narrative description of the flow chart is given in Sections 1 through 7.

SECTION 1. REVIEW OF PERMIT FILES, §304(l) LISTS, STATE AUTHORITY TO REOPEN, PCS, THE 1983 §308 SURVEY DATA, AND THE 48 PLANT SAMPLING DATABASE

A list of the known OCPSF facilities by Region is given in Attachment B. Each permitting authority must review the permit files of these facilities to identify the facilities which currently discharge OCPSF process wastewater as defined in 40 CFR 414.11. Delete from the list any facility which does not discharge OCPSF process wastewater and/or add to the list any additional known OCPSF facilities, then submit the amended list to EPA, Office of Water Enforcement and Permits (OWEP), Permits Division, 401 M Street, S.W., Washington D.C. 20460 by **March 10, 1989**.

After identifying OCPSF facilities, the permitting authority should review the following documents:

1.a. Permit Files

Review information in the permit files, e.g., the discharger's manufacturing product/process, annual production rates, wastewater treatment system, water usage, discharge characteristics, current permit limits, and whether the permit has specific reopener clause. Also review the Discharge Monitoring Reports (DMRs). This information will be used in Section 4.

1.b. §304(l) Lists

Section 304(l) of the Clean Water Act (CWA) requires States to develop lists of waters impaired by point and nonpoint sources. Section 304(l)(1) requires that by February 4, 1989, each State submit a priority list (also known as the "Short List") of waters impaired by point sources, a list of the point sources (also known as the "C List") and amounts of pollutants they discharge which cause toxic impacts, and an individual control strategy (ICS) for each such point source. Permitting authorities must identify OCPSF facilities which discharge into waters on the Short List. This information will be used in Section 2.

In addition to the Short List, Section 304(l)(1) also requires that by February 4, 1989, each State submit a comprehensive list (also known as the "Long List") of waters impaired by any toxics or nontoxics due to either point or nonpoint sources. The Long List includes all waters whose beneficial uses are less than the fishable/swimmable goal of the CWA as well as those which are not meeting water quality standards for established beneficial uses. Permitting authorities must also identify OCPSF facilities which discharge into waters on the Long List. This information will be used in Section 6.a.

1.c. State Authority to Reopen

Examine whether the State has authority to reopen permits upon promulgation of new guidelines. This information will be used in Section 3.

1.d. PCS Data

Review permit information and DMRs in PCS. This information will be used in Section 4.

1.e. The 1983 §308 Survey Data

The 1983 §308 survey data were collected during the development of the guidelines. They are based on the 1980 production/effluent data. This information will be used in Section 4.

1.f. The 48 Plant Sampling Database Compiled by EPA

This database was generated by sampling 48 facilities for use in the development of the guidelines. This information will be used in Section 4.

SECTION 2. ASSESSMENT OF WATER QUALITY IMPACTS INCLUDING DISCHARGES TO §304(l) WATERS

Section 304(l) focuses national surface water quality protection programs immediately on addressing known water quality problems due entirely or substantially to point source discharges of priority pollutants. Controls for these pollutants must be established as soon as possible but no later than the statutory time frames set forth in §304(l). The following three steps apply to the OCPSF facilities which discharge into waters on the Short List as described in Section 1.

2.a. Does the facility cause or contribute to an excursion above Water Quality Standards?

When an OCPSF facility is identified as a point source which discharges into a water on the Short List, the State must first determine whether the facility is causing or contributing to the excursion above numeric or narrative water quality standards of the receiving water. If so, proceed to step 2.b. If not, go to Section 3.

2.b. Should the facility be listed under §304(l)(1)(C) (also known as the "C List")?

When an OCPSF facility is identified as a contributor to the excursion above numeric or narrative water quality standards of the receiving water, the State must assess whether the impairment is due to discharge of priority pollutants. If not, go to Section 3. If so, the facility should be further evaluated for a determination of whether water quality standards can be achieved after technology-based requirements (e.g., the new BAT) have been met. If meeting technology-based requirements will result in achievement of water quality standards, go to Section 3. If not, the facility should

be listed as a point source on the C List. Proceed to Step 2.c for the facilities on the C List.

2.c. Submit ICS by February 4, 1989

For the facilities listed on the C List, an ICS which would reduce the discharge of priority pollutants was required to be issued by February 4, 1989. Each ICS should consist of a final enforceable NPDES permit with limits at least as stringent as the new BAT and accompanying documentation (e.g., a fact sheet or a statement of basis for the permit). EPA's deadline for approving or disapproving the ICSs is June 4, 1989. Where a State has not issued a final permit by February 4, 1989, a draft permit and supporting documentation were acceptable as an ICS. Such a draft permit was to be accompanied by a schedule indicating when the final permit will be issued and providing adequate time for the permittee to comply with the limits such that water quality standards will be achieved by June 4, 1992. NOTE: This section summarizes only the key elements of §304(l) which relate to this OCPSF permitting strategy. Consult the "Final Guidance for Implementation of Requirements under Section 304(l) of the Clean Water Act as amended", March 1988, for a full description of the §304(l) submittal requirements.

For dischargers not included on the C List, use the procedures in Sections 3 through 7 as follows:

SECTION 3. DETERMINATION OF AUTHORITY TO REOPEN PERMITS

If a permitting authority has reopener clause in the permit or has State authority to reopen permits upon promulgation of new guidelines, proceed to Step 3.a or 3.b. If a permitting authority does not have either reopener clause in the permit or does not have State regulation providing authority to reopen permits upon promulgation of new guidelines, a compliance assessment must be conducted. The compliance assessment procedure is described in Section 4.

3.a. For permitting authorities which elect to reopen all permits

Permitting authorities which have either specific reopener clauses in their permits or have State authority to reopen permits upon promulgation of new guidelines may elect to reopen all permits before permits expire. Compliance deadline in the permit may be established up to March 31, 1989. If the permittee cannot comply with the new permit limits by March 31, 1989, an

administrative compliance order (AO) may be issued to establish a compliance schedule which is as expeditious as practicable, but no later than three years beyond the effective date of the reissued permit. The AO normally would be prepared and publicly noticed simultaneously with the draft permit.

3.b. For permitting authorities without sufficient resources to reopen all permits

If a permitting authority has authority to reopen the permit, but does not have sufficient resources to reopen all the permits, compliance assessments must be conducted. The permitting authority should follow the procedure as described in Step 4.b to assess the compliance of the facilities with the new guidelines. The assessment provides a basis for the permitting authority to prioritize the reopening candidates in order to bring the most significant non-complying facilities into compliance with the new guidelines as expeditiously as practicable.

SECTION 4. ASSESSMENT OF COMPLIANCE WITH BPT AND BAT GUIDELINES

The objective of the compliance assessment is to determine whether facilities are currently discharging pollutants at levels that would exceed the new BPT and/or BAT guidelines. Attachment C provides a step-by-step procedure of how to conduct this assessment. Examples are given along with each step. A three-page worksheet for OCPSF permit limits calculation, an example of how the worksheet is used, and a four-page summary of OCPSF guidelines are also provided in Attachments C-1, C-2, and C-3, respectively.

The permitting authority should use all available data to assess the compliance status. Existing data such as the 1983 §308 survey data based on the 1980 production/effluent data, the 48 plant sampling database compiled by EPA, effluent flow and quality data on Form 2C, and DMRs should all be used. If existing data is insufficient to assess the compliance, an information request letter may be used, on a case-by-case basis, to solicit additional production or self-monitoring data from the permittees. A sample information request letter for this purpose is provided as Option 1 in Attachment D.

4.a. Permit without Reopener Clause or State General Authority to Reopen Permits upon Promulgation of New Guidelines

If a permitting authority does not have either reopener clause in the permit or does not have State regulation providing authority to reopen permits upon

promulgation of new guidelines, a compliance assessment must be conducted (see Section 3). After the compliance assessment has been completed, one of the following steps should be taken:

4.a.1. For complying facilities

For those facilities which discharge at levels at or below the new BPT and/or BAT guidelines, no immediate action is needed. The permit should be reissued upon expiration to reflect the guidelines except where prohibited by anti-backsliding.

4.a.2. For non-complying facilities

If assessment indicates certain facilities are currently discharging pollutants at levels that would exceed the new BPT and/or BAT guidelines, the permitting authority should provide the results of the compliance assessment to these facilities and notify them that immediate compliance is expected upon permit reissuance.

In either case, permits will be reissued upon expiration and immediate compliance with the permit limits will be expected upon reissuance. If discharges are not in compliance with the permit limits by the effective date of the reissued permit, civil penalties against the discharging facilities should be considered. Technical details on preparation, negotiation, and trial of actions for the recovery of administrative penalties are contained in a series of guidances transmitted to the Regions in a memo, "Guidance Documents and Delegations for Implementation of Administrative Penalty Authorities Contained in 1987 Clean Water Act Amendments", on August 28, 1987.

4.b. Permit with Reopener Clause or State General Authority to Reopen Permits upon Promulgation of New Guidelines

If a permitting authority has authority to reopen the permit, but does not have sufficient resources to reopen all the permits, a compliance assessment must be conducted (see Step 3.b). Based on the results of the compliance assessment, one of the following steps should be taken:

4.b.1. For complying facilities

For those facilities which discharge at levels below the new BPT and/or BAT guidelines, reissue the permit upon permit expiration.

4.b.2. For non-complying facilities

For those facilities currently discharging pollutants at levels that would exceed the new BPT and/or BAT guidelines, follow the procedures in Section 5.

SECTION 5. IDENTIFICATION OF NEAR-COASTAL DISCHARGERS

Near-coastal waters are the base of the whole ecological systems that we depend upon for much of our sustenance. In recent years, degradation of the near-coastal waters has become a critical national problem. The Agency has initiated a strategic plan to maintain and, where possible, enhance near-coastal water quality. Industrial point-source discharges has been identified by the Agency's coastal Regions as one of the major land and water activities contributing to the degradations in their near-coastal waters.

As part of the integrated national strategy to clean up coastal waters as well as to take an definitive action to implement the Agency's Near-Coastal Program and National Estuary Program, we urge the permitting authorities to consider discharges into near-coastal waters as the highest priority for the reissuance of OCPSF permits. [For the purpose of this strategy, the term "near-coastal waters" include the inland waters to the head of tide, the territorial seas, and the contiguous ocean. The term also includes Great Lakes and areas of greater distance where necessary to protect coastal barrier islands and the mouths of certain estuaries.]

If reopener clause is in the permit or the State has regulation to provide authority to reopen permits upon promulgation of new guidelines but the facility currently discharges pollutants at levels that would exceed the new BPT and/or BAT guidelines ("non-complying facility"), the permitting authority must examine whether the facility discharges to a near-coastal water.

If a non-complying facility discharges to a near-coastal water, its permit must be reissued before expiration. The compliance deadline in the permit may be established up to March 31, 1989. If the permittee cannot comply with the new permit limits by March 31, 1989, an administrative compliance order (AO) may be issued to establish a compliance schedule as expeditiously as practicable, but no later than three years beyond the effective date of the reissued permit. The AO normally would be prepared and publicly noticed simultaneously with the draft permit.

SECTION 6. DETERMINATION OF PRIORITY FOR PERMIT REISSUANCE IF PERMITTING AUTHORITY HAS AUTHORITY TO REOPEN THE PERMIT

For the rest of the facilities which are currently discharging pollutants at levels that would exceed the new BPT and/or BAT guidelines, but do not discharge into a near-coastal water, the permitting authority is expected to establish a schedule to reopen the permits based on the following priority factors:

6.a. Does the facility discharge into a water listed under §304(l)(1)(A)(ii) (also known as the "Long List")?

For the non-complying facilities listed on the Long List, the permitting authority should consider immediate reissuance of the permit before the permit expires.

6.b. Does the facility frequently discharge pollutants at levels significantly higher than the new guidelines?

For the purpose of assessing guideline compliance in this strategy, the definitions of "frequently" and "significantly" are recommended as follows:

6.b.1. "Frequently" means situations where analysis results of more than one third of the samples exceed the guideline's limits (either daily maximum or monthly average) for any BPT or BAT pollutant.

Example 1: Five monthly DMR reports during 1987 showed that TSS monthly average loadings exceeded 3,000 lbs/day. The guideline's monthly average limit is 2,000 lbs/day. Therefore, since more than one third (would be four out of twelve reports) of the samples exceed the guideline's limit, this situation would fall into the "frequently" category.

Example 2: In cases where only one grab sample is reported by the facility, and the phenol level exceeds the guideline's daily maximum limit of 0.026 mg/L, (e.g., the analysis shows the phenol level to be 0.040 mg/L), then the term "frequently" applies.

6.b.2. "Significantly" when applied to BPT pollutants means that the discharge level is more than 40% higher than the guideline's limit (either daily maximum or monthly average).

> Example: A facility discharges a monthly average BOD5 of 1,500 lbs/day. The guideline's monthly average limit is 1,000 lbs/day. In this case, the BOD5 level is "significantly" higher than the guideline's limit.

6.b.3. "Significantly" when applied to BAT pollutants means that the discharge level is more than 20% higher than the guideline's limit (either daily maximum or monthly average).

> Example: A facility discharges a daily maximum total cyanide of 8.0 lbs/day. The guideline's daily maximum limit is 6.0 lbs/day. In this case, the total cyanide level is "significantly" higher than the guideline's limit.

The non-expiring permits for the facilities which "frequently" discharge "significantly" higher levels of pollutants should be reissued under a higher priority.

6.c. Are the pollutants exceeding the new guidelines mostly toxics?

If they are, the reissuance priority should be higher as the number of toxic pollutants which exceed the guideline's limits increases. For example, a facility discharging chlorobenzene and total cyanide at levels higher than the guidelines should have its permit reissued before reissuing a permit for another facility which has higher TSS levels than the guidelines.

6.d. Has the discharger been designated as a major facility?

The "major" industrial facilities were classified by the Agency for the purpose of resource allocation and commitment tracking. The major facilities are assumed to have a potentially more significant impact on the environment and therefore should have a higher priority for permit reissuance.

6.e. How good are the data used to assess compliance? Are they reliable?

The permitting authority should use its own judgment to determine the quality of the data used in this assessment. Factors to consider are: How old are the analyses? How low are the detection limits? Where were the samples taken (i.e., before or after mixing with the non-process flow)? etc. Note: The less reliable the data are, the higher the priority of permit reissuance should be.

6.f. Does the permit expire after October 1, 1991?

For those facilities which are currently discharging pollutants at levels that would exceed the new guidelines, and which will expire after October 1, 1991, we recommend earlier permit reissuance.

6.g. Are there other factors which need to be considered by the permitting authority?

If there are, they should also be considered in prioritizing the reissuance schedule.

SECTION 7. REISSUANCE OF PERMITS

Based on the priority factors described in Section 6, two options are left to the discretion of the permitting authority as follows:

7.a. Permits determined to be reopened on a higher priority

Permitting authorities should reopen permits before permits expire. The compliance deadline in the permit may be established up to March 31, 1989. If the permittee cannot comply with the new permit limits by March 31, 1989, an administrative compliance order (AO) may be issued to establish a compliance schedule as expeditiously as practicable, but no later than three years beyond the effective date of the reissued permit. The AO normally would be prepared and publicly noticed simultaneously with the draft permit.

7.b. Permits determined not to be reopened prior to the expiration date

Since compliance assessment has indicated that these facilities are currently discharging pollutants at levels that would exceed the new BPT and/or BAT guidelines, the

permitting authority must use letters to request submission of compliance plans from the permittees. A sample information request letter for this purpose is provided as Option 2 in Attachment D. The permitting authority must also notify these facilities that immediate compliance is expected upon permit reissuance.

Permits which fall in this group will be reissued upon expiration and immediate compliance with the permit limits will be expected upon reissuance. If discharges are not in compliance with the permit limits by the effective date of the reissued permit, civil penalties against the discharging facilities should be considered. Technical details on preparation, negotiation, and trial of actions for the recovery of administrative penalties are contained in a series of guidances transmitted to the Regions in a memo, "Guidance Documents and Delegations for Implementation of Administrative Penalty Authorities Contained in 1987 Clean Water Act Amendments", on August 28, 1987.

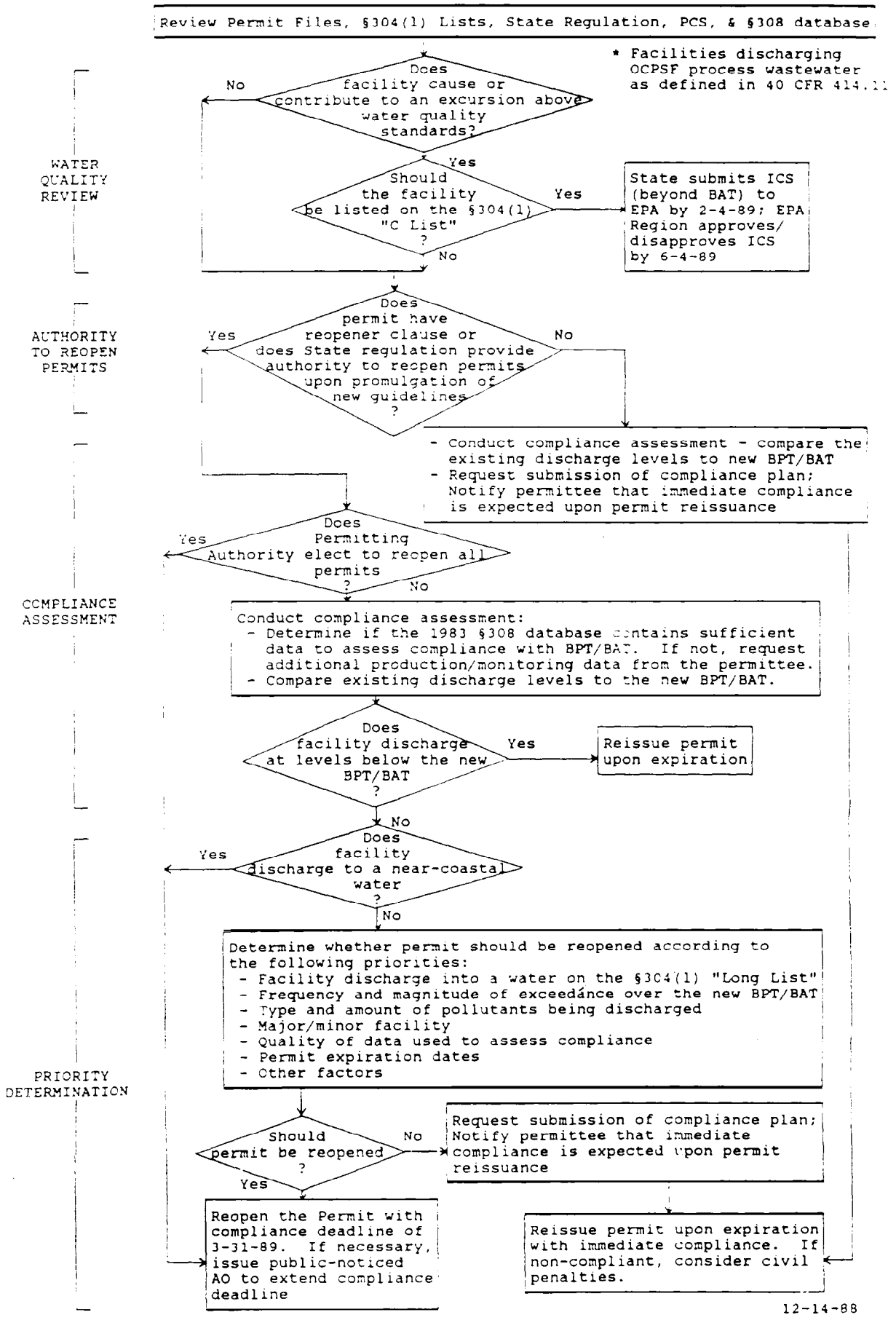
ATTACHMENT A

FLOW CHART OF THE NPDES PERMITTING STRATEGY FOR OCPSF

INDUSTRY DIRECT DISCHARGE PERMITS* EXPIRING AFTER FY-89

* NPDES permits for facilities discharging OCPSF process wastewater as defined in 40 CFR 414.11

FLOW CHART OF THE NPDES PERMITTING STRATEGY FOR OCPSF INDUSTRY DIRECT DISCHARGERS* EXPIRING AFTER OCTOBER 1, 1989



ATTACHMENT B

LIST OF KNOWN ACTIVE OCPSF DIRECT DISCHARGERS BY REGION

Total known OCPSF facilities = 417

The following NPDES facilities were retrieved from PCS record based on the following criteria: (1) facilities which responded to the 1983 survey and still discharge actively; and (2) major facilities which have SIC codes of 2821, 2823, 2824, 2865, and 2869.

> Each permitting authority must review the discharge status of these facilities. Delete from the list any facility which does not currently discharge OCPSF process wastewater (as defined in 40 CFR 414.11) and/or add to the list any additional OCPSF facilities, then submit the amended list to EPA, Office of Water Enforcement and Permits (OWEP), Permits Division, 401 M Street, S.W., Washington D.C. 20460 by March 10, 1989.

NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION I	(total = 19)					
	(CT = 6)					
CT0000086	AMERICAN CYANAMIDE COMPANY	M	121283	121288	2821	PLASTICS MATERIALS AND RESINS
CT0001341	UPJOHN COMPANY	M	110981	073086	2869	INDUST. ORGANIC CHEMICALS, NEC
CT0001678	BELDING CHEMICAL INDUSTRIES		123174	123179	2821	PLASTICS MATERIALS AND RESINS
CT0001881	RAYMARK CORPORATION		121079	121084	3292	ASBESTOS PRODUCTS
CT0003131	DOW CHEMICAL-ALLYNS POINT	M	060484	060489	2819	INDUSTRIAL INORGANIC CHEMICALS
CT0003891	HUMPHREY CHEMICAL CO		122374	122379	2869	INDUST. ORGANIC CHEMICALS, NEC
	(MA = 9)					
MA0000442	POLYSAR_INC.	M	100184	100189	2821	PLASTICS MATERIALS AND RESINS
MA0000884	PLYMOUTH RUBBER COMPANY INC	M	091884	091889	2821	PLASTICS MATERIALS AND RESINS
MA0001180	BOSTIC CHEMICAL GROUP EMHART C	M	062984	062989	2821	PLASTICS MATERIALS AND RESINS
MA0002071	TUCKER COSCO	M	051187	051192	2821	PLASTICS MATERIALS AND RESINS
MA0002275	BLANE POLYMERS-VISTA CHEMICAL	M	061984	061989	2821	PLASTICS MATERIALS AND RESINS
MA0004529	GENERAL LATEX & CHEMICAL CORP	M	062984	062989	2821	PLASTICS MATERIALS AND RESINS
MA0005291	I. C. I. AMERICAS, INC.	M	093087	093092	2865	CYCLIC CRUDES AND INTERMEDIATE
MA0005304	OLIN CHEMICAL	M	030987	030992	2869	INDUST. ORGANIC CHEMICALS, NEC
MA0024686	ADVANCE COATINGS CO	M	032985	032990	2821	PLASTICS MATERIALS AND RESINS

* = Major (M) or Minor (blank) facility
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LIST OF KNOWN OCPSF ACTIVE DIRECT DISCHARGERS BY REGION (CONTINUED)

NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION I (continued)						
	(NH = 2)					
NH0000591	W.R. GRACE	M	123185	013091	2879	AGRICULTURAL CHEMICALS, NEC
NH0001091	K.J. QUINN & COMPANY, INC.	M	082784	082789	2821	PLASTICS MATERIALS AND RESINS
	(RI = 2)					
RI0000043	BRADFORD DYEING	M	093083	093086	2869	INDUST. ORGANIC CHEMICALS, NEC
RI0000132	AMERICAN HOECHST CORP.	M	033082	033087	2865	CYCLIC CRUDES AND INTERMEDIATE
REGION II	(total = 56)					
	(NJ = 33)					
NJ0000019	GAF CHEMICALS CORPORATION	M	123085	013191	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0000116	NUODEX INC	M	031585	043090	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0000124	KALAMA CHEMICAL INC	M	111584	123189	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0001058	AMERICAN CYANAMID COMPANY	M	090684	110189	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0001147	SANDOZ CHEMICALS CORP	M	052286	063091	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0001651	FRITZSCHE DODGE & OLCOTT		093086	113091	2087	FLAVORING EXTRACTS AND SIRUPS
NJ0002798	HENKEL CORPORATION	M	121583	011589	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0003018	KENRICH PETROCHEMICALS INC	M	062287	073192	2821	PLASTICS MATERIALS AND RESINS
NJ0003166	ALLIED CORPORATION	M	101884	113089	2819	INDUSTRIAL INORGANIC CHEMICALS
NJ0003182	STEPAN CHEMICAL CO	M	110185	103190	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0003506	ADRON	M	022586	033191	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0003697	COLLOID CHEMICAL INC	M	011487	022892	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0004120	CIBA-GEIGY CORP	M	050885	063090	2821	PLASTICS MATERIALS AND RESINS
NJ0004219	E I DUPONT DE NEMOURS	M	070583	083188	2865	CYCLIC CRUDES AND INTERMEDIATE
NJ0004235	OCCIDENTAL CHEMICAL CORP	M	122184	013190	2821	PLASTICS MATERIALS AND RESINS
NJ0004278	AIR PRODUCTS & CHEMICALS INC	M	083085	093090	2819	INDUSTRIAL INORGANIC CHEMICALS
NJ0004286	B.F. GOODRICH CO.	M	010885	022890	2821	PLASTICS MATERIALS AND RESINS
NJ0004391	OCCIDENTAL CHEMICAL CORP.	M	100984	113089	2821	PLASTICS MATERIALS AND RESINS
NJ0005045	MONSTANTO COMPANY	M	030785	043090	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0005100	E I DUPONT DE NEMOURS	M	080187	083192	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0005134	HERCULES INCORPORATED	M	061085	073190	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0005142	HERCULES INCORPORATED	M	081585	093090	2865	CYCLIC CRUDES AND INTERMEDIATE
NJ0005291	SOUTHLAND CORP	M	071587	083190	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0005509	SYBRON CHEMICALS INC	M	011785	022890	2821	PLASTICS MATERIALS AND RESINS
NJ0005754	TECHNICAL OIL PRODUCTS CO INC	M	040786	053186	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0020478	PANTASOTE COMPANY OF NEW YORK	M	110183	113088	2821	PLASTICS MATERIALS AND RESINS
NJ0029483	WITCO CHEMICAL CORP	M	121583	011489	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0030970	ARSYNCO INC	M	031485	031489	2824	ORGANIC FIBERS, NONCELLULOSIC
NJ0032662	DARTCO MANUFACTURING	M	123185	013191	2865	CYCLIC CRUDES AND INTERMEDIATE
NJ0033545	RBH DISPERSIONS	M	040186	033191	2865	CYCLIC CRUDES AND INTERMEDIATE
NJ0034428	SPECIALTY TONER CORPORATION	M	080885	093090	2865	CYCLIC CRUDES AND INTERMEDIATE
NJ0034444	UNGERER & CO.	M	123085	013191	2869	INDUST. ORGANIC CHEMICALS, NEC
NJ0034720	JVEX CORP	M	051587	063092	2821	PLASTICS MATERIALS AND RESINS

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NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION II (continued)						
	(NY = 18)					
NY0000345	FMC CORPORATION	M	052285	070190	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0001198	DUREZ RESINS & MOLDING PRODS.	M	082887	100192	2821	PLASTICS MATERIALS AND RESINS
NY0001406	EVANS CHEMETICS DIVISION	M	090886	100191	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0001635	OLIN CORP-NIAGARA FALLS PLANT	M	041988	060193	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0001643	EASTMAN KODAK CO KODAK PARK DI	M	100184	110189	3999	MANUFACTURING INDUSTRIES, NEC
NY0002470	BUFFALO COLOR CORP	M	093087	110192	2865	CYCLIC CRUDES AND INTERMEDIATE
NY0003328	E.I. DUPONT DE NEMOURS	M	030183	040188	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0003336	OCCIDENTAL CHEMICAL-E.D.S, PRO	M	082184	092189	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0005801	SCHENECTADY CHEMICALS, INC.	M	040287	050192	2821	PLASTICS MATERIALS AND RESINS
NY0006050	SCOTT PAPER COMPANY	M	040185	050190	2621	PAPER MILLS EXC BUILDING PAPER
NY0006076	STONEY POINT TECHNICAL PARK	M	022186	040191	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0006670	NEPERA CHEMICAL CORP	M	060184	063089	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0007072	G.E. - PLASTICS DIVISION	M	040180	033181	2821	PLASTICS MATERIALS AND RESINS
NY0008605	SILICONE PRODUCTS DIVISION	M	111687	010193	2821	PLASTICS MATERIALS AND RESINS
NY0024392	SCHENECTADY CHEMICALS RESEARCH	M	013186	030191	2821	PLASTICS MATERIALS AND RESINS
NY0068225	PENNWALT CORP - LUCIDOL DIV	M	120184	010190	2869	INDUST. ORGANIC CHEMICALS, NEC
NY0105937	AMPACET CORP	M	050182	060187	2865	CYCLIC CRUDES AND INTERMEDIATE
NY0107166	DIAZ CHEMICAL CORP		110184	120189	2869	INDUST. ORGANIC CHEMICALS, NEC
	(PR = 5)					
PR0000086	DEMACO CORP.	M	022586	033191	2869	INDUST. ORGANIC CHEMICALS, NEC
PR0000418	UNION CARBIDE CARIBE INC	M	113074	123179	2869	INDUST. ORGANIC CHEMICALS, NEC
PR0020991	OXOCHEM ENTERPRICE	M	113076	123181	2869	INDUST. ORGANIC CHEMICALS, NEC
PR0023281	SAFETY KLEEN ENVIROSYSTEMS CO	M	032587	053192	2869	INDUST. ORGANIC CHEMICALS, NEC
PR0023574	VINELAND CHEMICAL CO OF PR	M	083080	093085	2869	INDUST. ORGANIC CHEMICALS, NEC
REGION III (total = 58)						
	(DE = 6)					
DE0000035	DUPONT DENEMOURS & CO. INC-SEA	M	050583	050488	2821	PLASTICS MATERIALS AND RESINS
DE0000272	AKZO CHEMICAL INC.	M	040583	040488	2812	ALKALIES AND CHLORINE
DE0000612	FORMOSA PLASTICS CORPORATION U	M	101783	101688	2821	PLASTICS MATERIALS AND RESINS
DE0000621	ICI AMERICA INC.-ATLAS POINT	M	110884	110789	2869	INDUST. ORGANIC CHEMICALS, NEC
DE0000647	GEORGIA-GULF CORPORATION	M	092385	092290	2821	PLASTICS MATERIALS AND RESINS
DE0020001	STD. CHLORINE OF DELAWARE	M	051084	050989	2865	CYCLIC CRUDES AND INTERMEDIATE
	(MD = 6)					
MD0000299	FMC CORPORATION	M	052287	052292	2869	INDUST. ORGANIC CHEMICALS, NEC
MD0000345	NUODEX INC.	M	021188	021193	2869	INDUST. ORGANIC CHEMICALS, NEC
MD0000540	VISTA CHEMICAL COMPANY		042888	042893	2869	INDUST. ORGANIC CHEMICALS, NEC
MD0002003	NEVAMAR CORP	M	072386	072291	2824	ORGANIC FIBERS, NONCELLULOSIC
MD0003387	SPECTRON, INC.	M	042983	042988	2869	INDUST. ORGANIC CHEMICALS, NEC
MD0056332	ESSEX INDUSTRIAL CHEMICALS INC	M	100185	100190	2869	INDUST. ORGANIC CHEMICALS, NEC

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REGION III (continued)						
	(PA = 11)					
PA0000507	HERCULES INCORPORATED - JEFFER	M	092587	092592	2821	PLASTICS MATERIALS AND RESINS
PA0001970	KOPPERS OIL CITY PLANT	M	032985	032890	2821	PLASTICS MATERIALS AND RESINS
PA0001988	KOPPERS CO PETROLIA PA	M	111887	111792	2865	CYCLIC CRUDES AND INTERMEDIATE
PA0004979	NEVILLE CHEMICAL COMPANY	M	093085	093090	2821	PLASTICS MATERIALS AND RESINS
PA0006254	ARCO CHEMICAL COMPANY - BEAVER	M	042886	042891	2821	PLASTICS MATERIALS AND RESINS
PA0006394	RIDGWAY COLOR & CHEMICAL	M	093085	092990	2819	INDUSTRIAL INORGANIC CHEMICALS
PA0012769	ROHM & HAAS-DELAWARE VLY INC.	M	093086	093091	2821	PLASTICS MATERIALS AND RESINS
PA0012777	ROHM & HAAS CO PHILA PLANT	M	093085	093090	2869	INDUST. ORGANIC CHEMICALS, NEC
PA0022047	CROMPTON & KNOWLES CORPORATION	M	092785	092790	2865	CYCLIC CRUDES AND INTERMEDIATE
PA0070505	IMC CHEMICAL GROUP	M	091886	091891	2869	INDUST. ORGANIC CHEMICALS, NEC
PA0091391	POLYCOM HUNTSMAN	M	093085	093090	2821	PLASTICS MATERIALS AND RESINS
	(VA = 14)					
VA0000299	CELANESE CORP, NARROWS	M	041687	041692	2821	PLASTICS MATERIALS AND RESINS
VA0001074	MOBAY-DAMASCUS	M	110784	110789	2869	INDUST. ORGANIC CHEMICALS, NEC
VA0001601	DUPONT MARTINSVILLE	M	111486	111491	2282	THROWING AND WINDING MILLS
VA0001856	WAYNE TEX, INC.	M	100786	100791	2297	NONWOVEN FABRICS
VA0002160	DUPONT WAYNESBORO	M	101786	101791	2821	PLASTICS MATERIALS AND RESINS
VA0002208	AVTEX FIBERS INC, FRONT ROYAL	M	100786	100791	2823	CELLULOSIC MAN-MADE FIBERS
VA0003077	ICI AMERICA CORP-HOPEWELL PLT	M	111486	111491	2821	PLASTICS MATERIALS AND RESINS
VA0003433	HERCULES INC-FRANKLIN PLANT	M	091685	091690	2869	INDUST. ORGANIC CHEMICALS, NEC
VA0003450	HERCULES INC-COVINGTON PLANT	M	110885	110890	2824	ORGANIC FIBERS, NONCELLULOSIC
VA0003654	BASF CORP. - FIBERS DIV	M	093086	093091	2824	ORGANIC FIBERS, NONCELLULOSIC
VA0004669	DUPONT SPRUANCE	M	093086	093091	2821	PLASTICS MATERIALS AND RESINS
VA0004782	WRIGHT CHEMICAL CORP WAVERLY	M	052086	052091	2891	ADHESIVES AND SEALANTS
VA0005291	ALLIED CHEM CORP, HOPEWELL	M	120186	120191	2869	INDUST. ORGANIC CHEMICALS, NEC
VA0005312	ALLIED CHEM CORP-CHESTERFIELD	M	093086	093091	2824	ORGANIC FIBERS, NONCELLULOSIC
	(WV = 21)					
WV0000078	UNION CARBIDE CORPORATION	M	061484	061389	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0000086	RHONE-POULENC AG COMPANY	M	121787	121692	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0000094	UNION CARBIDE CORPORATION	M	100485	100390	2821	PLASTICS MATERIALS AND RESINS
WV0000132	GOODYEAR TIRE & RUBBER COMPANY	M	093086	092991	2821	PLASTICS MATERIALS AND RESINS
WV0000400	FMC CORPORATION	M	062587	062492	2819	INDUSTRIAL INORGANIC CHEMICALS
WV0000787	AMERICAN CYANAMID COMPANY	M	060585	060490	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0000841	BORG WARNER CHEMICALS, INC.	M	063087	062992	2821	PLASTICS MATERIALS AND RESINS
WV0000868	MONSANTO COMPANY	M	031186	031191	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0001112	USS CHEMICALS	M	111986	111891	2821	PLASTICS MATERIALS AND RESINS
WV0001279	E.I.DU PONT DE NEMOURS & CO.	M	092587	092592	2821	PLASTICS MATERIALS AND RESINS
WV0001651	C.S.T., INCORPORATED	M	030582	030587	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0001708	MASON DIXON TANK LINES	M	031386	031291	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0002313	OCCIDENTAL ELECTROCHEMICALS	M	012786	012691	2869	INDUST. ORGANIC CHEMICALS, NEC

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REGION III (continued)						
WV0002399	E. I. DUPONT	M	051887	051892	2873	NITROGENOUS FERTILIZERS
WV0002496	AKZO CHEMICAL INC.	M	103086	102991	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0004359	P.P.G. INDUSTRIES, INC.	M	123075	013080	2812	ALKALIES AND CHLORINE
WV0004413	OLIN CORPORATION	M	123184	123089	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0004588	KOPPERS COMPANY, INC.	M	121687	121592	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0004740	WESTON CHEMICAL COMPANY INC	M	111381	121386	2869	INDUST. ORGANIC CHEMICALS, NEC
WV0005169	MOBAY CHEMICAL CORPORATION	M	072485	072390	2821	PLASTICS MATERIALS AND RESINS
WV0022047	BORG-WARNER CHEMICALS, INC.	M	072887	072792	2865	CYCLIC CRUDES AND INTERMEDIATE
REGION IV (total = 94)						
	(AL = 15)					
AL0000108	AMOCO CHEM-DECATUR PLT	M	040888	041493	2869	INDUST. ORGANIC CHEMICALS, NEC
AL0000116	MONSANTO TEXTILES CO	M	123185	010391	2824	ORGANIC FIBERS, NONCELLULOSIC
AL0000205	3M CO-DECATUR PLT	M	060185	060190	2821	PLASTICS MATERIALS AND RESINS
AL0001597	DUPONT-MOBILE PLANT	M	091087	091492	2879	AGRICULTURAL CHEMICALS, NEC
AL0001961	AKZO CHEMICAL, INC.	M	090486	090491	2812	ALKALIES AND CHLORINE
AL0002097	ALLIED CORP-FAIRFIELD TAR PLT	M	101582	103187	2865	CYCLIC CRUDES AND INTERMEDIATE
AL0002801	SCOTT PAPER MOBILE MILL MOBILE	M	071583	073188	2621	PAPER MILLS EXC BUILDING PAPER
AL0003026	COURTAULDS NO AMERICA MOBILE	M	060383	063088	2823	CELLULOSIC MAN-MADE FIBERS
AL0003085	VIRGINIA CHEMICALS		42887	043092	2819	INDUSTRIAL INORGANIC CHEMICALS
AL0003093	CIBA GEIGY CORP.	M	071587	072092	2869	INDUST. ORGANIC CHEMICALS, NEC
AL0003221	KOPPERS-WOODWARD ORGANICS	M	090286	090291	2869	INDUST. ORGANIC CHEMICALS, NEC
AL0003247	SLOSS	M	070276	033179	3312	BLAST FURNACES AND STEEL MILLS
AL0023272	DEGUSSA CORP.-AL GROUP	M	091087	090992	2879	AGRICULTURAL CHEMICALS, NEC
AL0026921	LAWTER INTERNATIONAL-SOUTH RES	M	051287	051592	2821	PLASTICS MATERIALS AND RESINS
AL0042447	M&T CHEMICALS, INC	M	091086	091291	2869	INDUST. ORGANIC CHEMICALS, NEC
	(FL = 9)					
FL0000060	REICHHOLD CHEM JAX	M	030984	033189	2821	PLASTICS MATERIALS AND RESINS
FL0000884	PLYMOUTH RUBBER COMPANY INC	M	091884	091889	2821	PLASTICS MATERIALS AND RESINS
FL0001040	UNION CAMP CORPORATION	M	063088	063088	2869	INDUST. ORGANIC CHEMICALS, NEC
FL0002313	AIR PROD & CHEM ESCAM PENSACOL	M	092183	110188	2869	INDUST. ORGANIC CHEMICALS, NEC
FL0002488	MONSANTO CORP	M	050983	060988	2869	INDUST. ORGANIC CHEMICALS, NEC
FL0002593	AMERICAN CYANAMID	M	041383	051388	2824	ORGANIC FIBERS, NONCELLULOSIC
FL0004936	DUPONT DE NEMOURS & CO	M	081084	050189	2869	INDUST. ORGANIC CHEMICALS, NEC
FL0029653	ALPHA CHEM CORP	M	100686	103191	2821	PLASTICS MATERIALS AND RESINS
FL0038300	WESTVACO CORP-ST JOHN'S DEPT	M	092884	103189	2821	PLASTICS MATERIALS AND RESINS
	(GA = 4)					
GA0000051	REICHHOLD CHEMICALS, INC.	M	110987	110192	2821	PLASTICS MATERIALS AND RESINS
GA0001708	HENKEL CORPORATION	M	120287	120192	2869	INDUST. ORGANIC CHEMICALS, NEC
GA0002160	DSM CHEMICALS AUGUSTA, INC	M	120487	120192	2869	INDUST. ORGANIC CHEMICALS, NEC
GA0026867	KATALISTICS		111387	110192	2899	CHEMICAL PREPARATIONS, NEC

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REGION IV (continued)						
	(KY = 17)					
KY0000361	CLOPAY CORP PLASTIC FILM DIV	M	031788	041593	2821	PLASTICS MATERIALS AND RESINS
KY0000493	DU PONT WURTLAND PLT	M	011083	020988	2821	PLASTICS MATERIALS AND RESINS
KY0001112	BORDEN CHEM LOUISVILLE	M	052483	062188	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0001279	DOW CORNING CARROLLTON	M	041283	051188	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0001431	M & T CHEM CARROLLTON	M	093085	102990	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0001457	B F GOODRICH CHEM LOUISVILLE	M	082283	092188	2821	PLASTICS MATERIALS AND RESINS
KY0001953	W R GRACE OWENSBORO	M	092685	102590	2821	PLASTICS MATERIALS AND RESINS
KY0002119	OLIN CORP BRANDENBURG	M	042088	053193	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0002305	ROHM & HAAS KY INCORPORATED		033083	042988	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0003433	VANDERBILT CHEMICAL		082787	092592	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0003484	B F GOODRICH CHEM CALVERT CY	M	060183	063088	2812	ALKALIES AND CHLORINE
KY0003514	AIR PRODS & CHEM-CALVERT CITY	M	030183	022888	2821	PLASTICS MATERIALS AND RESINS
KY0003603	PENNWALT CORP CALVERT CITY	M	032883	042788	2812	ALKALIES AND CHLORINE
KY0003701	GAF CHEMICALS CORPORATION	M	061083	070988	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0024643	CUSTOM RESINS DIVISION	M	061083	070988	2821	PLASTICS MATERIALS AND RESINS
KY0064645	KY AGRICULTURAL ENERGY CORP	M	091484	101289	2869	INDUST. ORGANIC CHEMICALS, NEC
KY0082571	UNISON TRANSFORMER SERVICE	M	080886	090691	2869	INDUST. ORGANIC CHEMICALS, NEC
	(MS = 6)					
MS0001520	REICHHOLD CHEM GULFPORT INDUS	M	090184	063089	2821	PLASTICS MATERIALS AND RESINS
MS0001791	FIRST CHEM CORP PASCAGOULA	M	100286	093091	2865	CYCLIC CRUDES AND INTERMEDIATE
MS0001830	HERCULES INC.	M	092986	092891	2861	GUM AND WOOD CHEMICALS
MS0001970	VISTA POLYMERS INC	M	050986	033191	2821	PLASTICS MATERIALS AND RESINS
MS0027995	CEDAR CHEMICAL CORPORATION	M	100686	063091	2865	CYCLIC CRUDES AND INTERMEDIATE
MS0029190	SYLVACHEM CORP.	M	070585	063090	2869	INDUST. ORGANIC CHEMICALS, NEC
	(NC = 9)					
NC0000299	BASF FIBERS-BASF CORPORATIONL		040185	033190	2823	CELLULOSIC MAN-MADE FIBERS
NC0000663	E. I. DUPONT, WILMINGTON		010186	123190	2821	PLASTICS MATERIALS AND RESINS
NC0001112	CAPE INDUSTRIES		010588	063091	2869	INDUST. ORGANIC CHEMICALS, NEC
NC0003573	E. I. DUPONT, FAYETTEVILLE		031387	083190	2821	PLASTICS MATERIALS AND RESINS
NC0003760	E. I. DUPONT, KINSTON		050185	043090	2824	ORGANIC FIBERS, NONCELLULOSIC
NC0004375	SANDOZ CHEMICALS CORPORATION		030483	031088	2869	INDUST. ORGANIC CHEMICALS, NEC
NC0004944	CELANESE FIBERS - SALISBURY		060686	053191	2821	PLASTICS MATERIALS AND RESINS
NC0004952	CELANESE FIBERS OPERATION		011386	022890	2821	PLASTICS MATERIALS AND RESINS
NC0005274	CROMPTON & KNOWLES CORP-LOWELL		052987	063090	2865	CYCLIC CRUDES AND INTERMEDIATE
	(SC = 24)					
SC0000281	BASF CORPORATION/ANDERSON	M	080285	083190	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0000302	BASF CORPOR/FIBERS DIV	M	010937	013192	2282	THROWING AND WINDING MILLS
SC0000400	OWENS-CORNING FIBERGLAS	M	031585	033190	3229	PRESSED AND BLOWN GLASS, NEC
SC0000914	LOBECO PRODUCTS INC	M	052385	063090	2865	CYCLIC CRUDES AND INTERMEDIATE

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REGION IV (continued)						
SC0001180	ETHYL CORP/ORANGEBURG PLANT	M	101485	103190	2861	GUM AND WOOD CHEMICALS
SC0001333	CAROLINA EASTMAN CO	M	070887	073192	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0001783	CELANESE FIBERS/CELRIVER PLANT	M	082586	093091	2823	CELLULOSIC MAN-MADE FIBERS
SC0001791	HOECHST CELANESE CORPORATION	M	103086	113091	2821	PLASTICS MATERIALS AND RESINS
SC0002305	CELANESE FIBERS/GREENVILLE PLT	M	020384	022889	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0002321	ABCO INDUSTRIES INC	M	090685	093090	2869	INDUST. ORGANIC CHEMICALS, NEC
SC0002585	DU PONT/MAY PLANT	M	090685	093090	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0002682	HARDWICKE CHEMICAL COMPANY	M	103086	113091	2865	CYCLIC CRUDES AND INTERMEDIATE
SC0002798	HOECHST FIBERS INC	M	051385	053090	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0002917	DU PONT/FLORENCE PLANT	M	102683	113088	2821	PLASTICS MATERIALS AND RESINS
SC0003107	PHILLIPS FIBERS CORP	M	010686	013191	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0003441	MOBAY CHEMICAL/BUSHY PARK PLT	M	010587	013192	2865	CYCLIC CRUDES AND INTERMEDIATE
SC0003492	SYBRON CHEMICALS INC	M	051184	053189	2869	INDUST. ORGANIC CHEMICALS, NEC
SC0003557	ALLIED CORP/ALLIED-SIGNAL INC	M	071384	073189	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0003581	MILLIKEN & CO/MILLIKEN CHEM	M	071384	073189	2869	INDUST. ORGANIC CHEMICALS, NEC
SC0004162	FIBER INDUSTRIES INC	M	010484	013189	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0026506	DU PONT/COOPER RIVER PLANT	M	091686	093091	2824	ORGANIC FIBERS, NONCELLULOSIC
SC0028584	AMOCO CHEMICAL CO/COOPER RIVER	M	090683	093088	2869	INDUST. ORGANIC CHEMICALS, NEC
SC0035360	R-M INDUSTRIES INC	M	110883	113088	2869	INDUST. ORGANIC CHEMICALS, NEC
SC0037826	SPECIALITY IND. PROD. INC	M	110687	113092	2869	INDUST. ORGANIC CHEMICALS, NEC
	(TN = 10)					
TN0000078	QO CHEMICALS, INC.	M	120183	113088	2869	INDUST. ORGANIC CHEMICALS, NEC
TN0000442	ALPHA RESINS CORPORATION	M	090484	090489	2821	PLASTICS MATERIALS AND RESINS
TN0002259	DUPONT OLD HICKORY	M	032985	032890	2821	PLASTICS MATERIALS AND RESINS
TN0002640	TN EASTMAN CO KINGSPORT	M	093087	092992	2821	PLASTICS MATERIALS AND RESINS
TN0002810	BASF FIBERS	M	090484	090489	2282	THROWING AND WINDING MILLS
TN0002844	DU PONT CHATTANOOGA	M	020184	013189	2821	PLASTICS MATERIALS AND RESINS
TN0003425	ICI AMERICAS, INC.	M	093087	092992	2869	INDUST. ORGANIC CHEMICALS, NEC
TN0004421	NORTH AMERICAN RAYON CORP	M	080184	073189	2823	CELLULOSIC MAN-MADE FIBERS
TN0029378	ICI AMERICAS, INC.	M	093087	092992	2869	INDUST. ORGANIC CHEMICALS, NEC
TN0040550	SYNTHETIC INDUSTRIES	M	010184	123188	2821	PLASTICS MATERIALS AND RESINS
REGION V (total = 41)						
	(IL = 16)					
IL0000035	AMOCO-WOODRIVER		092785	080190	2911	PETROLEUM REFINING
IL0000141	QUANTUM CHEMICAL CORPORATION	M	090585	080190	4941	WATER SUPPLY
IL0000621	NATIONAL STARCH AND CHEMICAL	M	031385	010190	2824	ORGANIC FIBERS, NONCELLULOSIC
IL0001350	BORDEN INC.	M	052485	040190	2824	ORGANIC FIBERS, NONCELLULOSIC
IL0001392	GOODRICH, B.F. CO.	M	052485	030190	2821	PLASTICS MATERIALS AND RESINS
IL0001619	MOBIL OIL-JOLIET STY	M	090385	080190	2821	PLASTICS MATERIALS AND RESINS

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LIST OF KNOWN OCPSF ACTIVE DIRECT DISCHARGERS BY REGION (CONTINUED)

NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION V (continued)						
IL0001627	AMOCO CHEMICALS CO WILLOW SP	M	020884	091588	2821	PLASTICS MATERIALS AND RESINS
IL0001643	AMOCO CHEMICALS CO - JOLIET	M	093086	090190	2869	INDUST. ORGANIC CHEMICALS, NEC
IL0001929	BORG-WARNER CHEMICALS, INC.	M	012585	100189	2821	PLASTICS MATERIALS AND RESINS
IL0002453	STEPAN CHEMICAL CO.	M	062885	060190	2843	SURFACE ACTIVE AGENTS
IL0002917	QUANTUM CHEMICAL	M	072985	070190	2818	
IL0003140	MINN MINING & MFG. CO.	M	071084	070189	2821	PLASTICS MATERIALS AND RESINS
IL0003191	PIERCE CHEMICAL CO.		083085	070190	2834	PHARMACEUTICAL PREPARATIONS
IL0005151	PHILLIPS JOANNA, DIV OR JOANNA	M	112883	090188	2821	PLASTICS MATERIALS AND RESINS
IL0026069	AKZO CHEMIE AMERICA-MORRIS PLA	M	032885	120189	2869	INDUST. ORGANIC CHEMICALS, NEC
IL0034622	REICHOLD CHEMICALS INC.	M	012986	120190	2822	SYNTHETIC RUBBER
	(IN = 3)					
IN0000736	UNIROYAL PLASTICS COMPANY, INC	M	093085	083190	2821	PLASTICS MATERIALS AND RESINS
IN0002101	GENERAL ELECTRIC CO.	M	093085	083190	2821	PLASTICS MATERIALS AND RESINS
IN0002861	ELI LILLY AND CO.	M	093087	093092	2833	MEDICINALS AND BOTANICALS
	(MI = 6)					
MI0000540	BASF-WYANDOTTE	M	091986	100187	2821	PLASTICS MATERIALS AND RESINS
MI0000761	BASF-HOLLAND	M	120182	083187	2865	CYCLIC CRUDES AND INTERMEDIATE
MI0000868	DOW CHEM USA-MIDLAND	M	051784	063088	2821	PLASTICS MATERIALS AND RESINS
MI0000884	DUPONT-MONTAGUE	M	082586	100188	2822	SYNTHETIC RUBBER
MI0002381	PENNWALT CORPORATION	M	091986	100187	2819	INDUSTRIAL INORGANIC CHEMICALS
MI0026034	WACKER SILICONES CORPORATION	M	091986	100189	2821	PLASTICS MATERIALS AND RESINS
	(OH = 16)					
OH0002283	DIVERSITECH GENERAL INC	M	082384	082089	2821	PLASTICS MATERIALS AND RESINS
OH0002615	BP CHEMICALS AMERICA, INC	M	092785	092487	2869	INDUST. ORGANIC CHEMICALS, NEC
OH0004006	ELKEM METALS COMPANY	M	062681	063082	3313	ELECTROMETALLURGICAL PRODUCTS
OH0004251	PPG INDUSTRIES,INC.	M	032985	032688	2821	PLASTICS MATERIALS AND RESINS
OH0005177	PPG INDUSTRIES, INC.	M	072385	072090	2812	ALKALIES AND CHLORINE
OH0006327	E I DUPONT DENEMOURS CO	M	071786	082789	2821	PLASTICS MATERIALS AND RESINS
OH0006769	OCCIDENTAL CHEMICAL	M	093086	092788	2821	PLASTICS MATERIALS AND RESINS
OH0007030	SHELL OIL COMPANY	M	122383	122088	2821	PLASTICS MATERIALS AND RESINS
OH0007196	UNION-CAMP CORPORATION	M	122383	122088	2899	CHEMICAL PREPARATIONS, NEC
OH0007269	DOVER CHEMICAL	M	050885	050590	2869	INDUST. ORGANIC CHEMICALS, NEC
OH0007391	ARISTECH CHEMICAL CO.	M	041585	041287	2865	CYCLIC CRUDES AND INTERMEDIATE
OH0007544	ALLIED CORPORATION	M	092785	092490	2865	CYCLIC CRUDES AND INTERMEDIATE
OH0009946	MONSANTO COMPANY	M	092978	033181	2821	PLASTICS MATERIALS AND RESINS
OH0063444	HUKILL CHEMICAL CORPORATION	M	050477	040381	2869	INDUST. ORGANIC CHEMICALS, NEC
OH0076392	SOUTH POINT ETHANOL	M	071483	071188	2869	INDUST. ORGANIC CHEMICALS, NEC
OH0088072	POLYSAR INC	M	092386	092088	2821	PLASTICS MATERIALS AND RESINS

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NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION VI (total = 135)						
	(AR = 5)					
AR0001236	BTL SPECIALTY RESINS CORP.	M	081586	091591	2821	PLASTICS MATERIALS AND RESINS
AR0035386	ARKANSAS EASTMAN-BATESVILLE	M	101086	111091	2869	INDUST. ORGANIC CHEMICALS, NEC
AR0037770	CHEMICAL PROCESSING & SERVICES	M	082984	082989	2869	INDUST. ORGANIC CHEMICALS, NEC
AR0037800	ENERGY SYSTEMS CO (ENSCO) EL D	M	092785	092790	2869	INDUST. ORGANIC CHEMICALS, NEC
AR0038512	VERTAC CHEMICAL-JACKSONVILLE	M	091484	101589	2865	CYCLIC CRUDES AND INTERMEDIATE
	(LA = 51)					
LA0000191	UNION CARBIDE-HAHNVILLE	M	090487	100492	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0000281	BORDEN CHEMICAL-GEISMAR	M	082184	082189	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0000493	REICHOLD CHEMICAL CO-OAKDALE	M	091481	101386	2861	GUM AND WOOD CHEMICALS
LA0000761	PPG IND-LAKE CHARLES	M	112186	123191	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0000833	AMERICAN HOECHST CORP-BATON RO	M	091484	101589	2865	CYCLIC CRUDES AND INTERMEDIATE
LA0000841	EXXON CORP-SOUTH PELTO	M	030786	040791	2821	PLASTICS MATERIALS AND RESINS
LA0000892	RUBICON CHEMICAL INC-CLARK	M	092884	102989	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0002933	VULCAN MATERIALS COMPANY-GEISM	M	092085	103190	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0002950	BASF CORPORATION-GEISMAR	M	112878	063081	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0003271	MORTON THIOKOL INC	M	092383	102388	2819	INDUSTRIAL INORGANIC CHEMICALS
LA0003301	DOW CHEMICAL CO-PLAQUEMINE	M	040387	050392	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0003336	VISTA CHEMICAL-LINEAR ALKYBEZE	M	082986	092991	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0003441	MELAMINE CHEMICAL-DONALDSONVIL	M	052584	062589	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0003689	HIMONT U.S.A. INC.	M	053086	053091	2821	PLASTICS MATERIALS AND RESINS.
LA0003751	COS-MAR PLANT (COSDEN OIL & CH	M	092383	102388	2865	CYCLIC CRUDES AND INTERMEDIATE
LA0003905	LOUISIANA CHEMICAL POLYMERS,	M	091484	111091	2821	PLASTICS MATERIALS AND RESINS
LA0004057	GRANT CHEMICAL-BATON ROUGE	M	083184	093089	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0004090	ETHYL CORP-BATON ROUGE	M	092785	092790	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0004367	AMERICAN CYANAMID-WESTWEGO	M	092785	092790	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0005266	MONSANTO OIL CO-LULING	M	031684	041689	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0005291	WITCO CHEMICAL CO-GRETNA	M	080588	080593	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0005347	OLIN CORPORATION-LAKE CHARLES	M	061287	071292	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0005355	EXXON CHEM CO-BATON ROUGE	M	042581	113086	2821	PLASTICS MATERIALS AND RESINS
LA0005401	EXXON CHEM CO-BATON ROUGE	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0005479	ALLIED-SIGNAL, INC-BATON ROUGE	M	071186	071191	2821	PLASTICS MATERIALS AND RESINS
LA0005738	CHEVRON CHEMICAL CO-BELLE CHAS	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0005754	SHELL CHEM-GEISMAR	M	070684	080689	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0005762	SHELL CHEM-NORCO	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0006009	ALLEMANIA CHEMICAL CO.	M	060388	060393	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0006149	FORMOSA PLASTICS CORP-BATON RO	M	030984	040989	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0006165	B F GOODRICH COMPANY - CHEMICA	M	092383	102388	2821	PLASTICS MATERIALS AND RESINS
LA0006181	ALLIED-SIGNAL, INC-GEISMAR	M	091484	101589	2819	INDUSTRIAL INORGANIC CHEMICALS
LA0006220	MONOCHEM PETROLEUM-GEISMAR	M	092383	102388	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0007129	GEORGIA GULF CORPORATION-PLAQU	M	033084	042889	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0007501	CHEMBOND CORPORATION	M	112186	122191	2869	INDUST. ORGANIC CHEMICALS, NEC

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NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION VI (continued)						
LA0007854	IMC FERTILIZER INC.	M	052088	062093	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0029963	CHEVRON CHEMICAL CO.-ST.JAMES	M	092383	102388	2865	CYCLIC CRUDES AND INTERMEDIATE
LA0038245	ROLLINS ENVIRONMENTAL SER INC-	M	031585	041590	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0038890	NALCO CHEMICAL CO.GARYVILLE LA	M	061584	071689	2899	CHEMICAL PREPARATIONS, NEC
LA0041025	CERTAIN-TEED PRODUCTS CORP-CAM	M	070486	080491	2821	PLASTICS MATERIALS AND RESINS
LA0046361	AIR PROD & CHEM INC-ST CHARLES	M	082385	082390	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0050962	SHELL CHEMICAL CO-POLYPROPYLEN	M	091484	101589	2821	PLASTICS MATERIALS AND RESINS
LA0055794	OCCIDENTAL CHEMICAL CORP.	M	083184	093089	2821	PLASTICS MATERIALS AND RESINS
LA0056171	OCCIDENTAL CHEMICAL CORP.	M	072983	083088	2812	ALKALIES AND CHLORINE
LA0059846	OCCIDENTAL CHEMICAL CORP.	M	082184	082189	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0069612	UNION TEXAS PRODUCTS CORP. - G	M	123185	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0069850	OCCIDENTAL CHEMICAL CORP.-LAKE	M	080886	090891	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0069914	CELERON OIL & GAS COMPANY-JENN	M	063086	063091	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0070793	COMPLEX CHEMICAL-TALLULAH	M	022087	032092	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0071111	VIDALIA ETHANOL I-VIDALIA	M	011487	011492	2869	INDUST. ORGANIC CHEMICALS, NEC
LA0071382	WESTLAKE POLYMERS CORP-LOW DEN	M	031387	041392	2821	PLASTICS MATERIALS AND RESINS
	(OK = 2)					
OK0000388	PONY INDUSTRIES, INC.	M	060184	070289	2821	PLASTICS MATERIALS AND RESINS
OK0001031	VISTA CHEMICAL-OKLAHOMA CITY P	M	060184	090289	2821	PLASTICS MATERIALS AND RESINS
	(TX = 77)					
TX0000574	BORDEN INC., DIBALL, TEXAS	M	061783	071788	2821	PLASTICS MATERIALS AND RESINS
TX0000949	TEXAS EASTMAN CO-LONGVIEW	M	092085	102090	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0002798	MOBAY CHEMICAL CO-BAYTOWN	M	052987	062992	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0002836	QUANTUM CHEMICAL CORPORATION	M	091484	101589	2821	PLASTICS MATERIALS AND RESINS
TX0002844	UNION CARBIDE CORP-PORT LAVACA	M	092785	052391	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0002933	DOW CHEMICAL CO.-LAPORTE-FREEP	M	050385	060390	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0002968	FIRESTONE SYN RUBBER-ORANGE	M	041288	041293	2822	SYNTHETIC RUBBER
TX0003531	LYONDELL PETROCHEMICAL CO.	M	080787	090792	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0003689	GOODYEAR TIRE & RUBBER-HOUSTON	M	091484	101589	2822	SYNTHETIC RUBBER
TX0003875	MONSANTO COMPANY	M	092385	092390	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0003948	CHEVRON CHEMICAL CO-CEDAR BAYO	M	070585	080590	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0004669	E I DUPONT DE NEMOURS-BEAUMONT	M	082385	082390	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0004731	ETHYL CORP-PASADENA	M	092884	102989	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0004758	AMOCO CHEMICAL COMPANY	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0004821	AMOCO CHEMICAL CO-CHOC BAYOU	M	083184	093089	2821	PLASTICS MATERIALS AND RESINS
TX0004839	CHEVRON CHEMICAL CO.-ORANGE	M	081586	010289	2821	PLASTICS MATERIALS AND RESINS
TX0004863	SHELL OIL CO-HOUSTON	M	092884	102889	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0004961	MOBAY SYNTH CORP & TX PET CORP	M	091484	101591	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0005061	GOODYEAR TIRE & RUBBER CO.-BEA	M	122982	122987	2822	SYNTHETIC RUBBER
TX0005070	TEXACO CHEMICAL COMPANY	M	072685	072690	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0005096	KOPPERS	M	062485	062490	2865	CYCLIC CRUDES AND INTERMEDIATE

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NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION VI (continued)						
TX0005576	BTL SPECIALTY RESINS CORP-HOUS	M	082984	082989	2821	PLASTICS MATERIALS AND RESINS
TX0005584	MERICHEM CO-HOUSTON	M	092884	102989	2865	CYCLIC CRUDES AND INTERMEDIATE
TX0005592	TEXACO CHEMICAL COMPANY-CONROE	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0005606	TEXACO CHEMICAL COMPANY-PORT N	M	080885	080890	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0005860	AMERICAN TEXMARK, INC DBA TEXM	M	081787	081792	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0005941	ROLLINS ENVIRONMENTAL SERVICES	M	101885	111890	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0006017	CELANESE CHEMICAL CO-BAY CITY	M	092884	102989	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0006025	CELANESE ENGINEERING RESINS	M	092884	102989	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0006033	SOLTEX-DEER PARK (CELANESE)	M	082184	082189	2821	PLASTICS MATERIALS AND RESINS
TX0006050	E I DUPONT DE NEMOURS-VICTORIA	M	060184	070289	2821	PLASTICS MATERIALS AND RESINS
TX0006068	ARISTECH CHEMICAL CORP.	M	032185	032190	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0006084	ROHM & HASS-DEER PARK	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0006297	QUANTUM CHEMICAL CORPORATION	M	120283	010289	2821	PLASTICS MATERIALS AND RESINS
TX0006327	E I DUPONT DE NEMOURS-ORANGE	M	092884	102989	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0006335	OCCIDENTAL CHEMICAL CORPORATIO	M	091484	101589	2821	PLASTICS MATERIALS AND RESINS
TX0006483	DOW CHEMICAL CO-FREEPORT	M	092587	102592	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0006602	WITCO CHEMICAL CORP-POINT COMF		020485	020490	2865	CYCLIC CRUDES AND INTERMEDIATE
TX0007021	EXXON CHEMICAL AMERICAS-HOUSTO	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0007048	LUBRIZOL CORP-HOUSTON	M	092884	102989	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0007064	PENNWALT CORP-HOUSTON	M	030885	040890	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0007323	GAF CHEMICALS CORP.	M	091484	080890	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0007421	FINA OIL & CHEMICAL CO.-DEER P	M	072988	082993	2821	PLASTICS MATERIALS AND RESINS
TX0007439	FERMENTA PLT PROT,A SUB SDS BI	M	053185	063090	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0007552	PHILLIPS CHEMICAL COMPANY	M	091484	101589	2821	PLASTICS MATERIALS AND RESINS
TX0007897	ALLIED-SIGNAL, INC.-ORANGE	M	020885	031190	2821	PLASTICS MATERIALS AND RESINS
TX0007951	COOK PAINT & VARNISH	M	020485	020490	2821	PLASTICS MATERIALS AND RESINS
TX0008737	RHONE-POULENC, INCORPORATED	M	082184	082189	2865	CYCLIC CRUDES AND INTERMEDIATE
TX0008761	NALCO CHEMICAL CO.-FREEPORT	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0008788	BASF CORPORATION	M	092785	092790	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0008907	E I DUPONT DE NEMOURS-INGLESID	M	072685	082690	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0008931	PD GLYCOL & PPG IND.INC, JOINT	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0028011	JETCO PETR	M	051785	061790	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0030139	UNION CARBIDE-BROWNSVILLE	M	072084	072089	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0030228	ARCO CHEMICAL CO-BAYPORT	M	052584	062589	2865	CYCLIC CRUDES AND INTERMEDIATE
TX0052825	PENNWALT CORP-BEAUMONT	M	081988	091993	2819	INDUSTRIAL INORGANIC CHEMICALS
TX0053813	SHINTECH	M	060184	070289	2821	PLASTICS MATERIALS AND RESINS
TX0056529	ROHM AND HAAS-DEER PARK	M	051785	061790	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0059285	ADVANCED AROMATICS, INC.	M	082984	082989	2865	CYCLIC CRUDES AND INTERMEDIATE
TX0059447	DOW CHEMICAL CO-FREEPORT	M	011885	021890	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0060933	PILOT INDUSTRIES OF TEX, INC		013087	013092	2911	PETROLEUM REFINING
TX0062448	CHEMALL, INC.-PORT NECHES	M	010683	010688	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0063967	CHEVRON CHEMICAL CO.-CHANNELVI	M	091484	101589	2821	PLASTICS MATERIALS AND RESINS
TX0067946	SCHENECTADY CHEMICALS INC-FREE		101185	101190	2865	CYCLIC CRUDES AND INTERMEDIATE

* = Major (M) or Minor (blank) facility
updated 10-3-88

LIST OF KNOWN OCPSF ACTIVE DIRECT DISCHARGERS BY REGION (CONTINUED)

NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION VI (continued)						
TX0068934	MOBIL CHEM-LDPE PLANT-BEAUMONT	M	092085	110387	2821	PLASTICS MATERIALS AND RESINS
TX0070416	LA PORTE CHEMICALS CORP/C/O TH	M	092884	102989	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0072320	GEORGIA-GULF CORP-HOUSTON	M	072084	072089	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0074276	ARISTECH CHEMICAL CORP.	M	092884	102989	2821	PLASTICS MATERIALS AND RESINS
TX0076996	CCPC CHEMICAL INC.	M	092884	102989	2824	ORGANIC FIBERS, NONCELLULOSIC
TX0077577	B P CHEMICALS AMERICA INC.	M	030885	040890	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0077593	QUANTUM CHEMICAL CORPORATION	M	091484	101589	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0077887	EXXON CHEMICAL CO USA-BAYTOWN	M	083184	093089	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0082261	GEORGIA-PACIFIC RESINS, INC.	M	071684	071689	2821	PLASTICS MATERIALS AND RESINS
TX0082805	CCPC CHEMICAL INC.		121082	033186	2911	PETROLEUM REFINING
TX0085570	FORMOSA PLASTICS CORP. U.S.A.	M	092785	092790	2869	INDUST. ORGANIC CHEMICALS, NEC
TX0089125	EXXON CHEM CO-MONT BELVIEU PLA	M	092587	102592	2821	PLASTICS MATERIALS AND RESINS
TX0100404	AMOCO CHEMICALS CO,CEDAR BAYOU	M	071186	071191	2869	INDUST. ORGANIC CHEMICALS, NEC
REGION VII (total = 4)						
	(IA = 3)					
IA0000191	QUANTUM CHEMICAL CORPORATION	M	101487	103191	2821	PLASTICS MATERIALS AND RESINS
IA0000205	MONSANTO CO MUSCATINE	M	080982	050187	2879	AGRICULTURAL CHEMICALS, NEC
IA0002038	FREEMAN CHEMICAL CORP BURLING		112984	103189	2821	PLASTICS MATERIALS AND RESINS
	(MO = 1)					
MO0000311	HERCULES INC., LOUISIANA	M	123186	123091	2873	NITROGENOUS FERTILIZERS
REGION VIII (total = 2)						
	(UT = 1)					
UT0000361	GENEVA STEEL-BASIC MGF TECH UT	M	110581	063086	3312	BLAST FURNACES AND STEEL MILLS
	(WY = 1)					
WY0032590	UNION PACIFIC RR-LARAMIE TRPLT	M	032086	013191	2865	CYCLIC CRUDES AND INTERMEDIATE
REGION IX (total = 4)						
	(CA = 4)					
CA0004936	DUPONT DE NEMOURS&CO	M	081084	050189	2869	INDUST. ORGANIC CHEMICALS, NEC
CA0027693	ASHLAND CHEMICAL CO.		112'84	112189	5161	CHEMICALS AND ALLIED PRODUCTS
CA0055182	A & E PLASTICS		042384	041089	3079	MISCELLANEOUS PLASTICS RPODUCT
CA0058033	ROHM & HASS OF SO. CA	M	012688	011093	2821	PLASTICS MATERIALS AND RESINS

* = Major (M) or Minor (blank) facility
updated 10-3-88

LIST OF KNOWN OCPSF ACTIVE DIRECT DISCHARGERS BY REGION (CONTINUED)

NPDES NO.	FACILITY NAME	*	EFFEC. DATE	EXPIR. DATE	SIC CODE	SIC DESCRIPTION
REGION X	(total = 4)					
	(WA = 4)					
WA0000256	JAMES RIVER CORP. OF NEVADA	M	101185	101190	2611	PULP MILLS
WA0000281	KALAMA CHEMICAL INC	M	030185	030190	2865	CYCLIC CRUDES AND INTERMEDIATE
WA0000621	SCOTT PAPER CO	M	062485	062490	2611	PULP MILLS
WA0003077	ITT RAYONIER INC (HOQUIAM)	M	093085	093090	2611	PULP MILLS

* = Major (M) or Minor (blank) facility
updated 10-3-88

ATTACHMENT C

COMPLIANCE ASSESSMENT PROCEDURE FOR OCPSF DIRECT DISCHARGERS

(Refer to Section 4 of the strategy)

OBJECTIVE OF THE ASSESSMENT

The objective of this compliance assessment is for NPDES permit writers to determine whether the OCPSF direct dischargers are currently discharging pollutants at levels which could comply with the new BPT and/or BAT Effluent Limitations Guidelines.

PROCEDURE

The following three sections describe a step-by-step procedure to identify and obtain the information necessary to conduct the compliance assessment (Section A), to conduct BPT compliance assessment (Section B), and to conduct BAT compliance assessment (Section C). An example is given immediately after the description of each step. Attachments C-1, C-2, and C-3 provide a blank 3-page worksheet, and an example of how the worksheet is used, and a 4-page summary of OCPSF guidelines, respectively.

Use the information on Form 2C, PCS, the 1983 §308 survey data (based on 1980 production/effluent data), and the 48 Plants Sampling Database compiled by EPA for the permit limit calculations and for the comparison of calculated results with the effluent quality data. If data is unavailable or insufficient, additional production and/or self-monitoring data should be requested from the permittee (see Attachment D for a sample information request).

EXAMPLE FOR THE CALCULATION PROCEDURE

Plastiform, Inc. located in Anytown, USA produces a variety of thermoplastic and thermosetting resins and commodity organic chemicals covered under SIC codes 2821 and 2869. The long-term daily average process wastewater flow from Plastiform is 3.2 MGD. Process wastewater is combined before activated sludge treatment and is discharged through outfall 001. The non-*contact* cooling tower blowdown, having a long-term average flow of 1.1 MGD, contains an average TSS of 10 mg/L and is combined with the treated process wastewater before discharging through Outfall 001. Form 2C contains the following information:

OCPSF PRODUCT	ANNUAL PRODUCTION MILL.LBS/YR	WASTE WATER FLOW	MANUFACTURING PROCESS
SAN resins	100.2	0.60	Emulsion and Suspension Polymerization
Phenolic resins	4.7	0.82	Polycondensation of phenol with formaldehyde
Polystyrene	215.4	0.45	Mass polymerization of styrene
Formaldehyde	60.8	1.33	Dehydration, oxidation of methanol with silver catalyst

Section A. Identify and obtain the information necessary to conduct the compliance assessment, i.e., to calculate permit limits for an OCPSF facility.

Step A-1 Identify outfalls which discharge OCPSF process wastewater(s)

EXAMPLE

NPDES No. AT0000001 Facility Plastiform - Anytown Outfall 001

Step A-2 For each OCPSF outfall, list the OCPSF product(s), SIC codes, annual production of the OCPSF product(s), and the respective OCPSF process waste flow(s) as follows:

EXAMPLE

OCPSF PRODUCT (Compare to 40CFR Parts B thru H & Table VII in App. III-A of Dev.Doc)	SIC CODE	ANNUAL PRODUCTION (million lbs/yr)	PROCESS WASTE FLOW* (MGD) (2)
SAN resin	2821	100.2	0.60
Phenolic resins	2821	4.7	0.82
Polystyrene	2821	215.4	0.45
Formaldehyde	2865	60.8	1.33

* Use the long-term average flow, e.g., the highest monthly average flow during the past twelve (12) months or the highest yearly mean of the twelve monthly average flows during the past five (5) years. In situations where flow varies significantly from month-to-month, use discretion to develop a case-by-case determination.

Step A-3 From 1983 §308 survey data or Form 2C, determine the manufacturing process for each OCPSF product. Using Appendix A of 40 CFR 414, identify the process which is listed as non-complexed metal/cyanide bearing wastestream. Enter the listed metal or cyanide in the appropriate row of column (4) as follows:

EXAMPLE

OCPSF PRODUCT	MANUFACTURING PROCESS (Compare to Appendix A to 40 CFR Part 414)	NON-COMPLEXED METAL/CYANIDE BEARING WASTE (from Appendix A) (4)
SAN resin	Emulsion & suspension polymeriza.	Cr, Zn
Phenolic resins	Polycondensation of phenol/formal	-
Polystyrene	Mass polymerization of Styrene	-
Formaldehyde	Dehydration, oxidation of	Ag (BPJ)
	methanol with silver catalyst	

Step A-4 Calculate total annual production (in million pounds per year) and total process wastewater flow (in MGD) as follows:

EXAMPLE

OCPSF PRODUCT	SIC CODE	ANNUAL PRODUCTION (million lbs/yr)	PROCESS WASTE FLOW (MGD) (2)
TOTAL		(1) 381.1	(3) 3.20

Step A-5 Determine if there is any non-OCPSF process wastewater or nonprocess wastewater discharging to the same outfall and contains detectable BOD5 or TSS. If yes, enter its long-term average flow and assign allowable concentrations based on the permit writer's BPJ. If no, go to step A-6.

EXAMPLE

Non-OCPSF process wastewater and nonprocess wastewater (BPJ): (Description)	NON-OCPSF FLOW(5) (MGD)	BPJ CONCENTRATION (6) BOD5 (mg/L) Max.	BOD5 Avg.	TSS (mg/L) Max.	TSS Avg.
Non-contact cooling tower blowdown	1.10	0	0	20	10

Step A-6 Calculate total flow discharged from this outfall (Box 3 + Box 5):

EXAMPLE

TOTAL FLOW FROM
THIS OUTFALL (7)
= 3.20 + 1.10

4.30

Section B. Conduct BPT compliance assessment, i.e., calculate BPT limits based on the information acquired in Section A, then compare the results with the existing discharge quality.

Step B-1 If all contributing OCPSF process wastewaters pertain to a single OCPSF subcategory, obtain the corresponding BPT limits from Table 1 of Attachment C-2 and go to Step B-3.

If more than one subcategory applies to the OCPSF process wastewater, follow the steps below:

- Categorize the OCPSF products into each subcategory
- Enter their respective annual production
- Sub-total annual production within each subcategory
- Divide each sub-total by the total annual production
- Enter the subcategory proportion in each corresponding row.

EXAMPLE

SUB-PART	SUBCATEGORY (from 40 CFR Parts B-H)	OCPSF PRODUCT	ANNUAL PRODUCT. million lbs/year	SUB-TOTAL (8)	SUBCATEGORY PROPORTION (9)=(8)/(1)
D	Thermoplastic Resins	SAN Resins	100.2	315.6	0.83
		Polystyrene	215.4		
E	Thermosetting Resins.	Phenolic Resins	4.7	4.7	0.01
F	Commodity Organic Chemicals	Formaldehyde	60.8	60.8	0.16
			TOTAL =	(1) 381.1	1.00

Step B-2 Obtain the BPT limits from Table 1 and calculate production-weighted concentration limits as follows:

EXAMPLE

SUB-PART	SUBCATEGORY PROPORTION (9)=(8)/(1)	SUBCATEGORY LIMITS (10), from Table 1				CALCULATED LIMITS (11) = (9) x (10)			
		BOD5		TSS		BOD5		TSS	
		Max.	Avg.	Max.	Avg.	Max.	Avg.	Max.	Avg.
D	0.83	64	24	130	40	53	20	108	33
E	0.01	163	61	216	67	2	1	2	1
F	0.16	80	30	149	46	13	5	24	7
	1.00								

Step B-3 Add calculated concentrations in each subcategory and obtain the production-weighted concentration limits for OCPSF process wastewater as follows: [If all contributing OCPSF process wastewater pertain to a single OCPSF subcategory, enter the BPT limits (from Table 1) in row (12).]

EXAMPLE

	CALCULATED LIMITS			
	BOD5		TSS	
	Max.	Avg.	Max.	Avg.
(12) TOTAL =	68 mg/L	26 mg/L	134 mg/L	41 mg/L

Step B-4 If no additional non-OCPSF process wastewater or other nonprocess wastewaters is discharged from this outfall, go to Step B-8.

If there are other wastewaters discharged from the same outfall, multiply the results from Step B-3 by the total OCPSF process flow (from Box 3 in Step A-4) as follows:

EXAMPLE

(13) = (12) x 3.20 =	218	83	429	131

Step B-5 Calculate BPJ allowance for non-OCPSF process wastewaters or other nonprocess wastewaters (from Box 5 in Step A-5) as follows:

EXAMPLE

(14) = 1.10 x (6) =	0	0	22	11

Step B-6 Add the results of Steps B-4 and B-5 as follows:

EXAMPLE

(15) = (13) + (14) =	218	83	451	142

Step B-7 Divide the results from Step B-6 by the total wastewater flow discharged from this outfall (from Box 7 in Step A-6). The result gives the expected concentrations discharged from this outfall if all the flows are the same as those given in Form 2C.

EXAMPLE

EXPECTED CONCENTRATION FROM THIS OUTFALL:

(16) = (15) / 4.30 =	51 mg/L	19 mg/L	105 mg/L	33 mg/L

****
* COMPLIANCE ASSESSMENT *
****

Step B-8 Compare the results from Step B-3 or B-7 with the daily maximum and monthly average concentrations reported on form 2C, DMR reports, the 1983 §308 survey data, or the 48 plant sampling database. If the current discharge level exceeds the results from Step B-7, follow Section 4.a.2 or 4.b.2 of the strategy.

Step B-9 Calculate the mass loading limits by multiplying the results from Step B-3 or B-6 by 8.34 (unit conversion factor) as follows:

EXAMPLE

FINAL MASS LOADING LIMITS ON THE PERMIT:

(15) x 8.34 =

1818 lb/d	**692** lb/d	**3761** lb/d	**1184** lb/d

****
* COMPLIANCE ASSESSMENT *
****

Step B-10 Compare the results from Step B-9 with the daily maximum and monthly average mass loadings reported on Form 2C, DMR reports, the 1983 §308 survey data, or the 48 plant sampling database. If the current discharge level exceeds the results from Step B-9, follow Section 4.a.2 or 4.b.2 of the strategy.

Section C. Conduct BAT compliance assessment, i.e., calculate BAT limits based on the information acquired in Section A, then compare the results with the existing discharge quality.

Step C-1 Determine if the total annual production is less than or equal to 5 million pounds per year. If yes, no additional calculation is necessary. If no, complete this section.

EXAMPLE

_____ Yes, BAT = BPT. __X__ No. Go to Step C-2.

Step C-2 Identify the type(s) of treatment the facility uses for treating the OCPSF process wastewater. Determine whether end-of-pipe biological treatment is used. If yes, BAT limits in 40 CFR 414 Subpart I apply. If no, BAT limits in 40 CFR 414 Subpart J apply.

EXAMPLE

Type of Treatment for the OCPSF Process Wastewater:

Activated Sludge treatment after process wastewaters are combined

End-of-Pipe (EOP) Biological Treatment Used?
__X__ Yes (use Subpart I) _____ No (use Subpart J)

Step C-3 If none of the non-complexed metal-bearing or cyanide-bearing wastestream(s) is identified in Step A-3, go to Step C-6.

If any non-complexed metal-bearing or cyanide-bearing wastestream is identified, enter the BAT limit, from Subpart I or J depending on the result of Step C-2, for the parameter and its corresponding OCPSF process wastewater flow (from Column (2) in Step A-2) as follows:

EXAMPLE

NON-COMPLEXED WASTE PARAMETER (from Column (4), Step A-3)	BAT LIMITS (17) (from Subpart I/J) Daily Max (ug/L)	Monthly Avg (ug/L)	WASTEWATER FLOW (18) (from Step A-2) (MGD)
Cr	2,770	1,110	0.60
Zn	2,610	1,050	0.60
Ag (BPJ)	200	100	1.33

Step C-4 Multiply the BAT limit by its corresponding flow, divide the result by the total wastewater flow discharged from this outfall (from Box 7 in Step A-6), then multiply by 0.001 (unit conversion factor). The result gives the expected concentrations discharged from this outfall if all flows are the same as those given in Form 2C.

Calculate the mass loading limits by multiplying the BAT limit by its corresponding flow and 0.00834 (unit conversion factor) as follows:

EXAMPLE

FINAL CONCENTRATION LIMITS ON PERMIT (mg/L)-optional [(17) x (18)/4.30] x 0.001		FINAL MASS LIMITS ON THE PERMIT (lbs/day) (17) x (18) x 0.00834	
Daily Max.	Monthly Avg.	Daily Max.	Monthly Avg.
0.39	0.15	13.9	5.6
0.36	0.15	13.1	5.3
0.06	0.03	2.2	1.1

****
* COMPLIANCE ASSESSMENT *
****

Step C-5 Compare the results from Step C-4 with the daily maximum and monthly average concentrations and mass loadings reported on Form 2C, DMR reports, the 1983 §308 survey data, or the 48 plant sampling database. If current discharge level exceeds the results from Step C-4, follow Section 4.a.2 or 4.b.2 of the strategy.

Step C-6 Enter BAT limits, from Subpart I or J depending on the result of Step C-2, for the rest of the BAT parameters.

EXAMPLE

PARAMETER (from Subpart I or J)	BAT LIMITS (19) (from Subpart I or J) Daily Max. (ug/L)	Monthly Avg. (ug/L)
Acenaphthene	59	22
.	.	.
(list all) .	.	.
.	.	.
Vinyl Chloride	268	104

Step C-7 Multiply the BAT limit by the total OCPSF process wastewater flow (from Box 3 in Step A-2), divide the result by the total wastewater flow discharged from this outfall (from Box 7 in Step A-6), then multiply by 0.001 (unit conversion factor). These are the expected concentrations discharged from this outfall if all flows are the same as those given in Form 2C.

Calculate the mass loading limits by multiplying the BAT limits by the total OCPSF process wastewater flow and by 0.00834 (unit conversion factor) as follows:

EXAMPLE

FINAL CONCENTRATION LIMITS ON THE PERMIT (mg/L)-optional [(19) x 3.20 /4.30] x 0.001		FINAL MASS LOADING LIMITS ON THE PERMIT (lbs/day) (19) x 3.20 x 0.00834	
Daily Max.	Monthly Avg.	Daily Max.	Monthly Avg.
0.044	0.016	1.57	0.59
.	.	.	.
.	.	.	.
.	.	.	.
0.199	0.077	7.15	2.78

****
* COMPLIANCE ASSESSMENT *
****

Step C-8 Compare the results from Step C-7 with the daily maximum and monthly average concentrations and mass loadings reported on Form 2C, DMR reports, the the 1983 §308 survey data, or the 48 plant sampling database. If current discharge level exceeds the results from Step C-7, follow Section 4.a.2 or 4.b.2 of the strategy.

NOTE: If all pollutants discharged from this facility are at levels below the calculated results from Steps B-7, B-9, C-4, and C-7, follow Section 4.a.1 or 4.b.1 of the strategy.

(Compliance Assessment Procedure continued)

ATTACHMENT C-1

WORKSHEET FOR OCPSF PERMIT WRITING

BASIC INFORMATION FOR OCPSF PERMIT LIMITS CALCULATION

NPDES No._____ Facility Name _____ Outfall _____

OCPSF PRODUCT (Compare to Sub-parts B thru H & Table VII in App. III-A of Dev.Doc)	SIC CODE	ANNUAL PRODUCTION (million lbs/yr)	PROCESS WASTE FLOW* (MGD) (2)	MANUFACTURING PROCESS (Compare to Appendix A to 40 CFR Part 414)	NON-COMPLEXED PARAMETER (for the process with Non-Complexed Metal/Cyanide Bearing Waste Stream) (4) (from Appendix A)
TOTAL		(1)	(3)		

Non-OCPSF Process Wastewater and nonprocess wastewater based on permit writer's BPJ:

(Description)

_____

_____

_____

NON-OCPSF FLOW(5) (MGD)	ADDITIONAL ALLOWANCE (6) BOD5 (mg/L) Max.	Avg.	TSS (mg/L) Max.	Avg.

TOTAL FLOW FROM THIS OUTFALL (7)
= (3) + (5)

= [ ]

* Use long-term average flow, e.g., the highest monthly average flow during the past twelve (12) months or the highest yearly mean of the twelve monthly average flows during the past five (5) years. In situations where flow varies significantly from month-to-month, use discretion to develop a case-by-case determination.

1-12-89

WORKSHEET FOR OCPSF-BPT LIMITS CALCULATION

NPDES No._____ Facility Name _____ Outfall _____

SUB-PART	SUBCATEGORY (from 40 CFR Subparts B-H)	OCPSF PRODUCT	ANNUAL PRODUCT. million lbs/year	SUB-TOTAL (8)	SUBCATEGORY PROPORTION (9)=(8)/(1)	SUBCATEGORY LIMITS (10), see Table 1 BOD5 Max.	BOD5 Avg.	TSS Max.	TSS Avg.	CALCULATED LIMITS (11) = (9) x (10) BOD5 Max.	BOD5 Avg.	TSS Max.	TSS Avg.
		TOTAL =		(1)	1.00				(12) TOTAL =	mg/L	mg/L	mg/L	mg/L

Skip (13) thru (15) if no additional non-OCPSF or other nonprocess wastewaters discharged from this outfall:	(13) = (12) x (3) =				
Additional Allowance for non-OCPSF or other nonprocess wastewaters:	(14) = (5) x (6) =				
	(15) = (13) + (14) =				
FINAL CONCENTRATION LIMITS ON THE PERMIT (OPTIONAL):	(16) = (15) / (7) =	mg/L	mg/L	mg/L	mg/L
FINAL MASS LOADING LIMITS ON THE PERMIT:	(15) x 8.34 =	lb/d	lb/d	lb/d	lb/d

WORKSHEET FOR OCPSF-BAT LIMITS CALCULATION

NPDES No. _____ Facility Name _____ Outfall _____

Is the Total OCPSF Annual Production (Box 1 on page 1) less than or equal to 5 million lbs/year?
___ Yes, BAT = BPT. ___ No. Please continue.

Type of Treatment for the OCPSF Process Wastewater: _____

_____

End-of-Pipe (EOP) Biological Treatment? ___ Yes (use Subpart I) ___ No (use Subpart J)

For **Cr, Cu, Pb, Ni, Zn, and total cyanide**, use the following table:

NON-COMPLEXED WASTE PARAMETER (from Column (4) on page 1)	BAT LIMITS (17) (from Subpart I/J) Daily Max (ug/L)	Monthly Avg (ug/L)	WASTEWATER FLOW (18) (from (2)) (MGD)	**FINAL CONCENTRATION LIMITS** ON PERMIT (mg/L)-**optional** [(17) x (18)/(7)] x 0.001 Daily Max.	Monthly Avg.	**FINAL MASS LIMITS** ON THE PERMIT (lbs/day) (17) x (18) x 0.00834 Daily Max.	Monthly Avg.

For the remaining BAT parameters, use the following table:

PARAMETER (from Subpart I or J)	BAT LIMITS (19) (from Subpart I or J) Daily Max. (ug/L)	Monthly Avg. (ug/L)	**FINAL CONCENTRATION LIMITS** ON THE PERMIT (mg/L)-**optional** [(19) x (3) / (7)] x 0.001 Daily Max.	Monthly Avg.	**FINAL MASS LOADING LIMITS** ON THE PERMIT (lbs/day) (19) x (3) x 0.00834 Daily Max.	Monthly Avg.

(Compliance Assessment Procedure continued)

ATTACHMENT C-2

EXAMPLE OF HOW THE OCPSF WORKSHEET IS USED

EXAMPLE

BASIC INFORMATION FOR OCPSF PERMIT LIMITS CALCULATION

NPDES No. AT 0000001 Facility Name Plastiform - Anytown Outfall 001

OCPSF PRODUCT (Compare to Sub-parts B thru H & Table VII in App. III-A of Dev.Doc)	SIC CODE	ANNUAL PRODUCTION (million lbs/yr)	PROCESS WASTE FLOW* (MGD) (2)	MANUFACTURING PROCESS (Compare to Appendix A to 40 CFR Part 414)	NON-COMPLEXED PARAMETER (for the process with Non-Complexed Metal/Cyanide Bearing Waste Stream) (4) (from Appendix A)
SAN resin	2821	100.2	0.60	Emulsion & suspension polymeriza.	Cr, Zn
Phenolic resins	2821	4.7	0.82	Polycondensation of phenol/formal	-
Polystyrene	2821	215.4	0.45	Mass polymerization of Styrene	-
Formaldehyde	2865	60.8	1.33	Dehydration, oxidation of methanol with silver catalyst	Ag (BPJ)
TOTAL		(1) 381.1	(3) 3.20		

Non-OCPSF process wastewater and nonprocess wastewater based on permit writer's BPJ:

(Description)

Non-contact cooling tower blowdown

NON-PROCESS FLOW(5) (MGD)	ADDITIONAL ALLOWANCE (6) BOD5 (mg/L) Max.	BOD5 Avg.	TSS (mg/L) Max.	TSS Avg.
1.10	0	0	20	10

TOTAL FLOW FROM THIS OUTFALL (7) = (3) + (5)

4.30

* Use long-term average flow, e.g., the highest monthly average flow during the past twelve (12) months or the highest yearly mean of the twelve monthly average flows during the past five (5) years. In situations where flow varies significantly from month-to-month, use discretion to develop a case-by-case determination.

1-12-89

WORKSHEET FOR OCPSF-BPT LIMITS CALCULATION

EXAMPLE

NPDES No. AT 0000001 Facility Name Plastiform - Anytown Outfall 001

SUB-PART	SUBCATEGORY (from 40 CFR Parts B-H)	OCPSF PRODUCT	ANNUAL PRODUCT. million lbs/year	SUB-TOTAL (8)	SUBCATEGORY PROPORTION (9)=(8)/(1)	SUBCATEGORY LIMITS (10), see Table 1 BOD5 Max.	BOD5 Avg.	TSS Max.	TSS Avg.	CALCULATED LIMITS (11) = (9) x (10) BOD5 Max.	BOD5 Avg.	TSS Max.	TSS Avg.
D	Thermoplastic Resins	SAN Resins	100.2	315.6	0.83	64	24	130	40	53	20	108	33
		Polystyrene	215.4										
E	Thermosetting Resins	Phenolic Resins	4.7	4.7	0.01	163	61	216	67	2	1	2	1
F	Commodity Organic Chemicals	Formaldehyde	60.8	60.8	0.16	80	30	149	46	13	5	24	7
			TOTAL =	(1) 381.1	1.00				TOTAL = (12)	68 mg/L	26 mg/L	134 mg/L	41 mg/L

Skip (13) thru (15) if no additional non-OCPSF or other nonprocess wastewaters discharged from this outfall: (13) = (12) x (3) = 218 | 83 | 429 | 131

Additional Allowance for non-OCPSF process wastewater and other nonprocess wastewaters: (14) = (5) x (6) = 0 | 0 | 22 | 11

(15) = (13) + (14) = **218 | 83 | 451 | 142**

FINAL CONCENTRATION LIMITS ON THE PERMIT (OPTIONAL): (16) = (15) / (7) = **51 mg/L | 19 mg/L | 105 mg/L | 33 mg/L**

FINAL MASS LOADING LIMITS ON THE PERMIT: (15) x 8.34 = **1818 lb/d | 692 lb/d | 3761 lb/d | 1184 lb/d**

WORKSHEET FOR OCPSF-BAT LIMITS CALCULATION

EXAMPLE

NPDES No. AT 0000001 Facility Name Plastiform - Anytown Outfall 001

Is the Total OCPSF Annual Production (Box 1 on page 1) less than or equal to 5 million lbs/year?
___ Yes, BAT = BPT. X No. Please continue.

Type of Treatment for the OCPSF Process Wastewater: Activated Sludge treatment after process wastewaters are combined

End-of-Pipe (EOP) Biological Treatment? X Yes (use Subpart I) ___ No (use Subpart J)

For Cr, Cu, Pb, Ni, Zn, and total cyanide, use the following table:

NON-COMPLEXED WASTE PARAMETER (from Column (4) on page 1)	BAT LIMITS (17) (from Subpart I/J) Daily Max (ug/L)	Monthly Avg (ug/L)	WASTEWATER FLOW (18) (from (2)) (MGD)	FINAL CONCENTRATION LIMITS ON PERMIT (mg/L)-optional [(17) x (18)/(7)] x 0.001 Daily Max.	Monthly Avg.	FINAL MASS LIMITS ON THE PERMIT (lbs/day) (17) x (18) x 0.00834 Daily Max.	Monthly Avg.
Cr	2,770	1,110	0.60	0.39	0.15	13.9	5.6
Zn	2,610	1,050	0.60	0.36	0.15	13.1	5.3
Ag (BPJ)	200	100	1.33	0.06	0.03	2.2	1.1

For the remaining BAT parameters, use the following table:

PARAMETER (from Subpart I or J)	BAT LIMITS (19) (from Subpart I or J) Daily Max. (ug/L)	Monthly Avg. (ug/L)	FINAL CONCENTRATION LIMITS ON THE PERMIT (mg/L)-optional [(19) x (3) / (7)] x 0.001 Daily Max.	Monthly Avg.	FINAL MASS LOADING LIMITS ON THE PERMIT (lbs/day) (19) x (3) x 0.00834 Daily Max.	Monthly Avg.
Acenaphthene	59	22	0.044	0.016	1.57	0.59
.	.	.	.	.	.	.
(list all) .	.	.	.	.	.	.
.	.	.	.	.	.	.
Vinyl Chloride	268	104	0.199	0.077	7.15	2.78

(Compliance Assessment Procedure continued)

ATTACHMENT C-3

SUMMARY

OF

OCPSF EFFLUENT LIMITATIONS GUIDELINES

This attachment includes the following documents:

Table 1 Summary of OCPSF Effluent Limitations Guidelines

Subparts I (§414.91) and J (§414.101) for BAT limits

Appendix A to Part 414 - Non-complexed Metal-Bearing Waste Streams and Cyanide-Bearing Waste Streams

Appendix B to Part 414 - Complexed Metal-Bearing Waste Streams

TABLE 1 SUMMARY OF OCPSF EFFLUENT GUIDELINES

40 CFR Reference			BPT Daily Maximum (mg/L)	BPT Monthly Average (mg/L)	PSES	BAT
414.20	Subpart B Rayon Fibers	BOD	64	24	47 Organic and Heavy Metals.	Under 5 million pounds production, BAT=BPT. Over 5 million pounds with end-of-pipe biological treatment, subject to 414.91
		TSS	130	40		
414.30	Subpart C Other Fibers	BOD	48	18		Over 5 million pounds without end-of-pipe biological treatment, subject to 414.101.
		TSS	115	36		
414.40	Subpart D Thermoplastics Resins	BOD	64	24		
		TSS	130	40		
414.50	Subpart E Theromsetting Resins	BOD	163	61		
		TSS	216	67		
414.60	Subpart F Commodity Organics	BOD	80	30		
		TSS	149	46		
414.70	Subpart G Bulk Organic Chemicals	BOD	92	34		
		TSS	159	49		
414.80	Subpart H Specialty Organic Chemicals	BOD	120	45		
		TSS	183	57		
414.90	Subpart I Direct Dischargers with EOPBT					Limitations on ~~63~~ 62 toxic pollutants (organics and heavy metals).
414.100	Subpart J Direct Discharges without EOPBT					Limitations on ~~59~~ 58 toxic pollutants (organic and heavy metals).

NOTE: BCT is reserved for all Subparts; pH range is 6-9 for Subparts B through H

Subpart I—Direct Discharge Point Sources That Use End-of-Pipe Biological Treatment

§ 414.91

Effluent characteristics	Effluent limitations BAT and NSPS [1]	
	Maximum for any one day	Maximum for monthly average
Acenaphthene	59	22
Acrylonitrile	242	96
Benzene	136	37
Carbon Tetrachloride	38	18
Chlorobenzene	28	15
1,2,4-Trichlorobenzene	140	68
Hexachlorobenzene	28	15
1,2-Dichloroethane	211	68
1,1,1-Trichloroethane	54	21
Hexachloroethane	54	21
1,1-Dichloroethane	59	22
1,1,2-Trichloroethane	54	21
Chloroethane	268	104
Chloroform	46	21
2-Chlorophenol	98	31
1,2-Dichlorobenzene	163	77
1,3-Dichlorobenzene	44	31
1,4-Dichlorobenzene	28	15
1,1-Dichloroethylene	25	16
1,2-trans-Dichloroethylene	54	21
2,4-Dichlorophenol	112	39
1,2-Dichloropropane	230	153
1,3-Dichloropropylene	44	29
2,4-Dimethylphenol	36	18
2,4-Dinitrotoluene	285	113
2,6-Dinitrotoluene	641	255
Ethylbenzene	108	32
Fluoranthene	68	25
~~Bis(2-Chloroisopropyl) ether~~	~~757~~	~~301~~
Methylene Chloride	89	40
Methyl Chloride	190	86
Hexachlorobutadiene	49	20
Naphthalene	59	22
Nitrobenzene	68	27
2-Nitrophenol	69	41
4-Nitrophenol	124	72
2,4-Dinitrophenol	123	71
4,6-Dinitro-o-cresol	277	78
Phenol	26	15
Bis(2-ethylhexyl) phthalate	279	103
Di-n-butyl phthalate	57	27
Diethyl phthalate	203	81
Dimethyl phthalate	47	19
Benzo(a)anthracene	59	22
Benzo(a)pyrene	61	23
3,4-Benzofluoranthene	61	23
Benzo(k)fluoranthene	59	22
Chrysene	59	22
Acenaphthylene	59	22
Anthracene	59	22
Fluorene	59	22
Phenanthrene	59	22
Pyrene	67	25
Tetrachloroethylene	56	22
Toluene	80	26
Trichloroethylene	54	21
Vinyl Chloride	268	104
Total Chromium	2,770	1,110
Total Copper	3,380	1,450
Total Cyanide	1,200	420
Total Lead	690	320
Total Nickel	3,980	1,690
Total Zinc [2]	2,610	1,050

[1] All units are micrograms per liter.
[2] Total Zinc for Rayon Fiber Manufacture that uses the viscose process and Acrylic Fiber Manufacture that uses the zinc chloride/solvent process is 6,796 μg/l and 3,325 μg/l for maximum for any one day and maximum for monthly average, respectively.

Subpart J—Direct Discharge Point Sources That Do Not Use End-of-Pipe Biological Treatment

§ 414.101

Effluent characteristics	BAT effluent limitations and NSPS [1]	
	Maximum for any one day	Maximum for monthly average
Acenaphthene	47	19
Acrylonitrile	232	94
Benzene	134	57
Carbon Tetrachloride	380	142
Chlorobenzene	380	142
1,2,4-Trichlorobenzene	794	196
Hexachlorobenzene	794	196
1,2-Dichloroethane	574	180
1,1,1-Trichloroethane	59	22
Hexachloroethane	794	196
1,1-Dichloroethane	59	22
1,1,2-Trichloroethane	127	32
Chloroethane	295	110
Chloroform	325	111
1,2-Dichlorobenzene	794	196
1,3-Dichlorobenzene	380	142
1,4-Dichlorobenzene	380	142
1,1-Dichloroethylene	60	22
1,2-trans-Dichloroethylene	66	25
1,2-Dichloropropane	794	196
1,3-Dichloropropylene	794	196
2,4-Dimethylphenol	47	19
Ethylbenzene	380	142
Fluoranthene	54	22
~~Bis(2-chloroisopropyl)ether~~	~~794~~	~~196~~
Methylene Chloride	170	36
Methyl Chloride	295	110
Hexachlorobutadiene	380	142
Naphthalene	47	19
Nitrobenzene	6,402	2,237
2-Nitrophenol	231	65
4-Nitrophenol	576	162
2,4-Dinitrophenol	4,291	1,207
4,6-Dinitro-o-cresol	277	78
Phenol	47	19
Bis(2-ethylhexyl)phthalate	258	95
Di-n-butyl phthalate	43	20
Diethyl phthalate	113	46
Dimethyl phthalate	47	19
Benzo(a)anthracene	47	19
Benzo(a)pyrene	48	20
3,4-Benzofluoranthene	48	20
Benzo(k)fluoranthene	47	19
Chrysene	47	19
Acenaphthylene	47	19
Anthracene	47	19
Fluorene	47	19
Phenanthrene	47	19
Pyrene	48	20
Tetrachloroethylene	164	52
Toluene	74	28
Trichloroethylene	69	26
Vinyl Chloride	172	97
Total Chromium	2,770	1,110
Total Copper	3,380	1,450
Total Cyanide	1,200	420
Total Lead	690	320
Total Nickel	3,980	1,690
Total Zinc [2]	2,610	1,050

[1] All units are micrograms per liter.
[2] Total Zinc for Rayon Fiber Manufacture that uses the viscose process and Acrylic Fibers Manufacture that uses the zinc chloride/solvent process is 6,796 μg/l and 3,325 μg/l for maximum for any one day and maximum for monthly average, respectively.

Appendix A to Part 414—Non-Complexed Metal-Bearing Waste Streams and Cyanide-Bearing Waste Streams

Chromium

Methylhydroabietate/Esterification of hydroabietic acid (rosin) with methanol
Acrylic acid/Oxidation of propylene via acrolein
N-butyl alcohol/Hydrogenation of n-Butyraldehyde, Oxo process
Cyclohexanone/From phenol via cyclohexanol by hydrogenation-dehydrogenation
Fatty amines/Hydrogenation of fatty nitriles (batch)
Heliotropin/Oxidation of isosafrole, chromium catalyst
Isobutanol/Hydrogenation of isobutyraldehyde, Oxo process
Cyclohexyl Mercaptan/Cyclohexanol + Hydrogen sulfide
Ethyl Mercaptan/Ethanol + Hydrogen sulfide
Methanol/H.P. Synthesis from natural gas via synthetic gas
Oxo Alcohols, C7–C11/Carbonation & hydrogenation of C6–C10 Olefins
Polyoxypropylene diamine/Polypropylene glycol + Ammonia
n-Propyl alcohol/Hydrogenation of propionaldehyde, Oxo process
SAN resin/Suspension polymerization
Styrene/Dehydrogenation of ethylbenzene
Styrene/Dehydration of methyl benzyl alcohol (coproduct of propylene oxide)
1-Tetralol, 1-Tetralone mix/Oxidation of tetralin (1,2,3,4-Tetrahydronaphthalene)
3,3,3-Trifluoropropene/Catalyzed hydrogen fluoride exchange with chlorinated propane
Vinyl toluene/Dehydrogenation (thermal) of ethyltoluene

Copper

Methylhydroabietate/Esterification of hydroabietic acid (rosin) with methanol
Acetaldehyde/Oxidation of ethylene with cupric chloride catalyst
Acetic acid/Catalytic oxidation of butane
Acetone/Dehydrogenation of isopropanol
Acrylamide/Catalytic hydration of acrylonitrile
Acrylic acid/Oxidation of propylene via acrolein
Acrylonitrile/Propylene ammoxidation
Adipic acid/Oxidation of cyclohexanol-cyclohexanone mixture
Adipic acid/Oxidation of cyclohexane via cyclohexanol-cyclohexanone mixture
Allynitrile/Allychloride + sodium cyanide
Aniline/Hydrogenation of nitrobenzene
Benzofurans, 2,3-Dihydro-2,2-dimethyl-7-benzofuranol/ from o-Nitrophenol + Methallyl chloride
n-Butyl alcohol/Hydrogenation of n-Butyraldehyde, Oxo process
1,4-Butanediol/Hydrogenation of 1,4-butynediol
Butyrolactone/Dehydrogenation of 1,4-butanediol
Caprolactam/From cyclohexane via cyclohexanone and its oxime
Lilian (hydroxydihydrocitronellal)/Hydration and oxidation of citronellol
1,2-Dichloroethane/Oxyhydrochlorination of ethylene
Dialkyldithiocarbamates, metal salts/ Dialkylamines + carbon disulfide
2-Ethylhexanol/from n-Butyraldehyde by Aldo condensation and hydrogenation
Fatty amines/Hydrogenation of fatty nitriles (batch)
Geraniol/B-Myrcene + Hydrogen chloride, esterification of geranyl chloride, hydrolysis of geranyl acetate
Furfuryl alcohol/Hydrogenation of furfural
Geranial (Citral)/Oxidation of geraniol (copper catalyst)
Glyoxal/Oxidation of ethylene glycol
Isobutanol/Hydrogenation of isobutyraldehyde, Oxo process
Isopropanol/Catalytic hydrogenation of acetone
2-Mercaptobenzothiazoles, copper salt/2-Mercaptobenzothiazole + copper salt
Methanol/High pressure synthesis from natural gas via synthetic gas
Methanol/Low pressure synthesis from natural gas via synthetic gas
Methyl ethyl ketone/Dehydrogenation of sec-Butanol
Oxo alcohols, C7–C11/Carbonation & hydrogenation of C6-C10 olefins
Phenol/Liquid phase oxidation of benzoic acid
Polyoxyalkylene amines/Polyoxyalkylene glycol + ammonia
Polyphenylene oxide/Solution polymerization of 2,6-xylenol by oxidative coupling (cuprous salt catalyst)
Polyoxypropylene diamine/Polypropylene glycol + Ammonia
Quinaldine (dye intermediate)/Skraup reaction of aniline + crotonaldehyde
Silicones, silicone fluids/Hydrolysis and condensation of chlorosilanes
Silicones, silicone rubbers/Hydrolysis and condensation of chlorosilanes
Silicones, silicone specialties (grease, dispersion agents, defoamers & other products)
Silicones: Silicone resins/Hydrolysis & condensation of methyl, phenyl & vinyl chlorosilanes
Silicones: Silicone fluids/Hydrolysis of chlorosilanes to acyclic & cyclic organosiloxanes
Styrene/Dehydration of a-Methylbenzyl alcohol (coproduct of propylene oxide)
Tetrachloroethylene (perchloroethylene)/ Oxyhydrochlorination of tetrachloroethane
Tris(anilino)s-triazine/Cyanuric chloride + aniline + cogeners
Trichloroethylene/Oxyhydrochlorination of tetrachloroethane
Unsaturated polyester resin/Reaction of maleic anhydride + phthalic anhydride + propylene glycol polyester with styrene or methyl methacrylate

Lead

Alkyd resin/Condensation polymerization
Alkyd resins/Condensation polymerization of phthalic anhydride + glycerin + vegetable oil esters
Anti-knock fuel additive/Blending purchased tetraethyl lead & tetramethyl lead additives
Dialkydithiocarbamates, metal salts/ Dialkylamines + carbon disulfide
Thiuram (dimethyldithiocarbamate) hexasulfide/Dimethyldithiocarbamate + sulfur
Triphenylmethane dyes (methyl violet)/ Condensation of Formaldehyde + N-Methylaniline + N,N-dimethylaniline, oxidation of reaction product
4,4'-Bis-(N,N-dimethylaniline) carbinol, Michler's hydrol/Oxidation of 4,4'-Methylene-bis(N,N-dimethylaniline) with lead oxide
Naphthenic acid salts
Stearic acid, metal salts/Neutralization with a metallic base
Tetraethyl lead/Alkyl halide + sodium-lead alloy
Tetramethyl lead/Alkyl halide + sodium-lead alloy

Nickel

Acetates, 7,11-Hexadecadien-1-ol (gossyplure)/Coupling reactions, low pressure hydrogenation, esterification
Acetates, 9-dodecen-1-ol (pheromone)/ Coupling reactions, low pressure hydrogenation, esterification
Acrylic acid/oxidation of propylene via acrolein
Acrylonitrile/Propylene ammoxidation
n Alkanes/Hydrogenation of C6-C22 alpha olefins (ethylene oligomers)
Adiponitrile/Direct cyanation of butadiene
Alkyl amines/Amination of alcohols
4-Aminoacetanilide/Hydrogenation of 4-Nitroacetanilide
BTX/Hydrogenation of olefins (cyclohexenes)
Terphenyls, hydrogenated/Nickel catalyst, hydrogenation of terphenyl
Bisphenol-A, hydrogenated (Biscyclohexanol-A)/Hydrogenation of Bisphenol-A
Butadiene (1,3)/Extractive distillation of C-4 pyrolyzates
n Butanol/Hydrogenation of n-Butyraldehyde, Oxo process
1,3-Butylene glycol/Hydrogenation of acetaldol
1,4-Butanediol/Hydrogenation of 1,4-butynediol
Butylenes (mixed)/Distillation pf C4 pyrolyzates
4-Chloro-2-aminophenol/Hydrogenation of 4-Chloro-2-nitrophenol
Lilial (hydroxydihydrocitronellal)/Hydration and oxidation of citronellol
Cycloparaffins/Catalytic hydrogenation of aromatics in kerosene solvent
Cyclohexanol/Hydrogenation of phenol, distillation
Cyclohexanone/From phenol via cyclohexanol by hydrogenation-dehydrogenation
Dialkyldithiocarbamates, metal salts/ Dialkylamines + carbon disulfide
Ethylamine/Reductive amination of ethanol
Ethylamines (mono, di, tri)/Reductive ammination (ammonia + hydrogen) of ethanol
Isoeugenol, high % trans/Separation of mixed cis & trans isoeugenols
2-Ethylhexanol/from n-Butyraldehyde by Aldol condensation and hydrogenation
Fatty acids, hydrogenated/tallow & coco acids + Hydrogen
Fatty amines/Hydrogenation of fatty nitriles (batch)
Fatty amines/Hydrogenation of tallow & coco nitriles
Glyoxal-urea formaldehyde textile resin/ condensation to N-bis(hydroxymethyl) ureas & N,N'-(dihydroxyethyl) ureas
11-hexadecenal/Coupling rxns, low pressure hydrogenation
Hexahydrophthalic anhydride/Condensation of butadiene & maleic anhydride (Diels-Alder reaction) + hydrogenation
Isobutanol/Hydrogenation of isobutyraldehyde, Oxo process
Diisobutyl amine/Ammonolysis of isobutanol
Isopropyl amines (mono, di)/Reductive ammination (Ammonia + Hydrogen) of isopropanol
Linalool/Pyrolysis of 2-Pinanol
Methanol/High pressure synthesis from natural gas via synthetic gas
Methanol/Low pressure sythesis fron natural gas via synthetic gas
Methanol/Butane oxidation
Tris-(hydroxymethyl) methyl amine/ Hydrogenation of tris(hydroxymethyl) nitromethane
N Methyl morpholine/Morpholine + Methanol
N Ethyl morpholine/Morpholine + Ethanol
2-Methyl-7,8-epoxy octadecane/Coupling reactions, low pressure hydrogenation, epoxidation
Alpha-Olefins/Ethylene oligomer, & Ziegler Cat

Petroleum hydrocarbon resins, hydrogenated/Hydrogenation of petroleum hydrocarbon resin products
Pinane/Hydrogenation of A-Pinene
2-Pinanol/Reduction of pinane hydroperoxide
Bis-(p-Octylphenol) sulfide, Nickel salt/p-Octylphenol + sulfur chloride (S2C12), neutralize with Nickel base
Piperazine/Reductive amination of ethanol amine (ammonia & hydrogenation, metal catalyst)
N,N-Dimethylpiperazine/Condensation piperazine + formaldehyde, hydrogenation
Polyoxylalkylene amines/Polyoxyalkylene glycol + Ammonia
Polyoxypropylene diamine/Polypropylene glycol + Ammonia
2-Amino-2-methyl-1-propanol/Hydrogenation of 2-Nitro 2-methyl-1-propanol
3-Methoxypropyl amine/Reductive amination of acrylamide with methanol & hydrogen
N-Propylamine/Reductive amination (ammonia + hydrogen) of n-propanol
Sorbitol/Hydrogenation of sugars
Sulfolane/Condensation butadiene + sulfur dioxide, Hydrogenation
Thionocarbamates, N-Ethyl-o-isopropyl/Isopropyl xanthate + Ethylamine
Toluene diamine (mixture)/Catalytic hydrogenation of dinitrotoluene
Methylated urea-formaldehyde resins (textile)/Methylation of urea-formaldehyde adduct
Methylated urea-formaldehyde glyoxol (textile resin)/Reaction of methylated urea-formaldehyde + glyoxal

Zinc

Methylhydroabietate, diels-alder adducts/Derivatives of abietic esters from rosin
Acrylic resins/Emulsion or solution polymerization to coatings
Acrylic resins (latex)/Emulsion polymerization of acrylonitrile with polybutadiene
Acrylic fibers (85% polyacrylonitrile) by solution polymerization/Wet spinning
Alkyd Resins/Condensation polymerization of phthalic anhydride + glycerin + vegetable oil esters
Benzene/By-product of styrene by ethylbenzene dehydrogenation
Benzene/By-product of vinyl toluene (from ethyltoluene)
n-butyl alcohol/Hydrogenation of n-Butyraldehyde, Oxo process
Coumarin (benz-a-pyrone)/Salicylaldehyde, Oxo process
Cycloparaffins/Catalytic hydrogenation of aromatics in kerosene solvent
Dithiocarbamates, zinc salt/Reaction of zinc oxide + Sodium dithiocarbamates
Dialkyldithiocarbamates, metal salts/Dialkylamines + Carbon disulfide
Dithiocarbamates, metal salts/Dithiocarbamic acid + metal oxide
Thiuram (dimethyldithiocarbamate) hexasulfide/Dimethyldithiocarbamate + sulfur
Fluorescent brighteners/Coumarin based
Ethyl acetate/Redox reaction (Tschienko) of acetaldehyde
Ethylbenzene/Benzene alkylation in liquid phase
Ethylbenzyl chloride/Chloromethylation (Hydrogen chloride + formaldehyde, zinc chloride) of ethylbenzene
2-Ethyl hexanol/Aldol condensation-hydrogenation of n-Butyraldehyde
Glyoxal-urea formaldehyde textile resin/Condensation to N-bis (hydroxymethyl) urea + N,N'-(Dihydroxyethyl) urea
Isobutanol/Hydrogenation of isobutyraldehyde, Oxo process
Isopropanol/Catalytic hydrogenation of acetone
Methallylidene diacetate/Condensation of 2-Methypropenal + acetic anhydride
Methanol/Low pressure sythesis from natural gas via synthetic gas
Methyl chloride/Hydrochlorination of methanol
Methylethyl ketone/Dehydrogenation of sec-Butanol
Naphthenic acid salts
Nylon
Nylon 6 & 66 copolymers/Polycondensation of Nylon salt + Caprolatam
Nylon 6 fiber/Extrusion (melt spinning)
Oxo alcohols, C12-C15/Hydroformylation & hydrogenation of C11-C14 olefins
Phenolic urethan resins/Phenol + excess formaldehyde + Methylene aniline diisocyanate
Polystyrene (crystal) modified/Polystyrene + sulfonation, chloromethylation and/or amination
Rayon/Viscose process
SAN resin/Emulsion polymerization
Silicones: Silicone rubbers/Hydrolysis and condensation of chlorosilanes
Silicones: Silicone specialties (grease, dispersion agents, defoamers & other products)
Silicones: Silicone resins/Hydrolysis & condensation of methyl, phenyl & vinyl chlorosilanes
Silicones: Silicone fluids/Hydrolysis of chlorosilanes to acyclic & cyclic organosiloxanes
Stearic acid, metal salts/Neutralization with a metallic base
Styrene/Dehydrogenation of ethylbenzene
Styrene-butadiene resin/Emulsion polymerization
Vinyl acetate/Reduction of acetylene + acetic acid
Vinyl toluene/Dehydrogenation (thermal) of ethyltoluene
Xylenes, mixed/By-product vinyl toluene (from ethyltoluene)

Cyanide

Acetone cyanohydrin/Acetone + Hydrogen cyanide
Acetonitrile/By-product of acrylonitrile from propylene by ammoxidation
Acrylic resins/Solution polymerization
Acrylic fiber (85% acrylonitrile)/Suspension polymerization, and wet spinning
Acrylic fiber (85% acrylonitrile)/Solution polymerization, and wet spinning
Acrylonitrile/Ammoxidation of propylene
Adiponitrile/Butadiene + Hydrogen cyanide (direct cyanation)
Allylnitrile/Allyl chloride + Sodium cyanide
Dimethoxybenzaldehyde/Hydroquinone dimethyl ether + Hydrogen cyanide, hydrolysis
Benzyl cyanide/Benzyl chloride + Sodium cyanide
Coal tar products/Distillation of coal tar condensate
Cyanoacetic acid/Chloracetic acid + sodium cyanide
Cyanuric chloride/Catalyzed trimerization of cyanogen chloride
Vat dyes, Indigo paste as Vat Blue 1/Sodamide + potassium N-Phenylglycine, fused with caustic/N-phenylglycine + Aniline + Formaldehyde + Sodium bisulfite, sodium cyanide, hydrolysis with potassium hydroxide
Disperse dyes, Azo and Vat
Ethylenediamine tetraacetic acid/Ethylenediamine + Formaldehyde + Sodium cyanide
Diethylenetriamine pentaacetic acid/Diethylenetriamine + Formaldehyde + *Sodium cyanide*
N,N'-bis(o-Acetamidophenol)ethylenediamine, (ferric complex/ Salicyladehyde + Ethylenediamine + Hydrogen cyanide, hydrolysis to amide
Diethylenetriamine pentaacetic acid, pentasodium salt/Diethylenetriamine pentaacetic acide + caustic
Ethylenediamine tetraacetic acid, metal salts/Ethylenediamine tetraacetic acid + metal bases
Hydroxyethyl ethylenediamine triacetic acid, trisodium salt/ Ethylenediamine + Ethylene oxide + Formaldehyde + Sodium cyanide, hydrolysis
Hexamethylene diisocyanate/Hexamethylene diamine (1,6-Diaminohexane) + phosgene
5,5-Dimethyl hyantoin/Acetone + ammonia + carbon dioxide + hydrogen cyanide
Hydrogen cyanide/By-product of acrylonitrile by ammoxidation of propylene
Iminodiacetic acid/Hexamethylene tetraamine + Hydrogen cyanide, hydrolysis of iminoacetonitrile salt
Methionine/Acrolein + Methyl mercaptan, with hydrogen cyanide and ammonium carbonate
Methylene Diphenylisocyanate (MDI)/Phosgenation of methylene dianiline from Aniline + Formaldehyde
Nitrilotriacetic acid/Hexamethylene tetraamine + Hydrogen cyanide, hydrolysis of nitrilotriacetonitrile salt
Picolines, mixed/Condensation of acetaldehyde + formaldehyde + ammonia
Organic pigments, Azo/Diazotization of aniline cogener, coupling to B-Napthol
Polyurethane resins/Diisocyanate + Polyoxyalkylene glycol
Polyurethane fibers (Spandex)/Polyoxyalkylene glycol + Tolylene diisocyanate + dialkylamine
Pyrimidines, 2-Isopropyl-4-methoxy-/Isobutyronitrile + methanol, ammonia and methylacetoacetate (ring closure)
Pyridine (synthetic)/Condensation of *acetaldehyde + ammonia + formaldehyde*
Cyanopyridine/Ammoxidation of picoline
Sarcosine (N-Methyl glycine), sodium salt/Hexamethylene tetraamine + Sodium cyanide, hydrolysis
Thiophene acetic acid/Chloromethylation (Hydrogen chloride + Formaldehyde) + Sodium cyanide, hydrolysis
Tolylene diisocyanate (isomeric mixture)/Tolylene diamines + Phosgene
Tris(anilino)S-triazine/Cyanuric chloride + Aniline and its cogeners
Triethylorthoformate/Ethanol + Hydrogen cyanide
Trimethylorthoformate/Methanol + Hydrogen cyanide

Appendix B to Part 414—Complexed Metal-Bearing Waste Streams

Chromium

Azo dye intermediates/Substituted diazonium salts + coupling compounds
Vat dyes/Mixing purchased dyestuffs (Anthraquinones, polycyclic Quinones and Indigoids)
Acid dyes
Azo dyes, metallized/Azo dye + metal acetate
Acid dyes, Azo (including metallized)
Organic pigments, miscellaneous lakes and toners

Copper

Disperse dyes
Vat dyes/Mixing purchased dyestuffs (Anthraquinones, polycyclic Quinones and Indigoids)
Acid dyes
Direct dyes
Vat dyes
Sulfur dyes
Disperse dye coupler/N-substitution of 2-Amino-4-acetamidoanisole
Azo dyes, metallized/Azo dye + metal acetate
Direct dyes, Azo
Disperse dyes, Azo and Vat
Organic pigment Green 7/Copper phthalocyanine
Organic pigments
Organic pigments/Phthalocyanine pigments
Organic pigments/Copper phthalocyanine (Blue Crude)
Organic pigments, miscellaneous lakes and toners

Lead

Organic pigments, Quinacridines
Organic pigments, Thioindigoids

Nickel

Azo dyes, metallized/Azo dye + metal acetate

Zinc

Organic pigments/Azo pigments by diazotization and coupling

ATTACHMENT D

SAMPLE INFORMATION REQUEST LETTER

INTRODUCTION

To conduct the compliance assessment, information regarding the discharger's manufacturing product/process, annual production rates, wastewater treatment system, water usage, and discharge characteristics is needed. While much of this data may be available in current permit files (e.g., Form 2C, DMR, etc.), other information may need to be requested.

There are a number of techniques to acquire the necessary information including telephone calls, plant inspections, meetings, or written requests. Section 308 of the Clean Water Act authorizes EPA and the States to impose monitoring requirements on any point source discharge so long as the data generation conforms to the criteria of reasonableness. A letter using the §308 authority is an effective way to get production, effluent flow, and discharge quality data from an OCPSF facility which has not submitted sufficient information in its Form 2C, DMR, or in response to the 1983 §308 Survey for the development of the guidelines. A sample information request letter is provided below.

SAMPLE INFORMATION REQUEST LETTER

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

RE: Request for Information Pursuant to Section 308 of the Clean Water Act, Data from OCPSF Facilities

Dear _____ :

As you know, the final rule establishing effluent limitations guidelines for the organic chemicals and plastics and synthetic fibers point source category (the "guidelines") was promulgated on November 5, 1987 and became effective on December 21, 1987. The statutory deadline for permits to incorporate the best practicable control technology currently available (BPT) limit and best available technology economically achievable (BAT) limit is March 31, 1989.

We are providing you a set of worksheet and a practical example in Attachments [C-1] and [C-2], respectively, to estimate the forthcoming permit limits based on the new guidelines. A recent EPA assessment indicated that the majority of OCPSF

facilities currently discharge in levels which would exceed the new BPT and/or BAT guidelines. Based on the assessment, EPA urges the [Permitting Authority] to accelerate compliance with the new guidelines.

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OPTION 1 (To request additional production/monitoring data if the 1983 §308 survey data, the 48 Plant Sampling Database, Form 2C, or DMR is not sufficient to assess compliance with the new guidelines; See Section 4 of the strategy for the purpose of this option.)

Pursuant to section 308 of the Clean Water Act, you are hereby requested to submit the following information and data to the [Permitting Authority]:

(1) Within 30 days from receipt of this letter, submit two lists including the following information for <u>each outfall</u> whose discharge consists of any OCPSF process wastewater:

(i) a list of products subject to OCPSF guidelines, SIC codes for each OCPSF product, annual production (in million pounds per year) of each OCPSF product, measured average* and maximum process waste flow (in million gallons per day) of each OCPSF product, and manufacturing process of each OCPSF product.

(ii) a list of non-OCPSF process wastewaters and other nonprocess wastewaters, flow of each wastewater, BOD5 and total suspended solids (TSS) analyses (consisting of at least _____ grab samples) of each wastewater.

(2) Within 45 days from receipt of this letter, submit a schematic diagram of the existing wastewater treatment processes for OCPSF process wastewaters.

(3) Within 60 days from receipt of this letter, submit most recent (within 12 months) data for concentration (in mg/L) and mass loading (in lbs/day) of the effluent from each outfall given in item (1) above for all BPT and BAT parameters (see Attachment [C-3]). The sample must be representative of daily operations. Where flow-proportioned composite sampling is not feasible, a grab sample is acceptable. The data must include the date, time, and place of sampling, and methods of analysis.

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* Report the long-term average flow, e.g., the highest monthly average flow during the past twelve (12) months or the highest yearly mean of the twelve monthly average flows during the past five (5) years.

OPTION 2	(To request submission of a compliance plan if the OCPSF facility currently discharges pollutant(s) at levels that would exceed the new BPT and/or BAT guidelines as described in Section 7(b))

Pursuant to section 308 of the Clean Water Act, you are hereby requested to submit the following information and data to the [Permitting Authority] for <u>each outfall</u> whose discharge consists of any OCPSF process wastewater:

(1) Within 60 days from receipt of this letter, submit following information to show whether the pollutant levels in your current discharge exceed the new OCPSF effluent limitation guidelines:

(a) a list of products subject to OCPSF-ELG, SIC codes for each OCPSF product, annual production (in million pounds per year) of each OCPSF product, process waste flow* (in million gallons per day) of each OCPSF product, and manufacturing process of each OCPSF product;

(b) a list of non-OCPSF process wastewaters and other nonprocess wastewaters, flow of each wastewater, BOD5 and total suspended solids (TSS) analyses (consisting of at least __ grab samples) of each wastewater;

(c) a schematic diagram of the existing wastewater treatment processes for OCPSF process wastewaters; and

(d) a most recent (within 12 months) data for concentration (in mg/L) and mass loading (in lbs/day)) of the effluent from each outfall given in item (a) above for all BPT and BAT parameters (see Attachment [C-3]). The sample must be representative of daily operations. Where flow-proportioned composite sampling is not feasible, a grab sample is acceptable. The data must include the date, time, and place of sampling, and methods of analysis.

(2) If your discharge exceeds the guidelines, within 90 days from receipt of this letter, submit a compliance plan (including, but not limited to, additional O & M and/or treatment unit upgrade) to bring the effluent into

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* Report the long-term average flow, e.g., the highest monthly average flow during the past twelve (12) months or the highest yearly mean of the twelve monthly average flows during the past five (5) years.

compliance with the new guidelines before the permit is reissued. Provide the shortest compliance schedule for achieving the guidelines. The completion date in this schedule must not be later than the permit expiration date.

The statements reported in Items (1) and (2) must be signed by an authorized representative of the facility, as defined in 40CFR 122.22.

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The legal authority for this request is contained in Attachment [D-1]. All information and data should be submitted to [Address of Permitting Authority].

Furthermore, you are hereby notified that when the existing permit expires, your discharge is expected to be in immediate compliance with the reissued permit which will reflect the new guidelines. If the discharge is not in compliance with the permit upon reissuance, enforcement action will be applied.

Should you have any questions regarding this request, please contact me or [Permit Writer] of my staff at [Tel. No.].

Sincerely,

Chief, Permits Branch

Attachment

(Sample Information Request Letter continued)

ATTACHMENT D-1

AUTHORITY AND CONFIDENTIALITY PROVISIONS

Authority

This request for information is made under authority provided by Section 308 of the Clean Water Act, 33 U.S.C. 1318. Section 308 provides that: "Whenever required to carry out the objective of this Act, ...the Administrator shall require the owner or operator of any point source to (i) establish and maintain such records, (ii) make such reports, (iii) install, use, and maintain such monitoring equipment and methods (including where appropriate, biological monitoring methods), (iv) sample such effluents....and (v) provide such other information as he may reasonable require; and the Administrator or his authorized representative, upon presentation of his credentials, shall have a right of entry to.... any premises in which an effluent source is located or in which any records...are located, and may at reasonable times have access to and copy and records...and sample any effluents...."

Please be advised that the submission of false statements may subject you to federal prosecution under 18 U.S.C. 1001 and that this or any other failure to comply with the requirements of Section 308 as requested by U.S. EPA may result in enforcement action under the authority of Section 309 of the Clean Water Act, which provides for specified civil and/or criminal penalties.

Confidentiality

U.S. EPA regulations concerning confidentiality and treatment of business information are contained in 40 CFR Part 2, Subpart B. Information may not be withheld from the Administrator or his authorized representative because you view it as confidential. However, when requested to do so, the Administrator is required to consider information to be confidential and to treat it accordingly, if disclosure would divulge methods or processes entitled to protection as trade secrets (33 U.S.C. 1318(b) and 18 U.S.C. 1905), <u>except</u> that effluent data (as defined in 40 CFR 2.302(a)(2)) may not be considered by U.S. EPA as confidential.

These regulations provide that you may assert a business confidentiality claim covering part or all of any trade secret information furnished to U.S. EPA at the time such information is

provided to the Agency. The manner of asserting such claims is specified in 40 CFR 2.203(b). In the event that a request is made for release of information covered by your claim of confidentiality or the Agency otherwise decides to make a determination as to whether or not such information is entitled to confidential treatment, notice will be provided to you prior to any release of the information. However, if no claim of confidentiality is made when information is furnished to U.S. EPA, any information submitted to the Agency may be made available to the public without prior notice to you.