04.01-07/17/92-01002

(840) 445-2931

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#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Michelle Glenn Waste Management Division United States Environmental Protection Agency, Region IV 345 Courtland Street, N.E. Atlanta, Georgia 30365

Re: MCB Camp Lejeune Installation Restoration Program; Treatment of TCE Contaminated Groundwater at the Hadnot Point Wastewater Treatment Plant

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#### Dear Ms. Glenn:

As discussed in our meeting on April 28, 1992 aboard Marine Corps Base Camp Lejeune with you and Mr. John Lank, we have finalized a report entitled "Interim Remedial Action Proposed Plan for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit." Our preferred alternative for remediation of the shallow aquifer involves utilizing the Hadnot Point Wastewater Treatment Plant (WTP) to treat chlorinated solvent contaminated groundwater from the Hadnot Point Industrial Area (HPIA) shallow aquifer.

As previously stated in our letter dated 6 April 1992, we assert that the TCE contaminated groundwater in the HPIA shallow aquifer should not be considered a listed hazardous waste. In your letter dated 14 April 1992 you stated that "if wastewater enters a surface impoundment at any time in the treatment process the RCRA regulations would apply (as) an 'Applicable or Relevant and Appropriate Requirement.'"

Nonetheless, in the meeting referenced above Mr. Lank indicated that the 40 CFR 261.3 allows the exclusion of the listed hazardous waste provisions for wastewater, if the generator can demonstrate that the maximum weekly usage of these solvents divided by the average weekly flow of wastewater into the headworks of the wastewater treatment plant does not exceed one (1) part per million (ppm). Although we do not consider the TCEcontaminated groundwater in the HPIA shallow aquifer as "wastewater", an analogy can be drawn between the treatment of contaminated wastewater and contaminated groundwater. As agreed during the referenced meeting, we are providing calculations detailing the theoretical concentrations of chlorinated solvents at the headworks of the Hadnot Point WTP.

Please find enclosed our Chlorinated Solvents Concentration Calculations package, which details Marine Corps Base Camp Lejeune information regarding hazardous material purchases, hazardous waste disposal, and Hadnot Point WTP flows for calendar year 1991. These calculations were prepared in accordance with 40 CFR 261.3. The results of these calculations demonstrate MCB Camp Lejeune potentially has 0.372 ppm of chlorinated solvent in the flow to the wastewater treatment plant. As discussed in the enclosure, this calculation is very conservative, predominantly because all the solvents were assumed to process through the Hadnot Point WTP, rather than being split among the seven (7) wastewater treatment plants aboard the Base. Complete supporting documentation for the enclosure is maintained at MCB Camp Lejeune and available for review.

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More accurate information that strongly supports the enclosed calculations can be found in the report previously submitted to you entitled "Draft Supplemental Document to the Interim Remedial Action Focused Feasibility Study for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit." In Chapter 3 of the above-mentioned document, Table 3-4 reports the results of three (3) 12-hour composite samples of the influent to the Hadnot Point WTP. These composite samples were taken by Baker Environmental, Inc personnel on 4-6 February 1992 to support the Interim Remedial Action Proposed Plan. TCE was detected in only one of these samples at a concentration of one (1) part per billion.

Based on the enclosure and the aforementioned submitted report, the concentration of chlorinated solvent at the headworks of the Hadnot Point WTP during treatment of the contaminated groundwater from the HPIA shallow aquifer should be well below one part per million (ppm). Thus, if an analogy between the treatment of TCEcontaminated wastewater and TCE-contaminated groundwater is made, the treatment of TCE-contaminated groundwater from the HPIA shallow aquifer at the Hadnot Point WTP would be allowable.

In order to maintain our expedited schedule for this action, we request your written confirmation of this interpretation by 29 July 1992. If you have questions or comments, please contact Mr. Byron Brant, MCB Camp Lejeune Remedial Program Manager, at (804) 445-2931.

Sincerely,

P. A. RAKOWSKI, P.E. Head Environmental Programs Branch Environmental Quality Division by direction of the Commander Encl: Chlorinated Solvents Concentrations Calculations Package

- C21121/SIGE

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Copy to: MCB Camp Lejeune (AC/S, Environmental Management) N.C. DEHNR (Attn: Mr. Jack Butler) EPA Region IV, RCRA (Attn: Mr. John Lank)

Blind copy to: (w/ encl) 1823 (BCB)(2 copies) Administrative Record MCB Camp Lejeune

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### MARINE CORPS BASE, CAMP LEJEUNE HADNOT POINT WASTEWATER TREATMENT PLANT CHLORINATED SOLVENT (F001 AND F002) CONCENTRATION CALCULATIONS PACKAGE

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#### CY 1991

Annual Chlorinated Solvent Purchases 878 Gallons Annual Chlorinated Solvent Listed HW Shipped Out for Disposal - 257 Gallons CY 1991 Annual Chlorinated Solvent Usage 621 Gallons

Yearly Average (CY 1991) Hadnot Point Wastewater Plant Flow:

4.575 MGD \* 365 Days/Year = 1670 Million Gallons/Year Solvent Exclusion Calculation:

<u>621 Gallons/Year Chlorinated Solvent</u> =  $3.72 \times 10^{-7}$ 1,670,000,000 Gallons/Year Wastewater

or

.372 parts per million (ppm)

0.372 ppm is a conservative calculation and is substantially below the 1 ppm exclusion limit.

## CONSERVATIVE ASSUMPTIONS UTILIZED IN CALCULATING THE CHLORINATED SOLVENT CONCENTRATION CALCULATIONS PACKAGE

- All chlorinated solvent purchases were included in the calculation.
- Calculations are on an annual basis. Weekly hazardous material purchase information is not readily available and would not reflect actual total weekly usages.
- Listed chlorinated hazardous wastes (F001 and F002) were obtained from the CY 1991 Environmental Protection Agency (EPA) hazardous waste report and combined for the exclusion calculation.
- The HW solvent exclusion calculation was based on not exceeding one part per million, even though several solvent purchases could have been calculated using 25 parts per million.
- Marine Corps Base, Camp Lejeune operates seven separate wastewater treatment plants. For this calculation, all chlorinated solvent usage, after subtracting that disposed of as HW, is assumed to be treated at the Hadnot Point Wastewater Treatment Plant. Actually, chlorinated solvent usage and potential discharge would be split among all seven plants.
- Conversion of listed HW reported on the CY 1991 EPA HW Report from pounds to gallons assumes an average chlorinated solvent density of 11.7 lb/gal.

#### GENERAL INFORMATION FOR THE CALCULATION OF HAZARDOUS MATERIAL IN GALLONS UTILIZED IN CALENDAR YEAR (CY) 1991 ABOARD MARINE CORPS BASE, CAMP LEJEUNE

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CAN = 12 oz

1 PINT = 16 oz

1 DRUM = 55 gal

128 oz = 1 gal

TOTAL GALLONS:

123 (12 oz CANS OF TRICHLOROETHANE) = 11.5 gal

148 (GALLONS of RIFLE BORE CLEANING COMPOUND) = 148 gal

30 (16 oz PINTS OF DEGLAZING SOLVENT) = 3.75 gal

13 (55 GALLON DRUMS OF DRY CLEANING SOLVENT TYPE II) = 715 gal

TOTAL = 878.2 gal

TOTAL = 878 GALLONS

### METHODOLOGY FOR COMPILING THE HAZARDOUS MATERIAL QUANTITY

1. Reviewed Logistics purchasing information for potentially chlorinated compounds.

2. Utilized the Navy computerized Hazardous Material Information System to generate Material Safety Data Sheets (MSDS's) for each potentially chlorinated compound.

3. Utilized MSDS's to screen potentially chlorinated compounds and determine actual chlorinated compounds.

4. Compiled a list of chlorinated solvent purchases.

5. Created a spreadsheet using the CY 1991 chlorinated solvent purchases.

6. Calculated the total gallons of chlorinated Hazardous Material purchased for CY 1991.

### CHLORINATED SOLVENT AVERAGE DENSITY CALCULATIONS

CHLORINATED SOLVENT	SPECIFIC GRAVITY
tetrachloroethylene (perchloroethylene)	1.625
trichloroethylene	1.456
carbon tetrachloride	1.595
chlorobenzene	1.107
methylene chloride	1.335
111 trichloroethane	1.325

Average S.G. = 1.40

# 1.40 \* 8.342 lb/gal water = 11.7 lb/gal Average Chlorinated Solvent Density

Chemical Densities Taken From: Condensed Chemical Dictionary Tenth Edition Revised by Gessner G. Hawley Van Nostrand Reinhold Company, 1981.

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10       AA EN. 10       CAN       1         11       AA EN. 10       CAN       1         BASE MAINTENANCE       CAN       1         10       AA BN, 20 MARDIV       CAN       1         BASE MAINTENANCE       CAN       1       1         BASE MAINTENANCE       CAN       1       1         10       AA BN, 20 MARDIV       CAN       1         11       CAN BN, 20 MARDIV       CAN       1         12       AA BN, 20 MARDIV       CAN       1         11       CAN BN, 20 MARDIV       CAN       1         12       CAN BN, 20 MARDIV       CAN       1         13       MAINTENANCE       CAN       1         14       MAINTENANCE       CAN       1         14       MAINTENANCE       CAN       1         14       MAINTENANCE       CAN       1         14       MAINTENANCE       CAN		-	STAD NEW DIVED		CAN .	
HAR LAN LED MARTIN       CAN         HARE MAINTENANCE       CAN			in an ann an an an Arthur an Ar	• • •	الميلاً مريد مريد وريد	-
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HALL LIMICT       CAN         BASE MAINTENANCE       CAN         HASE MAINTENANCE       CAN         LD AA BN, BD MARDIV       CAN			PYAL ANDALAYAMANA	•	المشتع من المانية. مريد المريد	
HATE MAINTENANCE       CAN       1         HATE MAINTENANCE       CAN       1         LD AA BN, LD MARDIV       CAN       1         HATE MAINTENANCE       CAN       1         HATE MAINTE			STER NETNUENTNUE		Correct of the second s	
LIAL AMERICAN CAN IT LD-AA BN, 2D MARDIV CAN IT BASE MAINTENANCE CAN I LLAARE CLEANING COM MITIGO MITIGO MITIGO MITIGO MITIGO CAL I CAN IT CAN IT C			FLUE VALVOUVANOT		in and in An an an	-
BASE MAINTENANCE CAN 1 BASE MAINTENANCE CAN 1 1144866 CLEANING COM MICLOS GAL 1 MICLOS GAL 1 14 MEU SSG GAL 1 MCAS NEW RIVER GAL 1			STAA EN ST MARTI		5447325 171357	
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SIGA       POFLE BURE       2D FORCE FECON       GAL       1         L14484       GLEANING COM       M10100       GAL       1         M101100       M20100       GAL       1         M20100       M20100       GAL       1         L4 MEU SSG       GAL       1         M2045       NEW RIVER       GAL       1		· · ·	an a		14 a a a a a	<del>-</del> .
LLARRE CLEANING COM. MATIGO MACING MALIGO MACING GAI LA MEU SEG MARINEW RIVER GAI	ĒĒĢ≞	nan an anna an ann an an an an an 19 - 19 - 19 - 19 - 19 - 19 - 19 - 19 19 - 19 -	1D FORCE FERCY		(1A.T.	
MACIBS MACIDS GAL GAL GAL MCAS NEW RIVER GAL	ull4764 -	OLEATING COM.			GAL	-
MONIOS 14 MEU SOG MCAS NEW RIVER GAL 1	$f^{(1)} = e^{-i\phi}$		<u>Maria 2</u> 33			-
LA MEU SON GAL 1 MCAS NEW RIVER GAL 2			Mohlol		GAL	
MCAS NEW RIVER GAL	-		la Meu segeral de la		GAL	
			MCAS NEW RIVER		GAL	

#### (CHLORINATED, SOLVENT, HAZARDOUS, MATERIAL)

	SZALS A STATE CONTRACTOR	<i></i>
	MCAS NEW ALVER	GAL
	- M 0 3 0 2 0 .	GAL I
	WELTAT	GAL
	M20133	GAL
1 - A	SOT. MCB	GAL
	M20133	C: 2 T
	MOSOCA	CAT
·		GAL
	MBL4/6	لتكلف
	<u>M91372</u>	GAL
	_M93060	GAL
	M20198 26 MEU SSG	GAL
	M93060	GAL
	MCAS NEW RIVER	GAL (
	M93060	GAL
	M93060	CAT
	MUNC MALL MCAS CUEDDY DE	CAL
•	AWID MAW MOAD CHERKI FI	GAL
	2D FORCE RECON	GAL
	M27100	GAL
•	8TH COMM BN	GAL
	M12110	GAL
	MCES	GAL
	M12110	GAL
	M20179	GAL
	WRETXM	GAL
	M10170	CAL
		OAL .
	MCAS NEW RIVER	GAL
	M12110	GAL
	ETRY A 17TH ARTY DURHAM, NC	GAL
	W36QZU	GAL
	M12220	GAL
	MWHS MAW MCAS CHERRY PT	GAL
	2D FORCE RECON	GAL
	V10220	CAT
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	an an Anna an Anna an Anna Anna Anna An	(7A
		GAL
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	M11000	GAL
	21 AA EN 18 MARDIN	GAL
	<u>X1110</u>	GAL
	11 BFG 18T 8FG FT ERAGG	GAL
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SITE NAME	U. S. Marine Camp Lejeune.	Corps Base NC 28542-5001		AL MOTEON	1991 Hazardou	s Waste Report
EPA IO NO.	[N <sub>1</sub> C <sub>1</sub> 6][1 <sub>1</sub> 7 <sub>1</sub> 0][	0, 2, 2] [5,8,0]		FORM GM	WASTE GENE MANAG	RATION AND EMENT
INSTRUCTION	NS: Read the detailed in	istructions beginning on page	a 13 of the 199	1 Hazardous Waste R	eport booklet before	completing this
Sec. A. Waste descr Instruction F Trichl	uption Page 15 orotrifluorethan	e/spent solvent		*****		<b></b>
B. EPA hazardous wasle o Page 15	$[F_10_10_12]$		1 <u>A</u> 1	C. State hezardous waste c Page 15		
D, SIC code Page 15	E. Origin code 1	F. Source code Page 17		G. Point of measurement Page 17	H. Form coda Page 17	L RCRA-radioactive Page 17
9,7,1,1	System type IMI INI		7.	L	B121012	2
J. Reported TFI constitue Page 18	ni K. CAS number Page 18 J. J. L.	، لـــا لـــا•لـــل•لـــا	• <u>L_1_</u>	· <u>(N)A</u> ·LJ 2	L	
Sec. A Quantity ger instruction f	nerated in 1990 Page 18 <u>i_tN_A</u> •	Quantity generated in 1991 Page 18 	•10 1 1	Density     19     1	D. Did this site do a waste: treat on on site, or disch Page 19 2 19 2 2 No (5 2 19 2 No (5 1 treated, disposed or reco	any of the following to site, dispose on site, in arge to a sewer/POTV CONTINUE TO SYSTE SXIP TO SEC. III) Yoled on site in 1991
Sec. A. Was any of	this waste shipped off site in 1991?			<u>1 INIA</u> J I		L+•i
Site B. EPA ID No. 1 Page 20	of facility waste was shipped to	C. System type Page 20	shipped to D.	Off-site availability code Page 21	E. Total quantity shipped Page 21	s in 1991
N <sub>1</sub> C <sub>1</sub>	D 0,0,0 6,4,8	4,5,1 MI114	<u>, 1</u>	<u>1</u>	· 	1 12151.
Site E. EPA ID No. 2 Page 20	of facility waste was shipped to	C. System type Page 20	shipped to D.	Off-site availability code Page 21	E. Total quantity shipped Page 21	in 1991
		NA MI		ا		1 1 1 1
Séc. A. Oid new sour IV. Instruction F	vilies in 1991 result in minimization Page 22	of this waste?	OONTINUE TO (THIS FORM IS (	BOX B) COMPLETE)		
B. Acimiy Page 22	C. Other effects Page 22	D. Quantity recycled in 1991 due to Page 23	new activities	E. Activity/production index Page 23	E F.: 1991 Source red Page 24	uction quantity
	_] [] 1 Yes _] [] 2 No		لــا•لــا	<u> </u>		
Comments:				· · · · · · ·		

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Enclosure

CALIENT STENAME U. S. Marine Corps Base Camp Lejeune, NC 28542-5001 EPAID NO. $N_1C_16$ [1,7,0] 0,2,2 [5,8,0] INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 199 Sec. A Waste description Instruction Page 15. Waste oil/freon (Trichloroethylene mixture) de R FPA basardous waste code F, 0,0,2,1 , 1, N, A	FORM GW 91 Hazardous Waste 91 Hazardous Waste Report booklet before completi
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 19 Sec. A Waste description Instruction Page 15. Waste oil/freon (Trichloroethylene mixture) de R. FRA barardous waste code F. 0.0.2.	GM WASTE GENERATION MANAGEMENT 91 Hazardous Waste Report booklet before completi
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 19: Sec. A Waste description Instruction Page 15 Waste oil/freon (Trichloroethylene mixture) de R EPA baraccous waste code F 0.0.2.	91 Hazardous Waste Report booklet before completi
Scc. A Waste description I Instruction Page 15. Waste oil/freon (Trichloroethylene mixture) de R FPA baraccous waste code .F.0.0.2.	
R = FPA harau(lous waste code , F, 0, 0, 2,, N, A)	erived from Hydraulic Test
Page 15	C. Stale hazardous waste coce Page 15
D. SiC code     E. Origin code     1     F. Source code       Page 16     Page 18     Page 17       1917111     System type     MIINA	G. Point of measurement H. Form code Page 17 <u>L</u> <u>B I2 10 12</u> <u>B I2 10 12</u>
J. Reported TRI constituent K. CAS numbers Page 18 Page 18	
CN-SITE SYSTEM 1     CN-SITE SYSTEM 1     ON-SITE SYSTEM 1       On-site system type     Ouantity treated, discossed or recycled on site in 1591     On-site system 1991       M1_1N1A     U     U	
Sec.       A. Was any of this waste shipped off site in 1991?       X t Yes (CONTINUE TO BOX B)         III       Instruction Page 20       Z No (SKIP TO SEC. M)	
Site B. EPA ID No. of facility waste was shipped to C. System type shipped to Page 20	D. Off-site availability code E. Total quantity shipped in 1991 Page 21 Page 21
$[N_1C_1D][0_10_10][6_14_18][4_15_11] (M_11_14_11]$	
Site 6. EPA ID No. of facility waste was shipped to Page 20 Page 20 I I I I I I I I I I I I I I I I I I I	Page 21 Page 21
Sec. A. Did new activities in 1991 result in minimization of this waste?	io Box Bi s complete)
B. Activity C. Other effects D. Quantity recycled in 1991 due to now activities Page 22 Page 23	E. Actimity/production index F. 1991 Source reduction quant Page 23 Page 24
IWI     IVI     IVI     IVI       IWI     IVI     IVI     IVI	
Comments:	
1	Page 10

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•	SITE NAME U. S. Marine Corps Base Camp Lejeune, NC 28542-5001	Civilioum	the second secon	PROTECTION AGENCY
	EPA 10 NO. [N, C, 6] [1, 7, 0] [0, 2, 2] [5, 8, 0]		FORM	WASTE GENERATION AND MANAGEMENT
•	INSTRUCTIONS: Read the detailed instructions beginning on pag	e 13 of the 19	91 Hazardous Waste	Report booklet before completing this t
	Sec. A. Waste description Instruction Page 15 Methylene chloride solvent, spent			
•	B. EPA hazardous wasie code $[F_10_10_12]$ $[N_1A_1]$ Page 15	I. Ai	C. State hazardous waste Page 15	code
	D. SiC code         E. Origin code [1]         F. Source code           Page 16         Page 18         Page 17           [9,7,1,1]         System type         [M] [N] [A]	91	G. Point of measurement Page 17	H. Form code Page 17 LB 12 10 2 1 12 1
•	J. Reported TRI constituent Page 18 Page 18 1.	• <u></u>		
•	Sec. A. Quantity generated in 1990 II Instruction Page 18 II I I I I I I I I I I I I I I I I I I	C. UC Pa	DM Density ige 19	D. Did this site do any of the following to thi waste: treat on site, dispose on site, recy on site, or discharge to a sower/POTW? Page 19
_	CN-SITE SYSTEM 1         On-site system type         Page 19         LMI_INIAI         Sec.         A. Was any of this waste shipped off site in 19917	CN-SITE S On-site syst Page 19 LM	[] 1 Ibə/gəl [] YSTEM 2 em Typə Ouem Al INIAI	2 39 X 2 No (SKIP TO SEC. III)
	III Instruction Page 20 Xo (SKP TO SE	ic. M		
	Dite D. EPAID No. of facility waste was shipped to C. System type Page 20 N. A	shipped to	). Off-site availability code Page 21	E. Total cuantity shipped in 1991 Page 21
	Site B. EPA ID No. of lacility waste was shipped to Page 20 Pa	shipped to C	L] I. Off-site availability code Page 21	E. Total cuantity shipped in 1991 Page 21
ľ	Sec. A. Did new activities in 1991 tesuit in minimization of this waste?	. KOONTINUE TO	5 BOX B)	
	IV     Instruction Page 22     X 2     No       B. Actimity     C. Other effects     D. Quantity recycled in 1991 due to i Page 23       Page 22     Page 23	(THIS FORM IS	COMPLETE) E. Activity/production index Page 23	F. 1991 Source reduction quariiity Page 24
	WI     WI     I     Yes     I     I     I       WI     WI     I     I     Yes     I     I     I			<u></u> .
	Comments:			
				Page 105 of 1

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# PLANT: HADNOT POINT PERMIT #: NC0063029

YEAR: 1991

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NPDES MONITORING DATA MONTHLY AVERAGES

•	SAMPLE MONTH	FLOW	DO DO	CL2	BOD	BOD	TSS	TSS	pH	pH	TEMP	AMMONIA	NITROGEN	PHOS	FECAL	OIL/
	*****	MGD	mg/L	mg/1	mg/L	mg/L	mg/L	mg/L	MIN	MAX	·C	mg/L	mg/L	mg/L	CLNY/	GREASE mg/L
	· · ·	,			·						•	•	•	•	100ML	
	JANUARY	3.993	9.3	1.8	99	9	91	9	6.1	6.8	15	1.966	7 90	· / 0	1 00	0 55
•	FEBRUARY	3.735	9.3	1.8	109	11	81	13	6.3	6.8	15	3 003	11 00	7.0 7 E	1.03	0.55
۰.	MARCH	3.791	9.1	2.2	110	- 9	105	11	6.3	7 2	17	2 307	0 25	2.2	1 24	4.40
. • .	APRIL	4.229	8.8	2.4	116	9	110	-9	6.4	7 0	20	2 966	9.00	-2 1	1 24	0.00
	MAY	4.462	8.1	2.2	108	8	108	6	6 A	6 8	20	2.500	10 00		1.25	0.50
	JUNE	4.447	7.9	2.1	160	10	165	× 8	6 5	0	24	2.010	10.00		1.38	1.45
· .	JULY	5.187	7 9	1 0	177	10	105	· 2	0.5	.0.0	.40	5.528	9.69	3.7	2.95	1.60
•	AUGUST	6.004	7 3	1 6	151	2	100	30	0.0	7.0	~ 27	3.758	9.63	3.3	1.41	1.80
	SEPTEMBER	5.063	7 9	1 7	101	7	100	TÙ	0.5	6.8	27	2.237	6.80	2.4	1.97	1.10
	OCTOBER	1 891	0.0	1 5	140	10	103	11	6.3	7.0	25	2.115	9.28	2.4	1.62	1.90
•	NOVEMBER	- 4.091	0.0	1.0	202	10		14	6.2	2.0	22	2.733	13.20	3.0	1.26	2.90
•	DECEMBER	A AAO	9.4 0.4	1.0	159	14	103	16	6.4	7.6	18	4.685	13.50	3.4	1.27	6.00
•		4.440	2.4	7.0	152	12	100	13	6.4	7.0	16	2.614	12.70	3.1	1.40	10.55
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•		-1.075	0.5	1.9	747	<b></b>	101	1.1	0°• T	1.6	21	3.123	10.22	3.2	1.52	2.95
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	<i>i</i>										1	•		,	A GEC	METRIC
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	* MORE THAN	1 5.87	MGD :				• . · · ·	· · ·		., . <u>.</u>	· · ·	•		2	· · · ·	
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	NH3 LIMIT	C = 19			NH3 T.TM	ሳተ። ለፕጥ ==	22									
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\* LESS THAN 5.87 MGD : BOD LIMIT = 30 NH3 LIMIT = NO LIMIT