

Fact Sheet Attachment 3

City of Petaluma
Reasonable Potential Analysis (RPA)

Beginning		Step 2	Step 3				Step 4	Step 2	Step 3	Step 5	Step 6	Steps 7 & 8	Final Result

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Beginning		Step 2	Step 3					Step 4	Step 2	Step 3	Step 5	Step 6	Steps 7 & 8	Final Result	
	C (µg/L) Lowest (most stringent) Criteria (Enter "No Criteria" for no criteria)	Effluent Data Available (Y/N)?	Are all data points non-detects (Y/N)?	If all data points ND Enter the min detection limit (MDL) (µg/L)	Enter the pollutant effluent detected max conc (µg/L)	If all data points are ND and MinDL<C, interim monitoring is required	Concentration from the effluent (MEC) (MEC= detected max value; if all ND & MDL<C then MEC = MDL)	MEC vs. C 1. If MEC> or =C, effluent limitation is required; 2. If MEC<C, go to Step 5		Are all B data points non-detects (Y/N)?	If all data points ND Enter the min detection limit (MDL) (µg/L)	Enter the pollutant B detected max conc (µg/L)	B vs. C If B>C, effluent limitation is required	7) Review other information in the SIP page 4. If information is unavailable or insufficient: B) the RWQCB shall establish interim monitoring requirements.	RPA Result Reason
Constituent name															
88 Hexachlorobenzene	0.00077	Y	Y	1	All ND, MinDL<C, Go to Step 5				Y	Y	0.4	Y	No detected value of B, Step	No	UD: effluent data and B are ND
89 Hexachlorobutadiene	50	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5		Y	Y	0.7	N	No detected value of B, Step	No	UD:MEC-C & B is ND
90 Hexachlorocyclopentadiene	17,000	Y	Y	5	All ND, MDL<C, MEC=MDL	5	MEC<C, go to Step 5		Y	Y	0.4	N	No detected value of B, Step	No	UD:MEC-C & B is ND
91 Hexachloroethane	8.90	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5		Y	Y	0.6	N	No detected value of B, Step	No	UD:MEC-C & B is ND
92 Indeno(1,2,3-cd)Pyrene	0.049	Y	Y	0.05	All ND, MinDL<C, Go to Step 5				Y	Y	0.04	N	No detected value of B, Step	No	UD: effluent data and B are ND
93 Isophorone	600	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5		Y	Y	0.8	N	No detected value of B, Step	No	UD:MEC-C & B is ND
94 Naphthalene	No Criteria	Y	Y	0.2	No Criteria	No Criteria	No Criteria		Y	Y	0.05	N	No Criteria	No Criteria	Uo
95 Nitrobenzene	1,900	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5		Y	Y	0.7	N	No detected value of B, Step	No	UD:MEC-C & B is ND
96 N-Nitrosodimethylamine	8.10	Y	Y	5	All ND, MDL<C, MEC=MDL	5	MEC<C, go to Step 5		Y	Y	0.8	N	No detected value of B, Step	No	UD:MEC-C & B is ND
97 N-Nitrosodi-n-Propylamine	1.40	Y	Y	5	All ND, MinDL<C, Go to Step 5				Y	Y	0.8	N	No detected value of B, Step	No	UD: effluent data and B are ND
98 N-Nitrosodiphenylamine	16	Y	Y	1	All ND, MDL<C, MEC=MDL	1	MEC<C, go to Step 5		Y	Y	0.7	N	No detected value of B, Step	No	UD:MEC-C & B is ND
99 Phenanthrene	No Criteria	Y	Y	0.05	No Criteria	No Criteria	No Criteria		Y	Y	0.03	N	No Criteria	No Criteria	Uo
100 Pyrene	11,000	Y	Y	0.05	All ND, MDL<C, MEC=MDL	0.05	MEC<C, go to Step 5		Y	Y	0.03	N	No detected value of B, Step	No	UD:MEC-C & B is ND
101 1,2,4-Trichlorobenzene	No Criteria	Y	Y	5	No Criteria	No Criteria	No Criteria		Y	Y	0.6	N	No Criteria	No Criteria	Uo
102 Aklrin	0.00014	Y	Y	0.005	All ND, MinDL<C, Go to Step 5				Y	Y	0.003	Y	No detected value of B, Step	No	UD: effluent data and B are ND
103 alpha-BHC	0.013	Y	Y	0.01	All ND, MDL<C, MEC=MDL	0.01	MEC<C, go to Step 5		Y	Y	0.003	N	No detected value of B, Step	No	UD:MEC-C & B is ND
104 beta-BHC	0.046	Y	N		0.02		MEC<C, go to Step 5		Y	Y	0.004	N	No detected value of B, Step	No	UD:MEC-C & B is ND
105 gamma-BHC	0.063	Y	Y	0.01	All ND, MDL<C, MEC=MDL	0.01	MEC<C, go to Step 5		Y	Y	0.003	N	No detected value of B, Step	No	UD:MEC-C & B is ND
106 delta-BHC	No Criteria	Y	Y	0.005	No Criteria	No Criteria	No Criteria		Y	Y	0.002	N	No Criteria	No Criteria	Uo
107 Chlordane (303d listed)	0.00059	Y	Y	0.02	All ND, MinDL<C, Go to Step 5				Y	Y	0.005	Y	No detected value of B, Step	No	UD: effluent data and B are ND
108 4,4'-DDT (303d listed)	0.00059	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.003	Y	No detected value of B, Step	No	UD: effluent data and B are ND
109 4,4'-DDE (linked to DDT)	0.00059	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.002	Y	No detected value of B, Step	No	UD: effluent data and B are ND
110 4,4'-DDD	0.00084	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.002	Y	No detected value of B, Step	No	UD: effluent data and B are ND
111 Dieldrin (303d listed)	0.00014	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.002	Y	No detected value of B, Step	No	UD: effluent data and B are ND
112 alpha-Endosulfan	0.0087	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.002	N	No detected value of B, Step	No	UD: effluent data and B are ND
113 beta-Endosulfan	0.0087	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.002	N	No detected value of B, Step	No	UD: effluent data and B are ND
114 Endosulfan Sulfate	240	Y	N		0.01		MEC<C, go to Step 5		Y	Y	0.002	N	No detected value of B, Step	No	UD:MEC-C & B is ND
115 Endrin	0.0023	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.002	N	No detected value of B, Step	No	UD: effluent data and B are ND
116 Endrin Aldehyde	0.81	Y	Y	0.01	All ND, MDL<C, MEC=MDL	0.01	MEC<C, go to Step 5		Y	Y	0.002	N	No detected value of B, Step	No	UD:MEC-C & B is ND
117 Heptachlor	0.00021	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.003	Y	No detected value of B, Step	No	UD: effluent data and B are ND
118 Heptachlor Epoxide	0.00011	Y	Y	0.01	All ND, MinDL<C, Go to Step 5				Y	Y	0.003	Y	No detected value of B, Step	No	UD: effluent data and B are ND
119-121 PCBs sum (2)	0.00017	Y	Y	0.1	All ND, MinDL<C, Go to Step 5				Y	Y	0.03	Y	No detected value of B, Step	No	UD: effluent data and B are ND
126 Toxaphene	0.00020	Y	Y	0.5	All ND, MinDL<C, Go to Step 5				Y	Y	0.4	Y	No detected value of B, Step	No	UD: effluent data and B are ND
Tributyltin	0.00740	Y	Y	0.002	All ND, MDL<C, MEC=MDL	0.002	MEC<C, go to Step 5		Y	Y	0.00128	N	No detected value of B, Step	No	UD:MEC-C & B is ND
Total PAHs	15.00000	Y	Y	0.3	All ND, MDL<C, MEC=MDL	0.3	MEC<C, go to Step 5		Y	Y	0.17	N	No detected value of B, Step	No	UD:MEC-C & B is ND

a. The most stringent of salt and fresh water criteria were selected for this analysis.

b. According to Table 1 of Section b)(1) of CTR (40CFR 131.38), those criteria should use Basin Plan objectives; criteria for Se and CN are specified by the NTR.

c. Criteria for copper is taken from CTR. CTR criteria for copper is expressed as dissolved metals. The copper criterion in the table is adjusted by dividing a factor of 0.83 to convert the dissolved to total metal concentration.

The freshwater criteria for Selenium is taken from NTR.

d. Acronyms in the "Final Result" column:

Uo: Cannot determine reasonable potential due to the absence of data, or because Minimum DL is greater than water quality objective or CTR criteria
IM: Interim monitoring is required