DATA TRACKING AND TECHNICAL FACT SHEET
WPED PRETREATMENT PERMIT REISSUANCE

APPLICANT	Covidien Limited Partnership
PERMIT NO.	SP0002026
APPLICATION NO.	201502864
DATE APPLICATION RECEIVED	April 24, 2015
LOCATION ADDRESS	195 McDermott Road North Haven, CT 06473
FACILITY CONTACT	Jen Shea Office Phone: 203-492-5028 Email: jen.shea@medtronic.com
MAILING ADDRESS	195 McDermott Road North Haven, CT 06473
DMR CONTACT	Jen Shea Office Phone: 203-492-5028 Email: jen.shea@medtronic.com
PERMIT TERM	5 Years
PERMIT CATEGORY	PRETREATMENT SIGNIFICANT INDUS USER (SIU) PRETREATMENT CATEGORICAL (CIU)
SIC CODE(S)	3841: Surgical and Medical Instruments and Apparatus 3842: Orthopedic, Prosthetic, and Surgical Appliances and Supplies
PERMIT TYPE	Reissuance
OWNERSHIP	Private
PUBLICLY OWNED TREATMENT WORKS THAT RECEIVES THE DISCHARGE	Town of North Haven Water Pollution Control Facility ("WPCF") via its collection system. The WPCF discharges to the Quinnipiac River in accordance with NPDES Permit No. CT0100404.
DEEP STAFF ENGINEER	Laura Gaughran
TENTATIVE DECISION FACT SHEET DATE	June 15, 2020

SOLVENT MANAGEMENT PLAN

Is the facility operating under an approved solvent management plan ("SMP")? ☒ Yes ☐ No ☐ N/A
The SMP approval was issued on June 12, 2020.

PERMIT FEES

Application Fee:

Filing Fee	Cost: $1,300.00	Date Paid: April 28, 2015
Processing Fee	Cost: $22,550.00	Date Paid: June 11, 2015

Annual Fee:

Wastewater Category (per 22a-430-7)	Maximum Gallons Per Day ("GPD") or Category	DSN	Annual Fee (per 22a-430-7)
*Organic Chemicals Manufacturing (>50,000 GPD)**	80,000 and 2,600	201-1 and 203-1	$8,425.00
Metal Finishing (to POTW) (0-10,000GPD)	6,000	202-1	$4,337.50
Laboratory Wastewaters (5,000-100,000 GPD)	----	204-1	$4,337.50
	----	205-1	
	----	206-1	
		Total	**$17,100**

*DSN 203-1 is closer in makeup to DSN 201-1 as they both involve polymer operations. DSN 203-1 falls under 40 CFR 463.26 Plastic Molding and Forming Point Source Category: Subpart B – Cleaning Water Subcategory: Pretreatment Standards for New Sources.

I. APPLICANT

On April 24, 2015 the Department of Energy and Environmental Protection received an application (Application No. 201502864) from Covidien Limited Partnership seeking renewal of Permit No. SP0002026 authorizing the discharge of wastewater associated with Polymer Development and Braid Manufacturing, Needle Manufacturing, Molding Polymer Clip Washing, and Laboratory Wastewater at its facility in North Haven. This application was public noticed in the New Haven Register on April 15, 2015. On October 5, 2015, the application was determined to be timely and administratively sufficient.

II. NATURE OF THE BUSINESS GENERATING THE DISCHARGE

The applicant seeks authorization for the following:

DSN	Proposed Average Monthly Flow (GPD)	Proposed Maximum Daily Flow (GPD)	Proposed Wastestreams	Treatment Type	Discharge To
201-1	*Polymer Development and Braid Manufacturing*			Flow-Through continuous pH neutralization through three tanks. Tank 1: Mixer, Magnesium/Calcium Hydroxide, pH probe Tank 2: Mixer, Magnesium/Calcium Hydroxide, optional Acid/Caustic Addition, pH probe Tank 3: Mixer, pH probe	WPCF
	2,700	5,750	Monomer Operations		
	2,000	3,000	Crystallizer / Solvent Recovery Operations		
	1,530	3,480	Polymer Operations		
	2,220	4,840	Spinning		
	1,500	3,100	Braiding		
	12,000	24,000	Monofilament		
	7,500	15,000	Wet Scrubber Overflow		
	280	500	Hemostatic Patch		
	1,370	2,100	First Floor Labs / Research Areas		
	1,300	2,600	Second Floor Labs / Research Areas		
	33,925	65,770	Total		
	40,000	80,000	Permitted Limits		
202-1	*Needle Manufacturing*			Batch-Flow using an initial collection tank before flowing to a treatment tank for pH neutralization. Treatment Tank: Mixer, Acid/caustic addition, pH probe *This wastestream goes through additional treatment for Hexavalent Chromium prior to comingling with other wastestreams within the initial collection tank. This treatment includes pH adjustment, pre-filtration, and Ion Exchange	WPCF
	-	1,000	Tumble and Rinse		
	-	1,000	Needle Pre-Clean		
	-	700	Ultrasonic Needle Cleaning		
	-	700	Lewis Cleaning System		
	-	200	Micro-Etch		
	-	1,600	Poligrat Electropolishing System		
	-	100	Biosurgery Barriers and Sealants		
	-	700	Needle Pre-Clean ("NED") Electropolishing Systems*		
	----	6,000	Total / Permitted Limits		
203-1	400	2,600	*Molding Polymer Clip Washing*	N/A	WPCF

DSN	Proposed Average Monthly Flow (GPD)	Proposed Maximum Daily Flow (GPD)	Proposed Wastestreams	Treatment Type	Discharge To
			Includes wastewater from rinsing excess sodium bicarbonate with city water		
	----	2,600	Permitted Limits		
204-1	-	-	*Laboratory Wastewater from the Main Building* Includes wastewater from Research, Quality Assurance and Quality Laboratory Testing, and Research & Development Reliability Laboratory – Simulated Medical Device Washers	N/A	WPCF
	----	----	Permitted Limits		
205-1	-	-	*Laboratory Wastewater from the Office Building* Includes wastewater from Research, Quality Assurance and Quality Control Laboratory Testing	N/A	WPCF
	----	----	Permitted Limits		
206-1	-	-	*Laboratory Wastewater from the Needles Building* Includes wastewater from Research, Quality Assurance and Quality Control Laboratory Testing	N/A	WPCF
	----	----	Permitted Limits		

III. BACKGROUND/PERMIT HISTORY

Covidien Limited Partnership is a business that manufactures synthetic and bio-absorbable surgical sutures and stainless steel. The treatment systems are used to treat wastewater from the Polymer Development and Braid Manufacturing Facility and the Needle Manufacturing Facility. All wastewater is discharged to Town of North Haven Water Pollution Control Facility ("WPCF") by way of DSN 201-1, 202-1, 203-1, 204-1, 205-1, and 206-1 under this proposed permit.

Compliance/Enforcement

A Violations Report, that covers the previous 5 years, can be found on the last page of this document.

Is the Permittee subject to an ongoing enforcement action? ☐ Yes ☑ No

Does the Permit contain a compliance schedule? ☑ Yes ☐ No

The compliance schedule requires the submission of (1) as-built plans, specifications, and operation and maintenance procedure(s) for the treatment system modifications installed in accordance with Wastewater Treatment System and Process Modification Application Nos. 201908568 and 201908569 which were approved by the Department on October 8, 2019, and (2) analytical data that represents the effectiveness of the treatment.

If yes, please check all that apply.

☑ Pollution Prevention ☐ Water Conservation ☐ Remediation

☐ Water Quality Requirement ☑ Treatment Requirement ☐ Other

Modifications

Within the last five years, have there been any permit modifications? ☐ Yes ☑ No

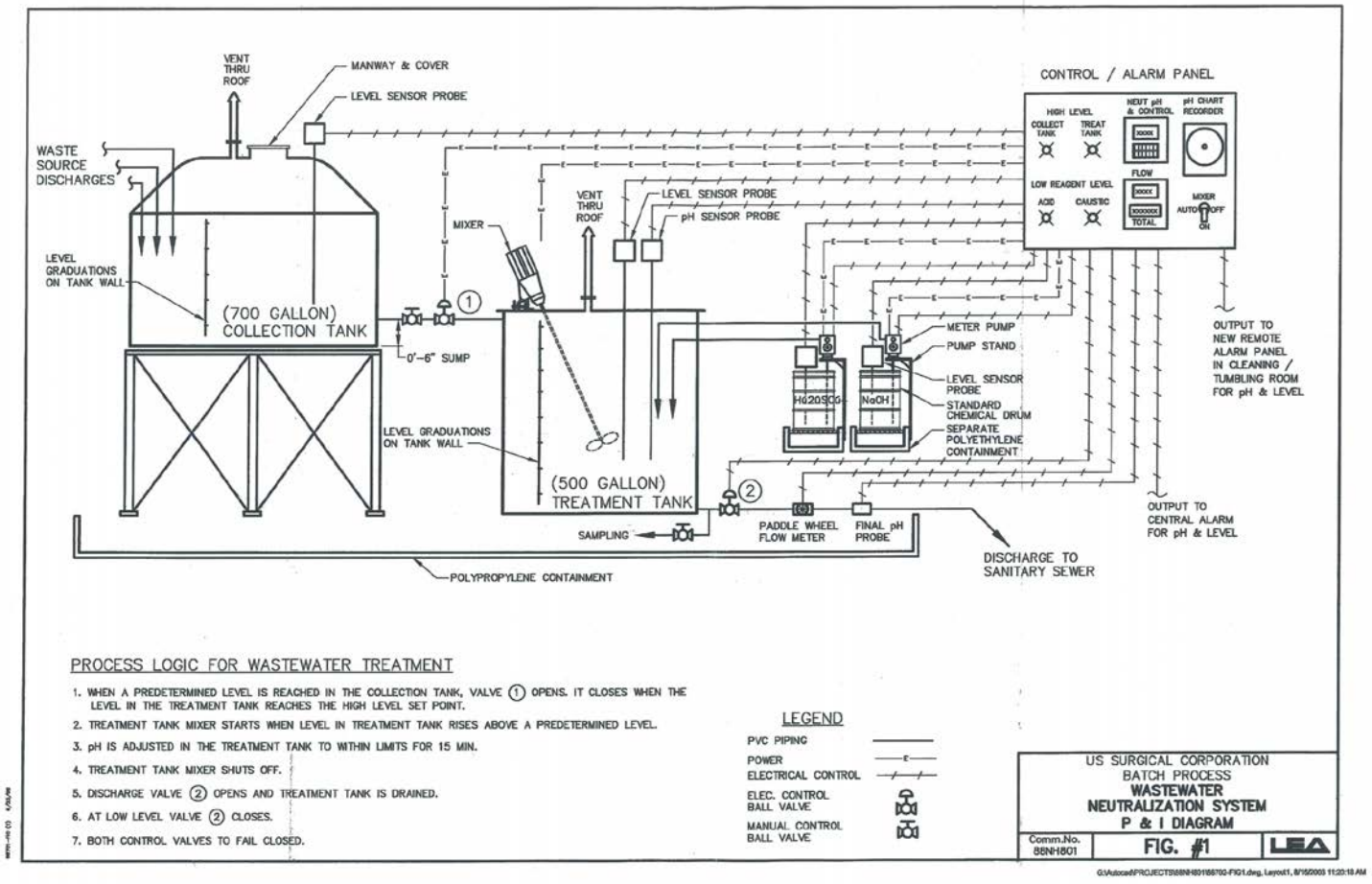
However, the proposed permit includes Hexavalent Chromium as a Monitoring Parameter for DSN 202-1.

Application Nos. 201908568 and 201908569 were submitted as one physical application. The application was submitted under the RCSA sections 22a-430-3(i)(2) and 22a-430-3(i)(3), respectively, and given two application numbers to correspond with each applicable regulation. The application requested authorization to (1) add oxalic acid rinsewater as a new source of wastewater; (2) segregate the new oxalic acid rinsewater from the needle pre-clean electropolishing ("NED") system wastewater, and treat using the existing wastewater treatment system; (3) install a new pH adjustment, pre-filtration, and ion exchange treatment system for treatment of NED wastewater (excluding the oxalic acid rinsewater), install a new lift station for conveyance of NED system wastewater to the new pH adjustment, pre-filtration, and ion-exchange treatment (under the condition that the treatment system cannot be operated until the permit is modified to contain Hexavalent chromium); and (4) remove the future Poligrat Electropolishing System, as the facility no longer intends to install a future unit (proposed within Permit Renewal Application 201502864).

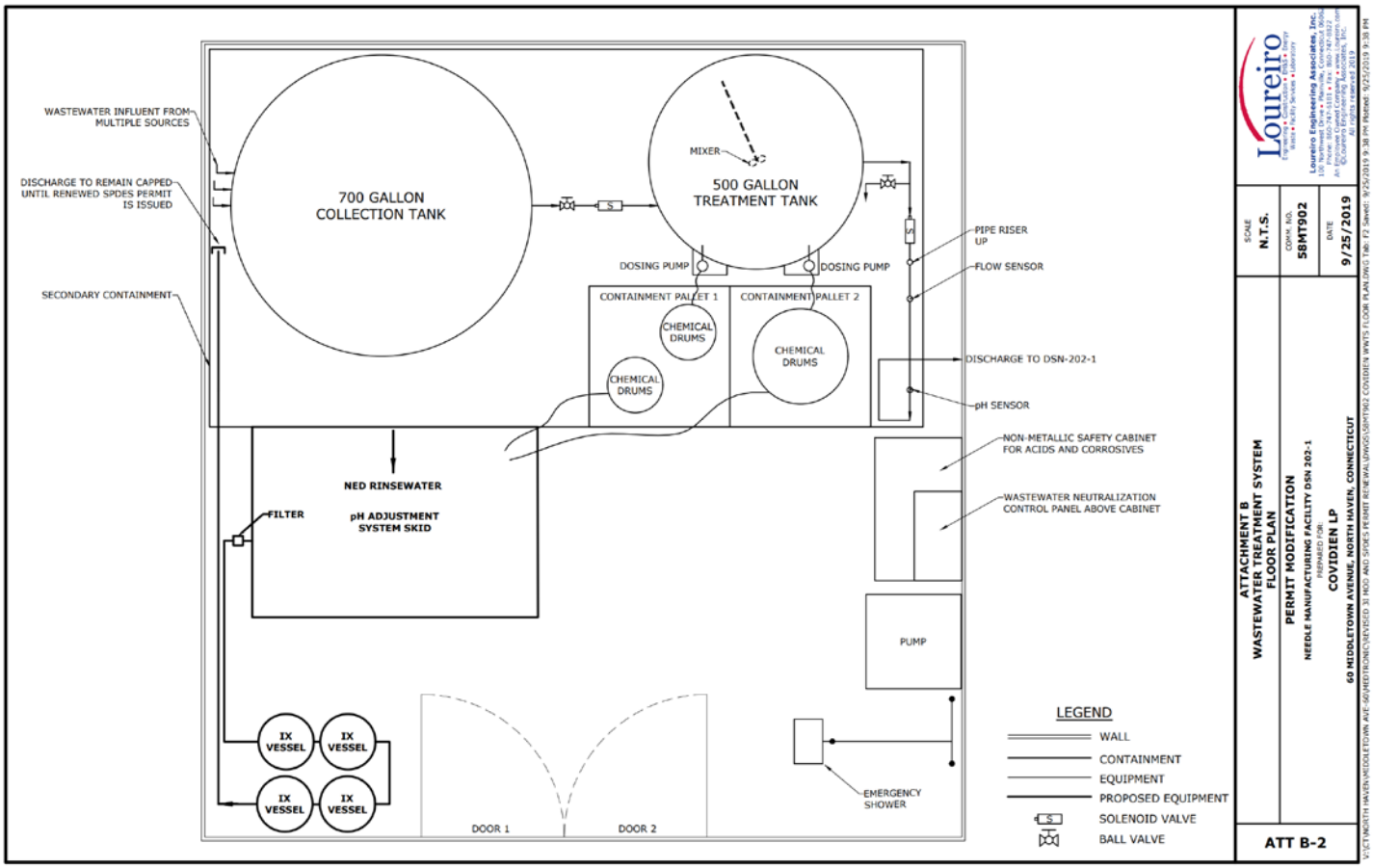
IV. THE ON-SITE WASTEWATER TREATMENT SYSTEM

Refer to the narrative description of the treatment provided for DSNs 201-1 and 202-1 in Part II of this fact sheet.

DSN 201-1



DSN 202-1



V. EFFLUENT GUIDELINES

The wastewater is subject to:

40 CFR 403 General Pretreatment Regulations for Existing and New Sources of Pollution for all discharges

40 CFR 414.46 Organic Chemicals, Plastics, and Synthetic Fibers: Subpart D – Thermoplastic Resins: Pretreatment Standards for New Sources, incorporating 40 CFR 414.111 by reference, for DSN 201-1

40 CFR 433.17 Metal Finishing Point Source Category: Subpart A – Metal Finishing Subcategory: Pretreatment Standards for New Sources and the RCSA section 22a-430-4(s)(2) for DSN 202-1

40 CFR 463.26 Plastic Molding and Forming Point Source Category: Subpart B – Cleaning Water Subcategory: Pretreatment Standards for New Sources for DSN 203-1

VI. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		REGULATION	DISCHARGE POINT(S)
☒	Federal Effluent Limitation Guideline ("ELG")	40 CFR 403	All
☐	Pretreatment Standards for Existing Sources ("PSES")		
☒	Pretreatment Standards for New Sources ("PSNS")	40 CFR 414.46 and 414.111, 40 CFR 433.17, 40 CFR 463.26 (respectively)	201-1, 202-1, 203-1 (respectively)
☐	Performance Standards		
☒	Section 22a-430-4(s) of the Regulations of Connecticut State Agencies ("RCSA")	Sec. 22a-430-4(s)(2)	202-1
☒	Case-by-Case Determination using Best Professional Judgment ("BPJ")	RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	201-1, 202-1, 203-1, 204-1, 205-1, 206-1
☒	Other (i.e. Department File Information)		201-1, 202-1, 203-1, 204-1, 205-1, 206-1

A. MONITORING PARAMETERS & LIMITS:

In Connecticut, all discharges must comply, at a minimum, with the general prohibitions of the federal pretreatment standards and section 22a-430-4(t) of the RCSA. State-issued pretreatment permits utilize federal categorical and state regulatory standards and effluent limitations to assure such compliance is achieved. In cases where there exists a site-specific risk for a pollutant to have a negative impact on receiving waters and/or the POTW's operations including sludge handling or disposal, worker health or safety, or ability to comply with its own NPDES permit, state permits may incorporate local limits.

DSN 201-1

PARAMETER	40 CFR 414.46		Permit Limits/BPJ		
	Average Monthly (µg/L)	Maximum Daily (µg/L)	Average Monthly (µg/L)	Maximum Daily (µg/L)	Instantaneous (µg/L)
Acenaphthene	**19**	**47**	19	47	**70.**
Anthracene	**19**	**47**	19	47	**70.**
Benzene	**57**	**134**	57	134	**201**
Bis(2-ethylhexyl) phthalate	**95**	**258**	95	258	**387**
Carbon Tetrachloride	**142**	**380**	142	380	**570**
Chlorobenzene	**142**	**380**	142	380	**570**
Chloroethane	**110**	**295**	110	295	**442**
Chloroform	**111**	**325**	111	325	**487**

PARAMETER	40 CFR 414.46		Permit Limits/BPJ		
	Average Monthly (µg/L)	Maximum Daily (µg/L)	Average Monthly (µg/L)	Maximum Daily (µg/L)	Instantaneous (µg/L)
Di-n-butyl phthalate	20	43	20	43	64
1,2-Dichlorobenzene	196	794	196	794	1,190
1,3-Dichlorobenzene	142	380	142	380	570
1,4-Dichlorobenzene	142	380	142	380	570
1,1-Dichloroethane	22	59	22	59	88
1,2-Dichloroethane	180	574	180	574	861
1,1-Dichloroethylene	22	60	22	60	90.
1,2-trans-Dichloroethylene	25	66	25	66	99
1,2-Dichloropropane	196	794	196	794	1,190
1,3-Dichloropropylene	196	794	196	794	1,190
Diethyl phthalate	46	113	46	113	169
Dimethyl phthalate	19	47	19	47	70.
4,6-Dinitro-o-cresol	78	277	78	277	415
Ethylacetate	NA	NA	NA	NA	----
Ethylbenzene	142	380	142	380	570
Flow, Day of Sampling (GPD)	NA	NA	NA	80,000	NA
Flow, Maximum during a 24-hour period (GPD)	NA	NA	NA	80,000	NA
Flow Rate (Average Daily) (GPD)	NA	NA	40,000	NA	NA
Fluoranthene	22	54	22	54	81
Fluorene	19	47	19	47	70.
Formaldehyde	NA	NA	NA	----	NA
Hexachlorobenzene	196	794	196	794	1,190
Hexachlorobutadiene	142	380	142	380	570
Hexachloroethane	196	794	196	794	1,190
Methyl Chloride	110	295	110	295	442
Methylene Chloride	36	170	36	170	250
Naphthalene	19	47	19	47	70.
Nitrobenzene	2,237	6,402	2,237	6,402	9,603
2-Nitrophenol	65	231	65	231	346
4-Nitrophenol	162	576	162	576	864
Oil Petroleum, Total Recoverable (mg/l)	NA	NA	NA	NA	100
pH, Day of Sampling (S.U.)	NA	NA	NA	NA	5.5-10.5
pH, Continuous (S.U.)	NA	NA	NA	NA	5.5-10.5
Phenanthrene	19	47	19	47	70.
Pyrene	20	48	20	48	72
Suspended Solids, Total	NA	NA	NA	----	NA
Tetrachloroethylene	52	164	52	164	246
Tin	NA	NA	NA	----	NA
Toluene	28	74	28	74	110
Total Cyanide	420	1,200	420	1,200	1,800
Total Lead	320	690	320	690	1,000
Total Zinc	1,050	2,610	1,050	2,610	3,910
1,2,4-Trichlorobenzene	196	794	196	794	1,190
1,1,1-Trichloroethane	22	59	22	59	88
1,1,2-Trichloroethane	32	127	32	127	190.
Trichloroethylene	26	69	26	69	100
Vinyl Chloride	97	172	97	172	258

DSN 202-1

PARAMETER	40 CFR 433.17		RCSA section 22a-430-4(s)(2)			Permit Limits / BPJ		
	Average Monthly (mg/L)	Maximum Daily (mg/L)	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)
Cadmium, Total	0.26	0.69	**0.07**	**0.11**	**NA**	0.07	0.11	0.16
Chromium, Hexavalent	NA	NA	**0.1**	**0.2**	**0.3**	0.1	0.2	0.3
Chromium, Total	1.71	2.77	**1.0**	**2.0**	**3.0**	1.0	2.0	3.0
Copper, Total	2.07	3.38	**1.0**	**2.0**	**3.0**	1.0	2.0	3.0
Cyanide, Total	0.65	1.20	**0.65**	**1.2**	**NA**	0.65	1.2	1.8
Flow, Day of Sampling	NA	NA	NA	NA	NA	**NA**	**6,000**	**NA**
Flow, Maximum during a 24-hr period	NA	NA	NA	NA	NA	**NA**	**6,000**	**NA**
Flow Rate (Average Daily)	NA	NA	NA	NA	NA	**----**	**NA**	**NA**
Lead, Total	0.43	0.69	**0.1**	**0.5**	**0.75**	0.1	0.5	0.75
Nickel, Total	2.38	3.98	**1.0**	**2.0**	**3.0**	1.0	2.0	3.0
pH, Day of Sampling	NA	NA	NA	NA	NA	**NA**	**NA**	**5.5-10.5**
pH, Maximum	NA	NA	NA	NA	NA	**NA**	**NA**	**10.5**
pH, Minimum	NA	NA	NA	NA	NA	**NA**	**NA**	**5.5**
Silver, Total	0.24	**0.43**	**0.1**	0.5	0.75	0.1	0.43	**0.64**
Zinc, Total	1.48	2.61	**1.0**	**2.0**	**3.0**	1.0	2.0	3.0
Total Toxic Organics	NA	**2.13**	NA	NA	NA	NA	2.13	**2.13**

DSN 203-1

PARAMETER	40 CFR 463.26		Permit Limits/BPJ		
	Average Monthly (mg/L)	Maximum Daily (mg/L)	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)
Flow, Day of Sampling	NA	NA	**NA**	**2,600**	**NA**
pH, Day of Sampling	NA	NA	**NA**	**NA**	**5.5-10.5**

DSN 204-1

PARAMETER	Permit Limits/BPJ		
	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)
Copper, Total	**NA**	**2.0**	**3.0**
pH, Day of Sampling	**NA**	**NA**	**5.5-10.5**
Zinc, Total	**NA**	**2.0**	**3.0**

DSN 205-1 and DSN 206-1 are not given specific limitations within the proposed permit as the discharges are non-categorical laboratory sink rinses with pollutants of concern identified as "Believed Absent" in Attachment O of the permit application. Monitoring Tables E and F contain the condition that the discharge cannot contain concentrated solutions or first rinses.

B. COMMENTS ON SPECIFIC PARAMETERS:

Instantaneous limits calculated using BPJ were created by multiplying the Maximum Daily Limit by 1.5, in accordance with standard practices, as demonstrated in the RCSA section 22a-430-4(s)(2). All Maximum Instantaneous Limits that are multiplied by 1.5 are rounded down to the appropriate significant digit.

Monitoring requirements are written in accordance with the RCSA section 22a-430-3(j)(1), which requires that all permittees shall monitor their discharges by such means as the commissioner determines are appropriate to assure compliance with their permit limitations, standards and conditions.

Monitoring frequencies from the RCSA section 22a-430-3 Monitoring Schedule* were considered in conjunction with monitoring frequencies present in the previous permit, and with 40 CFR 403.12(e), which requires a minimum monitoring frequency of semi-annually.

*Organic Chemicals Manufacturing (>50,000 GPD), Weekly; Metal Finishing (to POTW) (0-10,000GPD), Twice per Month; Laboratory Wastewaters (5,000-100,000 GPD), Twice per Month

All sample types for Instantaneous Monitoring are consistent with the RCSA section 22a-430-2(s)(2) Footnote(2), and standard practices.

Daily Composite Sampling is required for certain parameters in accordance with the RCSA section 22a-430-4(c)(20) and 40 CFR 403.12(g)(3).

DSN 201-1

pH

Limits from the previous permit are in place in accordance with standard practices and the RCSA section 22a-430-4(l)(4)(D)(vi). A pH range of 5.5 to 10.5 S.U. is considered protective of sanitary sewer systems.

Flow

Limits are in place that correspond with average and maximum projected discharges from the wastewater generating activities.

Oil Petroleum, Total Recoverable (previously named "Oil & Grease, hydrocarbon, total petroleum")

Limits are in place in accordance with the EPA's "Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works" (EPA 440/1-75/066) which establishes a limit of 100 mg/l of oil and grease of petroleum or mineral origin.

Ethyl acetate, Formaldehyde, and Tin

Limits and conditions are maintained from the previous permit in accordance with the RCSA section 22a-430-4(l)(4)(D)(vi).

All Other Parameters

All other parameters come from 40 CFR 414.46, which allows for monitoring waivers in accordance with 40 CFR 403.7 and 403.13. Concentration-based limits will be maintained from the previous permit, as well as the sampling types and monitoring frequencies in accordance with the RCSA section 22a-430-4(l)(4)(D)(vi).

The previous permit also included the mass/day allowed for each of these parameters. This was most likely done to comply with 40 CFR 414.111(a) which says "Any point source subject to this subpart must achieve discharges not exceeding the quantity (mass) determined by multiplying the process wastewater flow subject to this subpart times the concentration listed in the following table."
This proposed permit does not contain mass per day limits because by regulating the discharge with both; limits on flow, and limits on each parameter, the proposed permit limits ensure that the point source subject to the subpart must achieve discharges not exceeding the quantity (mass) determined by multiplying the process wastewater flow subject to this subpart times the concentration listed.

This use of concentration-based limits is allowable under the "Pretreatment Streamlining Rule", which allows for flexibility to control OCPSF discharges through equivalent concentration-based limits in lieu of flow-based mass limits (40 CFR 403.6(c)(6)). Use of concentration-based limits in lieu of mass-based limits is contingent upon dilution not being used to meet the limits. The permit will now only include concentration-based limits; this discharge does not include any diluting wastestreams.

DSN 202-1

Cadmium, Total; Chromium, Hexavalent; Chromium, Total; Copper, Total; Cyanide, Total; Lead, Total; Nickel, Total; Silver, Total; Zinc, Total; and Total Toxic Organics

Limits in place are in accordance with the most stringent limit present within the RCSA section 22a-430-4(s)(2) and 40 CFR 433.17, and the previous permit in accordance with the RCSA section 22a-430-4(l)(4)(D)(vi).

Flow

Limits are in place that correspond with average and maximum projected discharges from the wastewater generating activities.

pH

Limits are in place in accordance with standard practices. A pH range of 5.5 to 10.5 S.U. is considered protective of sanitary sewer systems.

DSN 203-1

This discharge previously contained the monitoring parameter Copper, Total. Due to the nature of the discharge over the previous five years with reported data having an average of 0.016 mg/l, and a maximum of 0.08 mg/l, and the absence of metals used in the process, this parameter was removed.

This discharge previously contained the monitoring parameter Zinc, Total. Due to the nature of the discharge over the previous five years with reported data having an average of 0.018 mg/l, and a maximum of 0.09 mg/l, and the absence of metals used in the process, this parameter was removed.

Flow

Limits are in place that correspond with average and maximum projected discharges from the wastewater generating activities.

pH

Limits are in place in accordance with standard practices. A pH range of 5.5 to 10.5 S.U. is considered protective of sanitary sewer systems.

DSN 204-1

Copper, Total, and Zinc, Total

These monitoring parameters are maintained in the permit due to their continued presence in the discharge at values greater than 0.1 mg/l.

Limits are maintained from the previous permit in accordance with the RCSA section 22a-430-4(l)(4)(D)(vi).

Sampling Frequencies are maintained from the previous permit as (1) the discharge is not categorical, (2) there are no reported exceedances in the previous five years for this discharge, and (3) both parameters have reported averages that are under 0.3 mg/l.

pH

Limits are in place in accordance with standard practices. A pH range of 5.5 to 10.5 S.U. is considered protective of sanitary sewer systems.

VII. PERMITS FOR OTHER DISCHARGES

Covidien Limited Partnership is also authorized to discharge under the following:

Stormwater Industrial Activities General Permit – GSI001416
Vehicle Maintenance Wastewater General Permit – GVM001437
Miscellaneous Sewer Discharges General Permit – CTMIU0007

VIII. COMMENTS RELATED TO THE PUBLIC NOTICE

Laura Gaughran was assigned this application on May 23, 2019.

Covidien Limited Partnership approved the permit on May 21, 2020 prior to public notice.

The WPCF approved the permit on May 21, 2020 prior to public notice.

Violations Report

UNITED STATES SURGICAL, DIVISION OF TYCO HEALTHCARE GROUP LP

DSN 2011

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
12/31/2018	Di[2-ethylhexyl] phthalate [DEHP]	MO AVG	95.0000	97.0000	ug/L

DSN 2021

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
12/31/2016	Cadmium, total [as Cd]	DAILY MX	0.1100	0.2800	mg/L
12/31/2016	Cadmium, total [as Cd]	MO AVG	0.0700	0.2800	mg/L
12/31/2016	Lead, total [as Pb]	MO AVG	0.1000	0.1200	mg/L
03/31/2018	Chromium, total [as Cr]	MO AVG	1.0000	1.2000	mg/L
08/31/2018	Chromium, total [as Cr]	DAILY MX	2.0000	2.1000	mg/L
08/31/2018	Chromium, total [as Cr]	MO AVG	1.0000	2.1000	mg/L
08/31/2018	Nickel, total [as Ni]	MO AVG	1.0000	1.2000	mg/L