conventional pollutants for all subcategories. The Agency is proposing to establish PSNS for the same priority and non-conventional pollutants as are being proposed for NSPS. In addition, given the potential for dilution and the consequent impracticality of monitoring at the point of discharge, EPA is again proposing that monitoring to demonstrate compliance with these standards be required immediately following treatment of the regulated streams.

EPA considered the cost of the proposed PSNS technology for new facilities. EPA concluded that such costs are not so great as to present a barrier to entry, as demonstrated by the fact that currently operating facilities are using these technologies. Again, EPA is requesting comment on whether it should adopt PSNS for the Oily Waste Subcategory that reflects effluent reduction levels achievable through either Option 3 or Option 4 treatment systems. The Agency considered energy requirements and other non-water quality environmental impacts and found no basis for any different standards than the selected PSNS.

F. Monitoring To Demonstrate Compliance With the Regulation

The effluent limitations EPA is proposing today apply only to discharges resulting from treatment of the subcategory wastes and not to mixtures of subcategory wastes with other wastes or mixtures of different subcategory wastes. In addition, these effluent limitations do not apply to discharges from the treatment of subcategory wastes that are mixed prior to or after treatment with other wastewater streams prior to discharge. EPA has concluded that it is impractical and infeasible to set limits for the pollutants proposed to be regulated in this category at the point of discharge for mixed waste streams, given the potential for mixing to avoid achievement of the required effluent reductions.

Thus, many facilities in this industry may operate other processes which generate wastes requiring treatment and may add these wastes to CWT wastes before treatment and discharge. This may result in dilution rather than required treatment of CWT wastes due to the difference in concentration of waste streams. In addition, if a facility discharges its non-contaminated stormwater, implementation of this proposal requires a facility to monitor the CWT discharge prior to the addition of non-contaminated stormwater. Similarly, for facilities which treat concentrated cyanide-bearing metal

wastes, the limitations for Total Cyanide are based on cyanide levels that are demonstrated to be achieved after cyanide pretreatment and prior to metals precipitation. Separate pretreatment of cyanide in metalbearing waste streams is necessary in order to ensure that cyanide will not interfere with metals treatment. Consequently, EPA has preliminarily determined that it will require compliance monitoring immediately following treatment of subcategory waste streams (e.g., metal-bearing, oily, or organic-bearing, as appropriate) unless the facility can demonstrate that it is achieving the required effluent reduction associated with separate treatment of the waste streams in a mixed waste treatment system. (See further discussion of this issue below at Section VIII.)

G. Determination of Long-Term Averages, Variability Factors, and Limitations for BPT

The proposed effluent limitations and standards in today's notice are based upon statistical procedures that estimate long-term averages and variability factors. The following sections describe the statistical methodology used to develop long-term averages, variability factors, and limitations for BPT. The limitations for BCT, BAT, NSPS, PSES, and PSNS are based upon the limitations for BPT for all pollutants.

The proposed limitations for pollutants for each option, as presented in today's notice, are provided as daily maximums and maximums for monthly averages. In most cases, the daily maximum limitation for a pollutant in an option is the product of the pollutant long-term average and the group daily variability factor. In most cases, the maximum for monthly average limitation for a pollutant for an option is the product of the pollutant long-term average and the group monthly variability factor. The procedures used to estimate the pollutant long-term averages and group variability factors are briefly described below. A more detailed explanation is provided in the statistical support document.

The long-term averages, variability factors, and limitations were based upon pollutant concentrations collected from two sources: EPA sampling episodes and the 1991 Detailed Monitoring Questionnaire. These data sources are described in Sections IV.B. and IV.D. (Data from the same facility but from different sources were analyzed as though each source provided information about a different facility.)

The long-term average for each pollutant was calculated for each

facility by arithmetically averaging the pollutant concentrations. The pollutant long-term average for an option was the median of the long-term averages from selected facilities with the BPT technology basis for the option.

The daily variability factor for each pollutant at each facility is the ratio of the estimated 99th percentile of the distribution of the daily pollutant concentration values divided by the expected value, or mean, of the distribution of the daily values. The monthly variability factor for each pollutant at each facility is the estimated 95th percentile of the distribution of monthly averages of the daily concentration values divided by the expected value of the monthly averages. The number of measurements used to calculate the monthly averages corresponds to the number of days that the pollutant is assumed to be monitored during the month. For example, the volatile organic compounds are expected to be monitored once a week (which is approximately four times a month); therefore, the monthly variability factor was based upon the distribution of fourday averages. Certain pollutants such as BOD₅ are expected to be monitored daily; therefore, the monthly variability factor was based upon the distribution of 20-day averages (most facilities operate only on weekdays of which there are approximately 20 in each month). The assumed monitoring frequency of each pollutant is identified in Table V.G-1.

TABLE V.G–1.—MONITORING FRE-QUENCIES USED TO ESTIMATE MONTHLY VARIABILITY FACTORS

Assumed Daily Monitoring Frequency	
Aluminum Antimony Arsenic Barium BOD ₅ Cadmium Chromium Cobalt Copper Iron Lead	Manganese. Mercury. Molybdenum. Nickel. Oil and Grease. Silver. Tin. Titanium. TOC. Total Cyanide. TSS.
wagnesium	ZINC.

Assumed Weekly Monitoring Frequency

Hexavalent Chro-	Methylene Chloride.
1,1,1,2- Tetrachloroethane	m-Xylene.
1,1,1-Trichloroethane	n-Decane. n-Docosane.
1,1-Dichloroethane	n-Dodecane.