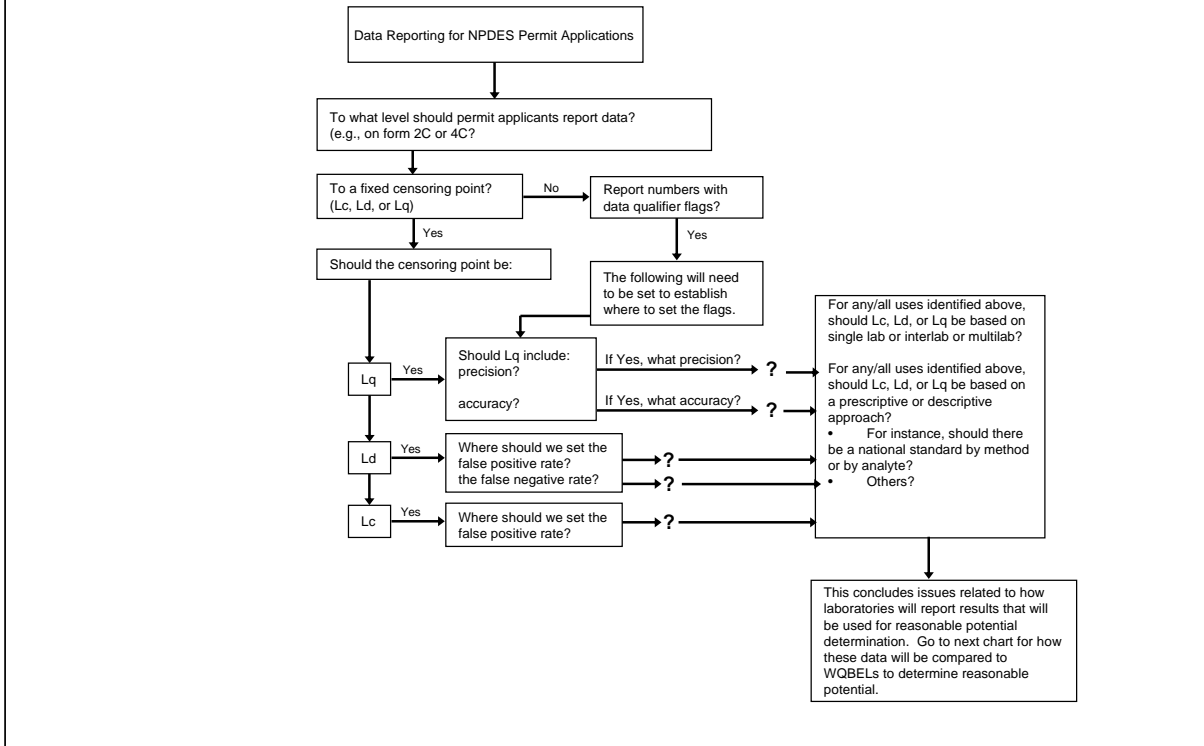
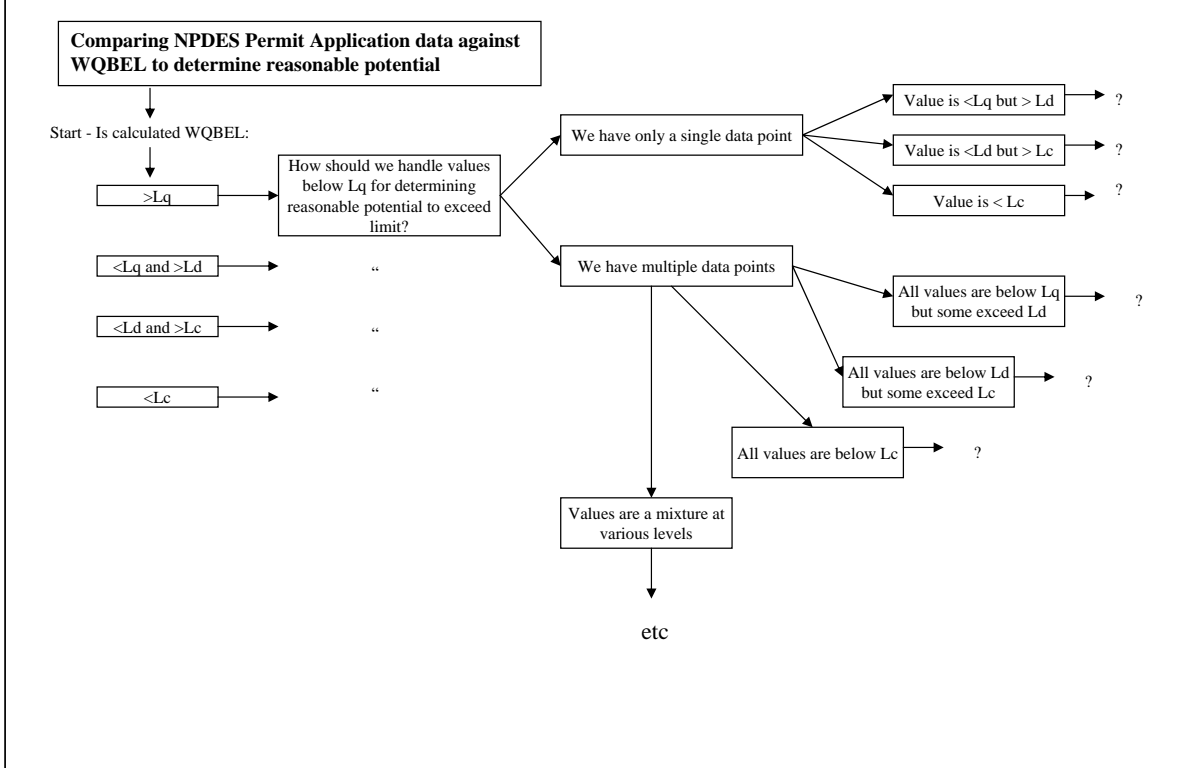


NPDES Permit Applications and Reasonable Potential Considerations Data Reporting



NPDES Permit Applications and Reasonable Potential Considerations Evaluating the data to determine reasonable potential



Setting limits in NPDES Permits

If the calculated permit limit is <math>< L_c, L_d, \text{ or } L_q</math>, Where should you set the permit limit?

Case 1.
Calculated limit <math>< L_c</math> → ?

Case 2.
Calculated limit > L_c but <math>< L_d</math> → ?

Case 3.
Calculated limit > L_d but <math>< L_q</math> → ?

NPDES Permit Compliance/Enforcement

I. If the calculated limit is <math>< L_c, L_d, \text{ or } L_q</math>, where should you evaluate compliance?

Case 1.
Calculated limit <math>< L_c</math> → ?

Case 2.
Calculated limit $L > L_c$ but <math>< L_d</math> → ?

Case 3.
Calculated limit > L_d but <math>< L_q</math> → ?

II. If L_q is used for any of the above:
should L_q be based on precision? → ?
should L_q be based on accuracy? → ?

If L_d is used for any of the above:
what should the false positive rate be set at? → ?
what should the false negative rate be set at? → ?

If L_c is used for any of the above:
what should the false positive rate be set at? → ?

Next Issue:

Data reporting for NPDES permits
Both with respect to Compliance and Non-compliance monitoring

III. For any/all uses identified above, should $L_c, L_d, \text{ or } L_q$ be based on single lab or interlab or multilab?
For any/all uses identified above, should $L_c, L_d, \text{ or } L_q$ be based on a prescriptive or descriptive approach?

- Considerations under prescriptive approaches
 - Should there be a national standard (e.g. a promulgated DL or QL)
 - Should a national standard be based on method/analyte or by analyte only?
 - Should there be some sort of validation procedure each lab must perform to demonstrate capability to measure at the national standard level (and what is the validation procedure).
 - Others?
- Considerations under a descriptive approach