# DEQ Montana Department of Environmental Quality

# Montana Pollutant Discharge Elimination System Petroleum Cleanup General Permit Fact Sheet • MTG790000

# I. Summary

The Department of Environmental Quality (DEQ) proposes to renew the Montana Pollutant Discharge Elimination System (MPDES) Petroleum Cleanup General Permit (PCGP), MTG790000. This fact sheet documents the legal requirements and technical rationale that serve the decision-making process involved with developing effluent limits, monitoring and reporting requirements, and special conditions specific to petroleum cleanup.

# A. Permit Status

The PCGP was first issued in 1992 and was most recently renewed in 2013. The renewed permit became effective in February 2013 and was administratively continued in January of 2018.

# **B.** Proposed Permit Changes

For this permit renewal, DEQ proposes the following:

- The use of water treatment additives is prohibited without written consent from DEQ.
- If the operation is located in sage grouse habitat, consultation with the Montana Sage Grouse Habitat Conservation Program is required.
- Analysis for potential contaminants must be submitted with the Notice of Intent (NOI-79) form, before authorization under the PCGP.
- For sites active before or during 1995, lead analysis is also required with the NOI-79 form.
- All effluent limits are set according to nondegradation criteria for determining nonsignificant changes in water quality as laid out in ARM 17.30.715.
- Special conditions apply regarding best management practices and corrective actions to prevent streambank erosion and visual oil sheens

#### II. Description of Discharge and Discharging Facilities A. Background Information

Petroleum cleanup discharges originate from corrective actions involving the cleanup of gasoline, diesel fuel, kerosene, jet fuel, heating oil, other petroleum products, or the cleanup of sites related to the transportation of these materials (including pipelines). Wastewater from petroleum cleanup corrective actions may include surface and/or ground water resulting from excavation activity, remediation activity, surface and/or ground water contaminated by spills, or ground water resulting from pumping and/or monitoring aquifers.

The volume and source of discharges resulting from petroleum cleanups are expected to be highly variable. Discharges are often intermittent over the duration of the project, but may be continuous for several years. Based on available data, the following sections briefly describe the nature of the discharges that would be expected.

#### **B.** Treatment Technologies

Technologies commonly employed at petroleum cleanup sites include carbon adsorption in combination with oil/water separators and air stripping units. Air stripping is the process of moving air through contaminated groundwater or surface water to remove volatile organic compounds (VOCs) by changing them from a liquid to a vapor. There are several methods of air stripping including diffused aeration, tray aerators, spray basins, and packed towers. The Environmental Protection Agency (EPA) estimates that the

potential removal efficiency of BTEX (the sum of benzene, toluene, ethylbenzene, and xylene isomers) using an air stripper unit is 99.5 percent. Due to the high volatility of many of the soluble constituents in gasoline and other petroleum products that remain in contaminated water, air stripping is a proven, efficient, and cost-effective treatment technology.

In some cases, volatilized pollutants may require additional treatment, such as vapor phase carbon adsorption, to control pollutant discharges to air. Carbon adsorption uses activated carbon and inert solid adsorbent material to remove contaminants from water and process gas-phase streams.

#### C. Existing Permit Requirements and Covered Facilities

Currently, three authorizations are effective under the PCGP: a railroad recovering diesel fuel from ground water and two remediation projects from previously established gas station underground storage tanks. The three facilities use air strippers, oil/water separators, and granular activated carbon to treat wastewater before discharging to surface water. The following tables list the 2013-permit limits and effluent characteristics of the petroleum cleanup sites for the period of record (POR) February 2013 to July 2019.

Table 1: Effluent Characteristics for MTG790013:Burlington Northern Santa Fe Railway						
Parameter	Units	Maximum Daily Limit <sup>(1)</sup>	Maximum Value	Average Value	Sample Size	
Benzene	ug/L	0.5	> 0.6 <sup>(2)</sup>	> 0.6 (2)	28	
Total BTEX (3)	ug/L	100	0.54	0.48	28	
MTBE	ug/L	12	> 1 <sup>(2)</sup>	> 1 <sup>(2)</sup>	8	
Oil and Grease	mg/L	4.0	1.0	1.0	28	
pH	s.u.	6.0 - 9.0	$6.59 - 8.14^{(4)}$	7.25	28	
Flow Rate	mgd	monitoring required	0.61	0.28	28	
<ul> <li>(1) The maximum value allowed in any single sample</li> <li>(2) All values were below the required reporting value</li> <li>(3) The first state of the st</li></ul>						

<sup>(3)</sup> The sum of benzene, toluene, ethylbenzene and xylene (meta, ortho and para) isomers

<sup>(4)</sup> Minimum reported value to maximum reported value

Parameter	Units	Maximum Daily Limit <sup>(1)</sup>	Maximum Average Value Value		Sample Size
Benzene	ug/L	0.5	> 0.6 <sup>(2)</sup>	> 0.6 <sup>(2)</sup>	3
Total BTEX (3)	ug/L	100	0 (2)	0 (2)	3
MTBE	ug/L	12	> 1 <sup>(2)</sup>	> 1 <sup>(2)</sup>	3
Oil and Grease	mg/L	4.0	> 1 <sup>(2)</sup>	> 1 <sup>(2)</sup>	3
pН	s.u.	6.0 - 9.0	$7.44 - 8.76^{(4)}$	8.01	4
Flow Rate	mgd	monitoring required	0.014	0.005	4

<sup>(3)</sup> The sum of benzene, toluene, ethylbenzene and xylene (meta, ortho and para) isomers

<sup>(4)</sup> Minimum reported value to maximum reported value

The third discharger is MTG790016: CalClean, Inc. At the time of development of this fact sheet, CalClean has not commenced discharging. Therefore, there are no reported effluent characteristics to date.

# III. Permit Applicability

# A. Coverage Area

The PCGP applies to all areas of the State of Montana, except Indian Reservations.

# **B.** Sources Eligible for Coverage

Petroleum cleanup discharges from corrective actions involving above ground or underground storage tanks used to store gasoline, diesel fuel, kerosene, jet fuel, heating oil, or the transportation of these materials (including pipelines) are eligible for coverage under this general permit. This may include surface and/or groundwater resulting from excavation or remediation activity, surface and/or ground water contaminated by spills, or ground water resulting from pumping and/or monitoring aquifers. Other petroleum cleanup activities may be covered if they meet the requirements of the PCGP.

# C. Sources Excluded from Coverage

DEQ may deny an application for discharge under the PCGP for the following:

- 1. The discharger is unable to comply with:
  - a. Effluent limits or other terms and conditions of the permit, including those listed in the Special Conditions;
  - b. Water quality standards; or
  - c. Discharges that the regional administrator has objected to in writing.
- 2. The discharge is different in degree or nature than those described in the PCGP.
- 3. The same operation has previously been denied or revoked an MPDES permit or authorization.
- 4. The discharge is also included within an application, or is subject to review, under the Major Facility Siting Act.
- 5. The proposed point sources are in an area of unique ecological or recreational significance. Such determinations are based upon:
  - a. Montana stream classifications;
  - b. Impacts on fishery resources;
  - c. Local conditions at proposed discharge sites; and
  - d. Areas designated wilderness or wild and scenic rivers.
- 6. The facility discharges to waters classified as A-Closed, as these waters are typically used for drinking water. No increase above naturally occurring turbidity and no change in dissolved oxygen, pH, and temperature are allowed in this water classification, so it would not be cost-effective to treat wastewater from petroleum cleanup activities to these levels.
- 7. The discharge contains lead from a historic leaded gasoline spill or from another source.
- 8. The proposed receiving water is on the 303(d)-impairment list for any pollutant of concern in this permit

**Volatiles, acid compounds, and base/neutral compounds** – Prior to any discharge, the applicant must submit applicable surface water and/or groundwater analyses including all parameters in 40 Code of Federal Regulations (CFR) Part 122, Appendix D, Table II, excluding pesticides (see Appendix A at the end of this fact sheet). Laboratory analytical results must meet the RRVs in Circular DEQ-7. If the analyses demonstrate that toxic pollutants are present above water quality standards, other than what is expected in petroleum cleanup fuels, discharge is prohibited under this PCGP.

Lead – Tetraethyl lead was used as an additive in gasoline, before it was phased out by EPA in 1995, and may be present at some historic petroleum sites. If the petroleum cleanup site seeking authorization was active before or during 1995, a lead sample analysis must be submitted prior to discharge. If lead is known to be present, discharge is prohibited under this PCGP.

**Water Treatment Additives** – This permit does not authorize the discharge of water treatment additives, for conditioning or treatment of wastewater, without written approval from DEQ. In the event a permittee proposes to utilize a water treatment additive, the permittee shall submit to the agency a request, including the Material Safety Data Sheets (MSDS), for review.

If a permittee is denied authorization under the general permit, they may apply for authorization under the individual MPDES permit requirements by submitting the required forms and fees.

#### **D.** Requirements for Authorization

**Notice of Intent (NOI) Package** – A complete NOI package includes a complete NOI-79 form, any supplemental information requested on the NOI-79 form, and applicable fees (specified in ARM 17.30.201).

**Dischargers seeking continued coverage** must submit a complete renewal request (NOI package) within 30 days of the effective date of this permit including:

- Petroleum Cleanup Notice of Intent Form (NOI-79);
- Renewal fee for each outfall;
- Topographic map extending at least one mile beyond the property boundaries or operations site;
- Material Safety Data Sheets for water treatment additives being used, if applicable; and
- A Montana Sage Grouse Habitat Conservation Program consultation letter, if applicable.

**New sources** seeking coverage must submit an NOI package for the PCGP at least 30 days prior to construction or operation, which includes:

- Petroleum Cleanup Notice of Intent Form (NOI-79);
- Application fee for each outfall;
- Topographic map extending at least one mile beyond the property boundaries or operation site;
- Material Safety Data Sheets for water treatment additives being used, if applicable;
- A Montana Sage Grouse Habitat Conservation Program consultation letter, if applicable:
- A process flow diagram showing water flow through the treatment system;
- Laboratory analysis for potential contaminants listed in 40 CFR Part 122, Appendix D, Table II excluding pesticides (see Appendix). If the site was active before or during 1995, include additional laboratory results for lead. All analysis must be completed using approved methods in 40 CFR 136 and must meet the Required Reporting Values (RRVs) in Circular DEQ-7;
- Analysis from consultation with the Montana Natural Heritage Program; and
- Analysis from consultation with the Montana State Historic Preservation Office.

Permittees requesting a modification must submit an NOI package including:

- Petroleum Cleanup Notice of Intent Form (NOI-79);
- Modification fee for each modified outfall;
- Any additional information regarding, or effected by, the modification request

Facilities eligible for coverage will be issued a letter of authorization to the owner or operator of the facility. If the facility does not qualify for coverage, DEQ will notify the applicant. The applicant may then apply for an individual permit or modify the operation and re-apply for coverage under the PCGP.

#### E. Terminating Authorization

Authorizations remain in effect unless DEQ receives a written notice, or a Request for Termination (RFT), from the permittee notifying the department that the authorization should be terminated. This notice must be signed and certified according to the signatory requirements in III.N. of the permit and all applicable fees must be paid. Failure to submit a written notice of termination shall result in accrual of annual fees.

# F. Transferring Permit Coverage

Permit coverage may be transferred to a new owner or operator in conformance with Part III.O.3. of the general permit. A Permit Transfer Notification (PTN) form and the applicable minor modification fee must be submitted to the department at least 30 days prior to the anticipated date of transfer.

#### **IV.** Proposed Effluent Limitations

The Montana Board of Environmental Review (BER) has adopted general treatment requirements that establish the degree of wastewater treatment required to restore and maintain the quality of surface waters. This rule states that the degree of wastewater treatment is based on the surface water quality standards; the State's nondegradation policy; present and anticipated beneficial uses of the receiving water; the quality and flow of the receiving water; the quantity and quality of sewage; industrial wastes and other wastes to be treated; and the presence or absence of other sources of pollution in the same watershed.

#### A. Technology-Based Effluent Limits (TBELs)

**Applicable Guidelines** – Technology-based effluent limits represent the minimum treatment requirements implemented in MPDES permits. TBELs are derived from national Effluent Limitation Guidelines (ELGs), standards established by EPA, and/or the permit writer using best professional judgement on a case-by-case basis. ELGs have not been promulgated for discharges for ground water cleanup/petroleum recovery facilities. However, the EPA has published TBELs for underground storage tank cleanup sites based on best professional judgment (BPJ). The technology basis used to develop these TBELs is free product recovery followed by air stripping, with or without carbon adsorption.

**Technology-Based Effluent Limits** – A traditional industry approach to limiting parameters associated with gasoline or other fuel oils has been to limit BTEX. EPA has established BTEX as the indicator parameter in discharges from gasoline and petroleum release sites because the composition of gasoline is highly variable and any one of the four BTEX constituents (benzene, toluene, ethylbenzene, and xylene) can be predominant. The established TBELs for pH, benzene, and total BTEX, based on the level of performance for air stripping, are listed in Table 3 below.

Table 3. Technology-Based Effluent Limits					
Parameter	Units	Effluent Limits			
rarameter	Units	Daily Average	Daily Max		
Benzene	ug/L	5 5			
Total BTEX <sup>(1)</sup>	ug/L	100 100			
рН	s.u.	6.0 - 9.0 (instantaneous)			
<sup>(1)</sup> The sum of benzene, toluene, ethylbenzene and xylene (meta, ortho and para) isomers					

# B. Water Quality-Based Effluent Limits (WQBELs)

**Applicable Guidelines** – The Montana Water Quality Act states that a permit may only be issued if DEQ finds that it will not result in pollution of state waters. MPDES permits shall include limitations on all pollutants which will cause, or have reasonable potential to cause, an excursion of any numeric or narrative water quality standard. WQBELs are designed to protect these standards and are required when TBELs are not adequately protective. The purpose of this section is to provide a basis and rationale for establishing effluent limits that will protect designated uses of the receiving water based on Montana water quality standards and water use classifications.

**Mixing Zones** – No mixing zones are authorized under the PCGP. All effluent limits must be met at the end of the discharge pipe before the effluent reaches state waters.

**Applicable Water Quality Standards & Pollutants of Concern** – Discharges from petroleum cleanup activities must comply with general prohibitions (narrative standards) which require that state waters, including mixing zones, must be free from substances which will:

- (a) settle to form objectionable sludge deposits or emulsions beneath the surface of the water or upon adjoining shorelines;
- (b) create floating debris, scum, a visible oil film (or be present in concentrations at or in excess of 10 milligrams per liter), or globules of grease or other floating materials;
- (c) produce odors, colors or other conditions as to which create a nuisance or render undesirable tastes to fish flesh or make fish inedible;
- (d) create concentrations or combinations of materials which are toxic or harmful to human, animal, plant or aquatic life; and
- (e) create conditions which produce undesirable aquatic life.

WQBELs are evaluated for pollutants of concern (POCs) based on water quality standards applicable to the receiving water at the point of discharge. The applicable standards and nondegradation criteria for POCs at petroleum cleanup sites are summarized in Table 4.

Table 4. Water Quality Standards Specific to Petroleum Cleanup						
Parameter	Units	Category	Human Health Standard	Nondegradation Criteria	Required Reporting Value (RRV)	
Benzene	ug/L	Carcinogen	5	0	0.6	
Toluene	ug/L	Toxic	57	9	1	
Ethylbenzene	ug/L	Toxic	68	10	1	
Xylenes. Total	ug/L	Toxic	10,000	1,500	3	
MTBE	ug/L	Harmful	30	3	1	
Oil and Grease	mg/L	Narrative	10	4	1	

**Nondegradation** – The Montana Water Quality Act includes a nondegradation policy that prohibits degradation of state waters and applies to any new activity resulting in a change to existing water quality. The nondegradation values in Table 4 are calculated using rules set forth in ARM 17.30.715 based on the category of the pollutant.

**Benzene** - The nondegradation criterion for carcinogenic parameters is "…less than or equal to the concentrations of those parameters in the receiving water" or no increase above background. Since benzene is not considered a natural background parameter, the nondegradation criterion is zero (0).

**Toluene, Ethylbenzene, and Xylenes** – The criterion for toxic parameters states that the resulting concentration from a discharge cannot exceed fifteen percent of the lowest applicable standards.

**MTBE** – Discharges of harmful parameters must not create a change in surface water above ten percent of the applicable standards when existing water quality is less than forty percent of the standard. MTBE is not considered to be a natural background parameter. Therefore, the nondegradation criteria is set at ten percent of the 30 ug/L standard.

**Oil and Grease** – Changes in water quality for any narrative standards must not have a measurable effect on existing or anticipated uses, or cause measurable changes in aquatic life or ecological integrity. The previous permit set the nondegradation value for oil and grease at 4.0 mg/L. This value will be retained in this permit.

Based on these nondegradation criteria and their implementation in developing limits, DEQ determined discharges under this PCGP are nonsignificant.

#### V. Final Effluent Limitations

pH – The technology-based limit of 6.0 – 9.0 s.u. is sufficiently protective of water quality. No additional WQBELs are required for this parameter.

**Oil and Grease** – Due to the large number of chemicals contained in refined petroleum products, the measurement of all component chemicals is not practical, cost effective, or necessary for attainment of water quality standards. The oil and grease effluent limit of 4.0 mg/L, based on narrative standards and nondegradation criteria, is retained in this permit. Daily visual monitoring will also be required for periods of discharge. If visual monitoring indicates the presence of oil and grease, additional samples must be submitted for analysis and discharge must cease if the concentration is found to be greater than 4.0 mg/L.

The EPA recommended methods for testing oil and grease and total petroleum hydrocarbons (TPH) are methods 1664A and 1664B. To obtain only the non-polar material (NPM), including straight and branched chain hydrocarbons and other chemical substances, the silica-gel treated, hexane extractable material (SGT-HEM) procedure must be used. Permittees must request the SGT-HEM procedure when submitting a sample to the laboratory to obtain the NPM component of oil and grease (some laboratories call the SGT-HEM procedure the TPH by 1664A procedure).

**Total BTEX** – The technology-based limit of 100 ug/L total BTEX is more stringent than the sum of the nondegradation values for WQBELs and will therefore be carried forward. In addition, a separate limit for benzene will be retained to protect the nondegradation limit of 0 mg/L (or no increase above background).

**MTBE** – MTBE is a common fuel additive found in gasoline and may be present on petroleum cleanup sites. The more stringent nondegradation limit of 3.0 ug/L for MTBE will be used in this permit.

Average monthly limits are not established in this permit as they may not comply with the maximum daily nondegradation criteria. The following table summarizes the final effluents discussed above:

Table 5. Final Effluent Limits					
Parameter	Units	Maximum Daily Limit <sup>(1)</sup>			
Benzene	ug/L	0 (2)			
Total BTEX (3)	X <sup>(3)</sup> ug/L 100				
MTBE	ug/L	3			
pН	s.u. 6.0-9.0				
Oil and Grease	mg/L 4.0				
<ul> <li><sup>(1)</sup> The maximum value allowed in any single sample</li> <li><sup>(2)</sup> Reporting non-detect with analysis that meets the RRV (0.6 ug/L) is considered in compliance with the benzene limit</li> <li><sup>(3)</sup> The sum of benzene, toluene, ethylbenzene and xylene (meta, ortho, and para) isomers</li> </ul>					

There shall also be no discharge of floating solid or visible foam other than in trace amounts. There shall be no discharge which causes visible oil sheen in the receiving water.

There shall be no discharge that settles to form objectionable sludge deposits or emulsions beneath the surface of the water or upon adjoining shorelines.

#### VI. Self-Monitoring and Reporting Requirements

Monitoring will start with the date of the authorization letter and is required during periods of discharge. All analytical procedures must comply with the specifications of 40 CFR Part 136. All dischargers must submit NetDMR results for each month by the 28<sup>th</sup> of the following month. Permittees shall monitor the effluent quality at the end of the discharge pipe before it enters state waters. The monitored parameters and frequency requirements are presented in Table 6. If no discharge occurs during the reported period, "no discharge" shall be reported on the NetDMR. The samples collected and analyzed must be representative of

the volume and nature of the facility's discharge. The RRV is DEQ's best determination of a level of analysis that can be achieved using EPA-approved methods or methods approved by DEQ.

Table 6. Monitoring and Reporting Requirements <sup>(1)</sup>						
Parameter	Units	Sample Type <sup>(2)</sup>	Minimum Frequency <sup>(3)</sup>	<b>RRV</b> <sup>(4)</sup>		
Effluent Flow	mgd	Instantaneous	1/Day			
Benzene	ug/L	Grab	1/Week	0.6		
Total BTEX <sup>(5)</sup>	ug/L	Grab	1/Week	(6)		
MTBE	ug/L	Grab	1/Week	1.0		
Oil and Grease <sup>(7)</sup>	yes/no	Visual <sup>(8)</sup>	1/Day			
	mg/L	Grab	1/Week	1.0		
pН	s.u.	Grab	1/Week	0.1		
(1) All parameters must be reported as daily maximum						

<sup>(2)</sup> See definition section at the end of permit for explanation of terms

<sup>(3)</sup> Monitoring is required only for any calendar period where there is discharge

<sup>(4)</sup> Required Reporting Value. If reporting non-detect, analysis must achieve these, or lower, RRVs

<sup>(5)</sup> The sum of benzene, toluene, ethylbenzene and xylene (meta, ortho, and para) isomers

<sup>(6)</sup> Refer to the individual RRVs for each parameter (benzene, toluene, ethylbenzene and xylene)

<sup>(7)</sup> Use Method 1664A or Method 1664B and specify the SGT-HEM procedure

<sup>(8)</sup> If visual monitoring indicates the presence of hydrocarbons, by sheen, odor, or other sign, the permittee is required to take corrective action as specified under the Special Conditions of this permit, including analyzing an additional grab sample under 40 CFR 136.

#### **VII.** Special Conditions

**Best Management Practices** – Discharge flow must not cause erosion to receiving streambeds or banks. If necessary, best management practices (BMPs) such as flow dissipation devices or rip rap must be installed to reduce/control erosion.

**Corrective Action** – Upon visual observation of an oil sheen or inadequate BMPs leading to erosion, the following steps must be conducted:

- Take a grab sample for analysis if there is an observation of oil and grease.
- Cease discharge until the issue is resolved.
- Conduct a site-wide inspection to observe operating conditions and BMP maintenance.
- Address any failures or inadequate BMPs
- Document the issues in writing to DEQ

#### **Information Sources**

Administrative Rules of Montana Title 17 Chapter 30 - Water Quality

- Subchapter 2 Water Quality Permit and Application Fees
- Subchapter 6 Montana Surface Water Quality Standards and Procedures
- Subchapter 7 Nondegradation of Water Quality
- Subchapter 12 Montana Pollutant Discharge Elimination (MPDES) Standards
- Subchapter 13 Montana Pollutant Discharge Elimination (MPDES) Permits

Vermont Department of Environmental Conservation. General Permit 3-9004 Discharges from Petroleum Related Remediation Activities. Agency of Natural Resources.

EPA. Fact Sheet for Model NPDES Permit for Discharges Resulting from the Cleanup of Gasoline Released from Underground Storage Tanks. June 1989.

EPA. Model NPDES Permit for Discharges Resulting from the Cleanup of Gasoline Released from Underground Storage Tanks. June 1989.

Federal Water Pollution Control Act (Clean Water Act), 33 U.S.C. §§ 1251-1387, October 18, 1972, as amended 1973-1983, 1987, 1988, 1990-1992, 1994, 1995 and 1996.

Montana Code Annotated (MCA), Title 75-5-101, et seq., "Montana Water Quality Act."

Montana DEQ. 2017. Department Circular DEQ-7, Montana Numeric Water Quality Standards.

Montana DEQ. Montana Pollutant Discharge Elimination System (MPDES) Permit Number MTG790000 Administrative Record. October 2017.

US Code of Federal Regulations, 40 CFR Parts 122-125, 130-133, & 136.

Washington State Department of Ecology. Guidance for Remediation of Contaminated Sites. Pub. No. 10-09-057. (undated)

#### APPENDIX A

# TABLE II - ORGANIC TOXIC POLLUTANTS IN EACH OF FOUR FRACTIONS IN ANALYSIS BY GAS CHROMATOGRAPHY/MASS SPECTROSCOPY (GS/MS)

#### Volatiles

1V acrolein 2V acrylonitrile 3V benzene 5V bromoform 6V carbon tetrachloride 7V chlorobenzene 8V chlorodibromomethane 9V chloroethane 10V 2-chloroethylvinyl ether 11V chloroform 12V dichlorobromomethane 14V 1,1-dichloroethane 15V 1,2-dichloroethane 16V 1,1-dichloroethylene 17V 1,2-dichloropropane 18V 1,3-dichloropropylene 19V ethylbenzene 20V methyl bromide 21V methyl chloride 22V methylene chloride 23V 1,1,2,2-tetrachloroethane 24V tetrachloroethylene 25V toluene 26V 1,2-trans-dichloroethylene 27V 1.1.1-trichloroethane 28V 1.1.2-trichloroethane 29V trichloroethylene 31V vinyl chloride

#### Acid Compounds

1A 2-chlorophenol

2A 2,4-dichlorophenol 3A 2,4-dimethylphenol 4A 4,6-dinitro-o-cresol 5A 2,4-dinitrophenol 6A 2-nitrophenol 7A 4-nitrophenol 8A p-chloro-m-cresol 9A pentachlorophenol 10A phenol 11A 2,4,6-trichlorophenol

#### Base/Neutral

1B acenaphthene 2B acenaphthylene 3B anthracene 4B benzidine 5B benzo(a)anthracene 6B benzo(a)pyrene 7B 3,4-benzofluoranthene 8B benzo(ghi)perylene 9B benzo(k)fluoranthene 10B bis(2chloroethoxy)methane 11B bis(2-chloroethyl)ether 12B bis(2-chloroisopropyl)ether 13B bis (2-ethylhexyl)phthalate 14B 4-bromophenyl phenyl ether 15B butylbenzyl phthalate 16B 2-chloronaphthalene 17B 4-chlorophenyl phenyl ether

18B chrysene 19B dibenzo(a,h)anthracene 20B 1,2-dichlorobenzene 21B 1,3-dichlorobenzene 22B 1.4-dichlorobenzene 23B 3,3'-dichlorobenzidine 24B diethyl phthalate 25B dimethyl phthalate 26B di-n-butyl phthalate 27B 2.4-dinitrotoluene 28B 2.6-dinitrotoluene 29B di-n-octyl phthalate 30B 1,2-diphenylhydrazine (as azobenzene) 31B fluroranthene 32B fluorene 33B hexachlorobenzene 34B hexachlorobutadiene 35B hexachlorocyclopentadiene 36B hexachloroethane 37B indeno(1,2,3-cd)pyrene 38B isophorone 39B napthalene 40B nitrobenzene 41B N-nitrosodimethylamine 42B N-nitrosodi-n-propylamine 43B N-nitrosodiphenylamine 44B phenanthrene 45B pyrene

46B 1,2,4-trichlorobenzene