

## REASONABLE POTENTIAL DETERMINATION PRIMER

Hello. I'm Frank Doherty, Founder and President of Aquatox Research.

As I discussed in the previous video, The New York State Department of Environmental Conservation has the authority to issue effluent discharge permits to facilities in New York discharging to a surface water. Permittees are required to test their wastewaters to demonstrate the environmental acceptability either through analytical methods only or analytical and biological methods such as WETT testing.

The results from WETT tests are subjected to two levels of assessment. As discussed previously, the first level of assessment is a direct comparison between the experimental TU value and the MAL or Enforceable limit. The second level of assessment is referred to as Reasonable Potential Determination.

Even if experimental TU values come in less than the MAL in the first phase of the assessment they are still subjected to Reasonable Potential Determination or RPD in the second level of assessment. The RPD is conducted by applying a multiplier to the experimental TU values and then comparing once again to the MAL in a permit.

The multiplier is a function of the number of toxicity tests conducted during the year. A table with the multipliers appears in the NYS DEC's Technical and Operational Guidance Series or [TOGS document 1.3.2](#) entitled Acute and Chronic Toxicity Testing in the SPDES Permit Program. [Appendix VI](#) on Page 23 of that document addresses RPD. [Table 1](#) within this appendix on Page 24 lists the multipliers used to adjust the experimental TU values for recomparison with the permit MALs.

WETT reports issued by Aquatox Research are provided via email in pdf format and will include a [link to the NYS DEC TOGS 1.3.2](#) for reference. When a facility generates results that ultimately Fail one or both of the levels of assessment conducted by the DEC, they could be required to enter a test phase referred to as Toxicity Identification/Reduction Evaluation or TI/RE. Please join me in the follow on video where I discuss the various aspects of traditional TI/REs.

Thank you for your time. I look forward to answering any questions you may have about our services .

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