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 AUTH. NAME AUTHOR AFFILIATION
 SAGER, D.A. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards MA Smith 900601 ltr to WR Cunningham of EPA requesting mod to plant NPDES permit.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

JUN 18 1990
L-90-213
10 CFR 50.36b

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
NPDES Permit Modification

In accordance with Section 3.2.4 of the St. Lucie Units 1 and 2 Environmental Protection Plans, attached for your information is a copy of a letter to the U. S. Environmental Protection Agency requesting a modification to the St. Lucie Plant NPDES permit. The specific modification is discussed in the attached document.

Very truly yours,

DASager

D. A. Sager
Vice President
St. Lucie Plant

DAS/DMB/gp

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

9006260374 900618
PDR ADOCK 05000335
P PDC

an FPL Group company

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CERTIFIED MAIL
RETURN-RECEIPT-REQUESTED

June 1, 1990

Mr. W. Ray Cunningham, Director
Water Management Division
Region IV
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, GA 30365

RE: Request for Permit Modification
NPDES Permit No. FL0002208
St. Lucie Power Plant

Dear Mr. Cunningham:

Florida Power & Light Company (FPL) hereby requests a modification to the above referenced NPDES permit. FPL is requesting a modification to the NPDES permit to enable us to perform steam generator chemical cleaning at the St. Lucie Plant. Specifically, FPL is seeking the Agency's approval for the following:

- The establishment of discharge limits for the chemical cleaning wastes.
- The designation of a new (temporary) point of discharge for metal cleaning wastes.
- The designation of serial 005, steam generator blowdown, as a source of metal cleaning wastes during the chemical cleaning.

The number of St. Lucie Unit No. 1 steam generator tubes that have had to be plugged due to corrosion has increased significantly since 1984. The corrosion process is related to contaminants which have become entrapped within metallic oxide (iron and copper) deposits in isolated areas of the steam generators. FPL has determined that the best way to reduce the corrosion is to remove the contaminants along with the metallic oxides using a chemical cleaning process. This has prompted FPL to plan for a chemical cleaning of the St. Lucie Unit No. 1 steam generators at the next scheduled refueling outage in the fall of 1991.

The process FPL plans to apply is one that the Electric Power Research Institute-Steam Generator Owners Group (EPRI-SGOG) developed which will be adapted for application at the St. Lucie Plant. The EPRI-SGOG chemical cleaning process is shown in attachment 1. This process has been successfully used by other utilities to clean

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their steam generators.

The chemical cleaning process involves separate cleaning steps to remove the copper and iron oxides. Rinses are also performed between the iron and copper steps. At St. Lucie Unit No. 1 two steam generators (approximate volume of 3340 cu-ft each) would be cleaned. It should be noted that FPL will be cleaning the secondary side of the steam generators not the primary (reactor water) side. However, there is a potential for a small amount of radioactive material to be present in the cleaning wastes. All treatment and or disposal of any radioactive material associated with the chemical cleaning will be performed in accordance with all applicable federal and state regulations and with the plant's technical specifications issued by the Nuclear Regulatory Commission (NRC).

Since this chemical cleaning was not anticipated during the renewal of the St. Lucie NPDES permit, appropriate limits for effluent waste streams associated with the chemical cleaning process have not yet been established. However, in order to perform the chemical cleaning, FPL is requesting that discharge limits be established. To assist the EPA establish effluent limits for the chemical cleaning process, FPL has undertaken toxicity studies for EDTA (the primary constituent of the chemical cleaning solvents) and for the spent iron and copper solutions. A report summarizing the EDTA study results, along with our interpretation of these results and suggested limits is included herein for the Agency's review.

The initial test results obtained with the spent iron and copper solutions were not definitive. Therefore, FPL is conducting further testing for use as a basis for establishing discharge limits for EDTA complexes including iron and copper. The EDTA complexes should not be biologically available to aquatic organisms. The FPL tests will verify that there will be no significant toxicity in the receiving waters. This information will be provided to the Agency upon completion of the tests. The discharge for uncomplexed iron and copper would remain the same (1 mg/L) as in the current NPDES permit. In addition, the discharge of hydrazine (a constituent in the iron solvent) would be limited to an average resulting concentration of 0.6 mg/L at the headwall consistent with our correspondence of December 2, 1988. This will be the first steam generator cleaning to be performed at the St. Lucie Power Plant. We anticipate that these cleanings would occur very infrequently, and would be performed only during scheduled outages.

FPL is seeking final agency action on this request by September 1990. The need for this information is to support the process application selection. FPL will need to have this approval in order to provide specifications for the chemical cleaning process and vendors bidding on the process will need to know this information in order to design and engineer their systems.

Please feel free to contact Winifred Perkins of my staff at (407) 640-2023 if you have any questions or comments concerning this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin A. Smith". The signature is fluid and cursive, with the first name "Martin" being the most prominent.

Martin A. Smith, Ph.D.
Manager
Environmental Permitting & Programs
Florida Power & Light Company

MAS/WGP/jlf

Enclosure

cc: Charles Kaplan - EPA
William Peltier - EPA - Athens
Vik Kamath - DER - WPB



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Attachment I

EPRI SGOG CLEANING PROCESS

SGOG Iron Solvent -

EDTA	= 10% by weight
Hydrazine	= 1% by volume
CCI-801 (base metal inhibitor)	= .75% by volume
pH	= 7.0 with ammonia

SGOG Copper Solvent -

EDTA	= 5% by weight
pH	= 7.0 with ammonia
pH	= 9.5 with EDA
Hydrogen Peroxide	= 3% by volume

**PSL STEAM GENERATOR
CHEMICAL CLEANING WASTES:
RECOMMENDED DISCHARGE LIMITS**

**Environmental Affairs Department
May 1990**

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I. Background

The Environmental Affairs Department was asked to evaluate wastes that would be generated from the proposed chemical cleaning protocol for the PSL Steam Generators from the standpoint of defining allowable discharge limits where NPDES steam electric guidelines have not been established. To this end, toxicity tests were conducted by Hunter/ESE of Gainesville, Florida on a 10% EDTA solution prepared by Combustion Engineering, Inc. of Windsor Connecticut. Summary data from the Hunter/ESE report are appended to this report.

This report develops recommendations to establish effluent limits at the point of discharge for concentrations of free EDTA from the steam generator chemical cleaning process, under different flow conditions of both the point discharge and the total throughput of the plant in the discharge canal.

The toxicity tests were conducted using two salt water species, the mysid shrimp (Mysidopsis bahia) and the sheepshead minnow (Cyprinodon variegatus). The tests followed standard EPA protocols (Peltier and Weber, 1985) for developing 96-hour LC₅₀s, or the percent effluent concentration that is lethal to 50% of the organisms within a 96-hour exposure period. Using this toxicological endpoint for the most sensitive of the two species, toxicity-based discharge limits were developed for EDTA from the procedure given in Section 12 of the EPA guidance document (Peltier and Weber, 1985).

Control survival and water quality parameters were all within acceptable limits for concentration ranges from which the LC₅₀s were calculated except for unexplained pH shifts in certain test concentrations. Although the lowered pH may have contributed to observed toxicity, the data are acceptable for development of allowable discharge limits since any effect the pH shifts may have had would only contribute to the conservatism of the recommended limits.

The recommended concentration limits for EDTA in the St. Lucie steam generator chemical cleaning discharge are developed below.

II. Ethylenediamine Tetraacetic Acid (EDTA)

The 96-hr. LC_{50} for a 10% solution of EDTA (hypothetical effluent) for the most sensitive species (Mysidopsis bahia) of the two species tested is 0.2% effluent.

Converting to amount EDTA per liter of effluent:

$$\begin{aligned} & 0.2\% \text{ of } 10\% \text{ EDTA solution} \\ = & 0.002 \times 100 \text{ g EDTA/l} = 0.2 \text{ g/l.} \end{aligned}$$

To protect receiving waters where a mixing zone is specified, it is necessary to assure that there will be no acutely lethal condition within the boundary of the mixing zone. In the case of the PSL effluent, the discharge canal is analogous to a mixing zone prior to the final ocean discharge.

In accordance with EPA guidance (Peltier and Weber, 1985), a factor of three is applied to the acute LC_{50} to define the instream waste concentration (IWC) protective against acutely toxic concentrations of an effluent constituent.

Thus:

$$IWC \leq \frac{LC_{50}}{3}$$

or, for EDTA,

$$\begin{aligned} IWC & \leq \frac{0.2 \text{ g/l}}{3} \\ & \leq 0.067 \text{ g/l.} \end{aligned}$$

This calculated IWC agrees very well with the no-observed-adverse-effect-concentration (NOAEC) determined in the Mysidopsis toxicity test (0.056 g/l).

At the St. Lucie plant site, the point at which the IWC must not exceed 0.067 g EDTA/l is in the discharge canal after convergence at the NPDES compliance point east of A1A. It is also required that the waste should not exhibit acute or chronic toxicity outside of the discharge canal. It is clear that the recommended IWC will be adequate to protect against acute and chronic toxicity beyond the ocean discharge because of (1) the very high dilution factor, and (2), although relatively persistent in surface waters, EDTA is not expected to bioaccumulate in aquatic organisms (NLM, 1990).

The allowable concentration of EDTA in the discharge from the St. Lucie steam generator chemical cleaning process is calculated by:

$$C_d = \frac{R_c \times C_c}{R_d}$$

where,

C_d = maximum allowable
concentration of EDTA
in the steam generator
chemical cleaning discharge,

R_d = discharge rate of release,

C_c = maximum allowable
concentration of EDTA
in the canal (0.067 g/l),

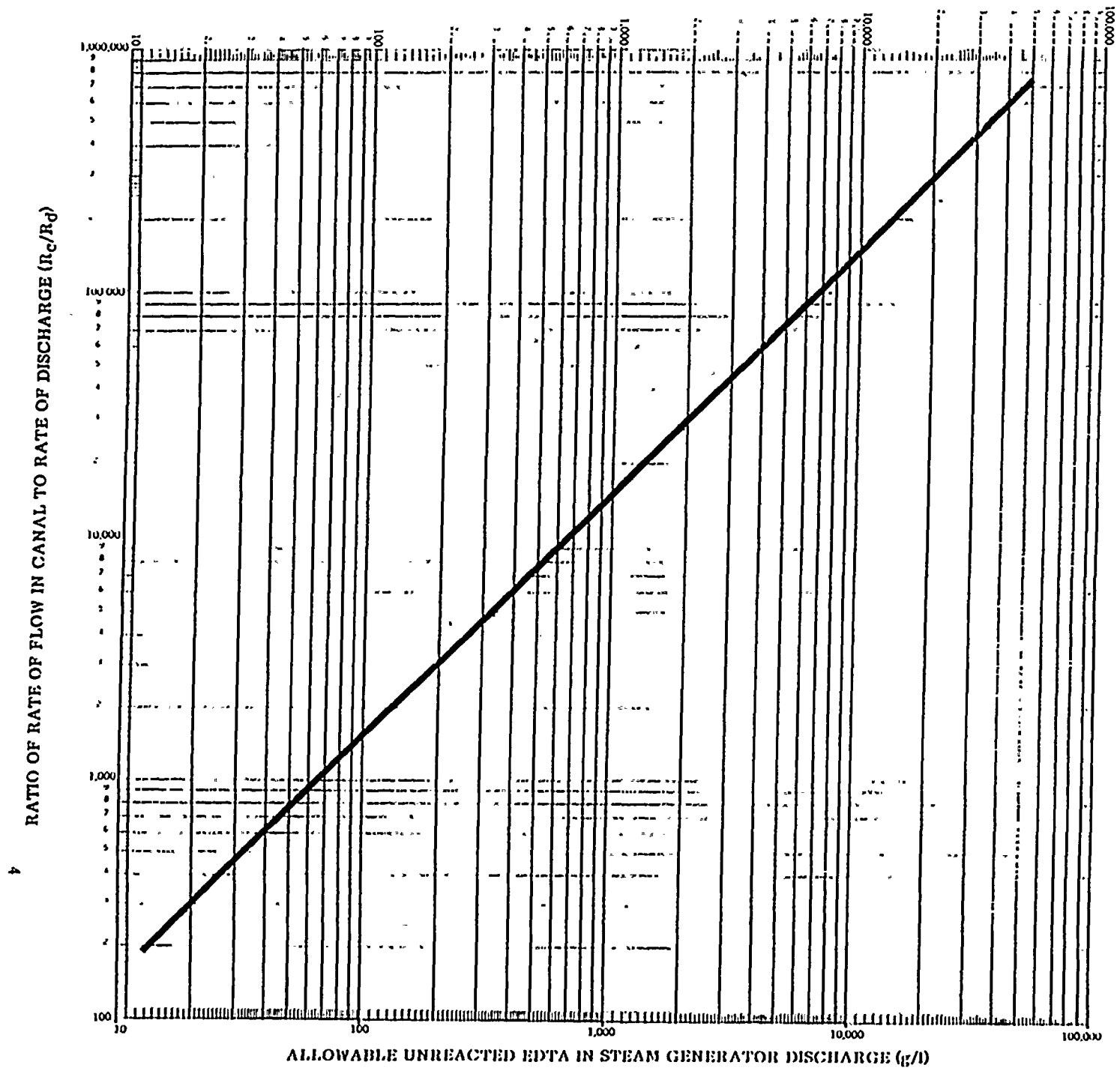
R_c = rate of flow in the canal.

This equation has numerous solutions, however, since the discharge flow from the steam generator chemical cleaning process can vary from one to 100 gallons per minute (GPM), and the total system flow can vary from 29,000 GPM to 1,026,000 GPM (although actual flows rarely would exceed 50 GPM for the discharge and 500,000 GPM for the total system). For easy reference, a graph has been generated in Figure 1 that relates the ratio of the rate of flow in the canal, or total system flow, to the rate of discharge from the steam generator chemical cleaning process (R_c/R_d , presented on the ordinate) to the calculated allowable EDTA concentration in the steam generator chemical cleaning process discharge (C_d , presented on the abscissa).

Thus, one needs only to determine the ratio of current total system to discharge flows, locate this value on the ordinate, come horizontally to the point of intersection with the graph and then vertically to the abscissa to read the corresponding value for the allowable EDTA discharge concentration. Potential vendors should be apprised that the total unreacted EDTA in the treated discharge should not exceed the amount indicated for any given set of flow conditions.

It should be noted that complexing reduces the toxicity of EDTA. Because EDTA will complex with calcium and magnesium (relatively non-toxic metals that contribute to hardness and salinity of receiving waters), the concentration of EDTA tolerated by organisms increases directly with both water hardness and salinity (Mount and Anderson-Carnahan, 1988). The receiving water at the St. Lucie Plant has an average salinity of 35.4 ppt., with annual and monthly means varying less than 1 ppt.

FIGURE 1
EDTA DISCHARGE LIMITS DURING CHEMICAL
CLEANING OF THE ST. LUCIE STEAM GENERATORS





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III. References

Mount, D. I. and L. Anderson-Carnahan. 1988.
Methods for Aquatic Toxicity Identification
Evaluations, Phase I Toxicity Characterization
Procedures. EPA/600/3-88/034. Environmental
Research Laboratory, USEPA,
Duluth, Minnesota.

National Library of Medicine. 1990. MEDLARS
on-line network, Hazardous Substances
Data Bank (HSDB). NLM, U.S. Dept.
Health and Human Services, Bethesda,
Maryland.

Peltier, W. H. and C. I. Weber, eds. 1985.
Methods for Measuring the Acute Toxicity
of Effluents to Freshwater and Marine
Organisms, Third Edition. EPA/600/
4-85/013. Environmental Monitoring
and Support Laboratory, USEPA,
Cincinnati, Ohio.

IV. APPENDIX

Summary data from 96-hour acute toxicity tests of a hypothetical EDTA effluent on the mysid shrimp, Mysidopsis bahia, and the sheepshead minnow, Cyprinodon variegatus.

3.0 RESULTS AND DISCUSSION

3.1 EDTA SOLUTION

After 96 hours of exposure, mysid survival ranged from 0 to 100 percent in all low concentration range treatments. Mysid survival in all high concentration range treatments was 0 percent in less than 24 hours. Control survival for exposed mysids was 95 percent for both concentration ranges (Table 3-1). The 96-hour LC50 for the EDTA Solution effluent sample to mysids was 0.20 percent effluent with 95 percent confidence limits of 0.18 and 0.32 percent effluent. With the exception of extremely high salinities in the high concentration range exposures, water quality parameters remained within acceptable limits throughout the tests. Mysid survival and water quality data are provided in Appendix C.

After 96 hours of exposure, sheepshead minnow survival ranged from 90 to 100 percent in all low concentration range treatments. Sheepshead minnow survival in all high concentration range treatments was 0 percent in less than 24 hours. Control survival for exposed sheepshead minnows was 100 percent for both concentration ranges (Table 3-1). The 96-hour LC50 for the EDTA Solution effluent sample to sheepshead minnows was 1.96 percent effluent with 95 percent confidence limits of 1.0 and 5.6 percent effluent.

With the exception of low pH in the 1.0 percent concentration of the low concentration range test, and the extremely high salinities in the high concentration range exposures, water quality parameters remained within

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acceptable limits throughout the tests. Sheepshead minnow survival and water quality data are provided in Appendix D.

Table 3-1. Survival of Mysids (*Mysidopsis bahia*) and Sheepshead Minnows (*Cyprenodon variegatus*) During 96-Hour Exposures to Two Concentration Ranges of EDTA Solution Effluent

Concentration Range	Percent Survival										
	Low Concentration Range									High	
	Mysids				Sheepshead Minnows				Percent	Sheepshead Mysids	
Mixture	24 Hour	48 Hours	72 Hours	96 Hours	24 Hour	48 Hours	72 Hours	96 Hours	Mixture	24 Hours	24 Hours
Control	100	100	95	95	100	100	100	100	Control	95	100
0.056	100	100	100	100	100	100	100	100	5.6	0	0
0.1	100	100	95	90	100	100	100	100	10	0	0
0.18	100	95	60	55	100	100	100	100	18	0	0
0.32	90	70	60	25	100	100	100	100	32	0	0
0.56	10	10	0	0	100	100	100	100	56	0	0
1.0	0	0	0	0	95	90	90	90	100	0	0

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APPENDIX C
EDTA/MYSID TEST DATA

SUBJECT: ACUTE TOXICITY DATA SHEET—BIOLOGICAL DATA

SPONSOR: FR & L PROJECT NUMBER: 3903048-0100-3140
TEST SUBSTANCE: EDIA (12) TEST SPECIES: M. heine

ANIMAL HISTORY

SAMPLE INFORMATION AND DESCRIPTION FOUND ON PAGE 658 OF THE TEST-SUBSTANCE USAGE LOG. ^{Effluents}

DATE MAINTENANCE/AKLIMATION BEGAN: 12-17-87

LOT NO./BATCH NO.:
(CIRCLE ONE) 89.76

CONDITION OF ANIMALS: good

LIFE STAGE/AGE: DOH 12-16-87

SEE PAGE NO.: 36 OF ANIMAL
COLLECTION/RECEIPT LOG FOR RAW DATA

MORTALITY (%) IN TANK 48 HOURS PRIOR
TO TESTING: NOB 3

SEE PAGE NO. 183 OF Invest Holding FOR RAW DATA ON ANIMAL HOLDING

TEST CONDITIONS

<input type="checkbox"/> RANGE-FINDING	<input checked="" type="checkbox"/> STATIC	TIME ADDED SUBSTANCE/ANIMALS	TEST LOCATION	TEST SYSTEM
<input checked="" type="checkbox"/> DEFINITIVE	<input type="checkbox"/> FLOW-THROUGH	<u>1600 /</u>	<u>water bath</u> <u>Mar. Lab</u>	<input checked="" type="checkbox"/> OPEN <input type="checkbox"/> CLOSED

TEST CONTAINER DIMENSIONS	TEST SOLUTION HEIGHT	TEST CHAMBER VOLUME (L)	TEST SOLUTION VOLUME (L)	TEST CONTAINER COMPOSITION
<u>Caroline</u>	<u>2.4m</u>	<u>0.2, 1, 3, 8, 38 -</u> <u>1.6</u>	<u>0.1, 1.0, 3, 30 -</u>	<u>glass</u>

PROTOCOL: EPA/600/4-85/013

DILUTION WATER: Recon. (A-1) TYPE LIGHTING: F Luorescent PHOTO PERIOD: 16L:8D
Filtered S4

CIRCLE ONE: TEST SUBSTANCE AS ACTIVE INGREDIENT/WHOLE MATERIAL SOLVENT/CARRIER

TEST CONCENTRATION % mg/L μg/L	CON- TROL	SOLV CONT	2x10 ⁶ CFU	0.056 2.00	0.10	0.18	0.32	0.56	1.0	SOLVENT/CARRIER CONCENTRATION
AMOUNT OF SUBSTANCE/ STOCK ADDED (ml)	N.A.	N.A.	0	0.56	1.0	1.8	3.2	5.6	10	
^{Dilution water} STOCK SOLUTION USED (e.g., 1°, 2°, 3°)	N.A.	N.A.	1000/1000	999	998	997	994	990		
AMOUNT OF SOLVENT ADDED ()	N.A.		N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	

ADDITIONAL COMMENTS: (DOCUMENT ANY DEVIATIONS FROM PROTOCOL: e.g., AERATION)



11/11/11

Mbatic		0-HOUR		24-HOUR		48-HOUR		72-HOUR		96-HOUR		
DATE		12-21-89		12/22/89		12/23/89		12/24/89		12/25/89		
ANIMALS FED		BS		BS		BS		BS		No		
TIME		1600		1400		1420		1405		1420		
DATA BY		ST		PAT		ARRB		ARRB		ARRB.		
NOMINAL CONCENTRATION mg/L μ g/L μ g/L (70)		REP	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE
CONTROL		A	None	10	None	10	None	10	None	10	None	10
		B		10		10	↓	10	2NF	8	10	9
Sub Control		A		10		10						
		B		10		10						
0.056		A		10	None	10	None	10	None	10	None	10
		B		10		10		10	↓	10		10
0.10		A		10		10		10	9	↓		9
		B		10		10		10	None	10	10	9
0.18		A		10		10	↓	10	20	9	10	7
		B		10		10	INF	9	30 2NF	4	None	4
0.32		A		10	10	9	3LETH	9	20 2LETH	7	50	2
		B		10	1NF 1LETH	9	4NF	5	20	5	20	3
0.56		A		10	90	2	2PLE	2	20	0		
		B		10	100	0						
1.0		A		10	100	0						
		B	↓	10	100	0						
		A										
		B										
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OBSERVATION KEY

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|--|-------------------------|---------------------------|
| NONE - OBSERVATION WAS MADE AND NOTHING OUT OF THE ORDINARY WAS OBSERVED | GY - GYRATING | PRE - PRECIPITATE |
| AS - AT THE SURFACE | DRK - DARK PIGMENTATION | FOS - FILM ON SURFACE |
| MEP - MUSCLE SPASM | HEM - HEMORRHAGIC | UC - UNDISSOLVED CHEMICAL |
| CLE - COMPLETE LOSS OF EQUILIBRIUM | RAR - RAPID RESPIRATION | NF - NOT FEED |
| PLE - PARTIAL LOSS OF EQUILIBRIUM | G - GULPING | LT - LIGHT PIGMENTATION |
| LETH - LETHARGIC | CLDY - CLOUDY SOLUTION | BS - BULK SHRIMP |
| HYP - HYPERACTIVE | OBS - OBSERVATION | |
| ERR - ERRATIC | | |

USE AQUATIC TOXICOLOGY DEPARTMENT
GAINESVILLE, FLORIDA

PAGE: _____
USE SA FORM: 116
EFFECTIVE: MARCH 1980

SUBJECT: ACUTE TOXICITY DATA SHEET—CHEMICAL AND PHYSICAL DATA

SPONSOR: 2012 PROJECT NO. _____ TEST SUBSTANCE: 0.11
TEST SPECIES: _____

DATE	12-20-89	12/22/89	12/23/89	12/24/89	12/25/89
TIME	1600	1400	1400	1315	1346
DATA #	575 / PAR	21/188	ADIS	ADIS	ADIS

NOMINAL CONCENTRATION mg/L	REPL	12/22/89					12/23/89					12/24/89					12/25/89					
		Temp °C	Sal	pH	DO	ALK	Temp °C	Sal	pH	DO	Temp °C	Sal	pH	DO	Temp °C	Sal	pH	DO				
CONTROL	A	22	21	8.1			22	20	8.2	7.0	20	22	8.2	6.9	21	22	8.1	7.3	21	22	8.1	7.3
	B	22	-	8.0	8.0		22	-	8.1	6.4	20	-	8.1	6.6	21	-	8.1	7.4	21	-	8.1	7.3
0.050	A	22	22	8.0	8.1		22	22	8.1	7.0	20	22	8.2	6.9	21	24	8.1	7.4	21	24	8.1	7.3
	B	22	-	8.0	7.9		22	-	8.1	7.2	20	-	8.2	7.2	21	-	8.2	7.5	21	-	8.2	7.7
0.10	A	22	22	7.7	8.1		22	22	8.0	7.1	20	22	8.1	7.3	21	24	8.1	7.6	21	24	8.2	7.3
	B	22	-	7.3	7.9		22	-	8.0	7.1	20	-	8.0	7.4	21	-	8.2	7.7	21	-	8.2	7.3
0.15	A	22	22	6.9	7.9		22	23	7.9	7.1	20	22	8.1	7.4	21	24	8.0	6.9	21	24	8.1	7.3
	B	22	-	7.1	7.9		22	-	7.9	7.1	20	-	8.1	7.4	21	-	8.1	7.5	21	-	8.1	7.3
0.20	A	22	22	6.6	8.0		22	22	7.8	7.1	20	22	7.9	7.2	21	24	8.0	7.3	21	24	8.0	7.3
	B	22	-	5.8	8.0		22	-	7.8	7.2	20	-	7.9	7.2	21	-	8.0	7.4	21	-	8.0	7.3
0.25	A	22	22	6.1	7.7		22	23	7.5	7.2	20	22	7.7	7.4	21	25	7.7	7.6				
	B	22	-	6.1	7.8		22	-	7.7	7.4	20	-										
1.0	A	22	22	4.9	7.8		22	23	4.9	7.4	20	22										
	B	22	-	4.6	7.9		22	-	4.9	7.6	20	-										

TEMP. DEVICE	Room #3	→	→	→	→
SALINITY MEASUREMENT	Hand #3	→	→	→	→
PH METER	16370 #1	→	→	→	→
DO METER	20-1	→	→	→	→
ALCALINITY METHOD	-	-	-	-	-
CONDUCTIVITY METER	-	-	-	-	-

TEMPERATURE WAS CONTINUOUSLY RECORDED ON CHANNEL _____ OF THE SON TEMPERATURE MONITOR.

SALINITY • ppm/dph * 22 ADIS 12/23/89
 DO • ppm b enhanced ADIS 12/23/89
 pH • ppm
 DO • ppm/cd

SUBJECT: ACUTE TOXICITY DATA SHEET—BIOLOGICAL DATA

SPONSOR: FP&L PROJECT NUMBER: 3903045-0100-5140
TEST SUBSTANCE: EDTA Solution TEST SPECIES: Myxodopsis bahia

ANIMAL HISTORY

SAMPLE INFORMATION AND DESCRIPTION FOUND ON PAGE 658 OF THE TEST SUBSTANCE USAGE LOG. ^{Effluent}
DATE MAINTENANCE/ACCLIMATION BEGAN: 12-19-89
LOT NO./BATCH NO.: 89-76 (CIRCLE ONE) CONDITION OF ANIMALS: good
SEE PAGE NO.: 36 OF ANIMAL LIFE STAGE/AGE: YOH 12-16-89
COLLECTION/RECEIPT LOG FOR RAW DATA MORTALITY (%) IN TANK 48 HOURS PRIOR TO TESTING: NOB %
SEE PAGE NO. 183 OF ^{Event} Holding FOR RAW DATA ON ANIMAL HOLDING

TEST CONDITIONS

<input type="checkbox"/> RANGE-FINDING	<input checked="" type="checkbox"/> STATIC	TIME ADDED SUBSTANCE/ANIMALS	TEST LOCATION	TEST SYSTEM
<input checked="" type="checkbox"/> DEFINITIVE	<input type="checkbox"/> FLOW-THROUGH	<u>600 / 1615</u>	<u>Water bath</u> <u>main Lab</u>	<input checked="" type="checkbox"/> OPEN <input type="checkbox"/> CLOSED

TEST CONTAINER DIMENSIONS <u>caroline dish</u>	TEST SOLUTION HEIGHT <u>~4 cm</u>	TEST CHAMBER VOLUME (L) 0.2, 1, 3, 8, 38 - <u>(1.6)</u>	TEST SOLUTION VOLUME (L) 0.1, <u>(1.0)</u> , 3, 30 -	TEST CONTAINER COMPOSITION <u>glass</u>
--	---	---	---	---

PROTOCOL: EPA/600/4-85/013
DILUTION WATER: Seawater filtered SW TYPE LIGHTING: Fluorescent PHOTOPERIOD: 16L:8D

CIRCLE ONE: TEST SUBSTANCE AS ACTIVE INGREDIENT/WHOLE MATERIAL SOLVENT/CARRIER

TEST CONCENTRATION	CON- TROL	SOLV CONT	Salt Control	5.6	10	18	32	56	100	
AMOUNT OF SUBSTANCE STOCK ADDED () ^{Effluent}	N.A.	N.A.	0	56	100	180	320	560	1000	SOLVENT/CARRIER CONCENTRATION
AMOUNT OF SOLVENT STOCK SOLUTION USED (e.g., 1", 2", 3") ^{Dilution water}	N.A.	N.A.	1000	944	900	320	680	400	0	
AMOUNT OF SOLVENT ADDED () <u>NA</u>	N.A.		N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

ADDITIONAL COMMENTS: (DOCUMENT ANY DEVIATIONS FROM PROTOCOL: e.g., AERATION)

mbahi c.		0-HOUR		24-HOUR		48-HOUR		72-HOUR		96-HOUR			
DATE		12-21-79		12/22/79									
ANIMALS FED		BS		AS									
TIME		1600		1350									
DATA BY		STF		PAR									
NOMINAL CONCENTRATION		REP	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	
mg/L													
µg/L													
µg/L													
CONTROL		A	None	10	NF	9							
		B		10	None	10							
5.6		A											
Control		B											
5.6		A		10	100 pct	0							
		B		10	100 pct	0							
10		A		10	100 pct	0							
		B		10		0							
18		A		10		0							
		B		10		0							
32		A		10		0							
		B		10		0							
56		A		10		0							
		B		10		0							
100		A		10		0							
		B	✓	10		0							
		A											
		B											
		A											
		B											

OBSERVATION KEY

- | | | |
|--|-------------------------|-------------------------|
| NONE - OBSERVATION WAS MADE AND NOTHING OUT OF THE ORDINARY WAS OBSERVED | GT - GORING | PRE - PRECIPITATE |
| AS - AT THE SURFACE | DRK - DARK PIGMENTATION | FOS - FILM ON SURFACE |
| MSP - MUSCLE SPASM | HEM - HEMORRHAGIC | UC - UNSOLVED CHEMICAL |
| CLE - COMPLETE LOSS OF EQUILIBRIUM | RAR - RAPID RESPIRATION | NF - NOT FOUND |
| PLE - PARTIAL LOSS OF EQUILIBRIUM | G - GULPING | LT - LIGHT PIGMENTATION |
| LETH - LETHARGIC | CLDY - CLOUDY SOLUTION | BS - BRINE SERUM |
| HYP - HYPERACTIVE | OBS - OBSERVATION | |
| ERR - ERRATIC | | |

USE AQUATIC TOXICOLOGY DEPARTMENT
GAINESVILLE, FLORIDA

PAGE: _____
USE ON FORM: 316
EFFECTIVE: MARCH 1988

SUBJECT: ACUTE TOXICITY DATA SHEET—CHEMICAL AND PHYSICAL DATA

SPONSOR: FPEL

PROJECT NO. _____

TEST SUBSTANCE: EDTA
TEST SPECIES: MALINCHA

DATE	12/21/89										12/22/89									
	1135-1600										1400									
TIME	DC/STF										DC/APP									
	DC/STF										DC/APP									
NOMINAL CONCENTRATION (µg/L)	REP	TEMP °C	SAL/HARD	PH	DO	ALK	CORG	TEMP °C	SAL/HARD	PH	DO	TEMP °C	SAL/HARD	PH	DO	TEMP °C	SAL/HARD	PH	DO	
CONTROL	A	21	22	8.3	8.0			22	21	8.2	6.9									
	B	21	-	8.3	8.1			22	-	8.2	7.0									
Salt	A	21	-	-	-			22	-	-	-									
	B	21	-	-	-			22	-	-	-									
5.6	A	21	26	4.7	7.7			22	27	4.8	6.7									
	B	21	-	4.7	7.4			22	-	4.8	6.8									
10	A	21	28	4.8	7.5			22	31	4.8	7.3									
	B	21	-	4.8	7.5			22	-	5.0	7.3									
18	A	21	36	5.3	7.1			22	37	5.3	7.1	**				7.0				
	B	21	-	5.3	7.1			22	-	5.3	7.1	**				6.8				
32	A	21	54	6.3	6.6			22	51	5.2	6.6	**				6.5				
	B	21	-	6.3	6.5			22	-	6.3	6.6	**				6.6				
56	A	21	75	6.7	6.7			22	78	6.7	6.7	**				6.5				
	B	21	-	6.7	6.6			22	-	6.7	6.6	**				6.5				
100 *	A	21	05	7.1	6.2			22	00	7.1	6.2	**				6.6				
	B	21	-	7.1	6.4			22	-	7.1	6.4	**				6.4				

TEMP. DEVICE: beam 3
 SAL/HARD MEASUREMENT: ref 3
 PH METER: 3A250-1
 DO METER: DO-1
 ALKALINITY METER: _____
 CONDUCTIVITY METER: 3CT-2

TEMPERATURE WAS CONTINUOUSLY RECORDED OR CHANGED _____ OF THE SOIL TEMPERATURE METER.

SAL/HARD • ppm/psm
 DO • %
 ALK • ppm
 CORG • mg/l/oz

* STF - 05 = OFF SCALE
 ** APP values redone because of salinity correction

APPENDIX D

EDTA/SHEEPSHEAD TEST DATA



11

SUBJECT: ACUTE TOXICITY DATA SHEET—BIOLOGICAL DATA

SPONSOR: FDL PROJECT NUMBER: _____
TEST SUBSTANCE: EDTA Soln (1%) TEST SPECIES: Cyprinus

ANIMAL HISTORY

SAMPLE INFORMATION AND DESCRIPTION FOUND ON PAGE 653 OF THE ^{Effluent 2} ~~TEST SUBSTANCE USAGE LOG~~.
DATE MAINTENANCE/AOCLIMATION BEGAN: 12-9-87
LOT NO./BATCH NO.: 99-75 (CIRCLE ONE) CONDITION OF ANIMALS: good
LIFE STAGE/AGE: ~31 days
SEE PAGE NO.: 36 OF ANIMAL COLLECTION/RECEIPT LOG FOR RAW DATA MORTALITY (%) IN TANK 48 HOURS PRIOR TO TESTING: 11%
SEE PAGE NO. 574 OF Fish Hold Log FOR RAW DATA ON ANIMAL HOLDING

TEST CONDITIONS

<input type="checkbox"/> RANGE-FINDING	<input checked="" type="checkbox"/> STATIC	TIME ADDED SUBSTANCE/ANIMALS	TEST LOCATION	TEST SYSTEM
<input checked="" type="checkbox"/> DEFINITIVE	<input type="checkbox"/> FLOW-THROUGH	<u>1000 /</u>	<u>water bath</u> <u>main lab</u>	<input checked="" type="checkbox"/> OPEN <input type="checkbox"/> CLOSED
TEST CONTAINER DIMENSIONS	TEST SOLUTION HEIGHT	TEST CHAMBER VOLUME (L)	TEST SOLUTION VOLUME (L)	TEST CONTAINER COMPOSITION
	<u>~4cm</u>	<u>0.2, 1, 3.8, 38</u> <u>(1.0)</u>	<u>0.1, (1.0), 3, 30</u>	<u>glass</u>

PROTOCOL: EPA/600/4-85/013
DILUTION WATER: 2 100% Filt SW TYPE LIGHTING: FL PHOTOPERIOD: 16L:8D

CIRCLE ONE: TEST SUBSTANCE AS ACTIVE INGREDIENT/WHOLE MATERIAL											SOLVENT/CARRIER	
TEST CONCENTRATION	CON-TROL	SOLV CONT	Salt CHL	5%	0.10	0.18	0.32	0.56	1.0			
μg/L μg/L μg/L												
AMOUNT OF SUBSTANCE/ STOCK ADDED (ml)	N.A.	N.A.	0	0.56	1.0	1.8	3.2	5.6	10			SOLVENT/CARRIER CONCENTRATION
STOCK SOLUTION USED (e.g., 1°, 2°, 3°)	N.A.	N.A.	100	1000	999	998	997	994	990			
AMOUNT OF SOLVENT ADDED ()	N.A.		N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	

ADDITIONAL COMMENTS: (DOCUMENT ANY DEVIATIONS FROM PROTOCOL: e.g., AERATION)

ABOVE DATA RECORDED BY: STF D-1 DATE: 11-21-87

C. var.		0-HOUR		24-HOUR		48-HOUR		72-HOUR		96-HOUR	
DATE		12/21/89		12/22/89		12/23/89		12/24/89		12/25/89	
ANIMALS FED		NO		NO		NO		NO		NO	
TIME		1640		1430		1430		1425		1410	
DATA BY		PAR		PAR		HEB		HEB		ARB.	
NOMINAL CONCENTRATION ug/L	REP	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE
CONTROL	A		10	NONE	10	NONE	10	NONE	10	NONE	10
	B		10		10		10		10		10
Salt	A										
	B										
0.056	A		10		10		10		10		10
	B		10		10		10		10		10
0.10	A		10		10		10		10		10
	B		10		10		10		10		10
0.18	A		10		10		10		10		10
	B		10		10		10		10		10
0.32	A		10		10		10		10		10
	B		10		10		10		10		10
0.56	A		10		10		10		10		10
	B		10		10		10		10		10
1.0	A		10		10		10		10		10
	B		10	10	9	10	8		8		8
	A										
	B										
	A										
	B										

OBSERVATION KEY

- | | | |
|--|-------------------------|---------------------------|
| NONE - OBSERVATION WAS MADE AND NOTHING OUT OF THE ORDINARY WAS OBSERVED | GY - GYRATING | PRE - PRECIPITATE |
| AS - AT THE SURFACE | DRK - DARK PIGMENTATION | POS - FILM ON SURFACE |
| MSP - MUSCLE SPASM | HEM - HEMORRHAGIC | UC - UNDISSOLVED CHEMICAL |
| CLE - COMPLETE LOSS OF EQUILIBRIUM | RAR - RAPID RESPIRATION | NF - NOT FOUND |
| PLE - PARTIAL LOSS OF EQUILIBRIUM | G - GULPING | LT - LIGHT PIGMENTATION |
| LETH - LETHARGIC | CLDY - CLOUDY SOLUTION | BS - BRINE SHRIMP |
| HYP - HYPERACTIVE | OBS - OBSERVATION | |
| ERR - ERRATIC | | |

THE AQUATIC TOXICOLOGY DEPARTMENT
GAINESVILLE, FLORIDA

PAGE: _____
USE OR FOR: _____
EFFECTIVE: MARCH 1988

SUBJECT: ACUTE TOXICITY DATA SHEET—CHEMICAL AND PHYSICAL DATA																									
SPONSOR: <u>FP&L</u>		PROJECT NO. _____										TEST SUBSTANCE: <u>EDTA</u>													
												TEST SPECIES: <u>C. V. L.</u>													
DATE	12/21/89					12/22/89					12/23/89					12/24/89					12/25/89				
TIME	1630					1500					1405					1320					1245				
DATA #	DL					DL					ALPS					L.P.K.					ALPS				
NOMINAL CONCENTRATION P/L W/L W/L	TEMP °C	SAL/ HARD	PH	DO	ALK	COND	TEMP °C	SAL/ HARD	PH	DO	TEMP °C	SAL/ HARD	PH	DO	TEMP °C	SAL/ HARD	PH	DO	TEMP °C	SAL/ HARD	PH	DO			
																							TEMP °C	SAL/ HARD	PH
CONTROL	22	20	8.2	7.1			22	20	8.1	7.3	20	20	8.1	6.8	21	20	8.1	7.2		20	20	8.1	7.1		
	22	-	8.0	6.9			22	-	8.1	7.3	20	-	8.1	6.9	21	-	8.1	7.2		-	-	8.1	7.1		
Salt	_____																								
0.056	22	21	8.0	7.9			22	21	8.0	7.0	20	21	8.1	6.9	21	23	8.0	6.9		23	23	8.1	7.0		
	22	-	8.0	7.9			22	-	8.0	7.1	20	-	8.1	6.9	21	-	8.1	7.0		-	-	8.1	7.0		
0.10	22	21	8.0	7.9			22	21	8.0	7.1	20	21	8.1	7.0	21	23	8.1	7.3		23	23	8.1	7.3		
	22	-	8.0	7.9			22	-	8.0	7.1	20	-	8.1	7.1	21	-	8.1	7.3		-	-	8.1	7.3		
0.18	22	21	8.0	7.9			22	21	7.9	7.1	20	21	8.0	7.2	21	23	8.0	7.4		23	23	8.1	7.4		
	22	-	8.0	7.9			22	-	7.9	7.1	20	-	8.0	7.2	21	-	8.0	7.4		-	-	8.1	7.4		
0.32	22	21	8.0	7.8			22	21	7.9	7.1	20	21	7.9	7.3	21	23	7.9	7.6		23	23	7.9	7.6		
	22	-	8.0	7.8			22	-	7.9	7.1	20	-	7.9	7.1	21	-	7.9	7.6		-	-	7.9	7.6		
0.56	22	21	8.0	8.1			22	21	8.0	7.3	20	22	7.7	7.4	21	24	7.6	7.6		25	24	7.6	7.6		
	22	-	8.0	8.1			22	-	7.6	7.0	20	-	7.6	7.5	21	-	7.6	7.6		-	-	7.6	7.6		
1.0	22	21	8.0	8.1			22	21	8.0	7.4	20	24	7.9	7.4	21	25	7.9	7.6		25	24	7.6	7.6		
	22	-	8.0	8.1			22	-	7.9	7.4	20	-	7.9	7.4	21	-	7.9	7.6		-	-	7.9	7.6		
TEMP. TYPE	Therm 3					Therm 3					Therm 3					Therm 3									
SAL. HARD MEASUREMENT	Ref 3					Ref 3					Ref 3					Ref 3									
PH METER	SA750-1					SA750-1					SA750-1					SA750-1									
DO METER	DO-1					DO-1					DO-1					DO-1									
ALCALINITY METHOD	tit					tit					tit					tit									
CONDUCIVITY METER	SCT-2					SCT-2					SCT-2					SCT-2									

TEMPERATURE WAS CONTINUOUSLY RECORDED ON CHANNEL _____ OF THE SOI TEMPERATURE MONITOR.

- SAL. HARD • ppt/opp.
- DO • ppt.
- PH • ppt.
- ALK • ppt.
- DO • ppt/opp.

SUBJECT: ACUTE TOXICITY DATA SHEET—BIOLOGICAL DATA

SPONSOR: FP&L PROJECT NUMBER: _____
TEST SUBSTANCE: EDTA Solution TEST SPECIES: C. variegatus

ANIMAL HISTORY

SAMPLE INFORMATION AND DESCRIPTION FOUND ON PAGE 658 OF THE TEST-SUBSTANCE USAGE LOG. ^{Effluent}
DATE MAINTENANCE/ACCLIMATION BEGAN: 12-19-85
LOT NO./BATCH NO.: 89-75 (CIRCLE ONE) CONDITION OF ANIMALS: good
SEE PAGE NO.: 362 OF ANIMAL LIFE STAGE/AGE: ~31 days
COLLECTION/RECEIPT LOG FOR RAW DATA MORTALITY (%) IN TANK 48 HOURS PRIOR TO TESTING: 0
SEE PAGE NO. 574 OF fish holding FOR RAW DATA ON ANIMAL HOLDING

TEST CONDITIONS

<input type="checkbox"/> RANGE-FINDING	<input checked="" type="checkbox"/> STATIC	TIME ADDED SUBSTANCE/ANIMALS <u>1000:1</u>	TEST LOCATION <u>Water bath</u> <u>Main Lab</u>	TEST SYSTEM <input checked="" type="checkbox"/> OPEN <input type="checkbox"/> CLOSED
<input checked="" type="checkbox"/> DEFINITIVE	<input type="checkbox"/> FLOW-THROUGH			

TEST CONTAINER DIMENSIONS <u>Carolina</u>	TEST SOLUTION HEIGHT <u>~4cm</u>	TEST CHAMBER VOLUME (L) 0.2, 1, 3, 8, 38 - <u>(1.6)</u>	TEST SOLUTION VOLUME (L) 0.1, <u>(1.0)</u> , 3, 30 -	TEST CONTAINER COMPOSITION <u>glass</u>
--	-------------------------------------	---	---	--

PROTOCOL: EPA 600/4-85/013
DILUTION WATER: Felt SW TYPE LIGHTING: Fluor PHOTOPERIOD: 16L 8D

CIRCLE ONE:		TEST SUBSTANCE AS ACTIVE INGREDIENT/WHOLE MATERIAL										SOLVENT/CARRIER
TEST CONCENTRATION % mg/L	µg/L	CON- TROL	SOLV CONT	<u>Salt</u> <u>CH</u>	<u>5.6</u>	<u>10</u>	<u>18</u>	<u>32</u>	<u>56</u>	<u>100</u>		
	µg/L	N.A.	N.A.	<u>0</u>	<u>56</u>	<u>100</u>	<u>180</u>	<u>320</u>	<u>560</u>	<u>1000</u>		SOLVENT/CARRIER CONCENTRATION
STOCK SOLUTION USED (e.g., 1°, 2°, 3°)		<u>1000</u> N.A.	N.A.	<u>1000</u>	<u>944</u>	<u>900</u>	<u>820</u>	<u>680</u>	<u>440</u>	<u>"</u>		
AMOUNT OF SOLVENT ADDED ()		N.A.		N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	

ADDITIONAL COMMENTS: (DOCUMENT ANY DEVIATIONS FROM PROTOCOL: e.g., AERATION)

C. Var.	0-HOUR		24-HOUR		48-HOUR		72-HOUR		96-HOUR		
	REP	NO. ALIVE	REP	NO. ALIVE	REP	NO. ALIVE	REP	NO. ALIVE	REP	NO. ALIVE	
DATE		12/24/59		12/22/59							
ANIMALS FED		NO		NO							
TIME		1645		1440							
DATA BY		PAR		PAR							
NOMINAL CONCENTRATION µg/L	REP	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE	OBS	NO. ALIVE
7	A		10	NONE	10						
	B		10	1	10						
Salt PAR	A										
	B										
5.0	A		10	100	0						
	B		10	1	0						
10	A		10		0						
	B		10		0						
15	A		10		0						
	B		10		0						
32	A		10		0						
	B		10		0						
56	A		10		0						
	B		10		0						
100	A		10		0						
	B		10		0						
	A										
	B										
	A										
	B										

OBSERVATION KEY

- | | | |
|--|-------------------------|---------------------------|
| NONE - OBSERVATION WAS MADE AND NOTHING OUT OF THE ORDINARY WAS OBSERVED | GY - GYRATING | PRE - PRECIPITATE |
| AS - AT THE SURFACE | DRK - DARK PIGMENTATION | FOS - FILM ON SURFACE |
| MSP - MUSCLE SPASM | HEM - HEMORRHAGIC | UC - UNDISSOLVED CHEMICAL |
| CLE - COMPLETE LOSS OF EQUILIBRIUM | RAR - RAPID RESPIRATION | NF - NOT FOUND |
| PLE - PARTIAL LOSS OF EQUILIBRIUM | G - GULPING | LT - LIGHT PIGMENTATION |
| LETH - LETHARGIC | CLDY - CLOUDY SOLUTION | BS - BRINE SHRIMP |
| HYP - HYPERACTIVE | OBS - OBSERVATION | |
| ERR - ERRATIC | | |

OSCEOLA TOXICOLOGY DEPARTMENT
GAINESVILLE, FLORIDA

PAGE: _____
OSCEOLA FORM: 118
EFFECTIVE: MARCH 1980

SUBJECT: ACUTE TOXICITY DATA SHEET—CHEMICAL AND PHYSICAL DATA																							
SPONSOR: <u>FP&L</u>					PROJECT NO. _____					TEST SUBSTANCE: <u>ED7A</u>					TEST SPECIES: <u>C 221</u>								
DATE		12/21/89					12/22/89																
TIME		1630					1445																
DATA BY		DC					DC																
NORMAL CONCENTRATION (µg/L)	TEMP °C	SAL/HARD	PH	DO	ALK	CNO	TEMP °C	SAL/HARD	PH	DO	TEMP °C	SAL/HARD	PH	DO	TEMP °C	SAL/HARD	PH	DO	TEMP °C	SAL/HARD	PH	DO	
																							CONC
2	22	20	8.2	6.8			22	20	8.1	6.1													
	22	-	8.2	7.0			22	-	8.1	6.3													
5.6																							
	22	19	8.7	7.8			22	28	8.4	7.3													
5.6	22	-	8.7	7.5			22	-	8.7	7.8													
	22	25	8.9	7.7			22	21	8.9	7.1													
10	22	-	8.2	7.7			22	-	8.0	7.0													
	22	32	8.7	7.2			22	40	8.3	7.2													
15	22	-	8.3	7.3			22	-	8.3	7.0													
	22	39	8.4	6.8			22	50	8.3	7.1													
32	22	-	8.4	6.7			22	-	8.2	7.0													
	22	64	8.8	6.5			22	72	8.7	6.9													
56	22	-	8.8	6.6			22	-	8.7	6.7													
	22	100	9.1	6.2			22	105	9.1	6.9													
100	22	-	9.1	6.2			22	-	9.1	6.9													
TEST DEVICE: <u>Heim 3</u> SAL/HARD MEASUREMENT: <u>KAL-53</u> PH METER: <u>SA 250-1</u> DO METER: <u>DO-1</u> ALKALINITY METHOD: <u>+100</u> CONDUCTIVITY METER: <u>SC-2</u>																							

TEMPERATURE WAS CONTINUOUSLY RECORDED ON CHANNEL _____ OF THE SOI TEMPERATURE MONITOR.

SAL/HARD • ppm/°C
 DO • ppm
 ALK • ppm
 CNO • mg/l/°C

* Sal 100% Effluent off scale

OS - ODS scale

