

July 10, 2001

COPY

Mr. David Crosby
Senior Engineer
New York State Department of Environmental Conservation
50 Wolf Road
Albany, NY 12233-7010

RE: Former Miller Container Site (No. 7-38-029)
City of Fulton WTF Modification Work Plan
Vapor Phase Carbon Removal

Telephone

518.458.1313

Dear Mr. Crosby:

Facsimile

518.458.2472

Per our discussion on Thursday, May 31, 2001 regarding the above referenced site, and as presented our correspondence dated May 29, 2001, Item No. 5, Earth Tech is presenting the following justification and work plan to discontinue the use of Vapor Phase Carbon (VPC) treatment at the City of Fulton Water Treatment Facility (WTF). Please find attached two vapor effluent models (Air Guide - 1 Software Program, Version 3.1) for the site produced in support of this proposal. Also, please find attached a copy of a wind rose for the Syracuse area down loaded from the Internet. No wind rose was readily available for the City of Fulton, however owing to the proximity of these two cities, this data is considered to be responsive to your request.

Both models were prepared with the following common parameters:

- Treatment system loading calculated using January 2000 to March 2001 twice the average influent flow rate (731,116 gal./day) reported by the City and the various individual compound, system influent concentrations (see attached Table 1). The flow rate was doubled to account for the planned increase in pumping rates, as discussed on May 31, 2001. The loading calculation is as follows:

Loading (lbs/hour)

$$= (\text{Flow (gal./day)}/24) * \text{Concentration (ppm)} * (8.34 \text{ (lbs/gal. H}_2\text{O)} / 1,000,000)$$

Loading (lbs/year)

$$= \text{Loading (lbs/hour)} * 24 * 365$$

- Actual effluent stack diameter (22 inches).
- Actual stack height (65 feet total).
- Actual stack height over treatment building (39 feet).
- Actual average, stack velocity reported by City of Fulton (20 ft/sec).



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- Calculated stack flow rate $(3167.77 \text{ ft}^3/\text{min}) = \pi r^2(\text{ft}^2) * \text{velocity} (\text{ft}/\text{min})$.
- Estimated latitude and longitude of the facility stack.
- Actual dimensions of the treatment facility.
- Worst case distance to property line (1 ft.)

The two models present the "Maximum Influent Conditions" and "Maximum Well Concentration Conditions" for all available data for the facility.

Model Results

The contaminant impact summaries are located on page 4 of each of the three model reports. This page lists the contaminants of concern by CAS number, the Annual Guidance Concentration (AGC) and Short Term Guidance Concentration (SGC) for each contaminant, and the calculated percentage of these guidance values the model predicts based on the inputted loading values. Models expressing summary totals of less than 100% indicate that the point source is in compliance with the current guidance impact limitations.

These reports indicate that even under the projected increase flow operating conditions (which has not occurred as of yet), the City of Fulton WTF has never exceeded the Air Guide - 1 ambient air impact limitations. The Maximum Influent model exhibited 14.7% of the allowable ambient air impacts using the increased flow rates, while the Maximum Well Concentration model exhibited 58.1% of the Air Guide - 1 limits.

Proposed Work Plan

Based on this loading data and the associated estimated ambient air impacts, the Miller Brewing Company plans on discontinuing the use of Vapor Phase Carbon treatment at the City of Fulton WTF as soon as final approval is given and the necessary work can be arranged. All vapor phase effluent from the air stripper will be routed to the tower, bypassing the carbon. The vapor phase carbon units will be left in place at the facility in the event that carbon treatment should need to be reinstated.

It was suggested in the meeting on May 31, 2001 that following any up-grade of the effluent stack and subsequent discontinuance of vapor phase carbon treatment, air samples should be taken on a monthly basis for some trial period. This monitoring would be in an effort to ensure that the stack effluent maintains compliance with Air Guide - 1. However, the compound of most concern, 1,1-dichloroethene (vinylidene chloride) has an extremely low AGC ($0.02 \text{ ug}/\text{m}^3$ or 0.005 ppbv). This very low concentration is well below the detection limit of any common air grab sample analytical method (e.g., TO-14), which typically report down to the 1 ppbv range. Consequently, it is proposed that the performance of the system

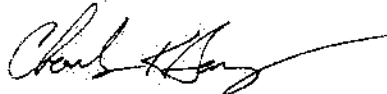


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and its ability to maintain Air Guide - 1 AGC levels will be tracked by monthly modeling of the system influent data. The WTF influent flow rate and effluent stack flow rate will be measured each month and this data will be used to prepare updated ambient air impact models such as the ones presented in this letter. These models will be provided to the NYSDEC monthly in a letter report. In the event that the model indicates an exceedance of the Air Guide - 1 AGCs or SGCs, the air stripper effluent shall be immediately re-routed through the carbon units. Carbon treatment shall continue until ambient air quality models calculated from the monthly WTF influent data indicate effluent levels below the Air Guide - 1 criteria for a period of 6 consecutive months. At that time, with prior approval from the NYSDEC, carbon treatment will again be discontinued.

If you have any questions or comments regarding this work plan for the discontinuance of vapor phase carbon treatment at the City of Fulton WTF, please feel free to contact me at (518) 437-7260. Otherwise we look forward to your approval to this work plan.

Sincerely,



Charles K. Bartlett, P.E.
Environmental Services Department Manager
Earth Tech, Inc.
Albany, New York

attachments: Maximum Influent Conditions Model
Maximum Well Concentration Model
Table 1 - Summary of Influent Characteristics
Syracuse Area Wind Rose

cc: Kathy Kinton, Miller Brewing Co., Milwaukee, WI
Henriette Hamell, NYSDOH, Syracuse, NY
John Florek, City of Fulton, Fulton, NY
Roger Parsons, City of Fulton, Fulton, NY
Michael Kelly, Earth Tech, Glens Falls, NY
Brett Mongillo, Earth Tech, Albany, NY
Gary Mullen, Earth Tech, Fulton, NY
G. David Foster, NYSDEC, Albany, NY
John Strang, NYSDEC, Albany, NY
John Mays, NYSDEC, Syracuse, NY
Rich White, Earth Tech, Cazenovia, NY
Daniel Barthold, Miller, Milwaukee, WI

E A R T H



T E C H

TABLE 1
CITY OF FULTON GWTF
SUMMARY OF INFLUENT CHARACTERISTICS
AVERAGE FLOW RATE - 1,462,232 gpd
JANUARY 2000 THROUGH MARCH 2001

PARAMETER	MAXIMUM INFLUENT CON. (ug/l)	MAXIMUM INFLUENT LOADINGS (lbs/hour)	MAXIMUM INFLUENT LOADINGS (lbs/year)
Chloroform	5.0	0.002541	22.2559
1,1-Dichloroethane	0.6	0.000305	2.6707
1,1-Dichloroethene	1.2	0.000610	5.3414
1,1,1-Trichloroethane	6.0	0.003049	26.7071

PARAMETER	MAXIMUM WELL CON. (ug/l)	MAXIMUM WELL LOADINGS (lbs/hour)	MAXIMUM WELL LOADINGS (lbs/year)
Bromoform	1.3	0.000661	5.7865
Chloroform	6.0	0.003049	26.7071
1,1-Dichloroethane	1.6	0.000813	7.1219
1,1-Dichloroethene	11.0	0.005589	48.9630
cis-1,2-Dichloroethene	0.9	0.000457	4.0061
Methylene Chloride	0.7	0.000356	3.1158
Tetrachloroethene	3.0	0.001524	13.3535
1,1,1-Trichloroethene	51.0	0.025914	227.0102
Trichloroethene	0.5	0.000254	2.2256

***** AIR GUIDE 1 - ANALYSIS *****

***** INPUT DATA *****

LOC.	FAC	E.P.	CAS #	SOURCE	HA, or h(AREA) hs TYPE FEET FEET IN.	D F	T F	V FPS	Q ACFM	EMISSIONS #/HOUR	EMISSIONS #/YEAR	DPL, or BW, or D(AREA) S(AREA) FT FT FT	BL	
Facility Name & Address: City of Fulton, New York GWTF														
SIC Code:	0	Application:	UTME: 387000.	UTMN: 4705000.	BL FACING DIRECTION: 180.0	%CONTROL: 0.0000								
	00067-66-3	POINT	39. 65. 22.	70. 20.00	3167.77	0.00254	22.	1.	100.	100.				
Facility Name & Address: City of Fulton, New York GWTF														
SIC Code:	0	Application:	UTME: 387000.	UTMN: 4705000.	BL FACING DIRECTION: 180.0	%CONTROL: 0.0000								
	00075-34-3	POINT	39. 65. 22.	70. 20.00	3167.77	0.00030	3.	1.	100.	100.				
Facility Name & Address: City of Fulton, New York GWTF														
SIC Code:	0	Application:	UTME: 387000.	UTMN: 4705000.	BL FACING DIRECTION: 180.0	%CONTROL: 0.0000								
	00075-35-4	POINT	39. 65. 22.	70. 20.00	3167.77	0.00061	5.	1.	100.	100.				
Facility Name & Address: City of Fulton, New York GWTF														
SIC Code:	0	Application:	UTME: 387000.	UTMN: 4705000.	BL FACING DIRECTION: 180.0	%CONTROL: 0.0000								
	00071-55-6	POINT	39. 65. 22.	70. 20.00	3167.77	0.00305	27.	1.	100.	100.				

CONTAMINANT TOXICITY PROFILE FOR AIR GUIDE 1 ANALYSIS

CONTAMINANT NAME	CAS NUMBER	SGC ug/m3	HOW SGC ASSIGNED	AGC ug/m3	HOW AGC ASSIGNED	DAR TOXICITY	COMMENTS
CHLOROFORM	00067-66-3	150.00000	NYSDEC	0.043000000	EPA	MODERATE	H, I, U
METHYL CHLOROFORM	00071-55-6	68000.00000	NYSDEC	1000.000000000	NYSDEC	LOW	H, I
DICHLOROETHANE, 1,1	00075-34-3	0.00000	NO SGC EXISTS	20.000000000	NYSDEC	LOW	H, I
VINYLDENE CHLORIDE	00075-35-4	0.00000	NO SGC EXISTS	0.020000000	EPA	HIGH	H, U

COMMENTS :

(H) HAP identified by 1990 CAAA.

(I) Refer to ACGIH Handbook.

(U) AGC equivalent to "one in a million risk".

EMISSION POINT AND CONTAMINANT IMPACT SUMMARY OF AIR GUIDE 1 ANALYSIS

LOC	FAC	E.P.	CAS NUMBER	EMISSIONS			SHORT-TERM IMPACT	CAVITY IMPACT	POINT or AREA SOURCE IMPACT	
				#/HOUR	#/YEAR	ANNUAL EMISSIONS #/HOUR	MAXIMUM (Cav, Pt, Area) ug/m3	ACTUAL ANNUAL ug/m3	POTENTIAL ANNUAL ug/m3	ACTUAL ANNUAL ug/m3
*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
			00067-66-3	0.002541	22.2559	0.002541	0.154162	0.000000	0.004173	0.004177
			00075-34-3	0.000305	2.6707	0.000305	0.018504	0.000000	0.000501	0.000501
			00075-35-4	0.000610	5.3414	0.000610	0.037009	0.000000	0.001002	0.001002
			00071-55-6	0.003049	26.7071	0.003049	0.184982	0.000000	0.005007	0.005012

SUMMARY TOTALS				0.006505	56.9751	0.006504	0.394657	0.000000	0.010692	0.010693

EMISSION POINT AND CONTAMINANT ASSESSMENT OF AIR GUIDE 1 ANALYSIS

LOC	FAC	E.P.	CAS NUMBER	EMISSIONS			SHORT-TERM IMPACT	CAVITY IMPACT	POINT or AREA SOURCE IMPACT	
				AGC ug/m3	SGC ug/m3	MAXIMUM (Cav, Pt, Area) % OF SGC	ACTUAL ANNUAL % OF AGC	ACTUAL ANNUAL % OF AGC	POTENTIAL ANNUAL % OF AGC	ACTUAL ANNUAL % OF AGC
*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****
			00067-66-3	0.043000000	150.0000	0.1028	0.0000	9.7042	9.7139	
			00075-34-3	20.000000000	0.0000	0.0000	0.0000	0.0025	0.0025	
			00075-35-4	0.020000000	0.0000	0.0000	0.0000	5.0087	5.0124	
			00071-55-6	1000.000000000	68000.0000	0.0003	0.0000	0.0005	0.0005	

SUMMARY TOTALS							0.1030	0.0000	14.7159	14.7293

CONTAMINANT IMPACT SUMMARY OF AIR GUIDE 1 ANALYSIS

CAS NUMBER	EMISSIONS #/HOUR	EMISSIONS #/YEAR	ANNUAL EMISSIONS #/HOUR	SUMMATION OF SHORT-TERM IMPACTS,	SUMMATION OF CAVITY IMPACTS	SUMMATION OF POINT or AREA SOURCE IMPACTS	
				MAXIMUM (Cav, Pt, Area) ug/m3	ACTUAL ANNUAL ug/m3	POTENTIAL ANNUAL ug/m3	ACTUAL ANNUAL ug/m3
*****	*****	*****	*****	*****	*****	*****	*****
00067-66-3	0.002541	22.2559	0.002541	0.154162	0.000000	0.004173	0.004177
00071-55-6	0.003049	26.7071	0.003049	0.184982	0.000000	0.005007	0.005012
00075-34-3	0.000305	2.6707	0.000305	0.018504	0.000000	0.000501	0.000501
00075-35-4	0.000610	5.3414	0.000610	0.037009	0.000000	0.001002	0.001002
*****	*****	*****	*****	*****	*****	*****	*****
SUMMARY TOTALS	0.006505	56.9751	0.006504	0.394657	0.000000	0.010682	0.010693

CONTAMINANT ASSESSMENT SUMMARY OF AIR GUIDE 1 ANALYSIS

CAS NUMBER	AGC ug/m3	SGC ug/m3	SUMMATION OF SHORT-TERM IMPACTS,	SUMMATION OF CAVITY IMPACTS	SUMMATION OF POINT or AREA SOURCE IMPACTS	
			MAXIMUM (Cav, Pt, Area) % OF SGC	ACTUAL ANNUAL % OF AGC	POTENTIAL ANNUAL % OF AGC	ACTUAL ANNUAL % OF AGC
*****	*****	*****	*****	*****	*****	*****
00067-66-3	0.043000000	150.0000	0.1028	0.0000	9.7042	9.7139
00071-55-6	1000.000000000	68000.0000	0.0003	0.0000	0.0005	0.0005
00075-34-3	20.000000000	0.0000	0.0000	0.0000	0.0025	0.0025
00075-35-4	0.020000000	0.0000	0.0000	0.0000	5.0087	5.0124
*****	*****	*****	*****	*****	*****	*****
SUMMARY TOTALS			0.1030	0.0000	14.7159	14.7293

***** AIR GUIDE 1 - ANALYSIS *****

***** INPUT DATA *****

LOC	FAC	E.P.	CAS #	SOURCE	HA, or h(AREA) hs TYPE FEET FEET IN.	D IN.	T F	V FPS	Q ACFM	EMISSIONS #/HOUR	EMISSIONS #/YEAR	D(AREA) FT	S(AREA) FT	BL FT
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00075-25-2	POINT	39. 65. 22.		70.	20.00	3167.77	0.00066	6.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00067-66-3	POINT	39. 65. 22.		70.	20.00	3167.77	0.00305	27.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00075-34-3	POINT	39. 65. 22.		70.	20.00	3167.77	0.00081	7.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00075-35-4	POINT	39. 65. 22.		70.	20.00	3167.77	0.00559	49.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00156-59-2	POINT	39. 65. 22.		70.	20.00	3167.77	0.00046	4.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00075-09-2	POINT	39. 65. 22.		70.	20.00	3167.77	0.00036	3.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00127-18-4	POINT	39. 65. 22.		70.	20.00	3167.77	0.00152	13.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00071-55-6	POINT	39. 65. 22.		70.	20.00	3167.77	0.02591	227.	1.	100.	100.
Facility Name & Address: City of Fulton GWTF														
SIC Code:	0		Application:	UTME:	387000.		UTMN:	4705000.	BL FACING DIRECTION:	180.0	%CONTROL:	0.0000		
			00079-01-6	POINT	39. 65. 22.		70.	20.00	3167.77	0.00025	2.	1.	100.	100.

CONTAMINANT TOXICITY PROFILE FOR AIR GUIDE 1 ANALYSIS

CONTAMINANT NAME	CAS NUMBER	SGC ug/m3	HOW SGC ASSIGNED	AGC ug/m3	HOW AGC ASSIGNED	DAR TOXICITY	COMMENTS
CHLOROFORM	00067-66-3	150.00000	NYSDEC	0.043000000	EPA	MODERATE	H,I,U
METHYL CHLOROFORM	00071-55-6	68000.00000	NYSDEC	1000.000000000	NYSDEC	LOW	H,I
DICHLOROMETHANE	00075-09-2	14000.00000	NYSDEC	2.100000000	EPA	MODERATE	H,I,U
BROMOFORM	00075-25-2	0.00000	NO SGC EXISTS	0.900000000	EPA	MODERATE	H,I
DICHLOROETHANE, 1,1	00075-34-3	0.00000	NO SGC EXISTS	20.000000000	NYSDEC	LOW	H,I
VINYLDENE CHLORIDE	00075-35-4	0.00000	NO SGC EXISTS	0.020000000	EPA	HIGH	H,U
TRICHLOROETHYLENE	00079-01-6	54000.00000	TRICHLOROETHYLENE	0.450000000	NYSDEC	MODERATE	H,I,U
TETRACHLOROETHYLENE	00127-18-4	1000.00000	NYSDEC	1.000000000	NYSDEC	MODERATE	H,I,U
cis-DICHLOROETHYLENE	00156-59-2	0.00000	NO SGC EXISTS	1900.000000000	NYSDEC "ANALOGY"	MODERATE	

COMMENTS :

(H) HAP identified by 1990 CAA.

(I) Refer to ACGIH Handbook.

(U) AGC equivalent to "one in a million risk".

EMISSION POINT AND CONTAMINANT IMPACT SUMMARY OF AIR GUIDE 1 ANALYSIS

LOC	FAC	E.P.	CAS NUMBER			SHORT-TERM	CAVITY	POINT or AREA SOURCE	
				EMISSIONS	EMISSIONS	IMPACT	IMPACT	IMPACT	
				#/HOUR	#/YEAR	ANNUAL	MAXIMUM	ACTUAL	POTENTIAL
						EMISSIONS	(Cav, Pt, Area)	ANNUAL	ANNUAL
						#/HOUR	ug/m3	ug/m3	ug/m3
*****	****	*****	*****	*****	*****	*****	*****	*****	*****
			00075-25-2	0.000661	5.7865	0.000661	0.040103	0.000000	0.001085
			00067-66-3	0.003049	26.7071	0.003049	0.184982	0.000000	0.005007
			00075-34-3	0.000813	7.1219	0.000813	0.049325	0.000000	0.001335
			00075-35-4	0.005589	48.9630	0.005589	0.339084	0.000000	0.009178
			00156-59-2	0.000456	4.0061	0.000457	0.027647	0.000000	0.000748
			00075-09-2	0.000355	3.1158	0.000356	0.021598	0.000000	0.000585
			00127-18-4	0.001524	13.3535	0.001524	0.092461	0.000000	0.002503
			00071-55-6	0.025914	227.0102	0.025914	1.572198	0.000000	0.042556
			00079-01-6	0.000254	2.2256	0.000254	0.015410	0.000000	0.000417

SUMMARY TOTALS				0.038616	338.2897	0.038616	2.342808	0.000000	0.063415
									0.063490

EMISSION POINT AND CONTAMINANT ASSESSMENT OF AIR GUIDE 1 ANALYSIS

LOC	FAC	E.P.	CAS NUMBER			SHORT-TERM	CAVITY	POINT or AREA SOURCE	
				AGC	SGC	IMPACT	IMPACT	IMPACT	
				ug/m3	ug/m3	MAXIMUM	ACTUAL	POTENTIAL	ACTUAL
						(Cav, Pt, Area)	ANNUAL	ANNUAL	ANNUAL
						% OF SGC	% OF AGC	% OF AGC	% OF AGC
*****	****	*****	*****	*****	*****	*****	*****	*****	*****
			00075-25-2	0.900000000	0.0000	0.0000	0.0000	0.1206	0.1207
			00067-66-3	0.043000000	150.0000	0.1233	0.0000	11.6443	11.6567
			00075-34-3	20.000000000	0.0000	0.0000	0.0000	0.0057	0.0067
			00075-35-4	0.020000000	0.0000	0.0000	0.0000	45.8912	45.9468
			00156-59-2	1900.000000000	0.0000	0.0000	0.0000	0.0000	0.0000
			00075-09-2	2.100000000	14000.0000	0.0002	0.0000	0.0278	0.0278
			00127-18-4	1.000000000	1600.0000	0.0092	0.0000	0.2503	0.2506
			00071-55-6	1000.000000000	58000.0000	0.0023	0.0000	0.0043	0.0043
			00079-01-6	0.450000000	54000.0000	0.0000	0.0000	0.0927	0.0928

SUMMARY TOTALS						0.1351	0.0000	58.0379	58.1064

CONTAMINANT IMPACT SUMMARY OF AIR GUIDE 1 ANALYSIS

CAS NUMBER	EMISSIONS #/HOUR	EMISSIONS #/YEAR	ANNUAL EMISSIONS #/HOUR	SUMMATION OF SHORT-TERM IMPACTS,	SUMMATION OF CAVITY IMPACTS	SUMMATION OF POINT or AREA SOURCE IMPACTS	
				MAXIMUM (Cav, Pt, Area) ug/m3	ACTUAL ANNUAL ug/m3	POTENTIAL ANNUAL ug/m3	ACTUAL ANNUAL ug/m3
*****	*****	*****	*****	*****	*****	*****	*****
00067-66-3	0.003049	26.7071	0.003049	0.184982	0.000000	0.005007	0.005012
00071-55-6	0.025914	227.0102	0.025914	1.572198	0.000000	0.042556	0.042605
00075-09-2	0.000356	3.1158	0.000356	0.021598	0.000000	0.000585	0.000585
00075-25-2	0.000661	5.7865	0.000661	0.040103	0.000000	0.001085	0.001096
00075-34-3	0.000813	7.1219	0.000813	0.049325	0.000000	0.001335	0.001337
00075-35-4	0.005589	48.9630	0.005589	0.339084	0.000000	0.009178	0.009189
00079-01-6	0.000254	2.2256	0.000254	0.015410	0.000000	0.000417	0.000418
00127-18-4	0.001524	13.3535	0.001524	0.092451	0.000000	0.002503	0.002506
00156-59-2	0.000456	4.0061	0.000457	0.027647	0.000000	0.000718	0.000752
*****	*****	*****	*****	*****	*****	*****	*****
SUMMARY TOTALS	0.038616	338.2897	0.038618	2.342808	0.000000	0.063415	0.063490

CONTAMINANT ASSESSMENT SUMMARY OF AIR GUIDE 1 ANALYSIS

CAS NUMBER	AGC ug/m3	SGC ug/m3	SUMMATION OF SHORT-TERM IMPACTS,	SUMMATION OF CAVITY IMPACTS	SUMMATION OF POINT or AREA SOURCE IMPACTS	
			MAXIMUM (Cav, Pt, Area) % OF SGC	ACTUAL ANNUAL % OF AGC	POTENTIAL ANNUAL % OF AGC	ACTUAL ANNUAL % OF AGC
*****	*****	*****	*****	*****	*****	*****
00067-66-3	0.043000000	150.0000	0.1233	0.0000	11.6443	11.6567
00071-55-6	1000.000000000	68000.0000	0.0023	0.0000	0.0043	0.0043
00075-09-2	2.100000000	14000.0000	0.0002	0.0000	0.0278	0.0278
00075-25-2	0.900000000	0.0000	0.0000	0.0000	0.1206	0.1207
00075-34-3	20.000000000	0.0000	0.0000	0.0000	0.0067	0.0067
00075-35-4	0.020000000	0.0000	0.0000	0.0000	45.8912	45.9468
00079-01-6	0.450000000	54000.0000	0.0000	0.0000	0.0927	0.0928
00127-18-4	1.000000000	1000.0000	0.0092	0.0000	0.2503	0.2506
00156-59-2	1900.000000000	0.0000	0.0000	0.0000	0.0000	0.0000
*****	*****	*****	*****	*****	*****	*****
SUMMARY TOTALS			0.1351	0.0000	58.0379	58.1064