



WISCONSIN DEPARTMENT OF NATURAL RESOURCES
NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

DOCUMENT ID

WY-19-0005-C

DOCUMENT TITLE

PAH Group of 10 Calculation of Concentration Using Toxicity Equivalent Factors

PROGRAM/BUREAU

Water Quality

STATUTORY AUTHORITY OR LEGAL CITATION

Wis. Stat. § 283.31 Water pollutant discharge elimination system; permits, terms and conditions. ss. NR 105.05 and 105.06, Wis. Adm. Code.

DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

09/09/2019

DATE FINALIZED

10/01/2019

DNR CERTIFICATION

I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.

10-1-2019

Signature

Date



BUREAU OF WATER QUALITY PROGRAM GUIDANCE

WASTEWATER POLICY AND MANAGEMENT TEAM

Wisconsin Department of Natural Resources
101 S. Webster Street, P.O. Box 7921
Madison, WI 53707-7921

PAH Group of 10 Calculation of Concentration Using Toxicity Equivalent Factors

Created September 2015

Revised May 2019

EGAD Number: 3400-2015-01

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APPROVED:

Adrian Stocks, Director
Bureau of Water Quality

5/28/19
Date

Introduction

This technical guidance establishes a method for staff in the water quality program to calculate the concentration of the polycyclic aromatic hydrocarbons (PAHs) group of 10 compounds for determining compliance in Wisconsin Pollutant Discharge Elimination System (WPDES) permits that regulate contaminants from petroleum products. Need for the guidance was triggered by a comment received during the 2014 reissuance of the Dane County Regional Airport WPDES permit (WI-0048747-04) on the PAH effluent limits for the oil and water separators. In response to a comment, the Department of Natural Resources (Department) implemented a new method for the summation of the PAH group of 10 compounds. The guidance is necessary to allow consistent application of the new method for determining compliance with the PAH limit, and to improve the accuracy in calculating the PAH group of 10 concentration. Any WPDES permit with PAH limits could be impacted.

Background Information

Point source wastewater discharges containing PAH compounds are usually regulated using best professional judgment (BPJ) effluent limitations based on s. NR 220.21, Wis. Adm. Code. The BPJ limits are based on an oil and water separator treatment process and activated carbon adsorption, where applicable, as the best available control technology economically achievable. When naphthalene is present an air stripping process is used to establish those BPJ limits. The BPJ limits meet site specific water quality standards for most Wisconsin waters.

There are three BPJ limits applicable to the PAH compounds.

- Benzo(a)pyrene is limited separately with a limit of 0.1 µg/L.
- Naphthalene is limited separately with a limit of 70 µg/L.
- A group of 10 PAH compounds are regulated together with a limit of 0.1 µg/L applicable to the sum of the detected amounts of each of the following:
 1. Benzo(a)anthracene
 2. Benzo(b)fluoranthene
 3. Benzo(k)fluoranthene
 4. Benzo(g,h,i)perylene
 5. Chrysene
 6. Dibenzo(a,h)anthracene
 7. Fluoranthene
 8. Indeno(1,2,3-cd)pyrene
 9. Phenanthrene
 10. Pyrene

Limits for PAH compounds are typically included in the groundwater remediation general permit (WI-0046566), the petroleum contaminated water general permit (WI-0046531), and other site specific individual WPDES permits when there is a need for a PAH limit, such as those with oil and water separators. For the PAH group of 10, permits generally allow compliance to be demonstrated by a no detect of all of the 10 compounds or by reporting the sum of the PAH group of 10 detected amounts equal to or less than 0.1 µg/L.

Water quality criterion for benzo(a)pyrene, and a group criterion for 10 of the 16 PAH compounds that have a similar atomic structure to benzo(a)pyrene, were removed from ch. NR 105, Wis. Adm. Code, in 1997 because they did not meet the minimum requirements for number of species with toxicological data. Since water quality criteria are not available, secondary values for PAHs may be calculated based on available toxicological data and a safety factor to protect aquatic life, according to ss. NR 105.05 and 105.06, Wis. Adm. Code.

PAH Toxicity Equivalent Factor

The method for calculating the PAH group of 10 concentration should reflect a toxicity equivalent factor (TEF) based on benzo(a)pyrene in order to normalize the toxicity. PAH compounds are a human health concern because they're suspected carcinogens. Benzo(a)pyrene is the most toxic of the PAH compounds based on available toxicological data. Most of the other PAH compounds are thought to be less toxic. To prevent an over estimation of the toxicity for the PAH group of 10 a toxicity equivalent factor (TEF), also

referred to as a relative potency factor (RPF), was established for each compound relative to benzo(a)pyrene. Use of a TEF in the summation of PAH group of 10 compounds is a more precise and scientifically valid methodology than a simple summation of the 10 compounds without taking into account the relative toxicity of each compound.

Permittees with PAH limits may have compliance issues with the PAH group of 10 because the summed concentration exceeds the 0.1 µg/L limit, even when all the individual compounds are <0.1 µg/L. This has occurred at sites where the oil and water separator is located near combustion sources, such as jet engines at airports. By using the TEF in calculating the concentration of the PAH group of 10, permittees that were in apparent violation may now be found in compliance due to the more precise method of calculating the concentration. This is not a new concept, as a similar TEF approach is used to evaluate compliance with limitations for dioxin related equivalent compounds, as described in s. NR 106.115, Wis. Adm. Code - “additivity of dioxins and furans”.

Summary of TEF Method

To calculate the concentration for the PAH group of 10, multiply the concentration of each PAH compound by the corresponding TEF value from the table below and then sum the results.

For reference to the TEF or RPF used in the table below several documents were reviewed (refer to reference section). Some of the PAH compounds have a few different TEF or RPF values reported. The values in the “PAH Toxicity Equivalent Factors” table include the EPA values (shown in bold), except when EPA did not have a value; in which case a literature value was chosen from the reference documents. The values are subject to change in the future if better information becomes available.

PAH Toxicity Equivalent Factors

	PAH Compounds	TEF - Toxicity Equivalent Factor	10 Summed Compounds with 0.1 µg/L Limit	Individual Compounds with Limits
1	Acenaphthene	--	--	--
2	Acenaphthylene	--	--	--
3	Anthracene	--	--	--
4	Benzo(a)anthracene	0.1	Benzo(a)anthracene	--
5	Benzo(a)pyrene	1	--	Benzo(a)pyrene 0.1 µg/L
6	Benzo(b)fluoranthene	0.1	Benzo(b)fluoranthene	--
7	Benzo(g,h,i)perylene	0.01	Benzo(g,h,i)perylene	--
8	Benzo(k)fluoranthene	0.01	Benzo(k)fluoranthene	--
9	Chrysene	0.001	Chrysene	--
10	Dibenzo(a,h)anthracene	1	Dibenzo(a,h)anthracene	--
11	Fluoranthene	0.001	Fluoranthene	--
12	Fluorene	--	--	--
13	Indeno(1,2,3-cd)pyrene	0.1	Indeno(1,2,3-cd)pyrene	--
14	Naphthalene	--	--	Naphthalene 70 µg/L
15	Phenanthrene	0.001	Phenanthrene	--
16	Pyrene	0.001	Pyrene	--

This guidance for calculating the concentration for the PAH group of 10 may be implemented in existing permits immediately. A permit modification to use the new calculation method is unnecessary. The PAH limit is not changing. The only change being made is how the summation of the 10 PAH compounds is calculated and may be reported by the permittee.

In future permits the following three paragraphs related to the regulation of PAHs may be included:

1.1.1.1 PAH Group of Ten

Polycyclic aromatic hydrocarbons (PAHs) shall include a summation of the following ten individual compounds: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene. Compliance with the monthly average PAH limit can be demonstrated by reporting a no detect of all of these PAH compounds, or by reporting the sum of the PAH individual compounds equal to or less than 0.1 µg/L. If a PAH compound is detected between the level of detection (LOD) and level of quantitation (LOQ) the value shall be reported on the DMR, but it is not considered an exceedance if the LOQ is greater than 0.1 µg/L.

In determining compliance with the 0.1 µg/L limit, the permittee may use the toxicity equivalent factors shown below. For calculating the concentration for the PAH group of 10, multiply the concentration of each PAH compound by the corresponding TEF value and then sum the results. For results <LOD, a zero may be used for the concentration. Refer to the permit standard requirement for the reporting of monitoring results.

	PAH Compounds	TEF - Toxicity Equivalent Factor
1	Benzo(a)anthracene	0.1
2	Benzo(b)fluoranthene	0.1
3	Benzo(g,h,i)perylene	0.01
4	Benzo(k)fluoranthene	0.01
5	Chrysene	0.001
6	Dibenzo(a,h)anthracene	1
7	Fluoranthene	0.001
8	Indeno(1,2,3-cd)pyrene	0.1
9	Phenanthrene	0.001
10	Pyrene	0.001

1.1.1.2 Benzo(a)pyrene

The PAH compound benzo(a)pyrene is regulated separately. Compliance can be demonstrated by reporting no detect, or by reporting a detected amount equal to or less than 0.1 µg/L.

1.1.1.3 Naphthalene

The PAH compound naphthalene is regulated separately. Compliance can be demonstrated by reporting no detect, or by reporting a detected amount equal to or less than 70 µg/L.

References

1. "Development of a Relative Potency Factor (RPF) Approach for Polycyclic Aromatic Hydrocarbon (PAH) Mixtures". Table 3.1 on page 45 lists the RPF for several of the PAH compounds.
http://cfpub.epa.gov/ncea/iris_drafts/recordisplay.cfm?deid=194584
2. At EPA's web site Ecotox toxicity equivalent factors can be found by searching for documents containing "PAH TEF".
<http://cfpub.epa.gov/ecotox/>
3. "Assessment of Benzo(a)pyrene-equivalent Carcinogenicity and Mutagenicity of Residential Indoor *versus* Outdoor Polycyclic Aromatic Hydrocarbons Exposing Young Children in New York City" article in the International Journal of Environmental Research and Public Health included TEF's for PAH compounds. While this study is on exposure to PAH's in the air, the same conclusions can be made for PAH's in water, sediment and fish.
<http://www.mdpi.com/1660-4601/7/5/1889>
4. The Minnesota Department of Health has "Guidance for Evaluating the Cancer Potency of Polycyclic Aromatic Hydrocarbon (PAH) Mixtures in Environmental Samples", dated October 31, 2014.
<http://www.health.state.mn.us/divs/eh/risk/guidance/pahguidance.pdf>

Prepared by:

Paul W. Luebke, P.H.
Wastewater Engineer
Bureau of Water Quality

Revisions by:

Trevor J. Moen
Wastewater Engineer
Bureau of Water Quality