

NPDES Permit Application to Discharge Wastewater Nebraska Pretreatment Program (NPP)

- a. All new and existing manufacturing or commercial facilities that discharge non-process and/or process wastewater to a Municipal Publicly Owned Treatment Works (POTW).
- b. All permittees with a currently effective permit shall submit a new application 180 days before the expiration date of the existing permit.
- c. Facilities proposing a new discharge must submit an application 180 days prior to the date proposed for commencing operation.
- d. In the case of a facility that has yet to commence discharge, provide all information available at the time the application is completed.
- e. If you do not have enough space on the form to answer a question, you may continue on additional sheets, as necessary, using a format consistent with this form.

NDEE Facility ID	NPP Permit Number NE
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SECTION 1: General Information 40 CFR 403.12(b)(1) to (3)

1.1 Facility Information

Facility Legal Name		
Mailing Address (Street or PO Box)		
City or Town	State	Zip Code
Contact Name (first and last)		Title
Phone number	Email address	
Location address (if different than mailing address)		County
Same as mailing address		
City or Town	State	Zip Code
Facility Latitude (decimal degrees)		Facility Longitude (decimal degrees)

1.2 Owner or Operator Information (Applicant/Permittee)

- a. The legal entity that controls the facility's operation and is subject to regulations, rather than the plant or site manager.

Owner or Operator Name		Owner: YES NO
Address (Street or PO Box)		
City or Town	State	Zip Code
Phone number	Email address	
Operator Status		
Public-federal	Public-state	Other public (specify) _____
Private	Other (specify) _____	

1.3 Existing Environmental Permits		
<p>a. Indicate below any existing environmental permit received or have applied for.</p> <p>b. Check all that apply. Include the corresponding permit number and approval date for each.</p>		
Industrial Storm Water	RCRA (hazardous waste)	PSD, NESHAPS, Nonattainment (CAA)
Construction Storm Water	UIC (underground injection control)	Other CAA (specify)
Other NPDES (specify)	Dredge or Fill (CWA 404)	Other (specify)
1.4 SIC and NAICS Codes		
<p>a. List, in descending order of significance, up to four 4-digit standard industrial classification (SIC) codes and North American Industrial Classification System (NAICS) codes that best describe your facility in terms of the principal products or services it produces or provides.</p>		
SIC Code	Description (optional)	
NAICS Code	Description (optional)	
1.5 Indian Country		
Is the facility located in Indian Country?		
Yes	No	
1.6 Topographic Map		
<p>Attach a topographic map to this application (or other map if topographic map is unavailable) extending at least one mile beyond property boundaries of the source, depicting the facility and each of its intake and discharge structures. See 40 CFR 122.21(f)(7) for complete requirements.</p>		
Completed and Attached		
1.7 Nature of Business		
Briefly describe the nature of the business.		
1.8 Discharge Date		
If the facility is a new discharger, provide the expected commencement of discharge date:		
NA		

SECTION 2: Information on Effluent Discharges

40 CFR 403.12(b)(4) to (5)

2.1 Description of Outfalls

- a. Provide the following information for all discharge outfalls from the facility including discharges to the sanitary sewer, POTW, and other locations such as storm sewers.
- b. Examples of discharge locations: sanitary sewer, combined sewer, POTW, storm sewer, evaporative lagoon, septic system, surface waters, or internal sample point.
- c. For latitude and longitude, enter the location data where the process wastewater leaves the facility and enters the discharge location.

Provide information below for each outfall.

Outfall #	Discharge location	Latitude (decimal degrees)	Longitude (decimal degrees)

2.2 Average Flows and Treatment

- a. For each outfall identified under item 2.1, provide the following information:
 - All processes, operations, or production areas that contribute wastewater to the effluent of the outfall, including process wastewater, cooling water, and storm water runoff. You may estimate the average flow of point sources composed of storm water; the basis for the rainfall event and the method of estimation must be indicated;
 - Average flow of wastewater contributed by each operation in million gallons per day (mgd);
 - Description of any treatment provided before discharge.

Outfall # _____

Operations Contributing to Flow

Process/Operation/Production Area	Average Flow
	mgd
	mgd
	mgd

Describe any treatment provided before discharge.

Is process wastewater combined with non-contact cooling water, sanitary wastewater, boiler blowdown, and/or any other non-process wastewater prior to the sampling location? If it does combine prior to discharge or sampling point, please detail the amounts of process and non-process wastewater for each outfall above.

Yes

No

2.3 Intermittent or Seasonal Flows

- a. Except for storm water runoff, leaks, or spills, if any of the discharges or expected discharges described in section 2.3 are seasonal or intermittent, complete the table.
- b. Discharges caused by routine maintenance shutdowns, process changes, or other similar activities are not considered to be intermittent.
- c. A discharge is seasonal if it occurs only during certain parts of the year.
- d. The frequency is the average recurrence rate of the discharge (in days per week and months per year). The duration is the average value of time during which the discharge occurs (in days).

NA

Outfall #	Operation	Frequency		Maximum Daily Flow Rate (mgd)	Duration (days)
		Average Days/Week	Average Months/Year		

2.4 Effluent Limitation Guidelines

- a. Indicate whether any effluent limitation guidelines (ELGs) promulgated under Section 304 of the Clean Water Act (CWA) apply to your facility.
- b. All ELGs promulgated by EPA appear in the Federal Register and are published annually in 40 CFR Subchapter N.
- c. An ELG applies if you have any operations contributing process wastewater in any subcategory covered by a Best Practicable Control Technology Currently Available (BPT), Best Conventional Pollutant Control Technology (BCT), or Best Available Technology Economically Achievable (BAT) guideline.

NA (continue to part 2.7)

Provide the following information on applicable ELGs.

ELG Category	ELG Subcategory	Regulatory Citation

2.5 Effluent Characteristics

- a. Read **Attachment B: General Instructions for Reporting, Sampling, and Analysis** before completing the table below.
- b. For all applicable ELGs identified above, provide results of sampling and analysis identifying mass and concentration of regulated pollutants.
- c. New dischargers must include estimates, along with the source of each estimate.

Parameter or Pollutant identified in ELG	Outfall #	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Source
		Mass	Conc.	Mass	Conc.	

2.6 Effluent Characteristics - Production

If ELGs are expressed in terms of production, provide an actual measure of daily production expressed in terms and units of applicable ELGs.

NA

Outfall #	Operation, Product, or Material	Quantity/Day	Unit of Measure

2.7 Effluent Characteristics – Priority Pollutants

- a. Read **Attachment B: General Instructions for Reporting, Sampling, and Analysis** before completing the table below.
- b. Identify on **Attachment C: Priority Pollutants** any of the chemicals which are stored, used in production of goods or services at your facility, or known to be discharged from your premises as either a liquid or solid waste.
- c. Fill out the table below for pollutants identified. Provide attachment if more space is needed.
- d. For new dischargers, you are not required to conduct actual sampling and analysis at this time. If, however, data from such analyses are available, you must report those data. Note that no later than 90 days after you begin discharging from the proposed facility, you must submit quantitative data for the pollutants and parameters identified on Attachment C, if applicable. However, you need not report results for tests you have already performed and reported under the discharge monitoring requirements of your NPP permit.

Pollutant Identified from Attachment C	Outfall	Maximum Daily Discharge (specify units)	Average Daily Discharge (specify units)	Source

2.8 Other Discharges

Describe any other discharges from the facility (e.g., sanitary wastewater, softener reject, RO reject, cooling tower blowdown, etc.), the approximate flows in MGD, and discharge locations (e.g., to the POTW downstream of process wastewater, direct discharge to storm sewer, etc.). Provide attachment if more space is needed.

Attachment Provided
NA

2.9 “Non-Discharge” Wastes	
Provide descriptions and quantities of wastes generated that are not discharged to the POTW. Also describe how these wastes are disposed of. Provide attachment if more space is needed.	
Attachment Provided NA	
2.10 Process Wastewater Treatment System Information	
Does the process wastewater undergo treatment before discharge to the POTW?	
Yes	No
Provide a description of the wastewater treatment process. Include a description of the physical, chemical, or biological treatment processes used to treat the wastewater.	
NA	
Attach a schematic diagram of the treatment process.	
Completed and Attached NA	
Is there any sludge (i.e. any solid, semisolid, or liquid waste) generated from the process wastewater treatment system? If yes, provide an attachment specifying sludge treatment and/or disposal practices.	
Yes	No
Completed and Attached NA	
Is any process wastewater land applied? If yes, provide an attachment with land application site information.	
Yes	No
Completed and Attached NA	
If cooling water additives are used, list below.	
NA	
Cooling Water Additives	Composition of Additives (if available)
2.11 Intake Characteristics	
List the sources of intake water (check all that apply):	
SOURCE	Gallons per day (gpd)
Municipal System	_____
Ground Water	_____
Other	_____
Total	_____

2.12 Prohibited Discharges

Are there any pollutants discharged by the applicant to the POTW in quantities or concentrations that will result in or significantly contribute to a violation of the prohibited discharges set forth below?

- | | | |
|-----|----|---|
| Yes | No | Inhibit, pass through, or interfere with the operation or performance of the POTW? |
| Yes | No | Create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 °F? |
| Yes | No | Cause corrosive structural damage to the POTW and in no case wastestreams with a PH lower than 5.0 S.U.? |
| Yes | No | Cause obstruction to the flow in the collection system or interfere with the operation of the POTW? |
| Yes | No | Cause interference or process upset at the treatment facility including slug loads? |
| Yes | No | Contain heat in amounts that can inhibit biological activity at the POTW, but in no case heat in such quantities that the temperature at the POTW exceeds 104 °F? |
| Yes | No | Result in the presence of toxic gases, vapors, or fumes within a POTW in a quantity that may cause acute worker health and safety problems? |
| Yes | No | Contain petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through? |

Provide explanation if you answered yes to any of the questions listed above.

2.13 Facility Flow Diagram

Attach a line drawing showing the water flow through the facility. The diagram must show all regulated and non-regulated process wastewater flows, and all points of discharge to sanitary sewer, storm sewers, surface waters, septic tanks, injection wells, or other discharge points including floor drains. Indicate sources of intake water, operations contributing wastewater to the effluent, and wastewater treatment units along with each discharge outfall. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfall numbers.

Completed and Attached

2.14 Other Information (optional)

Include any additional information the facility wishes to be considered, such as influent data.

SECTION 3: Checklist and Certification Statement

40 CFR 403.12(b)(6)

3.1 Checklist

- a. In Column 1 below, mark the sections of NPP Form that you have completed and are submitting.
- b. For each section, specify in Column 2 any attachments you are including.
- c. **Bolded items are required by all applicants.**

NPP Form Sections	Attachments
SECTION 1: General Facility Information	Topographic Map Additional Attachments
SECTION 2: Information on Effluent Discharges	Facility Flow Diagram Schematic of Treatment Process Sludge Treatment/Disposal Practices Land Application Site Documentation Additional Attachments
SECTION 3: Checklist and Certification Statement	Signatory Authorization Form (SAF) Additional Attachments

3.2 Certification

- a. Complete and submit with the application Attachment A: Signatory Authorization Form (SAF) for designating the Certifying Official.

Completed and Attached

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. If this permit is granted, I agree to abide by the Nebraska Environmental Protection Act (Neb. Rev. Stat. Secs. 81-1501 et seq. as amended to date), and the Rules and Regulations promulgated pursuant to these Acts.

Certifying Official, per Title 119, Chapter 13, see SAF	Title
Signature	Date

NPDES & NPP Signatory Authorization Form (NDEE, Title 119, Chapter 13)		
<p>a. Complete this form to identify or update contact information pertaining to the facility.</p> <p>b. Do not use home or personal addresses, unless necessary.</p> <p>c. Send to the Department with any application; or with any change or new authorization prior to, or together with, any reports, information, or applications.</p> <p>d. This form must be signed by the Certifying Official.</p>		
NDEE Facility ID	NPDES Permit Number NE	
Facility Information		
Facility Legal Name		
Mailing Address (Street or PO Box)		
City or Town	State	Zip Code
Applicant/Permittee		
<p>a. The name of company, business, governmental entity, or person that owns the facility and will be responsible for the permit compliance.</p>		
Applicant/Permittee		
Certifying Official (Responsible Official in NetDMR)		
<p>a. Person responsible for the permit, signing applications, signing DMRs or designating someone to sign DMRs (Duly Authorized Representative), and other correspondence.</p> <p>b. Those qualified for the designation of Certifying Official are:</p> <ul style="list-style-type: none"> • for a corporation, by a responsible corporate officer; • for a partnership or sole proprietorship, by a general partner or proprietor, respectively; • for a municipal, State, Federal, or other public agency, by a principal executive officer or ranking elected official. 		
Certifying Official Name (first and last)		Title
Phone number	Email address	
Address (if different than facility address)		Same as facility address
City or Town	State	Zip Code
Duly Authorized Representative (Signatory in NetDMR)		
<p>a. Person designated by the Certifying Official, and is responsible for receiving, completing, and signing DMRs, and receiving other correspondence.</p> <p>b. For additional Authorized Representative, use the space provided on page 2.</p> <p style="text-align: center;">Certifying Official will be signing DMRs (do not complete this section)</p>		
Authorized Representative Name (first and last)		Title
Phone number	Email address	
Address (if different than facility address)		Same as facility address
City or Town	State	Zip Code

Operator

- a. Person responsible for the operation and maintenance of the plant
- b. Facilities requiring certified operators shall meet the requirements of NDEE Title 197, and Title 123, chapter 11.
- c. If you represent this Facility as/for a Contractor, complete the contractor information.

Operator Name (first and last)		Classification	Certification #
Phone number	Email address		
Mailing Address (Street or PO Box)		Same as facility mailing address	
City or Town	State	Zip Code	
Contractor Name		Not Applicable	
Contractor Phone number	Contractor Email address		
Contractor Mailing Address (Street or PO Box)			
City or Town	State	Zip Code	
Additional Information			
Certification: I certify that I am familiar with the information in this report, and that to the best of my knowledge and belief such information is true, complete, and accurate.			
Certifying Official Signature			
Printed Name		Date	

Important note: Read these instructions before completing Sections 2.5-2.7 of the NPP application.

General Items

Complete the table in Sections 2.5-2.7 for each outfall at your facility. Be sure to note the NDEE facility ID Number, NPDES permit number, facility name, and applicable outfall number at the top of each associated attachments. You may report some or all the required data by attaching separate sheets of paper instead of completing Sections 2.5-2.7 for each of your outfalls so long as the sheets contain all of the required information and are similar in format to Sections 2.5-2.7.

Reporting of Effluent Data

Report pollutant levels for all pollutants in Sections 2.5-2.7 as concentration. Use the following abbreviations in the columns requiring "units" in Sections 2.5-2.7.

Concentration	Mass
ppm = parts per million	lbs = pounds
mg/L = milligrams per liter	ton = tons (English tons)
ppb = parts per billion	mg = milligrams
µg/L = micrograms per liter	g = grams
MPN = most probable number per 100 milliliters	kg = kilograms
	T = tonnes (metric tons)

You may report quantitative data that you have collected over the past 365 days if they are representative of your current operations. The data reported must include maximum daily discharge, and average daily discharge.

You must collect and analyze samples in accordance with 40 CFR 136. Grab samples must be used for analyses volatile organic compounds. Twenty-four-hour composite samples must be used for all other pollutants, using at least four grab samples unless otherwise specified at 40 CFR 136. For a composite sample, only one analysis of the composite of aliquots is required. If you have sampling and analysis questions, direct them to NDEE. The Department may request that you do additional testing, if appropriate, on a case-by-case basis under CWA Section 308.

New Dischargers: You must provide maximum daily and average daily discharge *estimates* for the parameters or pollutants listed in Attachment C for any of the chemicals which are stored, used in production of goods or services at your facility, or known to be discharged from your premises as either a liquid or solid waste. Note that if you have the results of *actual* analyses for the listed parameters or pollutants, you are required to report those results rather than submit estimates.

Note that you are required to conduct follow-up testing and reporting no later than 90 days after your facility commences discharge.

Base your determination of whether a pollutant will be present in your discharge on your knowledge of the proposed facility's use of maintenance chemicals and any analyses of your effluent or of any similar effluent. You may also provide the estimates based on available in-house or contractor engineering reports or any other studies performed on the proposed facility.

Pollutants Solely in Intake Water

If you expect a pollutant to be present solely because of its presence in your intake water, you must still provide an estimate or analytical results in Sections 2.5-2.7; however, you should indicate in Section 2.14 that you believe the pollutant or parameter to be present only due to its presence in your source water. Provide analytical results of the intake water as an attachment to the application. If your water is treated before use, test the water after it has been treated.

Testing Waivers

The Department may waive the testing and reporting requirements for flow or any of the pollutants listed in Sections 2.5- 2.7 if you submit a written request for such a waiver before or with your application. Contact NDEE for more information.

Sampling

The collection of samples for the reported analyses should be supervised by a person experienced in performing sampling of industrial wastewater. You may contact the Department for guidance on sampling techniques and for answers to specific questions. Any specific requirements in the applicable analytical methods—for example, sample containers, sample preservation, holding times, and the collection of duplicate samples—must be followed.

The time when you sample should be representative of your normal operation, to the extent feasible, with all processes that contribute wastewater in normal operation, and with your treatment system operating properly with no system upsets. Collect samples from the center of the flow channel, where turbulence is at a maximum, at a site specified in your present NPDES permit, or at any site adequate for the collection of a representative sample.

Analysis

Except as specified below, all required quantitative data shall be collected in accordance with sufficiently sensitive analytical methods approved under 40 CFR 136 or required under 40 CFR chapter I, subchapter N or O. A method is "sufficiently sensitive" when:

- The method minimum level (ML) is at or below the level of the applicable water quality criterion for the measured pollutant or pollutant parameter.
- The method ML is above the water quality criterion, but the amount of the pollutant or pollutant parameter in the facility's discharge is high enough that the method detects and quantifies the level of the pollutant or pollutant parameter in the discharge.
- The method has the lowest ML of the analytical methods approved under 40 CFR 136 or required under 40 CFR chapter I, subchapter N or O for the measured pollutant or pollutant parameter.

When there is no analytical method that has been approved under 40 CFR 136; required under 40 CFR chapter I, subchapter N or O, and is not otherwise required by the Department, you may use any suitable method but shall provide a description of the method. When selecting a suitable method, other factors such as a method's precision, accuracy, or resolution, may be considered when assessing the performance of the method.

Attachment C: Priority Pollutants

Pollutant/Parameter (CAS number, if available)	Check if Present
Volatile Compounds	
Acrolein (107-02-8)	
Acrylonitrile (107-13-1)	
Benzene (71-43-2)	
Bromoform (75-25-2)	
Carbon tetrachloride (56-23-5)	
Chlorobenzene (108-90-7)	
Chlorodibromomethane (124-48-1)	
Chloroethane (75-00-3)	
2-chloroethylvinyl ether (110-75-8)	
Chloroform (67-66-3)	
Dichlorobromomethane (75-27-4)	
1,1-dichloroethane (75-34-3)	
1,2-dichloroethane (107-06-2)	
1,1-dichloroethylene (75-35-4)	
1,2-dichloropropane (78-87-5)	
1,3-dichloropropylene (542-75-6)	
Ethylbenzene (100-41-4)	
Methyl bromide (74-83-9)	
Methyl chloride (74-87-3)	
Methylene chloride (75-09-2)	
1,1,2,2-Tetrachloroethane (79-34-5)	
Tetrachloroethylene (127-18-4)	
Toluene (108-88-3)	
1,2-trans-dichloroethylene (156-60-5)	
1,1,1-trichloroethane (71-55-6)	
1,1,2-trichloroethane (79-00-5)	
Trichloroethylene (79-01-6)	
Vinyl chloride (75-01-4)	
Acid Compounds	
2-chlorophenol (95-57-8)	
2,4-dichlorophenol (120-83-2)	
2,4-dimethylphenol (105-67-9)	
4,6-dinitro-o-cresol (534-52-1)	
2,4-dinitrophenol (51-28-5)	
2-nitrophenol (88-75-5)	
4-nitrophenol (100-02-7)	
p-chloro-m-cresol (59-50-7)	
Pentachlorophenol (87-86-5)	
Phenol (108-95-2)	
2,4,6-trichlorophenol (88-05-2)	

Pollutant/Parameter (CAS number, if available)	Check if Present
Base/Neutral Compounds	
Acenaphthene (83-32-9)	
Acenaphthylene (208-96-8)	
Anthracene (120-12-7)	
Benzidine (92-87-5)	
Benzo (a) anthracene (56-55-3)	
Benzo (a) pyrene (50-32-8)	
3,4-benzofluoranthene (205-99-2)	
Benzo (ghi) perylene (191-24-2)	
Benzo (k) fluoranthene (207-08-9)	
Bis (2-chloroethoxy) methane (111-91-1)	
Bis (2-chloroethyl) ether (111-44-4)	
Bis (2-chloroisopropyl) ether (102-80-1)	
Bis (2-ethylhexyl) phthalate (117-81-7)	
4-bromophenyl phenyl ether (101-55-3)	
Butyl benzyl phthalate (85-68-7)	
2-chloronaphthalene (91-58-7)	
4-chlorophenyl phenyl ether (7005-72-3)	
Chrysene (218-01-9)	
Dibenzo (a,h) anthracene (53-70-3)	
1,2-dichlorobenzene (95-50-1)	
1,3-dichlorobenzene (541-73-1)	
1,4-dichlorobenzene (106-46-7)	
3,3-dichlorobenzidine (91-94-1)	
Diethyl phthalate (84-66-2)	
Dimethyl phthalate (131-11-3)	
Di-n-butyl phthalate (84-74-2)	
2,4-dinitrotoluene (121-14-2)	
2,6-dinitrotoluene (606-20-2)	
Di-n-octyl phthalate (117-84-0)	
1,2-Diphenylhydrazine (as azobenzene) (122-66-7)	
Fluoranthene (206-44-0)	
Fluorene (86-73-7)	
Hexachlorobenzene (118-74-1)	
Hexachlorobutadiene (87-68-3)	
Hexachlorocyclopentadiene (77-47-4)	
Hexachloroethane (67-72-1)	
Indeno (1,2,3-cd) pyrene (193-39-5)	
Isophorone (78-59-1)	
Naphthalene (91-20-3)	
Nitrobenzene (98-95-3)	

Pollutant	Check if Present
Base/Neutral Compounds (continued)	
N-nitrosodimethylamine (62-75-9)	
N-nitrosodi-n-propylamine (621-64-7)	
N-nitrosodiphenylamine (86-30-6)	
Phenanthrene (85-01-8)	
Pyrene (129-00-0)	
1,2,4-trichlorobenzene (120-82-1)	
Pesticides	
Aldrin (309-00-2)	
α -BHC (319-84-6)	
β -BHC (319-85-7)	
γ -BHC (58-89-9)	
δ -BHC (319-86-8)	
Chlordane (57-74-9)	
4,4'-DDT (50-29-3)	
4,4'-DDE (72-55-9)	
4,4'-DDD (72-54-8)	
Dieldrin (60-57-1)	
α -endosulfan (115-29-7)	
β -endosulfan (115-29-7)	
Endosulfan sulfate (1031-07-8)	
Endrin (72-20-8)	
Endrin aldehyde (7421-93-4)	
Heptachlor (76-44-8)	
Heptachlor epoxide (1024-57-3)	

Pollutant	Check if Present
Pesticides (continued)	
PCB-1242 (53469-21-9)	
PCB-1254 (11097-69-1)	
PCB-1221 (11104-28-2)	
PCB-1232 (11141-16-5)	
PCB-1248 (12672-29-6)	
PCB-1260 (11096-82-5)	
PCB-1016 (12674-11-2)	
Toxaphene (8001-35-2)	
Metals, Cyanide, and Total Phenols	
Antimony, total (7440-36-0)	
Arsenic, total (7440-38-2)	
Beryllium, total (7440-41-7)	
Cadmium, total (7440-43-9)	
Chromium, total (7440-47-3)	
Copper, total (7440-50-8)	
Lead, total (7439-92-1)	
Mercury, total (7439-97-6)	
Nickel, total (7440-02-0)	
Selenium, total (7782-49-2)	
Silver, total (7440-22-4)	
Thallium, total (7440-28-0)	
Zinc, total (7440-66-6)	
Cyanide, total (57-12-5)	
Phenols, total	