

Hi Vince – Here is some suggested language to allow for the use of ceriodaphnia in the event that we cannot access a supply of mytilus:

Attachment E. (page E-5), Whole Effluent Toxicity Testing Requirements V.B.1.b.

Test Species. The test species shall be the mussel (*Mytilus galloprovincialis*) unless a more sensitive species is identified. *Ceriodaphnia dubia* may be used as an alternate species when *Mytilus galloprovincialis* is unavailable.

Attachment F. (Page F-24), Rationale for Effluent Limitations and Discharge Specifications VI.C.6.d.

Screening Phase Study. The MRP requires the Discharger to conduct a chronic toxicity screening phase study, as described in MRP Appendix E-1, prior to permit reissuance. The Discharger performed three rounds of chronic toxicity screening in 2013 and found toxicity in its effluent to the mussel (Mytilus galloprovincialis) to be the most sensitive species and the water flea (Ceriodaphnia dubia). Mytilus galloprovincialis was determined to be the most sensitive species, but there are certain times of the year when Mytilus galloprovincialis embryos and larvae are not available for testing. Under those circumstances, the Discharge may substitute Ceriodaphnia dubia as the test species.

I will send an email next week with the minor typos/corrections. Do you have a Word version of the TO that you can send me so that I can just do it in redline/strikeout format?

Thanks, Amanda