The sample type, grab vs. composite, is prescribed in the permit and determined by the permit writer after considering, at a minimum, the analytical method required in 40 C.F.R. §136, the type of pollutant, retention time, etc. Grab samples are required for the analysis of pH, temperature, cyanide, total phenols, residual chlorine, oil and grease, fecal coliform (including *E. coli*), or volatile organics.

4.3 Whole Effluent Toxicity (WET)

WET tests are not required for facilities with a permitted design flow less than 1.0 MGD and without an approved pre-treatment program; therefore, no WET test results were submitted with the application and the draft permit does not include any WET testing requirements.

4.4 Conventional Pollutants

Pollutants of Concern	Basis
pH	The instream wastewater concentration (IWC) is 63%. When the IWC is greater than 50%, there is reasonable potential for pH to cause or contribute to violations of the instream Georgia Water Quality Standard; therefore, pH limits of 6.0-8.5 SU (daily minimum-daily maximum) were included in the draft permit.
Five-Day Biochemical Oxygen Demand (BOD_5)	The monthly average BOD_5 limit was decreased from 30 mg/L to 15 mg/L. A compliance schedule to meet the new limit has been included in the draft permit. According to the steady-state dissolved oxygen Georgia DOSAG model, the proposed monthly average BOD_5 limit of 15 mg/L, when combined with the ammonia and dissolved oxygen limits (Refer to Section 4.5 below), is protective of the instream Water Quality Standard for dissolved oxygen described in Section 3.1 above.
Total Suspended Solids (TSS)	The monthly average TSS limit has been reduced from 90 mg/L to 30 mg/L. The proposed limit is in accordance with EPD's *Guidelines for Establishing Technology-Based Total Suspended Solids (TSS) Limits in Domestic Wastewater NPDES Permits*, 2020 for wastewater stabilization ponds. A compliance schedule to meet the new limit has been included in the draft permit.