Pollutants of Concern	Basis
Orthophosphate, Total Phosphorus (TP)	Total phosphorus measures all forms of phosphorus in a sample (orthophosphate, condensed phosphate, and organic phosphate). Orthophosphate, or reactive phosphorus is the amount of phosphorus available to chemically or biologically react in the environment. Discharges of total phosphorus directly to or within the watershed upstream from waterbodies with total phosphorus water quality standards must undergo an analysis to determine if the discharge of the pollutants has the reasonable potential to cause or contribute to instream water quality standard violations. Based on the pollutant being present in the wastestream, EPD has identified total phosphorus as a pollutant of concern for the following: POTWs, Private and Institutional Developments, CSO Control Facilities, and applicable Non POTWs. An effluent limit for total phosphorus and monitoring for orthophosphate has been included in the permit to provide information for further analyses and development of appropriate numeric or narrative effluent limits. Additionally, the permittee will be required to develop and maintain a Comprehensive Nutrient Optimization Plan. A monthly average TP limit of 5.0 mg/L has been included in the draft permit. The proposed limit was developed to meet the nutrient threshold criteria in in Florida Regulations, Chapter 62:302.531: Numeric Interpretations of Narrative Nutrient Criteria and to protect downstream uses. A compliance schedule to meet the new limit has been included in the draft permit.
Total Nitrogen (TN), Total Kjeldahl Nitrogen (TKN), Organic Nitrogen, Nitrate-Nitrite	Based on the pollutant being present in the wastestream, EPD has identified total nitrogen as a pollutant of concern for the following: POTWs, Private and Institutional Developments, CSO Control Facilities, and applicable Non POTWs. Monitoring for TKN, organic nitrogen, and nitrate-nitrite has been included in the permit to calculate total nitrogen, quantify nutrient loadings in the Suwannee River Basin, and provide information for further analyze and develop appropriate numeric or narrative effluent limits. Additionally, the permittee will be required to develop and maintain a Comprehensive Nutrient Optimization Plan. Total nitrogen is the sum of all nitrogen forms or TN = TKN + nitrite + nitrate. Organic nitrogen, as N = TKN – ammonia, as N. Total nitrogen, organic nitrogen, nitrate-nitrite, and TKN must be analyzed or calculated from the same sample to correctly calculate