

total nitrogen. See Section 5.7 and 5.8 of this Fact Sheet for additional information

A monthly average and annual average (12-month rolling average) TN limits of 25 mg/L and 20 mg/L, respectively, have been established using a watershed modeling system (LSPC++). The proposed limits were developed to meet the nutrient threshold criteria in Florida Regulations, Chapter 62:302.531: Numeric Interpretations of Narrative Nutrient Criteria and to protect downstream uses.

In order to demonstrate compliance with the annual average limit on a monthly basis rather than once at the end of a 12-month period, the permittee will calculate and report the 12-month rolling average on each Discharge Monitoring Report.

A 36-month compliance schedule to meet the new limit has been included in the draft permit.

The monthly average TN limitation of 25 mg/L will become effective after the completion of the compliance schedule. Twelve months of data is needed to calculate an annual average; therefore, the annual average TN limit of 20 mg/L will be applicable only 12 months after the completion of the compliance schedule.

Ammonia (NH₃)

A monthly average NH₃ limit of 5.2 mg/L has been included in the draft permit. According to the steady-state dissolved oxygen Georgia DOSAG model, the proposed limit, when combined with the monthly average BOD₅ limit (Refer to Section 4.4 above), is protective of the instream Water Quality Standard for dissolved oxygen described in Section 3.1 above. A compliance schedule to meet the new limit has been included in the draft permit.

A monthly average ammonia limit of 5.2 mg/L is also in accordance with EPD's *NPDES Permitting Strategy for Addressing Ammonia Toxicity*, 2017.

4.6 Toxics & Manmade Organic Compounds

Expanded effluent testing data in EPA Form 3510-2A is not required for facilities with a permitted design flow less than 1.0 MGD and without an approved pre-treatment program; therefore, no test results were submitted with the application.