

Total Mercury:

The United States Environmental Protection Agency (US EPA) completed a TMDL for total mercury in the Withlacoochee River in 2002. The TMDL recommended a water quality target of 6.8 ng/L in the Withlacoochee River. The permittee submitted the results of Mercury samples with the application. Based on a reasonable potential analysis, it has been determined that the facility's effluent has no reasonable potential to cause or contribute to an exceedance of the water Quality Standards for Mercury at the outfall or of TMDL water quality target in the Withlacoochee River; therefore, a mercury limit or monitoring for this pollutant has not been included in the permit.

3.5 Wasteload Allocation (WLA)

WLA for reissuance was issued on March 8, 2023. Refer to *Appendix A* of the Fact Sheet for a copy of the WLA.

4. PERMIT CONDITIONS AND EFFLUENT LIMITATIONS**4.1 Water Quality Based Effluent Limitations (WQBELs) & Technology Based Effluent Limits (TBELs)**

When drafting a National Pollutant Discharge Elimination System (NPDES) permit, a permit writer must consider the impact of the proposed pollutants in a discharge on the quality of the receiving water. Water quality goals for a waterbody are defined by state water quality criteria or standards. By analyzing the effect of a pollutant in the discharge on the receiving water, a permit writer could find that technology-based effluent limitations (TBELs) alone will not achieve the applicable water quality standards or protect downstream users. In such cases, the Clean Water Act (CWA) and its implementing regulations require development of water quality-based effluent limitations (WQBELs). WQBELs help meet the CWA objective of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters and the goal of water quality that provides for the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water (fishable/swimmable).

WQBELs are designed to protect water quality by ensuring water quality standards are met in the receiving water and the designated use and downstream uses are protected. On the basis of the requirements of 40 C.F.R. §125.3(a), additional or more stringent effluent limitations and conditions, such as WQBELs, are imposed when TBELs are not sufficient to protect water quality.

TBELs aim to prevent pollution by requiring a minimum level of effluent quality that is attainable using demonstrated technologies for reducing discharges of pollutants or pollution into the waters of the State. TBELs are developed independently of the potential impact of a discharge on the receiving water, which is addressed through water quality standards and WQBELs. The NPDES regulations at 40 C.F.R. §125.3(a) require NPDES permit writers to develop technology-based treatment requirements, consistent with CWA section 301(b), that represent the minimum level of control that must be imposed in a permit. The regulation also requires permit writers to include in permits additional or more stringent effluent limitations and conditions, including those necessary to protect water quality.