

5. OTHER PERMIT REQUIREMENTS AND CONSIDERATIONS

5.1 Mass Loading Limits

All mass loading limits expressed in kg/day in the current permit have been converted to lbs/day in the draft permit.

5.2 Long-Term BOD (LTBOD) Test

For facilities with a capacity of 1.0 MGD or greater, EPD may include requirements for LTBOD tests in permits for when data is needed for water quality modeling. The permittee conducted a LTBOD test during the current permit cycle; therefore, requirements for LTBOD testing have not been included in the draft permit.

5.3 Industrial Pretreatment Program (IPP)

The City has an approved IPP; therefore language has been included in the draft permit to reflect the approved program.

5.4 Sludge Management Plan (SMP)

The City has an approved SMP to land apply sludge at agronomic rates; therefore, language to reflect the approved plan has been included in the draft permit.

According to the approved Sludge Management Plan, sewage sludge is authorized to be applied on the following properties:

- City of Tifton Biosolids Farm, 185 Old Brookfield Rd., Tifton, GA 31794

5.5 Watershed Protection Plan (WPP)

The City has an approved WPP; therefore, language has been included in the draft permit to reflect the approved plan.

5.6 Service Delivery Strategy

The City is in compliance with the Department of Community Affairs approved Service Delivery Strategy for Tift County.

5.7 Compliance Schedules

A 36-month compliance schedule to meet the new limitation for total phosphorus and total nitrogen has been included in the draft permit. Based on best professional judgment, the proposed compliance schedule represents the shortest reasonable period of time to allow the permittee to upgrade the treatment process and test new equipment before the limit becomes effective. Language has also been included in the permit for the new limitation to become effective prior to the end of the schedule if the permittee can consistently meet the new limitation. All other effluent limitations are applicable immediately upon the effective date of the permit.