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**4.5 Nonconventional Pollutants (continued)**


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Pollutants of Concern	Basis
Total Phosphorus (TP), Orthophosphate	<p>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.</p> <p>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.</p> <p>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.</p> <p>Orthophosphate monitoring has been included in the draft permit in accordance with EPD's <i>Strategy for Addressing Phosphorus in NPDES Permitting</i>, 2011. See Section 5.8 and 5.9 of this Fact Sheet for additional information.</p> <p>A new monthly average TP limit of 3.6 mg/L has been included in the draft permit. The proposed limit has been established using a watershed modeling system (LSPC++) and was 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.</p> <p>A compliance schedule to meet the more stringent limit has been included in the draft permit.</p>

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