4.5 Nonconventional Pollutants (continued)

Pollutants of Concern	Basis
	Discharges of total nitrogen directly to or within the watershed upstream from waterbodies with total nitrogen water quality standards must undergo an analysis to determine if the discharge 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 nitrogen as a pollutant of concern for the following: POTWs, Private and Institutional Developments, CSO Control Facilities, and applicable Non POTWs. Monitoring for (ammonia if needed), 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.
Total Nitrogen (TN), Total Kjeldahl Nitrogen (TKN), Organic Nitrogen, Nitrate-Nitrite	Total nitrogen is the sum of all nitrogen forms or TN = TKN + nitrite + nitrate. Organic nitrogen, as N = TKN – ammonia, as N. Ammonia, organic nitrogen, nitrate-nitrite, and TKN must be analyzed or calculated from the same sample to correctly calculate total nitrogen. See Section 5.8 and 5.9 of this Fact Sheet for additional information. A new monthly average TN limit of 20 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. A compliance schedule to meet the more stringent limit has been included in the draft permit.