

**6. OTHER PERMIT REQUIREMENTS AND CONSIDERATIONS****6.1 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.

**6.2 Industrial Pretreatment Program (IPP)**

The City does not have an approved IPP; therefore, language for establishing an IPP, if necessary, has been included in the draft permit.

**6.3 Sludge Management Plan (SMP)**

The facility has not been required to dispose of sludge in the last five years. When necessary to dredge the pond, the City will choose a suitable landfill for disposal; therefore, a SMP is not required at this time.

**6.4 Watershed Protection Plan (WPP)**

The City does not have an approved WPP. A WPP is only required for new or expanding facilities, as well as for facilities with design permitted flow greater or equal to 1.0 MGD.

**6.5 Service Delivery Strategy**

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

**6.6 Compliance Schedules**

A 54-month compliance schedule to meet the reduced limitation for Ammonia and the new limitations 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 and reduced limitations to become effective prior to the end of the schedule if the permittee can consistently meet the new and reduced limitations. All other effluent limitations are applicable immediately upon the effective date of the permit.