

# Permit Fact Sheet

## General Information

Permit Number:	WI-0021903-10-1 Modification	
Permittee Name:	CITY OF BRODHEAD	
Address:	P O Box 168 1111 West 2nd Avenue	
City/State/Zip:	Brodhead WI 53520	
Discharge Location:	100 feet north of entrance to WWTF, approximately ½ mile from the Sugar River (SE ¼ of NE ¼ of Section 26, T2N, R9E Lat: 42.61921° N / Lon: 89.38693° W)	
Receiving Water:	Sugar River – Millrace (Lower Sugar River Watershed, SP11 – Sugar-Pecatonica River Basin) in Green County	
StreamFlow (Q <sub>7,10</sub> ):	25 cfs	
Stream Classification:	Warm Water Sport Fish (WWSF)	
Discharge Type:	Existing, Continuous	
Design Flow(s)	Daily Maximum	0.743 MGD
	Annual Average	0.597 MGD
Significant Industrial Loading?	None	
Operator at Proper Grade?	Yes – Basic Advanced with required subclasses A1 – Suspended Growth Processes, B – Solids Separation, C – Biological Solids/Sludges, P – Total Phosphorus, D – Disinfection, L – Laboratory, SS – Sanitary Sewage Collection System.	
Approved Pretreatment Program?	N/A	

## Facility Description

The City of Brodhead Wastewater Treatment Facility serves a population of approximately 3,500 people with no significant industries or anticipated growth. The city operates a treatment facility upgraded in 1998 consisting of preliminary treatment (grit and screenings removal), a septage receiving station, biological phosphorus removal, activated sludge (oxidation ditch extended aeration), final clarification and seasonal ultraviolet disinfection. The plant currently treats 320,000 gallons of wastewater per day on an annual average (design flow is 0.597 MGD) and achieves a high level of treatment. Sludge from the treatment process is aerobically digested and stored prior to being land spread seasonally on approved sites. Treated effluent is discharged to the Sugar River.

Permit Modification -1 was completed to change the sampling requirements for ammonia for May through September. During these months there are no ammonia limits effective in the permit therefore sampling for ammonia from May through September is only required in 2025. These data are for permit reissuance purposed.

## Substantial Compliance Determination

**Enforcement During Last Permit:** A notice of noncompliance was issued January 18, 2024 for an incomplete permit application on April 3, 2023.

After a desk top review of all discharge monitoring reports, CMARs, land application reports, compliance schedule items, and a site visit on 3/22/2023, this facility has been found to be in substantial compliance with their current permit.

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, WasteType/sample Contents and Treatment Description (as applicable)
701	0.28 MGD (2022 - 2023)	Influent: 24-Hr flow proportional sampler located at the headworks in the UV disinfection room, structure 20 after grit chamber and screening. Flow meter located in the influent channel after grit chamber.
001	0.25 MGD (2022 - 2023)	Effluent: 24-Hr flow proportional sampler located in the UV Building Room #20 prior to the UV channel and discharge to the Sugar River (millrace). Flow meter located in the main discharge pipe in basement of Building #20, prior to UV channel.
002	75 US dry Ton (per application)	Aerobically digested, Liquid, Class B. Representative sludge samples shall be collected from the sludge storage tank.

## 1 Influent – Monitoring Requirements

### Sample Point Number: 701- INFLUENT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Continuous	
BOD <sub>5</sub> , Total		mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	3/Week	24-Hr Flow Prop Comp	

### Changes from Previous Permit:

No changes required.

### Explanation of Limits and Monitoring Requirements

**BOD<sub>5</sub> and Total Suspended Solids** – Tracking of BOD<sub>5</sub> and Total Suspended Solids are required for percent removal requirements found in s. NR 210.05, Wis. Adm. Code.

## 2 Surface Water - Monitoring and Limitations

## Sample Point Number: 001- EFFLUENT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow Prop Comp	
BOD5, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	
Nitrogen, Ammonia (NH3-N) Total	Daily Max	20 mg/L	3/Week	24-Hr Flow Prop Comp	Monitoring year-round through 2025. Limits and monitoring effective October through April
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	20 mg/L	3/Week	24-Hr Flow Prop Comp	Monitoring year-round through 2025. Limits and monitoring effective October through April
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	18 mg/L	3/Week	24-Hr Flow Prop Comp	Monitoring year-round through 2025. Limits and monitoring effective October through March.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	10 mg/L	3/Week	24-Hr Flow Prop Comp	Monitoring year-round through 2025. Limits and monitoring effective April.
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	May through September
E. coli	% Exceedance	10 Percent	Monthly	Calculated	May through September. See the E. coli Percent Limit section. Enter the result in the DMR on the last day of the month.
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Chloride		mg/L	Monthly	24-Hr Flow Prop Comp	Monitoring only in 2028

**Monitoring Requirements and Limitations**

<b>Parameter</b>	<b>Limit Type</b>	<b>Limit and Units</b>	<b>Sample Frequency</b>	<b>Sample Type</b>	<b>Notes</b>
Phosphorus, Total	Monthly Avg	1.0 mg/L	3/Week	24-Hr Flow Prop Comp	Limit effective throughout the permit term, as it represents a minimum control level. See Water Quality Trading (WQT) sections for more information.
Phosphorus, Total		lbs/day	3/Week	Calculated	Report daily mass discharged using Equation 1a. in the Water Quality Trading (WQT) section.
WQT Credits Used (TP)		lbs/month	Monthly	Calculated	Report WQT TP Credits used per month using Equation 2c. in the Water Quality Trading (WQT) section. Available TP Credits are specified in Table 2 and in the approved Water Quality Trading Plan.
WQT Computed Compliance (TP)	6-Month Avg	0.1 mg/L	Monthly	Calculated	Value entered on the last day of the month. Value entered at the end of the six-month period (June 30 and December 31).
WQT Computed Compliance (TP)	Monthly Avg	0.3 mg/L	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 3a. in the Water Quality Trading (WQT) section. Value entered on the last day of the month.
WQT Computed Compliance (TP)	6-Month Avg	0.5 lbs/day	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 3b. in the Water Quality Trading (WQT) section. Value entered at the end of the six-month period (June 30 and December 31).
WQT Credits Used (TP)	Annual Total	389.0 lbs/year	Annual	Calculated	2024 Limit. The sum of total monthly credits used may not exceed Table 2

**Monitoring Requirements and Limitations**

<b>Parameter</b>	<b>Limit Type</b>	<b>Limit and Units</b>	<b>Sample Frequency</b>	<b>Sample Type</b>	<b>Notes</b>
					values listed.
WQT Credits Used (TP)	Annual Total	416.5 lbs/year	Annual	Calculated	2025 Limit. The sum of total monthly credits used may not exceed Table 2 values listed.
WQT Credits Used (TP)	Annual Total	415.3 lbs/year	Annual	Calculated	2026 Limit. The sum of total monthly credits used may not exceed Table 2 values listed.
WQT Credits Used (TP)	Annual Total	413.6 lbs/year	Annual	Calculated	2027 Limit. The sum of total monthly credits used may not exceed Table 2 values listed.
WQT Credits Used (TP)	Annual Total	414.7 lbs/year	Annual	Calculated	2028 Limit. The sum of total monthly credits used may not exceed Table 2 values listed.
WQT Credits Used (TP)	Annual Total	406.4 lbs/year	Annual	Calculated	2029 Limit. The sum of total monthly credits used may not exceed Table 2 values listed.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Series Monitoring section.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Series Monitoring section.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Annual in rotating quarters. See Nitrogen Series Monitoring section. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.
PFOS		ng/L	1 / 2 Months	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need schedule.
PFOA		ng/L	1 / 2 Months	Grab	Monitoring only. See PFOS/PFOA Minimization

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					Plan Determination of Need schedule.

## Changes from Previous Permit

Updates have been highlighted in table above.

- Fecal coliform monitoring and limits have been replaced with Escherichia coli (E. coli) monitoring and limits. E. coli monitoring is required at the permit effective date. E. coli limits of 126 #/100 ml as a monthly geometric mean may not be exceeded and 410 #/100 ml as a daily maximum may not be exceeded more than 10 percent of the time in any calendar month apply.
- Water Quality Trading section updated and TP concentration limit updated to reflect the minimum control value effective in conjunction with the water quality trading for phosphorus compliance.
- Nitrogen series monitoring added.
- PFOS and PFOA monitoring once every two months is included in the permit in accordance with s. NR 106.98(2)(c), Wis. Adm. Code.

Permit modification eliminated monitoring for ammonia May through September after calendar year 2025. Starting in 2026 sampling is only required in months ammonia limits are effective.

## Explanation of Limits and Monitoring Requirements

Refer to the WQBEL memo for the detailed calculations, prepared by Sarah Luck dated 11/24/2023 used for this reissuance.

**BOD5, TSS, Fecal Coliform and pH** - No changes are recommended in the categorical permit limitations for BOD5, TSS, or pH. Because the reference flow rates and receiving water characteristics have not changed, limitations for these water quality characteristics do not need to be re-evaluated at this time. However, on May 1, 2020 revisions to the bacteria surface water criteria became effective. Therefore, this permit has been updated to remove fecal coliform requirements and include E-coli monitoring and limits. Where the receiving water is classified as Warm Water Sport Fish in s. NR 102.04(3)(a), Wis. Adm. Code, the surface water criterion and categorical limits for BOD5, TSS, and pH are those limits enumerated in s. NR 102.04(4), in s. NR 102.04(4), Wis. Adm. Code.

**E. Coli**- Revisions to bacteria surface water quality criteria to protect recreational uses and accompanying E. coli WPDES permit implementation procedures became effective May 1, 2020. The new rule requires that WPDES permits for facilities with required disinfection include monitoring for E. coli while facilities are disinfecting during the recreation period, and establish effluent limitations for E. coli established in s. NR 210.06 (2), Wis. Adm Code. The administrative code rule changes included the following actions: revised the bacteria water quality criteria from fecal coliform to E. coli to protect recreation in ch. NR 102, Wis. Adm. Code; removed fecal coliform criteria for certain individual waters from ch. NR 104, Wis. Adm. Code; revised permit requirements for publicly and privately owned sewage treatment works in ch. NR 210, Wis. Adm. Code; and, updated approved analytical methods for bacteria in ch. NR 219, Wis. Adm. Code. E. coli monitoring is required at the permit effective date. E. coli limits of 126 #/100 ml as a monthly geometric mean that may not be exceeded and 410 #/100 are included in the permit effective upon reissuance.

**Ammonia**- Current acute and chronic ammonia toxicity criteria for the protection of aquatic life are included in Tables 2C and 4B of ch. NR 105, Wis. Adm. Code. Subchapter IV of ch. NR 106 establishes the procedure for calculating water

quality based effluent limitations (WQBELs) for ammonia. Monitoring year updated for the year of 2025 after which sampling is only required in months limits are effective.

**Total Phosphorus-** Phosphorus requirements are detailed in NR 102 Water Quality Standards and NR 217 Effluent Standards and Limitations for Phosphorus. Chapter NR 217 of the Wis. Adm. Code addresses point source dischargers of phosphorus to surface waters. Currently in NR 217 Wis. Adm. Code there are two methods used to determine if a phosphorus limit is needed: a technology based effluent limit (TBEL) and a water quality based effluent limit (WQBEL).

This permit authorizes the use of trading as a tool to demonstrate compliance with the final phosphorus WQBELs. This permit includes terms and conditions related to the Water Quality Trading Plan (WQT-2024-0013) or approved amendments thereof. The total ‘WQT TP Credits’ available are designated in the approved WQT Plan. The permittee is implementing the management practices of streambank stabilization. The WQT Plan proposes the generation of phosphorus credits for the next five years listed in the chart below.

**Total Phosphorus Credits Available per WQT-2024-0013**

<b>Year</b>	<b>Available Credits (lbs/yr) - Total</b>
2024	389.0
2025	416.5
2026	415.3
2027	413.6
2028	414.7
2029	406.4

The minimum control value of 0.5 mg/L was calculated using recent effluent data and was not based on the amount of approved trading credits; therefore, compliance with the minimum control value may not guarantee compliance with the approved annual water quality trading credits. Brodhead is responsible for ensuring any discharge over the phosphorus WQBELs complies with the approved amount of water quality trading credits generated. Additional WQT sections in the permit provide information on compliance determinations, annual reporting and re-opening of the permit.

**Total Nitrogen Monitoring (NO<sub>2</sub>+NO<sub>3</sub>, TKN and Total N)-** The Department has included effluent monitoring for Total Nitrogen in the permit through the authority under §§ 283.55(1)(e), Wis. Stats., which allows the department to require the permittee to submit information necessary to identify the type and quantity of any pollutants discharged from the point source, and through s. NR 200.065(1)(h), Wis. Adm. Code, which allows for this monitoring to be collected during the permit term. More information on the justification to include total nitrogen monitoring in wastewater permits can be found in the “Guidance for Total Nitrogen Monitoring in Wastewater Permits” dated October 1, 2019. Annual tests are scheduled in rotating quarters.

**PFOS and PFOA –** NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. At the first reissuance of a WPDES permit after August 1, 2022, the new rule requires WPDES permits for municipal dischargers with an average flow rate less than 1 MGD, to be evaluated on a case-by-case basis to determine if monitoring is required pursuant to s. NR 106.98(2)(c), Wis. Adm. Code. The department evaluated the need for PFOS and PFOA monitoring taking into consideration the presence of potential PFOS or PFOA industrial wastes, remediation sites and other potential sources of PFOS or PFOA. Based on information available at the time the proposed permit was drafted, it was identified that the POTW has an indirect discharger(s) that may be a potential source of PFOS/PFOA. The department identified a metal finisher that discharges to Brodhead.

Therefore, monitoring once every two months is included. A sample frequency of 1/2 months means one sample is taken during any two-month period. Examples of 1/2 month sample would be every other month (Jan, March, May, etc.) or back-to-back months with a break in between (February & March, May & June, Aug & Sept, etc.). DMR Short Forms will be generated for the following time periods: January-February, March-April, May-June, July-August, September-October, and November-December. At a minimum one sample result will be present on each form.

The initial determination of the need for sampling shall be conducted for up to two years in order to determine if the permitted discharge has the reasonable potential to cause or contribute to an exceedance of the PFOS or PFOA standards under s. NR 102.04(8)(d)1, Wis. Adm. Code.

**Monitoring Frequencies-** The [Monitoring Frequencies for Individual Wastewater Permits](#) guidance (April 12, 2021) recommends that standard monitoring frequencies be included in individual wastewater permits based on the size and type of the facility, in order to characterize effluent quality and variability, to detect events of noncompliance, and to ensure fairness and consistency in permits issued across the state. Guidance and requirements in administrative code were considered when determining the appropriate monitoring frequencies for pollutants that have final effluent limits in effect during this permit term. No changes to sampling frequency were warranted.

**Expression of Limits-** In accordance with the federal regulation 40 CFR 122.45(d) and s. NR 205.065, Wis. Adm. Code. limits in this permit are to be expressed as weekly average and monthly average limits whenever practicable.

### 3 Land Application - Monitoring and Limitations

Municipal Sludge Description						
Sample Point	Sludge Class (A or B)	Sludge Type (Liquid or Cake)	Pathogen Reduction Method	Vector Attraction Method	Reuse Option	Amount Reused/Disposed (Dry Tons/Year)
002	B	Liquid	Fecal Coliform	Injection	Land Application	75 – according to permit application
Does sludge management demonstrate compliance? <b>Yes</b>						
Is additional sludge storage required? <b>No</b>						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? <b>Yes</b>						
If yes, special monitoring and recycling conditions will be included in the permit to track any potential problems in landapplying sludge from this facility						
Is a priority pollutant scan required? <b>No</b>						
Priority pollutant scans are required once every 10 years at facilities with design flows between 5 MGD and 40 MGD, and once every 5 years if design flow is greater than 40 MGD.						



## Sample Point Number: 002- SLUDGE

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Solids, Total		Percent	Annual	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Annual	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Annual	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Annual	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Annual	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Annual	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Annual	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Annual	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Annual	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Annual	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Annual	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Annual	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Annual	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Annual	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Annual	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Annual	Composite	
Nitrogen, Total Kjeldahl		Percent	Annual	Composite	
Nitrogen, Ammonium (NH <sub>4</sub> -N) Total		Percent	Annual	Composite	
Phosphorus, Total		Percent	Annual	Composite	
Phosphorus, Water Extractable		% of Tot P	Annual	Composite	
Potassium, Total Recoverable		Percent	Annual	Composite	
Radium 226 Dry Wt		pCi/g	Annual	Composite	
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Once in 2025
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Once in 2025

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
PFOA + PFOS		ug/kg	Annual	Calculated	Report the sum of PFOS and PFAS. See PFAS Permit Sections for more information.
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

### Changes from Previous Permit:

PCB sampling year updated. Annual PFAS monitoring is included in the permit pursuant s. NR 204.06(2)(b)9, Wis. Adm. Code.

### Explanation of Limits and Monitoring Requirements

Enter Explanation (Requirements for land application of municipal sludge are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5), Wis. Adm. Code. Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7), Wis. Adm. Code for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k), Wis. Adm. Code. Radium requirements are addressed in s. NR 204.07(3)(n), Wis. Adm. Code.

**PFAS-** The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA is currently developing a risk assessment to determine future land application rates and expects to release this risk assessment by the end of 2024. In the interim, the department has developed the “Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS”.

Collecting sludge data on PFAS concentrations from a wide range of wastewater treatment facilities will help protect public health from exposure to elevated levels of PFAS and determine the department’s implementation of EPA’s recommendations. To quantitate this risk, PFAS sampling has been included in the proposed WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9, Wis. Adm. Code.

## 4 Schedules

### 4.1 Annual Water Quality Trading (WQT) Report

Required Action	Due Date
<b>Annual WQT Report:</b> Submit an annual WQT report that shall cover the first year of the permit term. The WQT shall include the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspections performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan.	01/31/2025
<b>Annual WQT Report #2:</b> Submit an annual WQT report that shall cover the previous year.	01/31/2026
<b>Annual WQT Report #3:</b> Submit an annual WQT report that shall cover the previous year.	01/31/2027

<b>Annual WQT Report #4:</b> Submit an annual WQT report that shall cover the previous year.	01/31/2028
<b>Annual WQT Report #5:</b> Submit the 5th annual WQT report. If the permittee wishes to continue to comply with phosphorus limits through WQT in subsequent permit terms, the permittee shall submit a revised WQT plan including a demonstration of credit need, compliance record of the existing WQT, and any additional practices needed to maintain compliance over time.	01/31/2029
<b>Annual WQT Report Required After Permit Expiration:</b> In the event that this permit is not reissued by the expiration date, the permittee shall continue to submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification on noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.	

## Explanation of Schedules

**Annual Water Quality Trading (WQT) Reports** - Reports are required that include the following information:

- Verification that site inspections occurred;
- Brief summary of site inspection findings;
- Identification of noncompliance or failure to implement any terms or conditions of the permit or trading plan that have not been reported in discharge monitoring reports;
- Any applicable notices of termination or management practice registration; and
- A summary of credits used each month over the calendar year.

## 4.2 Land Application Management Plan

A management plan is required for the land application system.

Required Action	Due Date
<b>Land Application Management Plan Submittal:</b> Submit a management plan to optimize the land application system performance and demonstrate compliance with ch. NR 204, Wis. Adm. Code, by the Due Date. This management plan shall 1) specify information on pretreatment processes (if any); 2) identify land application sites; 3) describe site limitations; 4) address vegetative cover management and removal; 5) specify availability of storage; 6) describe the type of transporting and spreading vehicle(s); 7) specify monitoring procedures; 8) track site loading; 9) address contingency plans for adverse weather and odor/nuisance abatement; and 10) include any other pertinent information. Once approved, all landspreading activities shall be conducted in accordance with the plan. Any changes to the plan must be approved by the Department prior to implementing the changes.	01/31/2025

## Explanation of Schedules

This schedule requires a Land Application Management Plan be submitted to ensure sludge management practices comply with ch. NR 204, Wis. Adm. Code, pursuant to s. NR 204.11, Wis. Adm. Code. The management plan shall also include all department issued approval maps and Land Application Approval Forms (3400-122) for all approved sites, to comply with s. NR 204, Wis. Adm. Code. Sites that no longer match approval conditions in the department issued approval maps and Land Application Approval Forms (3400-122) in the management plan must be reviewed and potentially reauthorized to comply with ch. NR 204, Wis. Adm. Code.

## 4.3 PFOS/PFOA Minimization Plan Determination of Need

Required Action	Due Date
<b>Report on Effluent Discharge:</b> Submit a report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations. This	07/31/2025

<p>analysis should also include a comparison to the applicable narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code.</p> <p>This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results.</p>	
<p><b>Report on Effluent Discharge and Evaluation of Need:</b> Submit a final report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations of data collected over the last 24 months. The report shall also provide a comparison on the likelihood of the facility needing to develop a PFOS/PFOA minimization plan.</p> <p>This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results.</p> <p>The permittee shall also submit a request to the department to evaluate the need for a PFOS/PFOA minimization plan.</p> <p>If the department determines a PFOS/PFOA minimization plan is needed based on a reasonable potential evaluation, the permittee will be required to develop a minimization plan for department approval no later than 90 days after written notification was sent from the department. The department will modify or revoke and reissue the permit to include PFOS/PFOA minimization plan reporting requirements along with a schedule of compliance to meet WQBELs. Effluent monitoring of PFOS and PFOA shall continue as specified in the permit until the modified permit is issued.</p> <p>If, however, the department determines there is no reasonable potential for the facility to discharge PFOS or PFOA above the narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code, no further action is required and effluent monitoring of PFOS and PFOA shall continue as specified in the permit.</p>	07/31/2026

## Explanation of Schedules

As stated above, NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. S. NR 106.98, Wis. Adm. Code, specifies steps to generate data in order to determine the need for reducing PFOS and PFOA in the discharge. Data generated per the effluent monitoring requirements will be used to determine the need for developing a PFOS/PFOA minimization plan. As part of the schedule, the permittee is required to submit two annual Reports on Effluent Discharge.

If the department determines that a minimization plan is needed, the permit will be modified or revoked/reissued to include additional requirements.

## Special Reporting Requirements

None

## Other Comments:

None

## Attachments:

Water Quality Based Effluent Limits dated November 24, 2023

Water Quality Trading Plan dated May 2024

Water Quality Trading Conditional Approval dated June 3, 2024

## **Expiration Date:**

06/30/2029

## **Justification Of Any Waivers From Permit Application Requirements**

No waivers were requested in the permit application.

**Prepared By:** Jennifer Jerich, Wastewater Specialist

**Date:** 4/4/2024

**Revision date post fact check:** 6/5/2024

**Revision date post public notice & hearing:** 7/25/2024

**Permit Modification:** 10/16/2024