Pittsville Water and Sewer Department Public Noticed Permit Fact Sheet

General Information

Permit Number	WI-0020494-11-0
Permittee Name and Address	Pittsville Water and Sewer Department, PO Box 100, Pittsville WI 54466
Permitted Facility Name and Address	Pittsville Water and Sewer Dept WWTF, 8375 Veedum St., Pittsville, WI 54466
Permit Term	February 01, 2025 to December 31, 2029
Discharge Location	North bank of the Yellow River, 0.15 miles from the 2nd Ave. and Poplar St. intersection SE1/4, NW1/4, Section 34, T23N R03E, City of Pittsville, Wood County, WI
Receiving Water	the Yellow River in the Upper Yellow River Watershed in the Upper Wisconsin River Basin in Wood County
Stream Flow ($Q_{7,10}$)	3.70 cfs
Stream Classification	Warm Water Sport Fish (WWSF) community, non-public water supply
Discharge Type	Existing, continuous
Annual Average Design Flow (MGD)	0.174 MGD
Industrial or Commercial Contributors	None
Plant Classification	A4 - Ponds, Lagoons and Natural Systems; P - Total Phosphorus; D - Disinfection; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

The Pittsville Wastewater Treatment Facility treats domestic wastewater from the City of Pittsville. The annual average design flow is 0.174 million gallons per day (MGD). From November 2023 through October 2024 the actual annual influent flow was 0.094 MGD and the actual annual average effluent flow was 0.092 MGD. Treatment consists of a fine screen, an aerated lagoon and a covered settling pond. Effluent is seasonally disinfected via ultraviolet light prior to discharge to the Yellow River. Phosphorus removal is aided by the addition of Rare Earth 2 between the aerated lagoon and the settling pond. Significant effluent monitoring and/or limit changes in this permit term are as follows: 1) the sample frequency for flow has been changed from “continuous” to “daily” for eDMR reporting purposes (this same change has been made at the influent), 2) the conditional reapproval of a multi-discharger variance (MDV) for phosphorus and the reduction in the interim MDV limit, along with a schedule to meet that lower limit, 3) reduction in the ammonia monthly & weekly avg ammonia limits Nov-July and a change in season when the monitoring & limits apply, 4) addition of chronic WET testing, 5) fecal coliform monitoring & limit has been replaced with Escherichia coli (E. coli), and 6) an

increase in pH monitoring frequency. Clarification language has been added notifying the permittee they must monitor sludge for List 2 nutrients and meet the requirements of List 3 (Pathogen Control) and List 4 (Vector Attraction Reduction) prior to landspreading if they remove sludge from the lagoon(s). A schedule has been included requiring the permittee submit a sludge management plan prior to removal and land application of sludge from the pond(s). Additionally, to quantitate the risk, PFAS sludge sampling has been included in the permit pursuant to ss. NR214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code. The PCB sludge monitoring requirement has been waived this permit term.

Substantial Compliance Determination

Enforcement During Last Permit: The Pittsville Wastewater Treatment Facility has a history of phosphorus limit violations resulting from pond turnover in the spring. Operational changes to Rare Earth 2 dosing were made in the spring of 2024 resulting in effluent phosphorus levels staying below limits. The facility will continue to operate under those conditions going forward. Several TSS and phosphorus violations in 2020 were the result of an industry that no longer discharges to the facility.

After a desktop review of all discharge monitoring reports, CMARs, land application reports and a site visit on 4/30/2024 the Pittsville Wastewater Treatment Facility has been found to be in substantial compliance with their current permit.

Compliance determination entered by Logan Rubeck on 5/28/2024.

Sample Point Descriptions

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**
702	**Influent**: 0.094 (Nov 2023 – Oct 2024)	Representative influent composite samples shall be collected after the fine screen.
006	**Effluent to Yellow Rive**r: (0.082 (June 2023 – May 2024)	Representative effluent composite samples shall be collected prior to UV disinfection and grab samples shall be collected after UV disinfection.
007	**Lagoon Sludge**, has never been removed & not anticipated this permit term	Representative composite sludge samples shall be collected in 2026 and monitored for the parameters as listed in the table below. If the permittee plans to remove sludge, they shall monitor sludge for Lists 1, 2, 3 & 4 prior to land application. The Department shall be notified at least 30 days in advance of sludge removal so that appropriate monitoring forms can be provided. Approval of landspreading sites must be completed prior to sludge removal.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 702- INFLUENT

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total		mg/L	2/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	2/Week	24-Hr Flow Prop Comp	

1.1.1 Changes from Previous Permit:

The sample frequency for flow has been changed from "continuous" to "daily" for eDMR reporting purposes.

1.1.2 Explanation of Limits and Monitoring Requirements

Monitoring of influent flow, BOD5 and total suspended solids is required by s. NR 210.04(2), Wis. Adm. Code, to assess wastewater strengths and volumes and to demonstrate the percent removal requirements in s. NR 210.05, Wis. Adm. Code, and in the Standard Requirements section of the permit.

2 Surface Water - Monitoring and Limitations

2.1 Sample Point Number: 006- DISCHARGE TO YELLOW RIVER

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Weekly Avg	34 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in July & Sept
BOD5, Total	Weekly Avg	49 lbs/day	2/Week	Calculated	Limit applies in July & Sept
BOD5, Total	Weekly Avg	24 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in Aug
BOD5, Total	Weekly Avg	35 lbs/day	2/Week	Calculated	Limit applies in Aug
BOD5, Total	Monthly Avg	24 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in Aug

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
BOD5, Total	Monthly Avg	30 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies Sept - July (all months except for Aug)
BOD5, Total	Weekly Avg	45 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies Oct - June
Suspended Solids, Total	Weekly Avg	34 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in July & Sept
Suspended Solids, Total	Weekly Avg	49 lbs/day	2/Week	Calculated	Limit applies in July & Sept
Suspended Solids, Total	Weekly Avg	24 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in Aug
Suspended Solids, Total	Weekly Avg	35 lbs/day	2/Week	Calculated	Limit applies in Aug
Suspended Solids, Total	Monthly Avg	24 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in Aug
Suspended Solids, Total	Monthly Avg	30 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies Sept - July (all months except for Aug)
Suspended Solids, Total	Weekly Avg	45 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies Oct - June
pH Field	Daily Max	9.0 su	5/Week	Grab	
pH Field	Daily Min	6.0 su	5/Week	Grab	
Nitrogen, Ammonia (NH3-N) Total	Daily Max	11 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies Nov-July
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	11 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies Nov-July
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	11 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies Nov-July
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	15 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in Aug
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	15 mg/L	2/Week	24-Hr Flow Prop Comp	Limit applies in Aug
E. coli	Geometric Mean - Monthly	126 #/100 ml	2/Week	Grab	Limit & monitoring apply May-Sept
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit & monitoring apply May-Sept. See the E. coli Percent Limit section in the permit. Enter the result in

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					the DMR on the last day of the month.
Phosphorus, Total	Monthly Avg	1.0 mg/L	2/Week	24-Hr Flow Prop Comp	This is an interim limit effective through 09/30/2029. See the MDV/Phosphorus subsections and phosphorus schedules in the permit.
Phosphorus, Total	Monthly Avg	0.6 mg/L	2/Week	24-Hr Flow Prop Comp	This is an interim MDV limit effective 10/01/2029. See the MDV/Phosphorus subsections and phosphorus schedules in the permit.
Phosphorus, Total		lbs/month	Monthly	Calculated	Report the total monthly phosphorus discharged in lbs/month on the last day of the month on the DMR. See Standard Requirements for 'Appropriate Formulas' to calculate the Total Monthly Discharge in lbs/month.
Phosphorus, Total		lbs/yr	Annual	Calculated	Report the sum of the total monthly discharges (for the months that the MDV is in effect) for the calendar year on the Annual report form.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in the permit.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in the permit.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in the permit. Total Nitrogen shall be calculated as the sum of reported

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET testing section in the permit.
Chronic WET		TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET testing section in the permit.

2.1.1 Changes from Previous Permit

Significant effluent monitoring and/or limit changes in this permit term are as follows: 1) the sample frequency for flow has been changed from "continuous" to "daily" for eDMR reporting purposes, 2) the conditional reapproval of a multi-discharger variance (MDV) for phosphorus and the reduction in the interim MDV limit, along with a schedule to meet that lower limit, 3) reduction in the ammonia monthly & weekly avg ammonia limits Nov-April and May-July and a change in season when the monitoring and limits apply, 4) addition of chronic WET testing twice in the permit term, 5) fecal coliform monitoring & limit have been replaced with Escherichia coli (E. coli), and 6) an increase in pH monitoring frequency to 5/week from 2/week.

2.1.2 Explanation of Limits and Monitoring Requirements

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 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. The only monitoring frequency change in this permit term is and increase in the pH monitoring frequency from 2/week to 5/week.

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 whenever practicable.

Limits were determined for Pittsville's existing discharge to the Yellow River using chs. NR 102, 104, 105, 106, 207, 210, 212 and 217 of the Wisconsin Administrative Code (where applicable). For additional information on any of the limits see the December 4, 2024 memo from Ben Hartenbower to Holly Heldstab titled "Water Quality-Based Effluent Limitations for the Pittsville Water and Sewer Department Wastewater Treatment Facility WPDES Permit No. WI-0020494".

BOD, TSS and pH: Categorical limits and WQBELs are included in the permit as outlined in ch. NR 210, Wis. Adm. Code. The effluent limitations for BOD5, Total Suspended Solids and pH are carried over from the previous permit and are not subject to change at this time because the receiving water characteristics have not changed. The pH monitoring frequency has been increased from 2/week to 5/week.

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. The permittee had limits in the last permit term, however due to an increase in effluent pH, the daily maximum limits decreased. The increase in effluent pH also triggered reasonable potential to exceed the more restrictive daily maximum ammonia limits for additional months of the year, therefore the months of the year have been expanded when the weekly and monthly average limits apply.

Disinfection/*E. Coli/*Fecal Coliform: Pittsville disinfects the effluent May-Sept using ultraviolet (UV) light prior to discharge to the Yellow River. Fecal coliform monitoring and limits have been replaced with *Escherichia coli (E. coli*) monitoring and limits. 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.

Phosphorus: Final phosphorus TMDL-based effluent limits of 0.486 lbs/day monthly average and 0.162 lbs/day 6-month average were included in the previous permit and set to become effective unless a variance was granted. The permittee was granted a multi-discharge variance for phosphorus during the previous permit term and has re-applied for the MDV as provided for in s. 283.16, Wis. Stats., and approved by USEPA on February 6, 2017 for a 10-year duration. The permittee qualifies for the MDV because it is an existing source and a major facility upgrade is needed to comply with the applicable phosphorus WQBELs, thereby creating a financial burden. Pittsville's MDV application was conditionally approved by the DNR on September 6, 2024. The interim monthly average highest attainable condition (HAC) limit of 1.0 mg/L applies at the permit effective date. A compliance schedule is included in the permit to bring the permittee into compliance with the next step down in an interim MDV limit of 0.6 mg/L, which becomes effective 10/01/2029 per the associated compliance schedule. The length of the compliance schedule will allow the permittee to address the I & I issues that contribute to effluent phosphorus levels.

Conditions of the MDV require the permittee to optimize phosphorus removal throughout the permit term, comply with interim limits and make annual payments to participating county(s) by March 1 of each year based on the pounds of phosphorus discharged during the previous year in excess of the specified target value. A reopener clause is included in the permit to address the current MDV's expiration date, as a permit action may be required to update or remove variance provisions if the MDV is altered or unavailable after February 6, 2027.

The "price per pound" value is $50.00 adjusted for CPI annually during the first quarter as defined by s. 283.16(8)(a)2, Wis. Stats and takes effect for reissued permits with effective dates starting April 1. This may differ from the "price per pound" that is public noticed; however, the "price per pound" is set upon reissuance and is applicable for the entire permit term. The participating county(s) uses these payments to implement non-point source phosphorus control strategies at the watershed level.

The Wisconsin River Basin TMDL Waste Load Allocation (WLA) for total phosphorus was approved by the U.S. Environmental Protection Agency on April 26, 2019 and the site-specific criteria (SSC) in Appendix K were adopted by rule in s. NR 102.06(7), Wis. Adm. Code on June 1, 2020 and approved by the U.S. Environmental Protection Agency on July 9, 2020. The approved TMDL SSC WLA limit for phosphorus is 49 lbs/yr, which equates to 0.134 lbs/day (monthly average). For this permit term, the permittee has applied for the MDV for phosphorus and was approved for the MDV on September 6, 2024.

Total Nitrogen Monitoring (NO2+NO3, 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 the following rotating quarters:

- 2nd quarter (April – June) 2025
- 4th quarter (Oct – Dec) 2026
- 3rd quarter (July – Sept) 2027

- 2nd quarter (April – June) 2028
- 1st quarter (Jan – March) 2029

Whole Effluent Toxicity- Whole effluent toxicity (WET) testing requirements and limits (if applicable) are determined in accordance with ss. NR 106.08 and NR 106.09 Wis. Adm. Code, as revised August 2016. (See the current version of the Whole Effluent Toxicity Program Guidance Document and checklist and WET information, guidance and test methods at http://dnr.wi.gov/topic/wastewater/wet.html). Acute and chronic WET tests are required in the following quarters:

- 3rd quarter (July – Sept) 2026
- 1st quarter (Jan – March) 2029

PFOS and PFOA: NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Pursuant to s. NR 106.98(3)(b), 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 permit was drafted, the department has determined the permittee does not need to sample for PFOS or PFOA as part of this permit reissuance. The department may re-evaluate the need for sampling at the next permit reissuance if new information becomes available that suggests PFOS or PFOA may be present in the discharge.

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)**
007	B	Liquid	The permittee has never removed sludge from the ponds and does not anticipate removing sludge this permit term.			
Does sludge management demonstrate compliance? Yes						
Is additional sludge storage required? No						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? No						
Is a priority pollutant scan required? No 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.						

3.1 Sample Point Number: 007- LAGOON SLUDGE

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Once	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Once	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Once	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Once	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Once	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Once	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Once	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Once	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Once	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Once	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Once	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Once	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Once	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Once	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Once	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Once	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Once	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Once	Composite	
Nitrogen, Total Kjeldahl		Percent	Per Application	Composite	
Nitrogen, Ammonia (NH3-N) Total		Percent	Per Application	Composite	
Phosphorus, Total		Percent	Per Application	Composite	
Phosphorus, Water Extractable		% of Tot P	Per Application	Composite	
Potassium, Total Recoverable		Percent	Per Application	Composite	
PFOA + PFOS		ug/kg	Once	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.
PFAS Dry Wt			Once	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					based on updated DNR PFAS List. See PFAS Permit Sections for more information.

3.2 Changes from Previous Permit:

Sludge limitations and monitoring requirements were evaluated for this permit term and the following changes described below were made from the previous permit:

List 2 Nutrient monitoring – Monitoring for list 2 (nutrients) is highly recommended at the same time as the monitoring of List 1 (metals) in year 2 of the permit. Results will assist in the determination of the acres needed for land application of sludge should it be necessary.

Change in form submittal – In prior permit reissuances when it has been noted in the application that sludge would not be removed during the permit term, the department required sampling during the second year of the permit term and the sludge characteristic report (3400-049) would be generated only during that year. Due to moving to electronic submittal of forms via Switchboard, forms 3400-049 ("Characteristics Report"), 3400-052 ("Other Methods of Disposal") and 3400-055 ("Annual Land Application") will now be generated by the department and the permittee will be required to submit all three reports each year of the permit term. This change was adopted to provide the permittee flexibility because many lagoon desludging projects can be unexpected, are delayed or staggered over multiple years. Additionally, it is used to officially report that no land application of sludge has occurred, and annual submittal of the forms is required per the standard requirements section.

PFAS – Monitoring for PFAS has been added once during the permit term pursuant s. NR 204.06(2)(b)9., Wis. Adm. Code.

PCB sludge sampling has been waived this permit term because Pittsville is a lagoon facility with a design flow under 0.25 MGD, they no longer have industrial contributors, and they sampled their sludge for PCBs during the previous permit term.

3.3 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including 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). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements.

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 this WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

4 Schedules

4.1 Phosphorus Multi-Discharger Variance Interim Limit (0.6 mg/L)

This compliance schedule requires the permittee to achieve compliance with the specified MDV interim effluent limit in accordance with s. 283.16(6), Wis. Stats., by the due date.

Required Action	Due Date
Report on Effluent Discharges: Submit a report on effluent discharges of phosphorus with conclusions regarding compliance.	06/30/2025
Action Plan: Submit an action plan for complying with the specified interim effluent limit. If construction is required, include plans and specifications with the submittal.	12/31/2025
Initiate Actions: Initiate actions identified in the plan.	12/31/2026
Progress Report: Permittee shall submit a report summarizing the steps taken within the action plan to meet the monthly average interim phosphorus MDV limit of 0.6 mg/L.	12/31/2027
Progress Report: Permittee shall submit a report summarizing the steps taken within the action plan to meet the monthly average interim phosphorus MDV limit of 0.6 mg/L.	12/31/2028
Complete Actions: Complete actions identified in the plan and achieve compliance with the specified interim effluent limit with the phosphorus interim effluent limit of 0.6 mg/L.	09/30/2029

Explanation of Schedule: Subsection 283.16(6), Wis. Stats., establishes required interim phosphorus effluent limits that must be met for multi-discharger variance (MDV) eligibility. The facility has indicated that they cannot meet an interim limit of 0.6 mg/L without a facility upgrade. The facility has begun the facility planning stage. In order to allow time for the plant to complete an upgrade, the schedule above provides the permittee almost five years to comply with that limit. The length of the compliance schedule will allow the permittee to address the I & I issues that contribute to effluent phosphorus levels.

4.2 Phosphorus Payment per Pound to County

The permittee is required to make annual payments for phosphorus reductions to the participating county or counties in accordance with s. 283.16(8), Wis. Stats, and the following schedule. The price per pound will be set at the time of permit reissuance and will apply for the duration of the permit.

Required Action	Due Date
Annual Verification of Phosphorus Payment to County: The permittee shall make a total payment to the participating county or counties approved by the Department by March 1 of each calendar year. The amount due is equal to the following: [(lbs of phosphorus discharged minus the permittee's target value) times ($64.75 per pound)] or $640,000, whichever is less. See the payment calculation steps in the Surface Water section. The permittee shall submit Form 3200-151 to the Department by March 1 of each calendar year indicating total amount remitted to the participating counties to verify that the correct payment was made. The first payment verification form is due by the specified Due Date. Note: The applicable Target Value is 0.2 mg/L as defined by s. 283.16(1)(h), Wis. Stats. The "per pound" value is $50.00 adjusted for CPI.	03/01/2025

Annual Verification of Payment #2: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2026
Annual Verification of Payment #3: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2027
Annual Verification of Payment #4: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2028
Annual Verification of Payment #5: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2029
Continued Coverage: If the permittee intends to seek a renewed variance, an application for the MDV (Multi Discharger Variance) shall be submitted as part of the application for permit reissuance in accordance with s. 283.16(4)(b), Wis. Stats.	
Annual Verification of Payment After Permit Expiration: In the event that this permit is not reissued prior to the expiration date, the permittee shall continue to submit Form 3200-151 to the Department indicating total amount remitted to the participating counties by March 1 each year.	

Explanation of County Payment Schedule: Subsection 283.16(6)(b), Wis. Stats., requires permittees that have received approval for the multi-discharger variance (MDV) to implement a watershed project that is designed to reduce non-point sources of phosphorus within the HUC 8 watershed in which the permittee is located. The permittee has selected the "Payment to Counties" watershed option described in s. 283.16(8), Wis. Stats. Under this option the permittee shall make annual payment(s) to participating county(s) that are calculated based on the amount of phosphorus actually discharged during a calendar year in pounds per year less the amount of phosphorus that would have been discharged had the permittee discharged phosphorus at a target value concentration of 0.2 mg/L. The pounds of phosphorus discharged in excess of the target value is multiplied by a per pound phosphorus charge that will equal $64.75 per pound. This schedule requires the permittee to submit Form 3200-151 to the Department indicating the total amount remitted to the participating county(s).

4.3 Phosphorus Schedule - Continued Optimization

The permittee is required to optimize performance to control phosphorus discharges per the following schedule.

Required Action	Due Date
Optimization: The permittee shall continue to implement the optimization plan as previously approved to optimize performance to control phosphorus discharges. Submit a progress report on optimizing removal of phosphorus by the Due Date.	12/31/2025
Progress Report #2: Submit a progress report on optimizing removal of phosphorus.	12/31/2026
Progress Report #3: Submit a progress report on optimizing removal of phosphorus.	12/31/2027
Progress Report #4: Submit a progress report on optimizing removal of phosphorus.	12/31/2028
Progress Report #5: Submit a progress report on optimizing removal of phosphorus.	12/31/2029

Explanation of Continued Optimization Schedule: Per s. 283.16(6)(a), Wis. Stats. the Department may include a requirement that the permittee optimize the performance of a point source in controlling phosphorus discharges, which may be necessary to achieve compliance with multi-discharger variance interim limits. This compliance schedule requires the permittee to continue to implement the optimization plan that was approved during the previous permit term.

4.4 Sludge Management Plan

Required Action	Due Date
Submit a Sludge Management Plan: The permittee shall submit a management plan for approval if removal of sludge will occur during this permit term. The plan shall demonstrate compliance with ch. NR 204, Wis. Adm. Code and at minimum address 1) How and where is sludge sampled; 2) Available sludge storage details and location(s); 3) How will the sludge be removed with details on volume, characterization and how will the treatment plant continue to function during the drawdown; 4) Describe the type of transportation and spreading vehicles and loading and unloading practices; 5) Identify approved land application sites, apply for needed sites, site limitations, total acres needed and vegetative cover management; 6) Specify record keeping procedures including site loading; 7) Address contingency plans for adverse weather and odor/nuisance abatement; and 8) Include any other pertinent information such as other disposal options that may be used or specifications of any pretreatment processes Once approved, all sludge management 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. No desludging may occur unless approval from the Department is obtained. Daily logs shall be kept that record where the sludge has been disposed. The plan is due at least 60 days prior to desludging.	

Explanation of Sludge Management Plan Schedule: If the lagoons are to be de-sludged during this permit term, a management plan is needed to show compliance with ch NR 204, Wis. Adm. Code that clearly explains how the sludge will be safely removed, what contingencies are in place, the type of equipment that will be used and how the sludge will be land applied to ensure the proper precautions are in place to prevent any negative impacts to surface water or groundwater.

Other Comments

Publishing Newspaper: The Pittsville Record, 8265 Main St, Pittsville, WI 54466-9254

Attachments:

- Water Quality Based Effluent Limits: December 4, 2024 memo from Ben Hartenbower to Holly Heldstab titled "Water Quality-Based Effluent Limitations for the Whitehall Wastewater Treatment Facility WPDES Permit No. WI-0030970"
- MDV Evaluation Checklist, completed by Matt Claucherty, dated 09/06/2024
- MDV Conditional Approval Letter, completed by Matt Claucherty, dated 09/06/2024

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance.

Prepared By: Holly Heldstab, Wastewater Specialist **Date:** December 27, 2024