PERMIT FACT SHEET

General Information

Permit Number:	WI-0012345-01-0
Permit Name:	PFAS Monitoring for Sewage Sludge (Biosolids) Generators
Permittee:	Sewage sludge generators that discharge sewage sludge (biosolids) within the state of Wisconsin.
Discharge Location:	N/A - PFAS monitoring only
Receiving Water:	N/A - PFAS monitoring only

WPDES Permit Program Background

Chapter 283 of Wisconsin Statutes requires a Wisconsin Pollutant Discharge Elimination System (WPDES) permit for the discharge of any pollutant through a point source into any Waters of the State, which includes surface waters and groundwater. WPDES permits are issued by the Wisconsin Department of Natural Resources (department) consistent with applicable federal requirements. These permits contain requirements that include pollutant discharge limitations, monitoring and reporting or record keeping requirements, best management practices and other provisions to reduce, eliminate, or minimize the risk of pollutants impacting human health and water quality. A WPDES permit is an allowance for a facility to discharge a specified amount of a pollutant into the Waters of the State under specific conditions. There are two basic types of WPDES permits:

- Individual Permit (IP). An individual permit is a permit specifically tailored to an individual facility. Once a facility submits a complete application(s), the department develops a draft permit for that particular facility based on the information contained in the IP application (e.g., type of activity, nature of discharge, receiving water quality). After a public participation process, the department may issue the permit to the facility for a specific time period (not to exceed five years) with a requirement that the facility reapply 180 days prior to the expiration date. Public notices are posted for each IP application and proposed IP permittee.
- General Permit (GP). A general permit covers a group or category of dischargers with similar qualities within a designated area of the state under one WPDES permit. A general permit provides coverage to several dischargers. GPs have an effective term of 5 years from the date of issuance. Upon department approval and coverage under a general permit, the discharge of pollutants is then subject to all conditions of the GP and these terms or conditions shall continue to apply

until the effective date of the reissued general permit. Public notices are issued for the general permit and not for the permittee covered under the GP.

General Permit Objective

This "PFAS Monitoring for Sewage Sludge (Biosolids) Generators" WPDES general permit (GP) is created to meet the requirements of 2025 ACT 201 specified in ss. 283.82(4)(b), Wis. Stats. The statutory language requires the GP to be issued to sewage sludge generators that do not have sewage sludge perfluoroalkyl and polyfluoroalkyl (PFAS) monitoring conditions in the sewage sludge generator's WPDES individual permit.

General Permit Description

Facilities that receive and treat domestic and non-domestic wastewater are commonly referred to as wastewater treatment facilities (WWTFs). Through treatment of these wastewaters, these facilities generate a non-Exceptional Quality (non-EQ) sludge commonly referred to as sewage sludge or biosolids. Some facilities further treat the sewage sludge to generate an Exceptional Quality (EQ) sludge.

Note: EQ sludge is sewage sludge that meets Class A requirements for pathogens, the high-quality metal pollutant concentrations, and one of the pre-land application processes to reduce vector attraction. While Class A sludge is not necessarily equivalent to EQ sludge, these terms are often used synonymously. Additionally non-EQ sewage sludge is often referred to as Class B sludge. Non-EQ sludge could include Class A sludge under specific situations, for example when the sludge does not meet high quality metal concentration limits or pathogen retest results do not meet Class A storage discharge requirements. Non-EQ sludge must meet additional requirements to be land applied on department-approved fields.

The treatment, use, and disposal of sewage sludge is regulated under ch. NR 204, Wis. Adm. Code, entitled "Domestic Sewage Sludge Management."

Sewage sludge generators discharge through sewage sludge sample point outfalls (Outfalls) in the following ways:

- Land application on department-approved agricultural fields,
- Transfer to other WPDES permitted locations (including but not limited to other WWTFs, regional biosolids receiving centers, and contract haulers),
- Disposal at licensed incinerators,
- Disposal at licensed landfills, and
- Out-of-state transfer or disposal (which includes, but not limited to, out-of-state WWTFs for additional treatment, out-of-state incinerators, out-of-state landfills,

and land application to out-of-state agricultural lands through an out-of-state permitted land application program.

Note: In Wisconsin, EQ sludge may be applied to lawns and home gardens as well as other sites allowed under ch. NR 204, Wis. Adm. Code. EQ sludge is considered not to pose any reasonably anticipated threat to public health or the environment and is therefore exempt from many requirements of ch. NR 204, Wis. Adm. Code (reference: s. NR 204.04, Wis. Adm. Code).

Land application of sewage sludge is considered a discharge to groundwater. The definition of "waters of the state" includes groundwater (s. 283.1(20), Wis. Stats.). A WPDES permit is required for the lawful discharge of any pollutants into the waters of the state; therefore, a WPDES permit is required for the land application sewage sludge (references: s. 283.31(2), Wis. Stats. and s. NR 204.01, Wis. Adm. Code). It is the purpose of ch. NR 204, Wis. Adm. Code to establish discharge limits and monitoring standards for the use and disposal of sewage sludge. Chapter NR 204, Wis. Adm. Code requirements protect public health and aim to restore, protect and maintain the physical, chemical and biological integrity of the soil, air, surface water and groundwater of the state and to allow no detrimental effects to these resources, and the natural environment. The beneficial use of sewage sludge and its recycling to the land as a fertilizer or soil conditioner is encouraged, rather than disposing of sludge through incineration or landfilling (reference: s. NR 204.01, Wis. Adm. Code).

During treatment, sewage sludges are stabilized and undergo significant reduction in pathogens prior to use as a soil amendment, conditioner, and/or fertilizer replacement product. Treatment processes differ at each WWTF, resulting in various forms of sewage sludge such as liquids, cakes, or dried pellet-like products. In Wisconsin, approximately 85 percent of sewage sludges generated are beneficially reused through land application and distributed as EQ sludge.

The department operates its biosolids program under delegated federal authority from United States Environmental Protection Agency (EPA). Wisconsin's Sewage Sludge Program conforms to EPA 40 CFR Part 503 and is authorized and implemented by chapters 283, Wis. Stats., and NR 204, Wis. Adm. Code. EPA is required to review sewage sludge regulations biennially to evaluate and identify additional toxic pollutants that occur in sewage sludge and set regulations for those pollutants if sufficient scientific evidence demonstrates that the pollutants may harm human health or the environment.

PFAS have been classified by the EPA as emerging contaminant(s) at the national level. PFAS are a suite of over 4,000 chemicals historically used in thousands of applications throughout the industrial, food, and textile industries. Some historical uses include, but are not limited to, firefighting foams, food packaging, mist suppressants associated with metal finishers and platers, and cleaning products. Materials containing PFAS were and

continue to be used by many industries such as plating, tanneries, or clothing manufacturers, where waterproofing may be required, or a protective film is needed in a manufacturing process.

Note: EPA is currently reviewing and conducting a risk assessment for additional pollutants, including specific PFAS compounds that have been identified in biosolids nationwide. The department will continue to follow EPA's PFAS biosolids risk assessment activities, assist where possible, and follow-up in Wisconsin as necessary.

Land application of sewage sludge not impacted by industrial PFAS contamination is an appropriate beneficial reuse for nutrients and carbon amendments to agricultural soils. Landfilling and incinerating sewage sludge are often costly for ratepayers and eliminates the ability to reuse the nutrients and soil conditioning benefits that sewage sludges provide.

On April 6, 2026, Act 201was enacted creating s. 283.82(4), Wis. Stats. Which directed the department to create a Wisconsin Pollution Discharge Elimination System (WPDES) general permit requiring perfluoroalkyl and polyfluoroalkyl substances (PFAS) monitoring conditions for sewage sludge. As required by 2025 Act 201, the department created the "PFAS Monitoring for Sewage Sludge (Biosolids) Generators" general permit (permit number WI-0012345-01-0). 2025 ACT 201 requires this GP to be issued to WPDES permittees who do not possess PFAS monitoring in the permittees' current individual permit.

Note: Section NR 205.08, Wis. Adm. Code, authorizes the department to issue a general permit applicable to a designated area of the State authorizing discharges from specified categories or classes of point sources located within that area if they (1) Perform the same or substantially similar operations; (2) Produce the same types of wastewater streams; (3) Employ the same or substantially similar wastewater treatment operations to control specific pollutants; (4) Are subject to the same effluent limitations and monitoring requirements; and (5) In the opinion of the department, are more appropriately controlled under a general permit than under individual permits.

General Permit Summary

This GP establishes applicability criteria, PFAS monitoring conditions, reporting requirements, operational requirements, and standard requirements for sewage sludge generators.

Fact Sheet Organization

This fact sheet serves to explain the rationale and assumptions used in deriving the conditions and requirements set forth in the GP. The sections that follow are taken from the permit and are numbered in this fact sheet as they are numbered in the GP.

1 Requirements of 2005 Act 201

On April 6, 2026, 2025 ACT 201 was enacted creating s. 283.82(4), Wis. Stats., directing the Wisconsin Department of Natural Resources (department) to issue Wisconsin Pollution Discharge Elimination System (WPDES) permits requiring perfluoroalkyl and polyfluoroalkyl substances (PFAS) monitoring conditions for sewage sludge. To ensure all sewage sludge generators have PFAS monitoring requirements in a WPDES permit the Act requires general permit (GP) coverage be issued to all permittees that do not have limits or conditions on PFAS substances in a WPDES Individual Permit (IP).

In addition, s. 283.82(4)(b), Wis. Stats., requires the department to modify a sewage sludge generator's WPDES individual permit (IP) if monitoring results under the GP exceed a 20 µg/kg concentration for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) combined.

The department created WPDES GP (permit number WI-0012345-01-0) to cover sewage sludge generators (generator) which do not have PFAS conditions in the generator's WPDES IP. A sewage sludge generator is no longer eligible for coverage under this GP upon modification or reissuance of the generator's WPDES IP to include PFAS monitoring and conditions.

2 Applicability Criteria

According to s. NR 205.08(2), Wis. Adm. Code, the department may include applicability criteria in general permits.

2.1 Definitions and Responsibility

This section of the permit references relevant definitions and responsibilities from ch. NR 204, Wis. Adm. Code, additional definitions and responsibilities can be found in this chapter.

Relevant Definitions

Agricultural land - The land on which a food crop, a feed crop or fiber crop will be grown within 12 months following sludge application. This includes range land and land used as pasture. (s. NR 204.03(2), Wis. Adm. Code).

Bag or Bagged - "Bag or other container" or "bagged" or "bag" is either a bag or an open or closed receptacle that has a capacity of one metric ton or less. This includes a bucket, a box, a carton and a vehicle or trailer. (s. NR 204.03(8), Wis. Adm. Code).

Biosolids - Synonymous with sewage sludge or sludge. See sewage sludge definition.

Bulk sewage sludge - Sewage sludge which will be applied to the land but is not bagged. (s.NR 204.03(10), Wis. Adm. Code).

Exceptional quality sludge (EQ) - Sludge that meets the class A requirements for pathogens, as specified in s. NR 204.07(6)(a), Wis. Adm. Code, the high-quality pollutant concentrations, as specified in s. NR 204.07(5)(c), Wis. Adm. Code, and one of the pre-land application processes to reduce vector attraction, as specified in s. NR 204.07(7)(a) to (i), Wis. Adm. Code. (s. NR 204.03(19), Wis. Adm. Code).

Generator - Either the person who generates or prepares sludge during the treatment of domestic sewage in a treatment works or the person who derives a material from sludge or the person who changes the sludge characteristics either through treatment, mixing or any other process. (**s.** NR 204.03(24), Wis. Adm. Code). Pursuant to s. NR 204.02(2), Wis. Adm. Code, generators also include WPDES permitted contractors who temporarily mix, store, and land apply wastes containing sewage sludge.

High quality sludge - Sludge that meets the monthly average pollutant concentration limits which are shown, as Table 3, in s. NR 204.07(5)(c), Wis. Adm. Code (s. NR 204.03(29), Wis. Adm. Code).

Land application - The spraying or spreading of sludge onto the land surface, the injection of sludge below the land surface, or the incorporation of sludge into the soil. Sludge can either condition the soil or fertilize crops or vegetation grown in the soil. (s. NR 204.03(33), Wis. Adm. Code).

Major municipal discharge (or "major sewage sludge generator") - a point source discharge with an average daily volume equal to or greater than one million gallons per day of either municipal wastewater from a publicly owned treatment works or of domestic wastewater from a privately owned treatment works (s. NR 200.02(7), Wis. Adm. Code).

Note: See Appendix A for a list of all Major municipal dischargers in the state of Wisconsin. Some of these dischargers may already have PFAS monitoring requirements in their WPDES IP.

Minor municipal discharge (or "minor sewage sludge generator") - a point source discharge with an average daily volume less than one million gallons per day of either municipal wastewater from a publicly owned treatment works or domestic wastewater from a privately owned treatment works (s. NR 200.02(8), Wis. Adm. Code).

Person - An individual, owner, operator, association, partnership, corporation, municipality, interstate agency, state agency or federal agency. (s. NR 204.09(41), Wis. Adm. Code).

Sewage sludge - Synonymous with sludge or biosolids. It is the solid, semi-solid or liquid residue generated during the treatment of domestic sewage in a treatment works. Sewage sludge includes scum or solids removed in primary; secondary or advanced wastewater treatment processes and material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of a sewage sludge incinerator or grit and screenings generated during preliminary treatment of domestic sewage in a treatment works. (s. NR 204.03(55), Wis. Adm. Code).

Sludge - Synonymous with sewage sludge or biosolids. See sewage sludge definition.

Responsibilities

The intent of this section is to provide relevant Wisconsin Administrative Code requirements for establishing sewage sludge generators and sewage sludge generator responsibilities (including WPDES permitted contract haulers).

Section NR 204.02(2), Wis. Adm. Code, identifies sewage sludge generators responsibility for land application and disposal of sewage sludge, specifically:

> "RESPONSIBILITY. A facility that generates sludge is ultimately responsible for the handling, transporting, storage and land application or disposal of the sludge and grit and screenings. A generator is responsible for compliance with its WPDES permit and all applicable provisions of this chapter. In the event a generator sends its sludge to another person for final land application or disposal and that person alters the characteristics of the sludge by mixing it with other wastes or substances or by treating it in some other manner, then the person who receives the sludge shall also be considered a generator and shall assume primary responsibility for compliance with this chapter. If a generator gives the sludge to another person to land apply, but that person does not alter the characteristics of the sludge, then that person is also responsible for complying with applicable provisions in this chapter, such as the land management practices specified in s. NR 204.07, Wis. Adm. Code."

Section NR 204.05(2)(a), Wis. Adm. Code, specifies WPDES permit requirements when sewage sludge is sent to another facility for treatment or storage, specifically:

> "If a treatment works sends its sludge to another treatment or storage facility for final treatment prior to land application, and at that facility, the sludge is mixed with other materials such as, but not limited to another municipal sludge, industrial sludge, animal manure or septage, or if the characteristics of the sludge are altered in any other manner, the owner of the receiving facility shall apply for a separate WPDES permit and shall assume primary responsibility for compliance with this chapter."

2.2 Sewage Sludge Generators Covered

This GP is applicable to all sewage sludge (or "sludge" or "biosolids") generators that do not currently have PFAS monitoring conditions in the assigned WPDES IP, including:

- Generators of EQ or non-EQ sewage sludge;
- Generators of non-EQ sludge outside of the State of Wisconsin who land apply sludge in Wisconsin;
- Centralized septage treatment facilities which accept septage from multiple sources and treat septage prior to discharge or disposal; and
- WPDES permitted contract haulers or other persons that temporarily store and mix sewage sludges or mix sewage sludges with other materials.

2.3 Alternative Uses of Sewage Sludge

Chapter NR 204, Wis. Adm. Code, allows alternative uses of sewage sludge with department approval. This section lists PFAS monitoring conditions for alternative uses of sewage sludge.

2.4 Activities and Wastes Not Covered

According to s. NR 205.08(1) and (2), Wis. Adm. Code, general permits may exclude specified sources from coverage. This section provides a list of facilities or activities not covered under this GP. The section also includes applicable Statutory and Administrative Code references for excluded wastes. Excluded wastes include, but are not limited to:

- Sewage sludge generators that currently have PFAS monitoring requirements included in their WPDES IP,
- Ash from sewage sludge that has been incinerated,
- Bagged EQ sludge that originates from another state,
- Landspreading of industrial liquid waste, industrial sludge or industrial by-product solids (which are not mixed with sewage sludge),
- Land application of temporarily stored septage (which are not mixed with sewage sludge),
- Permitted contractors that temporarily store, mix and landspread industrial wastes,
- Permitted contractors that temporarily store, mix and landspread industrial wastes with septage,

- Land application of manure (which are not mixed with sewage sludge), and
- Land application of sludge generated from drinking water treatment.

3 Sewage Sludge Sample Point Outfall Monitoring Specifics

This WPDES GP has been developed as a supplemental permit to all WPDES IP sewage sludge generators whose WPDES IPs do not include PFAS monitoring requirements. Generators shall refer to the sewage sludge outfalls designated under their WPDES IP. PFAS monitoring data shall be recorded under the Switchboard account for their WPDES IP.

3.1 Sewage Sludge Outfalls: General

Most sewage sludge WPDES IPs have one or two sewage sludge sample point Outfalls for discharging sewage sludge. Some sewage sludge WPDES IPs have additional outfalls to accommodate EQ sludge treatment processes. Additionally, many WPDES IPs with EQ treatment processes have additional sewage sludge Outfalls in the event that specific pre- and post-processes require the sludge(s) to be diverted for other types of disposal.

3.2 WPDES IPs with Single Sewage Sludge Outfalls

Generators with a single sewage sludge Outfall identified in the WPDES IP shall monitor PFAS annually at the Outfall pursuant to Sections 4, 5, and 6 of this WPDES GP. Annual PFAS monitoring is required from all sewage sludge sample point Outfalls when sewage sludge is discharged from those Outfalls during the calendar year.

3.3 WPDES IPs with Multiple Sewage Sludge Outfalls

The examples below demonstrate PFAS monitoring requirements for generators with multiple sewage sludge Outfalls:

EXAMPLE 1: Generator A has two sewage sludge Outfalls. The primary Outfall is non-EQ cake (Class B) identified as Outfall 004. The cake sludge is discharged (land applied) in the spring from the generator's sludge storage building. However, due to unavailability of a polymer in the fall, Generator A decides to discharge through the liquid sludge Outfall identified as Outfall 003.

Generator A must sample Outfall 004 in the spring prior to discharging and report the PFAS laboratory results. In the fall, when sludge is discharged through Outfall 003, Generator A must sample Outfall 003 prior to discharging and report the PFAS laboratory results

Note: The generator shall contact the assigned department compliance staff to create an additional electronic form to allow reporting Outfall 003 PFAS laboratory results.

EXAMPLE 2: Generator B can produce both EQ and non-EQ sewage sludge. Generator B produces EQ sludge on a regular basis. Discharge Outfalls include: liquid sludge (Outfall 002), cake sludge (Outfall 004), dried sludge located immediately after the heat drying treatment process (Outfall 005), and dried sludge located in a sewage storage building (Outfall 006). Primarily sewage sludge is discharged through Outfall 006 in the spring and fall. Generator B must monitor Outfall 006 prior to discharge and report the PFAS laboratory results. No other planned discharges occur through the other Outfalls, therefore PFAS monitoring is not required for Outfalls 002, 004 and 005.

Scenario 1. Thermal Event at WWTF: A thermal event occurs in the sewage sludge storage building midway through the year. The building is taken offline. Generator B begins discharging at Outfall 005. Additional PFAS monitoring is now required at Outfall 005. Generator B collects a dried sludge sample prior to discharge and reports the PFAS laboratory results.

Note: The generator shall contact the assigned department compliance staff to create an additional electronic form to allow reporting Outfall 005 PFAS laboratory results.

Scenario 2. Sludge Heat Dryer Malfunction: The sewage sludge heat dryer has a malfunction and is taken offline. Cake sludge is placed into the storage building. After a significant period, the generator decides to discharge sludge from Outfall 004. Additional PFAS monitoring is now required at Outfall 004. Generator B collects a cake sludge sample prior to discharge and reports the PFAS laboratory results.

Note: The generator shall contact the assigned department compliance staff to create an additional electronic form to report Outfall 004 PFAS laboratory results.

EXAMPLE 3: Generator C produces both EQ and non-EQ (Class B) sludge through alkaline treatment (Outfall 004) and alkaline stabilization treatment (Outfall 003). Both types of sewage sludge are discharged annually. Generator C must report PFAS laboratory results for both Outfalls 003 and 004.

EXAMPLE 4: Contract Hauler A has a WPDES IP. The contract hauler has two approved storage units. Storage Unit #1 (Outfall 001) is approved to receive, temporarily store, and mix sewage sludges from numerous clients. Storage Unit #2 (Outfall 002) is approved to temporarily store and mix industrial wastes from numerous clients (no sewage sludge is mixed in Storage Unit #2). Contract Hauler A occasionally mixes waste from Tank #1 and Tank #2 together (Outfall 003). Contract hauler A is considered a sewage sludge generator pursuant to s. NR 204.02(2), Wis. Adm. Code. The contract hauler landspreads mixed

waste from all three outfalls in the fall. Contract Hauler A collects samples from Outfalls 001 and 003 prior to discharge and reports the PFAS laboratory results.

Note: PFAS sampling is not required for Outfall 002 since this storage unit does not contain sewage sludge.

EXAMPLE 5: Generator D generates a non-EQ (Class B) sewage sludge and discharges this sludge through Outfall 003. Generator D hires Contract Hauler B to haul and store sewage sludge. Contract Hauler B has a WPDES IP.

Generator D samples the sludge from Outfall 003 prior to transfer to Contract Hauler B. Generator D reports the PFAS laboratory results on its monitoring reports.

Contract Hauler B receives and mixes this sewage sludge with other sewage sludges in a storage unit approved under its WPDES IP (Outfall 001). Contract Hauler B has now generated a sewage sludge as defined under NR 204.02 Wis. Adm. Code. Contract Hauler B samples the mixed sewage sludge prior to discharge and reports the PFAS laboratory results for Outfall 001 on its monitoring reports. Contract Hauler B then land applies the mixed sewage sludge on nearby agricultural fields.

EXAMPLE 6: Generator E generates a non-EQ (Class B) sewage sludge and discharges this sludge through Outfall 003. Generator E has an agreement with Regional Biosolids Receiving Facility A. Regional Biosolids Receiving Facility A further treats sewage sludge to EQ standards (Outfall 005).

Generator E must sample the sludge prior to transfer and report the PFAS laboratory results for Outfall 003 on its monitoring reports.

Regional Biosolids Receiving Facility A receives sewage sludge from Generator E. This sewage sludge along with sewage sludge from other facilities is mixed and further treated to become EQ sludge. Regional Biosolids Receiving Facility A must sample Outfall 005 prior to discharge and report the PFAS monitoring results on its monitoring reports

EXAMPLE 7: Generator F generates a non-EQ (Class B) sewage sludge and discharges this sludge through Outfall 003. Generator 4 hires Contract Hauler C to directly land apply sewage sludge. Contract Hauler C has a WPDES IP with a direct land application Outfall (Outfall 630) for Generator F. Generator F monitors sludge from Outfall 003 prior to Contract Hauler C directly land applying this sludge under Outfall 630. Generator F reports the PFAS laboratory results on its monitoring reports.

Contract Hauler C is not required to collect a PFAS sample for Outfall 630 because this sewage sludge was not mixed with other sludges or temporarily stored in hauler's storage units. The department recommends WPDES permitted contract haulers coordinate with

WPDES GP and IP sewage sludge generators prior to direct land applications to obtain PFAS laboratory results.

3.4 WPDES IPs Without a Sewage Sludge Outfall

Sewage sludge generators without a sewage sludge Outfall in the WPDES IP shall notify the department within 90 days if the generator intends to discharge sewage sludge. Any sewage sludge dischargers will require coverage under this GP or modification of the WPDES IP.

4 PFAS Monitoring Requirements for Sewage Sludge Generators

The following requirements shall apply to all EQ and non-EQ sewage sludge generators except those that apply under Sections 5 and 6.

4.1 Sampling Point(s)

Sampling Point Designation
Monitoring shall occur at all sewage sludge sample point Outfalls prior to discharge of sewage sludge via land application, distribution to other WPDES permitted facilities, or disposal at licensed incinerator or licensed landfill. The generator shall refer to the WPDES IP for the appropriate Outfall identification number(s) needed to complete the electronic Characteristic Report (Form 3400-49). Note: This section does not apply to WPDES permitted contract haulers, facilities with lagoon treatment processes, and facilities with reedbed treatment processes.

4.1.1 Land Application of Sludge Containing PFAS

The department recommends the land application of sewage sludge be completed in a manner consistent with the most recent version of the "Interim Strategy for Land Application of Biosolids and Industrial Sludges containing PFAS." This strategy provides the goals of PFAS monitoring and proposed interim limits and potential action items for a generator with PFAS concentrations above the listed thresholds. A link is provided in the GP to reach this living document.

4.1.2 Monitoring Requirements

The generator shall comply with the following monitoring requirements.

Parameter	Units	Sample Frequency	Sample Type	Notes
Solids, Total	Percent	Annual	Composite	
PFOA + PFOS	µg /kg	Annual	Calculated	Report the sum of PFOA and PFOS. Results greater than 20 µg/kg. See Permit Section 4.4.
PFAS Dry Wt.	µg/kg	Annual	Composite	See Permit Section 7.1 for Perfluoroalkyl and Polyfluoroalkyl substances.

4.2 PFAS Monitoring Frequencies

This section complies with s.283.82(4), Wis. Stats. and includes annual PFAS sewage sludge monitoring requirements for minor and major sewage sludge generators. All sewage sludge generators are required to monitor Outfalls between July 1, 2026 and June 30, 2027. Annual sewage sludge monitoring frequencies after January 1, 2027 are specified in the general permit. General permit coverage is discontinued once PFAS monitoring is included in the sludge generator's WPDES IP through modification or reissuance.

4.3 Reporting PFAS Monitoring

This section also details required PFAS reporting of laboratory results to the department. Sewage sludge generators must submit these reports via email for 2026. Sewage sludge generators will submit these reports via an electronic Characteristic Report (Form 3400-49) in 2027 and subsequent calendar years.

The department determined that an annual PFAS sewage sludge monitoring frequency is practical as an interim monitoring strategy to collect PFAS sewage sludge data through the GP. PFAS monitoring frequency may be customized to the needs of the generator when a WPDES IP is modified or reissued.

All sewage sludge generators that do not have PFAS in the WPDES IP will be issued this GP or have the WPDES IP modified.

4.4 Reporting PFOA + PFOS Concentrations That Exceed 20 µg/kg

This section covers reporting required when a PFAS laboratory results show PFOA+PFOS concentrations in sewage sludge exceeds 20 µg/kg. Reporting includes prompt notification to the department and mandatory retesting within 90 days.

5 Lagoons and/or Reedbeds Sewage Sludge PFAS Monitoring Requirements

5.1 Sampling Point(s)

Sampling Point Designation
For WWTFs that utilize lagoons or reed beds as sewage sludge treatment processes, monitoring shall occur from all lagoons or reed bed treatment between July 1, 2026, and June 30, 2027. After January 1, 2027, sewage sludge generators shall monitor at all Outfalls prior to discharge of sewage sludge via land application, distribution to other WPDES facilities, or disposal at licensed incinerator or licensed landfill. The generator shall refer to the WPDES IP for the appropriate Outfall identification number(s) needed to complete electronic Characteristic Report Form 3400-49.

5.1.1 Land Application of Sludge Containing PFAS

The department recommends the land application of sewage sludge be completed in a manner consistent with the most recent version of the "Interim Strategy for Land Application of Biosolids and Industrial Sludges containing PFAS." This strategy provides the goals of PFAS monitoring and proposed interim limits and potential action items for a generator with PFAS concentrations above the listed thresholds. A link is provided in the GP to reach this living document.

5.1.2 Monitoring Requirements

The generator shall comply with the following monitoring requirements.

Parameter	Units	Sample Frequency	Sample Type	Notes
Solids, Total	Percent	See Permit Section 5.2.2	Composite	
PFOA + PFOS	µg/kg	See Permit Section 5.2.2	Calculated	Report the sum of PFOA and PFOS. Results greater than 20 µg/kg. See Permit Section 5.4.

Parameter	Units	Sample Frequency	Sample Type	Notes
PFAS Dry Wt.	µg/kg	See Permit Section 5.2.2	Composite	See Permit Section 7.1 for Perfluoroalkyl and Polyfluoroalkyl substances.

5.2 PFAS Monitoring Frequencies

This section complies with s.283.82(4), Wis. Stats. and includes PFAS sewage sludge monitoring requirements for WWTFs with lagoon and reed bed treatment processes.

All sewage sludge generators are required to monitor discharge Outfalls between July 1, 2026, and June 30, 2027. If no sewage sludge discharge occurs between July 1, 2026, and June 30, 2027, the generator shall collect a representative sample of the treatment processes no later than June 30, 2027.

Lagoon and reed bed facilities infrequently discharge sewage sludge. Sewage sludge monitoring is difficult from these treatment processes. Sewage sludge removal (or discharge) is costly, time consuming, laborious, and requires significant planning to empty full (or nearly full) treatment processes. Any delays to these projects may pose significant costs and potential environmental risks.

After January 1, 2027, lagoon and reed bed treatment processes are required to monitor PFAS prior to any discharge event.

General permit coverage is discontinued once PFAS monitoring is included in the generator's WPDES IP through modification or reissuance.

This section also details required PFAS reporting of laboratory results to the department. Sewage sludge generators must submit these reports via email for 2026. Sewage sludge generators will submit these reports via an electronic Characteristic Report (Form 3400-49) in 2027 and subsequent calendar years.

5.3 Reporting PFAS Monitoring

This section details required PFAS reporting of laboratory results to the department. Sewage sludge generators must submit these reports via email for 2026. Sewage sludge generators will submit these reports via an electronic Characteristic Report (Form 3400-49) in 2027 and subsequent calendar years.

The department determined an annual PFAS sewage sludge monitoring frequency is practical as an interim monitoring strategy to collect PFAS sewage sludge data through

the GP. PFAS monitoring frequency may be customized to the needs of the generator when a WPDES IP is modified or reissued.

All sewage sludge generators that do not have PFAS in the WPDES IP will be issued this GP or have the WPDES IP modified.

5.4 Reporting PFOA + PFOS Concentrations That Exceed 20 µg/kg

This section covers reporting required when a PFAS laboratory result shows PFOA+PFOS concentrations in sewage sludge exceeds 20 µg/kg. Reporting includes prompt notification to the department and mandatory retesting within 90 days.

6 WPDES Permitted Contract Hauler PFAS Monitoring Requirements

The generator shall comply with the following requirements.

6.1 Sampling Point(s)

Sampling Point Designation
Monitoring shall occur at all sewage sludge and mixed waste sewage sludge Outfalls prior to discharge of sewage sludge via land application, distribution to other WPDES facilities, disposal at a licensed incinerator or licensed landfill, except sewage sludge direct land application Outfalls. The generator shall refer to the WPDES IP for the appropriate sampling point number and sampling location. Note: PFAS monitoring for municipal sewage sludge that is directly land applied is the responsibility of the sewage sludge generator. WPDES permitted contract haulers are not required to monitor direct land application sewage sludge outfalls. The department recommends WPDES permitted contract haulers coordinate with WPDES GP and IP sewage sludge generators prior to direct land applications to obtain PFAS laboratory results.

6.1.1 Land Application of Sludge Containing PFAS

The department recommends the land application of sewage sludge be completed in a manner consistent with the most recent version of the "Interim Strategy for Land Application of Biosolids and Industrial Sludges containing PFAS." This strategy provides the goals of PFAS monitoring and proposed interim limits and potential action items for a generator with PFAS concentrations above the listed thresholds. A link is provided in the GP to reach this living document.

6.1.2 Monitoring Requirements

The generator shall comply with the following monitoring requirements.

Parameter	Units	Sample Frequency	Sample Type	Notes
Solids, Total	Percent	Annual	Composite	
PFOA + PFOS	µg/kg	Annual	Calculated	Report the sum of PFOA and PFOS. Results greater than 20 µg/kg. See Permit Section 6.4
PFAS Dry Wt	µg/kg	Annual	Composite	See Permit Section 7.1 for Perfluoroalkyl and Polyfluoroalkyl substances.

6.2 PFAS Monitoring Frequencies

This section complies with s.283.82(4), Wis. Stats. and includes annual PFAS sewage sludge monitoring requirements contract haulers that generate sewage sludge under a WPDES IP. All sewage sludge generators are required to monitor Outfalls between July 1, 2026, and June 30, 2027. Annual sewage sludge monitoring frequencies after January 1, 2027, are specified in the general permit. General permit coverage is discontinued once PFAS monitoring is included in the sludge generator's WPDES IP through modification or reissuance.

This section also details required PFAS reporting of laboratory results to the department. Sewage sludge generators must submit these reports via email for 2026. Sewage sludge generators will submit these reports via an electronic Characteristic Report (Form 3400-49) in 2027 and subsequent calendar years.

6.3 Reporting PFAS Monitoring

This section also details required PFAS reporting of laboratory results to the department. Sewage sludge generators must submit these reports via email for 2026. Sewage sludge generators will submit these reports via an electronic Characteristic Report (Form 3400-49) in 2027 and subsequent calendar years.

The department determined that an annual PFAS sewage sludge monitoring frequency is practical as an interim monitoring strategy to collect PFAS sewage sludge data through the GP. PFAS monitoring frequency may be customized to the needs of the generator when a WPDES IP is modified or reissued.

All sewage sludge generators that do not have PFAS monitoring in their WPDES IP will be issued coverage under this GP or have their WPDES IP modified to add PFAS monitoring.

6.4 Reporting PFOA + PFOS Concentrations That Exceed 20 µg/kg

This section covers reporting required when a PFAS laboratory result shows PFOA+PFOS concentrations in sewage sludge exceeds 20 µg/kg. Reporting includes prompt notification to the department and mandatory retesting within 90 days.

7 General PFAS Conditions

This section identifies the PFAS substances that must be monitored for each discharge Outfall, the requirements for collecting a representative sewage sludge sample, the laboratory certification requirements to perform PFAS testing, and the requirements to certify PFAS laboratory results to the department on the electronic Characteristic Reports (Form 3400-49).

8 Standard Requirements

The permit provides a Standard Requirements section that contains conditions and requirements that are, for the most part, applicable to all WPDES general permits.

9 Summary of Reports Due

A summary of reports due has been added for informational purposes for the permittee and to be consistent with other WPDES permits.

Appendix A

The appendix includes a table of all major municipal dischargers in the State of Wisconsin.

Note: The individual permit of some facilities included on the list may have been modified or reissued to include sewage sludge PFAS monitoring requirements since issuance date of this WPDES GP.