

Permit Fact Sheet

General Information

Permit Number:	WI-0050237-09-0
Permittee Name:	Agropur Inc Luxemburg
Address:	N2915 County Road AB
City/State/Zip:	Luxemburg WI 54217-7713
Discharge Location:	500 feet Northwest of the intersection of Cherneyville Rd and County Rd AB
Receiving Water:	Unnamed tributary of the East Twin River
Stream Flow (Q _{7,10}):	0 cfs
Stream Classification:	The immediate receiving stream (WBIC 3000213) and the next stream downstream (WBIC 3000212) to where it meets the unnamed tributary of the East Twin River (approximately 1.5 miles downstream of the outfall) are classified as limited aquatic life (LAL). The unnamed tributary to the East Twin River (WBIC 3000211) has a warmwater sport fishery (WWSF) classification. The East Twin River (WBIC 84000), approximately 3 miles downstream of the outfall, has a coldwater classification.

Facility Description

Agropur Inc in Luxemburg operates a cheese manufacturing and whey processing facility in southern Kewaunee County. The facility and wastewater treatment plant (WWTP) were upgraded in 2014 to accommodate an increased flow from a production increase. The WWTP currently consists of an equalization tank, anaerobic conditioning tank, two anaerobic digesters, anoxic selector tank, aeration basin, secondary clarification, post aeration tank, and a DAF and belt filter press for sludge dewatering and thickening. Chemical addition of ferric chloride and polymer are added for phosphorus removal and additional sludge thickening and solids removal, respectively. Outfall 009 discharges to an unnamed tributary of the East Twin River and consists of the combination of treated process wastewater, excess polished condensate of whey (COW), retentate from the industrial reverse osmosis (RO) unit, and noncontact cooling water (NCCW). High strength wastewater that was previously segregated and land applied is now treated in the WWTP and discharged as treated process wastewater. The facility still has the option of segregating high strength waste for land application to approved sites and storage facilities via Outfall 002, as necessary. The high strength wastewater could be comprised of whey, whey-by-products, permeate, antibiotic contaminated milk, separator desludge and/or cooker water. Sludge from the WWTP was previously land applied on approved sites via Outfall 004 but is now disposed of at a landfill. The facility still has the option of land applying sludge to approved sites via Outfall 004 if that is deemed necessary. An additional emergency outfall (Outfall 005) has been retained for land application of untreated process wastewater in the event of an emergency.

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, Waste Type/sample Contents and Treatment Description (as applicable)
703	N/A – this sample point does not require flow monitoring	Influent sampled prior to the wastewater treatment plant.

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, Waste Type/sample Contents and Treatment Description (as applicable)
002	No land application in 2020; total of 428,708 gallons disposed of via manure pit.	Representative samples of the high strength wastewater shall be obtained from the storage vessel or truck prior to land application on approved sites. The wastewater could be comprised of whey, whey by-products, permeate, antibiotic contaminated milk, separator desludge &/or cooker water.
004	No land application in 2020; total of 313,143 gallons hauled to another facility and 602 tons disposed of via landfill.	Representative samples of waste activated sludge shall be obtained prior to land application on approved sites. Most disposal for this waste type is to a landfill although land application is also approved.
005	No land application in 2020; total of 59,175 gallons disposed of via manure pit.	Representative samples of untreated process wastewater shall be obtained prior to land application on approved sites.
009	0.65 MGD avg 4/1/16-8/31/20 (0.68 MGD avg 1/1/20-12/31/20)	This outfall consists of the combination of treated process wastewater, excess polished condensate of whey from the whey plant, retentate from the industrial water treatment reverse osmosis equipment and noncontact cooling water from the cheese plant. Representative samples of the combination of wastewaters shall be obtained prior to discharge to an unnamed tributary of the East Twin River.
109	677,109 gpd avg 1/1/20-12/31/20	Flow shall be estimated on the total influent to the wetwell which is at the head end of the wastewater treatment plant. The wastewaters consist of excess polished condensate of whey, retentate from the industrial water treatment reverse osmosis system and noncontact cooling water.

1 Influent - Proposed Monitoring

Sample Point Number: 703- TREATMENT PLANT INFLUENT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
BOD5, Total		mg/L	Weekly	24-Hr Comp	
Phosphorus, Total		mg/L	Weekly	24-Hr Comp	

Changes from Previous Permit:

- No changes from the previous permit.

Explanation of Limits and Monitoring Requirements

This monitoring assists the facility with the operation of the treatment plant.

2 In-Plant - Proposed Monitoring and Limitations

Sample Point Number: 109- WWTP INFLUENT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		gpd	Weekly	Total Daily	

Changes from Previous Permit:

- No changes from the previous permit.

Explanation of Limits and Monitoring Requirements

This monitoring assists the facility with the operation of the treatment plant.

3 Surface Water - Proposed Monitoring and Limitations

Sample Point Number: 009- COMB WW to TRIB of EAST TWIN R

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Daily Max	40 mg/L	2/Week	24-Hr Comp	
BOD5, Total	Monthly Avg	20 mg/L	2/Week	24-Hr Comp	
BOD5, Total	Daily Max	158 lbs/day	2/Week	Calculated	
BOD5, Total	Monthly Avg	79 lbs/day	2/Week	Calculated	
Suspended Solids, Total	Daily Max	40 mg/L	2/Week	24-Hr Comp	
Suspended Solids, Total	Monthly Avg	20 mg/L	2/Week	24-Hr Comp	
Suspended Solids, Total	Daily Max	201 lbs/day	2/Week	Calculated	
Suspended Solids, Total	Monthly Avg	100 lbs/day	2/Week	Calculated	
Dissolved Oxygen	Daily Min	4.0 mg/L	2/Week	Grab	
pH Field	Daily Max	9.0 su	2/Week	Grab	
pH Field	Daily Min	6.0 su	2/Week	Grab	
Temperature Maximum	Daily Max	86 deg F	Daily	Continuous	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Phosphorus, Total	Monthly Avg	0.5 mg/L	2/Week	24-Hr Flow Prop Comp	This is an interim MDV limit effective through March 31, 2023. See the MDV/Phosphorus subsections and phosphorus schedules of the permit.
Phosphorus, Total	Monthly Avg	0.4 mg/L	2/Week	24-Hr Flow Prop Comp	This is an interim MDV limit effective on April 1, 2023. See the MDV/Phosphorus subsections and phosphorus schedules of 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.
Chloride	Daily Max	440 mg/L	2/Week	24-Hr Comp	
Chloride	Weekly Avg	400 mg/L	2/Week	24-Hr Comp	
Chloride	Monthly Avg	400 mg/L	2/Week	24-Hr Comp	
Chloride	Weekly Avg	3,281 lbs/day	2/Week	Calculated	
Nitrogen, Ammonia (NH3-N) Total		mg/L	2/Week	24-Hr Comp	
Nitrogen, Total Kjeldahl		mg/L	Quarterly	24-Hr Flow Prop Comp	
Nitrogen, Nitrite + Nitrate Total		mg/L	Quarterly	24-Hr Flow Prop Comp	
Nitrogen, Total		mg/L	Quarterly	Calculated	Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					Nitrogen.
Nickel, Total Recoverable		mg/L	Monthly	24-Hr Comp	Monitoring only during April 1, 2024 to March 31, 2025.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	
Chronic WET	Monthly Avg	1.0 TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	

Changes from Previous Permit:

- The permittee has applied for a multi-discharger variance (MDV) for Phosphorus for this permit term and the application has been approved by the Department. An MDV interim limit of 0.4 mg/L has been added that goes into effect per a compliance schedule. The permittee is now required to report the total amount of phosphorus discharged in lbs/month and lbs/year. By March 1 of each year the permittee shall make a payment(s) to participating county(s) of \$54.99 per pound of phosphorus discharged during the previous year in excess of the target value of 0.2 mg/L.
- Addition of quarterly monitoring for Total Nitrogen (TKN, N02+N03 and Total N) as recommended in the Department's October 1, 2019 Guidance for Total Nitrogen Monitoring in Wastewater Permits.
- Addition of daily max and monthly avg limits for Chloride to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7).
- Addition of Nickel monitoring in the 4th year of the permit so that more representative data can be collected and compared to the calculated weekly average limit.
- Updated Acute and Chronic WET testing frequencies and addition of a Chronic WET monthly avg limit. WET limits must be given, according to s. NR 106.08(6), Wis. Adm. Code, whenever the applicable Reasonable Potential equation results in a value greater than 1.0.
- Inactivated Sample Points 601 and 602 and removed additional temperature monitoring requirements following the installation of cooling towers to meet the daily max effluent temperature limit of 86 deg F at Outfall 009.

Explanation of Limits and Monitoring Requirements

Water Quality-Based Limits and WET Requirements

Refer to the WQBEL memo for the detailed calculations, prepared by the Water Quality Bureau dated January 19, 2021 used for this reissuance.

Phosphorus – Phosphorus rules became effective December 1, 2010 per ch., NR 217, Wis. Adm. Code, that required the permittee to comply with water quality-based effluent limits (WQBELs) for total phosphorous. The final phosphorus WQBELs are 0.225 mg/L expressed as a monthly average and 0.075 mg/L & 0.64 lbs/day both expressed as a 6-month average (May-October & November-April) and were to become effective as scheduled unless a variance was granted. For this permit term, the permittee has applied for the Multi-Discharger Variance (MDV) for phosphorus as provided for in s. 283.16, Wis. Stats., and approved by USEPA on February 6, 2017 until February 5, 2027. 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.

Conditions of the MDV require the permittee to optimize phosphorus removal throughout the proposed 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. 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 (agricultural and urban) phosphorus control strategies at the watershed level.

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. Quarterly effluent monitoring for Total Nitrogen is included in the permit because of the potential for higher nitrogen loading resulting from higher flows (major facilities), higher concentrations, or both. 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.

Whole Effluent Toxicity – Whole effluent toxicity (WET) testing requirements and limits 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>). See the permit for WET requirements and WET testing dates.

Thermal – Requirements for Temperature are included in NR 102 Subchapter II Water Quality Standards for Temperature and NR 106 Subchapter V Effluent Limitations for Temperature. Thermal discharges must meet the Public Health criterion of 120 degrees F and the Fish & Aquatic Life criteria which are established to protect aquatic communities from lethal and sub-lethal thermal effects. Additionally, per NR 106, the daily maximum effluent temperature to a LAL stream is 86 degrees F year-round.

Chloride – Acute and chronic chloride toxicity criteria for the protection of aquatic life are included in Tables 1 and 5 of ch. NR 105, Wis. Adm. Code. Subchapter VII of ch. NR 106 establishes the procedure for calculating water quality-based effluent limitations (WQBELs) for chloride. If the permittee's effluent data shows that a calculated WQBEL for chloride cannot be met, then the permit will include a chloride effluent limitation.

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.

Industrial Effluent Limits – There has been a change in the expression of limits per the 2016 revisions to NR 205.065. In accordance with the federal regulation 40 CFR 122.45(d), limits in this permit are to be expressed as daily maximum and monthly average limits whenever practicable. Minor changes have been made to the chloride limits.

Categorical Limits

Refer to the TBEL memo for the detailed calculations, prepared by the Water Quality Bureau dated December 18, 2020 used for this reissuance.

BOD₅ and TSS – The Department has determined that calculated limits are greater than the limits calculated in the previous permit. Without a demonstration of need for a higher limit in accordance with s. NR 207.04, Wis. Adm. Code, the current limits for BOD₅ and TSS have been continued in the proposed permit. The daily maximum and monthly average concentration limits in the WQBEL memo are also recommended to be included in the reissued permit along with the mass concentrations that are recommended in this TBEL memo.

Sample Point Number: 601- Sleepy Hollow and 602- Mouth at East Twin

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Temperature Maximum		deg F	Daily	Continuous	
Temperature Average		deg F	Daily	Continuous	

Changes from Previous Permit:

- No changes from the previous permit.

Explanation of Limits and Monitoring Requirements

Monitoring is continued in the proposed permit to obtain actual thermal data in the stream to compare with temperature criteria and verify cooling activity in the stream.

4 Land Application - Liquids and Sludge (industrial only)

Sample Point Number: 002- HIGH STRENGTH WASTEWATER and 005- UNTREATED PROCESS WASTEWATER

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Nitrogen, Total Kjeldahl		mg/L	Monthly	Grab	
Chloride		mg/L	Monthly	Grab	
Phosphorus, Total		mg/L	Quarterly	Grab	
Phosphorus, Water Extractable		% of Tot P	Quarterly	Grab	
Solids, Total		Percent	Annual	Grab	

Changes from Previous Permit:

- Addition of water extractable phosphorus monitoring to determine available phosphorus from measured total P.

Explanation of Limits and Monitoring Requirements

Requirements for land application of industrial liquids are determined in accordance with ch. NR 214, Wis. Adm. Code.

WATER EXTRACTABLE PHOSPHORUS

Water extractable phosphorus (WEP) is the coefficient for determining plant available phosphorus from measured total phosphorus. In Wisconsin, the Penn State Method is utilized and is expressed in percent. While a total P may be significant, the WEP may show that only a small percentage of the P is available to plants because of factors such as treatment processes and chemical addition that “tie-up” phosphorus limiting the amount of phosphorus that is plant

available. As part of the Wisconsin’s nutrient management plan (NMP) requirements, the accounting of all fertilizers must be included over the NMP cycle. The fertilizer value of the waste needs to be communicated to the farmer and accounted for in the NMP.

Sample Point Number: 004- WWTP BIOSOLIDS (SLUDGE)

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Solids, Total		Percent	Annual	Composite	Dry weight
Chloride		Percent	Annual	Composite	Dry weight
Nitrogen, Total Kjeldahl		Percent	Annual	Composite	Dry weight
Phosphorus, Total		Percent	Annual	Composite	Dry weight
Phosphorus, Water Extractable		% of Tot P	Annual	Composite	
Nitrogen, Ammonia (NH3-N) Total		Percent	Annual	Composite	Dry weight
Nitrogen, Organic Total		Percent	Annual	Composite	Dry weight
Potassium, Total Recoverable		Percent	Annual	Composite	Dry weight
pH Field		su	Annual	Composite	
Lead Dry Wt		mg/kg	Annual	Composite	
Zinc Dry Wt		mg/kg	Annual	Composite	
Copper Dry Wt		mg/kg	Annual	Composite	
Cadmium Dry Wt		mg/kg	Annual	Composite	
Nickel Dry Wt		mg/kg	Annual	Composite	

Changes from Previous Permit:

- Addition of water extractable phosphorus monitoring to determine available phosphorus from measured total P.

Explanation of Limits and Monitoring Requirements

Requirements for land application of industrial sludge are determined in accordance with ch. NR 214, Wis. Adm. Code.

WATER EXTRACTABLE PHOSPHORUS

Water extractable phosphorus (WEP) is the coefficient for determining plant available phosphorus from measured total phosphorus. In Wisconsin, the Penn State Method is utilized and is expressed in percent. While a total P may be significant, the WEP may show that only a small percentage of the P is available to plants because of factors such as treatment processes and chemical addition that “tie-up” phosphorus limiting the amount of phosphorus that is plant available. As part of the Wisconsin’s nutrient management plan (NMP) requirements, the accounting of all fertilizers must

be included over the NMP cycle. The fertilizer value of the waste needs to be communicated to the farmer and accounted for in the NMP.

5 Compliance Schedules

5.1 Phosphorus Schedule - Optimization Plan

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

Required Action	Due Date
Optimization Plan: The permittee shall prepare an Optimization Plan and submit it for Department approval. The plan shall include an evaluation of collected effluent data, possible source reduction measures and operational improvements to optimize performance to control phosphorus discharges. The plan shall contain a schedule for implementation of the measures and improvements. Once the plan is approved by the Department, the permittee shall take the steps called for in the Optimization Plan and follow the schedule of implementation as approved.	03/31/2022
Progress Report #1: Submit a progress report on optimizing removal of phosphorus.	03/31/2023
Progress Report #2: Submit a progress report on optimizing removal of phosphorus.	03/31/2024
Progress Report #3: Submit a progress report on optimizing removal of phosphorus.	03/31/2025
Progress Report #4: Submit a progress report on optimizing removal of phosphorus.	03/31/2026

5.2 Phosphorus Multi-Discharger Variance Interim Limit (0.4 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.	09/30/2021
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.	03/31/2022
Initiate Actions: Initiate actions identified in the plan.	09/30/2022
Complete Actions: Complete actions identified in the plan and achieve compliance with the specified interim effluent limit.	03/31/2023

5.3 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 (\$54.99 per pound)] or \$640,000, whichever is less. See the payment calculation steps in	03/01/2022

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.	
Annual Verification of Payment #2: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2023
Annual Verification of Payment #3: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2024
Annual Verification of Payment #4: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2025
Annual Verification of Payment #5: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2026
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.	

5.4 Land Application Management Plan

A management plan is required for the land application system.

Required Action	Due Date
Land Application Management Plan: Submit an update to the management plan to optimize the land application system performance and demonstrate compliance with Wisconsin Administrative Code NR 214.	03/31/2023

Explanation of Compliance Schedules

Optimization

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 prepare an optimization plan with a schedule for implementation and submit it for Department approval. The permittee shall take the steps called for in the optimization plan and submit annual progress reports on optimizing the removal of phosphorus.

Interim Limit

Subsection 283.16(6), Wis. Stats., establishes required interim phosphorus effluent limits that must be met for multi-discharger variance (MDV) eligibility. The schedule above provides the permittee with two years to comply with that limit.

County Payment

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 \$54.99 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).

Land Application Management Plan

A schedule for updating the land application management plan one time during the permit term has been added for consistency statewide and to improve management of the land application.

Attachments:

Substantial Compliance Determination, by Laura Gerold, Wastewater Engineer, dated January 23, 2021

Technology-Based Effluent Limitations for Agropur Inc Luxemburg WPDES Permit No. WI-0050037-09, by Nicole Krueger, Water Resources Engineer, dated December 18, 2020

Water Quality-Based Effluent Limitations for Agropur Inc Luxemburg WPDES Permit No. WI-0050037-09, by Nicole Krueger, Water Resources Engineer, dated January 19, 2021

Multi-Discharger Variance (MDV) Conditional Approval Letter, by Matt Claucherty, Water Resources Management Specialist, dated April 24, 2020

Multi-Discharger Variance (MDV) Application Evaluation Checklist, by Matt Claucherty, Water Resources Management Specialist, dated April 24, 2020

Proposed Expiration Date:

March 31, 2026

Justification of Any Waivers from Permit Application Requirements

No waivers from permit application requirements were granted.

Prepared By: Sarah Donoughe, Wastewater Specialist

Date: February 12, 2021