

Permit Fact Sheet

General Information

Permit Number	WI-0065510-03-0
Permittee Name and Address	Badger State Waste LLC 6588 County Road W, Allenton, WI 53002
Permitted Facility Name and Address	Badger State Waste LLC 6588 County Road W
Permit Term	August 01, 2026 to July 31, 2031
Discharge Location	Groundwaters of the State via Landspreading on Approved Sites primarily in Calumet, Dodge, Fond du Lac, Outagamie, Ozaukee, Sheboygan Washington, and Waukesha counties.

Facility Description

Badger State Waste LLC’s (BSW’s) headquarters are located in Allenton, Wisconsin (Washington County). This facility provides short term storage and land application of municipal sewage sludges for numerous municipalities. BSW uses this WPDES permit to directly land apply municipal sludges as well as land apply municipal sludges from storage. BSW proposes to store and mix Class B municipal sewage sludges, and therefore has been classified as a biosolids generator under s. NR 204.02(2), Wis. Adm. Code. Only sewage sludge identified in the permit application or subsequently approved through the procedures for new waste streams may be discharged either directly or through the storage system.

BSW currently has approval for 34 influent clients. These clients are stored in approved storage structures, mixed, and then land applied per ch. NR 204, Wis. Adm. Code requirements. BSW may receive approval of additional new clients throughout the term of the permit by providing the required information shown in Section 1.2 (New Waste Stream Requirements) of the WPDES permit. Upon approval of new clients, BSW will need to update the facility’s sludge management plan to reflect the addition of the new client(s).

BSW also has the ability to directly land apply Class B municipal sewage sludges (Outfalls 201 through 241) per s. NR 204.07 Wis. Adm. Code. Direct land application clients will not be considered confidential under BSW’s WPDES permit. BSW can request and receive approval for additional new direct-land application outfalls after the reissuance of the proposed permit. Upon approval of new direct land application outfalls, BSW will need to update the facility’s sludge management plan to reflect the addition of the new outfalls.

Additionally, BSW has the option to discharge stored sewage sludge to nearby wastewater treatment facilities. Once the sewage sludge is discharged to these facilities, BSW no longer is responsible for further treatment, land application, and/or disposal. BSW will be responsible for reporting total discharged gallons on the annual “Other Methods of Disposal or Distribution Report” (Form 3400-052).

Each site/field that is approved for land application must comply with s. NR 204.07, Wis. Adm. Code requirements. Land application fields receiving sewage sludge (storage and direct land application outfalls) must be approved by the department prior to use. Monitoring results and land application events are to be reported on the Characteristics Reports (Forms 3400-049) and Annual Land Application Report (Form 3400-055), respectively. See the permit for additional monitoring and reporting requirements.

Changes to tables in this fact sheet are identified in gray. The acronym “PH” means “placeholder” and “DLA” means “Direct Land Application”

Storage Structures

Badger State Waste currently utilizes four storage structures as described below.

Tank	Outfall	Tank Type	Waste Stored	Capacity	TRS	Q/Q	Township	2025 Amt Applied (MG)	Manure Stored?
Rate*	001	Steel Glass-Lined	Sewage Sludge	0.5 MG	11N 18E Section 3	NW/NE	Addison	0	No
Biese*	004	Steel Glass-Lined	Sewage Sludge	0.52 MG	18N 20E, Section 33	NW/NW	Clyman	0	No
Goeller #1	005	Concrete	Sewage Sludge	2 MG	11N 18E, Section 30	NW/NW	Addison	5.89	No
Goeller #2	006	Concrete	Sewage Sludge	6 MG	11N 18E, Section 33	NW/SE	Addison	9.16	No

*BSW has not stored waste in these structures during the past three calendar years.

Substantial Compliance Determination

Enforcement During Last Permit: After a desk top review of all discharge monitoring reports, land app reports, compliance schedule items, and a site visit on January 15, 2025, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Steve Warrner on 04/07/2026.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sampling Points

Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
701	Inflow to storage of liquid sewage sludge from Grafton WWTF (Liquid Sewage Sludge).
702	Inflow to storage of liquid sewage sludge from Hartford WWTF (Liquid Sewage Sludge).
703	Inflow to storage of liquid sewage sludge from Slinger WWTF (Liquid Sewage Sludge).
704	Inflow to storage of liquid sewage sludge from Mayville WWTF (Liquid Sewage Sludge).
705	Inflow to storage of liquid sewage sludge from Randolph WWTF (Liquid Sewage Sludge).
707	Inflow to storage of liquid sewage sludge from Kewaskum WWTF (Liquid Sewage Sludge).
708	Inflow to storage of liquid sewage sludge from West Bend WWTF (Liquid Sewage Sludge).
709	Inflow to storage of liquid sewage sludge from Ashippun WWTF (Liquid Sewage Sludge).
710	Inflow to storage of liquid sewage sludge from Jackson WWTF (Liquid Sewage Sludge).
711	Inflow to storage of liquid sewage sludge from Ripon WWTF (Liquid Sewage Sludge).
712	Inflow to storage of liquid sewage sludge from Port Washington WWTF (Liquid Sewage Sludge).

Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
	Sludge).
713	Inflow to storage of liquid sewage sludge from Cedarburg Waste Water Treatment Plant (Liquid Sewage Sludge).
714	Inflow to storage of liquid sewage sludge from Howards Grove Waste Water Treatment Facility (Liquid Sewage Sludge).
715	Inflow to storage of liquid sewage sludge from Cedar Grove WWTF (Liquid Sewage Sludge).
716	Inflow to storage of liquid sewage sludge from Poy Sippi Wastewater Treatment Facility (Liquid Sewage Sludge).
717	Inflow to storage of liquid sewage sludge from Seymour Wastewater Treatment Facility (Liquid Sewage Sludge).
718	Inflow to storage of liquid sewage sludge from Marshall Wastewater Treatment Facility (Liquid Sewage Sludge).
719	Inflow to storage of liquid sewage sludge from Manitowoc Wastewater Treatment Facility.
720	Inflow to storage of liquid sewage sludge from Sussex Wastewater Treatment Facility.
721	Inflow to storage of liquid sewage sludge from Fredonia Wastewater Treatment Facility.
722	Inflow to storage of liquid sewage sludge from Campbellsport Wastewater Treatment Facility (Liquid Sewage Sludge).
723	Inflow to storage of liquid sewage sludge from St. Nazianz Wastewater Treatment Facility (Liquid Sewage Sludge).
724	Inflow to storage of liquid sewage sludge from Oconomowoc Wastewater Treatment Facility (Liquid Sewage Sludge)
725	Inflow to storage of liquid sewage sludge from South Milwaukee Wastewater Treatment Facility (Liquid Sewage Sludge)
726	Inflow to storage of liquid sewage sludge from Newburg Wastewater Treatment Plant (Liquid Sewage Sludge)
727	Inflow to storage of liquid sewage sludge from Lakeland University (Liquid Sewage Sludge).
728	Inflow to storage of liquid sewage sludge from Brookfield WWTF (Liquid Sewage Sludge)
729	Inflow to storage of liquid sewage sludge from Waupaca WWTF (Liquid Sewage Sludge)
730	Inflow to storage of liquid sewage sludge from New London WWTF (Liquid Sewage Sludge)
731	Inflow to storage of liquid sewage sludge from Eden WWTF (Liquid Sewage Sludge)
732	Inflow to storage of liquid sewage sludge from Freedom Sanitary District (Liquid Sewage Sludge)
733	Inflow to storage of liquid sewage sludge from Jefferson WWTF (Liquid Sewage Sludge)

Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
734	Inflow to storage of liquid sewage sludge from Delafield Hartland WWTF (Liquid Sewage Sludge)

Changes from Previous Permit

1. Influent sample points 724 – 734 have been added since the last permit term.
2. Influent sample point 706 (Allenton) has been removed.
3. Section 1.2 (“New Waste Stream Requirements”) has been updated to include PFAS monitoring requirements for new sewage sludge clients.

Explanation of Changes

PFAS concentrations for new influent clients is now required to ensure that this facility is aware of PFAS concentrations in sewage sludge which is received. The list of PFAS compounds required to be sampled can be found in the land application section of the WPDES permit. This is driven by the sampling now required for the permitted outfalls. Sampling for existing clients is not a requirement but is encouraged.

1.2 New Waste Stream Requirements

Changes from Previous Permit

PFAS is now listed as a required parameter to be reported to the department for all new clients.

Explanation of Changes

PFAS concentrations for new influent clients is now required to ensure that this facility is aware of PFAS concentrations in sewage sludge which is received and then subsequently stored and/or land applied. The list of PFAS compounds required to be sampled can be found in the land application section of the WPDES permit. This is driven by the sampling now required for the permitted outfalls. Sampling for existing clients is not a requirement.

1.3 Sample Point Number: 701- Grafton WWTF; 702- Hartford WWTF; 703- Slinger WWTF; 704- Mayville WWTF; 705- Randolph WWTF; 707- Kewaskum WWTF; 708- West Bend WWTF; 709- Ashippun WWTF; 710- Jackson WWTF; 711- Ripon WWTF; 712- Port Washington; 713- Cedarburg; 714- Howards Grove; 715- Cedar Grove WWTF; 716- Poy Sippi WWTF; 717- Seymour WWTF; 718- Marshall WWTF; 719- Manitowoc WWTF; 720- Sussex WWTF; 721- Fredonia WWTF; 722- Campbellsport WWTF; 723- St. Nazianz WWTF; 724- Oconomowoc WWTF; 725- South Milwaukee WWTF; 726- Newburg WWTP; 727- Lakeland University; 728- Brookfield WWTF; 729- Waupaca WWTF; 730-New London WWTF; 731-Eden WWTF; 732-Freedom Sanitary District; 733-Jefferson WWTF, and 734-Delafield Hartland WWTF

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Sewage Liquid Sludge		gal/month	Monthly	Estimated	

1.3.1 Changes from Previous Permit:

When reporting data on the monitoring report form, the volume received from a client (i.e., the ‘flow rate’) will now be reported as ‘Sewage Liquid Sludge’.

1.3.2 Explanation of Limits and Monitoring Requirements

The parameter ‘flow rate’ was changed to ‘sewage liquid sludge’ to enable waste classifications within the department’s database in case this permittee ever accepts different waste types.

2 Land Application

2.1 Sampling Points

Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
001	Land application of mixed liquid sewage sludges from the 500,000 gallon steel, glass-lined Marvin Rate Storage Tank. Representative sampling location is detailed in the land management plan. Location: 11N, 18E, Section 3, NW 1/4, NE 1/4 (Liquid Sewage Sludge).
004	Land application of mixed liquid sewage sludges from the 520,000 gallon steel, glass-lined Martin Biese Storage Tank. Representative sampling location is detailed in the land management plan. Location: 18N, 20E, Section 33, NW 1/4, NW 1/4 (Liquid Sewage Sludge).
005	Land application of mixed liquid sewage sludges from the 2-million gallon concrete Greg Goeller Storage Tank #1. Representative sampling location is detailed in the land management plan. Location: 11N, 18E, Section 33, SE 1/4, NW 1/4 (Liquid Sewage Sludge).
006	Land application of mixed liquid sewage sludges from the 6-million gallon concrete Greg Goeller Tank #2. Representative sampling location is detailed in the land management plan. Location: 11N, 18E, Section 33, NW 1/4, SE 1/4 (Liquid Sewage Sludge).
201	Direct land application of liquid sewage sludge from Grafton WWTF (Liquid Sewage Sludge).
202	Direct land application of liquid sewage sludge from Hartford WWTF (Liquid Sewage Sludge).
203	Direct land application of liquid sewage sludge from Slinger WWTF (Liquid Sewage Sludge).

Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
204	Direct land application of liquid sewage sludge from Mayville WWTF (Liquid Sewage Sludge).
205	Direct land application of liquid sewage sludge from Randolph WWTF (Liquid Sewage Sludge).
207	Direct land application of liquid sewage sludge from Kewaskum WWTF (Liquid Sewage Sludge).
208	Direct land application of liquid sewage sludge from West Bend WWTF (Liquid Sewage Sludge).
209	Direct land application of liquid sewage sludge from Ashippun WWTF (Liquid Sewage Sludge).
210	Direct land application of liquid sewage sludge from Jackson WWTF (Liquid Sewage Sludge).
211	Direct land application of liquid sewage sludge from Oconomowoc WWTF (Liquid Sewage Sludge).
212	Direct land application of liquid sewage sludge from Lodi WWTF (Liquid Sewage Sludge).
213	Direct land application of liquid sewage sludge from Port Washington WWTF (Liquid Sewage Sludge).
214	Direct land application of liquid sewage sludge from Howards Grove WWTF (Liquid Sewage Sludge).
215	Direct land application of liquid sewage sludge from Sussex WWTF (Liquid Sewage Sludge).
216	Direct land application of liquid sewage sludge from Fredonia WWTF (Liquid Sewage Sludge).
218	Direct land application of liquid sewage sludge from Waupaca WWTF (Liquid Sewage Sludge).
219	Direct land application of liquid sewage sludge from Campbellsport WWTF (Liquid Sewage Sludge).
220	Direct land application of liquid sewage sludge from Freedom WWTF (Liquid Sewage Sludge).
221	Direct land application of liquid sewage sludge from Village of Black Creek WWTF (Liquid Sewage Sludge).
222	Direct land application of liquid sewage sludge from Clintonville WWTF (Liquid Sewage Sludge).
223	Direct land application of liquid sewage sludge from Denmark WWTF (Liquid Sewage Sludge).
224	Direct land application of liquid sewage sludge from Seymour WWTP (Liquid Sewage Sludge).

Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
225	Direct land application of liquid sewage sludge from Ripon WWTF (Liquid Sewage Sludge).
226	Direct land application of liquid sewage sludge from Hortonville WWTF Liquid Sewage Sludge).
227	Direct land application of liquid sewage sludge from Tigerton WWTF (Liquid Sewage Sludge).
228	Direct land application of liquid sewage sludge from Red Granite WWTF (Liquid Sewage Sludge).
229	Direct land application of liquid sewage sludge from Marshall WWTF (Liquid Sewage Sludge).
230	Direct land application of liquid sewage sludge from Manitowoc WWTF (Liquid Sewage Sludge).
231	Direct land application of liquid sewage sludge from Cedarburg WWTF (Liquid Sewage Sludge).
232	Direct land application of liquid sewage sludge from St. Nazianz WWTF (Liquid Sewage Sludge).
233	Direct land application of liquid sewage sludge from Nichols WWTF (Liquid Sewage Sludge).
234	Direct land application of liquid sewage sludge from South Milwaukee WWTF (Liquid Sewage Sludge).
235	Direct land application of liquid sewage sludge from Newburg Wastewater Treatment Plant (Liquid Sewage Sludge).
236	Direct land application of liquid sewage sludge from Lakeland University (Liquid Sewage Sludge).
237	Direct land application of liquid sewage sludge from Brookfield WWTF (Liquid Sewage Sludge).
238	Direct land application of liquid sewage sludge from New London WWTF (Liquid Sewage Sludge).
239	Direct land application of liquid sewage sludge from Eden WWTF (Liquid Sewage Sludge).
240	Direct land application of liquid sewage sludge from Jefferson WWTF (Liquid Sewage Sludge).
241	Direct land application of liquid sewage sludge from Delafield Hartland WWTF (Liquid Sewage Sludge).

Changes from Previous Permit

Outfalls 233 – 241 have been added since the last permit reissuance.

Explanation of Changes

Outfalls 233 – 241 have been added as they were approved outfalls during the term of this permit. It is worth noting that any future approved storage structures not identified at permit reissuance time will need a permit modification to incorporate requirements into the WPDES permit.

2.2 Monitoring Requirements and Limitations

2.2.1 Sample Point Number: 001- PH: Rate Tank; 004- PH: Biese Tank; 005- Goeller Pit #1; 006- Goeller Pit #2

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		gal/month	Monthly	Estimated	Liquid Sewage Sludge (with Radium) regulated per ch. NR 204, Wis. Adm. Code
Solids, Total		Percent	Monthly	Composite	
Nitrogen, Total Kjeldahl		Percent	Monthly	Composite	
Nitrogen, Ammonia (NH3-N) Total		Percent	Monthly	Composite	
Phosphorus, Total		Percent	Monthly	Composite	
Phosphorus, Water Extractable		% of Tot P	Quarterly	Composite	
Potassium, Total Recoverable		Percent	Monthly	Composite	
pH Field		su	Monthly	Grab	
Arsenic Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Quarterly	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Quarterly	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Quarterly	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Quarterly	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Quarterly	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Quarterly	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Quarterly	Composite	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Molybdenum Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Quarterly	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Quarterly	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
Fecal Coliform	Geometric Mean - Monthly	2,000,000 MPN/g TS	Annual	Grab	
Radium 226 Dry Wt		pCi/g	Annual	Composite	
PFOA + PFOS		ug/kg	Annual	Calculated	
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

Changes from Previous Permit:

1. The ‘Sample Type’ for Fecal Coliform and pH has been changed from ‘Composite’ to ‘Grab’.
2. The ‘Sample Frequency’ for Fecal Coliform has been changed from ‘Quarterly’ to ‘Annual’.
3. PFAS –Monitoring is required annually/once pursuant to s. NR 204.06(2)(b)9., Wis. Adm. Code.

Explanation of Limits and Monitoring Requirements

The sample type for fecal coliform and pH is now grab to ensure the sampling results are representative of the characteristics of the waste. Compositing a sample can affect the pH and fecal coliform results, so it is best practice to take grab samples when sampling for these parameters. It is important to note that the fecal coliform results are reported as the geometric mean of 7 distinct grab sample results.

Fecal coliform monitoring frequency has been reduced from Quarterly to Annual to align this permit’s requirements with those of other similar haulers.

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 has developed a draft risk assessment to determine future land application rates and released this risk assessment in January of

2025. The department is evaluating this new information. Until a decision is made, the “Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS” should be followed

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.

2.2.2 Sample Point Number: 201- DLA: Grafton WWTF; 202- DLA: Hartford WWTF; 203- DLA: Slinger WWTF; 204- DLA: Mayville WWTF; 205- DLA: Randolph WWTF; 207- DLA: Kewaskum WWTF; 208- DLA: West Bend WWTF; 210- DLA: Jackson WWTF; 211- DLA: Oconomowoc WWTF; 212- DLA: Lodi WWTF; 213- DLA: Port Washington WWTF; 214- DLA: Howards Grove WWTF; 216- DLA: Fredonia WWTF; 218- DLA: Waupaca WWTF; 220- DLA: Freedom WWTF; 222- DLA: Clintonville WWTF; 223- DLA: Denmark WWTF; 226- DLA: Hortonville WWTF; 227- DLA: Tigerton WWTF, 232- DLA: St. Nazianz WWTF; Sample Point Number: 228- DLA: Red Granite WWTF; 229- DLA: Marshall WWTF; 230- DLA: Manitowoc WWTF; 231- DLA: Cedarburg WWTF; 233- DLA: Nichols WWTF; 234- DLA: South Milwaukee WWTF; 235- DLA: Newburg WWTP; 236- DLA: Lakeland University, and 237- DLA: Brookfield WWTF

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		gal/month	Monthly	Estimated	Liquid Sewage Sludge regulated per ch. NR 204, Wis. Adm. Code
Solids, Total		Percent	Quarterly	Composite	
Nitrogen, Total Kjeldahl		Percent	Quarterly	Composite	
Nitrogen, Ammonia (NH3-N) Total		Percent	Quarterly	Composite	
Phosphorus, Total		Percent	Quarterly	Composite	
Phosphorus, Water Extractable		% of Tot P	Quarterly	Composite	
Potassium, Total Recoverable		Percent	Quarterly	Composite	
pH Field		su	Quarterly	Grab	
Arsenic Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Quarterly	Composite	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Cadmium Dry Wt	High Quality	39 mg/kg	Quarterly	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Quarterly	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Quarterly	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Quarterly	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Quarterly	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Quarterly	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Quarterly	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Quarterly	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Quarterly	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
Fecal Coliform	Geometric Mean - Monthly	2,000,000 MPN/g TS	Annual	Grab	

Changes from Previous Permit:

1. The ‘Sample Type’ for Fecal Coliform and pH has been changed from ‘Composite’ to ‘Grab’.
2. The ‘Sample Frequency’ for Fecal Coliform has been changed from ‘Quarterly’ to ‘Annual’.

Explanation of Limits and Monitoring Requirements

The sample type for fecal coliform and pH is now grab to ensure the sampling results are representative of the characteristics of the waste. Compositing a sample can affect the pH and fecal coliform results, so it is best practice to take grab samples when sampling for these parameters. It is important to note that the fecal coliform results are reported as the geometric mean of 7 distinct grab sample results.

Fecal coliform monitoring frequency has been reduced from Quarterly to Annual to align this permit’s requirements with those of other similar haulers.

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.

2.2.3 Sample Point Number: 209- DLA: Ashippun WWTF; 215- DLA: Sussex WWTF; 219- DLA: Campbellsport WWTF; 221- DLA: Black Creek WWTF; 224- DLA: Seymour WWTF, and 225- DLA: Ripon WWTF

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		gal/month	Monthly	Estimated	Liquid Sewage Sludge (with Radium) regulated per ch. NR 204, Wis. Adm. Code
Solids, Total		Percent	Quarterly	Composite	
Nitrogen, Total Kjeldahl		Percent	Quarterly	Composite	
Nitrogen, Ammonia (NH ₃ -N) Total		Percent	Quarterly	Composite	
Phosphorus, Total		Percent	Quarterly	Composite	
Phosphorus, Water Extractable		% of Tot P	Quarterly	Composite	
Potassium, Total Recoverable		Percent	Quarterly	Composite	
pH Field		su	Quarterly	Grab	
Arsenic Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Quarterly	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Quarterly	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Quarterly	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Quarterly	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Quarterly	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Quarterly	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Quarterly	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Quarterly	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Quarterly	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
Fecal Coliform	Geometric Mean - Monthly	2,000,000 MPN/g TS	Annual	Grab	
Radium 226 Dry Wt		pCi/g	Annual	Composite	

Changes from Previous Permit:

1. The 'Sample Type' for Fecal Coliform and pH has been changed from 'Composite' to 'Grab'.
2. The 'Sample Frequency' for Fecal Coliform has been changed from 'Quarterly' to 'Annual'.

Explanation of Limits and Monitoring Requirements

The sample type for fecal coliform and pH is now grab to ensure the sampling results are representative of the characteristics of the waste. Compositing a sample can affect the pH and fecal coliform results, so it is best practice to take grab samples when sampling for these parameters. It is important to note that the fecal coliform results are reported as the geometric mean of 7 distinct grab sample results.

Fecal coliform monitoring frequency has been reduced from Quarterly to Annual to align this permit's requirements with those of other similar haulers.

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.

3 Schedules

3.1 Sludge Management Plan

A management plan is required for the land treatment system.

Required Action	Due Date
Sludge Management Plan Update: Submit an update to the management plan to optimize the land treatment system performance and demonstrate compliance with ch. NR 204, Wis. Adm. Code. The land treatment system shall be operated in accordance with the approved management plan. Specifically, this plan shall include updated department notification procedures regarding upcoming land application events and updated procedures to ensure timely submittal of reports.	10/31/2026
Ongoing Management Plan Updates: Updates are to be submitted and approved by the department when changes are made in sludge management practices. All updates should contain the latest colored aerial photos available.	

Explanation of Schedule

Land Application Management Plan (municipal)- An up-to-date Sludge Management Plan is required that documents how the permittee will manage the land application of biosolids consistent with ch. NR 204, Wis. Adm. Code. The items identified in the 09/30/2026 plan update were raised during the most recent in-person inspection at this facility.

3.2 Tank Inspection Reports for Rate and Biese Tanks (Outfalls 001 and 004)

Prior to putting the Rate and Biese tanks back in operation, a professional evaluation will be required.

Required Action	Due Date
<p>Tank Inspection Reports for Rate and Biese Tanks: Within two years of the effective date of this permit, the permittee shall submit to the department an inspection report by a qualified individual assessing the structural integrity of the Rate and Biese Tanks (Outfalls 001 and 004). This report shall include images of the structure(s), along with repair recommendations (if necessary). This is to ensure the tanks continue to be appropriate for the storage of sewage sludge. The tanks shall be completely emptied of all contents prior to the inspection. The permittee shall also make any suggested repairs indicated in the inspection report prior to putting the tanks back in service.</p>	<p>07/31/2028</p>

3.2.1 Explanation of Schedule

Due to concerns associated with the structural integrity of these storage tanks, an inspection and (potentially) repairs are required.

Prepared By:

Nate Willis
 Wastewater Section Manager

Date: 05/15/2026