

Permit Fact Sheet

General Information

Permit Number	WI-0051527-11-0
Permittee Name and Address	Brakebush Brothers Inc N4993 6TH DRIVE, WESTFIELD, WI 53964-9511
Permitted Facility Name and Address	Brakebush Brothers Inc N4993 6th Drive, Westfield
Permit Term	October 01, 2026 to September 30, 2031
Plant Classification	Basic; A1 – Suspended Growth Process, A4 – Ponds, Lagoons, and Natural Systems, B – Solids Separation, C – Biological Solids/Sludges
Discharge Location	Spray irrigation and land application in Marquette County
Receiving Water	Groundwater of Buffalo & Puckaway Lakes watershed in Buffalo and Puckaway Lakes Watershed of Upper Fox River Basin in Marquette County

Facility Description

This facility receives frozen slaughtered chickens which they further process through various cutting, battering, packaging, breeding, cooking and freezing operations. Process and cleaning wastewater is directed to a treatment system consisting of screening, primary settling, flow equalization, chemical addition/flocculation, dissolved air flotation, nutrient selection, activated sludge (lagoon), final clarification, lagoon effluent storage and ultimately, spray irrigation to seven separate spray irrigation fields. A system of groundwater monitoring wells are in place to monitor groundwater quality in the spray irrigation field management zones. Solids generated by the treatment system are typically dewatered by screw press and hauled to another WPDES permitted hauler for land disposal.

Substantial Compliance Determination

After a desktop review of all discharge monitoring reports, land application reports, compliance schedule items, and a site visit on February 11, 2026, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Jordan Main, Wastewater Engineer on July 30, 2026.

Sample Point Descriptions

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
105	0.40 MGD (2025)	IN PLANT: Representative grab samples of influent wastewater shall be obtained after the dissolved air flotation unit prior to the aeration lagoon.
205	0.37 MGD (2025)	IN PLANT: Representative grab samples of treated wastewater shall be obtained after the final clarifier prior to pumping to the effluent storage lagoons.
011	0.47 MGD (2025)	LAND TREATMENT: Field One - 35.2 acre spray irrigation field. Discharge is restricted to May through October. Representative

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
		samples of land treatment effluent from the storage lagoons to the spray irrigation field are obtained from the pump directing discharge to Field One.
013	0.68 MGD (2025)	LAND TREATMENT: Field Three - 53.2 acre spray irrigation field. Discharge is restricted to May through October. Representative samples of land treatment effluent from the storage lagoons to the spray irrigation field are obtained from the pump directing discharge to Field Three.
014	0.37 MGD (2025)	LAND TREATMENT: Field Four - 25.3 acre spray irrigation field. Discharge is restricted to May through October. Representative samples of land treatment effluent from the storage lagoons to the spray irrigation field is obtained from the pump directing discharge to Field Four.
015	0.44 MGD (2025)	LAND TREATMENT: Field Five - 29.1 acre spray irrigation field. Discharge is restricted to May through October. Representative samples of land treatment effluent from the storage lagoons to the spray irrigation field are obtained from the pump directing discharge to Field Five. Flow is metered by a totalizer.
016	0.41 MGD (2025)	LAND TREATMENT: Field Six - 32.8 acre spray irrigation field. Discharge is restricted to May through October. Representative samples of land treatment effluent from the storage lagoons to the spray irrigation field are obtained from the pump directing discharge to Field Six.
017	1.05 MGD (2025)	LAND TREATMENT: Field Seven - 71.46 acre spray irrigation field. Discharge is restricted to May through October. Representative samples of land treatment effluent from the storage lagoons to the spray irrigation field are obtained from the pump directing discharge to Field Seven.
018	0.49 MGD (2025)	LAND TREATMENT: Field Eight - 36.79 acre spray irrigation field. Discharge is restricted to May through October. Representative samples of land treatment effluent from the storage lagoons to the spray irrigation field are obtained from the pump directing discharge to Field Eight.
006	4.992 tons (2025)	LAND APPLICATION: Dewatered industrial sludge from the primary clarifier, DAF, and final clarifier combined. Representative samples of sludge shall be obtained from the sludge storage dumpster.

Sample Point Designation For Groundwater Monitoring Systems

System	Sample Pt Number	Well Name	Comments
Spray Field 1	822	MW-122 (822)	Down-gradient, Non-Point of Standard
	824	MW-124 (824)	Down-gradient, Non-Point of Standard
Spray Field 3	826	MW-126 (826)	Down-gradient, Non-Point of Standard
	827	MW-127 (827)	Down-gradient, Non-Point of Standard
	840	MW-136 (840)	Down-gradient, Non-Point of Standard
	841	MW-136P (841)	Down-gradient, Non-Point of Standard
Spray Field 4	806	MW-106 (806)	Down-gradient, Non-Point of Standard
	828	MW-128 (828)	Down-gradient, Non-Point of Standard
	829	MW-129 (829)	Down-gradient, Non-Point of Standard
Spray Field 5	830	MW-130 (830)	Down-gradient, Non-Point of Standard
	831	MW-131 (831)	Down-gradient, Non-Point of Standard
Spray Field 6	834	MW-134 (834)	Up-gradient, Background
Spray Field 7	844	MW-138 (844)	Down-gradient, Non-Point of Standard
Spray Field 8	845	MW-139 (845)	Down-gradient, Non-Point of Standard

Permit Requirements

1 In Plant - Monitoring and Limitations

1.1 Sample Point Number: 105- PROC WW POST DAF TRTMNT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Total Daily	
BOD5, Total		mg/L	Weekly	Grab	
Suspended Solids, Total		mg/L	Weekly	Grab	
Nitrogen, Total Kjeldahl		mg/L	Weekly	Grab	
Oil & Grease (Hexane)		mg/L	Weekly	Grab	

1.1.1 Changes from Previous Permit:

In-plant limitations and monitoring requirements were evaluated for this permit term and the following changes were made:

Sample Type - Changed from “Composite” to “Grab”. A single grab sample was determined to be sufficient to characterize influent.

1.2 Sample Point Number: 205- PROC WW POST ACT SLDG & CLAR

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Total Daily	
BOD5, Total	Daily Max	100 mg/L	Weekly	Grab	
Suspended Solids, Total		mg/L	Weekly	Grab	
Nitrogen, Total Kjeldahl		mg/L	Weekly	Grab	
Nitrogen, Nitrite + Nitrate (as N) Dissolved		mg/L	Weekly	Grab	
Oil & Grease (Hexane)		mg/L	Weekly	Grab	
Dissolved Oxygen		mg/L	Weekly	Grab	
Chloride		mg/L	Weekly	Grab	

1.2.1 Changes from Previous Permit:

In-plant limitations and monitoring requirements were evaluated for this permit term and no changes were required in this permit section.

2 Land Treatment – Monitoring and Limitations

2.1 Sample Point Number: 011- SI Field 1 - 35.2 acres; 013- SI Field 3 - 53.2 acres; 014- SI Field 4 - 25.3 acres; 015- SI Field 5 - 29.1 acres; 016- SI Field 6 - 32.8 acres; 017- SI Field 7 - 71.46 acres, and 018- SI Field 8 - 36.79 acres

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Total Daily	
Hydraulic Application Rate	Monthly Avg - LT	7,500 gal/ac/day	Monthly	Calculated	May - October.
Hydraulic Application Rate	Monthly Avg - LT	0 gal/ac/day	Monthly	Calculated	November - April.

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Nitrogen, Nitrite + Nitrate (as N) Dissolved		mg/L	2/Month	Grab	
Nitrogen, Total Kjeldahl		mg/L	2/Month	Grab	
Chloride	Annual Avg	250 mg/L	2/Month	Grab	
Chloride		lbs/yr	Annual	Calculated	
Nitrogen, Ammonia (NH ₃ -N) Total		mg/L	2/Month	Grab	
Nitrogen, Total		mg/L	2/Month	Calculated	Total nitrogen (mg/L) = total Kjeldahl nitrogen (mg/L) + [NO ₂ + NO ₃] nitrogen (mg/L)
Nitrogen, Max Applied On Any Zone		lbs/ac/yr	Annual	Calculated	Use the total nitrogen concentration when calculating the annual total. See the Maximum Applied Nitrogen/Chloride On Any Zone permit section.
Soil - Nitrogen, Available		mg/kg	Annual	Grab	
Soil - Phosphorus, Available		mg/kg	Annual	Grab	
Soil - Potassium, Available		mg/kg	Annual	Grab	
Soil - pH Lab		su	Annual	Grab	
Other Sources of Nitrogen		lbs/ac/yr	Annual	Measure	

2.1.1 Changes from Previous Permit:

Effluent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

- **Hydraulic Application Rate:** Limits added.
- **Nitrogen Ammonia:** Monitoring added.
- **Nitrogen, Total:** Monitoring added.
- **Nitrogen, Max Applied to Any Zone:** Monitoring added.

- **Soil, Nitrogen Available; Soil, Phosphorus Available; Soil, Potassium Available; Soil; pH Lab; Fertilizer Used:** Parameters added to monitoring requirements table.

2.1.2 Explanation of Limits and Monitoring Requirements

All requirements for land treatment of industrial wastewater are determined in accordance with ch. NR 214, Wis. Adm. Code. All categorical limits are based on ch. NR 214 Subchapter II (14), Wis. Adm. Code. More information on the limitations can be found in the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

Hydraulic Application Rate – Limits were added to the permit; one for the spray season (May – October) and a zero limit for the off season (November – April) per s. NE 214.14(3)(g), Wis. Adm. Code.

Nitrogen, Ammonia – Sampling was added to the permit to aid the Department in addressing the PAL exceedances of nitrite + nitrate in many of the down-gradient groundwater monitoring wells.

Nitrogen, Max Applied to Any Zone – This parameter has been added to the monitoring requirements table based on the need to report the total nitrogen mass loadings for the spray season. This requirement was previously found in the annual report.

Soil Sampling Parameters – Reporting of soil sampling parameters has been added to the permit instead of the annual report as required by s. NR 214.14(5)(c), Wis. Adm. Code.

3 Groundwater – Monitoring and Limitations

3.1 Groundwater Monitoring System for Spray Field 1

Location of Monitoring system: SWQ, Sec 36, Tn of Westfield, Marquette County

Groundwater Monitoring Well(s) to be Sampled: MW-122 (822), MW-124 (824)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-134 (834)

Groundwater Monitoring Well(s) Used for Point of Standards Application: Within this system there are no wells that fit this standard.

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	1/ 6 Months
Groundwater Elevation	feet MSL	N/A	N/A	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	1/ 6 Months
Nitrogen, Total Kjeldahl Dissolved	mg/L	N/A	N/A	1/ 6 Months
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	1/ 6 Months
Nitrogen, Organic Dissolved	mg/L	2.1	N/A	1/ 6 Months
Chloride Dissolved	mg/L	125	250	1/ 6 Months
Solids, Total Dissolved	mg/L	380	N/A	1/ 6 Months

3.1.1 Changes from Previous Permit:

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Nitrogen, Nitrite + Nitrate: Changes to the PAL.

3.1.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

3.2 Groundwater Monitoring System for Spray Field 3

Location of Monitoring system: NWQ, Sec 2, Tn of Oxford, Marquette County

Groundwater Monitoring Well(s) to be Sampled: MW-126 (826), MW-127 (827), MW-136 (840), MW-136P (841)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-134 (834)

Groundwater Monitoring Well(s) Used for Point of Standards Application: MW-136P (841), MW-136 (840)

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	1/ 6 Months
Groundwater Elevation	feet MSL	N/A	N/A	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	1/ 6 Months
Nitrogen, Total Kjeldahl Dissolved	mg/L	N/A	N/A	1/ 6 Months
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	1/ 6 Months
Nitrogen, Organic Dissolved	mg/L	2.1	N/A	1/ 6 Months
Chloride Dissolved	mg/L	125	250	1/ 6 Months
Solids, Total Dissolved	mg/L	380	N/A	1/ 6 Months

3.2.1 Changes from Previous Permit:

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Nitrogen, Nitrite + Nitrate: Changes to the PAL.

3.2.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

3.3 Groundwater Monitoring System for Spray Field 4

Location of Monitoring system: NEQ, Sec 1, Tn of Oxford, Marquette County

Groundwater Monitoring Well(s) to be Sampled: MW-106 (806), MW-129 (829), MW-128 (828)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-134 (834)

Groundwater Monitoring Well(s) Used for Point of Standards Application: Within this system there are no wells that fit this standard.

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	1/ 6 Months
Groundwater Elevation	feet MSL	N/A	N/A	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	1/ 6 Months
Nitrogen, Total Kjeldahl Dissolved	mg/L	N/A	N/A	1/ 6 Months
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	1/ 6 Months
Nitrogen, Organic Dissolved	mg/L	2.1	N/A	1/ 6 Months
Chloride Dissolved	mg/L	125	250	1/ 6 Months
Solids, Total Dissolved	mg/L	380	N/A	1/ 6 Months

3.3.1 Changes from Previous Permit:

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Nitrogen, Nitrite + Nitrate: Changes to the PAL.

3.3.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

3.4 Groundwater Monitoring System for Spray Field 5

Location of Monitoring system: SEQ, Sec 1, Tn of Oxford, Marquette County

Groundwater Monitoring Well(s) to be Sampled: MW-130 (830), MW-131 (831)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-134 (834)

Groundwater Monitoring Well(s) Used for Point of Standards Application: Within this system there are no wells that fit this standard.

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	1/ 6 Months
Groundwater Elevation	feet MSL	N/A	N/A	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	3.5	10	1/ 6 Months
Nitrogen, Total Kjeldahl Dissolved	mg/L	N/A	N/A	1/ 6 Months
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	1/ 6 Months
Nitrogen, Organic Dissolved	mg/L	2.1	N/A	1/ 6 Months
Chloride Dissolved	mg/L	125	250	1/ 6 Months
Solids, Total Dissolved	mg/L	380	N/A	1/ 6 Months

3.4.1 Changes from Previous Permit:

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Nitrogen, Nitrite + Nitrate: Changes to the PAL.

3.4.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

3.5 Groundwater Monitoring System for Spray Field 6

Location of Monitoring system: SWQ, Sec 35, Tn of Westfield, Marquette County

Groundwater Monitoring Well(s) to be Sampled: MW-134 (834)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-134 (834)

Groundwater Monitoring Well(s) Used for Point of Standards Application: Within this system there are no wells that fit this standard.

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	1/ 6 Months
Groundwater Elevation	feet MSL	N/A	N/A	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	1/ 6 Months
Nitrogen, Total Kjeldahl Dissolved	mg/L	N/A	N/A	1/ 6 Months
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	1/ 6 Months
Nitrogen, Organic Dissolved	mg/L	2.1	N/A	1/ 6 Months
Chloride Dissolved	mg/L	125	250	1/ 6 Months
Solids, Total Dissolved	mg/L	380	N/A	1/ 6 Months

3.5.1 Changes from Previous Permit:

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Nitrogen, Nitrite + Nitrate: Changes to the PAL.

3.5.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

3.6 Groundwater Monitoring System for Spray Field 7

Location of Monitoring system: NEQ, Sec 2, Tn of Westfield, Marquette County

Groundwater Monitoring Well(s) to be Sampled: MW-138 (844)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-134 (834)

Groundwater Monitoring Well(s) Used for Point of Standards Application: Within this system there are no wells that fit this standard.

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	1/ 6 Months
Groundwater Elevation	feet MSL	N/A	N/A	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	1/ 6 Months

Nitrogen, Total Kjeldahl Dissolved	mg/L	N/A	N/A	1/ 6 Months
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	1/ 6 Months
Nitrogen, Organic Dissolved	mg/L	2.1	N/A	1/ 6 Months
Chloride Dissolved	mg/L	125	250	1/ 6 Months
Solids, Total Dissolved	mg/L	380	N/A	1/ 6 Months

3.6.1 Changes from Previous Permit:

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Nitrogen, Nitrite + Nitrate: Changes to the PAL.

3.6.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

3.7 Groundwater Monitoring System for Spray Field 8

Location of Monitoring system: SEQ, Sec 35, Tn of Westfield, Marquette County

Groundwater Monitoring Well(s) to be Sampled: MW-139 (845)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-134 (834)

Groundwater Monitoring Well(s) Used for Point of Standards Application: Within this system there are no wells that fit this standard.

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	1/ 6 Months
Groundwater Elevation	feet MSL	N/A	N/A	1/ 6 Months
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	1/ 6 Months
Nitrogen, Total Kjeldahl Dissolved	mg/L	N/A	N/A	1/ 6 Months
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	1/ 6 Months
Nitrogen, Organic Dissolved	mg/L	2.1	N/A	1/ 6 Months
Chloride Dissolved	mg/L	125	250	1/ 6 Months

Solids, Total Dissolved	mg/L	380	N/A	1/ 6 Months
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3.7.1 Changes from Previous Permit:

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Nitrogen, Nitrite + Nitrate: Changes to the PAL.

3.7.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

4 Land Application - Sludge/By-Product Solids (industrial only)

4.1 Sample Point Number: 006- WWTP SLUDGE

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		tons/day	Daily	Total Daily	
Solids, Total		Percent	Monthly	Grab Comp	
Chloride		Percent	Monthly	Grab Comp	
pH Field		su	Monthly	Grab Comp	
Nitrogen, Total Kjeldahl		Percent	Monthly	Grab Comp	
Nitrogen, Ammonium (NH ₄ -N) Total		Percent	Annual	Grab Comp	
Phosphorus, Total		Percent	Annual	Grab Comp	
Phosphorus, Water Extractable		% of Tot P	Annual	Grab Comp	
Potassium, Total Recoverable		Percent	Annual	Grab Comp	
PFOA + PFOS		ug/kg	Once	Calculated	Once in 2027.
PFAS Dry Wt			Once	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

4.1.1 Changes from Previous Permit:

Sludge limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

Flow Rate – Sample frequency for flow rate increased to Daily to require reporting of the total volume of sludge distributed each day in the reporting period.

Sample Type – Sample type updated from “Grab” to “Grab Composite” to require a representative sample

PFAS –Monitoring is required once pursuant to s. NR 214.18(5)(b), Wis. Adm. Code.

4.1.2 Explanation of Limits and Monitoring Requirements

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

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.

5 Schedules

5.1 Chloride Source Reduction Measures (SRMs) for Groundwater Discharges

Required Action	Due Date
Final Annual Progress Report: Submit a report by the date specified including a written summary of any chloride source reduction measures completed in the current permit term, effluent chloride data summary, and evaluation of the success of the implemented reduction measures at complying with effective chloride limits.	01/31/2028

5.1.1 Explanation of Schedule

A decrease in chloride concentration over time indicates that the chloride reduction measures implemented during the previous permit term are having a positive impact. This schedule requires the permittee to continue reduction actions and maintain a low, optimized loading of chloride in the effluent, and summarize the results of those actions prior to the next permit reissuance. continued reduction efforts.

5.2 Land Treatment Management Plan

A management plan is required for the land treatment system.

Required Action	Due Date
Land Treatment Management Plan: Submit an update to the management plan to optimize the land treatment system performance and demonstrate compliance with Wisconsin Administrative Code NR	01/01/2027

214.	
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5.2.1 Explanation of Schedule

An up-to-date Land Treatment Management plan is a standard requirement in reissued industrial permits per ch. NR 214, Wis. Adm. Code.

5.3 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.	01/01/2027

5.3.1 Explanation of Schedule

An up-to-date Land Application Management plan is a standard requirement in reissued industrial permits per s. NR 214.17(6)(c), Wis. Adm. Code.

5.4 Groundwater Monitoring Well - Abandonment Evaluation

Required Action	Due Date
Submit Abandonment Evaluation: The permittee shall submit a well abandonment evaluation to the department by the Due Date. The evaluation shall 1) investigate the cost to abandon monitoring wells 820 (MW-120), 842 (MW-137), 843 (MW-137P), and 846 (MW-140); 2) investigate the cost of ongoing monitoring requirements at these wells; and 3) determine if it is cost effective for the facility to abandon monitoring wells 820 (MW-120), 842 (MW-137), 843 (MW-137P), and 846 (MW-140) or continue ongoing monitoring requirements.	11/30/2026
Implementation: Based on the evaluation conclusions the permittee shall either: 1) Complete abandonment of the monitoring well(s). The well(s) shall be abandoned in accordance with s. NR 141.25, Wis. Adm. Code. The permittee is not required to comply with the Annual Reports identified below. 2)The permittee shall annually inspect the monitoring wells and repair or maintain as needed. The permittee shall submit documentation of the inspection to the Department by June 30th of each year that list the dates of inspections, condition of each well and repairs made to the well. The permittee is required to comply with the Annual Reports identified below. Note: Documentation of well abandonment must be submitted to the Department within 60 days of well abandonment.	06/30/2027
Annual Report: Submit the annual monitoring well inspection report. If a well is abandoned, submit the abandonment report to the Department within 60 days of the date of abandonment per s. NR 141.25(4), Wis. Adm. Code.	06/30/2028
Annual Report: Submit the annual monitoring well inspection report. If a well is abandoned, submit the abandonment report to the Department within 60 days of the date of abandonment per s. NR	06/30/2029

141.25(4), Wis. Adm. Code.	
Annual Report: Submit the annual monitoring well inspection report. If a well is abandoned, submit the abandonment report to the Department within 60 days of the date of abandonment per s. NR 141.25(4), Wis. Adm. Code.	06/30/2030
Annual Report: Submit the annual monitoring well inspection report. If a well is abandoned, submit the abandonment report to the Department within 60 days of the date of abandonment per s. NR 141.25(4), Wis. Adm. Code.	06/30/2031
Continued Annual Report: Submit the annual monitoring well inspection report. In the event that this permit is not reissued prior to the expiration date, the permittee shall continue to conduct the well inspections and submit the required report to the Department by June 30th each year.	

5.4.1 Explanation of Schedule

A schedule is included in the permit to provide time for the permittee to determine and implement the cost-effective option between groundwater monitoring well abandonment and ongoing groundwater monitoring of wells 820 (MW-120), 842 (MW-137), 843 (MW-137P), and 846 (MW-140).

Attachments

Groundwater Evaluation Report for Brakebush Brothers, Inc. WI-0051527, Woody Myers, dated May 21, 2026.

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Ashley Clark, Wastewater Specialist

Date: July 14, 2026