City of Greenwood Public Noticed Permit Fact Sheet

General Information

Permit Number:	WI-0020249-11-0
Permittee Name:	City of Greenwood, PO Box D, Greenwood WI 54437
Discharge Location:	Greenwood Wastewater Treatment Facility, 420 Clear Water Drive, Greenwood, WI 54437 the east bank of the Black River ½ mile downstream from the Cty Hwy G Bridge NE1/4 SW1/4, Section 3, T26N R02W, City of Greenwood, Clark County, WI
Receiving Water:	the Black River in the Rock and Cawley Creeks watershed within the Black River Drainage Basin located in Clark County
StreamFlow ($Q_{7,10}$):	6.9 cfs
Stream Classification:	Warmwater sport fish community, Non-public Water Supply
Discharge Type:	Existing, continuous
Design Flow:	0.524 MGD Annual Average
Significant Industrial Loading?	Greenwood Milk Products and Dairy Concepts
Operator at Proper Grade?	Yes
Approved Pretreatment Program?	N/A

Facility Description

The Greenwood Wastewater Treatment Facility treats domestic waste from the City of Greenwood & the City of Loyal, and pretreated industrial waste from Greenwood Milk Products and Dairy Concepts. The annual average design flow of the facility is 0.524 million gallons per day (MGD). The actual annual average influent flow in 2023 was 0.315 MGD. The wastewater is treated via oxidation ditches and final clarification. Phosphorus is removed using chemical addition of ferric chloride. The wastewater is disinfected seasonally (May-Sept) with ultraviolet light prior to discharge to the Black River. Sludge is treated via aerobic and anaerobic digestion and thickened with a gravity belt thickener and land applied to DNR approved sites. The Department has reapproved water quality trading (WQT) as the method of complying with effluent phosphorus limits at Outfall 001. The Village of Greenwood submitted an updated Water Quality Trading Plan WQT-2024-0012 that provides details of the trade. The plan provides calculations and a table that shows the amount of phosphorus credits that will be available each year. Even with phosphorus credits available, there is still a phosphorus monthly average concentration effluent limit of 1 mg/L that acts as the minimum control level and applies to outfall 001. Significant effluent monitoring or limit changes proposed in the upcoming term are as follows: 1) an increase in the monitoring frequency for BOD, TSS, phosphorus & ammonia, 2) fecal coliform monitoring & limit replaced with *Escherichia coli* (*E. coli*), 3) monitoring for PFOS and PFOA added every other month in accordance with s. NR 106.98(2)(c), Wis. Adm. Code along with an associated compliance schedule, 4) the addition of annual monitoring for total nitrogen, nitrite + nitrate nitrogen and total Kjeldahl nitrogen, and 5) addition of chronic WET testing. The following changes have been made at both influent & effluent: 1) the flow monitoring frequency has been changed from continuous to daily for DMR reporting purposes, and 2) the sample type for various parameters has been changed from 24-hour flow

proportional composite to 24 hour composite. Additionally, to quantitate the risk, PFAS sludge sampling has been included in the permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

Substantial Compliance Determination

Enforcement During Last Permit: Greenwood has been actively working to balance phosphorus chemical use to not bring pH levels below their lower limit. They have had sporadic violations, which led to conversations about the issue, but no further enforcement has been taken as they have made progress in controlling this issue. After a desk top review of all Discharge monitoring reports, Land application reports, and compliance schedule items, and an inspection on 12/19/2023, Greenwood WWTF has been found to be in substantial compliance with their current permit.

Compliance determination entered by Jenna Monahan on 02/05/2024.

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**
701	Influent: 0.310 MGD (2023)	Representative influent samples shall be taken prior to the fine drum screen but after the bar screen.
001	Effluent to Black River: 0.193 MGD (2023)	Representative effluent samples shall be taken from the effluent wet well and grab samples from the sample tap in the basement. All samples shall be taken prior to discharge to the Black River.
002	80 dry US tons (as reported by their application)	Representative liquid sludge samples shall be collected annually from the storage tank and monitored for Lists 1, 2, 3 & 4 and PFAS and once in 2026 for PCBs.

1 Influent – Monitoring Requirements

Sample Point Number: 701- INFLUENT BEFORE SCREEN

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total		mg/L	3/Week	24-Hr Comp	
Suspended Solids, Total		mg/L	3/Week	24-Hr Comp	

Changes from Previous Permit:

1) the sample frequency for flow has been changed from “continuous” to “daily” for eDMR reporting purposes, and 2) the sample type for BOD & TSS has been changed from 24-hour flow proportional composite to 24 hour composite.

Explanation of Limits and Monitoring Requirements

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

2 Surface Water - Monitoring and Limitations

Sample Point Number: 001- EFFLUENT AFTER WET WELL

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Weekly Avg	15 mg/L	5/Week	24-Hr Comp	Limit applies May-Sept
BOD5, Total	Monthly Avg	15 mg/L	5/Week	24-Hr Comp	Limit applies May-Sept
BOD5, Total	Weekly Avg	45 mg/L	5/Week	24-Hr Comp	Limit applies Oct-April
BOD5, Total	Monthly Avg	30 mg/L	5/Week	24-Hr Comp	Limit applies Oct-April
Suspended Solids, Total	Weekly Avg	15 mg/L	5/Week	24-Hr Comp	Limit applies May-Sept
Suspended Solids, Total	Monthly Avg	15 mg/L	5/Week	24-Hr Comp	Limit applies May-Sept
Suspended Solids, Total	Weekly Avg	45 mg/L	5/Week	24-Hr Comp	Limit applies Oct-April
Suspended Solids, Total	Monthly Avg	30 mg/L	5/Week	24-Hr Comp	Limit applies Oct-April
pH Field	Daily Min	6.0 su	Daily	Grab	
pH Field	Daily Max	9.0 su	Daily	Grab	
Nitrogen, Ammonia (NH3-N) Total	Daily Max	14 mg/L	5/Week	24-Hr Comp	
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	14 mg/L	5/Week	24-Hr Comp	
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	14 mg/L	5/Week	24-Hr Comp	
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Limit & monitoring apply May - Sept
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit & monitoring apply May-Sept. See the E. coli Percent Limit section in permit. Enter the result in the DMR on the last day of

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					the month.
PFOS		ng/L	1/ 2 Months	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need schedule.
PFOA		ng/L	1/ 2 Months	Grab	
Phosphorus, Total	Monthly Avg	1.0 mg/L	5/Week	24-Hr Comp	Limit effective throughout the permit term, as it represents a minimum control level.
Phosphorus, Total		lbs/day	5/Week	Calculated	Report daily mass discharged using Equation 1a. in the Water Quality Trading (WQT) section.
WQT Credits Used (TP)		lbs/month	Monthly	Calculated	Report WQT TP Credits used per month using Equation 2c. in the Water Quality Trading (WQT) section. Available TP Credits are specified in Table 2 and in the approved Water Quality Trading Plan.
WQT Credits Used (TP)	Annual Total	1,348 lbs/yr	Annual	Calculated	The sum of total monthly credits used may not exceed Table 2 values listed below.
WQT Computed Compliance (TP)	6-Month Avg	0.075 mg/L	Monthly	Calculated	Compliance with the six-month average limit is evaluated at the end of the six-month period on June 30 and Dec 31.
WQT Computed Compliance (TP)	Monthly Avg	0.225 mg/L	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 3a. in the Water Quality Trading (WQT) section. Value entered on the last day of the month.
WQT Computed Compliance (TP)	6-Month Avg	0.33 lbs/day	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 3b. in the Water Quality Trading (WQT) section.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					Compliance with the six-month average limit is evaluated at the end of the six-month period on June 30 & Dec 31.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in permit.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section below. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET testing section in permit
Chronic WET		TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	

Changes from Previous Permit

Significant effluent monitoring and/or limit changes in this permit term are as follows: 1) the addition of annual monitoring for total nitrogen, nitrite + nitrate nitrogen and total Kjeldahl nitrogen, 2) an increase in the monitoring frequency for BOD, TSS, phosphorus and ammonia, 3) fecal coliform monitoring & limit have been replaced with *Escherichia coli* (*E. coli)*, 4) monitoring for PFOS and PFOA added every other month in accordance with s. NR 106.98(2)(c), Wis. Adm. Code, 5) addition of chronic WET testing, 6) the sample frequency for flow has been changed from "continuous" to "daily" for eDMR reporting purposes, and 7) the sample type for various parameters has been changed from 24 hour flow proportional composite to 24 hour composite.

Explanation of Limits and Monitoring Requirements

Monitoring Frequencies- The "Monitoring Frequencies for Individual Wastewater Permits" guidance (April 12, 2021) recommends that standard monitoring frequencies be included in individual wastewater permits based on the size and type of the facility, in order to characterize effluent quality and variability, to detect events of noncompliance, and to ensure consistency in permits issued across the state. Guidance and requirements in administrative code were considered when determining the appropriate monitoring frequencies for pollutants that have final effluent limits in effect during this permit term. Using the criteria previously stated, the department has determined an increase in monitoring frequency from 3/week to 5/week is appropriate for BOD, TSS, phosphorus, ammonia. These monitoring frequency increases are necessary in order to effectively characterize the effluent quality and variability, and to best determine compliance with effluent limitations.

Limits were determined for Greenwood's existing discharge to the Black River using chs. NR 102, 104, 105, 106, 207, 210, 212 and 217 of the Wisconsin Administrative Code (where applicable). For additional information on any of the limits see the September 27, 2024 memo from Ben Hartenbower to Holly Heldstab titled "Water Quality-Based Effluent Limitations for the Greenwood Wastewater Treatment Facility WPDES Permit No. WI-0020249".

MUNICIPAL EFFLUENT LIMITS – In accordance with the federal regulation 40 CFR 122.45(d), and to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7), Wis. Adm. Codes, limits in this permit are to be expressed as weekly average and monthly average limits whenever practicable.

BOD, TSS and pH: Monitoring frequency for BOD & TSS increased in order to effectively characterize the effluent quality and variability, and to best determine compliance with effluent limitations. However, limits for BOD, TSS & pH correspond to the requirements of the current permit since the facility has not increased the capacity of the wastewater treatment system since the last permit issuance, nor are increases expected during the term of the permit.

Ammonia: Current acute and chronic ammonia toxicity criteria for the protection of aquatic life are included in Tables 2C and 4B of ch. NR 105, Wis. Adm. Code. Subchapter IV of ch. NR 106 establishes the procedure for calculating water quality based effluent limitations (WQBELs) for ammonia. The limits carry over from the previous permit term.

Disinfection/*E. Coli*/Fecal Coliform: Greenwood disinfects the effluent May-Sept using ultraviolet (UV) light prior to discharge to the Black River. Fecal coliform monitoring and limits have been replaced with *Escherichia coli (E. coli*) monitoring and limits. Revisions to bacteria surface water quality criteria to protect recreational uses and accompanying *E. coli* WPDES permit implementation procedures became effective May 1, 2020. The new rule requires that WPDES permits for facilities with required disinfection include monitoring for E. coli while facilities are disinfecting during the recreation period and establish effluent limitations for *E. coli* established in s. NR 210.06 (2), Wis. Adm Code. The administrative code rule changes included the following actions: revised the bacteria water quality criteria from fecal coliform to *E. coli* to protect recreation in ch. NR 102, Wis. Adm. Code.; removed fecal coliform criteria for certain individual waters from ch. NR 104, Wis. Adm. Code.; revised permit requirements for publicly and privately owned sewage treatment works in ch. NR 210, Wis. Adm. Code.; and, updated approved analytical methods for bacteria in ch. NR 219, Wis. Adm. Code.

PFOS and PFOA – NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. At the first reissuance of a WPDES permit after August 1, 2022, the new rule requires WPDES permits for municipal dischargers with an average flow rate less than 1 MGD, to be evaluated on a case-by-case basis to determine if monitoring is required pursuant to s. NR 106.98(2)(c), Wis. Adm. Code. The department evaluated the need for PFOS and PFOA monitoring taking into consideration the presence of potential PFOS or PFOA industrial wastes, remediation sites and other potential sources of PFOS or PFOA. Based on information available at the time the permit was drafted, PFOS/PFOA monitoring is required because of the nondomestic contributions. Therefore, monitoring once every two months is included. A sample frequency of 1/2 months means one sample is taken during any two-month period. Examples of 1/2 month sample would be every other month (Jan, March, May, etc.) or back-to-back months with a break in between (February & March, May & June, Aug & Sept, etc.). DMR Short Forms will be generated for the following time periods: January-February, March-April, May-June, July-August, September-October, and November-December. At a minimum one sample result will be present on each form. The initial determination of the need for sampling shall be conducted for up to two years in order to determine if the permitted discharge has the reasonable potential to cause or contribute to an exceedance of the PFOS or PFOA standards under s. NR 102.04(8)(d)1, Wis. Adm. Code.

Phosphorus: Phosphorus Rules took effect 12/1/2010 and detailed in NR 102, Water Quality Standards for Wisconsin Surface Waters and NR 217, Effluent Standards and Limitations for Phosphorus. For the reasons explained in the April 30, 2012 paper entitled 'Justification for Use of Monthly, Growing Season and Annual Average Periods for Expression of WPDES Permit Limits for Phosphorus Discharges in Wisconsin', WDNR has determined that it is impracticable to express the phosphorus WQBEL for the permittee as a maximum daily, weekly or monthly values.

The applicable phosphorus standard for the Black River, which is classified as a warmwater sport fish aquatic life system, is 0.075 mg/L. Since the Black River is exceeding its applicable phosphorus criteria, the discharge is subject to s. NR 217.13 (8), Wis. Adm. Code. The final effluent limits for phosphorus are 0.075 mg/L and 0.033 lbs/day, expressed as a

six-month average, and 0.225 mg/L expressed as a monthly average. The 6-month averaging periods will be January – June and July - December. These phosphorus water quality-based effluent limits appear as 'WQT TP Computed Compliance", because the City of Greenwood has opted to comply with these limits through water quality trading (WQT-2024-0007 approved February 6, 2024). By installing streambank stabilization practices within the watershed., the City of Greenwood is currently generating 1348 lbs/year of phosphorus credits. The permittee is also required to report "WQT TP Credits" as shown above. The permittee is also required to comply with a monthly average phosphorus limit of 1.0 mg/L as the 'Minimum Control Level". This "Minimum Control Level" is required as described in the water quality trading guidance (DNR Guidance 3800-2013-04). Additional WQT subsections in the permit provide information on annual reporting and re-opening of the permit.

Table 1. Available Phosphorus Credits per WQT-2024-0012

Year	Available TP Credits (lbs/yr) – Total
2025	1348
2026	1348
2027	1348
2028	1348
2029	1348

Total Nitrogen Monitoring (NO2+NO3, TKN and Total N)- The Department has included effluent monitoring for Total Nitrogen in the permit through the authority under §§ 283.55(1)(e), Wis. Stats., which allows the department to require the permittee to submit information necessary to identify the type and quantity of any pollutants discharged from the point source, and through s. NR 200.065(1)(h), Wis. Adm. Code, which allows for this monitoring to be collected during the permit term. More information on the justification to include total nitrogen monitoring in wastewater permits can be found in the "Guidance for Total Nitrogen Monitoring in Wastewater Permits" dated October 1, 2019. Annual tests are scheduled in the following rotating quarters:

- 1st quarter (Jan – March) 2025
- 2nd quarter (April – June) 2026
- 4th quarter (Oct – Dec) 2027
- 3rd quarter (July – Sept) 2028
- 1st quarter (Jan – March) 2029

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

Acute WET tests are required in the following quarters:

- 2nd quarter (April – June) 2026
- 1st quarter (Jan – March) 2029

Chronic WET tests are required in the following quarters:

- 2nd quarter (April – June) 2026
- 3rd quarter (July – Sept) 2028
- 1st quarter (Jan – March) 2029

3 Land Application - Monitoring and Limitations

Municipal Sludge Description						
Sample Point	**Sludge Class (A or B)**	**Sludge Type (Liquid or Cake)**	**Pathogen Reduction Method**	**Vector Attraction Method**	**Reuse Option**	**Amount Reused/Disposed (Dry Tons/Year)**
002	B	Liquid	Fecal Coliform	Incorporation	Land Application	80 dry US tons (as reported by their application)
Does sludge management demonstrate compliance? Yes						
Is additional sludge storage required? No						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? No						
Is a priority pollutant scan required? No Priority pollutant scans are required once every 10 years at facilities with design flows between 5 MGD and 40 MGD, and once every 5 years if design flow is greater than 40 MGD.						

Sample Point Number: 002- LIQUID SLUDGE FROM TANK

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Annual	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Annual	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Annual	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Annual	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Annual	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Annual	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Annual	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Annual	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Annual	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Annual	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Annual	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Annual	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Annual	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Annual	Composite	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Zinc Dry Wt	Ceiling	7,500 mg/kg	Annual	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Annual	Composite	
Nitrogen, Total Kjeldahl		Percent	Annual	Composite	
Nitrogen, Ammonium (NH4-N) Total		Percent	Annual	Composite	
Phosphorus, Total		Percent	Annual	Composite	
Phosphorus, Water Extractable		% of Tot P	Annual	Composite	
Potassium, Total Recoverable		Percent	Annual	Composite	
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Once in 2026
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Once in 2026
PFOA + PFOS		ug/kg	Annual	Calculated	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.
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:

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

Explanation of Limits and Monitoring Requirements

Requirements for 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. Limitations for PCBs are addressed in s. NR 204.07(3)(k).

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA is currently developing a risk assessment to determine future land application rates and expects to release this risk assessment by the end of 2024. In the interim, the department has developed the "Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS".

Collecting sludge data on PFAS concentrations from a wide range of wastewater treatment facilities will help protect public health from exposure to elevated levels of PFAS and determine the department's implementation of EPA's recommendations. To quantitate this risk, PFAS sampling has been included in the proposed WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

4 Schedules

4.1 PFOS/PFOA Minimization Plan Determination of Need

Required Action	Due Date
Report on Effluent Discharge: Submit a report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations. This analysis should also include a comparison to the applicable narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results.	12/31/2025
Report on Effluent Discharge and Evaluation of Need: Submit a final report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations of data collected over the last 24 months. The report shall also provide a comparison on the likelihood of the facility needing to develop a PFOS/PFOA minimization plan. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results. The permittee shall also submit a request to the department to evaluate the need for a PFOS/PFOA minimization plan. If the Department determines a PFOS/PFOA minimization plan is needed based on a reasonable potential evaluation, the permittee will be required to develop a minimization plan for Department approval no later than 90 days after written notification was sent from the Department. The Department will modify or revoke and reissue the permit to include PFOS/PFOA minimization plan reporting requirements along with a schedule of compliance to meet WQBELs. Effluent monitoring of PFOS and PFOA shall continue as specified in the permit until the modified permit is issued. If, however, the Department determines there is no reasonable potential for the facility to discharge PFOS or PFOA above the narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code, no further action is required and effluent monitoring of PFOS and PFOA shall continue as specified in the permit.	12/31/2026

Explanation of Schedule: As stated above, NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. S. NR 106.98, Wis. Adm. Code, specifies steps to generate data in order to determine the need for reducing PFOS and PFOA in the discharge. Data generated per the effluent monitoring requirements will be used to determine the need for developing a PFOS/PFOA minimization plan. As part of the schedule, the permittee is required to submit two annual Reports on Effluent Discharge.

If the Department determines that a minimization plan is needed, the permit will be modified or revoked/reissued to include additional requirements.

4.2 Annual Water Quality Trading (WQT) Report

Required Action	Due Date
Annual WQT Report: Submit an annual WQT report that shall cover the previous year. The WQT Report shall include: The number of pollutant reduction credits (lbs/month) used each month of the previous year to demonstrate compliance; The source of each month's pollutant reduction credits by identifying the approved water quality trading plan that details the source; A summary of the annual inspection of each nonpoint source management practice that generated any of the pollutant reduction credits used during the previous year; and Identification of noncompliance or failure to implement any terms or conditions of this permit with respect to water quality trading that have not been reported in discharge monitoring reports.	01/31/2025
Annual WQT Report #2: Submit an annual WQT report that shall cover the previous year.	01/31/2026
Annual WQT Report #3: Submit an annual WQT report that shall cover the previous year.	01/31/2027
Annual WQT Report #4: Submit an annual WQT report that shall cover the previous year.	01/31/2028
Annual WQT Report #5: Submit the 5th annual WQT report. If the permittee wishes to continue to comply with phosphorus limits through WQT in subsequent permit terms, the permittee shall submit a revised WQT plan including a demonstration of credit need, compliance record of the existing WQT, and any additional practices needed to maintain compliance over time.	01/31/2029
Annual WQT Report Required After Permit Expiration: In the event that this permit is not reissued by the expiration date, the permittee shall continue to submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.	

Explanation of Schedule: The permittee shall submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.

Other Comments:

Publishing Newspaper: The Chronicle, 34 South First Street Black River Falls, WI 54615

Attachments:

- Water Quality Based Effluent Limits: September 27, 2024 memo from Ben Hartenbower to Holly Heldstab titled "Water Quality-Based Effluent Limitations for the Greenwood Wastewater Treatment Facility WPDES Permit No. WI-00205449"
- Water Quality Trading Plan, WQT-2024-0012
- Water Quality Trading Conditional Plan Approval letter dated July 8, 2024 from Jenna Monahan to David Hansen, Mayor of City of Greenwood

Expiration Date:

December 31, 2029

Justification Of Any Waivers From Permit Application Requirements

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

Prepared By: Holly Heldstab, Wastewater Specialist **Date:** November 11, 2024