Public Noticed Ettrick WWTF Draft Permit Fact Sheet

General Information

Permit Number	WI-0020621-11-0
Permittee Name and Address	Village of Ettrick 22864 N Main St. P.O. Box 125, Ettrick, WI 54627
Permitted Facility Name and Address	Ettrick Wastewater Treatment Facility 15866 West Judd Street, Ettrick, WI
Permit Term	October 01, 2025 to September 30, 2030
Discharge Location	The east bank of Beaver Creek, south of bridge on Bridge St. approximately 100 yards
Receiving Water	North Fork of Beaver Creek in Beaver Creek and Lake Marinuka of Black River in Trempealeau County
Stream Flow ($Q_{7,10}$)	9.6 cfs
Stream Classification	Coldwater Stream, Non-public water supply
Discharge Type	Existing, Continuous
Annual Average Design Flow (MGD)	0.063 MGD
Industrial or Commercial Contributors	None
Plant Classification	A2 - Attached Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; D - Disinfection; P – Total Phosphorus, and SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

Wastewaters from the Village of Ettrick are treated at a rotating biological contact (RBC) type wastewater treatment facility with an annual average design flow of 0.063 MGD, and then discharged to the North Fork of Beaver Creek. The actual annual average flow for 2023 was 0.019 MGD. The plant consists of a primary clarifier, RBC, ferric chloride addition prior to RBC's, unit final clarifier, anaerobic sludge digestor, and a chlorination/dechlorination disinfection system. The sludge generated is anaerobically digested in sludge storage tanks then hauled to be land applied on department approved sites. The facility has the ability to pump sludge to drying beds, but has not used them in recent years. Significant changes for this issuance include 1) Additional ammonia nitrogen and chlorine weekly and monthly average limits to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7), Wis. Adm. Codes, 2) lower effluent phosphorus interim limits associated with an approved multi-discharger variance for phosphorus (MDV) and compliance schedules to comply with s. 283.16, Wis. Stats. requirements for phosphorus, and 3) PFAS sludge sampling has been included in the WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code to quantitate risk.

Substantial Compliance Determination

Enforcement During Last Permit: Enforcement During Last Permit: The facility received a notice of noncompliance (NON) in September 2020 for phosphorus exceedances. The facility piloted chemical addition and began discharging below their limit as outlined in the WPDES. In February 2022 the operator miscalculated weeks in the month and missed a sample for BOD, Ammonia, TSS and Phosphorus, an extra sample was taken in March to make up for the missed sample. During the compliance inspection in December 2024 it was found that the facility did not have a chemical addition system matching the plans and specs submitted previously. In December 2024 the facility received an NON for failure to construct a chemical feed system compliant with NR 110.22 following submittal of a design report and plans and specs that were approved in 2020 by the Department.

After a desk top review of all Discharge monitoring reports, CMARs, Land application reports, and compliance schedule items, and an inspection on 12/10/2024, Ettrick WWTF has been found to be in substantial compliance with their current permit.

Compliance determination made by: Jenna Monahan, Wastewater Engineer, on December 10, 2024.

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)**
701	N/A	Representative 24 hr composite influent samples shall be collected prior to the comminutor and bar screen.
001	0.019 MGD	Representative composite effluent samples shall be collected after the final clarifier and prior to disinfection. Grab samples shall be collected after disinfection and prior to discharge to the North Fork of Beaver Creek.
002	No discharge	Representative annual cake sludge samples shall be collected from the drying bed and monitored for List 2 parameters.
003	37,600 gallons of liquid sludge over the last 5 years	Representative liquid sludge samples shall be collected from the anaerobic digester annually and monitored for List 1 and List 2 parameters, PFAS, and once in 2027 for PCBs.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- INFLUENT PRIOR TO COMMINUTOR

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

1.1.1 Changes from Previous Permit:

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

1.1.2 Explanation of Limits and Monitoring Requirements

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

2.1 Sample Point Number: 001- PRIOR TO DISCHARGE

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow	
BOD5, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow	
Suspended Solids, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow	
Suspended Solids, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow	
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	108 mg/L	2/Week	24-Hr Flow	Limit effective Nov-Apr annually.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	108 mg/L	2/Week	24-Hr Flow	Limit effective Nov-Apr annually.
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	52 mg/L	2/Week	24-Hr Flow	Limit effective May-Oct annually.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	52 mg/L	2/Week	24-Hr Flow	Limit effective May-Oct annually.
Nitrogen, Ammonia (NH3-N) Total	Daily Max - Variable	mg/L	2/Week	24-Hr Flow	Report the daily maximum Ammonia result in the Nitrogen, Ammonia (NH3-N) Total column of the eDMR. See Ammonia Limitation Section.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nitrogen, Ammonia Variable Limit		mg/L	2/Week	See Table	Look up the variable ammonia limit from the 'Variable Ammonia Limitation' table and report the variable limit in the Ammonia Variable Limit column on the eDMR.
E. coli	Geometric Mean – Monthly	126 #/100 ml	Weekly	Grab	Limit effective May-Sept annually.
E. coli	% Exceedance	10 Percent	Monthly	Grab	Limit effective May-Sept annually.
Chlorine, Total Residual	Daily Max	38 ug/L	Daily	Grab	Limit effective May-Sept annually.
Chlorine, Total Residual	Weekly Avg	38 ug/L	Daily	Grab	Limit effective May-Sept annually.
Chlorine, Total Residual	Monthly Avg	38 ug/L	Daily	Grab	Limit effective May-Sept annually.
Phosphorus, Total	Monthly Avg	1.0 mg/L	3/Week	24-Hr Flow	This is an interim MDV limit effective until Sept 30, 2027. See the MDV/Phosphorus subsections and phosphorus schedules.
Phosphorus, Total	Monthly Avg	0.6 mg/L	3/Week	24-Hr Flow	This is an interim MDV limit effective starting Oct 1, 2027. See the MDV/Phosphorus subsections and phosphorus schedules.
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

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					effect) for the calendar year on the Annual report form.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow	Annual in rotating quarters. See Nitrogen Series Monitoring section.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow	Annual in rotating quarters. See Nitrogen Series Monitoring section.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Annual in rotating quarters. See Nitrogen Series Monitoring section. 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	See WET subsection in permit.

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: 1) Additional ammonia nitrogen and chlorine weekly and monthly average limits to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7), Wis. Adm. Codes, and 2) lower effluent phosphorus interim limits associated with an approved multi-discharger variance for phosphorus (MDV).

See additional explanation of limits under "Explanation of Limits and Monitoring Requirements" below.

2.1.2 Explanation of Limits and Monitoring Requirements

Detailed discussions of limits and monitoring requirements can be found in the attached water quality-based effluent limits (WQBEL) memo from Benjamin Hartenbower to Angela Parkhurst titled "Water Quality-Based Effluent Limitations for the Ettrick Wastewater Treatment Facility, WDES Permit No. WI-0020621" dated **May 22, 2025**.

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. The only increase is for ammonia nitrogen frequency to 2/week that is minimum for this type of facility,

Expression of Limits- In accordance with the federal regulation 40 CFR 122.45(d) and s. NR 205.065, Wis. Adm. Code, limits in this permit are to be expressed as weekly and monthly average limits whenever practicable. Minor changes have been made to ammonia nitrogen and chlorine to include these types of limits.

Phosphorus – Phosphorus rules became effective December 1, 2010 per 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 monthly average, and 0.075 mg/L and 0.039 lbs/day 6 month averages and were to become effective as scheduled unless a variance was granted. For this permit term, the permittee has reapplied 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. The effluent limit for total phosphorus is 1.0 mg/L as an average monthly limit until October 1, 2027 when it reduces to 0.6 mg/L following the corresponding compliance schedule.

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.

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.

Daily maximum ammonia limits that vary with effluent pH apply year-round. See table below for more information. Samples for ammonia shall be collected at the same time as the pH samples.

Daily Maximum Ammonia Nitrogen Limits – WWSF

Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L
$6.0 \leq pH \leq 6.1$	108	$7.0 < pH \leq 7.1$	66	$8.0 < pH \leq 8.1$	14
$6.1 < pH \leq 6.2$	106	$7.1 < pH \leq 7.2$	59	$8.1 < pH \leq 8.2$	11
$6.2 < pH \leq 6.3$	104	$7.2 < pH \leq 7.3$	52	$8.2 < pH \leq 8.3$	9.4
$6.3 < pH \leq 6.4$	101	$7.3 < pH \leq 7.4$	46	$8.3 < pH \leq 8.4$	7.8
$6.4 < pH \leq 6.5$	98	$7.4 < pH \leq 7.5$	40	$8.4 < pH \leq 8.5$	6.4
$6.5 < pH \leq 6.6$	94	$7.5 < pH \leq 7.6$	34	$8.5 < pH \leq 8.6$	5.3
$6.6 < pH \leq 6.7$	89	$7.6 < pH \leq 7.7$	29	$8.6 < pH \leq 8.7$	4.4
$6.7 < pH \leq 6.8$	84	$7.7 < pH \leq 7.8$	24	$8.7 < pH \leq 8.8$	3.7
$6.8 < pH \leq 6.9$	78	$7.8 < pH \leq 7.9$	20	$8.8 < pH \leq 8.9$	3.1
$6.9 < pH \leq 7.0$	72	$7.9 < pH \leq 8.0$	17	$8.9 < pH \leq 9.0$	2.6

Total Nitrogen Monitoring (NO2+NO3, TKN and Total N)- The Department has included effluent monitoring for Total Nitrogen through the authority under s. 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 monitoring in rotating quarters are required as specified in the permit.

Disinfection/E. Coli--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. Monitoring and limits for E. Coli are required seasonally May-September throughout the permit term.

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 The facility is required to perform 2 acute WET tests in different seasons as specified in the permit.

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	Cake	Anaerobic Digestion	Volatile Solids/ Incorporation	Land Applied	None
003	B	Liquid	Anaerobic Digestion	Injection	Land Applied	37,600 gallons over 5 yrs
Does sludge management demonstrate compliance? Yes, Ettrick uses contracted hauler Arcade Pumping to haul and landspread. Sludge 002 and 003 are from the same source, so the dry wt of metals will be the same from either source, so they only need to test one. The % solids and nutrients need to be tested from both. Pathogen/Vectors need to be tested/satisfied for both outfalls.						
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 because the design flow is under 5 MGD.						

3.1 Sample Point Number: 002- Drying bed cake

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Annual	Composite	
Nitrogen, Total Kjeldahl		Percent	Annual	Composite	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
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	

3.1.1 Changes from Previous Permit:

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

3.1.2 Explanation of Limits and Monitoring Requirements

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. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

3.2 Sample Point Number: 003- Anaerobically digested liquid

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	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
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	
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	Sample once in 2027. See PCB subsection.
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Sample once in 2027. See PCB subsection.
PFOA + PFOS		ug/kg	Annual	Calculated	Report the sum of PFOA and PFOS. 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.

3.2.1 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:

PFAS –Monitoring is required annually pursuant to **s.** NR 204.06(2)(b)9., Wis. Adm. Code.

3.2.2 Explanation of Limits and Monitoring Requirements

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. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

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 this WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

4 Schedules

4.1 Operator Certification

Required Action	Due Date
P Subclass: Per s NR 114.53 Wis. Adm. Code, the permittee shall have an operator in charge certified in the P subclass (Total Phosphorus) by the due date. Within 30 days of receiving the certification, the permittee shall notify the department in writing of the certified operator's name and certification number with the P subclass certification.	01/31/2026

4.2 Phosphorus Schedule - Continued Optimization

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

Required Action	Due Date
Optimization: The permittee shall continue to implement the optimization plan as previously approved to optimize performance to control phosphorus discharges. Submit a progress report on optimizing removal of phosphorus by the Due Date.	09/30/2026
Progress Report #2: Submit a progress report on optimizing removal of phosphorus.	09/30/2027
Progress Report #3: Submit a progress report on optimizing removal of phosphorus.	09/30/2028
Progress Report #4: Submit a progress report on optimizing removal of phosphorus.	09/30/2029
Progress Report #5: Submit a progress report on optimizing removal of phosphorus.	09/30/2030

4.2.1 Explanation of Schedule

Continued 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 continue to implement the optimization plan that was approved during the previous permit term.

4.3 Phosphorus Multi-Discharger Variance Interim Limit (0.6 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.	09/30/2026
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.	12/31/2026
Initiate Actions: Initiate actions identified in the plan.	03/31/2027
Complete Actions: Complete actions identified in the plan and achieve compliance with the specified interim effluent limit.	09/30/2027

4.3.1 Explanation of Schedule

0.6 mg/L 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 2 years to comply with that limit.

4.4 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 ($66.62 per pound)] or $640,000, whichever is less. See the payment calculation steps in 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.	03/01/2026
Annual Verification of Payment #2: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2027
Annual Verification of Payment #3: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2028
Annual Verification of Payment #4: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2029

Annual Verification of Payment #5: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2030
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.	

4.4.1 Explanation of Schedule

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 $52.02 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).

Other Comments

TBD

Attachments

Water Quality Based Effluent Limits – From Benjamin Hartenbower to Angela Parkhurst titled "Water Quality-Based Effluent Limitations for the Ettrick Wastewater Treatment Facility, WDES Permit No. WI-0020621", dated March May 22, 2025.

Public Notice- Trempealeau County Times, PO Box 95, Whitehall, WI 54773

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Angela Parkhurst Wastewater Specialist Date: August 13, 2025