

Public Noticed Draft Junction City Permit Fact Sheet

General Information

Permit Number	WI-0028070-11-0
Permittee Name and Address	Village of Junction City 1001 Main St. PO Box 93, Junction City, WI 54443-9789
Permitted Facility Name and Address	Junction City Wastewater Treatment Facility 800 Center Ave., Junction City, WI
Permit Term	April 01, 2026 to March 31, 2031
Discharge Location	The north bank of the tributary to Mill Creek, ½ mile west of County Trunk O NW1/4 SW1/4, Section 02, T24N R06E, Portage County, Village of Junction City, WI
Receiving Water	Mill Creek in Mill Creek Watershed of Central Wisconsin River Basin in Portage County
Stream Flow (Q _{7,10})	0 cfs
Stream Classification	Limited Aquatic Life, Non-public Water Supply
Discharge Type	Existing, continuous
Annual Average Design Flow (MGD)	0.109 MGD
Industrial or Commercial Contributors	None
Plant Classification	A1 - Suspended Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; P - Total Phosphorus; L - Laboratory; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

The Junction City Wastewater Treatment Facility treats domestic wastewater from the Village of Junction City. The annual average design flow of this activated sludge type facility is 0.109 million gallons per day (MGD). The actual annual average influent flow in 2024 was 0.084 MGD. Wastewater undergoes secondary treatment via an oxidation ditch and a final clarifier. The oxidation ditch outer channel has been retrofitted to create anoxic conditions to assist in biological phosphorus absorption. Effluent is discharged to an unnamed tributary of Mill Creek. Liquid sludge storage in excess of 180 days is provided on site. Sludge is recycled via land application on Department approved fields. Operational changes include a new process building to house new fine screening, chemical storage and blowers, the addition of fine bubble diffusers to the inner aerobic ditch and elimination of the coupled aeration /mixing in the oxidation ditch, addition of VFDs on the aerators, replacement of the RAS and WAS pumps, new flowmeters for the RAS, effluent, and influent, and the addition of DO, ORP, and sludge agitation temperature probes.

Significant effluent monitoring and/or limit changes this permit term are as follows: 1) increased monitoring frequencies for effluent dissolved oxygen and phosphorus, 2) the addition of monitoring for effluent PFOS and PFOA monthly and an associated determination of need schedule in accordance with s. NR 106.98(2)(b), Wis. Adm. Code., 3) the conditional re-approval of a multi-discharger variance (MDV) for phosphorus and the imposition of a lower monthly average interim phosphorus limit along with associated compliance schedules to comply with s. 283.16, Wis. Stats. requirements for

phosphorus, 4) the addition of acute and chronic whole effluent toxicity (WET) testing, 5) new E. coli effluent limits based on the new rule which 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. and an associated compliance schedule to meet the new limits, and 6) 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: A NON was issued on 11/08/2023 for total phosphorus exceedances and a NON was issued on 06/13/2024 for violations of the influent flow monitoring device. A facility plan for operational improvements was department approved on 05/17/2024 and the specified actions are expected to remedy the alleged violations.

After a desk top review of all discharge monitoring reports, CMARs, land app reports, compliance schedule items, and a site visit on 06/05/2024, the Junction City Wastewater Treatment Facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Nick Lindstrom on 06/05/24.

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	0.08 MGD (2024)	Representative influent samples shall be collected after the flume, at the head of the plant.
001	No flow measurements	Representative composite effluent samples shall be collected at the outfall of the final clarifier weir. Representative grab samples shall be collected at the effluent pipe from the plant.
002	8 dry metric tons (2024)	Representative sludge composite samples shall be collected from the storage tank annually and monitored for Lists 1, 2, 3, 4, PFAS, and once for PCBs.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- INFLUENT AFTER FLUME

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 Flow Prop Comp	

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

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

2.1 Sample Point Number: 001- EFFLUENT to TRIB of MILL CRK

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
BOD5, Total	Monthly Avg	20 mg/L	3/Week	24-Hr Flow Prop Comp	
BOD5, Total	Weekly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	20 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Dissolved Oxygen	Daily Min	4.0 mg/L	Daily	Grab	
Nitrogen, Ammonia (NH3-N) Total		mg/L	Monthly	24-Hr Flow Prop Comp	
E. coli		#/100 ml	Weekly	Grab	Monitoring only May - September annually until the final limit goes into effect per the Effluent Limitations for E. coli Schedule.

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Limit Effective May - September annually per the Effluent Limitations for E. coli Schedule.
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit Effective May – September annually per the Effluent Limitations for E. coli Schedule. See the E. coli Percent Limit section below. Enter the result in the DMR on the last day of the month.
PFOS		ng/L	Monthly	Grab	See PFOS/PFOA footnote below and Schedules section.
PFOA		ng/L	Monthly	Grab	See PFOS/PFOA footnote below and Schedules section.
Phosphorus, Total	Monthly Avg	0.8 mg/L	3/Week	24-Hr Flow Prop Comp	This is an interim MDV limit effective through March 31, 2029. See the MDV/Phosphorus permit sections and phosphorus schedules.
Phosphorus, Total	Monthly Avg	0.6 mg/L	3/Week	24-Hr Flow Prop Comp	This is an interim MDV limit effective on April 1, 2029. See the MDV/Phosphorus permit sections 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 Prop Comp	Annual in specific quarters. See Nitrogen Series Monitoring section.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in specific quarters. See Nitrogen Series Monitoring section.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Annual in specific 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 Prop Comp	See WET footnote.
Chronic WET		TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET footnote.

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.

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 dated December 16, 2025, from Benjamin Hartenbower to Angela Parkhurst and titled “Water Quality Based Effluent Limitations for the Junction City WPDES Permit No. WI-0028070.

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. Dissolved oxygen and pH sample frequencies have changed to daily and phosphorus to 3/week.

BOD, TSS, pH and Dissolved Oxygen: Limits for BOD, TSS, pH and dissolved oxygen correspond to the requirements in 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 proposed 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.

The Junction City Wastewater Treatment Facility had previously been exempted from disinfection based on the limited aquatic life or limited forage fish community classification of the receiving water. Section NR 210.06(3)(g), Wis. Adm. Code, states that disinfection decisions may be made based on the hydrologic classifications listed in s. NR 104.02(1), Wis. Adm. Code (not on the water quality classifications - i.e., limited forage fish, limited aquatic life - that are defined in s. NR 104.02(3), Wis. Adm. Code). The hydrologic classification for unnamed tributary, upstream of Mill Creek is listed in ch. NR 104, Wis. Adm. Code, as noncontinuous.

Discharges to noncontinuous streams with $7-Q_{10}$ values < 0.1 cfs usually result in effluent-dominated situations. The risk of illness is related to the concentration of *E. coli* and therefore dilution is an important consideration when considering risk to human health. Since little to no dilution is present in these situations, disinfection should not be exempted based solely on this hydrological classification.

With weekly monitoring, the 410 counts/100 mL limit will effectively function as a daily maximum limit unless the facility performs additional monitoring. Any additional monitoring beyond what is required by the permit must also be reported on the DMR as required in the standard requirements section of the permit. These limits are required May through September.

E. coli monitoring is required upon the first permitted disinfection period. At the end of the compliance schedule, E. coli limits of 126 #/100 ml as a monthly geometric mean that may not be exceeded and 410 #/100 ml as a daily maximum that may not be exceeded more than 10 percent of the time in any calendar month will apply. However, if effluent monitoring becomes available which shows that the discharge can meet bacteria limits during the recreation season without disinfection, disinfection will not be required, according to s. NR 210.06(3)(d), Wis. Adm. Code, and as discussed in the “Disinfection Requirements for Discharges to Surface Waters” guidance. Weekly E. coli effluent monitoring for at least one disinfection season will need to be included in the permit in order to make this determination and ensure that the recreational use is being protected (criteria are being met) without disinfection.

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. Because biosolids data shows significant (>150 ug/kg) concentrations of PFOA/PFOS, effluent monitoring is included to determine whether there are potential sources to the POTW. Monthly monitoring is included due to the variability/seasonality of discharge. 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.

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.

Wisconsin River Total Maximum Daily Load (TMDL): Junction City Wastewater Treatment Facility is located within the Wisconsin River Basin Total Maximum Daily Load (TMDL), which was approved by EPA April 26, 2019. The TMDL establishes Waste Load Allocations (WLAs) for point source dischargers and determines the maximum amounts of phosphorus that can be discharged and still protect water quality.

Total phosphorus (TP) effluent limits in lbs/day are calculated as recommended in the *TMDL Development and Implementation Guidance: Integrating the WPDES and Impaired Waters Programs (April 2020)* and are based on the annual phosphorus wasteload allocation (WLA) given in lbs/yr. This WLA is found in Appendix K of the *Wisconsin River TMDL Report (April 2019)* and is expressed as a maximum annual load (lbs/yr). For the Junction City Wastewater Treatment Facility, this WLA is 122 lbs/yr and 0.33 lbs/day, with a calculated final monthly average limit of 0.655 lbs/day.

Phosphorus MDV: The Junction City Wastewater Treatment Facility has re-applied for the phosphorus multi-discharger variance (MDV). Conditions of the phosphorus MDV require the facility to comply with an interim phosphorus limit of 0.8 mg/L monthly average, followed by 0.6 mg/L monthly average limit per the associated compliance schedule, in lieu of meeting the final TMDL Limit of 0.655 lbs/day.

The permittee is required to report the total amount of phosphorus discharged in lbs/month and lbs/year. By March 1 of each year the permittee shall make a payment(s) to participating county(s) of \$66.62 per pound of phosphorus discharged during the previous year in excess of the target value 0.2 mg/L.

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 WQBEL is 0.655 lbs/day and were to become effective as scheduled unless a variance was granted. For this permit term, the permittee has applied for the Multi-Discharger Variance (MDV) for phosphorus as provided for in s. 283.16, Wis. Stats., and approved by USEPA on September 3, 2025 for a 10-year duration. 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 interim effluent limit for total phosphorus is continues with a 0.8 mg/L monthly average limit which is currently achievable, followed by a highest attainable condition limit of 0.6 mg/L as a monthly average set to begin according to the associated 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 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 nonpoint source phosphorus control strategies at the watershed level.

Total Nitrogen Monitoring (NO₂+NO₃, TKN and Total N): The Department has included effluent monitoring for Total Nitrogen 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 is required as specified in the permit.

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 two acute and three chronic 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	Liquid	Fecal Coliform	Injection	Land Application	8 dry metric tons (2024)
Does sludge management demonstrate compliance? Yes						
Is additional sludge storage required? yes						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? No						
Is a priority pollutant scan required? No						

3.1 Sample Point Number: 002- SLUDGE FROM STORAGE 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	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Annual	Composite	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Zinc Dry Wt	High Quality	2,800 mg/kg	Annual	Composite	
Nitrogen, Total Kjeldahl		Percent	Annual	Composite	
Nitrogen, Ammonium (NH ₄ -N) Total		Percent	Annual	Composite	
Phosphorus, Total		Percent	Annual	Composite	
Phosphorus, Water Extractable		% of Tot P	Annual	Composite	
Potassium, Total Recoverable		Percent	Annual	Composite	
PFOA + PFOS		ug/kg	Annual	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	See PCB Section for more information.
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	See PCB Section 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.

3.1.1 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.

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

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).

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.

4 Schedules

4.1 PFOS/PFOA Minimization Plan Determination of Need

Required Action	Due Date
<p>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.</p> <p>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.</p>	03/31/2027
<p>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.</p> <p>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.</p> <p>The permittee shall also submit a request to the department to evaluate the need for a PFOS/PFOA minimization plan.</p> <p>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.</p> <p>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.</p>	03/31/2028

4.1.1 Explanation of Schedule

PFOS/PFOA Minimization Plan Determination of Need- As stated above, ch. NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Section 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.

4.1 Effluent Limitations for E. coli

The permittee shall comply with surface water limitations for E. coli as specified. No later than 14 days following each compliance date, the permittee shall notify the Department in writing of its compliance or noncompliance. If a submittal is required, a timely submittal fulfills the notification

Required Action	Due Date
<p>Status Update: The permittee shall submit information within the discharge monitoring report (DMR) comment section documenting the steps taken in preparation for properly monitoring and testing for E. coli including, but not limited to, selected test method and location of sampling.</p>	05/21/2026
<p>Operational Evaluation Report: The permittee shall prepare and submit an Operational Evaluation Report to the Department for review and approval. The report shall include an evaluation of collected effluent data and proposed operational improvements that will optimize efficacy of disinfection at the treatment plant during the period prior to complying with final E. coli limitations and, to the extent possible, enable compliance with the final E. coli limitations. The report shall include a plan and schedule for implementation of the operational improvements. These improvements shall occur as soon as possible, but not later than 04/30/2027. The report shall state whether the operational improvements are expected to result in compliance with the final E. coli limitations.</p> <p>The permittee shall implement the operational improvements in accordance with the approved plan and schedule specified in the Operational Evaluation Report and in no case later than 04/30/2027.</p> <p>If the Operational Evaluation Report concludes that the operational improvements are expected to result in compliance with the final E. coli limitations, the permittee shall comply with the final E. coli limitations by 04/30/2027 and the permittee is not required to comply with subsequent milestones identified below in this compliance schedule ('Submit Facility Plan', 'Final Plans and Specifications', 'Treatment Plant Upgrade to Meet Limitations', 'Construction Upgrade Progress Report', 'Complete Construction', 'Achieve Compliance').</p> <p>FACILITY PLAN - If the Operational Evaluation Report concludes that operational improvements alone are not expected to result in compliance with the final E. coli limitations, the permittee shall initiate development of a facility plan for meeting final E. coli limitations and comply with the remaining required actions in this schedule of compliance.</p> <p>If the Department disagrees with the conclusion of the report and determines that the permittee can achieve final E. coli limitations using the existing treatment system with only operational improvements, the Department may reopen and modify the permit to include an implementation schedule for achieving the final E. coli limitations sooner than 04/30/2030.</p>	11/30/2026
<p>Submit Facility Plan: If the Operational Evaluation Report concluded that the permittee cannot achieve final E. coli limitations with operational improvements alone, the permittee shall submit a Facility Plan per s. NR 110.09, Wis. Adm. Code. The permittee may submit an abbreviated facility plan if the Department determines that the modifications are minor.</p>	04/30/2027
<p>Final Plans and Specifications: The permittee shall submit final construction plans to the Department for approval pursuant to ch. NR 108, Wis. Adm. Code, specifying treatment plant upgrades that must be constructed to achieve compliance with final E. coli limitations and a schedule for completing construction of the upgrades by the complete construction date specified below.</p>	03/31/2028
<p>Treatment Plant Upgrade to Meet Limitations: The permittee shall initiate bidding, procurement, and/or construction of the project. The permittee shall obtain approval of the final construction plans</p>	09/30/2028

and schedule from the Department pursuant to s. 281.41, Stats., prior to initiating activities defined as construction under ch. NR 108, Wis. Adm. Code. Upon approval of the final construction plans and schedule by the Department pursuant to s. 281.41, Stats., the permittee shall construct the treatment plant upgrades in accordance with the approved plans and specifications.	
Construction Upgrade Progress Report: The permittee shall submit a progress report on construction upgrades.	09/30/2029
Complete Construction: The permittee shall complete construction of wastewater treatment system upgrades.	03/31/2030
Achieve Compliance: The permittee shall achieve compliance with final E. coli limitations.	04/30/2030

4.1.1 Explanation of Schedule

E. coli- A compliance schedule is included in the permit to provide time for the permittee to investigate options for meeting new effluent E. coli water quality-based effluent limits while coming into compliance with the limits as soon as reasonably possible.

4.2 Phosphorus Schedule - Optimization and Compliance Planning

The permittee is required to optimize performance and undertake compliance planning to control phosphorus discharges per the following schedule.

Required Action	Due Date
<p>Optimization and Compliance Alternatives: The permittee shall implement a phosphorus discharge optimization plan to control phosphorus discharges to the greatest extent practicable. Submit a progress report that summarizes the approach to phosphorus removal at the facility, the resulting concentration and mass loading for the last 12-month period, and any changes that were or are needed to optimize removal of phosphorus by the due date.</p> <p>The permittee shall also evaluate alternative phosphorus compliance options such as water quality trading and adaptive management. The progress report submitted on the date due shall also detail any outreach activities undertaken to evaluate these options, any communications with credit generators, brokers/clearinghouse, and any potential water quality trading or adaptive management projects that may lead to compliance with phosphorus WQBELs.</p> <p>Financial alternatives evaluation: If the permittee intends to seek a renewed variance at the end of this permit term, the permittee may complete a financial evaluation to support ongoing variance eligibility. The report must evaluate financial mechanisms that have the potential to make compliance with phosphorus WQBELs economically feasible. Include an assessment of the feasibility and financial outcomes of the following opportunities: variable rate structures, grants through USDA or other sources, and DNR’s Clean Water Fund Program. The assessment of the DNR’s Clean Water Fund program should take into account subsidized interest rate loans, principal forgiveness, and other options as outlined in EPA’s March 2024 Financial Capabilities Assessment Guidance, Appendix C.</p>	03/31/2027
Progress Report #2: Submit a progress report per the above for the prior calendar year.	03/31/2028
Progress Report #3: Submit a progress report per the above for the prior calendar year.	03/31/2029
Progress Report #4: Submit a progress report per the above for the prior calendar year.	03/31/2030

<p>Final MDV Optimization and Compliance Alternatives Report: Submit a progress report per the above for the prior calendar year.</p> <p>If water quality trading or adaptive management will be used to comply with phosphorus limitations during the next permit term, submit a draft water quality trading plan, adaptive management plan, or executed clearinghouse credit purchase agreement.</p> <p>The financial alternatives evaluation as described above must be submitted by the date due if the facility chooses to seek renewal of the variance.</p>	03/31/2031
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4.2.1 Explanation of Schedule

Optimization and Compliance Planning- 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 applicable effluent limits. This compliance schedule requires the permittee to prepare an optimization plan with a schedule for implementation and submit it for Department approval. The schedule also includes a compliance planning element focused on economically feasible solutions to low-level phosphorus effluent limits such as water quality trading or adaptive management. The permittee shall take the steps called for in the optimization plan and submit annual progress reports on optimizing the removal of phosphorus and establishing a water quality trade or adaptive management project. Should the permittee intend to reapply for a subsequent term of variance coverage, a financial alternatives analysis will need to be completed. Report elements are listed in the schedule, and more information can be found in EPA’s March 2024 Financial Capabilities Assessment Guidance, Appendix C.

4.3 Phosphorus Payment per Pound to County

The permittee is required to make annual payments for phosphorus reductions to the participating county or counties in accordance with s. 283.16(8), Wis. Stats, and the following schedule. The price per pound will be set at the time of permit reissuance and will apply for the duration of the permit.

Required Action	Due Date
<p>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 (\$68.40 per pound)] or \$640,000, whichever is less. See the payment calculation steps in the Surface Water section.</p> <p>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.</p> <p>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.</p>	03/01/2027
<p>Annual Verification of Payment #2: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.</p>	03/01/2028
<p>Annual Verification of Payment #3: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.</p>	03/01/2029
<p>Annual Verification of Payment #4: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.</p>	03/01/2030

Annual Verification of Payment #5: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2031
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.	

4.3.1 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 nonpoint 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 based on 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 \$66.62 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).

4.4 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.	03/31/2027
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.	09/30/2027
Initiate Actions: Initiate actions identified in the plan.	03/31/2028
Complete Actions: Complete actions identified in the plan and achieve compliance with the specified interim effluent limit.	03/31/2029

4.4.1 Explanation of Schedule

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 three years to comply with that limit.

Other Comments

TBD

Attachments

Water Quality Based Effluent Limits memo dated December 16, 2025, from Benjamin Hartenbower to Angela Parkhurst and titled "Water Quality Based Effluent Limitations for the Junction City WPDES Permit No. WI-0028070

Public Notice - Stevens Point Journal, PO Box 7, Stevens Point, WI 54481-0007

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: February 9, 2026