Permit Fact Sheet

** The permit was modified to remove the temperature limitation and schedule. Changes associated with the modification are highlighted in gray **

General Information

Permit Number	WI-0050784-09-1
Permittee Name and Address	KENOSHA BEEF INTERNATIONAL BOX 639, KENOSHA, WI 53140
Permitted Facility Name and Address	Kenosha Beef International 3111 152nd Ave(Co Hwy MB) 3500 feet north of MB&Hwy N
Permit Term	October 01, 2026 to March 31, 2029
Discharge Location	NW ¼ of the NW ¼ of Section 26, T2N R12E, Town of Paris, Kenosha County located at 3111 152nd (Hwy MB) approximately 3,200 feet northeast of the intersection of Hwy MB and N. Coordinates: 42.612560, -87.987619
Receiving Water	via the Root river tributary of Desplaines River in Des Plaines River Watershed of Fox (IL) River Basin in Kenosha County
Stream Flow ($Q_{7,10}$)	0 cfs
Stream Classification	Limited Aquatic Life Community, non-public water supply.
Discharge Type	Existing and Continuous

Facility Description

Kenosha Beef International processes and packages branded and private-labeled raw, frozen, and fully cooked beef and pork products. The processing plant runs 7 days a week, 24 hours a day with cleaning processes for approximately 8 hours a day. Employee sanitary wastes are being treated at the facility. No new production lines have been installed in the last permit term. Kenosha Beef is an industrial treatment plant and categorical (technology based) limits are required based on both State and Federal regulations. These categorical limits are based on production rates and any new production lines are considered in determining these limitations. The new source date for the Meat Cutter category is September 1, 2023.

Process wastewaters initially enter four flow equalization tanks from which they are sent through a plug flow reactor which mixes polymer into the wastewater system. The wastewater then passes through a dissolved air flotation (DAF) unit which removes suspended solids that are stored in a DAF sludge storage tank and disposed of at an off-site location. The effluent from the DAF unit is conveyed via a lift station to a series of two covered anaerobic lagoons followed by a series of two aerobic lagoons. From the second aerobic lagoon the wastewater is passed through a sand filter for ammonia removal, a plug flow reactor which mixes additional polymers, a 2nd DAF unit, a triple cell sand filter, a submerged attached growth reactor (SAGR), a double cell sand filter and finally an ultraviolet filter prior to discharge to the waterway.

Sludge from the two DAF units is stored in a Sludge Storage tank and then either hauled to another facility or may be land applied under this permit. Sludge accumulation in the anaerobic lagoons is not anticipated during the proposed permit term. There is minimal sludge in the aerated lagoons that would be cleaned out by a licensed waste hauler after they are drawn down. In this permit term, sludge outfalls 004, 005, 006 and 007 will remain inactive and there are no plans for desludging the lagoons. If during the permit term it becomes necessary to desludge and land apply from the four lagoons, the permittee shall contact the Department to activate the outfall and sampling will be required at that time.

Substantial Compliance Determination

Enforcement During Last Permit: No formal enforcement was taken during the last permit term.

After a desk top review of all discharge monitoring reports, CMARs, land app reports, compliance schedule items, and a site visit on July 31, 2023, this facility has been found to be in substantial compliance with their current permit.

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)**
002	0.045 MGD (2022)	Effluent: Grab and 24-Hr flow proportional composite samples collected at discharge from treatment system after UV disinfection. Temperature shall be monitored after UV disinfection or at the outfall structure prior to the receiving water. Flow meter located at the end of the triple-cell sand filter before UV disinfection.
003	474,000 gallons (2022)	Land Application: Discharge consists of liquid sludge from the two DAF Units stored in DAF Sludge Tank. Representative sample shall be taken from the mixed DAF Sludge Tank prior to Land Application.
004		Land Application: Industrial liquid sludge removed from Aerobic Lagoon 1. Representative sample taken prior to land application. OUTFALL INACTIVE: DEPARTMENT APPROVAL TO ACTIVATE MUST BE RECEIVED PRIOR TO USE.
005		Land Application: Industrial liquid sludge removed from Aerobic Lagoon 2. Representative sample taken prior to land application. OUTFALL INACTIVE: DEPARTMENT APPROVAL TO ACTIVATE MUST BE RECEIVED PRIOR TO USE.
006		Land Application: Industrial liquid sludge removed from Anaerobic Lagoon 1. Representative sample taken prior to land application. OUTFALL INACTIVE: DEPARTMENT APPROVAL TO ACTIVATE MUST BE RECEIVED PRIOR TO USE.
007		Land Application: Industrial liquid sludge removed from Anaerobic Lagoon 2. Representative sample taken prior to land application. OUTFALL INACTIVE: DEPARTMENT APPROVAL TO ACTIVATE MUST BE RECEIVED PRIOR TO USE.

Permit Requirements

1 Surface Water - Monitoring and Limitations

1.1 Sample Point Number: 002- TREATED EFFLUENT

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Daily Max	40 mg/L	2/Week	Grab	
BOD5, Total	Monthly Avg	20 mg/L	2/Week	Grab	
BOD5, Total	Daily Max	30.6 lbs/day	2/Week	Calculated	
BOD5, Total	Monthly Avg	15.3 lbs/day	2/Week	Calculated	
Suspended Solids, Total	Daily Max	40 mg/L	2/Week	Grab	
Suspended Solids, Total	Monthly Avg	20 mg/L	2/Week	Grab	
Suspended Solids, Total	Daily Max	37.4 lbs/day	2/Week	Calculated	
Suspended Solids, Total	Monthly Avg	18.7 lbs/day	2/Week	Calculated	
Oil & Grease (Hexane)		mg/L	2/Week	Grab	
Oil & Grease (Hexane)	Daily Max	10.2 lbs/day	2/Week	Calculated	
Oil & Grease (Hexane)	Monthly Avg	5.1 lbs/day	2/Week	Calculated	
Nitrogen, Ammonia (NH3-N) Total	Daily Max	8.0 mg/L	2/Week	Grab	
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	4.7 mg/L	2/Week	Grab	April through May and October
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	4.1 mg/L	2/Week	Grab	June through September
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	3.3 mg/L	2/Week	Grab	November through March
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	1.9 mg/L	2/Week	Grab	April through May and October

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	1.6 mg/L	2/Week	Grab	June through September
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	1.3 mg/L	2/Week	Grab	November through March
Nitrogen, Total	Daily Max	194 mg/L	Monthly	Grab	
Nitrogen, Total	Monthly Avg	134 mg/L	Monthly	Grab	
pH Field	Daily Min	6.0 su	3/Week	Grab	
pH Field	Daily Max	9.0 su	3/Week	Grab	
Dissolved Oxygen	Daily Min	4.0 mg/L	3/Week	Grab	
Chlorine, Total Residual	Daily Max	19 ug/L	3/Week	Grab	
Chlorine, Total Residual	Monthly Avg	7.3 ug/L	3/Week	Grab	
Chlorine, Total Residual	Weekly Avg	7.3 ug/L	3/Week	Grab	
Phosphorus, Total	Monthly Avg	0.225 mg/L	2/Week	Grab	
Phosphorus, Total	6-Month Avg	0.075 mg/L	2/Week	Grab	The six-month average shall be averaged during the months of May through October and November through April.
Phosphorus, Total	6-Month Avg	0.037 lbs/day	2/Week	Calculated	Calculate the daily mass discharge of the phosphorus in lbs/day on the same days phosphorus sampling occurs. Six-month average shall be averaged during the months of May through October and November - April.
Fecal Coliform	Daily Max	400 #/100 ml	2/Week	Grab	Technology Based Limit effective year-round and will be retained.
Fecal Coliform	Geometric Mean - Monthly	400 #/100 ml	2/Week	Grab	Limit effective May through September annually until the final E. coli 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	2/Week	Grab	Limit Effective May through September annually per the Effluent Limitations for E. coli Schedule.
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit Effective May through 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.
Chloride		mg/L	Monthly	Grab	Monitoring in 2027.
Arsenic, Total Recoverable		ug/L	Once	Grab	Monitor once in 2027 using an LOD lower than 8 µg/L.
Cadmium, Total Recoverable		ug/L	Once	Grab	Monitor once in 2027 using an LOD lower than 0.51 µg/L.
Lead, Total Recoverable		ug/L	Once	Grab	Monitor once in 2027 using an LOD lower than 5.8 µg/L.
Acute WET	Daily Max	1.0 TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	Sample annually in rotating quarters, and concurrently with chemical-specific toxic substances. See Whole Effluent Toxicity (WET) Testing section.
Chronic WET	Monthly Avg	1.0 TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	Sample annually in rotating quarters, and concurrently with chemical-specific toxic substances. See Whole Effluent Toxicity (WET) Testing section.

1.1.1 Changes from Previous Permit

Monitoring for **Copper; Zinc** and **Hardness** were removed from the permit.

Ammonia Nitrogen: Technology Based Daily Max limit changed.

pH, Dissolved Oxygen and Chlorine: Sampling frequency updated to 3/week.

Phosphorus: 6-month average mass limits changed.

Fecal Coliform (Daily Max): A year-round daily max limit of 400 CFU/100ml was added to the permit to conform with technology based effluent limitations. This limit will be retained.

Fecal Coliform (Geometric Mean-Monthly): The WQBEL monthly geometric mean of 400 CFU/100ml will be replaced by E.coli as the indicator organism per the schedule in the permit.

E.coli: 2/week monitoring-only for E.coli as the indicator organism for pathogens has been added to the permit during the recreational period preceding the effective date of the E.coli limit.

E.coli (geometric mean-monthly; % exceedance): Monthly calculation has been added limit of 126#/100 mL has been added to the permit. Monthly calculation and a limit of 10 percent of samples exceeding 126#/100 mL (% exceedance) has been added to the permit.
Fecal coliform monitoring and limits have been replaced with Escherichia coli (E. coli) monitoring and limits. E. coli monitoring is required at the permit effective date. An interim fecal coliform limit of 400 #/100 ml as a monthly geometric mean will apply from the permit effective date through the end of a compliance schedule. 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.

Chloride: Monitoring January 1 through December 31, 2027, was added to the permit.

Arsenic, Cadmium; Lead: Sampling once in 2027 was added to the permit. Each parameter has a specified LOD that should be used when sampling. See parameter table note above and WQBEL for more information.

Temperature: Monitoring year-round with limit effective in June starting in 2029 per the Temperature Schedule was removed from the permit.

Acute Whole Effluent Toxicity (WET) and **Chronic WET testing**: Limits added for both Acute and Chronic WET testing.

1.1.2 Explanation of Limits and Monitoring Requirements

Categorical Limits: Refer to the Technology Based Effluent Limitations (TBELs) memo for Kenosha Beef prepared by Nicole Krueger dated September 22, 2023, used for this reissuance.

BOD_5, TSS, Oil and Grease, pH, Total Nitrogen: The process wastewater effluent limits for BOD_5, TSS, Oil & Grease, pH, and Total Nitrogen are retained from the previous permit. Those limits are based on effluent limit guidelines in 40 CFR Part 432 Subpart F treatment standards for the category of "Meat Cutters". In accordance with ch. NR 220, Wis. Adm. Code., the Department has implemented effluent guidelines from the newest federal regulations as these standards were not promulgated into Department standards of ch. NR 258, Wis. Adm. Code. Total Nitrogen limit of 134 mg/L monthly average deviates from the WQBEL memo because of a typographical error.

Ammonia Nitrogen: The daily maximum categorical limits are more stringent than the daily maximum WQBELs therefore the daily maximum categorical limit was added to the current permit.

Phosphorus: Subchapter II of Chapter NR 217, Wis. Adm. Code, requires industrial facilities that discharge greater than 60 pounds of Total Phosphorus per month to comply with a monthly average limit of 1.0 mg/L, or an approved alternative concentration limit. Because Kenosha Beef currently has a monthly limit of 0.225 mg/L, this limit should be included in the reissued permit.

Fecal Coliform: Kenosha Beef processes both production and employee sanitary waste at an on-site WWTP. Therefore, a monthly geometric mean of 400 CFU/ 100 ml applies in accordance with s. NR 102.04(6), Wis. Adm. Code. This water quality-based limit requires seasonal disinfection from May 1st through September 30th to protect recreational uses of the Root River. Additionally, 40 CFR Part 432 Subpart F specifies a year-round daily maximum categorical effluent limit of 400 CFU /100 ml. However, the previous permit term did not include the year-round categorical limit on the basis that no harvesting of animals occurs at the site. The Department revisited this determination, and in doing so, reviewed fecal coliform categorical limits for all sectors under 40 CFR Part 432 (Subparts A through L). All subparts include the daily maximum best practicable control technology (BPT) limits for fecal coliform independent of whether harvesting occurs on site. Thus, the daily max TBEL fecal coliform BPT limits are extended beyond the recreation season to year-round in the permit. This limit will be retained in addition to the *E. coli* water quality-based limitations.

Water Quality Based Limits and WET Requirements and Disinfection

Ammonia Nitrogen: 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 daily maximum categorical limits are more stringent than the daily maximum WQBELs therefore the daily maximum categorical limit was added to the current permit.

Chlorine: Sections NR 106.07(4) and NR 205.067(7), Wis. Adm. Code require WPDES permits contain daily maximum and monthly average limitations for industrial dischargers whenever practicable and necessary to protect water quality. Therefore, a monthly average limit of 7.3 µg/L, equal to the weekly average limit, is retained in current permit to meet expression of limits requirements in addition to the daily max and weekly average limits.

Phosphorus: Phosphorus requirements are based on the Phosphorus Rules that became effective 12/1/2010 as detailed in NR 102 Water Quality Standards and NR 217 Effluent Standards and Limitations for Phosphorus. Chapter NR 217 of the Wis. Adm. Code addresses point source dischargers of phosphorus to surface waters. The code categorically limits industrial dischargers of more than 60 pounds of phosphorus per month and municipal dischargers of more than 150 pounds of phosphorus per month to 1.0 mg/L unless an alternative limit is approved. NR 217 also specifies WQBELs for discharges of phosphorus to surface waters of the state from publicly and privately owned wastewater facilities, noncontact cooling water discharges which contain phosphorus, concentrated animal feeding operations that discharge through alternative treatment facilities and a facility/site that is regulated under NR 216 where the standards in NR151 and 216 are not sufficient to meet phosphorus criteria. WQBELs for phosphorus are needed whenever the discharge contains phosphorus at concentrations or loadings that will cause or contribute to an exceedance of the water quality standards.

- **Limit Expression:** According to s. NR 217.14(2), Wis. Adm. Code, because the calculated WQBEL is less than or equal to 0.3 mg/L, the effluent limit of 0.075 mg/L may be expressed as a six-month average. If a concentration limitation expressed as a six-month average is included in the permit, a monthly average concentration limitation of 0.225 mg/L, equal to three times the WQBEL calculated under s. NR 217.13, Wis. Adm. Code shall also be included in the permit. The six-month average should be averaged during the months of May – October and November – April.
- **Mass Limits:** A mass limit is also required, pursuant to s. NR 217.14(1)(a), Wis. Adm. Code, because the discharge is to a surface water that is to or upstream of a phosphorus impaired stream. This final mass limit shall be 0.075 mg/L × 8.34 × 0.059 MGD = 0.037 lbs/day expressed as a six-month average.
- **TMDL Under Development:** A Total Maximum Daily Load (TMDL) is being developed for the Fox (IL) River Basin for phosphorus. The TMDL will address phosphorus water quality impairments within the basins and provide waste load allocations (WLA) required to meet water quality standards. This TMDL will likely result in phosphorus limitations that must be included in WPDES permits, which may be different than those calculated in this WQBEL memo. TMDL-derived phosphorus limits may be included in lieu of or in addition to the calculated limits upon permit reissuance or modification once the TMDL has been approved by U.S. EPA, according to s. NR 217.16, Wis. Adm. Code.

Fecal Coliform: The daily maximum fecal coliform limit will continue to be effective year-round after the *E. coli* limits become effective. The daily fecal coliform limit is recommended to continue beyond the effective date of the *E. coli* limits because Kenosha Beef is subject to the requirements in NR 258 Wis. Adm. Code for meat processors.

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. As Kenosha Beef treats employee sanitary waste domestic, these requirements apply. Monitoring at the same frequency as fecal coliform is included in the permit. At the time of permit development, there was no effluent E.Coli data to determine if the facility could meet the limit. A compliance schedule is included in the permit to allow for data collection and during which an interim limit is in effect to prevent backsliding from treatment levels currently achievable.

Chloride: Acute and chronic chloride toxicity criteria for the protection of aquatic life are included in Tables 1 and 5 of ch. NR 105, Wis. Adm. Code. Subchapter VII of ch. NR 106 establishes the procedure for calculating water quality based effluent limitations (WQBELs) for chloride. Monitoring in 2027 was added to the permit to ensure 11 sample results are available at the next permit issuance to meet the data requirements of s. NR 106.85, Wis. Adm. Code.

Arsenic, Cadmium; Lead: Sampling once in 2027 was added to the permit. Each parameter has a specified LOD that should be used when sampling.

Temperature: Surface water quality standards for temperature took effect on October 1, 2010. These regulations are detailed in Chapters NR 102 (Subchapter II – Water Quality Standards for Temperature) and NR 106 (Subchapter V – Effluent Limitations for Temperature) of the Wisconsin Administrative Code. The daily maximum effluent temperature limitation shall be 86 °F for discharges to surface waters classified as Limited Aquatic Life according to s. NR 104.02(3)(b)1, Wis. Adm. Code. The need for a Temperature limit was reevaluated. A more representative data set for effluent temperature was collected. The new data set was evaluated and showed no reasonable potential for the discharge to exceed 86°F. Therefore, the daily maximum temperature limit and Temperature Schedule were removed from the permit. Temperature monitoring is no longer required as part of the permit. Temperature monitoring may be required in future permit reissuances to ensure no further monitoring or limitations are required.

Whole Effluent Toxicity: Whole effluent toxicity (WET) testing requirements and limits 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).

PFOS and PFOA: NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Pursuant to s. NR 106.98(3)(b), Wis. Adm. Code, the department evaluated the need for PFOS and PFOA monitoring. Based on information available at the time the proposed permit was drafted, the department has determined the permittee does not need to sample the effluent for PFOS or PFOA as part of this permit reissuance. The department may re-evaluate the need for sampling at the next permit reissuance if new information becomes available that suggests PFOS or PFOA may be present in the discharge.

Industrial Effluent Limits: Chapter NR 258, Wis. Adm. Code, specifies effluent guidelines for discharges from meat and poultry product categories of point sources and subcategories. Kenosha Beef would fall under the ”Meat Cutters” subcategory as defined in s. NR 258.02, Wis. Adm. Code. These guidelines are based on federal effluent guidelines in 40 CFR Part 432 Subpart F.

Monitoring Frequency Evaluation: Monitoring frequencies for parameters that have final effluent limits in effect during this permit term were evaluated taking into consideration the size and type of the facility, and whether the monitoring occurs frequently enough to characterize effluent quality and variability, to detect events of noncompliance, and to ensure

fairness and consistency in permits issued across the state. Monitoring frequency decisions are based on requirements in s. NR 205.066(1), Wis. Adm. Code, (decisions are case-by-case) and considering the factors in s. NR 210.04 (a) through (e), Wis. Adm. Code, along with recommendations provided in the Monitoring Frequencies for Individual Wastewater Permits guidance (April 12, 2021). The department has determined at this time that an increase in monitoring frequency for Dissolved Oxygen, Chlorine and pH Field to 3/Week is appropriate to be consistent with facilities of similar size and effluent quality across the state.

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

2.1 Sample Point Number: 003- DAF Unit Sludge

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Annual	Grab	
Nitrogen, Total Kjeldahl		Percent	Annual	Grab	
Chloride		Percent	Annual	Grab	
pH Field		su	Annual	Grab	
Nitrogen, Ammonium (NH4-N) Total		Percent	Annual	Grab	
Phosphorus, Total		Percent	Annual	Grab	
Potassium, Total Recoverable		Percent	Annual	Grab	
Phosphorus, Water Extractable		Percent	Annual	Grab	
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.

2.1.1 Changes from Previous Permit:

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

2.1.2 Explanation of Limits and Monitoring Requirements

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

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA has developed a draft risk assessment to determine future land application rates and released this risk assessment in January of 2025. The department is evaluating this new information. Until a decision is made, the "Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS" should be followed.

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

2.2 Sample Point Number: 004- Lagoon Ae-1 Sludge; 005- Lagoon Ae-2 Sludge; 006- Lagoon An-1 Sludge, and 007- Lagoon An-2 Sludge

Sample points 004, 005, 006 and 007 are inactivated and there are no plans to desludge lagoons in this permit term. If it becomes necessary to desludge during the permit term, the permittee shall contact the Department to activate the outfall and sampling will be required at that time.

3 Schedules

3.1 Effluent Limitations for E. coli

Required Action	Due Date
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.	05/21/2024
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 April 30, 2025. The report shall state whether the operational improvements are expected to result in compliance with the final E. coli limitations. 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 April 30, 2025. 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 April 30, 2025 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').	11/30/2024

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. 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 April 30, 2028.	
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.	04/30/2025
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.	03/31/2026
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 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.	09/30/2026
Construction Upgrade Progress Report: The permittee shall submit a progress report on construction upgrades.	09/30/2027
Complete Construction: The permittee shall complete construction of wastewater treatment system upgrades.	03/31/2028
Achieve Compliance: The permittee shall achieve compliance with final E. coli limitations.	04/30/2028

3.1.1 Explanation of Schedule

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.

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Marissa Fleege Wastewater Specialist **Date:** 6/18/2026