Permit Fact Sheet

General Information

Permit Number	WI-0031364-09-0
Permittee Name and Address	LEBANON SANITARY DISTRICT #1 P O Box 116, Lebanon, WI 53047
Permitted Facility Name and Address	Lebanon Sanitary District #1 WWTF N1550 TWAIN ROAD, SEQ, NEQ, SEC 17, T9N, R16E, LEBANON TWP, LEBANON, WISCONSIN
Permit Term	April 01, 2026 to March 31, 2031
Discharge Location	SE ¼ of the NE ¼, Section 17, T9N R16E
Receiving Water	Unnamed Tributary of Baker Creek (Sinissippi Lake Watershed, UR08 – Upper Rock River Basin) in Dodge County
Stream Flow ($Q_{7,10}$)	Low flow for the tributary is not available and assumed to be 0 cfs. Approximately 1.2 miles downstream at Baker Creek – 0.17 cfs
Stream Classification	Limited Aquatic Life (LAL), non-public water supply
Discharge Type	Existing, Seasonal (April – December)
Annual Average Design Flow (MGD)	0.047 MGD
Industrial or Commercial Contributors	None
Plant Classification	A3 - Recirculating Media Filters; A4 - Ponds, Lagoons and Natural Systems; P - Total Phosphorus; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

Lebanon Sanitary District #1 is a covered three-pond lagoon system followed by a recirculating sand filter. A facility upgrade was completed in 2025 including installation of headworks, cover and baffling on the final lagoon, a permanent chemical feed system, and replacement of the RSF media. Influent wastewater enters the facility through the influent grinder pump station where flow is measured and dosed with phosphorus treatment chemical. Flow passes through the three stabilization lagoons in series where BOD, TSS, and phosphorus is reduced before entering the RSF dosing chamber where flow is recirculated for additional biological treatment prior to metering and discharge to the unnamed tributary to Baker Creek. Discharge from the facility normally occurs April through December and will stop discharging to comply with limits if effluent quality is poor.

Substantial Compliance Determination

Enforcement During Last Permit: A notice of noncompliance (NON) was issued in September 2023 for construction related exceedance throughout that year (March – July 2023). There have been intermittent total phosphorus and total suspended solids limit exceedances. The facility has completed all previously required actions as part of the enforcement process.

After a desk top review of all discharge monitoring reports, CMARs, land application reports, compliance schedule items, and a site visit on June 07, 2024, 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)**
701	0.02 MGD (2024)	Influent: 24-hour flow proportional composite sampler and influent magnetic flow meter located at the influent grinder pump vault.
003	0.03 MGD (2024)	Effluent: 24-hour flow proportional composite sampler located at the effluent flume east of the dosing chamber under the building canopy prior to discharge to an unnamed tributary of Baker Creek. Effluent flow is a calculated value based on a series of weir structures at the RSF discharge.
002	Lagoon Sludge Removed Fall of 2025 429,000 gallons	Representative composite grab lagoon sludge samples shall be taken from lagoon one. If a lagoon is scheduled for desludging, a composite grab sample of just that lagoon sludge may be needed prior to land spreading.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- INFLUENT

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total		mg/L	2/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	2/Week	24-Hr Flow Prop Comp	

Changes from Previous Permit:

Influent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit.

Flow: Sample frequency has changed to "Daily" for eDMR reporting purposes.

BOD and TSS: Sample frequency increased from "1/ 2 Weeks" to "2/Week".

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: 003- Sand Filter Effluent

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate	Monthly Avg	0.048 MGD	Daily	Measure	Flow reading is based on how many weirs are open in the effluent box at one time, associated with a specific calculated volume flow.
BOD5, Total	Weekly Avg	30 mg/L	2/Week	24-Hr Flow Prop Comp	
BOD5, Total	Monthly Avg	20 mg/L	2/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	30 mg/L	2/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	20 mg/L	2/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	3.9 lbs/day	2/Week	Calculated	January, March, May, July, August, October, and December
Suspended Solids, Total	Weekly Avg	4.3 lbs/day	2/Week	Calculated	February
Suspended Solids, Total	Weekly Avg	4.0 lbs/day	2/Week	Calculated	April, June, September, and November
Suspended Solids, Total	Monthly Avg	2.6 lbs/day	2/Week	Calculated	January, March, May, July, August, October, and December
Suspended Solids, Total	Monthly Avg	2.9 lbs/day	2/Week	Calculated	February

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Suspended Solids, Total	Monthly Avg	2.7 lbs/day	2/Week	Calculated	April, June, September, and November
pH Field	Daily Min	6.0 su	5/Week	Grab	
pH Field	Daily Max	9.0 su	5/Week	Grab	
Dissolved Oxygen	Daily Min	4.0 mg/L	5/Week	Grab	
Nitrogen, Ammonia Variable Limit		mg/L	2/Week	24-Hr Flow Prop Comp	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.
Nitrogen, Ammonia (NH3-N) Total	Daily Max - Variable	mg/L	2/Week	24-Hr Flow Prop Comp	Report the daily maximum Ammonia result in the Nitrogen, Ammonia (NH3-N) Total column of the eDMR. See Ammonia Limitation section.
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	19 mg/L	2/Week	24-Hr Flow Prop Comp	April and May
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	8.7 mg/L	2/Week	24-Hr Flow Prop Comp	June-September
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	26 mg/L	2/Week	24-Hr Flow Prop Comp	October-March
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	13 mg/L	2/Week	24-Hr Flow Prop Comp	April
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	10 mg/L	2/Week	24-Hr Flow Prop Comp	May
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	5.9 mg/L	2/Week	24-Hr Flow Prop Comp	June-September
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	16 mg/L	2/Week	24-Hr Flow Prop Comp	October
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	18 mg/L	2/Week	24-Hr Flow Prop Comp	November-March
Chloride		mg/L	4/Month	24-Hr Flow Prop Comp	Sampling shall be done on four consecutive days one week per month during calendar year 2029.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
E. coli		#/100 ml	Weekly	Grab	Monitoring May - September 2029
Phosphorus, Total	Monthly Avg	1.0 mg/L	2/Week	24-Hr Flow Prop Comp	This is an interim MDV limit effective through March 31, 2028. See the MDV/Phosphorus sections and phosphorus schedules.
Phosphorus, Total	Monthly Avg	0.6 mg/L	2/Week	24-Hr Flow Prop Comp	This is an interim MDV limit effective on April 1, 2028. See the MDV/Phosphorus sections and phosphorus schedules.
Phosphorus, Total	Monthly Avg	0.27 lbs/day	2/Week	Calculated	January
Phosphorus, Total	Monthly Avg	0.36 lbs/day	2/Week	Calculated	February
Phosphorus, Total	Monthly Avg	0.28 lbs/day	2/Week	Calculated	March
Phosphorus, Total	Monthly Avg	0.22 lbs/day	2/Week	Calculated	April
Phosphorus, Total	Monthly Avg	0.19 lbs/day	2/Week	Calculated	May, September, and October
Phosphorus, Total	Monthly Avg	0.17 lbs/day	2/Week	Calculated	June-August
Phosphorus, Total	Monthly Avg	0.2 lbs/day	2/Week	Calculated	November
Phosphorus, Total	Monthly Avg	0.23 lbs/day	2/Week	Calculated	December
Phosphorus, Total		lbs/month	Monthly	Calculated	Report the monthly phosphorus discharged in lbs/month on the last day of the month on the DMR. See Standard Requirement '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 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 rotating quarters. See Nitrogen Series Monitoring section.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Series

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					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.
Temperature Maximum		deg F	Daily	Continuous	Monitoring in 2029.

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.

Flow: The sample frequency and sample type have changed to "Daily" and "Measure", respectively, for eDMR reporting purposes.

BOD, TSS, Ammonia, Phosphorus: The sample frequency has increased from "Weekly" to "2/Week".

DO: The sample frequency has changed from "2/Week" to "5/Week".

pH: Monitoring and limits for pH are included in the permit. Sample frequency is "5/Week".

Chloride: The sample frequency has changed from "Monthly" to "4/Month".

E. coli: Weekly monitoring during the disinfection season (May – September) in 2030 has been included in the permit.

Phosphorus MDV: The permittee has applied for a multi-discharger variance (MDV) for phosphorus for this permit term and the application has been approved by the Department. An MDV interim limit of 0.6 mg/L has been added that goes into effect per a compliance schedule. 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 $68.40 per pound of phosphorus discharged during the previous year in excess of the target value of 0.2 mg/L.

Total Nitrogen Monitoring (TKN, N02+N03 and Total N): Annual monitoring is required in specific quarters as outlined in the permit.

Temperature: The sample frequency has changed from "3/Week" to "Daily".

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) for the Lebanon Sanitary District #1 memo, prepared by Zainah Masri, dated September 5, 2025, updated January 23, 2026, and used for this reissuance.

Flow: As an intermittent/seasonal discharger a flow rate limit is included to prevent overloading of the RFS and excessive volume discharger during warmer months. 0.048 MGD as a monthly average was included in the -08 reissuance Fact Sheet but omitted from the current permit in error. The flow rate limit is included in the reissued permit to continue preventing hydraulic and organic overloading of the RSF.

pH: Permit issuance -08 erroneously omitted pH monitoring and limits. Where the receiving water is classified as marginal surface water (Limited Aquatic Life) as defined in s. NR 104.02(3)(b), Wis. Adm. Code, the categorical limits for BOD_5, TSS, pH, and DO are those limits enumerated in ss. NR 210.05(3)(a) – (e).

E. coli: Monitoring has been included during the disinfection season of 2030, to determine reasonable potential at the next permit reissuance. The permittee should prepare to properly monitor and test for E. coli, including, but not limited to, selected test method and location of sampling. If data collected shows limits are exceeded, disinfection may be required in the future.

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 as a monthly average and 0.075 mg/L as a six-month average 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 effective interim effluent limit for total phosphorus is 1.0 mg/L as an average monthly limit. The interim limit of 0.6 mg/L as a monthly average will become effective in accordance with the 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: 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.

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 taking into consideration the presence of potential PFOS or PFOA industrial wastes, remediation sites and other potential sources of PFOS or PFOA. Based on information available at the time the proposed permit was drafted, the department has determined the permittee does not need to sample for PFOS or PFOA in the effluent 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.

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 sample frequency for BOD, TSS, Ammonia, and Phosphorus is 2/Week. The sample frequency for DO and pH is 5/Week. This sample frequency is consistent with the frequency required for stabilization pond and RSF systems. Section NR 205.066(1), Wis. Adm. Code, states that the department shall determine on a case-by-case basis the monitoring frequency to be required for each effluent limitation in a permit. The permittee has a history of effluent limit violations; therefore, more frequent monitoring is required to help establish compliance with the limitations. Monitoring

frequencies are evaluated at each permit reissuance and may be reduced at a subsequent reissuance after review of plant performance, effluent variability, compliance history, and other considerations.

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	429,000 Gallons Removed in 2025
Does sludge management demonstrate compliance? **Yes**						
Is additional sludge storage required? **No**						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? **Unknow, water supply is private wells** If yes, special monitoring and recycling conditions will be included in the permit to track any potential problems in landapplying sludge from this facility						
Is a priority pollutant scan required? **No, design flow is less than 5 MGD** Priority pollutant scans are required once every 10 years at facilities with design flows between 5 MGD and 40 MGD, and once every 5 years if design flow is greater than 40 MGD.						

3.1 Sample Point Number: 002- LAGOON SLUDGE

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

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nickel Dry Wt	High Quality	420 mg/kg	Once	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Once	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Once	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Once	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Once	Composite	
Nitrogen, Total Kjeldahl		Percent	Per Application	Composite	Once when land application occurs
Nitrogen, Ammonium (NH4-N) Total		Percent	Per Application	Composite	Once when land application occurs
Phosphorus, Total		Percent	Per Application	Composite	Once when land application occurs
Phosphorus, Water Extractable		% of Tot P	Per Application	Composite	Once when land application occurs
Potassium, Total Recoverable		Percent	Per Application	Composite	Once when land application occurs
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	
PFOA + PFOS		ug/kg	Once	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.
PFAS Dry Wt			Once	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

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.

List 2 Nutrients: The sample frequency has changed from “Once” to “Per Application”. Monitoring for list 2 (nutrients) is highly recommended at the same time as the monitoring of List 1 (metals) in year 2 of the permit (2027). Results will assist in the determination of the acres needed for land application of sludge should it be necessary. The number of acres needed is also required for the Sludge Management Schedule (see schedules for more information).

Nitrogen Organic Total: Monitoring has been removed from the permit. Reporting of this calculated value is not required on the eDMR.

PCB: Monitoring once during the permit term is included.

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

3.1.1 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.

Change in form submittal: In prior permit reissuances when it has been noted in the application that sludge would not be removed during the permit term, the department required sampling during the second year of the permit term and the sludge characteristic report (3400-049) would be generated only during that year. Due to moving to electronic submittal of forms via Switchboard, forms 3400-049 ("Characteristics Report"), 3400-052 ("Other Methods of Disposal") and 3400-055 ("Annual Land Application") will now be generated by the department and the permittee will be required to submit all three reports each year of the permit term. This change was adopted to provide the permittee flexibility because many lagoon desludging projects can be unexpected, are delayed or staggered over multiple years. Additionally, it is used to officially report that no land application of sludge has occurred, and annual submittal of the forms is required per the standard requirements section.

4 Schedules

4.1 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
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. 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. 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	03/31/2027

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.	
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
Final MDV Optimization and Compliance Alternatives Report: Submit a progress report per the above for the prior calendar year. 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. The financial alternatives evaluation as described above must be submitted by the date due if the facility chooses to seek renewal of the variance.	09/30/2030

Explanation of Schedule

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.

4.2 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 ($68.40 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.	03/01/2027

Annual Verification of Payment #2: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2028
Annual Verification of Payment #3: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2029
Annual Verification of Payment #4: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	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.	

Explanation of Schedule

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 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 $**68.40** 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).

4.3 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.	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.	06/30/2027
Initiate Actions: Initiate actions identified in the plan.	09/30/2027
Complete Actions: Complete actions identified in the plan and achieve compliance with the specified interim effluent limit.	03/31/2028

Explanation of Schedule

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 two years to comply with that limit.

4.4 Land Application Management Plan

A management plan is required for the land application system.

Required Action	Due Date
Land Application Management Plan Submittal: If the permittee proposes to land apply sludge, a management plan shall be submitted and approved by the Department. The management plan shall be consistent with the requirements of this permit, and s. NR 204.07, Wis. Adm. Code. At a minimum, the plan shall describe how the application rate has been calculated as well as how the sludge will be land applied and incorporated. Record keeping and tracking of site loadings shall also be described. Requests for land application site approvals shall also be included. The plan is due sixty (60) days prior to land applying.	

Explanation of Schedule

An up-to-date Land Application Management Plan is required that documents how the permittee will manage the land application of biosolids consistent with ch. NR 204, Wis. Adm. Code.

4.5 Desludging Management Plan

Required Action	Due Date
Desludging Management Plan Submittal: The permittee shall submit a management plan for approval if removal of sludge will occur during this permit term. At minimum, the plan shall address how the sludge will be sampled, removed, transported, and disposed of. No desludging may occur unless approval by the Department is obtained. Daily logs shall be kept that record where the sludge has been disposed. The plan is due sixty (60) days prior to desludging.	

Explanation of Schedule

If the lagoons are to be desludged during this permit term a management plan is needed to show compliance with ch. NR 204, Wis. Adm. Code. There are outlines available to assist in plan development.

Attachments

Water Quality Based Effluent Limits dated September 5, 2025, updated January 23, 2026

MDV Approval Letter dated November 7, 2025

MDV Evaluation Checklist dated November 7, 2025

Justification Of Any Waivers From Permit Application Requirements

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

Prepared By: BetsyJo Howe, Wastewater Specialist **Date:** 2/9/2026

CORRESPONDENCE/MEMORANDUM

State of Wisconsin

DATE: September 5, 2025 (1/23/2026 update w/ TMDL TSS limits explained)

TO: Jennifer Jerich–SCR/Horicon

FROM: Zainah Masri – WY/3

SUBJECT: Water Quality-Based Effluent Limitations for the Lebanon Sanitary District #1
WPDES Permit No. WI-0031364-09-0

This is in response to your request for an evaluation of the need for water quality-based effluent limitations (WQBELs) using chapters NR 102, 104, 105, 106, 207, 210, 212, and 217 of the Wisconsin Administrative Code (where applicable) for the discharge from the Lebanon Sanitary District #1 Wastewater Treatment Facility in Dodge County. This municipal wastewater treatment facility (WWTF) discharges to the Baker Creek located in the Sinissippi Lake Watershed (UR08) Watershed in the Upper Rock River Basin. This discharge is included in the Rock River Total Maximum Daily Load (TMDL) as approved by EPA on 09/28/2011.

The evaluation of the permit recommendations is discussed in more detail in the attached report.

Based on our review, the following recommendations are made on a chemical-specific basis at Outfall 003:

Parameter	Daily Maximum	Daily Minimum	Weekly Average	Monthly Average	Six-Month Average	Footnotes
Flow Rate				0.048 MGD		1,2
BOD_5			30 mg/L	20 mg/L		1
TSS			30 mg/L	20 mg/L		1,3
pH	9.0 s.u.	6.0 s.u.				1
Dissolved Oxygen		4.0 mg/L				1
Ammonia Nitrogen						4
April	Variable		19 mg/L	13 mg/L		
May	Variable		19 mg/L	10 mg/L		
June – September	Variable		8.7 mg/L	5.9 mg/L		
October	Variable		26 mg/L	16 mg/L		
November – March	Variable		26 mg/L	18 mg/L		
Chloride						1,5
E. coli						5
Phosphorus						3,6
Interim				1.0 mg/L		
MDV Interim				0.6 mg/L		
Final				0.225 mg/L	0.075 mg/L	
TKN, Nitrate+Nitrite, and Total Nitrogen						7
Temperature						1, 5

Footnotes:

1. No changes from the current permit.
2. The previous permit (-07 reissuance) public noticed in March 2014 included a daily maximum limit of 0.0473 MGD, as recommended by the compliance engineer at the time to address overloading of the RSF. In response to public comment by the facility, this daily maximum was changed to a monthly average limit of 0.048 MGD in the reissued permit. A flow rate limit of

0.048 MGD as a monthly average was included in the -08 reissuance Fact Sheet but omitted from the current permit in error. A flow rate limit of 0.048 MGD was recommended in the WQBEL memo dated April 16, 2019. The flow rate limit is recommended to continue in the reissued permit consistent with the previous permit(s).

3. Additional phosphorus and TSS mass limitations are required in accordance with the waste load allocations specified in the Rock River TMDL.

Month	Monthly Ave TSS Effluent Limit lbs/day	Weekly Ave TSS Effluent Limit lbs/day	Monthly Ave Total P Effluent Limit lbs/day
Jan	2.6	3.9	0.27
Feb	2.9	4.3	0.36
March	2.6	3.9	0.28
April	2.7	4.0	0.22
May	2.6	3.9	0.19
June	2.7	4.0	0.17
July	2.6	3.9	0.17
Aug	2.6	3.9	0.17
Sept	2.7	4.0	0.19
Oct	2.6	3.9	0.19
Nov	2.7	4.0	0.20
Dec	2.6	3.9	0.23

4. The variable daily maximum ammonia nitrogen limit table corresponding to various effluent pH values may be included in the permit in place of the single limit. These limits apply year-round.

Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L
$6.0 \leq pH \leq 6.1$	83	$7.0 < pH \leq 7.1$	51	$8.0 < pH \leq 8.1$	11
$6.1 < pH \leq 6.2$	82	$7.1 < pH \leq 7.2$	46	$8.1 < pH \leq 8.2$	8.8
$6.2 < pH \leq 6.3$	80	$7.2 < pH \leq 7.3$	40	$8.2 < pH \leq 8.3$	7.3
$6.3 < pH \leq 6.4$	78	$7.3 < pH \leq 7.4$	35	$8.3 < pH \leq 8.4$	6.0
$6.4 < pH \leq 6.5$	75	$7.4 < pH \leq 7.5$	31	$8.4 < pH \leq 8.5$	5.0
$6.5 < pH \leq 6.6$	72	$7.5 < pH \leq 7.6$	26	$8.5 < pH \leq 8.6$	4.1
$6.6 < pH \leq 6.7$	69	$7.6 < pH \leq 7.7$	22	$8.6 < pH \leq 8.7$	3.4
$6.7 < pH \leq 6.8$	65	$7.7 < pH \leq 7.8$	19	$8.7 < pH \leq 8.8$	2.8
$6.8 < pH \leq 6.9$	60	$7.8 < pH \leq 7.9$	16	$8.8 < pH \leq 8.9$	2.4
$6.9 < pH \leq 7.0$	56	$7.9 < pH \leq 8.0$	13	$8.9 < pH \leq 9.0$	2.0

5. Monitoring only.
6. An interim limit of 1.0 mg/L became effective July 1, 2023. An MDV interim limit of 0.6 will become effective in this permit term. The final WQBEL is 0.075 mg/L as six-month average and 0.225 mg/L as a monthly average.
7. As recommended in the Department's October 1, 2019 Guidance for Total Nitrogen Monitoring in Wastewater Permits, annual total nitrogen monitoring is recommended for all minor municipal permittees. Sections 283.37(5) and 283.55(1)(e), Wis. Stats, and ss. NR 200.065(1)(g) and NR 200.065(1)(h), Wis. Adm. Codes, provide the authority to request this monitoring during the permit term. Total Nitrogen is the sum of nitrate (NO_3), nitrite (NO_2), and total Kjeldahl nitrogen (TKN) (all expressed as N).

No WET testing is required because information related to the discharge indicates low to no risk for toxicity.

Please consult the attached report for details regarding the above recommendations. If there are any questions or comments, please contact Zainah Masri at Zainah.Masri@wisconsin.gov or Diane Figiel at Diane.Figiel@wisconsin.gov.

Attachments (4) – Narrative, Map, Thermal Table, and Ammonia Nitrogen Calculations

PREPARED BY: Zainah Masri, Water Resources Engineer Zainah Masri

APPROVED BY: Diane Figiel Date: 01/23/2026
Diane Figiel, PE,
Water Resources Engineer

E-cc: Jordan Main, Wastewater Engineer – SCR/Fitchburg
Lisa Creegan, Regional Wastewater Supervisor – SCR/Fitchburg
Diane Figiel, Water Resources Engineer – WY/3
Nate Willis, Environmental Engineer Supervisor – WY/3
Kari Fleming, Natural Resources Program Manager – WY/3

Attachment #1

Water Quality-Based Effluent Limitations for
Lebanon Sanitary District #1 Wastewater Treatment Facility

WPDES Permit No. WI-0031364-09-0

Prepared by: Zainah Masri – WY/3

PART 1 – BACKGROUND INFORMATION

Facility Description

Lebanon Sanitary District #1 is a covered three-pond lagoon system followed by a recirculating sand filter. A facility upgrade was completed in 2024 including installation of headworks, cover and baffling on the final lagoon, a permanent chemical feed system, and replacement of the RSF media. Influent wastewater enters the facility through the influent grinder pump station where flow is measured and dosed with phosphorus treatment chemical. Flow passes through the three stabilization lagoons in series where BOD, TSS, and phosphorus is reduced before entering the RSF dosing chamber where flow is recirculated for additional biological treatment prior to metering and discharge to the unnamed tributary to Baker Creek.

Attachment #2 is a map of the area showing the approximate location of Outfall 003.

Existing Permit Limitations

The current permit, which expired on December 31, 2024 includes the following effluent limitations and monitoring requirements.

Parameter	Daily Maximum	Daily Minimum	Weekly Average	Monthly Average	Six-Month Average	Footnotes
Flow Rate				0.048 MGD		1,2
BOD_5			30 mg/L	20 mg/L		1
TSS			30 mg/L	20 mg/L		1,5
pH	9.0 s.u.	6.0 s.u.				1
Dissolved Oxygen		4.0 mg/L				1
Ammonia Nitrogen April May June – September October November – March	 Variable Variable Variable Variable Variable		 19 mg/L 19 mg/L 8.7 mg/L 26 mg/L 26 mg/L	 13 mg/L 10 mg/L 5.9 mg/L 16 mg/L 18 mg/L		3
Chloride						4
Phosphorus Interim MDV Interim Final				 3.9 mg/L 1.0 mg/L 0.225 mg/L	 0.075 mg/L	5,6
Temperature						7

Footnotes:

1. These limitations are not being evaluated as part of this review. Because the water quality criteria (WQC), reference effluent flow rates, and receiving water characteristics have not changed, limitations for these water quality characteristics do not need to be re-evaluated at this time.
2. The previous permit (-07 reissuance) public noticed in March 2014 included a daily maximum limit of 0.0473 MGD, as recommended by the compliance engineer at the time to address overloading of the RSF. In response to public comment by the facility, this daily maximum was changed to a monthly average limit of 0.048 MGD in the reissued permit. A flow rate limit of 0.048 MGD as a monthly average was included in the -08 reissuance Fact Sheet but omitted from the current permit in error. A flow rate limit of 0.048 MGD was recommended in the WQBEL memo dated April 16, 2019. The flow rate limit is recommended to continue in the reissued permit consistent with the previous permit(s).
3. The variable daily maximum ammonia nitrogen limit table corresponding to various effluent pH values is shown below. These limits apply year-round.

Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L
$6.0 < pH \leq 6.1$	83	$7.0 < pH \leq 7.1$	51	$8.0 < pH \leq 8.1$	11
$6.1 < pH \leq 6.2$	82	$7.1 < pH \leq 7.2$	46	$8.1 < pH \leq 8.2$	8.8
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$6.7 < pH \leq 6.8$	65	$7.7 < pH \leq 7.8$	19	$8.7 < pH \leq 8.8$	2.8
$6.8 < pH \leq 6.9$	60	$7.8 < pH \leq 7.9$	16	$8.8 < pH \leq 8.9$	2.4
$6.9 < pH \leq 7.0$	56	$7.9 < pH \leq 8.0$	13	$8.9 < pH \leq 9.0$	2.0

4. Monthly monitoring only.
5. Additional phosphorus and TSS mass limitations are required in accordance with the waste load allocations specified in the Rock River TMDL.

Month	Monthly Ave TSS Effluent Limit lbs/day	Weekly Ave TSS Effluent Limit lbs/day	Monthly Ave Total P Effluent Limit lbs/day
Jan	2.6	3.9	0.27
Feb	2.9	4.3	0.36
March	2.6	3.9	0.28
April	2.7	4.0	0.22
May	2.6	3.9	0.19
June	2.7	4.0	0.17
July	2.6	3.9	0.17
Aug	2.6	3.9	0.17
Sept	2.7	4.0	0.19
Oct	2.6	3.9	0.19
Nov	2.7	4.0	0.20
Dec	2.6	3.9	0.23

6. The 3.9 mg/L interim limit was effective through June 30, 2023 and the 1.0 MDV interim limit became effective July 1, 2023. The final WQBEL is 0.075 mg/L as six-month average and 0.225 mg/L as a monthly average.
7. Monitoring in 2022 only.

Receiving Water Information

- Name: Unnamed Tributary to Baker Creek
- Classification used in accordance with chs. NR 102 and 104, Wis. Adm. Code: The unnamed tributary to Baker Creek is listed in ch. NR 104 as a Limited Aquatic Life (LAL) Community. Approximately 1.2 miles downstream of the outfall, Baker Creek is classified as a warm water sport fish (WWSF) community.
    - Low flows used in accordance with chs. NR 106 and 217, Wis. Adm. Code: An estimated low flow for the tributary is not available; low flow is assumed to be 0 cfs
    - Approximately 1.2 miles downstream at Baker Creek
        - 7-Q_{10} = 0.17 cfs (cubic feet per second)
        - 7-Q2 = 0.42 cfs
          This was estimated using surface water data viewer.
- Hardness = 250 mg/L as $CaCO_3$. This value represents the geometric mean of effluent data taken during July 2024 from the permit application. Effluent hardness is used in place of receiving water because there is no receiving water flow upstream of the discharge.
- % of low flow used to calculate limits in accordance with s. NR 106.06(4)(c)5., Wis. Adm. Code: Not applicable where the receiving water low flows are zero.
- Source of background concentration data: Background concentrations are not included because they do not impact the calculated WQBEL when the receiving water low flows are equal to zero.
- Multiple dischargers: None
- Impaired water status: The Rock River, located approximately four miles downstream of the outfall, is impaired for phosphorus and has an approved TMDL in place.

Effluent Information

- Design flow rate(s):
  Annual average = 0.047 million gallons per day (MGD)
  The actual average flow from February 2019 to May 2025 was 0.02 MGD
  The 0.04 MGD flow rate is used to account for the noncontinuous nature of the discharge.
- Hardness = 250 mg/L as $CaCO_3$. This value represents the geometric mean of data taken during July 2024 from the permit application.
- Acute dilution factor used in accordance with s. NR 106.06(3)(c), Wis. Adm. Code: Not applicable – this facility does not have an approved Zone of Initial Dilution (ZID).
- Wastewater source: Domestic wastewater from the town of Lebanon with no industrial contributors.
- Water supply: Private wells.
- Additives: Phosphorus treatment chemical (ferric chloride)
- Effluent characterization: This facility is categorized as a minor municipality, so the permit application required effluent sample analyses for a limited number of common pollutants, as specified in s. NR 200.065, Table 1, Wis. Adm. Code, primarily metal substances plus ammonia, chloride, hardness and phosphorus.
- Effluent data for substances for which a single sample was analyzed is shown in the tables in Part 2, in the column titled “MEAN EFFL. CONC.”. Otherwise, substances with multiple effluent data are shown in the tables below or in their respective parts in this evaluation.

Attachment #1

Copper Effluent Data

Sample Date	Copper (µg/L)	Sample Date	Copper (µg/L)	Sample Date	Copper (µg/L)
07/01/2024	0.813	07/13/2024	<0.806	07/25/2024	<0.806
07/04/2024	<0.806	07/16/2024	<0.806	07/28/2024	0.896
07/07/2024	1.135	07/19/2024	<0.806	08/12/2024	<0.806
7/10/2024	<0.806	07/22/2024	<0.806		
Mean = 0.26 µg/L					

"<" means that the pollutant was not detected at the indicated limit of detection. The mean concentration was calculated using zero in place of the non-detected results.

Chloride Effluent Data

	Chloride (mg/L)
1-day P_{99}	476.8
4-day P_{99}	383.0
30-day P_{99}	330.8
Mean	303.3
Std	62.3
Sample size	135
Range	192 - 485

The following table presents the average concentrations and loadings at Outfall 003 from March 2019 to May 2025 for all parameters with limits in the current permit to meet the requirements of s. NR 201.03(6), Wis. Adm. Code:

Parameters with Effluent Limits

	Average Measurement	Average Mass Discharged
BOD_5	3.3 mg/L*	-
TSS	3.1 mg/L	1.1 lbs/day
pH field	3.9 s.u.	-
Dissolved Oxygen	4.3 mg/L	-
Ammonia Nitrogen	0.63 mg/L*	-
Phosphorus	0.42 mg/L	0.13 lbs/day

*Results below the limit of detection (LOD) were included as zeroes in calculation of average.

PART 2 – WATER QUALITY-BASED EFFLUENT LIMITATIONS FOR TOXIC SUBSTANCES – EXCEPT AMMONIA NITROGEN

Permit limits for toxic substances are required whenever any of the following occur:

1. The maximum effluent concentration exceeds the calculated limit (s. NR 106.05(3), Wis. Adm. Code)
2. If 11 or more detected results are available in the effluent, the upper 99th percentile (or P_{99}) value exceeds the comparable calculated limit (s. NR 106.05(4), Wis. Adm. Code)
3. If fewer than 11 detected results are available, the mean effluent concentration exceeds 1/5 of the calculated limit (s. NR 106.05(6), Wis. Adm. Code)

Acute Limits based on 1-Q_{10}

Daily maximum effluent limitations for toxic substances are based on the acute toxicity criteria (ATC), listed in ch. NR 105, Wis. Adm. Code. Previously daily maximum limits for toxic substances were calculated as two times the ATC. However, changes to ch. NR 106, Wis. Code, (September 1, 2016) require the Department to calculate acute limitations using the same mass balance equation as used for other limits along with the 1-Q_{10} receiving water low flow to determine if more restrictive effluent limitations are needed to protect the receiving stream from discharges which may cause or contribute to an exceedance of the acute water quality standards. The mass balance equation is provided below.

$$\text{Limitation} = \frac{(WQC)\,(Qs + (1-f)\,Qe) - (Qs - f\,Qe)\,(Cs)}{Qe}$$

Where:

WQC =Acute toxicity criterion or secondary acute value according to ch. NR 105, Wis. Adm. Code.

Qs = average minimum 1-day flow which occurs once in 10 years (1-day Q_{10}) if the 1-day Q_{10} flow data is not available = 80% of the average minimum 7-day flow which occurs once in 10 years (7-day Q_{10}).

Qe = Effluent flow (in units of volume per unit time) as specified in s. NR 106.06(4)(d), Wis. Adm. Code.

f = Fraction of the effluent flow that is withdrawn from the receiving water, and

Cs = Background concentration of the substance (in units of mass per unit volume) as specified in s. NR 106.06(4)(e), Wis. Adm. Code.

If the receiving water is effluent dominated under low stream flow conditions, the 1-Q_{10} method of limit calculation produces the most stringent daily maximum limitations and should be used while making reasonable potential determinations. This is the case for Lebanon Sanitary District #1.

The following tables list the calculated WQBELs for this discharge along with the results of effluent sampling for all the detected substances. concentrations are expressed in terms of micrograms per Liter (µg/L), except for hardness and chloride (mg/L).

Daily Maximum Limits based on Acute Toxicity Criteria (ATC)

RECEIVING WATER FLOW = 0 cfs, (1-Q_{10} (estimated as 80% of 7-Q_{10})), as specified in s. NR 106.06(3)(bm), Wis. Adm. Code.

SUBSTANCE	REF. HARD. mg/L	ATC	MAX. EFFL. LIMIT*	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.	1-day P_{99}	1-day MAX. CONC.
Arsenic		340	340	68	1.647		
Cadmium	250	83	83	17	<0.268		
Chromium	250	3,819	3,819	764	<0.282		
Copper	250	37	37	7.4	0.26		1.14
Lead	250	259	259	52	<0.385		
Nickel	250	1,019	1,019	204	1.597		
Zinc	250	268	268	54	2.648		
Chloride (mg/L)		757	757			438	485

* Per the changes to s. NR 106.07(3), Wis. Adm. Code, effective 09/01/2016 consideration of ambient concentrations and 1-Q_{10} flow rates yields a more restrictive limit than the 2 × ATC method of limit calculation.

Weekly Average Limits based on Chronic Toxicity Criteria (CTC)

RECEIVING WATER FLOW = 0 cfs (¼ of the 7-Q_{10}), as specified in s. NR 106.06(4)(c), Wis. Adm. Code

SUBSTANCE	REF. HARD.* mg/L	CTC	WEEKLY AVE. LIMIT	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.	4-day P_{99}
Arsenic		152	152	30	1.647	
Cadmium	175	3.8	3.8	0.8	<0.268	
Chromium	250	280	280	56	<0.282	
Copper	250	23	23	4.5	0.26	
Lead	250	68	68	14	<0.385	
Nickel	250	159	159	32	1.597	
Zinc	250	268	268	54	2.648	
Chloride (mg/L)		395	395			355

* The indicated hardness may differ from the receiving water hardness because the receiving water hardness exceeded the maximum range in ch. NR 105, Wis. Adm. Code, over which the chronic criteria are applicable. In that case, the maximum of the range is used to calculate the criterion.

Monthly Average Limits based on Wildlife Criteria (WC)

The effluent characterization did not include any effluent sampling results for substances for which Wildlife Criteria exist.

Monthly Average Limits based on Human Threshold Criteria (HTC)

RECEIVING WATER FLOW = 0 cfs (¼ of Harmonic Mean), as specified in s. NR 106.06(4), Wis. Adm. Code.

SUBSTANCE	HTC	MO'LY AVE. LIMIT	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.
Cadmium	880	880	176	<0.268
Chromium (+3)	8,400,000	8,400,000	1,680,000	<0.282
Lead	2,240	2,240	448	<0.385
Nickel	110,000	110,000	22,000	1.597

Monthly Average Limits based on Human Cancer Criteria (HCC)

RECEIVING WATER FLOW = 0 cfs (¼ of Harmonic Mean), as specified in s. NR 106.06(4), Wis. Adm. Code.

SUBSTANCE	HCC	MO'LY AVE. LIMIT	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.
Arsenic	40	40	8	1.647

Conclusions and Recommendations

Based on a comparison of the effluent data and calculated effluent limitations, **effluent limitations are not required, but chloride monitoring is recommended**. Limits and/or monitoring recommendations are made in the paragraphs below:

Copper – Considering available effluent data from the permit application, taken during the period of July 2024 to August 2024 the mean concentration is 0.26 µg/L, with a maximum concentration of 1.135 µg/L. These are less than 1/5th of the lowest calculated limits, therefore **concentration and mass limits, as well as monthly monitoring, are not required.**

Chloride – Considering available effluent data from the current permit term from March 2019 to May 2024 the 1-day P_{99} chloride concentration is 438 mg/L, and the 4-day P_{99} of effluent data is 355 mg/L.

These effluent concentrations are below the calculated WQBELs for chloride, **therefore no effluent limits are needed. Chloride monitoring is recommended to ensure that sufficient sample results are available at the next permit issuance to meet the data requirements of s. NR 106.85, Wis. Adm. Code**.

Chloride Monitoring Recommendations
Four samples per month (on consecutive days) are recommended. This allows for averaging of the results to compare with the interim limit and allows the use of the average in determining future interim limits, and degree of success with chloride reduction measures.

Mercury – The permit application did not require monitoring for mercury because the Lebanon Sanitary District #1 Wastewater Treatment Facility is categorized as a minor facility as defined in s. NR 200.02(8), Wis. Adm. Code. In accordance with s. NR 106.145(3)(a)3, Wis. Adm. Code, a minor municipal discharger shall monitor, and report results of influent and effluent mercury monitoring once every three months if, "there are two or more exceedances in the last five years of the high-quality sludge mercury concentration of 17 mg/kg specified in s. NR 204.07(5), Wis. Adm. Code." A review of the past five years of sludge characteristics data reveals that all the sample results are within expected analytical ranges and well below the 17 mg/kg level. The sludge concentration was sampled September 24, 2022 and was 0.11 mg/kg. **Therefore, no mercury monitoring is recommended at Outfall 003.**

PFOS and PFOA – The need for PFOS and PFOA monitoring is evaluated in accordance with s. NR 106.98(2), Wis. Adm. Code.

Based on the type of discharge, the effluent flow rate, and unknown levels of PFOS/PFOA in the source water **PFOS and PFOA monitoring is not recommended.**

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.

PART 3 – WATER QUALITY-BASED EFFLUENT LIMITATIONS FOR AMMONIA NITROGEN

The State of Wisconsin promulgated revised water quality standards for ammonia nitrogen in ch. NR 105, Wis. Adm. Code, effective March 1, 2004 which includes criteria based on both acute and chronic toxicity to aquatic life. The current permit has daily maximum, weekly average and monthly average limits. These limits are re-evaluated at this time due to the following changes:

- Subchapter IV of ch. NR 106, Wis. Adm. Code allows limits based on available dilution instead of limits set to twice the acute criteria.
- The maximum expected effluent pH has changed

Daily Maximum Limits based on Acute Toxicity Criteria (ATC)

Daily maximum limitations are based on acute toxicity criteria in ch. NR 105, Wis. Adm. Code, which are a function of the effluent pH and the receiving water classification. The acute toxicity criterion (ATC) for ammonia is calculated using the following equation:

$$\text{ATC in mg/L} = [A \div (1 + 10^{(7.204 - \text{pH})})] + [B \div (1 + 10^{(\text{pH} - 7.204)})]$$

Where:

A = 0.633 and B = 90.0 for Limited Aquatic Life, and
pH (s.u.) = that characteristic of the effluent.

The effluent pH data was examined as part of this evaluation. A total of 65 sample results were reported from . The maximum reported value was 8.7 s.u. (Standard pH Units). The effluent pH was 8.7 s.u. or less 99% of the time. The 1-day P_{99}, calculated in accordance with s. NR 106.05(5), Wis. Adm. Code, is 8.70 s.u. The mean plus the standard deviation multiplied by a factor of 2.33, an estimate of the upper ninety ninth percentile for a normally distributed dataset, is 8.6 s.u. Therefore, a value of 8.6 s.u. is believed to represent the maximum reasonably expected pH, and therefore most appropriate for determining daily maximum limitations for ammonia nitrogen. Substituting a value of 8.6 s.u. into the equation above yields an ATC = 4.1 mg/L.

Daily Maximum Ammonia Nitrogen Effluent Limitations Calculation Method

In accordance with s. NR 106.32(2), Wis. Adm. Code daily maximum ammonia limitations are calculated using the 1-Q_{10} receiving water low flow if it is determined that the previous method of acute ammonia limit calculation (2×ATC) is not sufficiently protective of the fish and aquatic life. The more restrictive calculated limits shall apply.

The calculated daily maximum ammonia nitrogen effluent limits using the mass balance approach with the 1-Q_{10} (estimated as 80 % of 7-Q_{10}) and the 2×ATC approach are shown below.

Daily Maximum Ammonia Nitrogen Determination

	Ammonia Nitrogen Limit mg/L
2×ATC	8.2
1-Q_{10}	4.1

The 1-Q_{10} method yields the most stringent limits for Lebanon Sanitary District #1 Wastewater Treatment Facility.

The current permit has variable daily maximum effluent limits based on effluent pH. Presented below is a table of daily maximum limitations corresponding to various effluent pH values.

Daily Maximum Ammonia Nitrogen Limits – LAL

Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L
$6.0 \leq pH \leq 6.1$	83	$7.0 < pH \leq 7.1$	51	$8.0 < pH \leq 8.1$	11
$6.1 < pH \leq 6.2$	82	$7.1 < pH \leq 7.2$	46	$8.1 < pH \leq 8.2$	8.8
$6.2 < pH \leq 6.3$	80	$7.2 < pH \leq 7.3$	40	$8.2 < pH \leq 8.3$	7.3
$6.3 < pH \leq 6.4$	78	$7.3 < pH \leq 7.4$	35	$8.3 < pH \leq 8.4$	6.0
$6.4 < pH \leq 6.5$	75	$7.4 < pH \leq 7.5$	31	$8.4 < pH \leq 8.5$	5.0

Attachment #1

Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L
$6.5 < pH \leq 6.6$	72	$7.5 < pH \leq 7.6$	26	$8.5 < pH \leq 8.6$	4.1
$6.6 < pH \leq 6.7$	69	$7.6 < pH \leq 7.7$	22	$8.6 < pH \leq 8.7$	3.4
$6.7 < pH \leq 6.8$	65	$7.7 < pH \leq 7.8$	19	$8.7 < pH \leq 8.8$	2.8
$6.8 < pH \leq 6.9$	60	$7.8 < pH \leq 7.9$	16	$8.8 < pH \leq 8.9$	2.4
$6.9 < pH \leq 7.0$	56	$7.9 < pH \leq 8.0$	13	$8.9 < pH \leq 9.0$	2.0

Weekly and Monthly Average Limits based on Chronic Toxicity Criteria (CTC)
Weekly and monthly average limits are not included in the current permit but are being evaluated here due to changes to ch. NR 106, Wis. Adm. Code. **The weekly and monthly average ammonia nitrogen limits calculation from the previous memo do not change** because there have been no changes in the effluent and receiving water flow rates. The calculations from the previous WQBEL memo are shown in attachment #4.

Effluent Data

Ammonia Nitrogen Effluent Data

	Ammonia Nitrogen mg/L
1-day P_{99}	6.9
4-day P_{99}	3.8
30-day P_{99}	1.6
Mean*	0.63
Std	2.1
Sample size	286
Range	<0.03 - 14

*Values lower than the limit of detection were substituted with a zero

Ammonia Nitrogen mg/L	April	May	June - September	October	November - March
1-day P_{99}	13	5.0	4.7	2.4	16
4-day P_{99}	7.0	2.8	2.6	1.3	8.8
30-day P_{99}	3.3	1.7	1.4	0.64	3.9
Mean*	1.8	1.2	0.96	0.37	1.9
Std	2.8	1.0	0.96	0.52	3.6
Sample size	23	27	52	14	27
Range	<0.03 - 10	0.07 - 3.33	0.05 - 3.5	0.08 - 1.64	0.09 - 14

*Values lower than the limit of detection were substituted with a zero

Reasonable Potential

The permit currently has daily maximum limits year-round, as well as weekly and monthly limits year-round Where there are existing ammonia nitrogen limits in the permit, the limits must be retained regardless of reasonable potential, consistent with s. NR 106.33(1)(b), Wis. Adm. Code:

> (b) If a permittee is subject to an ammonia limitation in an existing permit, the limitation shall be included in any reissued permit. Ammonia limitations shall be included in the permit if the permitted facility will be providing treatment for ammonia discharges.

Conclusions and Recommendations

In summary, after rounding to two significant figures, the following ammonia nitrogen limitations are recommended. No mass limitations are recommended in accordance with s. NR 106.32(5), Wis. Adm Code.

Final Ammonia Nitrogen Limits

	Daily Maximum mg/L	Weekly Average mg/L	Monthly Average mg/L
April	Variable	19 mg/L	13 mg/L
May	Variable	19 mg/L	10 mg/L
June – September	Variable	8.7 mg/L	5.9 mg/L
October	Variable	26 mg/L	16 mg/L
November – March	Variable	26 mg/L	18 mg/L

PART 4 – WATER QUALITY-BASED EFFLUENT LIMITATIONS FOR BACTERIA

Lebanon Sanitary District #1 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 to Baker Creek is listed in ch. NR 104, Wis. Adm. Code, as continuous. Continuous streams have a higher likelihood of providing opportunities for full contact recreational activities. Therefore, disinfection should not be exempted based solely on this hydrological classification.

Section NR 102.04(5), Wis. Adm. Code, states that all surface waters shall be suitable for supporting recreational use and shall meet *E. coli* criteria during the recreation season. Section NR 102.04(5)(b), Wis. Adm. Code, allows the Department to make exceptions when it determines, in accordance with s. NR 210.06(3), Wis. Adm. Code, that wastewater disinfection is not required to meet E. coli limits and protect the recreational use. Section NR 210.06(3), Wis. Adm. Code, tasks the Department with determining the need for disinfection using a site-specific analysis based on potential risk to human or animal health. It sets out the factors that must be considered in determining the necessity to disinfect municipal wastewater or to change the length of the disinfection season.

It is recognized Lebanon Sanitary District #1 potentially has a detention time of at least 180 days, in which the resulting discharged effluent is thought to not pose a risk to human and animal heath, as described in s. NR 210.06(3)(h), Wis. Adm. Code.

$$(Detention\ Time\ [days] = \frac{Total\ Pond\ Volume\ [MG]}{180 \quad average\ flow\ rate\ [mgd\}})$$

The maximum 180-day rolling average flowrate for the facility is 0.05 MGD (February 2019 – May 2025) including days discharge did not occur. The total volumetric capacity of all three lagoons is approx. 5.79 MG, which was provided by the facility. Therefore, the estimated shortest detention time for the facility is approximately 5.79 MG / 0.021 MGD = 276 days and is significantly greater than the 180-day minimum. This detention time is expected to provide sufficient treatment to meet bacterial standards. **Therefore, bacteria limits are not recommended during the reissued permit term.**

PART 5 – PHOSPHORUS AND TOTAL SUSPENDED SOLIDS (TSS)

Technology-Based Effluent Limit
Subchapter II of Chapter NR 217, Wis. Adm. Code, requires municipal wastewater treatment facilities that discharge greater than 150 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 Lebanon Sanitary District #1 currently has a limit of 1.0 mg/L, this limit should be included in the reissued permit. This limit remains applicable unless a more stringent WQBEL is given.

In addition, the need for a WQBEL for phosphorus must be considered.

Water Quality-Based Effluent Limits (WQBEL)
Revisions to administrative rules regulating phosphorus took effect on December 1, 2010. These rule revisions include additions to s. NR 102.06, Wis. Adm. Code, which establish phosphorus standards for surface waters. Subchapter III of NR 217, Wis. Adm. Code, establishes procedures for determining WQBELs for phosphorus, based on the applicable standards in ch. NR 102, Wis. Adm. Code.

Section NR 217.16, Wis. Adm. Code, states that the Department may include a TMDL-derived WQBEL for phosphorus in addition to, or in lieu of, a s. NR 217.13 WQBEL in a WPDES permit. This limit should be expressed in a manner consistent with the wasteload allocation and assumptions of the TMDL. Because the unnamed tributary and Baker Creek were not listed as impaired for phosphorus at the time of TMDL development, an s. NR 217.13, Wis. Adm. Code is required.

TMDL Limits
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 page 148 *of Total Maximum Daily Loads for Total Phosphorus and Total Suspended Solids in the Rock River Basin*, dated July 2011 and is expressed as a maximum annual load (lbs/month).

Total Phosphorus Effluent Limitations

Attachment #1

Month	Monthly Total P WLA[1] (lbs/month)	Days Per Month	Monthly Ave Total P Effluent Limit[2] (lbs/day)
Jan	8.32	31	**0.27**
Feb	9.94	28	**0.36**
March	8.61	31	**0.28**
April	6.61	30	**0.22**
May	5.97	31	**0.19**
June	5.1	30	**0.17**
July	5.34	31	**0.17**
Aug	5.39	31	**0.17**
Sept	5.76	30	**0.19**
Oct	5.79	31	**0.19**
Nov	5.87	30	**0.20**
Dec	7.02	31	**0.23**

Footnotes:
1- Rock River TMDL Appendix P. Monthly Total Phosphorus Allocations by Wastewater Treatment Facility (p. 147)
2- monthly average Total P effluent limit (lbs/day) = monthly Total P WLA (lbs/month) ÷ days per month

These limits are equivalent to concentrations ranging from 0.43 mg/L to 0.90 mg/L at the facility design flow of 0.0473 MGD. Monthly average mass effluent limits with accordance to the table above are recommended for this discharge.

Point of Discharge Phosphorus Limits
Phosphorus criteria in s. NR 102.06, Wis. Adm. Code, do not apply to limited aquatic life waters as described in s. NR 102.06(6)(d), Wis. Adm. Code. These waters were not included in the USGS/WDNR stream and river studies and, therefore, the Department lacked the technical basis to determine and propose applicable criteria. At some time in the future, the Department may adopt phosphorus criteria based on new studies focusing on limited aquatic life waters. *The Guidance for Implementing Wisconsin's Phosphorus Water Quality Standards for Point Source Discharges (2020)* suggests that during the interim, WQBELs should be based on the criteria and flow conditions for the next stream segment downstream (or downstream lake or reservoir, if appropriate), because ss. 217.12 and 217.13, Wis. Adm. Code, state that the Department must set WQBELs to protect downstream waters. The discharge location of the wastewater from Lebanon Sanitary District #1 Sewage Commission is classified as limited aquatic life downstream from the point of discharge downstream to Baker Creek where the classification changes, approximately 1.2 miles from the outfall. Baker Creek is classified warm water sport fishery uses. Baker Creek flows to the Rock River, and the Rock River is located approximately 4 miles downstream of the outfall.

Section NR 102.06(3)(a), Wis. Adm. Code, specifically names river segments for which a phosphorus criterion of 0.100 mg/L applies. For other stream segments that are not specified in s. NR 102.06(3)(a), Wis. Adm. Code, s. NR 102.06(3)(b), Wis. Adm. Code, specifies a phosphorus criterion of 0.075 mg/L. The phosphorus criterion of 0.075 mg/L applies for Baker Creek.

The conservation of mass equation is described in s. NR 217.13 (2)(a), Wis. Adm. Code, for phosphorus WQBELs and includes variables of water quality criterion (WQC), receiving water flow rate (Qs), effluent flow rate (Qe), and upstream phosphorus concentrations (Cs):

$$\text{Limitation} = [(WQC)(Qs+(1-f)\ Qe) - (Qs-f\ Qe)\ (Cs)]/Qe$$

Where:

WQC = 0.075 mg/L for Baker Creek
Qs = 100% of the 7-Q_2 of 0.42 cfs
Cs = background concentration of phosphorus in the receiving water pursuant to s. NR 217.13(2)(d), Wis. Adm. Code
Qe = effluent flow rate = 0.0473 MGD = 0.073 cfs
f = the fraction of effluent withdrawn from the receiving water = 0

A previous evaluation resulted in a WQBEL of 0.075 mg/L using a low flow of zero for Baker Creek. Additional information is available, and this low flow is estimated to be 0.42 cfs so the limits are recalculated.

Section NR 217.13(2)(d), Wis. Adm. Code, specifies that the background phosphorus concentration used in the limit calculation formula shall equal the median of at least four samples collected during the months of May through October, and that all samples collected during a 28-day period shall be considered as a single sample and the average of these concentrations used to determine a median. Averaging begins at date of the first sample in the range of May through October.

In stream total phosphorus data upstream of the discharge is not available, however, the following data were considered in estimating the background phosphorus concentration:

SWIMS ID	143281	10012283	10031717
Station Name	Monitoring station at Beaver Dam River at Cth J Bridge	Monitoring station at Silver Creek at Silver Creek Rd.	Monitoring station at Rock River at STH 60 downstream from Lake Sinissippi
Waterbody	Beaver Dam River	Silver Creek	Rock River
Sample Count	6	6	6
First Sample	10/20/2009	05/18/2015	10/18/2010
Last Sample	09/15/2010	10/11/2015	12/31/2014
Mean	0.311 mg/L	0.146 mg/L	0.273 mg/L
Median	0.294 mg/L	0.098 mg/L	0.338 mg/L

Substituting a background concentration above criteria into the limit calculation equation above would result in a calculated limit that is less than the applicable criterion of 0.075 mg/L. However, s. NR 217.13(7), Wis. Adm. Code, specifies that "if the water quality-based effluent limitation calculated pursuant to the procedures in this section is less than the phosphorus criterion specified in s. NR 102.06, Wis. Adm. Code, for the water body, the effluent limit shall be set equal to the criterion."

Effluent Data

The following table summarizes effluent total phosphorus monitoring data from March 2019 through May 2025.

Effluent Phosphorus Data

	Phosphorus mg/L	Phosphorus lbs/day
1-day P_{99}	4.1	3.0
4-day P_{99}	2.5	1.6
30-day P_{99}	1.7	0.78
Mean*	1.4	0.44
Std	0.78	0.65
Sample size	118	137
Range	0.3 – 3.67	0 .05- 7.1

Reasonable Potential Determination
Since the 30-day P_{99} of reported effluent total phosphorus data is above the calculated WQBEL, the discharge has reasonable potential to cause or contribute to an exceedance of the water quality criterion. Therefore, **a WQBEL is recommended.**

Limit Expression
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 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 for this discharge since it is located upstream of a surface water that has an approved TMDL, pursuant to s. NR 217.14(1)(a), Wis. Adm. Code. The monthly average mass limits based on the TMDL fulfill this requirement.

With the permit application, Lebanon Sanitary District #1 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 in lieu of meeting the final WQBEL. The recommended interim limit during the 2nd permit under MDV approval, pursuant to s. 283.16 (6) (a), Wis. Stats., is 0.6 mg/L as a monthly average. A compliance schedule may be appropriate to meet this interim limit but 1.0 mg/L should not be exceeded during the compliance schedule.

TMDL Limits – TSS
The Rock River TMDL also has wasteload allocations (WLA) for total suspended solids (TSS). For a POTW the limits for TSS must be expressed as weekly and monthly averages. The current permit includes a monthly average limit of 20 mg/L and a weekly average limit of 30 mg/L which equate to 7.9 lbs/day and 11.8 lbs/day, respectively, at the flow rate of 0.047 mgd.

Monthly average and weekly average mass effluent limitations should be included in the permit according to the table below, along with the currently imposed concentration limits. For reference, the mass limits shown are equivalent to concentrations ranging from 6.6 mg/L to 7.4 mg/L as a monthly averages and 9.6 mg/L to 10.9 mg/L as a weekly averages, at the facility design flow.

Attachment #1

Total Suspended Solids Effluent Limitations

Month	Monthly TSS WLA[1] (tons/month)	Days Per Month	Monthly Ave TSS Effluent Limit[2] (lbs/day)	Weekly Ave TSS Effluent Limit[3] (lbs/day)
Jan	0.04	31	**2.6**	**3.9**
Feb	0.04	28	**2.9**	**4.3**
March	0.04	31	**2.6**	**3.9**
April	0.04	30	**2.7**	**4.0**
May	0.04	31	**2.6**	**3.9**
June	0.04	30	**2.7**	**4.0**
July	0.04	31	**2.6**	**3.9**
Aug	0.04	31	**2.6**	**3.9**
Sept	0.04	30	**2.7**	**4.0**
Oct	0.04	31	**2.6**	**3.9**
Nov	0.04	30	**2.7**	**4.0**
Dec	0.04	31	**2.6**	**3.9**

Footnotes:
1- Rock River TMDL Appendix Q. Monthly Total Suspended Solids Allocations by Wastewater Treatment Facility (p. 149)
2- Monthly average TSS effluent limit (lbs/day) = maximum monthly TSS WLA (tons/month) ÷ days per month x 2,000 lbs/ton
3- Weekly average effluent limit (lbs/day) = monthly average limit (lbs/day) x multiplier

The multiplier used in the weekly average limit calculation was determined according to implementation guidance. A coefficient of variation was calculated, based on TSS mass monitoring data, to be 0.8. However, it is believed that the optimization of the wastewater treatment system to achieve the WLA-derived TSS and phosphorus permit limits will reduce effluent variability. Thus, the maximum anticipated coefficient of variation expected by any facility is 0.6. This value, along with monitoring frequency, is used to select the multiplier. Monitoring for TSS is specified as twice per week in the current permit and it is believed this monitoring frequency will remain the same. Table 3 of the implementation guidance is used to select the multiplier of 1.49. If there is a change in monitoring frequency, the stated limits may need to be reevaluated.

Limits based on a WLA should be given in a permit regardless of reasonable potential. However, for informational purposes, the following table lists the statistics for Total Suspended Solids discharge as both a concentration and a mass, using data from March 2019 through May 2025.

	TSS (mg/L)	TSS (lbs/day)
1-day P_{99}	25.2	17.8
4-day P_{99}	13.3	11.2
30-day P_{99}	6.4	5.04
Mean	3.14	1.10
Std	6.55	9.29
Sample Size	426	426
Range	0 - 39	0 – 110.28

PART 6 – WATER QUALITY-BASED EFFLUENT LIMITATIONS FOR THERMAL

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, except for those classified as wastewater effluent channels and wetlands regulated under ch. NR 103 and described in s. NR 106.55(2), Wis. Adm. Code, which has a daily maximum effluent temperature limitation of 120 °F.

Reasonable Potential

Based on the available discharge temperature data from April 2022 to November 2022 shown below, the maximum daily effluent temperature reported was 76 °F; therefore, no reasonable potential for exceeding the daily maximum limit exists, and **limits are not recommended**. Monitoring is recommended in the reissued permit to evaluate the reasonable potential for temperature limits in the following permit term.

Monthly Temperature Effluent Data & Limits

Month	Representative Highest Monthly Effluent Temperature		Calculated Effluent Limit	
	Weekly Maximum (°F)	Daily Maximum (°F)	Weekly Average Effluent Limitation (°F)	Daily Maximum Effluent Limitation (°F)
JAN	-	-	-	86
FEB	-	-	-	86
MAR	-	-	-	86
APR	42	42	-	86
MAY	65	66	-	86
JUN	71	74	-	86
JUL	76	76	-	86
AUG	-	-	-	86
SEP	71	72	-	86
OCT	60	62	-	86
NOV	49	52	-	86
DEC	-	-	-	86

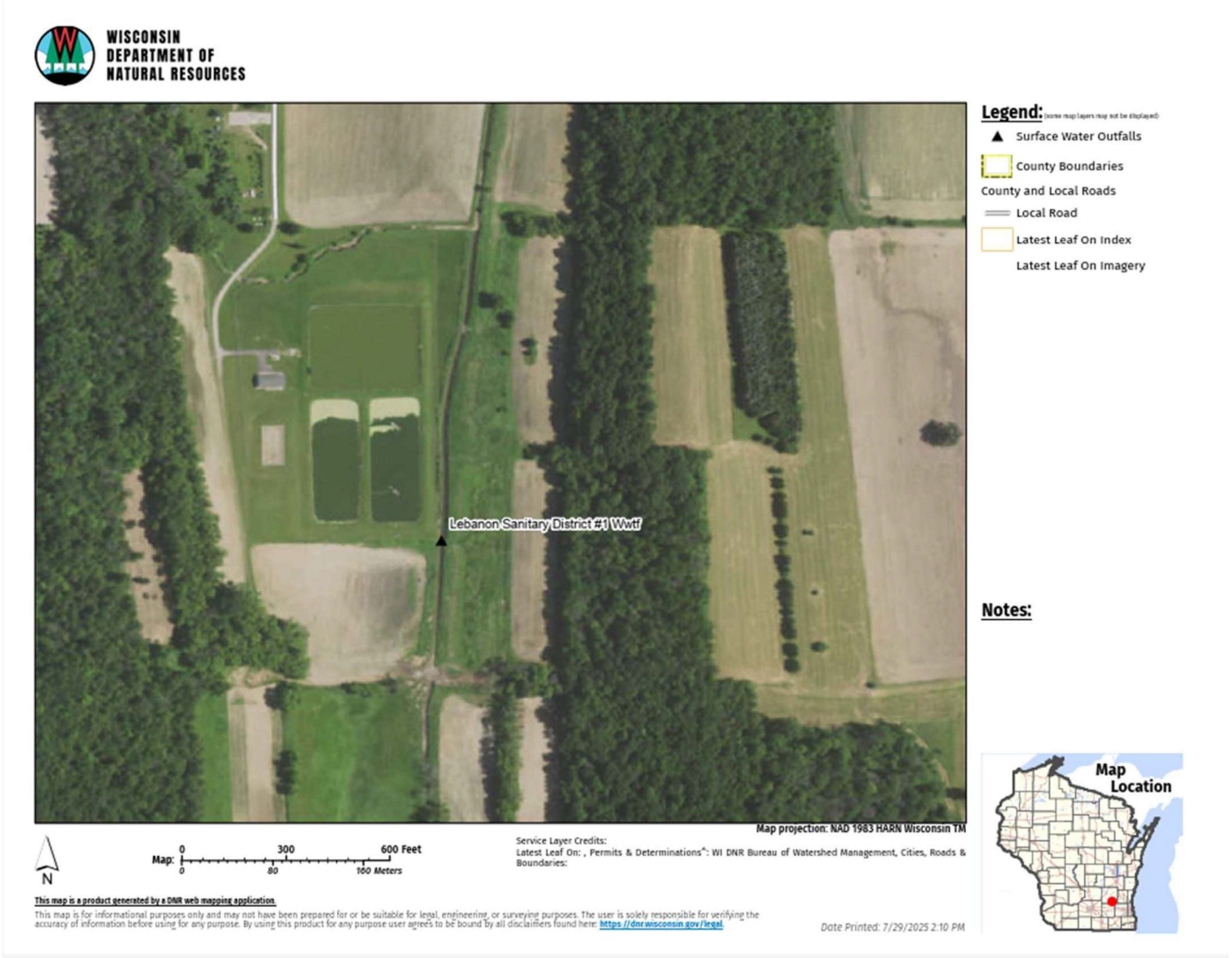
PART 7 – WHOLE EFFLUENT TOXICITY (WET)

WET testing is used to measure, predict, and control the discharge of toxic materials that may be harmful to aquatic life. In WET tests, organisms are exposed to a series of effluent concentrations for a given time and effects are recorded. Decisions below related to the selection of representative data and the need for WET limits were made according to ss. NR 106.08 and 106.09, Wis. Adm. Code. WET monitoring frequency

and toxicity reduction evaluation (TRE) recommendations were made using the best professional judgment of staff familiar with the discharge after consideration of the guidance in the *Whole Effluent Toxicity (WET) Program Guidance Document* (2022).

Guidance in Chapter 1.11 of the WET Guidance Document (WET Testing of Minor Municipal Discharges) was consulted. This is a minor municipal discharge (< 1.0 MGD) comprised solely of domestic wastewater, with no history of WET failures and no toxic compounds detected at levels of concern. **No WET testing is recommended** at this time because of the low risk in effluent toxicity.

Site Map:


WISCONSIN
DEPARTMENT OF
NATURAL RESOURCES
Lebanon Sanitary District #1 Wwtf
Legend:
Surface Water Outfalls
County Boundaries
County and Local Roads
Local Road
Latest Leaf On Index
Latest Leaf On Imagery
Notes:
Map Location
Map projection: NAD 1983 HARN Wisconsin TM
Map: 0 300 600 Feet
0 80 100 Meters
N
Service Layer Credits:
Latest Leaf On: , Permits & Determinations^: WI DNR Bureau of Watershed Management, Cities, Roads & Boundaries:
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Weekly Average & Monthly Average Limits based on Chronic Toxicity Criteria (CTC):
The ammonia limit calculation also warrants evaluation of weekly and monthly average limits based on chronic toxicity criteria for ammonia, since those limits relate to the assimilative capacity of the receiving water.

Weekly and monthly average limits based on chronic toxicity criteria for ammonia are also calculated to determine the weekly and monthly average limits to meet the requirements of s. NR 106.07(3).

Weekly average and monthly average limits for ammonia nitrogen are based on chronic toxicity criteria. The 30-day chronic toxicity criterion (CTC) for ammonia in waters classified as Limited Aquatic Life is calculated by the following equation.

$$CTC = E \times \{[0.0676 \div (1 + 10^{(7.688 - pH)})] + [2.912 \div (1 + 10^{(pH - 7.688)})]\} \times C$$

Where:

pH = the pH (s.u.) of the receiving water,
$E = 1.0$,
$C = 8.09 \times 10^{(0.028 \times (25 - T))}$
T = the temperature of the receiving (°C)

The 30-day chronic toxicity criterion (CTC) for ammonia in waters classified as a Warm Water Sport Fish Community is calculated by the following equation.

$$CTC = E \times \{[0.0676 \div (1 + 10^{(7.688 - pH)})] + [2.912 \div (1 + 10^{(pH - 7.688)})]\} \times C$$

Where:

pH = the pH (s.u.) of the receiving water,
$E = 0.854$,
C = the minimum of 2.85 or $1.45 \times 10^{(0.028 \times (25 - T))}$ – (Early Life Stages Present), or
$C = 1.45 \times 10^{(0.028 \times (25 - T))}$ – (Early Life Stages Absent), and
T = the temperature (°C) of the receiving water – (Early Life Stages Present), or
T = the maximum of the actual temperature (°C) and 7 - (Early Life Stages Absent)

The 4-day criterion is simply equal to the 30-day criterion multiplied by 2.5. The 4-day criteria are used in a mass-balance equation with the 7-Q_{10} (4-Q_3, if available) to derive weekly average limitations. And the 30-day criteria are used with the 30-Q_5 (estimated as 85% of the 7-Q_2 if the 30-Q_5 is not available) to derive monthly average limitations. The stream flow value is further adjusted to temperature; 100% of the flow is used if the Temperature ≥ 16 °C, 25% of the flow is used if the Temperature < 11 °C, and 50% of the flow is used if the Temperature ≥ 11 °C but < 16 °C.

The rules provide a mechanism for less stringent weekly average and monthly average effluent limitations when early life stages (ELS) of critical organisms are absent from the receiving water. This applies only when the water temperature is less than 14.5 °C, during the winter and spring months. Burbot, an early spawning species, are not believed to be present in Unnamed Tributary to Baker Creek, Baker Creek, or the Rock River, based on conversations with local fisheries biologists. So "Early Life Stages Absent" criteria apply from October through March, and "Early Life Stages Present" criteria will apply from April through September for a warm water sport fish waterbody.

Limited Aquatic Life (LAL)

		Spring	Summer	Winter
		April & May	June – Sept.	Oct. - March
Effluent Flow	Qe (MGD)	0.0473	0.0473	0.0473
Background Information	$7\text{-}Q_{10}$ (cfs)	0	0	0
	$7\text{-}Q_{2}$ (cfs)	0	0	0
	Ammonia (mg/L)	0.09	0.07	0.135
	Temperature (°C)	9	19	7
	pH (s.u.)	8.06	8.31	7.91
	% of Flow used	100	100	100
	Reference Weekly Flow (cfs)	0	0	0
	Reference Monthly Flow (cfs)	0	0	0
Criteria mg/L	4-day Chronic	52	17	50
	30-day Chronic	21	6.6	20
Effluent Limits mg/L	Weekly Average	52	17	50
	Monthly Average	21	6.6	20

Warm Water Sport Fish (WWSF)

		Spring	Summer	Winter
		April & May	June – Sept.	Oct. - March
Effluent Flow	Qe (MGD)	0.0473	0.0473	0.0473
Background Information	$7\text{-}Q_{10}$ (cfs)	0.17	0.17	0.17
	$7\text{-}Q_{2}$ (cfs)	0.42	0.42	0.42
	Ammonia (mg/L)	0.09	0.07	0.135
	Temperature (°C)	9	19	4
	pH (s.u.)	8.06	8.31	7.91
	% of Flow used	100	100	100
	Reference Weekly Flow (cfs)	0.17	0.17	0.17
	Reference Monthly Flow (cfs)	0.357	0.357	0.357
Criteria mg/L	4-day Chronic			
	Early Life Stages Present	**5.6**	**2.5**	6.9
	Early Life Stages Absent	8.0	2.5	**7.7**
	30-day Chronic			
	Early Life Stages Present	**2.2**	**1.0**	2.8
	Early Life Stages Absent	3.2	1.0	**3.1**
Effluent Limitations mg/L	Weekly Average			
	Early Life Stages Present	18	8.3	
	Early Life Stages Absent			25
	Monthly Average			
	Early Life Stages Present	13	5.6	
	Early Life Stages Absent			18
Effluent Limitations mg/L (adjusted for decay)	Weekly Average			
	Early Life Stages Present	19	8.7	
	Early Life Stages Absent			26
	Monthly Average			
	Early Life Stages Present	13	5.9	
	Early Life Stages Absent			18

Ammonia Decay: Because the calculated limits are more restrictive than the current limits ammonia decay is considered to determine limits at the outfall to protect the downstream classification. The more restrictive calculated limits should be used to protect at the point of discharge and downstream uses. Where the calculated limits are more restrictive based on downstream uses, ammonia decay can be considered to determine if these more restrictive limits are needed or if the ammonia will decay before it reaches the point of the classification change.

Ammonia decay rates are dependent on temperature with in-stream nitrification essentially non-existent in the winter. In-stream decay is expected so a first order decay model will be used. Based on the available literature, a decay rate of 0.25 day^{-1} at 20°C has been suggested as a default rate. A temperature correction factor of $\theta = 1.08$ is ($k_T = k_{20}\theta^{(T-20)}$).

$$N_{Limit} = \left(\frac{N_{down}}{EXP(-k_t T)} \right)$$

Where: N_{Limit} = Ammonia limit needed to protect downstream use (mg/L)
N_{down} = Ammonia limit calculated based on downstream classification and flow (mg/L)
$-k_t$ = Ammonia decay rate at background stream temperature (day^{-1})
T = Travel time from outfall to downstream use (day)

The velocity of receiving water is assumed to be 5 miles per day and the distance from the point of discharge to the classification change is approximately 1.2 miles for a travel time of 0.24 day. This equation shows that at the location where the classification change, 97% of the ammonia is remaining during April. After decay, the limits are increased as shown in the following table.

Ammonia Limits mg/L	At Outfall (no decay LAL	*At Baker Creek (at WWSF)*	Considering decay 1.2 miles downstream	Current Permit Limits
April - May				
Weekly Average	52	*18*	**19**	none
Monthly Average	21	*13*	**13**	24 April **10** May
June - September				
Weekly Average	17	*8.3*	**8.7**	19 June 17 July 18 August none Sept.
Monthly Average	6.6	*5.6*	**5.9**	7.6 June 6.7 July 7.1 August 10 Sept.
October - March				
Weekly Average	50	*25*	**26**	none
Monthly Average	20	*18*	**18**	**16** October none others

The calculated monthly average limits in May and October are higher than the current limits in the permit. The following table includes the limits based on the full assimilative capacity (AC) and based on significant lowering of water quality (SLOWQ) which is 1/3rd of the available assimilative capacity.

Attachment #3

Increased Limits mg/L	Current Monthly Average Limit	Full AC	SLOWQ
May	10	13	11
October	16	18	17

If Lebanon would like to request an increase to the existing permit limits, an assessment of their effluent data consistent with the requirements of s. NR 207.04 is needed. A successful demonstration under ss. NR 207.04(1)(a) and (c) must be provided to allow limits based on SLOWQ and an additional demonstration under s. NR 207.04(1)(d) must be made to allow limits based on the full assimilative capacity. This evaluation is on a parameter by parameter basis and includes consideration of operations, maintenance and temporary upsets. Without a demonstration of need for a higher limit in accordance with s. NR 207.04 Wis. Adm. Code, the current limits should be continued in the reissued permit.

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

11/7/2025

Pat Ireland
PO Box 116
Lebanon, WI 53047

Subject: Conditional approval of a multi-discharger phosphorus variance
Receiving Stream: Tributary of Baker Creek in Dodge County
Permittee: Lebanon Sanitary District #1, WPDES WI-0031364

Dear Mr. Ireland:

In accordance with s. 283.16 of the Wisconsin Statutes, you have requested coverage under Wisconsin's multi-discharger phosphorus variance for the Lebanon Sanitary District #1 Wastewater Treatment Facility in an application dated 8/26/2024. Wisconsin's multi-discharger phosphorus variance was approved by EPA on September 3, 2025. Coverage under the multi-discharger phosphorus variance may only be granted to an existing source that demonstrates a major facility upgrade is necessary to achieve phosphorus compliance and the upgrade will result in economic hardship as defined in the federally approved variance. The water quality criterion for which you are seeking a variance is contained in s. NR 102.06, Wis. Adm. Code.

After review of the application materials, the Department is tentatively approving coverage under the phosphorus multi discharger variance because the applicant has demonstrated that a major facility upgrade would be required to comply with the phosphorus water quality based effluent limitation, and the applicant meets the economic hardship eligibility criteria delineated in the federally approved variance. In addition, the permitted facility has agreed to comply with the interim limitations that will be included in the WPDES permit, and has agreed to reduce the amount of phosphorus entering surface waters by making payments to the counties pursuant to s. 283.16(6)(b)1., Wis. Stats.

Public comment on this decision will be solicited at the time of permit reissuance after which a final decision will be made. The Department appreciates your attention and interest in Wisconsin's multi-discharger phosphorus variance. Should you have further questions regarding this matter, please contact me at (608) 400 – 5596 or by email at matthew.claucherty@wisconsin.gov.

Sincerely,

Matt Claucherty, MDV Point Source Coordinator
Bureau of Water Quality

e-cc
Jordan Main, WDNR
Betsyjo Howe, WDNR
Michelle Woods, EPA Region 5
Tim Elkins, EPA Region 5

State of Wisconsin
Department of Natural Resources
Bureau of Water Quality
Permits Section - WQ/3

Multi-Discharger Variance Application Evaluation Checklist

Form 3200-145 (R 5/16)

Notice: This checklist is meant to be a tool to help Department of Natural Resources (DNR) staff review municipal and industrial multi-discharger variance (MDV) applications (Forms 3200-149 and 3200-150). Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31-19.39, Wis. Stats.).

Permittee Name

Lebanon Sanitary District #1

WPDES Permit Number	County
WI- 0 | 0 | 3 | 1 | 3 | 6 | 4	Dodge

1. Did the point source apply for the MDV at the appropriate time?	(•) Yes ( ) No. *STOP- facility not eligible at this time.*	*See Questions 1-3.*
2. This operation is (check one):	( ) New or relocated outfall. *STOP- facility not eligible.* (•) Existing outfall	*See Questions 5-6.*
3. Is the point source is located in an MDV eligible area?	(•) Yes ( ) No. *STOP- facility not eligible.*	*Apply County information to Appendix H. Additional information provided in Q7 on municipal form & Q7-8 on industrial form.*
4. The secondary indicator score for the county (counties) the discharge is located is:	6	*See Appendices A-F. If the score is less than 2, stop; the facility is not eligible.* *See Q23 on municipal form & Q28 on industrial form.*
5. Is a major facility upgrade required to comply with phosphorus limits?	(•) Yes ( ) No. *STOP- facility not eligible.*	*See Q8 on municipal form/Q9 on industrial form.*
6. List the months where phosphorus limits cannot be achieved during the permit term:	☒ All ☒ Jan ☒ Apr ☒ Jul ☒ Oct ☒ Feb ☒ May ☒ Aug ☒ Nov ☒ Mar ☒ Jun ☒ Sep ☒ Dec	*Consider checking with limit calculator. If this does not match information in application, the application should be updated prior to approval.*

7. What is the current effluent level achievable?

Outfall Number(s)	Conc. (mg/L)	Method for calculation:	Does this concur with application?	
001	2.08	(•) 30-day P99 ( ) Other, specify:	( ) Yes (•) No, why not: Application did not provide value	*DNR staff should verify the effluent concentration value(s) provided. See Q11 on municipal form & Q12 on industrial form.*

8. What is the appropriate interim limitation(s) for the permit term?

1.0 mg/L as a monthly average, Pursuant to s. 283.16(6)(am), Wis. Stats.
Target Value = 0.2 mg/L

Provide Rationale:

The past three years of effluent total phosphorus data (11/1/2021 - 10/31/2024, n=64) yield a 30-day P99 value of 2.08 mg/L.

Note: See description in Section 2.02 of the MDV implementation guidance. Interim limitations should reflect the "highest attainable condition" for the permittee in question pursuant to s. 283.16(7), Wis. Stat.

9. *For Industries Only*- Where does the phosphorus in the effluent come from? (check all that apply)	☐ Process ☐ Additive Usage ☐ Water supply *Can intake credits be given or can the facility use an alternative water supply?* ◯ Not feasible ◯ Possibly, but further analysis needed ◯ Not evaluated at this time	*See Q14-15 & 19 on industrial form. If the answer is "possibly" or "not evaluated", the schedule section of the MDV permit should contain a requirement to perform this analysis.*
10. Has this facility optimized?	◉ Yes ◯ In progress ◯ No	*See Q14 on municipal form & Q16 & 20 on industrial form. Facility must optimize and operate at an optimize treatment level (s. 283.16(6)(a), Wis. Stat.)If no will need compliance schedule.*
11. Has a facility plan/compliance alternative plan been completed for the facility?	◉ Yes ◯ In progress ◯ No	*See Q15 on municipal form & Q17 on industrial form.*
12. What is the projected cost for complying with phosphorus? Source:	$ 2,039,512.00 Site specific cost estimate (capital costs) provided in the March 2019 Final Compliance Alternatives Plan	*Facility must submit site-specific compliance costs. If cost projections are used from EIA, the permittee must certify that these costs are reasonable for the facility in question. See "projected compliance costs" in Section 2.02 of the MDV Implementation Guidance for details.*

Comments on planning efforts:

The final compliance alternatives plan, Dated March 2019 prepared by Cedar Corporation for Lebanon Sanitary District #1, evaluates alternatives to and options for meeting the final WQBEL for phosphorus. The report described challenges associated with the small geographic area allowed for water quality trading. The application states that adaptive management is not an option due to a 60/40 point to nonpoint P loading ratio in the receiving water. A site specific cost estimate was provided for Lebanon Sanitary District #1 to conduct a major facility upgrade to meet the final WQBEL for phosphorus. The estimate was for a reactive sand filtration unit, which could be added to the end of the treatment train. The cost estimate was used in the economic demonstration. Although the cost estimate is from 2019, the recent cost increases due to inflation render the unchanged $2M value conservative as of 2025.

13. Are adaptive management and water quality trading viable?	◯ Yes ◉ Perhaps. Additional analysis required. ◯ No	*See Q18-21 on municipal form & Q22-25 on industrial form. If additional analyses required, the applicant may need to complete this analysis during the MDV permit term.*
14. Has the point source met the appropriate primary screener?	◉ Yes ◯ No. *STOP- facility not eligible.*	*See Q4 of this form in addition to the "eligibility" guidance in Section 2.01 of the MDV Implementation Guidance.*

Comments on economic demonstration:

A site specific cost estimate was provided for a Blue Pro Reactive Media Filtration unit. Capital costs were $2,039,512.00 and O&M costs were $34,500 annually. These values were similar to the EIA addendum Appendix G values of $1,898,378 (capital) and $29,020 (O&M). These upgrades represent an additional annual cost of $144,755.59 per year, with a 20 year loan at 2.6% interest rate. This cost, shared amongst 110 residential users and an assumed 90% residential use rate, represents an annual average per-user increase of $1351.96. The increase alone is 2.6% of the user's MHI of $49,821. Therefore, Lebanon Sanitary District meets the primary economic screener of 1% MHI sewer rate impacts in a county with a secondary indicator score of 3 or greater.

15. What watershed option was selected?

- (◉) County project option. *Complete Section 5.*
- ( ) Binding, written agreement with the DNR to construct a project or implement a watershed plan. *Complete Section 4.*
- ( ) Binding, written agreement with another person that is approved by the DNR to construct a project or implement a watershed plan. *Complete Section 4.*

Section 4. Watershed Plan Review

16. MDV Plan Number: *Note: This is for tracking purposes. Contact Statewide Phosphorus Implementation Coordinator for the plan number.*	_____
17. Did the point source complete Form 3200-148?	( ) Yes ( ) No
18. Is the project area in the same HUC 8 watershed as the point of discharge?	( ) Yes ( ) No. *STOP- Watershed plan must be updated.*
19. What is the annual offset required? *See Section 2.03 of the MDV implementation guidance. If this value is different from the offset target provided in form 3200-148, the watershed plan should be amended.*	_____
20. Does the plan ensure that the annual load is offset annually?	( ) Yes ( ) No. *STOP- Watershed plan must be updated.*

21. Are projects occurring on land owned/operated by a CAFO or within a permitted MS4 boundary?

- ( ) Yes. *Work with appropriate DNR staff to ensure projects are not working towards other permit compliance.*
- ( ) No.

22. Are other funding sources being used as part of the MDV watershed project?

- ( ) Yes. *Work with appropriate DNR staff to ensure that funding sources can be appropriately used in the plan area.*
- ( ) No.

23. Do you have any concerns about the watershed project? *Note: Coordinate with other DNR staff as appropriate.*	( ) Yes. *STOP- Watershed plan must be updated.* ( ) No.

Comments:

Section 5. Payment to the County(ies)

24. At this time, the appropriate per pound payment is: $ 66.62

See "Payment Calculator" document at
\\central\water\WQWT_PROJECTS\WY_CW_Phosphorus\MDV.

Section 6. Determination

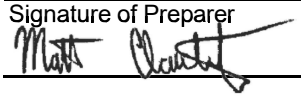
Based on the available information, the MDV application is:

- (◉) Approved
- ( ) Request for more information
- ( ) Denied

Additional Justification (if needed):

It should be noted that the MDV application, variance request schedule incorrectly checked 1 - 3. Only #1 applies.

The variance does not apply to Rock River TMDL limits.

Certification		
Preparer Name	Title	
Matt Claucherty	Water Resources Management Specialist	
Signature of Preparer 		Date 11/7/2025