### **Osseo Pubic Noticed Permit Fact Sheet**

#### **General Information**

Permit Number	WI-0025046-12-0
Permittee	City of Osseo, 13712 W 8th St P O Box 308, Osseo, WI 54758
Permitted Facility	Osseo Wastewater Treatment Facility, 50562 Honey Ln., Osseo, WI
Permit Term	January 01, 2026 to December 31, 2030
Discharge Location	SE 1/4 of the SW 1/4 of Section 8, T24N, R07W, Town of Summer
Receiving Water	the groundwaters of Upper Buffalo River Watershed of the Buffalo-Trempealeau River Basin in Trempealeau County
Annual Average Design Flow (MGD)	0.207 MGD
Industrial or Commercial Contributors	None
Plant Classification	A1 - Suspended Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; N - Total Nitrogen; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

# **Facility Description**

The City of Osseo owns and operates the Osseo Wastewater Treatment Facility (WWTF) for treatment of wastewater from the City of Osseo. In 2022 the Department approved a facility plan submitted by the City of Osseo to upgrade their treatment facility. The new WWTF was put online on April 29th, 2025 and has an annual average design flow of 0.207 MGD. This upgrade involved rehabilitation of existing absorption ponds/seepage cells to allow for final land disposal/land treatment of the treated effluent to groundwater. The wastewater treatment plant has the following treatment: fine screening, grit removal, oxidation ditch and final clarification. Treated effluent has a final discharge to seepage cells and groundwater. Return activated sludge (RAS) and waste activated sludge (WAS) sludge is dewatered to a cake and then land applied on department approved fields.

### **Substantial Compliance Determination**

**Enforcement During Last Permit**: Osseo wastewater treatment facility (WWTF) received a notice of noncompliance (NON) in November 2022 for late and missing reports including a number of zinc reports as well as a nitrogen series test, and a phosphorus short form. The facility put together a standard operating procedure for sampling to prevent future missed reports and had no issues following these occurrences. The facility did report a sanitary sewer overflow in 2020, but after review it was a bypass to save the plant from overflowing during a sever rain event. The event was reported correctly and appropriate action was taken.

After a desk top review of all discharge monitoring reports, CMARs, Land application reports, and compliance schedule items, and an inspection on 05/07/2025, Osseo WWTF has been found to be in substantial compliance with their current permit.

Compliance determination made by Jenna Monahan on 05/13/2025.

# **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)					
702	Influent: no flow measurement before now. Flow monitoring added this permit term.	Representative influent samples shall be collected prior to all treatment and introduction of all sidestreams.					
007	Effluent to seepage cells: 0.23 MGD (May – Sept 2025)	Representative effluent samples shall be collected prior to discharge to the seepage cells.					
005	Cake sludge from preupgrade treatment facility	Representative composite cake sludge samples shall be collected from a truckload of waste prior to land application and monitored for the parameters as listed below. This sludge outfall is for sludge land applied from the preupgrade WWTF. The permittee shall notify the Department 7 days in advance of discontinued use of this outfall.					
006	Cake sludge from postupgrade treatment facility	Representative composite cake sludge samples shall be collected from a truckload of waste prior to land application and monitored for the parameters as listed below. This sludge outfall is for sludge land applied from the postupgrade WWTF.					

Sample Point Designation For Groundwater Monitoring Systems					
System Sample Pt Number Well Name Comments					
Seepage Cells	801	MW-1	Background		
Seepage Cells	802	MW-2	Non-Point of Standard		
Seepage Cells	805	MW-5	Non-Point of Standard		

# **Permit Requirements**

# 1 Influent – Monitoring Requirements

# 1.1 Sample Point Number: 702-INFLUENT PRIOR TO SIDESTREAMS

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	

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

### 1.1.1 Changes from Previous Permit:

Influent limitations and monitoring requirements were evaluated for this permit term. The following changes were made this permit term" 1) the addition of flow monitoring and 2) a reduction in the BOD & TSS monitoring frequency from 3/week to 2/week.

#### 1.1.2 Explanation of Limits and Monitoring Requirements

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

# 2 Land Treatment – Monitoring and Limitations

### 2.1 Sample Point Number: 006- EFFLUENT TO SEEPAGE CELLS

Monitoring Requirements and Limitations						
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes	
Flow Rate		gpd	Daily	Continuous		
BOD5, Total	Monthly Avg	50 mg/L	2/Week	Composite		
Nitrogen, Total	Monthly Avg	10 mg/L	2/Week	Calculated		
Nitrogen, Organic Total		mg/L	2/Week	Calculated		
Nitrogen, Total Kjeldahl		mg/L	2/Week	Composite		
Nitrogen, Nitrite + Nitrate Total		mg/L	2/Week	Composite		
Solids, Total Dissolved	Monthly Avg	750 mg/L	2/Week	Composite		
Nitrogen, Ammonia (NH3-N) Total		mg/L	2/Week	Composite		
Chloride	Monthly Avg	300 mg/L	4/Month	Composite	Samples shall be collected on 4 consecutive days each month	

## **Changes from Previous Permit:**

Effluent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit: 1) an increase in the monthly average limits for TDS and chloride, 2) TKN monitoring added monitoring, 3) the monitoring frequency of most parameters increased from monthly to 2/month, 4) the monitoring frequency of chloride increased from monthly to 4/month on four consecutive days each month, 5) grab sample types at changed to composite, 6) flow sample type changed from total daily to continuous for eDMR reporting purposes, and 7) addition of volume per cell reporting requirement at the daily log.

### **Explanation of Limits and Monitoring Requirements**

All requirements for land treatment of municipal wastewater are determined in accordance with ch. NR 206, Wis. Adm. Code. All categorical limits are based on s. NR 206.08(1) Wis. Adm. Code. More information on the limitations can be found in the July 18, 2025 groundwater evaluation from Woody Myers titled "Groundwater Evaluation for Osseo Wastewater Treatment Facility, WI-0025046 – Amended April 25, 2025 Groundwater Evaluation".

## 3 Groundwater – Monitoring and Limitations

# 3.1 Groundwater Monitoring System for Seepage Cells

Location of Monitoring system: SE 1/4 of the SW 1/4 of Section 8, T24N, R07W, Town of Summer

Groundwater Monitoring Well(s) to be Sampled: 801 (MW-1), 80 (MW-2), 805 (MW-5)

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: 801 (MW-1)

Groundwater Monitoring Well(s) Used for Point of Standards Application: None

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	Quarterly
Groundwater Elevation	feet MSL	N/A	N/A	Quarterly
Chloride Dissolved	mg/L	125	250	Quarterly
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	Quarterly
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	Quarterly
Nitrogen, Organic Dissolved	mg/L	N/A	N/A	Quarterly
Solids, Total Dissolved	mg/L	N/A	N/A	Quarterly
pH Field	su	N/A	N/A	Quarterly

### **Changes from Previous Permit:**

Groundwater limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit: Groundwater monitoring wells 803 and 804 have been abandoned and replaced by well 805.

### **Explanation of Limits and Monitoring Requirements**

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20, Wis. Adm. Code.

For more information, please refer to the July 18, 2025 groundwater evaluation from Woody Myers titled "Groundwater Evaluation for Osseo Wastewater Treatment Facility, WI-0025046 – Amended April 25, 2025 Groundwater Evaluation".

# 4 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)		
005	В	Cake	Fecal	Incorporation	Land App	50 MT in 2024		
			Coliform			46 MT in 2023		
						58 MT in 2022		
						50 MT in 2022		
007	В	Cake	Fecal Coliform	Incorporation	Land App	No sludge has been landspread at this outfall as of permit reissuance		

Does sludge management demonstrate compliance? Yes

Is additional sludge storage required? No

Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? No

Is a priority pollutant scan required? No

Priority pollutant scans are required once every 10 years at facilities with design flows between 5 MGD and 40 MGD, and once every 5 years if design flow is greater than 40 MGD.

### 4.1 Sample Point Number: 005- PREUPGRADE SLUDGE and 007- SLUDGE

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

	Monitoring Requirements and Limitations						
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes		
Nickel Dry Wt	Ceiling	420 mg/kg	Annual	Composite			
Nickel Dry Wt	High Quality	420 mg/kg	Annual	Composite			
Selenium Dry Wt	Ceiling	100 mg/kg	Annual	Composite			
Selenium Dry Wt	High Quality	100 mg/kg	Annual	Composite			
Zinc Dry Wt	Ceiling	7,500 mg/kg	Annual	Composite			
Zinc Dry Wt	High Quality	2,800 mg/kg	Annual	Composite			
Nitrogen, Total Kjeldahl		Percent	Annual	Composite			
Nitrogen, Ammonium (NH4-N) Total		Percent	Annual	Composite			
Phosphorus, Total		Percent	Annual	Composite			
Phosphorus, Water Extractable		% of Tot P	Annual	Composite			
Potassium, Total Recoverable		Percent	Annual	Composite			
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Once in 2027		
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Once in 2027		
PFOA + PFOS		ug/kg	Annual	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.		
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.		

### **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: to quantitate the risk, annual PFAS sludge sampling has been included in the permit pursuant to s. NR 204.06(2)(b)9., Wis. Adm. Code.

### **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.

#### 5 Schedules

### 5.1 Land Treatment Management Plan

Required Action	<b>Due Date</b>
Land Treatment Management Plan Submittal: Submit an update to the management plan to optimize the land treatment system performance and demonstrate compliance with ch. NR 206, Wis. Adm. Code. The land treatment system shall be operated in accordance with the approved management plan.	03/31/2026
Included in the Plan update shall be the following: All monitoring well locations shall be reported to the department on a plan map drawn to a specific scale. The exact latitude/longitude location of the groundwater monitoring wells shall be included, in decimal degrees. The map shall indicate structure boundaries, property boundaries, any nearby surface waters and a north arrow. The plan shall show the wells in relation to each other, to property and structure boundaries and to a common reference point on a horizontal grid system. The origin of the grid system shall be located according to latitude and longitude or according to the state plane coordinate system. The exact vertical location of the top of the well casing shall be referenced to the nearest benchmark for the national geodetic survey datum to an accuracy of 0.01 feet. This plan map shall show the exact location of the installed well on a horizontal grid system which is accurate within 1 foot. The groundwater monitoring well latitude/longitude need to be provided in decimal degrees.	

**Explanation of schedule:** An up-to-date Land Treatment Management plan is a standard requirement in reissued industrial permits per ch. NR 214, Wis. Adm. Code.

### 5.2 Chloride Source Reduction Measures (SRMs) for Groundwater Discharges

Required Action					
Chloride Reduction: The permittee shall complete and submit for Department review and approval a chloride reduction plan (CRP). The CRP is an initial step toward controlling chloride and ensuring compliance with chloride limits based on applicable groundwater standards. The CRP shall evaluate all applicable source reduction measures (SRMs) and establish appropriate implementation activities for the SRMs. The CRP shall include a schedule for implementing the selected SRMs.	12/31/2026				
<b>Annual Progress Report</b> : Once the chloride reduction plan (CRP) is approved by the Department, the permittee shall submit an annual progress report, under the authority of s. NR 205.07(1)(h), Wis. Adm. Code. If a SRM implementation date of an approved CRP is not met, this may constitute a violation of the permit. Submittal of the first annual progress report is required by the Date Due.	12/31/2027				

Annual Progress Report: Submit progress report in implementing the CRP.				
Annual Progress Report: Submit progress report in implementing the CRP.	12/31/2029			
Annual Progress Report: Submit progress report in implementing the CRP.	12/31/2030			

**Explanation of Schedule**: The department granted a s. NR 206.06 Wis. Adm. Code alternate land disposal sampling point (effluent) chloride limit of 300 mg/l monthly average. As a condition of this exemption the department is requiring Osseo perform chloride source reduction measures. The intent is to investigate any potential chloride sources and actions to reduce chloride concentrations in the wastewater.

### 5.3 Operator Certification

Required Action	<b>Due Date</b>
<b>Operator Certification</b> : By the due date, per s. NR 114.53 Wis. Adm. Code, the permittee shall have an operator in charge with the proper certification in all appropriate subclasses (A1, B, C, N, and SS) as well as achieve advance certification. Within 30 days of receiving certification, the permittee shall notify the department in writing of the certified operator's name and certification number with all proper certifications.	04/29/2026

**Explanation of schedule**: Per s. NR 114.53 Wis. Adm. Code, Osseo WWTF must have an operator in charge that holds all certifications at the proper level.

### **Other Comments**

Publishing Newspaper: The Tri-County News, PO Box 460, Osseo, WI 54758-0460

### **Attachments**

NR 140 Groundwater Evaluation Report

### **Justification Of Any Waivers From Permit Application Requirements**

No waivers requested or granted as part of this permit reissuance

Prepared By: Holly Heldstab, Wastewater Specialist Date: 11/05/2025

DATE:

July 18, 2025

TO:

File

FROM:

Woody Myers - WCR 7

SUBJECT: Groundwater Evaluation for Osseo Wastewater Treatment Facility, WI-0025046 - Amended

April 24, 2025 Groundwater Evaluation

#### **Site Information**

The Osseo Wastewater Treatment Facility, a municipal facility is located at 50562 Honey Lane, Osseo, Trempealeau County. Wastewater is currently treated and discharged to the Buffalo River. The permittee will recently switched their discharge from surface water to groundwater via absorption ponds (seepage cells) located in the SE 1/4 of the SW 1/4 of Section 8, T24N, R07W, Town of Summer.

### Land Disposal Effluent & Groundwater Evaluation Summary

#### Table 1 Land Disposal Outfall Sampling Point Parameters and Limits **Outfall 006 Absorption Ponds**

To state the district of the second s	Current Permit WI-0025046-11-1		Proposed Permit WI-0025046-12		
Parameter	Limits and Units	Limit Type	Limits and Units	Limit Type	
Flow Rate	- MGD		- MGD	,	
BOD <sub>5</sub>	50 mg/l	Monthly Avg	50 mg/l	Monthly Avg	
Nitrogen, Total	10 mg/l	Monthly Avg	10 mg/l	Monthly Avg	
Nitrogen, Organic	- mg/l	A Signal Control of the Control of t	- mg/l		
Nitrogen, Nitrite + Nitrate	- mg/l		- mg/l		
Total Dissolved Solids	500 mg/l	Monthly Avg	*750 mg/l	Monthly Avg	
Nitrogen. Ammonia	- mg/l		- mg/l		
Chloride	250 mg/l	Monthly Avg	*300 mg/l	Monthly Avg	

<sup>\*</sup> Proposed permit changes

#### **Table 2 Monitoring Wells**

Well	Cur	rent Permit	Proposed Permit		
	WI-0	025046-11-1	WI-0025046-12		
	Well Location	Well Designation	Well Location	Well Designation	
801 (MW-1)	Up-gradient	Background	Up-gradient	Background	
802 (MW-2)	Down-gradient	Non-Point of Standard	Down-gradient	Non-Point of Standard	
803 (MW-3)	Down-gradient	Non-Point of Standard	*Abandoned		
804 (MW-4)	Down-gradient	Non-Point of Standard	*Abandoned		
805 (MW-5)	Down-gradient	Non-Point of Standard	Down-gradient	Non-Point of Standard	

<sup>\*</sup> Proposed permit changes



**Table 3 Groundwater Quality Standards** 

Parameter		t Permit 046-11-1	Proposed WI-0025046-12		
	PAL	ES	PAL	ES	
Depth to Groundwater	****	N/A	N/A	N/A	
Groundwater Elevation	****	N/A	N/A	N/A	
Chloride	125 mg/l	250 mg/l	125 mg/l	250 mg/l	
Nitrogen, Nitrite + Nitrate	2.0 mg/l	10.0 mg/l	2.0 mg/l	10.0 mg/l	
Nitrogen, Ammonia	0.97 mg/l	9.7 mg/l	0.97 mg/l	9.7 mg/l	
Nitrogen, Organic	****	N/A	- mg/l	N/A	
Total Dissolved Solids	****	N/A	- mg/l	N/A	
pH, Field	****	N/A	- su	N/A	

<sup>\*</sup> Proposed permit changes

#### Geology

The bedrock under this facility is the Eau Claire Formation which is comprised of a subangular poorly sorted fine-grained sandstone. Glauconite deposits are common with flaggy beds separated by green shale (*Bedrock Geology of Wisconsin, Regional Map Series West-Central Sheet*, Wisconsin Geological and Natural History Survey (WGNHS), 1988). Bedrock is anticipated to be between 50 and 100 feet below ground surface (bgs) (*Depth to Bedrock in Wisconsin*, WGNHS, 1973). The regolith consists of material ranging from silt to coarse sand. Surface soil primarily consists of the Gosil loamy sand (USDA NRCS Web Soil Survey).

#### Hydrogeology

Regional groundwater is to the Northwest in this area of Trempealeau County (Generalized Water-Table Elevation Map of Trempealeau County, Wisconsin, WGNHS, 1998). The site is approximately 1,200 feet southeast of Buffalo River and approximately 1,500 feet east of King Creek. There are two wells (municipal, other than municipal, private and high-capacity) within a 1,500-foot range of this facility's groundwater discharge.

#### Land Disposal Effluent Quality and Loading Rates

The absorption ponds were placed back into operation on April 30, 2025.

#### **Groundwater Monitoring System and Sampling Frequency**

All parameters are analyzed for the dissolved phase in groundwater. Established groundwater quality standards are found in Table 1 Public Health Groundwater Quality Standards s. NR 140.10 Wis. Adm. Code, and Table 2 Public Welfare Groundwater Standards s. NR 140.12 Wis. Adm. Code. The thresholds of these standards are the Enforcement Standard (ES) and the Preventative Action Limit (PAL).

**Table 4 Groundwater Monitoring Well Data** 

		Elevation (feet above msl)			Length (feet)			
Sample Point	Well Name	Casing Top	Ground Surface	Screen Top	Screen Bottom	Screen Length	Well Depth	Well Type
801	MW-1	962.66	961.1	921.1	916.1	5.0	45.0	WT
802	MW-2	944.33	942.9	918.9	913.9	5.0	29.0	WT
803		Abandoned						
804		Abandoned						
805	MW-5	948.49	946.0	934.0	924.0	10.0	22.0	WT

All measurements in feet

WT-Water table Observation P-Piezometer O-Other

Groundwater sampling results from this facility have been analyzed for each well to evaluate trends of the regulated compounds in groundwater and to calculate PALs for s. NR 140.22 Wis. Adm. Code Indicator Parameters and to evaluate potential exemptions under s. NR 140.28 Wis. Adm. Code.

#### **Proposed Groundwater Monitoring Requirements**

Table 5 Groundwater Quality Sampling Frequency and Limits Permit WI-0025046-12
Outfall 006

Sample Point	Well Name	Sample Frequency	Well Designation
801	MW801	Quarterly	Background
802	MW802	Quarterly	Non-Point of Standard
805	MW805	Quarterly	Non-Point of Standard
Parameter	PAL	ES	Source
Depth to Groundwater	N/A	N/A	Measured
Groundwater Elevation	N/A	N/A	Measured
Chloride	125 mg/l	250 mg/l	NR 140 Table 2
Nitrogen, Nitrite + Nitrate	2.0 mg/l	10.0 mg/l	NR 140 Table 1
Nitrogen, Ammonia	0.97 mg/l	9.7 mg/l	NR 140 Table 1
Nitrogen, Organic	- mg/l	N/A	Calculated
Total Dissolved Solids	- mg/l	N/A	Calculated
pH, Field	- su	N/A	Calculated

<sup>\*</sup> Proposed permit changes

#### Conclusions

Since the original groundwater evaluation was finalized April 24, 2024, two changes have been recommended for the effluent sampling point parameters or limits to the existing parameters. The limits for chloride and TDS have been increased from 250 mg/l to 300 mg/l and 500 mg/l to 750 mg/l respectively. This change is approved through s. NR 206.06 Wis. Adm. Code based on protection of groundwater quality standards. These changes are due to elevated levels of TDS and chloride discovered in the treated effluent from the new WWTF. See the compliance schedule recommendations for additional information.

Groundwater monitoring wells 803 and 804 have been abandoned and replaced by well 805.

Indicator parameter PALs and exemptions could not be calculated due to the low number of groundwater sampling results. However, per s. NR 140.24 Wis. Adm. Code the up-gradient (background) groundwater data will be considered if there are any exceedances in the down-gradient groundwater monitoring wells.

#### **Compliance Schedule Recommendations**

The s. NR 206.07 (2)(h) 1. Wis. Adm. Code requires a land disposal management plan for facilities with land disposal systems. The facility should review their plan within 90 days of permit reissuance and any revisions should be submitted to the department for approval.

It is recommended that the permittee provide a chloride reduction plan to investigate and report options for chloride reduction in the effluent discharged to the absorption pond system. The facility should investigate sources and options for reduction in the first year after permit reissuance and in the second year provide a report with implementation of the options.