Public Noticed Draft River Falls WWTF Permit Fact Sheet

General Information

Permit Number	WI-0029394-11-0
Permittee Name and Address	River Falls Municipal Utility WWTF 222 Lewis St Suite 228, River Falls, WI 54022
Permitted Facility Name and Address	River Falls Municipal Utility WWTF 432 S Apollo Rd, River Falls, WI
Permit Term	January 01, 2026 to December 31, 2030
Discharge Location	River Falls WWTF, 432 S. Apollo Rd, River Falls, WI 54022
Receiving Water	Kinnickinnic River in Kinnickinnic River Watershed of St Croix River Basin in Pierce County
Stream Flow ($Q_{7,10}$)	26 cfs
Stream Classification	Classification used in accordance with chs. NR 102 and 104, Wis. Adm. Code: Less than ½ mile downstream from the outfall location, the Kinnickinnic River is classified as an Outstanding Resource Water (ORW), Cold Water (Category 4), Class I trout stream, non-public water supply.
Discharge Type	Existing, continuous
Annual Average Design Flow (MGD)	1.824 MGD
Industrial or Commercial Contributors	1) Crystal Finishing, a metal finishing company that uses a coating application, and 2) Best Maid Baking, a maker of baked goods using flour, eggs, sugar, etc.
Plant Classification	A1 - Suspended Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; P - Total Phosphorus; D - Disinfection; L - Laboratory; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

The River Falls Municipal Utility wastewater treatment facility (River Falls WWTF) has an annual average design flow of 1.824 million gallons per day (MGD) and had an actual annual average influent flow of 1.38 MGD in 2024. River Falls WWTF treats domestic wastewater from the City of River Falls and industrial wastewater from Crystal Finishing, a metal finishing company, and Best Maid Baking, a maker of baked goods. Primary treatment consists of 2 communitors/bar screen, 4 pump lift stations, magnetic flow metering, a Huber Rotomat, vortex grit removal, and classifier. Secondary treatment includes two parallel oxidation ditches, two final clarifiers, and a biological anaerobic phosphorus (Bio P) reduction unit. In addition to the Bio P unit, Alum from an Alum Tank is available for use if required. Chlorination is achieved in two baffled units, then dechlorinated by injecting sulfur dioxide into the baffled unit between the chlorination chamber and the effluent weir. Following de-chlorination, the treated wastewater is discharged through a 14" outfall pipe to the Kinnickinnic River, which discharges above the normal water level of the river over a rip-rap area. Biosolids are treated using a Dissolved Air Flotation (DAF) unit, which transfers them to a holding tank, where the sludge undergoes further processing through a screw press, drying, and storage for land application or distribution. This process will produce Class A or Exceptional Quality (EQ) sludge. If the sludge does not meet Class A or EQ requirements, it is

processed along the sludge treatment train. In that case, River Falls can, depending on which point along the wastewater treatment train it occurs, ship the sludge to the West Central Wisconsin Biosolids Facility (WCWBF) for further treatment and disposal, Land apply it as Class B Sludge, or send it to a landfill. Pressate and condensate from the River Falls sludge processing is fed back into the treatment train, in addition to at times centrate from the WCWBF which is projected to be infrequent. Changes in permit requirements proposed for this issuance include 1) the addition of monitoring for effluent PFOS and PFOA once every two months and an associated determination of need schedule in accordance with s. NR 106.98(2)(b), Wis. Adm. Code., 2) addition of effluent limit of mercury and an associated compliance schedule to address the new limit, 3) new sludge sample points to reflect class A sludge production, 4) new PFAS sludge sampling has been included in the permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code to quantitate risk, 5) sludge monitoring frequency was increased to quarterly to conform to Table A, Ch NR 204, Wis. Adm. Code, and 6) an updated land management plan to address the class A sludge requirements.

Substantial Compliance Determination

Enforcement During Last Permit: While there were no enforcement actions this permit term, River Falls Municipal Utility WWTF (River Falls) had some missing data, and exceedances that might have been errors and these have been addressed.

After a desk top review of all discharge monitoring reports, CMARs, land app reports, compliance schedule items, and a compliance inspection on 09/17/2025, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Adebowale Adesanwo on 9/17/2025.

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)**
701	1.38 MGD (2024)	Representative influent samples shall be collected prior to the rotating screens.
001	1.40 MGD (2024)	Representative effluent samples shall be collected after dechlorination and prior to discharge to Lower Kinnickinnic Pond.
002	385 US Dry tons of sludge to West Central Wisconsin Biosolids Facility (WCWBF) in 2024	Liquid Sludge: Class B, Waste Activated, Dissolved Air Floatation thickened sludge. When sludge is hauled, monitoring shall include List 1 parameters and PFAS. When sludge is land applied, monitoring shall include List 1, 2, 3 and 4 parameters and PFAS.
004	New	Cake Sludge: Class B, Waste Activated, Dissolved Air Floatation Thickened, Screw press dewatered sludge. Sludge shall be sampled from the screw press and/or storage, and monitoring is required when sludge is land applied or landfilled from this outfall. When sludge is land applied, monitoring shall include List 1, 2, 3 and 4 parameters and PFAS. When sludge is landfilled, monitoring shall include List 1 parameters and PFAS.
005	New	Heat Dried Sludge: Class A, Heat Dried biosolids immediately after the Class A treatment process. Quarterly monitoring of continuous temperature monitoring (>80 deg C), daily monitoring for percent moisture (<10% moisture), and fecals (<1000 MPN/g TS)

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**
		monitoring of 7 discrete samples during each monitoring period is required.
006	New	Heat Dried Sludge: Class A, Heat Dried biosolids discharged after the Class A treatment process (no storage.) Heat drying following waste activated, dissolved air floatation thickened screw press dewatered sludge. Monitoring is required when sludge is land applied or landfilled from this outfall. When sludge is land applied, monitoring shall include List 1, 2, 3 and 4 parameters and PFAS. When sludge is landfilled, monitoring shall include List 1 parameters and PFAS.
007	New	Heat Dried Sludge: Class A, Heat Dried biosolids from silo storage. Heat drying following waste activated, dissolved air floatation thickened screw press dewatered sludge. Representative samples of heat dried sludge shall be collected from the silo storage and monitoring is required when sludge is land applied or landfilled from this outfall. When sludge is land applied, monitoring shall include List 1, 2, 3 and 4 parameters and PFAS. When sludge is landfilled, monitoring shall include List 1 parameters and PFAS.
106	N/A	The field blank shall be collected using standard handling procedures every day that mercury samples are collected at influent and effluent.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- PRIOR TO STATIC SCREEN

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	
BOD5, Total		mg/L	Daily	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	Daily	24-Hr Flow Prop Comp	
Mercury, Total Recoverable		ng/L	Quarterly	24-Hr Flow Prop Comp	Sample concurrently with mercury effluent samples

1.1.1 Changes from Previous Permit:

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

1.1.2 Explanation of Limits and Monitoring Requirements

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

Mercury monitoring of the influent, in plant, and effluent sample points shall be conducted at the same time.

2 Inplant - Monitoring and Limitations

2.1 Sample Point Number: 106- Field Blank

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Mercury, Total Recoverable		ng/L	Quarterly	Blank	Sample concurrently with mercury effluent samples

2.1.1 Changes from Previous Permit:

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

2.1.2 Explanation of Limits and Monitoring Requirements

Mercury Field Blank- Monitoring is included in the permit pursuant to s. NR 106.145, Wis. Adm. Code. Field blanks must meet the requirements under s. NR 106.145(9) and (10), Wis. Adm. Code. The permittee shall collect a mercury field blank for each set of mercury samples (a set of samples may include a combination of influent, effluent or other samples all collected on the same day). Field blanks are required to verify a sample has not been contaminated during collection, transportation or analysis.

3 Surface Water - Monitoring and Limitations

3.1 Sample Point Number: 001- AFTER THE CHLORINE TANK

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Monthly Avg	30 mg/L	Daily	24-Hr Flow Prop Comp	Limit applies year round.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
BOD5, Total	Weekly Avg	45 mg/L	Daily	24-Hr Flow Prop Comp	Limit applies Nov-Apr
BOD5, Total	Weekly Avg	31 mg/L	Daily	24-Hr Flow Prop Comp	Limit applies May-Oct
BOD5, Total	Weekly Avg	465 lbs/day	Daily	Calculated	Limit applies May-Oct
Suspended Solids, Total	Monthly Avg	30 mg/L	Daily	24-Hr Flow Prop Comp	Limit applies year round.
Suspended Solids, Total	Weekly Avg	45 mg/L	Daily	24-Hr Flow Prop Comp	Limit applies Nov-Apr
Suspended Solids, Total	Weekly Avg	31 mg/L	Daily	24-Hr Flow Prop Comp	Limit applies May-Oct
Suspended Solids, Total	Weekly Avg	465 lbs/day	Daily	Calculated	Limit applies May-Oct
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Nitrogen, Ammonia (NH3-N) Total	Daily Max	35 mg/L	3/Week	24-Hr Flow Prop Comp	Limit applies Nov-Apr
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	5.7 mg/L	3/Week	24-Hr Flow Prop Comp	Limit applies Nov-Apr
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	2.0 mg/L	3/Week	24-Hr Flow Prop Comp	Limit applies May-Oct
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	7.5 mg/L	3/Week	24-Hr Flow Prop Comp	Limit applies Nov-Apr
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	2.0 mg/L	3/Week	24-Hr Flow Prop Comp	Limit applies May-Oct
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	30 lbs/day	3/Week	Calculated	Limit applies May-Oct
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	113 lbs/day	3/Week	Calculated	Limit applies Nov-Apr
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg - Variable	lbs/day	3/Week	Calculated	Either 86 or 94 lbs/day limit applies Nov-Apr. See Wet Weather footnote below.
E. coli	Geometric Mean - Monthly	126 #/100 ml	2/Week	Grab	Limit applies May - Sept. See E. coli footnote below.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit applies May - Sept. See E. coli footnote below.
Chlorine, Total Residual	Daily Max	38 ug/L	Daily	Grab	Limit applies May - Sept
Chlorine, Total Residual	Monthly Avg	24 ug/L	Daily	Grab	Limit applies May - Sept
Chlorine, Total Residual	Weekly Avg	24 ug/L	Daily	Grab	Limit applies May - Sept
Mercury, Total Recoverable	Monthly Avg	1.3 ng/L	Quarterly	Grab	Monitoring required upon permit issuance. Limit may apply in Dec 2030. See Mercury footnote below and Schedules section.
Mercury, Total Recoverable	Weekly Avg	1.3 ng/L	Quarterly	Grab	Monitoring required upon permit issuance. Limit may apply in Dec 2030. See Mercury footnote below and Schedules section.
Mercury, Total Recoverable	Monthly Avg - Variable	mg/day	Quarterly	Calculated	Monitoring required upon permit issuance. Either 9 or 10 mg/day limit may apply in Dec 2030. See Wet Weather and Mercury footnotes below and Schedules section.
Mercury Variable Limit		mg/day	Quarterly	Calculated	Monitoring required upon permit issuance. Limit may apply in Dec 2030. See Wet Weather and Mercury footnotes below and Schedules section.
PFOS		ng/L	1/ 2 Months	Grab	See PFOS/PFOA footnote below and Schedules section.
PFOA		ng/L	1/ 2 Months	Grab	See PFOS/PFOA footnote below and Schedules section.
Phosphorus, Total	Monthly Avg	1.0 mg/L	Daily	24-Hr Flow Prop Comp	
Phosphorus, Total	Monthly Avg	20 lbs/day	Daily	Calculated	See TMDL footnote below.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Phosphorus, Total		lbs/yr	Annual	Calculated	See TMDL footnote below.
Phosphorus, Total		lbs/month	Monthly	Calculated	See TMDL footnote below.
Nitrogen, Total Kjeldahl		mg/L	Quarterly	24-Hr Flow Prop Comp	See Nitrogen Series footnote section.
Nitrogen, Nitrite + Nitrate Total		mg/L	Quarterly	24-Hr Flow Prop Comp	See Nitrogen Series footnote section.
Nitrogen, Total		mg/L	Quarterly	Calculated	See Nitrogen Series footnote section.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET footnote section.
Chronic WET		TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET footnote section.

3.1.1 Changes from Previous Permit

Effluent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under "Explanation of Limits and Monitoring Requirements" below.

PFOS and PFOA – addition of once every two months monitoring and an associated determination of need schedule in accordance with s. NR 106.98(2)(b), Wis. Adm. Code.

Mercury – addition of limits and an associated compliance schedule.

Ammonia Nitrogen, Chlorine, and Mercury – monthly and weekly average limits have been added in accordance with the federal regulation 40 CFR 122.45(d) and s. NR 205.065, Wis. Adm. Code

3.1.2 Explanation of Limits and Monitoring Requirements

Detailed discussions of limits and monitoring requirements can be found in the attached water quality-based effluent limits (WQBEL) and technologically based limits (TBEL) memo dated September 11, 2025 and titled **"**Water Quality-Based Effluent Limitations for the River Falls Municipal Utility WWTF WPDES Permit No. WI-0029394."

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.

Phosphorus - Chapter NR 217, Wis. Adm. Code. specifies WQBELs for discharges of phosphorus to surface waters of the state. WQBELs for phosphorus are needed whenever the discharge contains phosphorus at concentrations or loadings that will cause or contribute to an exceedance of the water quality standards.

Lake St. Croix Total Maximum Daily Load (TMDL): The phosphorus mass limit is based on the Total Maximum Daily Load (TMDL) for the Lake St. Croix Basin to address phosphorus water quality impairments within the TMDL

area. The TMDL was approved by EPA on August 8, 2012Total 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 70 of the *Lake St. Croix Nutrient Total Maximum Daily Load Report (May2012)* and is expressed as a maximum annual load. For the River Falls Municipal Utility WWTF, this WLA is 2,628 kg/yr (5,794 lbs/yr) and 15.9 lbs/day.

The monthly average limit 20 lbs/day was determined in the previous limit evaluation. The monthly multiplier of 1.28 was chosen as described in the Department TMDL Implementation guidance using a coefficient of variation (CV) of 0.6 and a daily effluent monitoring frequency. The TMDL-based phosphorus WQBEL(s) will be re-evaluated if the annual phosphorus WLA is not being met as described in the prior stated guidance. This is done by comparing each rolling sum of 12 consecutive months of total monthly mass phosphorus discharges over the current permit term directly against the annual WLA.

In this case, the River Falls Municipal Utility WWTF has been 100% compliant in meeting the annual WLA of 5,794 lbs/yr. None of the rolling sums have exceeded the annual WLA during July 2020 – July 2025. The River Falls Municipal Utility WWTF is considered to be meeting their annual WLA. Therefore, the monthly average limit of 20 lbs/day will remain unchanged during the reissued permit term.

Mercury – The WQBEL for total recoverable mercury is set equal to the most stringent criterion of 1.3 ng/L, according to s. NR 106.06(6), Wis. Adm. Code, because the background concentration in the receiving water and similar inland streams is known to exceed 1.3 ng/L.

The 30-day P_{99} of representative data is 2.13 ng/L, which is greater than the most stringent limit (wildlife criterion of 1.3 ng/L); therefore, a limit of 1.3 ng/L as a monthly average is required for mercury.

The monthly average mass limitation of 9.0 mg/day is based on the concentration limit and the annual design flow rate of 1.824 MGD in accordance with s. NR 106.07(2)(a), Wis. Adm. Code. The alternate wet weather mass limitation of 10 mg/day is based on the concentration limit and the estimated monthly design flow rate of 1.98 MGD.

Sections NR 106.07(3) and NR 205.067(7), Wis. Adm. Code require WPDES permits contain weekly average and monthly average limitations for municipal dischargers whenever practicable and necessary to protect water quality. Therefore, a weekly average limit of 1.3 ng/L is required to meet expression of limits requirements in addition to the monthly average limits.

Ammonia- Current acute and chronic ammonia toxicity criteria for the protection of aquatic life are included in Tables 2C and 4B of ch. NR 105, Wis. Adm. Code. Subchapter IV of ch. NR 106 establishes the procedure for calculating water quality-based effluent limitations (WQBELs) for ammonia.

Mass limitations are recommended due to the Outstanding Resource Water (ORW) designation of the Kinnickinnic River in accordance with s. NR 106.32(5), Wis. Adm Code.

Final Ammonia Nitrogen Limits

	Daily Maximum mg/L	Weekly Average mg/L	Weekly Average lbs/day	Monthly Average mg/L**	Monthly Average lbs/day*
May - October		2.0	30	**2.0**	
November - April	35	7.5	113	5.7	86

*The applicable wet weather mass limit from November through April is 94 lbs/day as a monthly average.
**Values

Total Nitrogen Monitoring (NO2+NO3, TKN and Total N)- The Department has included effluent monitoring for Total Nitrogen through the authority under s. 283.55(1)(e), Wis. Stats., which allows the department to require the permittee to submit information necessary to identify the type and quantity of any pollutants discharged from the point source, and through s. NR 200.065(1)(h), Wis. Adm. Code., which allows for this monitoring to be collected during the permit term. More information on the justification to include total nitrogen monitoring in wastewater permits can be found in the "Guidance for Total Nitrogen Monitoring in Wastewater Permits" dated October 1, 2019. Annual monitoring in rotating quarters are required.

Disinfection/E. Coli--Revisions to bacteria surface water quality criteria to protect recreational uses and accompanying E. coli WPDES permit implementation procedures became effective May 1, 2020. The new rule requires that WPDES permits for facilities with required disinfection include monitoring for E. coli while facilities are disinfecting during the recreation period, and establish effluent limitations for E. coli established in s. NR 210.06 (2), Wis. Adm Code. The administrative code rule changes included the following actions: revised the bacteria water quality criteria from fecal coliform to E. coli to protect recreation in ch. NR 102, Wis. Adm. Code.; removed fecal coliform criteria for certain individual waters from ch. NR 104, Wis. Adm. Code.; revised permit requirements for publicly and privately owned sewage treatment works in ch. NR 210, Wis. Adm. Code.; and, updated approved analytical methods for bacteria in ch. NR 219, Wis. Adm. Code. Monitoring and limits for E. Coli are required seasonally May-September throughout the permit term.

PFOS and PFOA - NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. At the first reissuance of a WPDES permit after August 1, 2022, the new rule requires WPDES permits for major municipal dischargers with an average flow rate greater than 1 MGD but less than 5 MGD, at a minimum sample effluent once every two-months for PFOS and PFOA pursuant s. NR 106.98(2)(b), Wis. Adm. Code.

A sample frequency of 1/2 months means one sample is taken during any two-month period. Examples of 1/2 month sample would be every other month (Jan, March, May, etc.) or back-to-back months with a break in between (February & March, May & June, Aug & Sept, etc.). DMR Short Forms will be generated for the following time periods: January-February, March-April, May-June, July-August, September-October, and November-December. At a minimum one sample result will be present on each form.

The initial determination of the need for sampling shall be conducted for up to two years in order to determine if the permitted discharge has the reasonable potential to cause or contribute to an exceedance of the PFOS or PFOA standards under s. NR 102.04(8)(d)1, Wis. Adm. Code.

Whole Effluent Toxicity- Whole effluent toxicity (WET) testing requirements and limits (if applicable) are determined in accordance with ss. NR 106.08 and NR 106.09 Wis. Adm. Code, as revised August 2016. See the current version of the Whole Effluent Toxicity Program Guidance Document and checklist and WET information, guidance and test methods at http://dnr.wi.gov/topic/wastewater/wet.html. The facility is required to perform annual acute and chronic WET tests in different seasons as specified in the permit.

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)**
002	B	Liquid		Incorporation/injection	Hauled or Land Application	385 tons

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)**
004	A	Cake	Heat Drying	Incorporation	Land Application	Unknown
005	A	Cake	Heat Drying	Drying with Primary Solids	Land Application	Unknown
006	A	Cake	Heat Drying	Drying with Primary Solids	Land Application	Unknown
007	A/B	Cake	Heat Drying	Drying with Primary Solids	Land Application	Unknown
Does sludge management demonstrate compliance? yes						
Is additional sludge storage required? Yes, they have a silo if the class A treatment goes offline.						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? no						
Is a priority pollutant scan required? no						

4.1 Sample Point Number: 002- Hauled Sludge

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

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
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.

4.1.1 Changes from Previous Permit:

Sludge limitations and monitoring requirements were evaluated for this permit term and sample frequencies were increased to quarterly and new PFAS monitoring added.

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

4.1.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

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

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

4.2 Sample Point Number: 004- Class B Cake Sludge

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Quarterly	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Quarterly	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Quarterly	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Quarterly	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Quarterly	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Quarterly	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Quarterly	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Quarterly	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Quarterly	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Quarterly	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
Nitrogen, Total Kjeldahl		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Nitrogen, Ammonium (NH4-N) Total		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Phosphorus, Total		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Phosphorus, Water Extractable		% of Tot P	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Potassium, Total Recoverable		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.

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

4.2.1 Changes from Previous Permit:

No changes – new sample point.

4.2.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA 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. The use of the department's "Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS" is recommended.

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

4.3 Sample Point Number: 005- Class A Sludge After Trt

List 3 **PATHOGEN CONTROL FOR CLASS A SLUDGE** The following requirements shall be met prior to land application of sludge.		
Parameter	**Unit**	**Limit**
Fecal Coliform*	MPN/gTS	1000
OR		
Salmonella	MPN/4gTS	3
AND, ONE OF THE FOLLOWING PROCESS OPTIONS		

List 3 PATHOGEN CONTROL FOR CLASS A SLUDGE The following requirements shall be met prior to land application of sludge.		
Parameter	**Unit**	**Limit**
Fecal Coliform*	MPN/gTS	1000
Temp/Time based on % Solids	Alkaline Treatment	
Prior test for Enteric Virus/Viable Helminth Ova	Post test for Enteric Virus/Viable Helminth Ova	
Composting	Heat Drying	
Heat Treatment	Thermophilic Aerobic Digestion	
Beta Ray Irradiation	Gamma Ray Irradiation	
Pasteurization	PFRP Equivalent Process	
* The Fecal Coliform limit shall be reported as the geometric mean of 7 discrete samples on a dry weight basis.		

4.3.1 Changes from Previous Permit:

No changes – new sample point.

4.3.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

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

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

4.4 Sample Point Number 006 - Class A/B Cake from Storage

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Quarterly	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Arsenic Dry Wt	High Quality	41 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Quarterly	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Quarterly	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Quarterly	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Quarterly	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Quarterly	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Quarterly	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Quarterly	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Quarterly	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Quarterly	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
Nitrogen, Total Kjeldahl		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Nitrogen, Ammonium (NH_4-N) Total		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Phosphorus, Total		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Phosphorus, Water Extractable		% of Tot P	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Potassium, Total Recoverable		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
PFOA + PFOS		µg/kg	Annual	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

4.4.1 Changes from Previous Permit:

No changes – new sample point.

4.4.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

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

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

4.5 Sample Point Number 007- Class A Heat Dried Cake Sludge

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Quarterly	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Quarterly	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Quarterly	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Quarterly	Composite	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Lead Dry Wt	Ceiling	840 mg/kg	Quarterly	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Quarterly	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Quarterly	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Quarterly	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Quarterly	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Quarterly	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
Nitrogen, Total Kjeldahl		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Nitrogen, Ammonium (NH_4-N) Total		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Phosphorus, Total		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Phosphorus, Water Extractable		% of Tot P	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
Potassium, Total Recoverable		Percent	Quarterly	Composite	Sample only if sludge will be land applied, not landfilled.
PFOA + PFOS		µg/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.

4.5.1 Changes from Previous Permit:

No changes – new sample point.

4.5.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

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

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 Mercury Effluent Limits

Required Action	Due Date
Report on Effluent Discharges: Submit a report on effluent discharges of mercury. The report shall include an evaluation of collected effluent data and the facility's ability to comply with the final mercury effluent limits. The report shall conclude whether current treatment, operational improvements, or a pollutant minimization program will result in compliance with final mercury effluent limits.	12/31/2026
Action Plan: Submit an action plan for complying with the final mercury effluent limits.	06/30/2027
Initiate Actions: Initiate the actions identified in the plan.	12/31/2027
Progress Report: Submit a progress report detailing progress made toward meeting the final mercury effluent limits, including all available mercury sample results, a summary of actions taken, and any mercury pollutant minimization activities conducted during the previous year.	06/30/2028
Final Evaluation Report: Submit a final evaluation report, including all mercury sampling data and a conclusion on the likelihood that mercury effluent limits will still apply. The permittee shall submit a request to re-evaluate the need for mercury effluent limits. If the Department determines there is no reasonable potential to exceed the calculated mercury limits, permit modification would be required to remove the mercury effluent limits and remaining schedule actions.	12/31/2028
Progress Report: Submit a status report on the action items from the Final Evaluation Report conclusion.	12/31/2029
Complete Actions: Complete actions necessary to achieve compliance with the final mercury effluent limits.	12/31/2030

5.1.1 Explanation of Schedule

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

5.2 PFOS/PFOA Minimization Plan Determination of Need

Required Action	Due Date
Report on Effluent Discharge: Submit a report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations. This analysis should also include a comparison to the applicable narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results.	12/31/2027
Report on Effluent Discharge and Evaluation of Need: Submit a final report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations of data collected over the last 24 months. The report shall also provide a comparison on the likelihood of the facility needing to develop a PFOS/PFOA minimization plan. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results. The permittee shall also submit a request to the department to evaluate the need for a PFOS/PFOA minimization plan. If the Department determines a PFOS/PFOA minimization plan is needed based on a reasonable potential evaluation, the permittee will be required to develop a minimization plan for Department approval no later than 90 days after written notification was sent from the Department. The Department will modify or revoke and reissue the permit to include PFOS/PFOA minimization plan reporting requirements along with a schedule of compliance to meet WQBELs. Effluent monitoring of PFOS and PFOA shall continue as specified in the permit until the modified permit is issued. If, however, the Department determines there is no reasonable potential for the facility to discharge PFOS or PFOA above the narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code, no further action is required and effluent monitoring of PFOS and PFOA shall continue as specified in the permit.	12/31/2028

5.2.1 Explanation of Schedule

PFOS/PFOA Minimization Plan Determination of Need- As stated above, ch. NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Section NR 106.98, Wis. Adm. Code, specifies steps to generate data in order to determine the need for reducing PFOS and PFOA in the discharge. Data generated per the effluent monitoring requirements will be used to determine the need for developing a PFOS/PFOA minimization plan. As part of the schedule, the permittee is required to submit two annual Reports on Effluent Discharge.

If the Department determines that a minimization plan is needed, the permit will be modified or revoked/reissued to include additional requirements.

5.3 Land Application Management Plan

A management plan is required for the land application system.

Required Action	Due Date
Land Application Management Plan Submittal: Submit a sludge management plan (SMP) to optimize the sludge management performance and demonstrate compliance with Ch. NR 204, Wis. Adm. Code, by the Due Date. This management plan shall include sufficient detail of the sludge management program for the facility. The plan shall include separate sections for each type of sewage sludge included in this permit. The SMP shall provide standardized information for communication to operators and the department including but not limited to the following: 1) Specify information on the sludge treatment processes for each sampling point and outfall; 2) Show and describe sample point and outfall monitoring locations on a schematic and provide photos of the specific sampling points; 3) Show, describe and tabulate the monitoring requirements at each sampling point and outfall locations; 4) Show, describe and explain sampling protocols for each location listing parameters to be monitored including: a)Pollutants, b)Nutrients c)Pathogen treatment process requirements including treatment temperature, moisture content (total solids) and pathogen densities (fecal concentrations) d)Vector Reduction appropriate for the pathogen treatment process such as but not limited to temperatures, volatile solids reduction, moisture content, etc. as required by the WPDES permit and Ch. NR 204, Wis. Adm. Code; 5) Monitoring frequencies at each sample point and outfall; 6) Analytical methods with appropriate hold times and chain-of -custody procedures; 7) Documentation relating to temperature monitoring data recording, retrieval and printing out the data when requested; 8) Storage, verification monitoring, loading, transportation and discharge details associated with all outfalls; 9) Collection, storage, disposal information for sludge detailing pickups including loading and similar details; 10) Collection, storage and disposal processes of sludge when the sludge does not meet minimum requires to meet Class A and EQ requirements. [Note: EQ and Class A are similar. Facility should explain the difference and how they will handle the material if the material meets Class A but fails to meet EQ.] 11) Identify land application sites;	03/31/2026

12) Describe site limitations; 13) Address vegetative cover management and removal including loading to crop needs, crop harvesting; 14) Specific the availability of storage for sludge; 15) Describe the type of transportation and spreading vehicles; 16) Track site loadings to facility's land application sites; 17) Address contingency plans for adverse weather and odor/nuisance abatement; 18) Address construction contingencies when treatment equipment is out of service; and 19) Include any other pertinent information. Once approved, all sludge management activities shall be conducted in accordance with the plan. Any changes to the plan must be approved by the department prior to implementing the changes. Note: The SMP is a living document and should be designed and constructed to allow for future updates. Consider providing an overview to explain the facilities solids flow processes, then using sections and appendices to provide more details. The use of appendices to explain start up, operation and shutdown of the sludge treatment units is encouraged to show that all sludge particles meet Class A requirements.	

Explanation of Schedule

Land Application Management Plan - 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.

Other Comments

TBD

Attachments

Water Quality Based Effluent Limits- memo dated September 11, 2025 and titled **"**Water Quality-Based Effluent Limitations for the River Falls Municipal Utility WWTF WPDES Permit No. WI-0029394."

Public Notice- Star Observer, 2760 N Service Dr., PO Box 15, Red Wing, WI, 55066-0015

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Angela Parkhurst Wastewater Specialist Date: November 10, 2025