Public Noticed Rozellville Draft Permit Fact Sheet

General Information

Permit Number	WI-0029076-11-0
Permittee Name and Address	Rozellville Sanitary District No 1 D 1825 CTH C, Stratford, WI 54484
Permitted Facility Name and Address	Rozellville Sanitary District No 1 D 1825 CTH C, Stratford, WI
Permit Term	April 01, 2026 to March 31, 2031
Discharge Location	Approximately 0.5 miles west & 0.5 miles south of intersection of County Highway C and County Highway M. 44° 44' 16"N, 90° 02' 10"W
Receiving Water	unnamed trib to Wild Creek in Little Eau Pleine River Watershed of Central Wisconsin River Basin in Marathon County
Stream Flow ($Q_{7,10}$)	0 cfs
Stream Classification	Limited Aquatic Life, Non-public Water Supply
Discharge Type	Existing, Intermittent discharge, approximately 2 weeks in spring and 2 weeks in fall
Annual Average Design Flow (MGD)	0.021 MGD
Industrial or Commercial Contributors	None
Plant Classification	A4 - Ponds, Lagoons and Natural Systems; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

The Rozellville Sanitary District #1 Wastewater Treatment Facility treats domestic waste from Rozellville. The facility has an annual average design flow of 0.021 million gallons per day (MGD) and treated an actual annual average of 0.013 MGD in 2024 on a fill and draw basis. The facility consists of a synthetically lined first lagoon, clay lined second lagoon, and the third cell is an old seepage cell that has been considered a stabilization lagoon in the last few permit terms that discharges to a vegetated stormwater swale for approximately half a mile that outlets to an unnamed tributary to Wild Creek. Based on a leakage study performed in 2024 it was found that ponds 2 and 3 have substantial leakage and therefore a schedule to address this issue has been proposed in the permit to protect the groundwater and surface water. Other monitoring changes proposed for this issuance include 1) addition of effluent chloride monitoring to meet the data requirements of s. NR 106.85, Wis. Adm. Code., 2) lower effluent phosphorus interim limits associated with an approved multi-discharger variance for phosphorus (MDV) and compliance schedules to comply with s. 283.16, Wis. Stats. requirements for phosphorus, 3) potential new E. coli effluent limits established in s. NR 210.06 (2), Wis. Adm Code. and an associated compliance schedule, 4) increased sample frequencies for influent and effluent parameters, 5) additional sludge sampling parameters associated with proposed sludge removal, and 6) PFAS sludge sampling has been included in the WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code to quantitate risk.

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Substantial Compliance Determination

Enforcement During Last Permit: A Notice of Noncompliance was issued for missing compliance schedule reports on February 08, 2024. 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, compliance schedule items, and a site visit on 08/21/2025, the Rozellville Sanitary District No 1. has been found to be in substantial compliance with their current permit.

Compliance determination made by Nick Lindstrom on 8/21/2025.

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	0.013 MGD (2024)	Representative influent samples shall be collected at the pumping station.
001	N/A	Representative samples shall be collected from the manhole between pond #1 and pond #2.
004	Sludge not removed	Representative grab samples of sludge during sludge removal from pond #1 and monitor for List 1, 2, 3, and 4 parameters and PCBs and PFAS.
005	0.016 MGD	Representative effluent samples shall be collected from the effluent control manhole.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- INFLUENT TO PLANT

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	2/Week	Grab	
Suspended Solids, Total		mg/L	2/Week	Grab	
Nitrogen, Total Kjeldahl		mg/L	Annual	Grab	
Nitrogen, Organic Total		mg/L	Annual	Calculated	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nitrogen, Ammonia (NH3-N) Total		mg/L	Annual	Grab	

1.1.1 Changes from Previous Permit:

Influent limitations and monitoring requirements were evaluated for this permit term and sampling frequencies for BOD and TSS were increased to 3/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.

Influent monitoring is also needed to assess loading to the facility and treatment performance. The required parameters and sampling frequency are appropriate for a land treatment system as outlined in ch NR 206, Wis. Adm. Code. The sampling frequencies for BOD and TSS were increased to correspond to the effluent BOD and TSS sample frequencies.

2 Surface Water - Monitoring and Limitations

2.1 Sample Point Number: 005- POND #3 to UNNAMED TRIB

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	
BOD5, Total	Monthly Avg	20 mg/L	3/Week	Grab	
BOD5, Total	Weekly Avg	30 mg/L	3/Week	Grab	
Suspended Solids, Total	Monthly Avg	20 mg/L	3/Week	Grab	
Suspended Solids, Total	Weekly Avg	30 mg/L	3/Week	Grab	
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Dissolved Oxygen	Daily Min	4.0 mg/L	Daily	Grab	
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	11 mg/L	3/Week	Grab	Limit effective April and May
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	4.2 mg/L	3/Week	Grab	Limit effective April and May

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	9.5 mg/L	3/Week	Grab	Limit effective June-September
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	4.4 mg/L	3/Week	Grab	Limit effective June-September
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	14 mg/L	3/Week	Grab	Limit effective October - March
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	6.3 mg/L	3/Week	Grab	Limit effective October - March
Nitrogen, Ammonia (NH3-N) Total	Daily Max - Variable	mg/L	3/Week	Grab	Report the daily maximum Ammonia result in the Nitrogen, Ammonia (NH3-N) Total column of the eDMR. See Ammonia Limitation Section.
Nitrogen, Ammonia Variable Limit		mg/L	3/Week	Grab	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.
E. coli		#/100 ml	Weekly	Grab	Monitoring only May - September annually until the final limit goes into effect per the Effluent Limitations for E. coli Schedule.
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Limit Effective May - September annually per the Effluent Limitations for E. coli Schedule.
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit Effective May – September annually per the Effluent Limitations for E. coli Schedule. See the E. coli Percent Limit section below. Enter the result in the DMR on the last day of the month.
Chloride		mg/L	Weekly	Grab	Monitoring during May-Oct in 2028 and 2029.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Phosphorus, Total	Monthly Avg	1.0 mg/L	3/Week	Grab	This is an interim MDV limit effective through March 31, 2028. See the MDV/Phosphorus permit sections and phosphorus schedules.
Phosphorus, Total	Monthly Avg	0.6 mg/L	3/Week	Grab	This is an interim MDV limit effective on April 1, 2028. See the MDV/Phosphorus permit sections and phosphorus schedules.
Phosphorus, Total		lbs/month	Monthly	Calculated	Report the total monthly phosphorus discharged in lbs/month on the last day of the month on the DMR. See Standard Requirements for 'Appropriate Formulas' to calculate the Total Monthly Discharge in lbs/month.
Phosphorus, Total		lbs/yr	Annual	Calculated	Report the sum of the total monthly discharges (for the months that the MDV is in effect) for the calendar year on the Annual report form.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	Grab	Annual in specific quarters. See Nitrogen Series Monitoring section.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	Grab	Annual in specific quarters. See Nitrogen Series Monitoring section.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Annual in specific quarters. See Nitrogen Series Monitoring section. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.

2.1.1 Changes from Previous Permit

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

2.1.2 Explanation of Limits and Monitoring Requirements

Detailed discussions of limits and monitoring requirements can be found in the attached water quality-based effluent limits (WQBEL) memo dated December 16, 2025, from Benjamin Hartenbower to Angela Parkhurst and titled "Water Quality Based Effluent Limitations for the Rozellville Sanitary District No 1 WPDES Permit No. WI-0029076.

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, and it was determined that TSS, BOD, pH, dissolved oxygen, ammonia nitrogen, and total phosphorus sample frequencies were increased to their respective standard frequencies.

Discharge Season: The facility discharges on a fill-and-draw basis April through November. All samples shall be taken during normal operating conditions; therefore, monitoring is required only during periods of discharge pursuant to s. 283.55, Wis Stat.

BOD, TSS, pH and Dissolved Oxygen: Limits for BOD, TSS, pH and dissolved oxygen correspond to the requirements in the current permit since the facility has not increased the capacity of the wastewater treatment system since the last permit issuance, nor are increases expected during the term of the proposed permit.

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.

Daily maximum ammonia limits that vary with effluent pH apply year-round. See table below for more information. Samples for ammonia shall be collected at the same time as the pH samples.

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 ≤ pH ≤ 6.1	83	7.0 < pH ≤ 7.1	51	8.0 < pH ≤ 8.1	11
6.1 < pH ≤ 6.2	82	7.1 < pH ≤ 7.2	46	8.1 < pH ≤ 8.2	8.8
6.2 < pH ≤ 6.3	80	7.2 < pH ≤ 7.3	40	8.2 < pH ≤ 8.3	7.3
6.3 < pH ≤ 6.4	78	7.3 < pH ≤ 7.4	35	8.3 < pH ≤ 8.4	6.0
6.4 < pH ≤ 6.5	75	7.4 < pH ≤ 7.5	31	8.4 < pH ≤ 8.5	4.9
6.5 < pH ≤ 6.6	72	7.5 < pH ≤ 7.6	26	8.5 < pH ≤ 8.6	4.1
6.6 < pH ≤ 6.7	69	7.6 < pH ≤ 7.7	22	8.6 < pH ≤ 8.7	3.4
6.7 < pH ≤ 6.8	65	7.7 < pH ≤ 7.8	19	8.7 < pH ≤ 8.8	2.8
6.8 < pH ≤ 6.9	60	7.8 < pH ≤ 7.9	16	8.8 < pH ≤ 8.9	2.4
6.9 < pH ≤ 7.0	56	7.9 < pH ≤ 8.0	13	8.9 < pH ≤ 9.0	2.0

Disinfection/E. Coli:-Revisions to bacteria surface water quality criteria to protect recreational uses and accompanying E. coli WPDES permit implementation procedures became effective May 1, 2020. The new rule requires that WPDES permits for facilities with required disinfection include monitoring for E. coli while facilities are disinfecting during the recreation period, and establish effluent limitations for E. coli established in s. NR 210.06 (2), Wis. Adm Code. The administrative code rule changes included the following actions: revised the bacteria water quality criteria from fecal coliform to E. coli to protect recreation in ch. NR 102, Wis. Adm. Code.; removed fecal coliform criteria for certain

individual waters from ch. NR 104, Wis. Adm. Code.; revised permit requirements for publicly and privately owned sewage treatment works in ch. NR 210, Wis. Adm. Code.; and, updated approved analytical methods for bacteria in ch. NR 219, Wis. Adm. Code.

The Rozellville Sanitary District No 1 had previously been exempted from disinfection based on the limited aquatic life or limited forage fish community classification of the receiving water. Section NR 210.06(3)(g), Wis. Adm. Code, states that disinfection decisions may be made based on the hydrologic classifications listed in s. NR 104.02(1), Wis. Adm. Code (not on the water quality classifications - i.e., limited forage fish, limited aquatic life - that are defined in s. NR 104.02(3), Wis. Adm. Code). The hydrologic classification for unnamed tributary, upstream of Wild Creek is listed in ch. NR 104, Wis. Adm. Code, as a diffused surface water.

Discharges to diffuse surface waters that have very little to no flow most often result in effluent-dominated situations. As noted above, the risk of illness is related to the concentration and therefore dilution is an important consideration when considering risk to human health. Since little to no dilution is present in these situations, disinfection should not be exempted based solely on this hydrological classification.

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

Chloride: Only four chloride samples were available from Outfall 005, so monitoring data from Outfall 001 were considered. From March 2021 to September 2025, the 1-day P99 chloride concentration is 339 mg/L, and the 4-day P99 of effluent data is 260 mg/L.

These effluent concentrations are below the calculated WQBELs for chloride, therefore no effluent limits are needed. Weekly chloride monitoring at Outfall 005 is given during periods of discharge in 2028 and 2029 to ensure that 11 sample results are available at the next permit issuance to meet the data requirements of s. NR 106.85, Wis. Adm. Code.

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 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.

Wisconsin River Total Maximum Daily Load (TMDL): Rozellville Sanitary District No 1 is located within the Wisconsin River Basin Total Maximum Daily Load (TMDL), which was approved by EPA April 26, 2019. The TMDL establishes Waste Load Allocations (WLAs) for point source dischargers and determines the maximum amounts of phosphorus that can be discharged and still protect water quality.

Total phosphorus effluent limits in lbs/day are calculated as recommended in the TMDL Development and Implementation Guidance: Integrating the WPDES and Impaired Waters Programs (April 2020) and are based on the annual phosphorus wasteload allocation (WLA) given in lbs/yr. This WLA is found in Appendix K of the Wisconsin River TMDL Report (April 2019) and is expressed as a maximum annual load (lbs/yr). For the Rozellville Sanitary District No 1, this WLA is 8.0 lbs/yr as a final limit.

Phosphorus MDV:-The Rozellville Sanitary District No 1 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 TMDL Limit of 8.0 lbs/yr.

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 the TMDL derived limit of 8.0 lbs/yr.

Phosphorus rules became effective December 1, 2010 per NR 217, Wis. Adm. Code, that required the permittee to comply with water quality based effluent limits (WQBELs) for total phosphorous. The final phosphorus WQBEL is 8.0 lbs/yr and were to become effective as scheduled unless a variance was granted. For this permit term, the permittee has applied for the Multi-Discharger Variance (MDV) for phosphorus as provided for in s. 283.16, Wis. Stats., and approved by USEPA on September 3, 2025 for a 10-year duration. The permittee qualifies for the MDV because it is an existing source and a major facility upgrade is needed to comply with the applicable phosphorus WQBELs, thereby creating a financial burden. The interim effluent limit for total phosphorus is continues with a 1.0 mg/L monthly average limit which is currently achievable, followed by a highest attainable condition limit of 0.6 mg/L as a monthly average set to begin according to the associated compliance schedule.

Conditions of the MDV require the permittee to optimize phosphorus removal throughout the proposed permit term, comply with interim limits and make annual payments to participating county(s) by March 1 of each year based on the pounds of phosphorus discharged during the previous year in excess of the specified target value.

The "price per pound" value is $50.00 adjusted for CPI annually as defined by s. 283.16(8)(a)2, Wis. Stats and takes effect for reissued permits with effective dates starting April 1. This may differ from the "price per pound" that is public noticed; however, the "price per pound" is set upon reissuance and is applicable for the entire permit term. The participating county(s) uses these payments to implement nonpoint source phosphorus control strategies at the watershed level.

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

3 Land Treatment – Monitoring and Limitations

3.1 Sample Point Number: 001- DISCHARGE FR POND 1 TO POND 2

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
BOD5, Total		mg/L	Monthly	Grab	
Nitrogen, Total Kjeldahl		mg/L	Monthly	Grab	
Nitrogen, Organic Total		mg/L	Monthly	Calculated	
Nitrogen, Ammonia (NH3-N) Total		mg/L	Monthly	Grab	
Nitrogen, Nitrite + Nitrate Total		mg/L	Monthly	Grab	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nitrogen, Total		mg/L	Monthly	Calculated	
Chloride		mg/L	Monthly	Grab	

3.1.1 Changes from Previous Permit:

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

3.1.2 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 Wis. Adm. Code.

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)**
004	B	Liquid	Unknown	Unknown	Unknown	Unknown
Does sludge management demonstrate compliance? Yes. Proposed sludge removal this permit term.						
Is additional sludge storage required? No, pond system.						
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: 004- 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	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
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	
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	
Nitrogen, Ammonia (NH3-N) Total		Percent	Per Application	Composite	
Phosphorus, Total		Percent	Per Application	Composite	
Phosphorus, Water Extractable		% of Tot P	Per Application	Composite	
Potassium, Total Recoverable		Percent	Per Application	Composite	
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	See PCB Section for more information.
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	See PCB Section for more information.
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

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					Permit Sections for more information.

4.1.1 Changes from Previous Permit:

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

Lists 2-4 Parameters- monitoring is required when sludge is removed.

PFAS –Monitoring is required **once** 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. 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 Effluent Limitations for E. coli

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

Required Action	Due Date
Status Update: The permittee shall submit information within the discharge monitoring report (DMR) comment section documenting the steps taken in preparation for properly monitoring and testing for E. coli including, but not limited to, selected test method and location of sampling.	05/21/2026
Operational Evaluation Report: The permittee shall prepare and submit an Operational Evaluation Report to the Department for review and approval. The report shall include an evaluation of collected effluent data and proposed operational improvements that will optimize efficacy of disinfection at the treatment plant during the period prior to complying with final E. coli limitations and, to the extent possible, enable compliance with the final E. coli limitations. The report shall include a plan and schedule for implementation of the operational improvements. These improvements shall occur as	11/30/2026

soon as possible, but not later than 04/30/2027. The report shall state whether the operational improvements are expected to result in compliance with the final E. coli limitations. The permittee shall implement the operational improvements in accordance with the approved plan and schedule specified in the Operational Evaluation Report and in no case later than 04/30/2027. If the Operational Evaluation Report concludes that the operational improvements are expected to result in compliance with the final E. coli limitations, the permittee shall comply with the final E. coli limitations by 04/30/2027 and the permittee is not required to comply with subsequent milestones identified below in this compliance schedule (‘Submit Facility Plan’, 'Final Plans and Specifications', 'Treatment Plant Upgrade to Meet Limitations', ‘Construction Upgrade Progress Report’, 'Complete Construction', 'Achieve Compliance'). FACILITY PLAN - If the Operational Evaluation Report concludes that operational improvements alone are not expected to result in compliance with the final E. coli limitations, the permittee shall initiate development of a facility plan for meeting final E. coli limitations and comply with the remaining required actions in this schedule of compliance. If the Department disagrees with the conclusion of the report and determines that the permittee can achieve final E. coli limitations using the existing treatment system with only operational improvements, the Department may reopen and modify the permit to include an implementation schedule for achieving the final E. coli limitations sooner than 04/30/2030.	
Submit Facility Plan: If the Operational Evaluation Report concluded that the permittee cannot achieve final E. coli limitations with operational improvements alone, the permittee shall submit a Facility Plan per s. NR 110.09, Wis. Adm. Code. The permittee may submit an abbreviated facility plan if the Department determines that the modifications are minor.	04/30/2027
Final Plans and Specifications: The permittee shall submit final construction plans to the Department for approval pursuant to ch. NR 108, Wis. Adm. Code, specifying treatment plant upgrades that must be constructed to achieve compliance with final E. coli limitations and a schedule for completing construction of the upgrades by the complete construction date specified below.	03/31/2028
Treatment Plant Upgrade to Meet Limitations: The permittee shall initiate bidding, procurement, and/or construction of the project. The permittee shall obtain approval of the final construction plans and schedule from the Department pursuant to s. 281.41. Stats., prior to initiating activities defined as construction under ch. NR 108, Wis. Adm. Code. Upon approval of the final construction plans and schedule by the Department pursuant to s. 281.41, Stats., the permittee shall construct the treatment plant upgrades in accordance with the approved plans and specifications.	09/30/2028
Construction Upgrade Progress Report: The permittee shall submit a progress report on construction upgrades.	09/30/2029
Complete Construction: The permittee shall complete construction of wastewater treatment system upgrades.	03/31/2030
Achieve Compliance: The permittee shall achieve compliance with final E. coli limitations.	04/30/2030

5.1.1 Explanation of Schedule

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

5.2 Phosphorus Schedule - Optimization and Compliance Planning

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

Required Action	Due Date
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 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.	03/31/2027
Progress Report #2: Submit a progress report per the above for the prior calendar year.	03/31/2028
Progress Report #3: Submit a progress report per the above for the prior calendar year.	03/31/2029
Progress Report #4: Submit a progress report per the above for the prior calendar year.	03/31/2030
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.	03/31/2031

5.2.1 Explanation of Schedule

Optimization and Compliance Planning- Per s. 283.16(6)(a), Wis. Stats. the Department may include a requirement that the permittee optimize the performance of a point source in controlling phosphorus discharges, which may be necessary to achieve compliance with applicable effluent limits. This compliance schedule requires the permittee to prepare an optimization plan with a schedule for implementation and submit it for Department approval. The schedule also includes a compliance planning element focused on economically feasible solutions to low-level phosphorus effluent limits such as water quality trading or adaptive management. The permittee shall take the steps called for in the optimization plan and submit annual progress reports on optimizing the removal of phosphorus and establishing a water quality trade or adaptive management project. Should the permittee intend to reapply for a subsequent term of variance coverage, a financial

alternatives analysis will need to be completed. Report elements are listed in the schedule, and more information can be found in EPA's March 2024 Financial Capabilities Assessment Guidance, Appendix C.

5.3 Phosphorus Payment per Pound to County

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

Required Action	Due Date
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 8.0 lbs/yr 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.	

5.3.1 Explanation of Schedule

County Payment - Subsection 283.16(6)(b), Wis. Stats., requires permittees that have received approval for the multi-discharger variance (MDV) to implement a watershed project that is designed to reduce nonpoint sources of phosphorus within the HUC 8 watershed in which the permittee is located. The permittee has selected the "Payment to Counties" watershed option described in s. 283.16(8), Wis. Stats. Under this option the permittee shall make annual payment(s) to participating county(s) that are calculated based on the amount of phosphorus actually discharged during a calendar year in pounds per year less the amount of phosphorus that would have been discharged had the permittee discharged phosphorus at a target value 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).

5.4 Phosphorus Multi-Discharger Variance Interim Limit (0.6 mg/L)

This compliance schedule requires the permittee to achieve compliance with the specified MDV interim effluent limit in accordance with s. 283.16(6), Wis. Stats., by the due date.

Required Action	Due Date
Report on Effluent Discharges: Submit a report on effluent discharges of phosphorus with conclusions regarding compliance.	03/31/2027
Action Plan: Submit an action plan for complying with the specified interim effluent limit. If construction is required, include plans and specifications with the submittal.	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

5.4.1 Explanation of Schedule

Interim Limit- Subsection 283.16(6), Wis. Stats., establishes required interim phosphorus effluent limits that must be met for multi-discharger variance (MDV) eligibility. The schedule above provides the permittee with two years to comply with that limit.

5.5 Lagoon Facility Modification

Required Action	Due Date
Facility Plan: The permittee shall submit a Comprehensive Facility Plan to the Department for approval in compliance with Ch. NR 110, Wis. Adm. Code. The Comprehensive Facility Plan shall evaluate the permittee's ability to comply with the separation distances of the existing lagoons to bedrock and groundwater, in accordance with s. NR 110.24(3), Wis. Adm. Code. Facility plans which recommend the abandonment of a wastewater treatment, sludge, or septage storage lagoon or land disposal system shall include an abandonment plan outlining the proposed method of abandonment of the facility as part of the Comprehensive Facility Plan, pursuant to s. NR 110.09(2)(r), Wis. Adm. Code, and shall outline timeframes, procedures proposed for abandonment of the lagoons including the removal of the sludge, proposed methods of disposal, chemical analysis, and quantity estimations. Lagoon modifications recommended by the Comprehensive Facility Plan may require the submittal of a Desludging Management Plan. If land application is the proposed method of disposal, a Land Spreading Management Plan shall accompany either the Desludging Management Plan or Abandonment Plan, as directed in the Land Spreading Management Plan and Desludging Management Plan schedules below.	09/30/2026
Facility Plans and Specs: The permittee shall submit final construction plans and specifications to the Department for review in accordance with s. 281.41, Wis. Stats., for approval pursuant to Ch. NR 108 and 110, Wis. Adm. Code, specifying treatment plant upgrades that must be constructed to achieve	06/30/2027

compliance with the separation distances of the existing lagoons to bedrock and groundwater and a schedule for completing construction of the upgrades.	
Treatment Plant Upgrade: The permittee shall initiate construction of the upgrades. The permittee shall obtain approval of the final construction plans and schedule from the Department pursuant to s. 281.41, Wis. Stats. Upon approval of the final construction plans and schedule by the Department pursuant to s. 281.41, Wis. Stats., the permittee shall construct the treatment plant upgrades in accordance with the approved plans and specifications.	12/31/2027
Construction Upgrade Progress Report #1: The permittee shall submit a progress report on construction upgrades.	06/30/2028
Construction Upgrade Progress Report #2: The permittee shall submit a progress report on construction upgrades.	12/31/2028
Complete Construction: The permittee shall complete construction of the wastewater treatment system upgrades.	12/31/2029

5.5.1 Explanation of Schedule

Sludge Management Plan- If the lagoons are to be de-sludged 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.

Other Comments

TBD

Attachments

Water Quality Based Effluent Limits- memo dated December 16, 2025, from Benjamin Hartenbower to Angela Parkhurst and titled "Water Quality Based Effluent Limitations for the Rozellville Sanitary District No 1 WPDES Permit No. WI-0029076

Public Notice - The Stratford Journal, PO Box 677, Abbotsford, WI 54405-0677

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Angela Parkhurst Wastewater Specialist Date: February 4 , 2026