Permit Fact Sheet

General Information

Permit Number	WI-0000345-11-0
Permittee Name and Address	Seneca Foods Corporation Gillett 200 N Green Bay Ave, PO Box 258 Gillett WI 54124
Permitted Facility Name and Address	Seneca Foods Corporation Gillett 200 N Green Bay Ave, Gillett
Permit Term	June 01, 2025 to May 30, 2030
Discharge Location	North bank of Christie Brook, between Washington Street and Green Bay Avenue
Receiving Water	Christie Brook and the groundwater of the Lower Oconto River Watershed (GB03), Upper Green Bay Basin, in Oconto County
Stream Flow ($Q_{7,10}$)	0.17 cfs
Stream Classification	Warm water sport fish community, non-public water supply
Discharge Type	Existing, seasonal (June – October)

Facility Description

This facility processes and cans approximately 42,000 tons of green beans each season. The canning season can begin as early as June and continue as late as October, each year. This activity results in production of approximately 5 million cases of green beans per season. Processing occurs 6 or 7 days per week and generates wastewater 24 hours per day during production. The facility's water supply is from the City of Gillett municipal water system which uses phosphorus-based water treatment additives. Process wastewater is generated by washing, blanching and clean-up operations as well as the cooling of cans after heat processing. The process wastewater is either discharged to a 30-acre spray irrigation field or landspread on approximately 400 acres of DNR approved sites with a high-pressure spray gun mounted on a truck.

Contact can cooling water is discharged to Christie Brook and averages 0.2 million gallons per day during production. The water is cooled through a series of cooling towers and mechanical chillers. The water discharges from the towers into a tank with a dehalogenation additive. Finally, the can cooling water is discharged from the tank through a pipe protruding from the bank approximately 6 feet above the stream bed. The can cooling water results from cooling canned product with city water which contains phosphorus-based additives. A biocide additive is also added to the cooling water line which is then dehalogenated with another additive prior to discharge to surface water. Non-phosphorus based anti-corrosion and anti-deposition additives are also added to the cooling water. Waste green bean by-product solids are picked up by farmers to use as animal feed or landspread on DNR approved sites.

Sanitary wastewater, boiler blowdown and water softener regeneration water are discharge to the City of Gillett Wastewater Treatment Facility. At the end of each season, the pumping station for the spray irrigation field is cleaned out and residuals are landspread on the spray field. Five monitoring wells continue to monitor groundwater quality.

Substantial Compliance Determination

After a desk top review of all discharge monitoring reports, land application reports, compliance schedule items, and a site visit on September 17, 2024, this facility has been found to be in substantial compliance with their current permit.

Compliance determination entered by David Hass on October 17, 2024.

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)**
001	0.13 MGD (2023)	Effluent: Can contact cooling water containing additives. 24-hour flow proportional sampler located in the final pit prior to the discharge pipe downstream of the cooling towers. Flow meter located immediately after the cooling towers.
002		Representative samples of process (wash & blanch) and can line clean-up wastewater shall be obtained prior to discharge to the 30 acre spray irrigation field located in the E1/2, NE1/4, Sec 22, T28N-R18E, Tn of Gillett, Oconto Co. The same analytical results can be used to characterize both this outfall and outfall 003 to land application.
003		Representative samples of process (wash & blanch) and can line clean-up wastewater shall be obtained prior to discharge to approved landspreading sites. The same analytical results can be used to characterize both this outfall and outfall 002 to spray irrigation.
004		Representative samples of green bean processing by-product solids shall be obtained prior to hauling off site for landspreading on approved sites.

Permit Requirements

Sample Point Designation For Groundwater Monitoring Systems			
System	**Sample Pt Number**	**Well Name**	**Comments**
Spray Irrigation Field	802	MW-2	Down-gradient
Spray Irrigation Field	803	MW-3	Down-gradient
Spray Irrigation Field	804	MW-4	Down-gradient
Spray Irrigation Field	806	MW-6	Background Well; Upgradient
Spray Irrigation Field	807	MW-7	Down-gradient

1 Surface Water - Monitoring and Limitations

1.1 Sample Point Number: 001- CAN CONTACT COOLING WATER

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	
BOD5, Total	Daily Max	20 mg/L	Weekly	24-Hr Flow Prop Comp	
BOD5, Total	Monthly Avg	10 mg/L	Weekly	24-Hr Flow Prop Comp	
BOD5, Total	Daily Max	520 lbs/day	Weekly	24-Hr Flow Prop Comp	
BOD_5, Total	Daily Avg	300 lbs/day	Weekly	24-Hr Flow Prop Comp	
BOD_5, Total	Annual Avg	200 lbs/day	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total	Daily Max	920 lbs/day	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total	Daily Avg	620 lbs/day	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total	Annual Avg	360 lbs/day	Weekly	24-Hr Flow Prop Comp	
pH Field	Daily Max	9.0 su	Weekly	Grab	
pH Field	Daily Min	6.0 su	Weekly	Grab	
Halogen, Total Residual as Cl2	Daily Max	24 ug/L	Weekly	Grab	
Halogen, Total Residual as Cl2	Weekly Avg	8.1 ug/L	Weekly	Grab	
Phosphorus, Total	Monthly Avg	0.68 mg/L	Weekly	24-Hr Flow Prop Comp	Limit effective throughout the permit term, as it represents a minimum control level.
Phosphorus, Total		lbs/day	Weekly	Calculated	Report daily mass discharged using Equation 1a. in the Water Quality Trading (WQT) section.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
WQT Credits Used (TP)		lbs/month	Monthly	Calculated	Report WQT TP Credits used per month using Equation 2b in the Water Quality Trading (WQT) section. Available TP Credits are specified in Table 2 and in the approved Water Quality Trading Plan.
WQT Computed Compliance (TP)	Monthly Avg	0.4 mg/L	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 3 in the Water Quality Trading (WQT) section. Value entered on the last day of the month.
WQT Computed Compliance (TP)	6-Month Avg	0.13 mg/L	Monthly	Calculated	Compliance with the six-month average limit is evaluated at the end of the six-month period on June 30 and December 31.
WQT Credits Used (TP)	Annual Total	65 lbs/yr	Annual	Calculated	The sum of total monthly credits used may not exceed Table 2 values listed.
Arsenic, Total Recoverable		mg/L	Weekly	24-Hr Flow Prop Comp	Monitoring only in 2028.
Copper, Total Recoverable		mg/L	Weekly	24-Hr Flow Prop Comp	Monitoring only in 2028.
Zinc, Total Recoverable		mg/L	Weekly	24-Hr Flow Prop Comp	Monitoring only in 2028.
Temperature Maximum	Daily Max	87 deg F	3/Week	Grab	Limit effective in July.
Temperature Maximum	Daily Max	86 deg F	3/Week	Grab	Limit effective in August.
Temperature Maximum	Daily Max	84 deg F	3/Week	Grab	Limit effective in September.
Temperature Maximum	Weekly Avg	78 deg F	3/Week	Grab	Limit effective in June.
Temperature Maximum	Weekly Avg	83 deg F	3/Week	Grab	Limit effective in July & August.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Temperature Maximum	Weekly Avg	75 deg F	3/Week	Grab	Limit effective in September.
Temperature Maximum	Weekly Avg	63 deg F	3/Week	Grab	Limit effective in October.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET Section.
Chronic WET	Monthly Avg	1.1 TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET Section.

1.1.1 Changes from Previous Permit

Changes are highlighted above:

BOD5, Total: Daily max, monthly average and annual average mass TBEL limits added.

Suspended Solids, Total: Concentration monitoring added. Daily max, monthly average and annual average mass limits added.

Phosphorus - The wastewater treatment facility is not able to meet the WQBEL. This permit authorizes the use of trading as a tool to demonstrate compliance with the phosphorus WQBELs. The permittee has entered into a credit purchase agreement with the water quality trading Clearinghouse pursuant to s. 283.84(1)(f), Wis. Stats. This permit includes terms and conditions related to the Credit Verification Package CVP-2024-01 submitted by the water quality trading clearinghouse. The total 'WQT TP Credits' available are designated in a credit purchase agreement between the permittee and Clearinghouse. The credit generator is implementing a variety of management practices including conservation cover and grassed waterways. The Credit Verification Package proposes the generation of 65 lbs/yr of phosphorus credits for the next five years.

Additional WQT subsections in the permit provide information on compliance determinations, annual reporting, and re-opening of the permit.

Arsenic, Copper, and Zinc – Monitoring added.

Chronic WET – Limit changed.

Explanation of Limits and Monitoring Requirements

Refer to the WQBEL memo prepared by Michael Polkinghorn dated July 1, 2024 and to the TBEL memo prepared by Ashley Clark dated May 22, 2025 for the detailed calculations used for this reissuance.

BOD5, Total and Suspended Solids, Total: The permit includes water quality based effluent limits expressed as concentration limits for BOD and categorical limits that are expressed as mass limits for BOD and TSS. The categorical (TBEL) limits are applicable to pollutants or pollutant properties in discharges of process waste resulting from the production of canned fruits and vegetables. Previous permit terms did not include the TBEL limits in error, can cooling water is a process wastewater per s. NR 225.02, Wis. Adm. Code, therefore TBEL limits are applicable.

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 fairness and 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.

Thermal- Requirements for Temperature are included in NR 102 Subchapter II Water Quality Standards for Temperature and NR 106 Subchapter V Effluent Limitations for Temperature. Thermal discharges must meet the Public Health criterion of 120 degrees F and the Fish & Aquatic Life criteria which are established to protect aquatic communities from lethal and sub-lethal thermal effects.

Phosphorus – Phosphorus requirements are based on the Phosphorus Rules that became effective December 1, 2010 as detailed in NR 102 Water Quality Standards and NR 217 Effluent Standards and Limitations for Phosphorus. Chapter NR 217 of the Wis. Adm. Code addresses point source dischargers of phosphorus to surface waters. Currently in NR 217 Wis. Adm. Code there are two methods used to determine if a phosphorus limit is needed: a technology based effluent limit (TBEL) and a water quality based effluent limit (WQBEL). Based on the size and classification of the stream, the water quality criteria for Christie Brook is 0.075 mg/L. In this case, the WQBEL is 0.4 mg/L (monthly average), & 0.13 mg/L (6-month average). For the reasons explained in the April 30, 2012 paper entitled 'Justification for Use of Monthly, Growing Season and Annual Average Periods for Expression of WPDES Permit Limits for Phosphorus Discharges in Wisconsin', WDNR has determined that it is impracticable to express the phosphorus WQBEL for the permittee as a maximum daily, weekly or monthly value. The final effluent limit for phosphorus is expressed as a six-month average. It is also expressed as a monthly average equal to three times the derived WQBEL (which equates to 0.3 mg/L). This final effluent limit was derived from and complies with the applicable water quality criterion. A phosphorus concentration limit is necessary to prevent backsliding during the term of the permit.

The wastewater treatment facility is not able to meet the WQBEL. This permit authorizes the use of trading as a tool to demonstrate compliance with the phosphorus WQBELs. This permit includes terms and conditions related to the Credit Verification Package CVP-2024-01 submitted by the water quality trading clearinghouse. The total 'WQT TP Credits' available are designated in a credit purchase agreement between the permittee and Clearinghouse. The permittee is implementing conservation cover in place of existing row crop agriculture. The credit verification package proposes the generation of 65 lbs/yr of phosphorus credits for the next five years.

Additional WQT subsections in the permit provide information on compliance determinations, annual reporting and re-opening of the permit.

The permittee is using the trading. At the time the limit memo was completed the facility was planning to use the MDV for phosphorus compliance which would have required a more stringent interim TP limit under s. ch. NR 283.16(7), Wis. Adm. Code. Since this permit authorizes WQT, the interim limit is no longer applicable and the minimum control level of 0.68 mg/L as a monthly average (set equal to the existing limit).

PFOS and PFOA: NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Pursuant to s. NR 106.98(3)(b), Wis. Adm. Code, the department evaluated the need for PFOS and PFOA monitoring. Based on information available at the time the proposed permit was drafted, the department has determined the permittee does not need to sample 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.

Arsenic, Copper, and Zinc – Monitoring required in the fourth year of the permit for permit reissuance purposes.

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)

2 Land Treatment – Monitoring and Limitations

2.1 Sample Point Number: 002- PROCESS WW TO SPRAY IRRIGATION

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	
Hydraulic Application Rate	Monthly Avg	6,800 gal/ac/day	Monthly	Calculated	Limit effective June through October.
Hydraulic Application Rate	Monthly Avg	0 gal/ac/day	Monthly	Calculated	Limit effective November through May.
Nitrogen, Total Kjeldahl		mg/L	2/Month	Composite	
Chloride		mg/L	2/Month	Composite	
Nitrogen, Total		mg/L	2/Month	Composite	
Nitrogen, Max Applied On Any Zone	Annual Total	400 lbs/ac/yr	Annual	Calculated	

2.1.1 Changes from Previous Permit:

The flow rate limit was removed in leu of the hydraulic application rate limit.

Total nitrogen monitoring and an annual total max applied to any zone has been added.

2.1.2 Explanation of Limits and Monitoring Requirements

Flow – Flow is required by s. NR 214.14(4)(a), Wis. Adm. Code. Limits on discharge volume are reported under hydraulic application rate for permits utilizing Land Treatment.

HAR – The department is utilizing hydraulic application rate as the parameter to limit volume discharged to land treatment fields, previously this was limited as flow rate in the previous permit. The permittee will report gal/ac/day and compliance with the monthly average limit during the pack season and has a 'zero gal/ac/day hydraulic application rate' limit for the non-pack season. During the non-pack season where no discharge occurs the permittee will report "zero" or no discharge.

Nitrogen – Nutrients, such as nitrogen are essential for plant and animal growth and nourishment, but overabundance in groundwater can cause several adverse health and ecological effects. Nitrogen can be found in many varied forms in the soil due to the nitrogen cycle.

- **Total Kjeldahl Nitrogen** – Sampling is required to determine the organic components of the total nitrogen discharged.
- **Total Nitrogen** – Per s. NR 214.14(3)(c), Wis. Adm. Code, the total nitrogen applied to the land treatment system shall be determined. Total Nitrogen = total Kjeldahl nitrogen (mg/L) + (nitrate+nitrite) nitrogen (mg/L).
- **Nitrate+Nitrite** – Sampling is required by s. NR 206.09(1), Wis. Adm. Code, to determine the remaining component of the total nitrogen discharged.

Nitrogen Max Applied on Any Zone – The annual nitrogen application rate shall be limited to the nitrogen needs of the cover crop plus demonstrable denitrification occurring in the treatment system. The permittee will report the total Nitrogen applied to any zone on the eDMR.

3 Groundwater – Monitoring and Limitations

3.1 Groundwater Monitoring System for Spray Irrigation Field

Location of Monitoring system: E1/2, NE1/4, Sec 22, T28N-R18E, Tn of Gillett, Oconto Co

Groundwater Monitoring Well(s) to be Sampled: MW-2, MW-3, MW-4, MW-6, MW-7

Groundwater Monitoring Well(s) Used to Evaluate Background Groundwater Quality: MW-6

Groundwater Monitoring Well(s) Used for Point of Standards Application: MW-7, MW-4, MW-3, MW-2

Parameter	Units	Preventative Action Limit	Enforcement Standard	Frequency
Depth To Groundwater	feet	N/A	N/A	Quarterly
Groundwater Elevation	feet MSL	N/A	N/A	Quarterly
Nitrogen, Nitrite + Nitrate (as N) Dissolved	mg/L	2.0	10	Quarterly
Chloride Dissolved	mg/L	125	250	Quarterly
pH Field	su	8.1	N/A	Quarterly
Nitrogen, Ammonia Dissolved	mg/L	0.97	9.7	Quarterly
Nitrogen, Organic Dissolved	mg/L	2.4	N/A	Quarterly
Solids, Total Dissolved	mg/L	660	N/A	Quarterly

3.1.1 Changes from Previous Permit:

- Updated preventative action limit for Nitrogen.
- Updated preventative action limit for pH.
- Updated preventative action limit for Nitrogen, Organic Dissolved.
- Updated preventative action limit for Total Dissolved Solids.

3.1.2 Explanation of Limits and Monitoring Requirements

Groundwater limits and requirements are determined in accordance with ch. NR 140, Wis. Adm. Code. Indicator parameter Preventive Action Limit (PAL) values are established per s. NR 140.20 Wis. Adm. Code. Alternative Concentration Limits as allowed under s. NR 140.28, Wis. Adm. Code, are established on a case by case basis.

For more information, please refer to the NR 140 Groundwater Evaluation Report by Woody Myers, Hydrogeologist, dated January 24, 2025.

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

4.1 Sample Point Number: 003- PROCESS WW TO LANDSPREADING

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Volume		gpd	Daily	Total Daily	
Solids, Total		Percent	Monthly	Grab	
Nitrogen, Total Kjeldahl		mg/L	Monthly	Grab	
Chloride		mg/L	Monthly	Grab	
Phosphorus, Total		mg/L	Monthly	Grab	
Phosphorus, Water Extractable		% of Tot P	Monthly	Grab	
Potassium, Total Recoverable		mg/L	Monthly	Grab	

4.1.1 Changes from Previous Permit:

- Total Solids testing added.
- Total Phosphorus testing added.
- Water Extractable Phosphorus testing added.
- Potassium testing added.

4.1.2 Explanation of Limits and Monitoring Requirements

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

4.2 Sample Point Number: 004- BY PROD SOLIDS

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Volume		tons/day	Daily	Total Daily	
Solids, Total		Percent	Quarterly	Grab Comp	
Nitrogen, Total Kjeldahl		Percent	Quarterly	Grab Comp	
Chloride		Percent	Quarterly	Grab Comp	
Phosphorus, Total		Percent	Quarterly	Grab Comp	
Phosphorus, Water Extractable		% of Tot P	Quarterly	Grab Comp	
Potassium, Total Recoverable		Percent	Quarterly	Grab Comp	

4.2.1 Changes from Previous Permit:

- Change in sample frequency and sample type for volume.
- Change in sample type for nitrogen, total Kjedahl, total solids, total phosphorus, and water extractable phosphorus.
- Addition of by-product solids land application monitoring for chloride and total recoverable potassium.

4.2.2 Explanation of Limits and Monitoring Requirements

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

5 Schedules

5.1 Annual Water Quality Trading (WQT) Report

Required Action	Due Date
Annual WQT Report: Submit an annual WQT report that shall cover the first year of the permit term. The WQT Report shall include: The number of pollutant reduction credits (lbs/month) used each month of the previous year to demonstrate compliance; The source of each month's pollutant reduction credits by identifying the approved water quality trading plan that details the source; A summary of the annual inspection of each nonpoint source management practice that generated any of the pollutant reduction credits used during the previous year; and Identification of noncompliance or failure to implement any terms or conditions of this permit with respect to water quality trading that have not been reported in discharge monitoring reports.	01/31/2026
Annual WQT Report #2: Submit an annual WQT report that shall cover the previous year.	01/31/2027
Annual WQT Report #3: Submit an annual WQT report that shall cover the previous year.	01/31/2028
Annual WQT Report #4: Submit the 4th annual WQT report. If the permittee wishes to continue to comply with phosphorus limits through WQT in subsequent permit terms, the permittee shall submit a revised WQT plan including a demonstration of credit need, compliance record of the existing WQT, and any additional practices needed to maintain compliance over time.	01/31/2029
Annual WQT Report Required After Permit Expiration: In the event that this permit is not reissued by the expiration date, the permittee shall continue to submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.	01/31/2030

5.1.1 Explanation of Schedule

Annual Water Quality Trading (WQT) Reports - Reports are required that include the following information:

- Verification that site inspections occurred;
- Results of site inspection findings;
- Identification of noncompliance or failure to implement any terms or conditions of the permit or credit verification package that have not been reported in discharge monitoring reports;
- Any applicable notices of termination or management practice registration; and
- A summary of credits used each month over the calendar year.

5.2 Phosphorus Payment per Pound to County

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

Required Action	Due Date
Annual Verification of Payment: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2026

5.2.1 Explanation of Schedule

Because the permittee was previously on the MDV, one additional payment for the 2025 year will be required.

5.3 Groundwater Monitoring Well Site Map Submittal

Required Action	Due Date
Monitoring Well Site Map: Submit a site map in accordance with s. NR 141.065, Wis. Adm. Code. This site map must include a scale bar and directional arrow and accurately show site structures, property boundaries, nearby surface water and water supply wells and all site groundwater monitoring wells. The groundwater monitoring well latitude/longitude need to be provisioned in decimal degrees.	12/31/2025

5.4 Land Treatment Management Plan

A management plan is required for the land treatment system.

Required Action	Due Date
Land Treatment Management Plan: Submit an update to the management plan to optimize the land treatment system performance and demonstrate compliance with Wisconsin Administrative Code NR 214.	12/31/2025

5.4.1 Explanation of Schedule

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

5.5 Land Application Management Plan

A management plan is required for the land application system.

Required Action	Due Date
Land Application Management Plan: Submit an update to the management plan to optimize the land application system performance and demonstrate compliance with Wisconsin Administrative Code NR 214.	12/31/2025

5.5.1 Explanation of Schedule

An up-to-date Land Application Management plan is a standard requirement in reissued industrial permits per s. NR 214.17(6)(c), Wis. Adm. Code.

Other Comments

The proposed permit is drafted to include requirements for water quality trading under the assumption that the CVP credits have been certified prior to permit reissuance. The department will hold off on reissuing the proposed permit until credits have been certified and the effective date of the permit may be adjusted based on the date of credit certification.

Attachments

Substantial Compliance Determination by Dave Haas, Wastewater Specialist, dated October 17, 2024Water Quality Based Effluent Limits (WQBEL Memo) by Michael Polkinghorn, Water Resources Engineer, dated July 1, 2024

Technology-Based Effluent Limitations for Seneca Foods Corporation Gillett WPDES Permit No. WI-0000345-11 by Ashley Clark, dated May 22, 2025

NR 140 Groundwater Evaluation Report by Woody Myers, Hydrogeologist, dated January 24, 2025.

Seneca Gillett Final WQT Plan dated July 26, 2024.

Seneca Gillett Verification of Pollutant Reduction Credits CVP-2024-01 Letter dated August 8, 2024.

Justification Of Any Waivers From Permit Application Requirements

N/A

Prepared By: Ashley Clark, Wastewater Specialist

Date: April 2, 2025; May 30, 2025