

Permit Fact Sheet

General Information

| | | |
|-----------------------------------|---|------------|
| Permit Number: | WI-0028363-10-1 *Permit Modification | |
| Permittee Name: | SPRING GREEN GOLF CLUB SANITARY DISTRICT #2 | |
| Address: | 1704 South Springs Drive | |
| City/State/Zip: | Spring Green WI 53588 | |
| Discharge Location: | North Bank of unnamed tributary, approximately 150 feet north of County Road "C" and 0.6 miles west of County Road "C" and St. Hwy 23 intersection. | |
| Receiving Water: | Unnamed Tributary of Lowery Creek | |
| Stream Flow (Q _{7,10}): | Lowery Creek: 2.4 cfs | |
| Stream Classification: | <p>Limited Aquatic Life (LAL)</p> <p>Historically, the Unnamed Tributary of Lowery Creek has been classified as limited aquatic life (LAL) for the purposes of calculating effluent limits. However, the Unnamed Tributary of Lowery Creek is not explicitly listed in ch. NR 104, Wis. Adm. Code, so therefore the LAL classification is technically incorrect. But for the purposes of this permit, the Department is continuing the use of the LAL classification until the natural community, which is cool-cold headwater, can be verified. Evaluation at the next permit issuance based on the verified natural community may result in more restrictive limits than are calculated here.</p> | |
| Design Flow(s) | Annual Average | 0.0893 MGD |
| Significant Industrial Loading? | None | |
| Operator at Proper Grade? | Facility is basic with subclasses A1 – Suspended Growth Processes, B – Solids Separation, C – Biological Solids/Sludges, D – Disinfection, SS – Sanitary Sewage Collection System. Two operators are certified. | |
| Approved Pretreatment Program? | <p>N/A</p> <p>\\Central\Water\WQWT Projects\WY_CW_SWAMP\ApprovedPtrProgs.docx</p> | |

Facility Description

The Spring Green Golf Club Sanitary District #2 WWTF provides secondary treatment to domestic wastewater generated in the Spring Green Golf Club Sanitary District service area. Treatment units include mechanical screening, oxidation ditch and covered circular final clarifier secondary treatment, seasonal chlorine contact disinfection, and dechlorination. The effluent discharges to an unnamed tributary of Lowery Creek. Sludge produced is stored in an on-site liquid storage tank and sent to another permitted facility for final treatment and disposal. The facility is designed to treat an average daily flow of 0.0893 MGD.

This permit modification was completed to correct an error in the sampling frequency for Nitrogen, Ammonia Variable Limit.

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|---------------------------------|
| 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 | 0.015 MGD (Nov. 2015 – Nov. 2020 Average) | Representative influent samples shall be collected after influent flow monitoring just prior to the mechanical bar screen. |
| 001 | N/A – Effluent flow not monitored in previous permit term | Representative effluent samples shall be collected at the chlorine contact tank, prior to discharge to the unnamed tributary of Lowery Creek. |
| 002 | N/A – Sludge hauled to another facility | Aerobically digested, Liquid, Class B. Representative sludge samples shall be collected from the sludge storage tank. |

1 Influent - Proposed Monitoring

Sample Point Number: 701- INFLUENT

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

Changes from Previous Permit:

None.

Explanation of Limits and Monitoring Requirements

BOD5 and Total Suspended Solids (TSS) – Tracking of BOD5 and TSS is required for percent removal tracking requirements found in s. NR 210.05, Wis. Adm. Code and Section 5.4.6 of the permit. These are standard monitoring requirements for a municipal treatment facility of this size.

2 Surface Water - Proposed Monitoring and Limitations

Sample Point Number: 001- EFFLUENT

| Monitoring Requirements and Limitations | | | | | |
|---|-------------|-----------------|------------------|----------------------|-------|
| Parameter | Limit Type | Limit and Units | Sample Frequency | Sample Type | Notes |
| BOD5, Total | Weekly Avg | 30 mg/L | 2/Week | 24-Hr Flow Prop Comp | |
| BOD5, Total | Monthly Avg | 20 mg/L | 2/Week | 24-Hr Flow | |

Monitoring Requirements and Limitations

| Parameter | Limit Type | Limit and Units | Sample Frequency | Sample Type | Notes |
|----------------------------------|--------------------------|------------------------|-------------------------|----------------------|--|
| | | | | Prop Comp | |
| Suspended Solids, Total | Weekly Avg | 30 mg/L | 2/Week | 24-Hr Flow Prop Comp | |
| Suspended Solids, Total | Monthly Avg | 20 mg/L | 2/Week | 24-Hr Flow Prop Comp | |
| pH Field | Daily Max | 9.0 su | 2/Week | Grab | |
| pH Field | Daily Min | 6.0 su | 2/Week | Grab | |
| Dissolved Oxygen | Daily Min | 4.0 mg/L | 2/Week | Grab | |
| Nitrogen, Ammonia Variable Limit | | mg/L | Weekly | 24-Hr Flow Prop Comp | Using the daily pH result look up the applicable ammonia limit in the pH Dependent Daily Max Ammonia Table in 2.2.1.2 below & report the variable limit on the daily record (DMR). |
| Nitrogen, Ammonia (NH3-N) Total | Daily Max - Variable | mg/L | Weekly | 24-Hr Flow Prop Comp | Enter the daily ammonia result on the daily record (DMR) and compare the Nitrogen, Ammonia Variable Limit to determine compliance. |
| Nitrogen, Ammonia (NH3-N) Total | Weekly Avg | 55 mg/L | Weekly | 24-Hr Flow Prop Comp | November through April |
| Nitrogen, Ammonia (NH3-N) Total | Weekly Avg | 17 mg/L | Weekly | 24-Hr Flow Prop Comp | May through October |
| Nitrogen, Ammonia (NH3-N) Total | Monthly Avg | 24 mg/L | Weekly | 24-Hr Flow Prop Comp | November through April |
| Nitrogen, Ammonia (NH3-N) Total | Monthly Avg | 6.7 mg/L | Weekly | 24-Hr Flow Prop Comp | May through October |
| Fecal Coliform | Geometric Mean - Monthly | 400 #/100 ml | Weekly | Grab | Interim limit effective May - September annually until the final E. coli limit goes into effect per the "Effluent Limitations for E. coli" Schedule. |
| E. coli | | #/100 ml | Weekly | Grab | Monitoring only May - September annually until the final limit goes into effect per the "Effluent |

Monitoring Requirements and Limitations

| Parameter | Limit Type | Limit and Units | Sample Frequency | Sample Type | Notes |
|--------------------------|--------------------------|------------------------|-------------------------|----------------------|--|
| | | | | | 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 | Weekly | Grab | 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. |
| Chlorine, Total Residual | Daily Max | 19 ug/L | Daily | Grab | May through September |
| Chlorine, Total Residual | Weekly Avg | 7.3 ug/L | Daily | Grab | May through September |
| Chlorine, Total Residual | Monthly Avg | 7.3 ug/L | Daily | Grab | May through September |
| Phosphorus, Total | Monthly Avg | 5.0 mg/L | 2/Week | 24-Hr Flow Prop Comp | This is an interim MDV limit effective through March 31, 2025. See the MDV/Phosphorus subsections and phosphorus schedules. |
| Phosphorus, Total | Monthly Avg | 1.0 mg/L | 2/Week | 24-Hr Flow Prop Comp | This is an interim MDV limit effective on April 1, 2025. See the MDV/Phosphorus subsections 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 |

| Monitoring Requirements and Limitations | | | | | |
|---|------------|-----------------|-------------------|----------------------|---|
| Parameter | Limit Type | Limit and Units | Sample Frequency | Sample Type | Notes |
| | | | | | months that the MDV is in effect) for the calendar year on the Annual report form. |
| Nitrogen, Total Kjeldahl | | mg/L | See Listed Qtr(s) | 24-Hr Flow Prop Comp | Annual in rotating quarters. See Nitrogen Series Monitoring section below. |
| Nitrogen, Nitrite + Nitrate Total | | mg/L | See Listed Qtr(s) | 24-Hr Flow Prop Comp | Annual in rotating quarters. See Nitrogen Series Monitoring section below. |
| Nitrogen, Total | | mg/L | See Listed Qtr(s) | Calculated | Annual in rotating quarters. See Nitrogen Series Monitoring section below. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen. |
| Chloride | | mg/L | Monthly | 24-Hr Flow Prop Comp | January 1, 2024 - December 31, 2024. Monthly monitoring. |
| Copper, Total Recoverable | | ug/L | Monthly | 24-Hr Flow Prop Comp | January 1, 2024 - December 31, 2024. Monthly monitoring. |

Changes from Previous Permit

Permit modification corrected Variable Daily Maximum Ammonia sampling frequency to 'weekly'.

Variable Daily Maximum Ammonia limits and a weekly average of 55 mg/L and a monthly average of 24 mg/L, both for the months of November through April have been added. A Residual Chlorine monthly average limit of 7.3 ug/L has been included for this permit term.

Fecal coliform monitoring and limits have been replaced with *Escherichia coli* (*E. coli*) monitoring and limits. *E. coli* monitoring is required at the permit effective date. An interim fecal coliform limit of 400 #/100 ml as a monthly geometric mean will apply from the permit effective date through the end of a compliance schedule. At the end of the compliance schedule, *E. coli* limits of 126 #/100 ml as a monthly geometric mean that may never 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.

Phosphorus MDV - The permittee has applied for a multi-discharger variance (MDV) for phosphorus for this permit term and the application has been approved by the Department. An MDV interim limit of 1.0 mg/L has been added that goes into effect per a compliance schedule. The permittee is now 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 \$54.99 per pound of phosphorus discharged during the previous year in excess of the target value of 0.2 mg/L.

Total Nitrogen Monitoring (TKN, N02+N03 and Total N): Annual monitoring in rotating quarters throughout the permit term was added to the proposed permit.

Explanation of Limits and Monitoring Requirements

Please refer to the Water Quality Based Effluent Limits (WQBEL) memo prepared by Sarah Luck dated December 8, 2020 for the detailed calculations and explanation.

Note: Throughout this fact sheet all citations of administrative code, for example, s. NR 102.06, Wis. Adm. Code, will be referenced as s. NR 106.02, and reflect current Wisconsin Administrative Code.

Categorical Limits

BOD₅, Total Suspended Solids, pH, and Dissolved Oxygen – Standard municipal wastewater requirements for BOD₅, pH, Total Suspended Solids, and Dissolved Oxygen are included based on NR 210 ‘Sewage Treatment Works’ requirements for discharges to limited aquatic life streams. Chapter NR 102 ‘Water Quality Standards for Surface Waters’ also specifies requirements for pH for fish and aquatic life streams.

Water Quality Based Limits and WET Requirements and Disinfection (if applicable)

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.

Phosphorus – Phosphorus rules became effective December 1, 2010 per NR 217, Wis. Adm. Code, that required the permittee to comply with water quality based effluent limits (WQBELs) for total phosphorus. The final phosphorus WQBELs are 0.225 mg/L as a monthly average and 0.075 mg/L as a six-month average and were to become effective as scheduled unless a variance was granted. For this permit term, the permittee has applied for the Multi-Discharger Variance (MDV) for phosphorus as provided for in s. 283.16, Wis. Stats., and approved by USEPA on February 6, 2017 until February 5, 2027. 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.

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 during the first quarter 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 non-point source (agricultural and urban) phosphorus control strategies at the watershed level.

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.

Total Residual Chlorine – Chlorine is used by the facility for disinfection during the recreation season so effluent limits are recommended to ensure proper de-chlorination. Per NR 210.06(2)(b) Wis. Adm. Code, the total discharge of chlorine must be less than 0.10 mg/L. Revisions to s. NR 106.07(2) and NR 205.065(7), Wis. Adm. Code, have also resulted in the removal of effluent mass limits and the addition of a monthly average limit.

Chloride – If the permittee's effluent data shows that a calculated WQBEL for chloride cannot be met, then the permit will include a chloride effluent limitation. s. NR 106.83 of subchapter VII also provides for some permittees to obtain temporary relief from a chloride WQBEL through the use of a “chloride variance”.

Total Nitrogen Monitoring (NO₂+NO₃, TKN and Total N) – The Department has included effluent monitoring for Total Nitrogen in the permit through the authority under §§ 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 tests are scheduled in the following rotating quarters: **July – September 2021; October – December 2022; January – March 2023; April – June 2024; July – September 2025**

Total Recoverable Copper – Permittee effluent data indicates that copper concentrations are below calculated WQBELs. Monitoring during the third year of the permit term will ensure 11 samples are collected to meet data requirements per NR 200.065 Wis. Adm. Code.

3 Land Application - Proposed 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 | Aerobic Digestion | | Hauled to another facility | Do not land apply |
| Does sludge management demonstrate compliance? Yes | | | | | | |
| Is additional sludge storage required? No | | | | | | |
| Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? No If yes, special monitoring and recycling conditions will be included in the permit to track any potential problems in land applying sludge from this facility | | | | | | |
| Is a priority pollutant scan required? No , design flow is less than 5 MGD. Priority pollutant scans are required once every 10 years at facilities with design flows between 5 MGD and 40 MGD, and once every 5 years if design flow is greater than 40 MGD. | | | | | | |

Sample Point Number: 002- SLUDGE

| Monitoring Requirements and Limitations | | | | | |
|---|--------------|-----------------|------------------|-------------|-------------------------------------|
| Parameter | Limit Type | Limit and Units | Sample Frequency | Sample Type | Notes |
| PCB Total Dry Wt | Ceiling | 50 mg/kg | Once | Composite | January 1, 2023 – December 31, 2023 |
| PCB Total Dry Wt | High Quality | 10 mg/kg | Once | Composite | January 1, 2023 – December 31, 2023 |
| Solids, Total | | Percent | Annual | Composite | |
| Arsenic Dry Wt | Ceiling | 75 mg/kg | Annual | Composite | |
| Arsenic Dry Wt | High Quality | 41 mg/kg | Annual | Composite | |

| Monitoring Requirements and Limitations | | | | | |
|---|--------------|-----------------|------------------|-------------|-------|
| Parameter | Limit Type | Limit and Units | Sample Frequency | Sample Type | Notes |
| Cadmium Dry Wt | Ceiling | 85 mg/kg | Annual | Composite | |
| Cadmium Dry Wt | High Quality | 39 mg/kg | Annual | Composite | |
| Copper Dry Wt | Ceiling | 4,300 mg/kg | Annual | Composite | |
| Copper Dry Wt | High Quality | 1,500 mg/kg | Annual | Composite | |
| Lead Dry Wt | Ceiling | 840 mg/kg | Annual | Composite | |
| Lead Dry Wt | High Quality | 300 mg/kg | Annual | Composite | |
| Mercury Dry Wt | Ceiling | 57 mg/kg | Annual | Composite | |
| Mercury Dry Wt | High Quality | 17 mg/kg | Annual | Composite | |
| Molybdenum Dry Wt | Ceiling | 75 mg/kg | Annual | Composite | |
| Nickel Dry Wt | Ceiling | 420 mg/kg | Annual | Composite | |
| Nickel Dry Wt | High Quality | 420 mg/kg | Annual | Composite | |
| Selenium Dry Wt | Ceiling | 100 mg/kg | Annual | Composite | |
| Selenium Dry Wt | High Quality | 100 mg/kg | Annual | Composite | |
| Zinc Dry Wt | Ceiling | 7,500 mg/kg | Annual | Composite | |
| Zinc Dry Wt | High Quality | 2,800 mg/kg | Annual | Composite | |
| Nitrogen, Total Kjeldahl | | Percent | Annual | Composite | |
| Nitrogen, Ammonium (NH ₄ -N) Total | | Percent | Annual | Composite | |
| Phosphorus, Total | | Percent | Annual | Composite | |
| Phosphorus, Water Extractable | | % of Tot P | Annual | Composite | |
| Potassium, Total Recoverable | | Percent | Annual | Composite | |

Changes from Previous Permit:

New timeframe for monitoring PCBs is now calendar year 2023.

Explanation of Limits and Monitoring Requirements

Requirements for 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).

Water Extractable Phosphorus – Water extractable phosphorus (WEP) is the coefficient for determining plant available phosphorus from measured total phosphorus. In Wisconsin, the Penn State Method is utilized and is expressed in percent.

While a total P may be significant, the WEP may show that only a small percentage of the P is available to plants because of factors such as treatment processes and chemical addition that “tie-up” phosphorus limiting the amount of phosphorus that is plant available. As part of the Wisconsin’s nutrient management plan (NMP) requirements, the accounting of all fertilizers must be included over the NMP cycle. The fertilizer value of the waste needs to be communicated to the farmer and accounted for in the NMP.

4 Schedules

4.1 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 |
|---|------------|
| <p>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.</p> | 05/21/2021 |
| <p>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 soon as possible, but not later than April 30, 2022. The report shall state whether the operational improvements are expected to result in compliance with the final E. coli limitations.</p> <p>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 April 30, 2022.</p> <p>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 April 30, 2022 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’).</p> <p>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.</p> <p>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 April 30, 2025.</p> | 11/30/2021 |
| <p>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.</p> | 04/30/2022 |
| <p>Final Plans and Specifications: The permittee shall submit final construction plans to the</p> | 03/31/2023 |

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| 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. | |
| 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. | 09/30/2023 |
| Construction Upgrade Progress Report: The permittee shall submit a progress report on construction upgrades. | 09/30/2024 |
| Complete Construction: The permittee shall complete construction of wastewater treatment system upgrades. | 03/31/2025 |
| Achieve Compliance: The permittee shall achieve compliance with final E. coli limitations. | 04/30/2025 |

4.1.1 Explanation of Effluent Limitations for 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.

4.2 Phosphorus Multi-Discharger Variance Interim Limit (1.0 mg/L)

The permittee shall comply with the 1.0 mg/L MDV interim effluent limit by the end of this compliance schedule.

| Required Action | Due Date |
|--|------------|
| Submit Final Compliance Plan: 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 modifications are determined to be minor according to the Department. | 09/30/2021 |
| Submit Plans & Specifications: The permittee shall submit final construction plans to the Department for approval pursuant to s. 281.41, Wis. Stats., specifying treatment plant upgrades that must be constructed to achieve compliance with the interim phosphorus effluent limit and a schedule for completing construction of the upgrades by the 'Complete Construction' date specified below. | 03/31/2022 |
| Treatment Plant Upgrade: Upon approval of the final construction plans and schedule by the Department and pursuant to s. 281.41, Wis. Stats., the permittee shall initiate construction of the treatment plant upgrades in accordance with the approved plans and specifications. | 03/31/2023 |
| Construction Upgrade Progress Report: The permittee shall submit a progress report on construction upgrades. | 03/31/2024 |
| Complete Construction and Achieve Compliance: The permittee shall complete construction and achieve compliance with the phosphorus interim effluent limit of 1.0 mg/L. | 03/31/2025 |

4.2.1 Explanation of Phosphorus Multi-Discharger Variance Interim Limit (1.0 mg/L)

Subsection 283.16(6), Wis. Stats., establishes required interim phosphorus effluent limits that must be met for multi-discharger variance (MDV) eligibility. Subsection 283.16(6)(am), Wis. Stats., allows a technology based phosphorus limit of 1.0 mg/L as the MDV interim limit if a permittee certifies that its treatment facility cannot achieve compliance with the

MDV interim limit without a major facility upgrade. The permittee qualifies for a 1.0 mg/L total phosphorus MDV interim limit and the schedule above provides the permittee with four years to comply with that limit.

4.3 Phosphorus Schedule - Optimization Plan

The permittee is required to optimize performance to control phosphorus discharges per the following schedule.

| Required Action | Due Date |
|--|------------|
| Optimization Plan: The permittee shall prepare an Optimization Plan and submit it for Department approval. The plan shall include an evaluation of collected effluent data, possible source reduction measures and operational improvements to optimize performance to control phosphorus discharges. The plan shall contain a schedule for implementation of the measures and improvements. Once the plan is approved by the Department, the permittee shall take the steps called for in the Optimization Plan and follow the schedule of implementation as approved. | 03/31/2022 |
| Progress Report #1: Submit a progress report on optimizing removal of phosphorus. | 03/31/2023 |
| Progress Report #2: Submit a progress report on optimizing removal of phosphorus. | 03/31/2024 |
| Progress Report #3: Submit a progress report on optimizing removal of phosphorus. | 03/31/2025 |
| Progress Report #4: Submit a progress report on optimizing removal of phosphorus. | 03/31/2026 |

4.3.1 Explanation of Phosphorus Schedule – Optimization Plan

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 multi-discharger variance interim limits. This compliance schedule requires the permittee to prepare an optimization plan with a schedule for implementation and submit it for Department approval. The permittee shall take the steps called for in the optimization plan and submit annual progress reports on optimizing the removal of phosphorus.

4.4 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 (\$54.99 per pound)] or \$640,000, whichever is less. See the payment calculation steps in the Surface Water section. The permittee shall submit Form 3200-151 to the Department by March 1 of each calendar year indicating total amount remitted to the participating counties to verify that the correct payment was made. The first payment verification form is due by the specified Due Date. Note: The applicable Target Value is 0.2 mg/L as defined by s. 283.16(1)(h), Wis. Stats. The "per pound" value is \$50.00 adjusted for CPI. | 03/01/2022 |
| Annual Verification of Payment #2: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties. | 03/01/2023 |

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| Annual Verification of Payment #3: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties. | 03/01/2024 |
| Annual Verification of Payment #4: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties. | 03/01/2025 |
| Annual Verification of Payment #5: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties. | 03/01/2026 |
| 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. | |

4.4.1 Explanation of Phosphorus Payment per Pound to County

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 non-point sources of phosphorus within the HUC 8 watershed in which the permittee is located. The permittee has selected the “Payment to Counties” watershed option described in s. 283.16(8), Wis. Stats. Under this option the permittee shall make annual payment(s) to participating county(s) that are calculated based on the amount of phosphorus actually discharged during a calendar year in pounds per year less the amount of phosphorus that would have been discharged had the permittee discharged phosphorus at a target value concentration of 0.2 mg/L. The pounds of phosphorus discharged in excess of the target value is multiplied by a per pound phosphorus charge that will equal \$54.99 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).

Attachments:

Substantial Compliance Determination

Map(s)

Water Quality Based Effluent Limits

Public Notice

MDV Application

MDV Approval

Proposed Expiration Date:

A permit term of five years is proposed in this reissuance with an expiration date of March 31, 2026.

Justification of Any Waivers from Permit Application Requirements

No waivers were requested from application requirements.

Prepared By:

Sean Spencer – Wastewater Specialist

Date: 1/22/2021

cc: Nate Wells

Permit Modification by: Jennifer Jerich – Wastewater Specialist

Date: 1/5/2024