

# Permit Fact Sheet

## General Information

Permit Number	WI-0021601-09-0
Permittee Name and Address	VILLAGE OF BROWNSVILLE PO Box 308, 514 Railroad Street, Brownsville, WI 53006-0308
Permitted Facility Name and Address	Brownsville Wastewater Treatment Facility 466 Prospect Avenue, Brownsville, WI
Permit Term	October 01, 2026 to September 30, 2031
Discharge Location	West bank of Kummel Creek, approx. ¼ mile south of Hwy 49
Receiving Water	Kummel Creek, in the East Branch of the Rock River Watershed (UR13) of the Upper Rock River Basin, in Dodge County
Stream Flow (Q <sub>7,10</sub> )	0.27 cfs
Stream Classification	Limited Forage Fish (LFF) community, non-public water supply and recreational use
Discharge Type	Existing; Continuous
Annual Average Design Flow	0.125 MGD
Industrial or Commercial Contributors	Michels Corporation
Plant Classification	A2 - Attached Growth Processes; A4 - Ponds, Lagoons and Natural Systems; B - Solids Separation; C - Biological Solids/Sludges; P - Total Phosphorus; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

## Facility Description

The Village of Brownsville operates a wastewater treatment facility serving a population of approximately 675 people with a municipal water supply system and one industrial contributor. Wastewater from the Village collection system enters the plant through a comminutor headworks and is pumped to the first of two aerated lagoons. Discharge from lagoon 2 is dosed with phosphorus chemical before entering the rotating biological reactors (RBCs), followed by a sludge settling tank, and tertiary sand filters for final solids removal and polishing. Effluent moves through a final basin (formerly used for disinfection, now conveyance only) prior to the cascade aeration steps and discharge to Kummel Creek on a continuous basis. Sludge from the settling basin is recirculated to lagoon 1. Lagoon sludge was last removed in 2025 and was land applied on Department approved fields. A chemical phosphorus removal system became operational July 2021.

## Substantial Compliance Determination

**Enforcement During Last Permit:** There were no formal enforcement actions taken during the previous permit term.

After a desktop review of all discharge monitoring reports, CMARs, land application reports, compliance schedule items, and a site visit on 9/20/2023 and 3/26/2026, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Jordan Main, Wastewater Engineer on 3/30/2026.

## 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	0.060 MGD (Avg. October 2020 – January 2026)	Influent: 24-hr composite sampler located at the influent wet well. Influent flow is measured by ultrasonic meter and Parshall flume after the comminutor headworks prior to the influent wet well.
001	0.062 MGD (Avg. October 2020 – January 2026)	Effluent: 24-hr composite sampler located in the final basin prior to aeration steps. Effluent grab sample obtained prior to the aeration steps. Effluent flow is measured by ultrasonic meter and Parshall flume after the aeration steps prior to discharge to Kummel Creek.
002	1,010,000 gallons (58 metric tons) land applied in 2025	Lagoon Sludge: Representative lagoon sludge composite grab samples shall be taken from Lagoon 1. If a lagoon is scheduled for desludging, a composite grab sample of just that lagoon sludge may be needed prior to land spreading.

## Permit Requirements

### 1 Influent – Monitoring Requirements

#### 1.1 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	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	Weekly	24-Hr Flow Prop Comp	

##### 1.1.1 Changes from Previous Permit

Influent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit.

- The sample frequency for flow has been changed from “continuous” to “daily” for DMR reporting purposes.

### 1.1.2 Explanation of Limits and Monitoring Requirements

Monitoring of influent flow, BOD<sub>5</sub> and total suspended solids is required by s. NR 210.04(2), Wis. Adm. Code, to assess wastewater strengths and volumes and to demonstrate the percent removal requirements in s. NR 210.05, Wis. Adm. Code, and in the Standard Requirements section of the permit.

## 2 Surface Water - Monitoring and Limitations

### 2.1 Sample Point Number: 001- EFFLUENT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Continuous	
BOD <sub>5</sub> , Total	Daily Max	30 mg/L	Weekly	24-Hr Flow Prop Comp	
BOD <sub>5</sub> , Total	Monthly Avg	15 mg/L	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total	Daily Max	30 mg/L	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	20 mg/L	Weekly	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	35 lbs/day	Weekly	Calculated	Limit applies March-January.
Suspended Solids, Total	Weekly Avg	39 lbs/day	Weekly	Calculated	Limit applies in February.
Suspended Solids, Total	Monthly Avg	21 lbs/day	Weekly	Calculated	Limit applies March-January.
Suspended Solids, Total	Monthly Avg	24 lbs/day	Weekly	Calculated	Limit applies in February.
pH Field	Daily Min	6.0 su	5/Week	Grab	
pH Field	Daily Max	9.0 su	5/Week	Grab	
Dissolved Oxygen	Daily Min	4.0 mg/L	5/Week	Grab	
Nitrogen, Ammonia (NH <sub>3</sub> -N) Total	Daily Max - Variable	mg/L	Weekly	24-Hr Flow Prop Comp	See the Daily Maximum Ammonia Nitrogen (NH <sub>3</sub> -N) Limits permit section.
Nitrogen, Ammonia (NH <sub>3</sub> -N) Total	Weekly Avg	18 mg/L	Weekly	24-Hr Flow Prop Comp	Limit applies October-March.
Nitrogen, Ammonia (NH <sub>3</sub> -N) Total	Weekly Avg	13 mg/L	Weekly	24-Hr Flow Prop Comp	Limit applies in April.

<b>Monitoring Requirements and Limitations</b>					
<b>Parameter</b>	<b>Limit Type</b>	<b>Limit and Units</b>	<b>Sample Frequency</b>	<b>Sample Type</b>	<b>Notes</b>
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	4.1 mg/L	Weekly	24-Hr Flow Prop Comp	Limit applies May-September.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	9.5 mg/L	Weekly	24-Hr Flow Prop Comp	Limit applies October-March.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	5.0 mg/L	Weekly	24-Hr Flow Prop Comp	Limit applies in April.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	2.3 mg/L	Weekly	24-Hr Flow Prop Comp	Limit applies May-September.
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Monitoring and limit effective May through September annually per the Effluent Limitations for E. coli Schedule.
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Monitoring and limit effective May through September annually per the Effluent Limitations for E. coli Schedule. See the E. coli Percent Limit permit section. Enter the result in the DMR on the last day of the month.
Chloride	Weekly Avg	530 mg/L	4/Month	24-Hr Flow Prop Comp	This is an interim limit. Sampling shall be conducted on four consecutive days one week per month. See the Chloride Variance - Implement Source Reduction Measures permit section and the Chloride SRM (Target Value) Schedule.
Chloride		lbs/day	4/Month	Calculated	Calculate the daily mass discharge of chloride in lbs/day on the same days chloride sampling occurs. Mass (lbs/day) = Concentration (mg/L) x Flow (MGD) x 8.34
Arsenic, Total Recoverable		ug/L	Once	24-Hr Flow Prop Comp	Monitoring only January-December 2030. See the Total Recoverable Arsenic

<b>Monitoring Requirements and Limitations</b>					
<b>Parameter</b>	<b>Limit Type</b>	<b>Limit and Units</b>	<b>Sample Frequency</b>	<b>Sample Type</b>	<b>Notes</b>
					Monitoring permit section.
Phosphorus, Total		mg/L	Weekly	24-Hr Flow Prop Comp	
Phosphorus, Total	Monthly Avg	1.26 lbs/day	Weekly	Calculated	Limit applies in January.
Phosphorus, Total	Monthly Avg	1.35 lbs/day	Weekly	Calculated	Limit applies in February.
Phosphorus, Total	Monthly Avg	1.00 lbs/day	Weekly	Calculated	Limit applies in March.
Phosphorus, Total	Monthly Avg	0.80 lbs/day	Weekly	Calculated	Limit applies in April.
Phosphorus, Total	Monthly Avg	0.70 lbs/day	Weekly	Calculated	Limit applies in May.
Phosphorus, Total	Monthly Avg	0.96 lbs/day	Weekly	Calculated	Limit applies in June.
Phosphorus, Total	Monthly Avg	0.90 lbs/day	Weekly	Calculated	Limit applies in July and October.
Phosphorus, Total	Monthly Avg	0.92 lbs/day	Weekly	Calculated	Limit applies in August.
Phosphorus, Total	Monthly Avg	0.84 lbs/day	Weekly	Calculated	Limit applies in September.
Phosphorus, Total	Monthly Avg	1.05 lbs/day	Weekly	Calculated	Limit applies in November.
Phosphorus, Total	Monthly Avg	1.15 lbs/day	Weekly	Calculated	Limit applies in December.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Series Monitoring permit section.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Series Monitoring permit section.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Annual in rotating quarters. See Nitrogen Series Monitoring permit section. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See the Whole Effluent Toxicity (WET) Testing permit section.
Chronic WET		TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	See the Whole Effluent Toxicity (WET) Testing permit section.

### 2.1.1 Changes from Previous Permit

Effluent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit.

- The sample frequency for flow has been changed from “continuous” to “daily” for DMR reporting purposes.
- The sample frequency for pH and DO has been increased from “weekly” to “5/week”.
- The daily maximum ammonia limit has been changed to a variable limit dependent on pH. Additionally, ammonia weekly and monthly average limits were updated.
- Disinfection will now be required May-September annually. Escherichia coli (E. coli) monitoring and limits have been added and become effective per the compliance schedule.
- The permittee has applied for a chloride variance for this permit term. This includes a chloride variance interim limit of 530 mg/L as a weekly average and source reduction measures (SRMs) throughout the permit term.
- One time arsenic monitoring has been added in calendar year 2030.
- The phosphorus interim monthly average concentration-based limit was removed. Monitoring and the phosphorus mass-based Total Maximum Daily Load (TMDL) effluent limits remain.
- Temperature monitoring was removed.
- Annual total nitrogen monitoring (TKN, NO<sub>2</sub>+NO<sub>3</sub> and Total N), in rotating quarters, has been added.
- Acute and chronic whole effluent toxicity (WET) testing has been added.

### 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, by Sarah Luck, Water Resources Engineer, dated February 25, 2026.

**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. The sample frequency for pH and DO was increased to 5/Week.

**Expression of Limits** – In accordance with the federal regulation 40 CFR 122.45(d) and s. NR 205.065, Wis. Adm. Code, limits in this permit are to be expressed as weekly average and monthly average limits whenever practicable.

**Disinfection and 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. Section NR 102.04(5)(a), Wis. Adm. Code, states that all surface waters shall be suitable for recreational use and meet the E. coli criteria established to protect this use. Section NR 102.04(5)(b), Wis. Adm. Code, states that exceptions to the disinfection requirement can be made if the Department determines, in accordance with the procedures specified in s. NR 210.06(3), Wis. Adm. Code, that disinfection is not required to meet water quality criteria. As part of the reissuance process, the requirements for disinfection were reviewed under s. NR 210.06(3), Wis. Adm. Code.

It was determined that the permittee is required to disinfect, during the months of May – September each year. At the end of the compliance schedule, disinfection requirements and 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. Monitoring is not required until the limit becomes effective at the end of the compliance schedule.

**Chloride** – The permittee has applied for a chloride variance, under the provisions of s. NR 106.83, Wis. Adm. Code,

with its application for permit reissuance. The Department reviewed Brownsville’s application for a chloride variance and the information supplied in the application supports the establishment of an interim effluent limit. The permittee and the Department have reached agreement on an interim chloride limit of 530 mg/L (expressed as a weekly average), a target value of 480 mg/L (weekly average), implementation of the chloride source reduction measures (SRMs) plan dated 3/12/2026, and submittal of annual progress reports each year by January 31st. The Department concludes that Brownsville is qualified for a variance from the water quality standard for chloride and proposes reissuance of this permit with the proposed variance.

**Arsenic** – The sample that was collected for the permit reissuance application had a limit of detection (LOD) which is greater than the most stringent calculated limit of 2.66 µg/L based on the human cancer criteria (HCC). Monitoring for total recoverable arsenic is required one time in 2030. The permittee must use an approved analytical test method for total recoverable arsenic such that the LOD is less than or equal to 2.66 µg/L in order to determine the need for arsenic limits at the next permit reissuance in accordance with s. NR 200.027(1), Wis. Adm. Code. The permittee may then use this total recoverable arsenic monitoring data for the next permit reissuance application.

**Total Maximum Daily Load (TMDL)** – The Rock River TMDL Waste Load Allocation (WLA) for Total Phosphorus and Total Suspended Solids was approved by the U.S. Environmental Protection Agency in September 2011. The approved TMDL WLA limits for Total Phosphorus and Total Suspended Solids are:

Month	Monthly Ave TSS Effluent Limit (lbs/day)	Weekly Ave TSS Effluent Limit (lbs/day)	Monthly Ave Total P Effluent Limit (lbs/day)
January	21	35	1.26
February	24	39	1.35
March	21	35	1.00
April	21	35	0.80
May	21	35	0.70
June	21	35	0.96
July	21	35	0.90
August	21	35	0.92
September	21	35	0.84
October	21	35	0.90
November	21	35	1.05
December	21	35	1.15

**Total Nitrogen Monitoring (TKN, NO<sub>2</sub>+NO<sub>3</sub>, and Total N)** – The Department has included effluent monitoring for total nitrogen in the permit through the authority under s. 283.55(1)(e), Wis. Stats. Testing is required during the following quarters: October – December 2026; July – September 2027; April – June 2028; January – March 2029; and October – December 2030.

**Acute WET** – Testing is required during the following quarters: July – September 2027; and October – December 2030.

**Chronic WET** – Testing is required during the following quarters: October – December 2026; July – September 2027; April – June 2028; January – March 2029; and October – December 2030.

### 3 Land Application - Monitoring and Limitations

Municipal Sludge Description						
Sample Point	Sludge Class (A or B)	Sludge Type (Liquid or Cake)	Pathogen Reduction Method	Vector Attraction Method	Reuse Option	Amount Reused/Disposed (Dry Tons/Year)
002	B	Liquid	Fecal Coliform	Incorporation	Land Application	N/A - Lagoon Biosolids
Does sludge management demonstrate compliance? <b>Yes.</b>						
Is additional sludge storage required? <b>No.</b>						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? <b>Yes; Radium-226 is present in the sludge and requires compliance with s. NR 204.07(3)(n), Wis. Adm. Code.</b>						
Is a priority pollutant scan required? <b>N/A</b>						

#### 3.1 Sample Point Number: 002- 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	
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	

<b>Monitoring Requirements and Limitations</b>					
<b>Parameter</b>	<b>Limit Type</b>	<b>Limit and Units</b>	<b>Sample Frequency</b>	<b>Sample Type</b>	<b>Notes</b>
Nitrogen, Total Kjeldahl		Percent	Once	Composite	
Nitrogen, Ammonium (NH4-N) Total		Percent	Once	Composite	
Phosphorus, Total		Percent	Once	Composite	
Phosphorus, Water Extractable		% of Tot P	Once	Composite	
Potassium, Total Recoverable		Percent	Once	Composite	
Radium 226 Dry Wt		pCi/g	Once	Composite	
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Monitoring required in 2027. See Sludge Analysis for PCBs and the Standard Requirements permit section for Monitoring and Calculating PCB Concentrations in Sludge.
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Monitoring required in 2027. See Sludge Analysis for PCBs and the Standard Requirements permit section for Monitoring and Calculating PCB Concentrations in Sludge.
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 permit sections for more information.

### 3.1.1 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.

- The year in which PCB and other lagoon sludge monitoring is required has been updated to 2027.
- Monitoring for PFAS is required once during the permit term pursuant to s. NR 204.06(2)(b)9., Wis. Adm. Code.

### 3.1.2 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), Wis. Adm. Code. 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.

## 4 Schedules

### 4.1 Chloride Source Reduction Measures (Target Value)

As a condition of the variance to the water quality based effluent limitation(s) for chloride granted in accordance with s. NR 106.83(2), Wis. Adm. Code, the permittee shall perform the following actions.

Required Action	Due Date
<p><b>Annual Chloride Progress Report:</b> Submit an annual chloride progress report related to the source reduction activities for the previous year. The annual chloride progress report shall:</p> <p>Indicate which chloride source reduction measures or activities in the Source Reduction Plan have been implemented and state which, if any, source reduction measures from the Source Reduction Plan were not pursued and why. Include an assessment of whether each implemented source reduction measure appears to be effective or ineffective at reducing pollutant discharge concentrations and identify actions planned for the upcoming year;</p> <p>Include an analysis of trends in weekly, monthly and annual average chloride concentrations and total mass discharge of chloride based on chloride sampling and flow data; and</p> <p>Include an analysis of how effluent chloride varies with time and with significant loadings of chloride. Note that the interim limitation listed in the Surface Water section of this permit remains enforceable until new enforceable limits are established in the next permit issuance.</p> <p>The first annual chloride progress report is to be submitted by the Date Due.</p>	03/31/2027
<p><b>Annual Chloride Progress Report #2:</b> Submit the chloride progress report, related to the source reduction activities for the previous year, as defined above.</p>	03/31/2028
<p><b>Annual Chloride Progress Report #3:</b> Submit the chloride progress report, related to the source reduction activities for the previous year, as defined above.</p>	03/31/2029
<p><b>Annual Chloride Progress Report #4:</b> Submit the chloride progress report, related to the source reduction activities for the previous year, as defined above.</p>	03/31/2030
<p><b>Final Chloride Report:</b> Submit the final chloride report documenting the success in meeting the chloride target value of 480 mg/L (weekly average), as well as the anticipated future reduction in chloride sources and chloride effluent concentrations.</p>	03/31/2031

<p>The report shall:</p> <p>Summarize chloride source reduction measures that have been implemented during the current permit term and state which, if any, source reduction measures from the Source Reduction Plan were not pursued and why;</p> <p>Include an assessment of which source reduction measures appear to have been effective or ineffective. Evaluate any needed changes to the pollutant reduction strategy accordingly;</p> <p>Include an analysis of trends in weekly, monthly and annual average chloride concentrations and total mass discharge of chloride based on chloride sampling and flow data during the current permit term; and</p> <p>Include an analysis of how influent and effluent chloride varies with time and with significant loadings of chloride as identified in the source reduction plan.</p> <p>If the permittee intends to reapply for a chloride variance, for the reissued permit, proposed target limits and a detailed source reduction measures plan, outlining the source reduction activities proposed for the upcoming permit term, shall also be included per ss. NR 106.90 (5) and NR 106.83 (4), Wis. Adm. Code. An updated source reduction measures plan shall:</p> <p>Include an explanation of why or how each source reduction measure will result in reduced discharge of the target pollutant; and</p> <p>Evaluate any available information on pollutant sources, timing, and concentration to update the mass balance assumptions and expected sources of the pollutant, and</p> <p>Identify any information needs that would help to better determine pollutant sources and make plans to collect that information.</p> <p>Note that the target value is the benchmark for evaluating the effectiveness of the chloride source reduction measures but is not an enforceable limitation under the terms of this permit.</p>	
<p><b>Annual Chloride Reports After Permit Expiration:</b> In the event that this permit is not reissued by the date the permit expires the permittee shall continue to submit annual chloride reports for the previous year following the due date of Annual Chloride Progress Reports listed above. Annual Chloride Progress Reports shall include the information as defined above.</p>	

#### 4.1.1 Explanation of Schedule

**Chloride Source Reduction Measures (Target Value)** – This schedule is required to ensure that the permittee maintains compliance with the conditions and requirements of receiving a variance from the water quality-based chloride effluent limits. Since a compliance schedule is being granted, an interim limit is required, and that limit is established as 530 mg/L (as a weekly average). The schedule requires that annual reports shall indicate which source reduction measures have been implemented during each calendar year, and an analysis of chloride concentration and mass discharge data based on chloride sampling and flow data. The annual reports shall document progress made towards meeting the chloride target value of 480 mg/L (weekly average) by the end of the permit term.

#### 4.2 Disinfection and Effluent Limitations for E. coli

The permittee shall install disinfection treatment and 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 that requirement.

Required Action	Due Date
<b>Progress Report:</b> The permittee shall submit a progress report on development and submittal of a	06/30/2027

facility plan for upgrades to meet disinfection requirements and E. coli limits.	
<b>Submit Facility Plan:</b> The permittee shall submit a Facility Plan per s. NR 110.09, Wis. Adm. Code for meeting disinfection requirements and complying with E. coli surface water limitations. The permittee may submit an abbreviated facility plan if the Department determines that the modifications are minor.	04/30/2028
<b>Final Plans and Specifications:</b> 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 meet disinfection requirements per s. NR 210.06(1), Wis. Adm Code, achieve compliance with final E. coli limitations, and a schedule for completing construction of the upgrades by the complete construction date specified below.	03/31/2029
<b>Treatment Plant Upgrade to Meet Limitations:</b> 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.	09/30/2029
<b>Construction Upgrade Progress Report:</b> The permittee shall submit a progress report on construction upgrades.	09/30/2030
<b>Complete Construction:</b> The permittee shall complete construction of wastewater treatment system upgrades.	03/31/2031
<b>Achieve Compliance:</b> The permittee shall achieve compliance with final E. coli limitations.	04/30/2031

#### 4.2.1 Explanation of Schedule

**Disinfection and 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 E. coli water quality-based effluent limits while coming into compliance with the limits as soon as reasonably possible.

#### 4.3 Land Application Management Plan

A management plan is required for the land application system.

Required Action	Due Date
<b>Land Application Management Plan Submittal:</b> Submit an update to the management plan to optimize the land application system performance and demonstrate compliance with ch. NR 204, Wis. Adm. Code, by the Due Date. This management plan shall 1) specify information on pretreatment processes (if any); 2) identify land application sites; 3) describe site limitations; 4) address vegetative cover management and removal; 5) specify availability of storage; 6) describe the type of transporting and spreading vehicle(s); 7) specify monitoring procedures; 8) track site loading; 9) address contingency plans for adverse weather and odor/nuisance abatement; and 10) include any other pertinent information. Once approved, all landspreading activities shall be conducted in accordance with the plan. Any changes to the plan must be approved by the Department prior to implementing the changes.	03/31/2031

#### 4.3.1 Explanation of Schedule

**Land Application Management Plan** – An up-to-date Land Application Management Plan is required that documents how the permittee will manage the land application of sludge consistent with ch. NR 204, Wis. Adm. Code.

## 4.4 Desludging Management Plan

Required Action	Due Date
<b>Desludging Management Plan Submittal:</b> The permittee shall submit an amended management plan for approval if removal of sludge will occur during the permit term. At a minimum, the plan shall address how the sludge will be sampled, removed, transported and disposed of. No desludging may occur unless Department approval is obtained. Daily logs shall be kept that record where the sludge has been disposed. The plan is due 60 days prior to desludging.	

### 4.4.1 Explanation of Schedule

**Desludging Management Plan** – An up-to-date Desludging Management Plan is required to be submitted for approval at least 60 days prior to desludging.

## Attachments

WQBEL Memo: Water Quality-Based Effluent Limitations for the Brownsville Wastewater Treatment Facility WPDES Permit No. WI-0021601-09-0, by Sarah Luck, Water Resources Engineer, dated February 25, 2026

Chloride Variance EPA Data Sheet

Chloride Source Reduction Measures (SRM) Plan, Village of Brownsville, dated 3/12/2026

## Justification Of Any Waivers From Permit Application Requirements

No waivers from permit application requirements were requested or granted.

**Prepared By:** Sarah Donoughe, Wastewater Specialist-Adv

**Date:** April 22, 2026