

# Permit Fact Sheet

## General Information

Permit Number:	WI-0032077-09-0	
Permittee Name:	Village of Oxford	
Address:	PO Box 122	
City/State/Zip:	Oxford WI 53952	
Discharge Location	Southwest of the Village on Fandrich Street	
Receiving Water	Neenah Creek (via a short effluent ditch)	
Stream Flow (Q <sub>7,10</sub> )	26 cfs	
Stream Classification	Coldwater sport fish biological community, non-public water supply, recreational uses.	
Design Flow(s)	Annual Average	0.064 MGD
Significant Industrial Loading?	No	
Operator at Proper Grade?	Yes - Municipal systems all require the SS Subclass. Oxford currently only has basic classification in subclasses: A4 – Ponds, Lagoons and Natural Systems; and L – Laboratory  Steve Mullens is the OIC. And he is Advanced for A4-Ponds, Lagoons and Natural Systems.	
Approved Pretreatment Program?	N/A	

## Facility Description

The facility consists of two primary stabilization lagoons and a single secondary lagoon followed by a pair of sand filters that have never been used. The valves are exercised to keep them operating smoothly. Disinfection is not required because the lagoons provide a long detention time (more than 180 days). Sludge that accumulates in the treatment lagoons is occasionally removed and land applied to agricultural fields. The village is budgeting for future sludge removal because the last time it was done was 2006.

## Substantial Compliance Determination

After a desk top review of all discharge monitoring reports, CMARs, land app reports, compliance schedule items, and a site visit on June 8, 2022, this facility has been found to be in substantial compliance with their current permit.

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		Influent - Representative samples of the influent to the facility shall

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
		be collected from the influent diversion box.
001	0.064 MGD (01/01/2018 – 07/31/2022)	Effluent - Representative samples of the effluent from the facility shall be collected from sampling point/outfall 001, which is located one mile downstream from red bridge located on W. Chauncey St.
002	277 metric tons of sludge was removed and land applied in 2006 – the last occurrence of sludge removal from the lagoons	Lagoon Sludge - Liquid sludge that accumulates in the stabilization ponds. Representative samples shall be collected from various locations and depths then composited for analysis. At the time of sample collection the permittee shall evaluate the quantity of sludge in the lagoons and shall submit these findings with the characteristics report form.

## 1 Influent – Monitoring Requirements

### 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	Grab	
Suspended Solids, Total		mg/L	2/Week	Grab	

### Changes from Previous Permit:

No changes.

### Explanation of Limits and Monitoring Requirements

Influent monitoring is needed to assess loading to the facility and treatment performance. Requirements for flow, BOD, and TSS are established in accordance with NR 210.04(2), Wis. Adm. Code.

## 2 Surface Water - Monitoring and Limitations

### 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	

<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>
BOD5, Total	Weekly Avg	45 mg/L	2/Week	Grab	
BOD5, Total	Monthly Avg	30 mg/L	2/Week	Grab	
Suspended Solids, Total	Weekly Avg	45 mg/L	2/Week	Grab	
Suspended Solids, Total	Monthly Avg	30 mg/L	2/Week	Grab	
Suspended Solids, Total	Weekly Avg	27 lbs/day	Monthly	Calculated	
Suspended Solids, Total	Monthly Avg	16 lbs/day	Monthly	Calculated	
pH Field	Daily Min	6.0 su	5/Week	Grab	
pH Field	Daily Max	9.0 su	5/Week	Grab	
Nitrogen, Ammonia Variable Limit		mg/L	Weekly	See Table	Look up the variable ammonia limit from the 'Variable Ammonia Limitation' table and report the variable limit in the Ammonia Variable Limit column on the eDMR.
Nitrogen, Ammonia (NH3-N) Total	Daily Max - Variable	mg/L	Weekly	Grab	Report the daily maximum Ammonia result in the Nitrogen, Ammonia (NH3-N) Total column of the eDMR. See Ammonia Limitation Section.
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	34 mg/L	Weekly	Grab	
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	34 mg/L	Weekly	Grab	
Phosphorus, Total	Monthly Avg	2.9 mg/L	Monthly	Grab	This is an interim limit. See the Phosphorus subsections and phosphorus schedules.
Phosphorus, Total	6-Month Avg	0.082 lbs/day	Monthly	Calculated	Monitoring only upon permit effective date. Final TMDL-based mass limits go into effect per the phosphorus compliance schedule. See Phosphorus TMDL section below.

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Phosphorus, Total		lbs/month	Monthly	Calculated	Calculate the Total Monthly Discharge of phosphorus and report on the last day of the month on the DMR. See standard requirements section 5.4.2 for the appropriate formula.
Phosphorus, Total		lbs/yr	Monthly	Calculated	Calculate the 12-month rolling sum of total monthly mass of phosphorus discharged and report on the last day of the month on the DMR. See standard requirements section 5.4.2 for the appropriate formula.
Chloride		mg/L	Monthly	24-Hr Flow Prop Comp	Monitoring in 2028. Monitoring needed to ensure that 11 sample results are available at the next permit issuance to meet the data requirements of s. NR 106.85, Wis. Adm. Code.
E. coli		#/100 ml	Weekly	Grab	Monitoring only.
E. coli		Percent	Monthly	Calculated	Monitoring only.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Monitoring Series section.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Monitoring Series section.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Annual in rotating quarters. See Nitrogen Monitoring Series section. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite.

### Changes from Previous Permit

**Total Suspended Solids TMDL Limits:** Mass based TSS limits of 27 lbs/ day as a weekly average and 16 lbs/day as a monthly average have been added to the permit to comply with requirements of the Upper Fox Wolf River TMDL. Effluent concentration (mg/L) shall be monitored and reported 2 times per month upon permit reissuance and will be used

to calculate amounts reported for mass-based limits. An additional reporting requirement for lbs/month will be used to calculate the facility's 12-month rolling sum of total monthly discharge, which can be compared directly to the facility's designated WLA.

**Phosphorus TMDL Limits:** An interim limit of 2.9 mg/L goes into effect upon reissuance and will remain in effect unless a more stringent limit is required at a future permit issuance by ss. NR 217.13 and NR 217.16(2), Wis. Adm. Code, or the limit is relaxed following procedures outlined in ch. NR 207, Wis. Adm. Code. Discharge effluent concentration (mg/L) shall be reported Monthly upon permit reissuance and will be used to calculate amounts reported for mass-based parameters. An additional reporting requirement for lbs/month will be used to calculate the facility's 12-month rolling sum of total monthly discharge, which can be compared directly to the facility's designated WLA. Final TMDL WLA-based effluent limits of 0.082 lbs/day as a six-month average and 0.25 lbs/day as a monthly average will go into effect in accordance with compliance schedule 4.1.

## Explanation of Limits and Monitoring Requirements

Please refer to the Water Quality Based Effluent Limitations memo for the Princeton Wastewater Treatment Facility prepared by Nicole Krueger dated April 1, 2024, and used for this reissuance.

**BOD<sub>5</sub>, TSS, and pH:** No changes are recommended in the categorical permit limitations for BOD<sub>5</sub>, TSS and pH. Because the reference effluent flow rates and receiving water characteristics have not changed, limitations for these water quality characteristics do not need to be re-evaluated at this time. Where the receiving water is classified as fish and aquatic life (Warm Water Sport Fish in this case) as defined in s. NR 102.04(3)(b), Wis. Adm. Code the categorical limits for BOD<sub>5</sub>, TSS, and pH are those limits enumerated in ss. NR 210.05(1)(a)-(c), Wis Adm. Code.

**Upper Fox Wolf River Total Maximum Daily Load (TMDL):** The permitted facility is located within the Upper Fox Wolf River Basin Total Maximum Daily Load (TMDL), which was approved by EPA February 27, 2020. The TMDL establishes Waste Load Allocations (WLAs) for point source dischargers and determines the maximum amounts of phosphorus and total suspended solids that can be discharged and still protect water quality. The final effluent limits and monitoring expressed in the permit were derived from and comply with the applicable water quality criterion and are consistent with the assumptions and requirements of the EPA-approved WLAs in the TMDL, which are 23 lbs/yr for phosphorus and 3,119 lbs/yr for TSS for the permitted facility.

The approved TMDL expresses WLAs as lbs/year and lbs/day (maximum annual load divided by 365 days). As outlined in Section 4.6 of the department's 2020 TMDL Implementation Guidance for Wastewater Permits, TMDL limits must be given in the permit that are consistent with the TMDL WLA permit limits derived from TMDL and need to be expressed as specified by 40 CFR 122.45 (d), s. NR 212.76 (4), and s. NR 205.065 (7), Wis. Adm. Code, unless determined to be impracticable. Impracticability has already been determined for phosphorus limits as laid out in the phosphorus impracticability agreement that was approved by USEPA in 2012 (see NPDES MOA Addendum dated July 12, 2012 at <https://prodoasint.dnr.wi.gov/swims/downloadDocument.do?id=167886175>

For phosphorus, continuously discharging facilities covered by the UFWRB TMDL are given monthly average mass limits. If the equivalent effluent concentration is less than or equal to 0.3 mg/L, six-month average mass limits (averaging period of May through October and November through April) are also included. The equivalent effluent concentration of 2.9 mg/L was calculated for the facility, thus, TMDL based mass limits are expressed as a six-month average and a monthly average equal to three times the six-month average limits.

For TSS, continuously discharging municipal facilities covered by the UFWRB TMDL are given a monthly average and weekly average.

Facilities with UFWRB TMDL based effluent limits for phosphorus and TSS must report the 12-month rolling sum of total monthly discharge (lbs/yr). If reported 12-month rolling sums exceed the facility's max annual WLA, the facility's mass limits (monthly average and six-month average) may be recalculated using more appropriate CVs or monitoring frequencies when the permit is reissued to bring discharge levels into compliance with the facility's given WLA.

**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, Wis. Adm. Code establishes the procedure for calculating water quality based effluent limitations (WQBELs) for ammonia.

**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.

**Chloride:** Considering available effluent data from the permit reissuance application, the average of 4 data points is 92.4 mg/L which is less than 1/5<sup>th</sup> of the calculated WQBELs for chloride, therefore no effluent limits are needed. Chloride monitoring is recommended to ensure that 11 sample results are available at the next permit issuance to meet the data requirements of s. NR 106.85, Wis. Adm. Code.

**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.

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.

**Total Nitrogen Monitoring (NO<sub>2</sub>+NO<sub>3</sub>, 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.

**PFAS:** 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 in their effluent 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.

**Monitoring Frequency:** 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.

The Department has been revisiting the sampling frequencies at every facility to evaluate whether current frequencies are appropriate or if an increase is warranted. The frequencies for pH and phosphorus were increased to align Princeton with other facilities of similar size to ensure fairness and in consideration of department guidance of sample frequencies.

Requirements in administrative code (NR 108, 205, 210 and 214 Wis. Adm. Code) and Section 283.55, Wis. Stats., were considered, where applicable, when determining the appropriate monitoring frequencies for pollutants that have final effluent limits in effect during this permit term. The department has determined at this time that the aforementioned changes in monitoring frequency are warranted based on the size and type of the facility.

### 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	Sludge was last removed from lagoons in 2006.			
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>No</b>						
Is a priority pollutant scan required? <b>No</b>						
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- 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	High Quality	41 mg/kg	Once	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Once	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Once	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Once	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Once	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Once	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Once	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Once	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Once	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Once	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Once	Composite	
Nickel Dry Wt	High Quality	420 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>
Nickel Dry Wt	Ceiling	420 mg/kg	Once	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Once	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Once	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Once	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Once	Composite	
Nitrogen, Total Kjeldahl		Percent	Per Application	Composite	
Nitrogen, Ammonium (NH4-N) Total		Percent	Per Application	Composite	
Phosphorus, Total		Percent	Per Application	Composite	
Potassium, Total Recoverable		Percent	Per Application	Composite	
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Analysis required 2025. See the "Sludge Analysis for PCBs" section and the Standard Requirements for more information.
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Analysis required 2025. See the "Sludge Analysis for PCBs" section and the Standard Requirements for more information.
PFOA + PFOS		ug/kg	Once	Calculated	Report the sum of PFOA and PFOS. See PFAS permit sections for more information.
PFAS Dry Wt			Once	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

**Changes from Previous Permit:**

PCB: Monitoring for PCBs in the year 2025 has been added to the proposed permit.

PFAS: One time sludge monitoring is included in the permit pursuant s. NR 204.06(2)(b)9, Wis. Adm. Code.



## 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), Wis. Adm. Code. Requirements for pathogens are specified in s. NR 204.07(6), Wis. Adm. Code, and in s. NR 204.07 (7), Wis. Adm. Code, for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k), Wis Adm. Code. Radium requirements are addressed in s. NR 204.07(3)(n), Wis. Adm. Code.

**PFAS:** The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA is currently developing a risk assessment to determine future land application rates and expects to release this risk assessment by the end of 2024. In the interim, the department has developed the “Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS”.

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 the proposed WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9, Wis. Adm. Code.

**PCB:** PCBs are not expected to be present due to the lack of any industrial or commercial discharges. Pursuant to s. NR 204.06(2)(c), Wis Adm. Code, PCB monitoring may be included with a monitoring frequency of ‘once’ every other permit term.

**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 Sludge Management Plan

Required Action	Due Date
<p><b>Submit a Sludge Management Plan:</b> The permittee shall submit an update to the management plan for approval if removal of sludge will occur during this permit term. The plan shall demonstrate compliance with ch. NR 204 Wis. Adm. Code and at minimum address 1) How and where is sludge sampled; 2) Available sludge storage details and location(s); 3)How will the sludge be removed with details on volume, characterization and how will the treatment plant continue to function during the drawdown; 4) Describe the type of transportation and spreading vehicles and loading and unloading practices; 5) Identify approved land application sites, apply for needed sites, site limitations, total acres needed and vegetative cover management; 6) Specify record keeping procedures including site loading; 7) Address contingency plans for adverse weather and odor/nuisance abatement; and 8) Include any other pertinent information such as other disposal options that may be used or specifications of any pretreatment processes</p> <p>Once approved, all sludge management activities shall be conducted in accordance with the plan. Any changes to the plan must be approved by the Department prior to implementing the changes. No desludging may occur unless approval from the Department is obtained. Daily logs shall be kept that</p>	

record where the sludge has been disposed.	
Submit an updated management plan 60 days prior to land application of municipal sludge.	

### Explanation of Schedule

If the permittee wishes to land apply sludge from the lagoons during the permit term, they must submit a plan detailing how the sludge will be handled and where it will be applied for the Department to approve. The plan must be submitted at least 60 days prior to the sludge being applied.

### 4.2 Water Quality Based Effluent Limits (WQBELs) for Total Phosphorus

The permittee shall comply with the WQBELs for Phosphorus 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 requirement.

Required Action	Due Date
<p><b>Operational Evaluation Report:</b> The permittee shall prepare and submit to the Department for approval an operational evaluation report. The report shall include an evaluation of collected effluent data, possible source reduction measures, operational improvements or other minor facility modifications that will optimize reductions in phosphorus discharges from the treatment plant during the period prior to complying with final phosphorus WQBELs and, where possible, enable compliance with final phosphorus WQBELs by <b>June 30, 2027</b>. The report shall provide a plan and schedule for implementation of the measures, improvements, and modifications as soon as possible, but not later than <b>June 30, 2027</b>, and state whether the measures, improvements, and modifications will enable compliance with final phosphorus WQBELs. Regardless of whether they are expected to result in compliance, the permittee shall implement the measures, improvements, and modifications in accordance with the plan and schedule specified in the operational evaluation report.</p> <p>If the operational evaluation report concludes that the facility can achieve final phosphorus WQBELs using the existing treatment system with only source reduction measures, operational improvements, and minor facility modifications, the permittee shall comply with the final phosphorus WQBEL by <b>June 30, 2027</b>, and is not required to comply with the milestones identified below for years 3 through 9 of this compliance schedule ('Preliminary Compliance Alternatives Plan', 'Final Compliance Alternatives Plan', 'Final Plans and Specifications', 'Treatment Plant Upgrade to Meet WQBELs', 'Complete Construction', 'Achieve Compliance').</p> <p><b>STUDY OF FEASIBLE ALTERNATIVES</b> - If the Operational Evaluation Report concludes that the permittee cannot achieve final phosphorus WQBELs with source reduction measures, operational improvements and other minor facility modifications, the permittee shall initiate a study of feasible alternatives for meeting final phosphorus WQBELs and comply with the remaining required actions of this schedule of compliance. If the Department disagrees with the conclusion of the report, and determines that the permittee can achieve final phosphorus WQBELs using the existing treatment system with only source reduction measures, operational improvements, and minor facility modifications, the Department may reopen and modify the permit to include an implementation schedule for achieving the final phosphorus WQBELs sooner than <b>June 30, 2033</b>.</p>	06/30/2025
<p><b>Compliance Alternatives, Source Reduction, Improvements and Modifications Status:</b> The permittee shall submit a 'Compliance Alternatives, Source Reduction, Operational Improvements and Minor Facility Modification' status report to the Department. The report shall provide an update on the permittee's: (1) progress implementing source reduction measures, operational improvements, and minor facility modifications to optimize reductions in phosphorus discharges and, to the extent that such measures, improvements, and modifications will not enable compliance with the WQBELs,</p>	06/30/2026

(2) status evaluating feasible alternatives for meeting phosphorus WQBELs.	
<p><b>Preliminary Compliance Alternatives Plan:</b> The permittee shall submit a preliminary compliance alternatives plan to the Department.</p> <p>If the plan concludes upgrading of the permittee’s wastewater treatment facility is necessary to achieve final phosphorus WQBELs, the submittal shall include a preliminary engineering design report.</p> <p>If the plan concludes Adaptive Management will be used, the submittal shall include a completed Watershed Adaptive Management Request Form 3200-139 without the Adaptive Management Plan.</p> <p>If water quality trading will be undertaken, the plan must state that trading will be pursued.</p>	06/30/2027
<p><b>Final Compliance Alternatives Plan:</b> The permittee shall submit a final compliance alternatives plan to the Department.</p> <p>If the plan concludes upgrading of the permittee’s wastewater treatment is necessary to meet final phosphorus WQBELs, the submittal shall include a final engineering design report addressing the treatment plant upgrades, and a facility plan if required pursuant to ch. NR 110, Wis. Adm. Code.</p> <p>If the plan concludes Adaptive Management will be implemented, the submittal shall include a completed Watershed Adaptive Management Request Form 3200-139 and an engineering report addressing any treatment system upgrades necessary to meet interim limits pursuant to s. NR 217.18, Wis. Adm. Code.</p> <p>If the plan concludes water quality trading will be used, the submittal shall identify potential trading partners.</p> <p>Note: See ‘Alternative Approaches to Phosphorus WQBEL Compliance’ in the Surface Water section of this permit.</p>	06/30/2028
<p><b>Progress Report on Plans &amp; Specifications:</b> Submit progress report regarding the progress of preparing final plans and specifications. Note: See ‘Alternative Approaches to Phosphorus WQBEL Compliance’ in the Surface Water section of this permit.</p>	06/30/2029
<p><b>Final Plans and Specifications:</b> Unless the permit has been modified, revoked and reissued, or reissued to include Adaptive Management or Water Quality Trading measures or to include a revised schedule based on factors in s. NR 217.17, Wis. Adm. Code, the permittee shall submit final construction plans to the Department for approval pursuant to s. 281.41, Stats., specifying treatment plant upgrades that must be constructed to achieve compliance with final phosphorus WQBELs, and a schedule for completing construction of the upgrades by the complete construction date specified below. (Note: Permit modification, revocation and reissuance, and reissuance are subject to s. 283.53(2), Stats.)</p> <p>Note: See 'Alternative Approaches to Phosphorus WQBEL Compliance' in the Surface Water section of this permit.</p>	06/30/2030
<p><b>Treatment Plant Upgrade to Meet WQBELs:</b> The permittee shall initiate construction of the upgrades. The permittee shall obtain approval of the final construction plans and schedule from the Department pursuant to s. 281.41, Stats. 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. Note: See 'Alternative Approaches to Phosphorus WQBEL Compliance' in the Surface Water section of this permit.</p>	09/30/2030
<p><b>Construction Upgrade Progress Report #1:</b> The permittee shall submit a progress report on construction upgrades. Note: See 'Alternative Approaches to Phosphorus WQBEL Compliance' in</p>	09/30/2031

the Surface Water section of this permit.	
<b>Construction Upgrade Progress Report #2:</b> The permittee shall submit a progress report on construction upgrades. Note: See 'Alternative Approaches to Phosphorus WQBEL Compliance' in the Surface Water section of this permit.	06/30/2032
<b>Complete Construction:</b> The permittee shall complete construction of wastewater treatment system upgrades. Note: See 'Alternative Approaches to Phosphorus WQBEL Compliance' in the Surface Water section of this permit.	05/31/2033
<b>Achieve Compliance:</b> The permittee shall achieve compliance with final phosphorus WQBELs. Note: See 'Alternative Approaches to Phosphorus WQBEL Compliance' in the Surface Water section of this permit.	06/30/2033

## Explanation of Schedule

Total phosphorus (TP) effluent limits in lbs/day are calculated as recommended in the TMDL Development and Implementation Guidance: Integrating the WPDES and Impaired Waters Programs (April 2020) and are based on the annual phosphorus wasteload allocation (WLA) given in pounds per year. This WLA found in Appendix H of the Total Maximum Daily Loads for Total Phosphorus and Total Suspended Solids in the Upper Fox and Wolf River Basins (UFW TMDL) report dated February 2020 are expressed as maximum annual loads (lbs/year).

An interim limit is required per s. NR 217.17, Wis. Adm. Code, when a compliance schedule is needed in the permit to meet the WQBEL. The interim limit should reflect a concentration that the facility is able to meet without investing in additional “temporary” treatment, but also should prevent backsliding from current conditions. Therefore, it is recommended that the interim limit be set equal to 2.9 mg/L for permit reissuance along with requirements for optimization of phosphorus removal.

## Attachments:

Water Quality-Based Effluent Limitations for Oxford Wastewater Treatment Facility WPDES Permit No. WI-0032077-09, Dated April 1, 2024

**Expiration Date:** June 30, 2029

## Justification Of Any Waivers From Permit Application Requirements

No waivers from permit application requirements granted.

**Prepared By:** Sarah Adkins Wastewater Specialist

**Date:** May 23, 2024