

Permit Fact Sheet

General Information

Permit Number	WI-0028754-11-0
Permittee Name and Address	Western Racine Co Sewerage Dist P O Box 177, Rochester, WI 53167
Permitted Facility Name and Address	Western Racine County Sewerage District 1020 NORTH RIVER ROAD
Permit Term	October 01, 2026 to September 30, 2031
Discharge Location	North bank of the Fox (IL) River, one quarter mile west of the Highway 83 bridge. (Lat: 42.72° N Long: -88.22° W)
Receiving Water	Fox (IL) River, Fox (IL) River Watershed, Fox (IL) River Basin, in Racine County
Stream Flow (Q _{7,10})	39 cfs
Stream Classification	Warm Water Sport Fish (WWSF); non-public water supply, recreational use.
Discharge Type	Existing and Continuous
Annual Average Design Flow (MGD)	2.53 MGD
Industrial or Commercial Contributors	Avidity Science
Plant Classification	Advanced; A1 - Suspended Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; P - Total Phosphorus; D - Disinfection; L - Laboratory; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

The Western Racine County Sewerage District WWTP has an annual average design flow rate of 2.53 million gallons per day (MGD) and serves a population of approximately 11,200 from three communities: the Village of Rochester, the Village of Waterford and the Town of Waterford. The treatment plant was upgraded in 2024. The surface aerators in both aeration basins were replaced with fine membrane diffusers and blowers. The aeration basins are now formatted with anaerobic, anoxic, and oxic zones to facilitate enhanced biological nutrient removal. The treatment plant accepts wastewater from one significant industrial user (Avidity Science), domestic holding tank waste, and septic tank waste. Influent is pumped to the preliminary treatment building for screening and grit removal. Return sludge is mixed with screened influent and ferrous chloride is added to aid in phosphorus removal. The wastewater then flows to one of three Orbal oxidation ditches, operated in parallel. From the inner ring of the Orbal ditches, the wastewater flows to one of four clarifiers and then travels to the UV building for disinfection prior to discharge to the Fox (IL) River. Waste sludge is processed in a DAFT (Dissolved Air Flotation Thickening) unit and sludge is stored onsite until being land applied by a contract hauler to Department approved agricultural sites.

Substantial Compliance Determination

Enforcement During Last Permit:

A Notice of Noncompliance (NON) was issued 12/12/2023 in response to the 11/29/2023 Sanitary Sewer Overflow event. The facility has completed all previously required actions as part of the enforcement process.

After a desk top review of all discharge monitoring reports, CMARs, land app reports, compliance schedule items, and a site visit on **September 18, 2025**, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Jacob Van Susteren-Wedesky on November 20, 2025.

Sample Point Descriptions

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
701	1.18 MGD (2025)	INFLUENT: 24-hour flow proportional composite samples shall be collected after the bar screen and prior to grit removal. Influent samples are collected prior to combining with sidestream flows. Influent flow is monitored via a Parshall flume and ultrasonic sensor located after grit removal.
103	N/A	FIELD BLANK: Collect total recoverable mercury field blanks at the same time and location as the mercury effluent sample using standard sample handling procedures
001	1.16 MGD (2025)	EFFLUENT: 24-hour flow proportional composite samples and grab samples shall be collected from the effluent channel prior to UV disinfection. Grab samples for E. coli shall be collected after UV disinfection. Flow shall be monitored via a Parshall flume and ultrasonic sensor located in the UV treatment tank before the UV bulbs.
601	N/A	In-stream Sampling Point 601: Representative water samples shall be collected from the Fox River. Sample point 601 is located near WI State Hwy 36, downstream of the Western Racine County Sewerage District outfall and upstream of the confluence of Eagle Creek and the Fox River (Lat: 42.723 Long:-88.223) Sample point 601 correlates with the sample location described in the approved AM Plan No. AM-2026-04 (July 2026).
002	410 U.S. Tons (2025 Application)	Aerobically digested, Class B liquid sludge, thickened using a Dissolved Air Flotation (DAF) system. Representative sludge samples shall be collected from the storage tank after mixing.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- INFLUENT TO PLANT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Continuous	
BOD5, Total		mg/L	5/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	5/Week	24-Hr Flow Prop Comp	
Mercury, Total Recoverable		ng/L	Quarterly	24-Hr Flow Prop Comp	See Mercury Monitoring permit section.

1.1.1 Changes from Previous Permit:

Influent limitations and monitoring requirements were evaluated for this permit term, the monitoring frequencies for BOD5 and TSS were updated to match the effluent requirements.

1.1.2 Explanation of Limits and Monitoring Requirements

Monitoring of influent flow, BOD5 and total suspended solids is required by s. NR 210.04(2), Wis. Adm. Code, to assess wastewater strengths and volumes and to demonstrate the percent removal requirements in s. NR 210.05, Wis. Adm. Code, and in the Standard Requirements section of the permit.

2 Inplant - Monitoring and Limitations

2.1 Sample Point Number: 103- Mercury Effluent Blanks

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Mercury, Total Recoverable		ng/L	Quarterly	Blank	See Mercury Monitoring section.

2.1.1 Changes from Previous Permit:

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

2.1.2 Explanation of Limits and Monitoring Requirements

Mercury Field Blank- Monitoring is included in the permit pursuant to s. NR 106.145, Wis. Adm. Code. Field blanks must meet the requirements under s. NR 106.145(9) and (10), Wis. Adm. Code. The permittee shall collect a mercury field blank for each set of mercury samples (a set of samples may include a combination of influent, effluent or other samples all collected on the same day). Field blanks are required to verify a sample has not been contaminated during collection, transportation or analysis.

3 Surface Water - Monitoring and Limitations

3.1 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	
BOD5, Total	Weekly Avg	45 mg/L	5/Week	24-Hr Flow Prop Comp	
BOD5, Total	Monthly Avg	30 mg/L	5/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	45 mg/L	5/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	30 mg/L	5/Week	24-Hr Flow Prop Comp	
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Nitrogen, Ammonia (NH3-N) Total	Daily Max	17 mg/L	3/Week	24-Hr Flow Prop Comp	
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	15 mg/L	3/Week	24-Hr Flow Prop Comp	January
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	16 mg/L	3/Week	24-Hr Flow Prop Comp	February, July, August, December
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	17 mg/L	3/Week	24-Hr Flow Prop Comp	March-June, September, November
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	12 mg/L	3/Week	24-Hr Flow Prop Comp	October
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	15 mg/L	3/Week	24-Hr Flow Prop Comp	January
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	16 mg/L	3/Week	24-Hr Flow Prop Comp	February, July, August, December
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	17 mg/L	3/Week	24-Hr Flow Prop Comp	March-June, September, November
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	12 mg/L	3/Week	24-Hr Flow Prop Comp	October
E. coli	Geometric Mean - Monthly	126 #/100 ml	2/Week	Grab	May-September
E. coli	% Exceedance	10 Percent	Monthly	Calculated	May-September. See the E. coli Percent Limit permit section. Enter the result in

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					the DMR on the last day of the month.
Chloride		mg/L	Monthly	24-Hr Flow Prop Comp	Monitoring only in 2030.
Mercury, Total Recoverable		ng/L	Quarterly	Grab	See Mercury monitoring section.
PFOS		ng/L	1/ 2 Months	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need schedule.
PFOA		ng/L	1/ 2 Months	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need schedule.
Phosphorus, Total	Monthly Avg	1.0 mg/L	5/Week	24-Hr Flow Prop Comp	
Phosphorus, Total	6-Month Avg	0.5 mg/L	5/Week	24-Hr Flow Prop Comp	This is an Adaptive Management interim limit that will go in effect upon reissuance.
Phosphorus, Total		lbs/day	5/Week	Calculated	Calculate the daily mass discharge of phosphorus in lbs/day on the same days phosphorus sampling occurs.
Nitrogen, Total Kjeldahl		mg/L	Quarterly	24-Hr Flow Prop Comp	
Nitrogen, Nitrite + Nitrate Total		mg/L	Quarterly	24-Hr Flow Prop Comp	
Nitrogen, Total		mg/L	Quarterly	Calculated	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	Annually in rotating quarters. See 'WET' section.
Chronic WET	Monthly Avg	3.4 TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annually in rotating quarters. See 'WET' section.

3.1.1 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. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

- **BOD, TSS, pH, Ammonia, E. Coli, Nitrogen Series-** The sample frequency updated.
- **PFOS and PFOA** – Monitoring once every two months is included in the permit in accordance with s. NR 106.98(2)(b), Wis. Adm. Code.

3.1.2 Explanation of Limits and Monitoring Requirements

Detailed discussions of limits and monitoring requirements can be found in the attached water quality-based effluent limits (WQBEL) memo dated April 24, 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. Changes have been made to BOD, TSS, pH, Ammonia, E. Coli, and Nitrogen Series. Prior frequencies were below the minimum recommended in the guidance document. These updated frequencies align Western Racine with the minimum requirements for a facility of this design flow. The department has determined the minimum sample frequency is appropriate based on good compliance history and Western Racine being previously below the minimum. Monitoring frequencies are evaluated every permit term and may be increased at a future reissuance.

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 averages and monthly averages** whenever practicable.

PFOS and PFOA – NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. At the first reissuance of a WPDES permit after August 1, 2022, the new rule requires WPDES permits for major municipal dischargers with an average flow rate greater than 1 MGD but less than 5 MGD, at a minimum sample effluent once every two-months for PFOS and PFOA pursuant s. NR 106.98(2)(b), Wis. Adm. Code.

A sample frequency of 1/2 months means one sample is taken during any two-month period. Examples of 1/2 month sample would be every other month (Jan, March, May, etc.) or back-to-back months with a break in between (February & March, May & June, Aug & Sept, etc.). DMR Short Forms will be generated for the following time periods: January-February, March-April, May-June, July-August, September-October, and November-December. At a minimum one sample result will be present on each form.

The initial determination of the need for sampling shall be conducted for up to two years in order to determine if the permitted discharge has the reasonable potential to cause or contribute to an exceedance of the PFOS or PFOA standards under s. NR 102.04(8)(d)1, Wis. Adm. Code.

Total Phosphorus – The proposed permit will be Western Racine’s second permit term under new administrative rules for phosphorus discharges that took effect December 1, 2010. Details regarding the administrative rules for phosphorus discharges may be found at: <https://dnr.wisconsin.gov/topic/Wastewater/Phosphorus>. Phosphorus rules are contained in s. NR 102.06 and ch. NR 217, Subchapter III. A monthly average interim limit of 1 mg/L is effective upon reissuance. An Adaptive Management Interim limit of 0.5 mg/L expressed as a 6-month average (averaging period of May through October and November through April) becomes effective upon reissuance.

Adaptive Management for Total Phosphorus Compliance – Western Racine requested and the Department approved a plan to implement a watershed adaptive management approach under s. NR 217.18, Wis. Adm. Code and s. 283.13(7) Wis. Stats. as a means for Western Racine to achieve compliance with the phosphorus water quality standard in s. NR

102.06, Wis. Adm. Code. The phosphorus limitations and conditions in this permit reflect the approved Adaptive Management (AM) Plan AM-2026-04 (July 2026). The permittee shall design and implement the actions identified in the approved AM Plan No. in accordance with the goals and measures identified. The goal of the AM plan is to reduce phosphorus loadings within the watershed action area by at a minimum 32 lbs/yr by the end of this permit term. In addition, annual progress reports are required. See Schedules section for more details. The Department may terminate the AM option based on the reasons enumerated in NR 217.18(3)(e)2, Wis. Adm. Code.

The permit contains an interim adaptive management phosphorus limit of 0.5 mg/L expressed as a six-month seasonal average. The averaging periods for the six-month average limit are May through October and November through April. Compliance with the 0.5 mg/L six-month interim limit is evaluated at the end of each six-month period on April 30 and October 31 annually. The 1.0 mg/L monthly average phosphorus limit in effect for the duration of the reissued permit.

Surface water monitoring requirements are included in the proposed permit in support of the goals and measures of the Adaptive Management Plan and are discussed in more detail in following subsections of this fact sheet. Sampling is required on the day(s) each week as outlined in the approved Adaptive Management Plan.

3.2 Sample Point Number: 601- Fox River - Downstream

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow River		cfs	Monthly	Measure	Provide an estimate of river flow for each day that in-stream phosphorus monitoring is performed May 1 through October 31 annually.
Flow River		cfs	Per Occurrence	Measure	Voluntary river flow estimates for each day that in-stream phosphorus monitoring is performed November 1 through April 30 annually.
Phosphorus, Total		mg/L	Monthly	Grab	Collect samples monthly May 1 through October 31 annually. See permit subsections for sampling and reporting requirements.
Phosphorus, Total		mg/L	Per Occurrence	Grab	Voluntary monitoring November 1 through April 30 annually. See permit subsections for sampling and reporting requirements.
Phosphorus, Total		lbs/month	Monthly	Calculated	Calculate and report total monthly phosphorus loads for the months of May

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					through October annually. See permit subsection for calculation of total monthly loads.
Phosphorus, Total		lbs/month	Per Occurrence	Calculated	Calculated total phosphorus loads may also be reported for the months of November through April, as data is available. See Permit Subsection for calculation of total monthly loads.

3.2.1 Changes from Previous Permit

Effluent limitations and monitoring requirements were evaluated for this permit term and no changes were required in this permit section. Sampling requirements and frequencies are the same as the previous permit.

3.2.2 Explanation of Limits and Monitoring Requirements

As part of the Adaptive Management Plan requirements, downstream monitoring for river flow rate, in-stream phosphorus concentration and total monthly in-stream phosphorus loads is required during the months of May through October. Monitoring for these same parameters is voluntary during the months of November through April. When voluntary monitoring is completed, results must be reported on the monthly eDMR. The in-stream phosphorus concentration and river flow rate are used to calculate the total monthly loading of phosphorus in the Fox (IL) River on a monthly basis. This monitoring will allow the permittee to demonstrate reductions in phosphorus loading for each month of the year.

4 Land Application - Monitoring and Limitations

Municipal Sludge Description						
Sample Point	Sludge Class (A or B)	Sludge Type (Liquid or Cake)	Pathogen Reduction Method	Vector Attraction Method	Reuse Option	Amount Reused/Disposed (Dry Tons/Year)
002	B	Liquid	Fecal Coliform	Injection	Land Application	410
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 landapplying sludge from this facility						
Is a priority pollutant scan required? No						

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)
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.						

4.1 Sample Point Number: 002- Sludge

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Solids, Total		Percent	Quarterly	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Quarterly	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Quarterly	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Quarterly	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Quarterly	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Quarterly	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Quarterly	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Quarterly	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Quarterly	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Quarterly	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Quarterly	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Quarterly	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Quarterly	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Quarterly	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Quarterly	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Quarterly	Composite	
Nitrogen, Total Kjeldahl		Percent	Quarterly	Composite	
Nitrogen, Ammonium (NH ₄ -N) Total		Percent	Quarterly	Composite	
Phosphorus, Total		Percent	Quarterly	Composite	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Phosphorus, Water Extractable		% of Tot P	Quarterly	Composite	
Potassium, Total Recoverable		Percent	Quarterly	Composite	
Radium 226 Dry Wt		pCi/g	Annual	Composite	
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Once in 2027
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Once in 2027
PFOA + PFOS		ug/kg	Annual	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

4.1.1 Changes from Previous Permit:

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

PFAS –Monitoring is required annually pursuant to s. NR 204.06(2)(b)9., Wis. Adm. Code.

4.1.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA has developed a draft risk assessment to determine future land application rates and released this risk assessment in January of 2025. The department is evaluating this new information. Until a decision is made, the “Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS” should be followed

Collecting sludge data on PFAS concentrations from a wide range of wastewater treatment facilities will help protect public health from exposure to elevated levels of PFAS and determine the department’s implementation of EPA’s recommendations. To quantitate this risk, PFAS sampling has been included in this WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

5 Schedules

5.1 Watershed Adaptive Management Option Annual Report Submittals

The permittee shall submit annual reports on the implementation of AM Plan No. AM-2026-04 (July 2026) as specified in the “Phosphorus Limitation(s) and Adaptive Management Requirements” permit section and the following schedule.

Required Action	Due Date
Annual Adaptive Management Report: Submit an annual adaptive management report. The annual adaptive management report shall: - o Identify those actions from Section 3 the approved adaptive management plan that were completed during the previous calendar year and those actions that are in progress; - o Evaluate collected monitoring data; - o Document progress in achieving the goals and measures identified in the approved adaptive management plan; - o Describe the outreach and education efforts that occurred during the past calendar year; - o Identify any corrections or adjustments to the adaptive management plan that are needed to achieve compliance with the phosphorus water quality standards specified in s. NR 102.06, Wis. Adm. Code; - o Describe any updates needed to Western Racine’s approved phosphorus optimization plan; and - o Submit results from all sample points outlined in AM plan No. AM-2026-04 (July 2026) to the Department using the Department's Laboratory Data Entry System (LDES)	03/31/2027
Annual Adaptive Management Report #7: Submit an Adaptive Management report with the required information described in this section (see above).	03/31/2028
Annual Adaptive Management Report #8: Submit an Adaptive Management report with the required information described in this section (see above).	03/31/2029
Annual Adaptive Management Report #9: Submit an Adaptive Management report with the required information described in this section (see above).	03/31/2030
Final Adaptive Management Report for 2nd Permit Term: Submit the final Adaptive Management (AM) report documenting progress made during the second permit term under AM in meeting the watershed phosphorus reduction target of 396 lbs/yr , as well as the anticipated future reductions in phosphorus sources and phosphorus effluent concentrations, which shall be measured in accordance with the AM Plan protocols. The report shall summarize AM activities that have been implemented during the current permit term and state which, if any, actions from the approved AM plan No. AM-2026-04 (July 2026) were not pursued and why. The report shall include an analysis of trends on both a monthly and six-month average basis for concentrations and mass effluent discharged. Additionally, there shall be an analysis of any improvements to the quality of surface waters in the Adaptive Management Action Area focusing on phosphorus and flow results collected during the permit term. The surface water analysis shall evaluate how the in-stream loadings have changed over the permit term in comparison to implemented AM actions.	03/31/2031
Achieve Water Quality Standards and Adaptive Management Plan Success: All the receiving waters identified within the AM plan AM-2026-04 (July 2026) shall comply with water quality standards specified in s. NR 102.06, Wis. Adm. Code. The permittee shall continue to comply with applicable effluent limits (required under s. 217.18(3)(e)3. expressed as a 6-month avg and 1.0 mg/L monthly avg) and continue monitoring surface waters per AM-2026-04 (July 2026) at a minimum of monthly May through October for total phosphorus.	09/30/2031

5.1.1 Explanation of Schedule

This compliance schedule requires the permittee to submit annual adaptive management (AM) annual reports that show progress towards meeting the goals and measures contained in the approved AM plan. The final AM Report for this permit term must document the success of meeting the watershed phosphorus minimum reduction target of 396 lbs/yr. The compliance schedule may be modified at permit reissuance, should changes in AM goals and measures or timing necessitate different dates for schedule items.

Pursuant to s. NR 217.18(1) Wis. Adm. Code., phosphorus water quality criteria must be achieved “as soon as possible”. The duration for this adaptive management schedule is 8 years. This timeframe is consistent with the approved adaptive management plan, and represents the shortest possible duration based upon the following factors that influence time required for the water body to achieve the phosphorus criterion:

- Magnitude of point and/or nonpoint source phosphorus reductions required
- Costs associated with point and/or nonpoint source phosphorus reductions
- For nonpoint source reductions, the time required to contact landowners and receive adequate participation to implement practices
- Physical characteristics of the watershed and receiving water, including landuse, soil properties, slopes, channel gradient, and level of legacy sediment/phosphorus currently in the system

5.2 PFOS/PFOA Minimization Plan Determination of Need

Required Action	Due Date
Report on Effluent Discharge: Submit a report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations. This analysis should also include a comparison to the applicable narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results.	09/30/2027
Report on Effluent Discharge and Evaluation of Need: Submit a final report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations of data collected over the last 24 months. The report shall also provide a comparison on the likelihood of the facility needing to develop a PFOS/PFOA minimization plan. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results. The permittee shall also submit a request to the department to evaluate the need for a PFOS/PFOA minimization plan. If the Department determines a PFOS/PFOA minimization plan is needed based on a reasonable potential evaluation, the permittee will be required to develop a minimization plan for Department approval no later than 90 days after written notification was sent from the Department. The Department will modify or revoke and reissue the permit to include PFOS/PFOA minimization plan reporting requirements along with a schedule of compliance to meet WQBELs. Effluent monitoring of PFOS and PFOA shall continue as specified in the permit until the modified permit is issued.	09/30/2028

If, however, the Department determines there is no reasonable potential for the facility to discharge PFOS or PFOA above the narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code, no further action is required and effluent monitoring of PFOS and PFOA shall continue as specified in the permit.	
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5.2.1 Explanation of Schedule

As stated above, ch. NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Section NR 106.98, Wis. Adm. Code, specifies steps to generate data in order to determine the need for reducing PFOS and PFOA in the discharge. Data generated per the effluent monitoring requirements will be used to determine the need for developing a PFOS/PFOA minimization plan. As part of the schedule, the permittee is required to submit two annual Reports on Effluent Discharge.

If the Department determines that a minimization plan is needed, the permit will be modified or revoked/reissued to include additional requirements.

5.3 Land Application Management Plan

A management plan is required for the land application system.

Required Action	Due Date
Land Application Management Plan Submittal: Submit a 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.	09/30/2027

5.3.1 Explanation of Schedule

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

Attachments

Water Quality Based Effluent Limits dated 04/24/2026

Adaptive Management Plan dated 12/31/2025

Adaptive Management Conditional Approval letter dated 7/10/2026

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Marissa Fleege Wastewater Specialist

Date: 7/9/2026

