

Permit Fact Sheet

General Information

Permit Number	WI-0020923-10-0
Permittee Name and Address	City of Weyauwega 109 E. Main St P O Box 578, Weyauwega, WI 54983
Permitted Facility Name and Address	Weyauwega Wastewater Treatment Facility 103 Minton Avenue, Weyauwega, Wisconsin
Permit Term	April 01, 2026 to March 31, 2031
Discharge Location	103 Minton Avenue, Weyauwega, WI; QQ NW S4 T21N R13E; lat/long 44.32581N, 88.93160W
Receiving Water	Waupaca River in Waupaca River Watershed of Wolf River Basin in Waupaca County
Stream Flow (Q _{7,10})	115 cfs
Stream Classification	Warm Water Sport Fish (WWSF) Community; Non-public Water Supply
Discharge Type	Existing; Continuous
Annual Average Design Flow (MGD)	0.711 MGD
Industrial or Commercial Contributors	5 industrial contributors with Agropur bring the most significant, discharging pretreated dairy wastewater that makes up over half of the influent loading to the Weyauwega WWTP
Plant Classification	A1 - Suspended Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; P - Total Phosphorus; D - Disinfection; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

The City of Weyauwega owns and operates an activated sludge wastewater facility. Treatment processes include; preliminary treatment with vertical screening and grit removal, anaerobic selector basin and secondary-biological treatment using extended aeration activated sludge. There are 8-aeration tanks. In tank 7, ferric chloride is added and in tank 8 polymer is added to assist in solids settling. These units are followed by final clarification. Seasonal disinfection is achieved with UV disinfection from May – September. Phosphorus is removed chemically with ferric chloride. Effluent is discharged on a continuous basis via Outfall 001 to the north bank of the Waupaca River, approx. 0.25 mi east of the City of Weyauwega Dam.

The facility receives pretreated industrial wastewater from Agropur, which is located near the Weyauwega WWTP, as well as holding tank waste as hauled waste. Agropur is a cheese making facility and their wastewater makes up over half of the influent loading to the WWTP.

Substantial Compliance Determination

After a desk top review of all discharge monitoring reports, CMARs, CMOMs, land app reports, compliance schedule items, and a site visit on December 17, 2025, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Barti Oumarou, Compliance Engineer on January 16, 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	0.67 MGD (2021-2024)	INFLUENT: Flow is measured after the raw wastewater pumps in pump room. 24-hr flow proportional samples shall be collected from the raw wastewater wet well.
001	0.67 MGD (2021-2024)	EFFLUENT: Flow measurements and 24-hr flow proportional composite samples shall be collected from the UV channel after disinfection. Grab samples shall be collected at the outfall on the north bank of the Waupaca River, approximately 1/4 mile east of the dam in Weyauwega.
002	1,877 metric tons (2024)	LAND APPLICATION: Lime stabilized cake sludge samples shall be collected from the sludge storage building.

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	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	3/Week	24-Hr Flow Prop Comp	

1.1.1 Changes from Previous Permit:

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

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 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	
BOD5, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow Prop Comp	
BOD5, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	280 lbs/day	3/Week	Calculated	
Suspended Solids, Total	Monthly Avg	200 lbs/day	3/Week	Calculated	
Suspended Solids, Total		lbs/month	Monthly	Calculated	Calculate the Total Monthly Discharge of TSS and report on the last day of the month on the DMR. See TMDL Calculations section below.
Suspended Solids, Total		lbs/yr	Monthly	Calculated	Calculate the 12-month rolling sum of total monthly mass of TSS discharged and report on the last day of the month on the DMR. See TMDL Calculations section below.
pH Field	Daily Max	9.0 su	5/Week	Grab	
pH Field	Daily Min	6.0 su	5/Week	Grab	
Fecal Coliform	Geometric Mean - Monthly	400 #/100 ml	Weekly	Grab	Limit effective with reissuance until completion of the E. coli compliance

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					schedule.
E. coli		#/100 ml	Weekly	Grab	Monitoring only May through September annually until the final limit goes into effect per the Effluent Limitations for E. coli Schedule.
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Limit Effective May through September beginning in 2030 per the Effluent Limitations for E. coli Schedule.
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit Effective May through September beginning in 2030 per the Effluent Limitations for E. coli Schedule. See the E. coli Percent Limit section below. Enter the result in the DMR on the last day of the month.
Nitrogen, Ammonia (NH3-N) Total	Daily Max	13 mg/L	3/Week	24-Hr Flow Prop Comp	Monitoring year round, limit effective June – September.
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	13 mg/L	3/Week	24-Hr Flow Prop Comp	Effective June – September.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	13 mg/L	3/Week	24-Hr Flow Prop Comp	Effective June – September.
Phosphorus, Total	Monthly Avg	1.0 mg/L	3/Week	24-Hr Flow Prop Comp	
Phosphorus, Total	Monthly Avg	4.2 lbs/day	3/Week	Calculated	Monitoring only upon permit effective date. Final TMDL-based mass limits go into effect per the phosphorus compliance schedule. See Phosphorus TMDL section in the permit.
Phosphorus, Total	6-Month Avg	1.4 lbs/day	3/Week	Calculated	Monitoring only upon permit effective date. Final TMDL-based mass limits go into effect per the

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					phosphorus compliance schedule. See Phosphorus TMDL section in the permit.
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 TMDL Calculations section in the permit.
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 TMDL Calculations section in the permit.
Chloride		mg/L	Monthly	24-Hr Flow Prop Comp	Monitoring only in 2028.
Copper, Total Recoverable		mg/L	Monthly	24-Hr Flow Prop Comp	Monitoring only in 2028.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Series Monitoring section below.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Annual in rotating quarters. See Nitrogen Series Monitoring section in the permit.
Nitrogen, Total		mg/L	See Listed Qtr(s)	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	See WET section.
PFOS		ng/L	1/ 2 Months	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					Section.
PFOA		ng/L	1/ 2 Months	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need 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. See additional explanation of limits under “Explanation of Limits and Monitoring Requirements” below.

- **Total Suspended Solids TMDL Limits** - Mass based TSS limits of 280 lbs/day as a weekly average and 200 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 3 times per week 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.
- **pH** – Sample frequency changed from “3/week” to “5/week”.
- **E. coli**- Fecal coliform monitoring and limits have been replaced with Escherichia coli (E. coli) monitoring and limits. Limits effective following a compliance schedule.
- **Nitrogen, Ammonia** – Daily variable, weekly, and monthly limits added. Sample frequency changed from “weekly” to “3/week”.
- **Phosphorus TMDL Limits** - An interim limit of 1.0 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 3 times per week 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 4.2 lbs/day as a monthly average and 1.4 lbs/day as a six-month average will go into effect in accordance with Water Quality Based Effluent Limits (WQBELs) for Total Phosphorus compliance schedule.
- **Chloride** – Monthly monitoring in 2028 added.
- **Total Nitrogen Monitoring (TKN, N02+N03 and Total N)**- Annual monitoring is required in specific quarters as outlined in the permit.
- **PFOS and PFOA** – Monitoring every other month is included in the permit in accordance with s. NR 106.98(2)(a), Wis. Adm. Code.

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 dated December 17, 2024.

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 was changed from “3/week” to “5/week” based off the monitoring frequency guidance.

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 and monthly average limits whenever practicable.

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 (UFWRB 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 439 lbs/yr for phosphorus and 50,070 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 the 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://apps.dnr.wi.gov/swims/Documents/DownloadDocument?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 0.203 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/industrial facilities covered by the UFWRB TMDL are given monthly average and weekly average/daily max mass limits.

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.

Nitrogen, Ammonia – Sample frequency was changed from “weekly” to “3/week” to align with monitoring frequency guidance.

Chloride - 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, in order to determine the need for limits in the next permit.

Total Nitrogen Monitoring (NO₂+NO₃, TKN and Total N): The Department has included effluent monitoring for Total Nitrogen in the permit through the authority under §§ 283.55(1)(e), Wis. Stats., which allows the department to require the permittee to submit information necessary to identify the type and quantity of any pollutants discharged from the point source, and through s. NR 200.065(1)(h), Wis. Adm. Code, which allows for this monitoring to be collected during the permit term. More information on the justification to include total nitrogen monitoring in wastewater permits can be found in the “Guidance for Total Nitrogen Monitoring in Wastewater Permits” dated October 1, 2019. Annual tests

are scheduled in the following rotating quarters: **July – September 2026; April – June 2027; January – March 2028; October – December 2029; July – September 2030.**

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.

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	Cake	Lime Stabilization & Confirm with Fecal Coliform Monitoring	Lime Stabilization	Land Application	293 dry tons
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						
Is a priority pollutant scan required? No						

3.1 Sample Point Number: 002- LIME STABILIZED CAKE 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	

Monitoring Requirements and Limitations

Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
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 (NH4-N) Total		Percent	Quarterly	Composite	
Phosphorus, Total		Percent	Quarterly	Composite	
Phosphorus, Water Extractable		Percent	Quarterly	Composite	
Potassium, Total Recoverable		Percent	Quarterly	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.

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

PCB – Monitoring once in 2027.

PFAS –Monitoring is required annually 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), Wis. Adm. Code for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k).

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 Effluent Limitations for E. coli

The permittee shall comply with surface water limitations for E. coli as specified. No later than 14 days following each compliance date, the permittee shall notify the Department in writing of its compliance or noncompliance. If a submittal is required, a timely submittal fulfills the notification

Required Action	Due Date
Status Update: The permittee shall submit information within the discharge monitoring report (DMR) comment section documenting the steps taken in preparation for properly monitoring and testing for E. coli including, but not limited to, selected test method and location of sampling.	07/01/2026
Progress Report: The permittee shall submit a report on the progress of meeting the final E.coli limits.	04/01/2027
Progress Report: The permittee shall submit a report on the progress of meeting the final E.coli limits.	04/01/2028
Progress Report: The permittee shall submit a report on the progress of meeting the final E.coli limits.	04/01/2029
Achieve Compliance: The permittee shall achieve compliance with final E. coli limitations.	04/01/2030

4.1.1 Explanation of Schedule

A compliance schedule is included in the permit to provide time for the permittee to investigate options for meeting new effluent E. coli water quality-based effluent limits while coming into compliance with the limits as soon as reasonably possible.

4.2 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>Operational Evaluation Report: 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 April 1, 2029. The report shall provide a plan and schedule for implementation of the measures, improvements, and modifications as soon as possible, but not later than April 1, 2029 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 April 1, 2029 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>STUDY OF FEASIBLE ALTERNATIVES - 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 April 1, 2035.</p>	10/01/2026
<p>Compliance Alternatives, Source Reduction, Improvements and Modifications Status: 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, (2) status evaluating feasible alternatives for meeting phosphorus WQBELs.</p>	01/01/2027
<p>Preliminary Compliance Alternatives Plan: 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</p>	04/01/2027

<p>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>	
<p>Final Compliance Alternatives Plan: 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>	10/01/2027
<p>Progress Report on Plans & Specifications: 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>	04/01/2028
<p>Final Plans and Specifications: 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>	10/01/2028
<p>Treatment Plant Upgrade to Meet WQBELs: 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>	04/01/2029
<p>Construction Upgrade Progress Report #1: 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.</p>	10/01/2029
<p>Construction Upgrade Progress Report #2: 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.</p>	04/01/2030

Complete Construction: 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.	10/01/2030
Achieve Compliance: 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.	03/01/2031

4.2.1 Explanation of Schedule

Subchapter NR 217.17, Wis. Adm. Code, allows the department to provide a schedule of compliance for water quality-based phosphorus limits where the permittee cannot immediately achieve compliance. This compliance schedule requires the permittee to comply with the final water quality-based phosphorus limits within 5 years.

The permittee may be required to meet the final phosphorus WQBEL sooner than March 31, 2031 (less than 5 years) if the required “Operational Evaluation Report” concludes that the phosphorus WQBEL can be met using the existing treatment system with only source reduction measures, operational improvements and minor facility modifications. Also, the permittee will conduct a “Study of Feasible Alternatives” to determine whether Water Quality Trading or Adaptive Management, either alone or in combination with plant upgrades will allow the plant to meet the phosphorus WQBEL.

The department believes that the compliance schedule suggested in the draft permit provides the appropriate length of time for the permittee to evaluate these options, implement the chosen option and meet the final phosphorus limits (WQBELs).

4.3 PFOS/PFOA Minimization Plan Determination of Need

Required Action	Due Date
<p>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.</p> <p>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.</p>	04/01/2027
<p>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.</p> <p>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.</p> <p>The permittee shall also submit a request to the department to evaluate the need for a PFOS/PFOA minimization plan.</p> <p>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</p>	04/01/2028

<p>of PFOS and PFOA shall continue as specified in the permit until the modified permit is issued.</p> <p>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.</p>	
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4.3.1 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.

4.4 Sludge Management Plan

A sludge management plan is required.

Required Action	Due Date
<p>Sludge Management Plan Submittal: Submit a sludge management plan (SMP) to optimize the sludge management performance and demonstrate compliance with Ch. NR 204, Wis. Adm. Code, by the Due Date. This management plan shall include sufficient detail of the sludge management program for the facility. The plan shall include separate sections for each type of sewage sludge included in this permit.</p> <p>The SMP shall provide standardized information for communication to operators and the department including but not limited to the following:</p> <ol style="list-style-type: none"> 1) Specify information on the sludge treatment processes for each sampling point and outfall; 2) Show and describe sample point and outfall monitoring locations on a schematic and provide photos of the specific sampling points; 3) Show, describe and tabulate the monitoring requirements at each sampling point and outfall locations; 4) Show, describe and explain sampling protocols for each location listing parameters to be monitored including: <ol style="list-style-type: none"> a) Pollutants, b) Nutrients, c) Pathogen treatment process requirements including treatment temperature, moisture content (total solids) and pathogen densities (fecal concentrations), d) Vector Reduction appropriate for the pathogen treatment process such as but not limited to temperatures, volatile solids reduction, moisture content, etc. as required by the WPDES permit and Ch. NR 204, Wis. Adm. Code; 5) Monitoring frequencies at each sample point and outfall; 	<p>04/01/2027</p>

<p>6) Analytical methods with appropriate hold times and chain of custody procedures;</p> <p>7) Documentation relating to temperature monitoring data recording, retrieval and printing out the data when requested;</p> <p>8) Storage, verification monitoring, loading, transportation and discharge details associated with all outfalls;</p> <p>9) Collection, storage, disposal information for sludge detailing pickups including loading and similar details;</p> <p>10) Collection, storage and disposal processes of sludge when the sludge does not meet minimum requires to meet Class B requirements.</p> <p>11) Identify land application sites;</p> <p>12) Describe site limitations;</p> <p>13) Address vegetative cover management and removal including loading to crop needs, crop harvesting;</p> <p>14) Specific the availability of storage for sludge;</p> <p>15) Describe the type of transportation and spreading vehicles;</p> <p>16) Track site loadings to facility’s land application sites;</p> <p>17) Address contingency plans for adverse weather and odor/nuisance abatement;</p> <p>18) Address construction contingencies when treatment equipment is out of service; and</p> <p>19)Include any other pertinent information.</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.</p> <p>Note: The SMP is a living document and should be designed and constructed to allow for future updates. Consider providing an overview to explain the facilities solids flow processes, then using sections and appendices to provide more details. The use of appendices to explain start up, operation and shutdown of the sludge treatment units is encouraged to show that all sludge particles meet Class A requirements.</p>	
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4.4.1 Explanation of Schedule

An up-to-date Sludge 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 Limitations for the Weyauwega Wastewater Treatment Facility WPDES Permit No. WI-0020923-10-0, by Michael Polkinghorn, dated December 17, 2024

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Ashley Clark, Wastewater Specialist

Date: January 27, 2026