311 Walnut Street | P.O. Box 487
Marathon City, WI 54448
Tel: 715-443-2221
www.marathoncitywi.gov

VILLAGE UTILITY COMMISSION

OFFICIAL NOTICE & AGENDA

Wednesday, January 28, 2026
4:00 pm
Marathon Municipal Center

1. **CALL TO ORDER**
   UTILITY ROLL CALL: A. BERENS, B. BOHR, M. TELFORD, D. SEILER, K. HANDRICK JR.

2. **PLEDGE OF ALLEGIANCE**

3. **RECOGNITION OF VISITORS**
   a. Virtual Meeting Guidelines
      i. This meeting will be recorded and available upon request
   b. Public Participation at Government Meetings

4. **APPROVAL OF DECEMBER 17, 2025 MEETING MINUTES**

5. **REVIEW AND APPROVAL OF PAYMENT OF BILLS**

6. **PUBLIC UTILITY OPERATIONS & FACILITIES REPORT**

7. **UNFINISHED BUSINESS**
   a. Update on Well #5
   b. Update on Cure-In-Place-Piping Project
   c. Update on 4th Street Lift Station

8. **NEW BUSINESS**
   a. Discussion on Maraview Drive Water Main Break
   b. Discuss Draft WPDES (Wisconsin Pollutant Discharge Elimination System) Permit

9. **SCHEDULED MEETINGS**
   a. Regular Meeting: Wednesday, February 25, 2026 – 4:00 pm
   b. Special Meetings as Needed

10. **ADJOURNMENT**

PUBLIC VIRTUAL ACCESS
Join Teams Meeting: https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting
Meeting ID: 261 174 214 35
Passcode: cY2jA33d

Andrew Berens.
Utility Commission Chair
Cassie Lang
Village Clerk / Deputy Treasurer

VILLAGE UTILITY COMMISSION

MINUTES

Wednesday, December 17, 2025

1. **CALL TO ORDER at 4:01 pm**
   UTILITY ROLL CALL: A. BERENS-Present, B. BOHR-Present, M. TELFORD-Present, D. SEILER-Present, K. HANDRICK JR.-Absent

2. **PLEDGE OF ALLEGIANCE**

3. **RECOGNITION OF VISITORS**
   a. Virtual Meeting Guidelines
      i. This meeting will be recorded and available upon request
   b. Public Participation at Government Meetings
      Attended Virtually: Kevin O'Brien – Record Review

4. **APPROVAL OF OCTOBER 29, 2025 MEETING MINUTES**
   MOTION – Approve Minutes from October 29, 2025 Utility Commission Meeting
   Motion made by Bohr second by Berens. Motion passed by voice vote.

5. **REVIEW AND APPROVAL OF PAYMENT OF BILLS**
   Commission members questioned the following Bill Payments:
   Check 49137 – Northern Lake Service, Inc. – disinfection by product testing
   Check 49213 – Joann Draeger – utility refund for duplicate payment
   Check 49220 – First Supply, LLC. – lug repair and parts replacement from 8th St water main break
   MOTION – Approve Payment of Bills
   Motion made by Telford second by Seiler. Motion passed by voice vote.

6. **PUBLIC UTILITY OPERATIONS & FACILITIES REPORT**
   Director of Public Works, Ken Bloom, presented the Commission with an update of daily happenings and projects for November and December in his Facilities Report. The report can be found in the Agenda Packet.

7. **UNFINISHED BUSINESS**
   a. Update on Well #5
      Administrator Cherek reported that Strand Associates worked with him and Director of Public Works, Bloom, to present to the PSC and the DNR a need assessment for a new municipal well. Cherek believes in the near future Strand will be requesting financial data to help determine where rates would need to go to cover loan for new municipal well. No further updates were given.

   b. Update on Cure-In-Place-Piping Project
      Cherek informed the Commission that a contract with Visu-Sewer was approved for the cure-in-place piping project at the December 3rd Village Board meeting. Visu-Sewer, a company the Village has utilized on past projects, came in with the lowest bid at $450,745.75 for 11,525 linear feet of pipe. The bid came in under budget about $196,000. Cherek and Bloom agreed to apply the extra budgeted money to have Visu-Sewer televise and clean an additional area near Tower Park

to determine possible future need to line that area. Televising this section at the same time of televising the planned project area will save the Commission on mobilization fees. Cherek has not yet received the signed contract back from Visu-Sewer with their anticipated timeline for the project.

8. NEW BUSINESS

9. SCHEDULED MEETINGS

a. Regular Meeting: Wednesday, January, 28, 2026 – 4:00 pm
b. Special Meetings as Needed

10. ADJOURNMENT at 5:08 pm

Motion to adjourn made by Telford second by Seiler. Motion passed by voice vote.

Cassie Lang
Village Clerk / Deputy Treasurer

Marathon City Utility Operations & Facilities Report

For January 2026

Water Treatment Facility Report

The water facility is operating well and meeting all the testing requirements.

On November 9th, the fire hydrant on the south side of 4th Street, just west of Pheasant Lane, was hit by a vehicle, completely breaking off the hydrant and associated piping from the underground watermain. PGA was hired to install a new fire hydrant and 2 new service valves. This was completed by PGA on December 8th. An insurance claim, on behalf of the Utility, will be submitted to cover the costs of the repair.

> **UPDATE –** The total cost of the repair was $16,990.00. This is the amount that will be submitted to the insurance company for reimbursement.

The potassium permanganate mixing/transfer pump has failed at the Water Treatment Plant. The pump is the original pump that was installed at the time the Water Plant was built in 2000. They no longer manufacture parts for this make and model of pump. A new Grundfos transfer pump was ordered through Brabazon Pump & Compressor. Village/Utility Staff will install the new pump at the Water Plant.

> **UPDATE –** The new Grundfos potassium permanganate mixing/transfer pump, at the water plant, has been installed and put in service.

Aaron Martin, Water Operator, claims the water utility is losing approximately 60,000 gallons of water per day. Wisconsin Rural Water Association has previously tried to locate any water leaks in the distribution system with no success. WRWA plans to be onsite again in the next week or so to continue searching for any potential water loss. (Listening on fire hydrants, water valves, etc., to pinpoint the location of any potential water leak)

Residential water meter replacements have resumed for 2026. Residential water meters are required to be calibrated or replaced once every 10 years. Approximately 50-60 meters are replaced annually.

A new 2” water meter will be installed in the new Menzner Hardwoods Building north of Highway 29.

A new 2” water meter replacement, will also be installed at the assisted living facility (The Meadows of Marathon) on Maratech Avenue.

Wisconsin Rural Water Association (WRWA) has recommended that all water utilities join the National Rural Water Association Lawsuit, if PFAS was detected in your water supply, even if it is below the current hazard index. Marathon City Waterworks has submitted our information to the Rural Water PFAS Settlement. (See attached email from WRWA)

Wastewater Treatment Facility Report

The wastewater treatment plant met all WPDES permit limits for the month of December 2025.

Wastewater Treatment Plant Laboratory Proficiency Testing, required annually by the WDNR, has been completed for BOD, cBOD, TSS, Ammonia, and Total Phosphorus. A passing result for each parameter accredits the laboratory to perform these analysis for the next calendar year. Results should be received in early February.

The 2025 Total Phosphorus Credit Offset Report for Miltrim Farms has been completed. The wastewater treatment facility discharged a total of 335.71 lbs. of phosphorus to the Big Rib River in 2025. The target loading according to the Multi-Discharger Variance calculation, is 135.47 lbs. of phosphorus. This leaves the Utility needing 200.24 lbs. of phosphorus credits from Miltrim Farms, to comply with our WPDES permit. The total cost to the Utility to purchase these phosphorus credits for the year 2025 from Miltrim Farms, is $12,014.00. (See attached report)

I've begun in-house process control testing to address elevated suspended solids in our effluent in coordination with Troy Larsen, Strand Associates. Although the suspended solids concentrations remain well below our effluent limit, reducing the concentration is beneficial overall. We're trying to determine why the concentration is elevated and what we can do to reduce those fine solids in our effluent.

Wastewater Regulatory Requirements:

1) I have requested a copy of the WPDES draft permit, prior to the 30-day public notice. The DNR has agreed to send me a copy of the draft permit and fact sheet. As of the meeting, I have not received a copy of the draft permit, which leads me to suspect they will not reissue our permit on time. Our current permit is set to expire on September 30th, 2025. If the new permit is not reissued on time, we continue operations under our current permit.

   UPDATE 12/25 – The 3 Zinc samples collected in October 2025, were higher than the effluent limit set by the DNR; therefore, the DNR has requested that I take additional samples, for a total of 11 samples, collected 3 days apart from one another. From those 11 samples, the DNR will determine whether an effluent Zinc limit is appropriate, and whether a limit will be included in our next wastewater permit. The DNR also contacted Marathon Industrial Finishing and Aluminum Fabricated Products to inquire about their operations, but was informed that neither of these facilities generate any wastewater from their production lines. If effluent zinc concentrations remain an issue at the wastewater treatment plant, the DNR will then schedule a site visit with these industries, to verify their operations.

   UPDATE 1/26 – After submitting a total of 11 effluent zinc samples, the DNR has determined that the Village will **NOT** receive an effluent zinc limit in the next WPDES permit. Although the zinc concentrations remained higher than normal, they were not at a concentration to trigger an effluent zinc limit in our permit.

2) The 2025 Sludge Characteristics Report (Heavy Metals, Nutrients, Fecal Coliform results) and the Land Application Report (Quantity of Sludge and Land Application Locations) has been submitted to the WDNR.

Submitted by: Ken Bloom, Director of Public Works & Utilities

Marathon Public Noticed Permit Fact Sheet

General Information

Permit Number	WI-0020273-10-0
Permittee	Marathon Water & Sewer Dept, P O Box 487, Marathon City, WI 54448
Permitted Facility	Marathon Water & Sewer Department Wastewater Treatment Plant, 104 Chestnut Street, Marathon City, WI 54448
Permit Term	April 01, 2026 to March 31, 2031
Discharge Location	Outfall Location: Stormwater swale on the south bank of the Rib River, northeast of the Village of Marathon garage/yard waste site NE14/ SE1/4, Section 6, T28N R06E, Village of Marathon City, Marathon County, WI
Receiving Water	Big Rib River in Lower Rib River Watershed of Central Wisconsin River Basin in Marathon County
Stream Flow ($Q_{7,10}$)	19 cfs
Stream Classification	Warmwater sport fisheries, non-public water supply
Discharge Type	Existing, Continuous
Annual Average Design Flow	0.360 MGD
Industrial or Commercial Contributors	Marathon Cheese Corporation, Custom Meats, Inc, Marathon Cheese Truck Garage. They are not categorical industrial contributors
Plant Classification	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 Marathon Water & Sewer Wastewater Treatment Facility treats domestic wastewater from the Village of Marathon City and various wastewaters from the following industries: Marathon Cheese Corporation (processes & packages cheese-discharges process wastewater), Custom Meats, Inc (a meat processing plant- discharges process wastewater), Marathon Cheese Transportation Equipment (discharges washwater), The design flow of the facility is 0.36 million gallons per day (MGD) and had an actual annual average effluent flow of 0.223 MGD in 2025. The new Aero-Mod treatment plant was fully operational September 2023. treatment plant is an activated sludge, secondary wastewater treatment facility. The plant consists of a Huber step screen, Pista grit collector/removal system with a Wemco Hygrogritter-grit classifier, influent pumping station, Aero-Mod secondary treatment (consisting of a bio-p fermenter tank, a bio-p selector tank, and 2 trains of each of the following; 1st, 2nd, and 3rd stage aeration, and final clarifiers), biological and chemical (alum) phosphorus removal, and UV disinfection prior to discharge to the Big Rib River. Biosolids are stabilized in two aerobic digesters. Solids are allowed to gravity settle and then are pumped to a digested sludge storage tank. The digested sludge

is then mixed and aerated in the digested sludge storage tank for approximately one week, prior to thickening on an Ashbrook 0.8 M gravity belt thickener. Thickened digested sludge is then pumped to an above ground 280,000-gallon Biosolids Storage Tank, until land application each spring and fall.

Substantial Compliance Determination

Enforcement During Last Permit: A Notice of Noncompliance was issued on 5/26/2023 for a treatment facility overflow. The facility has completed all previously required actions as required in the Notice of Noncompliance.

After a desk top review of all discharge monitoring reports, CMARs, land application reports, and all compliance schedule reports for a treatment plant upgrade/replacement, phosphorus watershed project requirements, and a phosphorus schedule for continued optimization, and a site visit on 05/02/2025, the Marathon Water & Sewer DPT WW Treatment Plant has been found to be in substantial compliance with their current permit.

Compliance determination made by Nick Lindstrom on 07/11/2025.

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	0.223 MGD	Representative influent samples shall be taken after the pista grit chamber, prior to the influent pumping station.
001	Flow monitoring not reported last permit term, but it is assumed it was equal to influent flow at 0.223 MGD	Representative effluent samples shall be taken within the concrete channel downstream of the secondary clarifiers and upstream of the effluent Parshall flume and UV disinfection modules. Bacteria samples shall be taken downstream of UV disinfection modules.
002	244,000 gallons (2025)	Representative sludge samples shall be collected and monitored annually for Lists 1, 2, 3, 4 and PFAS, and once in 2027 for PCBs.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- AFTER PISTA GRIT CHAMBER

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	
CBOD5		mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	3/Week	24-Hr Flow Prop Comp	

Changes from Previous Permit:

Influent limitations and monitoring requirements were evaluated for this permit term. The following changes were made this permit term" 1) An increase in the CBOD, BOD & TSS monitoring frequency from 2/week to 3/week to match the effluent monitoring frequency.

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 to RIB RIVER

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
CBOD5	Monthly Avg	25 mg/L	3/Week	24-Hr Flow Prop Comp	
CBOD5	Weekly Avg	40 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,	Weekly Avg	45 mg/L	3/Week	24-Hr Flow	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Total				Prop Comp	
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Nitrogen, Ammonia Variable Limit		mg/L	5/Week	See Table	Look up the variable ammonia limit from the 'Variable Daily Max Ammonia Limitation' table below and report the variable limit in the Ammonia Variable Limit column on the eDMR.
Nitrogen, Ammonia (NH3-N) Total	Daily Max - Variable	mg/L	5/Week	24-Hr Flow Prop Comp	Report the daily maximum Ammonia result in the Nitrogen, Ammonia (NH3-N) Total column of the eDMR. See Ammonia Limitation Section below.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	108 mg/L	5/Week	24-Hr Flow Prop Comp	
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	108 mg/L	5/Week	24-Hr Flow Prop Comp	
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Limit effective May through September
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit effective May through September. See the E. coli Percent Limit section in the permit. Enter the result in the DMR on the last day of the month.
Phosphorus, Total	Monthly Avg	1.0 mg/L	3/Week	24-Hr Flow Prop Comp	
Phosphorus, Total	Monthly Avg	1.73 lbs/day	3/Week	Calculated	See TMDL section below and in permit.
Phosphorus, Total	Monthly Avg	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 section below and in

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
					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 section below and in permit.
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.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in permit.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in permit.
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section below. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET testing section in permit
Chronic WET		TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET testing section in permit

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: 1) Addition of flow monitoring. 2) PFOS/PFOA monitoring added once every two months and a schedule included associated with this monitoring. 3) Removal of the phosphorus multidischarger variance (MDV). The permittee has optimized and is able to meet the WIRB TMDL phosphorus limit. 4) Chronic WET testing added twice during the permit term

Explanation of Limits and Monitoring Requirements

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. After consideration, an increase in frequency for BOD5 and TSS 2/week to 3/week has been included to meet the minimum monitoring frequency and ammonia has been increased from 3/week to 5/week to meet the standard monitoring frequency.

Limits were determined for Marathon Water & Sewer Department's existing discharge to the Wisconsin River using chs. NR 102, 104, 105, 106, 207, 210, 212 and 217 of the Wisconsin Administrative Code (where applicable). For additional information on any of the limits see the October 27, 2025 memo from Ben Hartenbower to Holly Heldstab titled "Water Quality-Based Effluent Limitations for the Marathon Water and Sewer Department Wastewater Treatment Plant WPDES Permit No. WI-0020273".

MUNICIPAL EFFLUENT LIMITS – In accordance with the federal regulation 40 CFR 122.45(d), and to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7), Wis. Adm. Codes, limits in this permit are to be expressed as weekly average and monthly average limits whenever practicable.

Ammonia: Water quality-based effluent limitations were evaluated for Ammonia Nitrogen based upon water quality criteria in ch. NR 105 (as revised March 2004), including acute toxicity criteria (ATC) and chronic toxicity criteria (CTC). Effluent limitations for ammonia are calculated using the procedures in s. NR 106.32, Wis. Adm. Code and are shown in the WQBEL memo dated 10/27/2025 referenced above. In addition to weekly and monthly average ammonia, daily maximum ammonia limits that vary with effluent pH apply year-round. See table below for more information. Monitoring for pH shall occur on the same day total ammonia (NH3-N) sampling occurs.

Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L
$6.0 \leq pH \leq 6.1$	108	$7.0 < pH \leq 7.1$	66	$8.0 < pH \leq 8.1$	14
$6.1 < pH \leq 6.2$	106	$7.1 < pH \leq 7.2$	59	$8.1 < pH \leq 8.2$	11
$6.2 < pH \leq 6.3$	104	$7.2 < pH \leq 7.3$	52	$8.2 < pH \leq 8.3$	9.4
$6.3 < pH \leq 6.4$	101	$7.3 < pH \leq 7.4$	46	$8.3 < pH \leq 8.4$	7.8
$6.4 < pH \leq 6.5$	98	$7.4 < pH \leq 7.5$	40	$8.4 < pH \leq 8.5$	6.4
$6.5 < pH \leq 6.6$	94	$7.5 < pH \leq 7.6$	34	$8.5 < pH \leq 8.6$	5.3
$6.6 < pH \leq 6.7$	89	$7.6 < pH \leq 7.7$	29	$8.6 < pH \leq 8.7$	4.4
$6.7 < pH \leq 6.8$	84	$7.7 < pH \leq 7.8$	24	$8.7 < pH \leq 8.8$	3.7
$6.8 < pH \leq 6.9$	78	$7.8 < pH \leq 7.9$	20	$8.8 < pH \leq 8.9$	3.1
$6.9 < pH \leq 7.0$	72	$7.9 < pH \leq 8.0$	17	$8.9 < pH \leq 9.0$	2.6

Wisconsin River Total Maximum Daily Load (TMDL): The permitted facility is included within the Wisconsin River Basin Total Maximum Daily Load (TMDL), which was approved by EPA April 26, 2019. The TMDL establishes Waste

Load Allocations (WLAs) for point source dischargers and determines the maximum amounts of phosphorus that can be discharged and still protect water quality. The final effluent limits and monitoring expressed in the permit were derived from Site-Specific Criteria (SSC) for Lakes Petenwell, Castle Rock, and Wisconsin originally included in Appendix K of the TMDL report and approved by the U.S. Environmental Protection Agency on July 9, 2020. The permittee's approved SSC-based limits are consistent with the assumptions and requirements of the EPA-approved WLA in the TMDL, which is 393 lbs/yr for Marathon. 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 *TMDL Development and Implementation Guidance: Integrating the WPDES and Impaired Waters Program*, mass limits must be given in the permit that are consistent with the TMDL WLA and 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). Continuously discharging facilities covered by the WRB TMDL are given monthly average mass limits. The equivalent effluent concentration of 0.36 mg/L was calculated for the facility, thus, TMDL based mass limits are expressed as a monthly average. Facilities with WRB TMDL based effluent limits for phosphorus 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) 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.

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 municipal dischargers with an average flow rate less than 1 MGD, to be evaluated on a case-by-case basis to determine if monitoring is required pursuant to s. NR 106.98(2)(c), Wis. Adm. Code. The department evaluated the need for PFOS and PFOA monitoring taking into consideration the presence of potential PFOS or PFOA industrial wastes, remediation sites and other potential sources of PFOS or PFOA. Based on information available at the time the permit was drafted, indirect dischargers contributing to the collection system indicates potential for PFOS/PFOA. Therefore, monitoring once every two months is included. 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	Liquid	Fecal Coliform & Aerobic Digestion	Aerobic SOUR	Land Application	34 dry US 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						

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)**
Is a priority pollutant scan required? No 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.						

3.1 Sample Point Number: 002- SLUDGE at STORAGE TANK

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Annual	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Annual	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Annual	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Annual	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Annual	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Annual	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Annual	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Annual	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Annual	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Annual	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Annual	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Annual	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Annual	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Annual	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Annual	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Annual	Composite	
Nitrogen, Total Kjeldahl		Percent	Annual	Composite	
Nitrogen, Ammonium (NH4-N) Total		Percent	Annual	Composite	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Phosphorus, Total		Percent	Annual	Composite	
Phosphorus, Water Extractable		% of Tot P	Annual	Composite	
Potassium, Total Recoverable		Percent	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.

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

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).

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.

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4 Schedules

4.1 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.	03/31/2027
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. 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.	03/31/2028

Explanation of Schedule: PFOS/PFOA Minimization Plan Determination of Need - 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.

Other Comments

Publishing Newspaper: Wausau Daily Herald, 800 Scott Street, Wausau, WI, 54402-1286

Attachments

Water Quality Based Effluent Limits: October 27, 2025 memo from Ben Hartenbower to Holly Heldstab titled "Water Quality-Based Effluent Limitations for the Marathon Water and Sewer Department Wastewater Treatment Plant WPDES Permit No. WI-0020273".

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Holly Heldstab, Wastewater Specialist **Date:** January 20, 2026