

Thompson, Matthew A - DNR

From: Moen, Trevor J - DNR
Sent: Friday, August 6, 2021 10:50 AM
To: Lane Berg
Cc: Dave Solberg; Renee Tyler; Douglas Hoffer; Stephen Nick; Cole Cloutier; Mark Nelson; Tyler Fadness; Thielen, Geisa B - DNR; Myers, Will M - DNR; Knutson, Jason R - DNR; Baumann, Dan G - DNR; Stocks, Adrian G - DNR; Burton, Kyle - DNR; Larson, Corey D - DNR; Thompson, Matthew A - DNR; Haag, Christine T - DNR
Subject: Coverage under WPDES General Permit No. WI-B057681-05-0 - Eau Claire Waterworks
Attachments: Coverage Letter_Eau Claire Waterworks.pdf

Hello Lane,

This is notification that the Wisconsin Department of Natural Resources (Department) has granted revised coverage under the *Operation and Maintenance of Municipal Water Systems* Wisconsin Pollutant Discharge Elimination System (WPDES) General Permit No. WI-B057681-05-0 to Eau Claire Waterworks. The letter now includes authorization and coverage for the emergency well pumping/purging discharge to the absorption pond system. Attached is the WPDES permit coverage letter. The general permit and fact sheet can be downloaded from the Department website at <https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html>. Please read these documents over carefully to become familiar with the conditions and requirements.

A hard copy of this coverage letter will be mailed soon. In the meantime, this digital copy serves as your authorization under the general permit.

Please contact me if you have any questions.

Thank you and I appreciate your cooperation in protecting our natural resources.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Trevor J. Moen

Wastewater Engineer – Bureau of Water Quality
Wisconsin Department of Natural Resources
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Mobile Phone: (920) 410-5192
Trevor.Moen@Wisconsin.gov





August 6, 2021

LANE BERG
CITY OF EAU CLAIRE
1040 FOREST ST
EAU CLAIRE WI 54703

SUBJECT: Revised Coverage under WPDES General Permit No. WI-B057681-05-0
Permittee Name: City of Eau Claire
Facility Name: Eau Claire Waterworks
Facility Site Address: Eau Claire, WI
Site ID (FIN): 78469
FID: 618023010

Dear Mr. Berg:

The Wisconsin Department of Natural Resources (hereafter Department) has determined that the Eau Claire Waterworks is eligible for revised coverage and is hereby authorized under the *Operation and Maintenance of Municipal Water Systems* Wisconsin Pollutant Discharge Elimination System (WPDES) General Permit No. WI-B057681-05-0. This determination was based on review of a complete Notice of Intent submitted by you and received on August 4, 2021. Please download the permit and fact sheet from the Department website at: <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>.

The discharges from scheduled and unscheduled fire hydrant flushing of the water distribution system to waters of the state and well purging and pumping discharge to groundwater via seepage are eligible for revised coverage and hereby authorized under the *Operation and Maintenance of Municipal Water Systems WPDES General Permit No. WI-B057681-05-0* in accordance with s. NR 205.08, Wis. Adm. Code, subject to the following general permit conditions:

1. Coverage Effective Date: Coverage at the facility will become effective under this permit on **August 5, 2021** until permit termination, revoke and reissuance, or reissuance of the general permit. This permit applies only to the discharge activities and sites applicable to this general permit for the above referenced facility.
2. Regional General Permit Contact: Updated list of the general permit contacts with counties of responsibility are posted to the "Contacts" tab on the wastewater general permits webpage here: <https://dnr.wi.gov/topic/wastewater/GeneralPermits.html>.
3. Sampling: The permittee shall sample the discharge from fire hydrant flushing of the water distribution system following treatment (if necessary) at the end of pipe or prior to entering any pipe, ditch, channel, tunnel, conduit, swale, or storm sewer that will discharge to a water of the state for all the parameters listed below for Outfall 001 from Section 3.2.1 and Section 3.2.2 of the permit.

The permittee shall sample the discharge from well purging and pumping following treatment (if necessary) at the end of pipe or prior to entering any pipe, ditch, channel, tunnel, conduit, swale, or

storm sewer that will discharge to the absorption pond system for all the parameters listed below for Outfall 002 from Section 4.2.1 of the general permit.

The permittee shall take representative samples of the discharge that consists solely of the water before mixing with any other water. The permittee is only required to collect samples when there is a discharge to a water of the state; if there are no discharges within the reporting frequency the permittee shall report no discharge consistent with Sections 5.1 and 5.2.

Outfall 001 – Fire Hydrant Flushing

Monitoring Requirements and Effluent Limitations						
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Reporting Frequency	Notes
Volume		gpd	Annual	Estimated	Total Annual	
Chlorine, Total Residual	Daily Max	19 µg/L	Annual	Grab	Annual	See Section 3.2.2.1

Outfall 002 – Well Purging/Pumping

Monitoring Requirements and Effluent Limitations						
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Reporting Frequency	Notes
Flow Rate		gpd	Daily	Total Daily	Monthly	
PFOA*	-	ng/L	Biweekly	Grab	Monthly	
PFOS*	-	ng/L	Biweekly	Grab	Monthly	
PFAS*	-	ng/L	Monthly	Grab	Monthly	33 Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List.

*Due to the presence of the perfluoroalkyl and polyfluoroalkyl substances (PFAS) in the area, monitoring and sampling frequency for perfluoroalkyl and polyfluoroalkyl substances (PFAS) of the discharge from well purging and pumping to the absorption pond system was agreed upon in the Intergovernmental Agreement with the City of Eau Claire and Wisconsin Department of Natural Resources signed and dated August 5, 2021. The permittee shall sample for all the PFAS listed in and using the protocols in the department's PFAS Update-Default Reporting List for Sampling and Analysis Requirements and Expectations (current version dated March 1, 2021).

4. Volume Monitoring for Fire Hydrant Flushing: The permittee shall estimate the total annual discharge volume of all fire hydrants flushed each year. This estimate includes scheduled and unscheduled fire

hydrant flushing that may occur in a year. The permittee shall control the flow rate to minimize the erosion of the stream bank, resuspension of sediment, downstream flooding, or property damage.

5. Best Management Practices for Hydrant Flushing in Lieu of Monitoring for Total Residual Chlorine: For fire hydrant flushing under Outfall 001, the permittee may demonstrate compliance with the total residual chlorine monitoring and limitations in Section 3.2.2 if the permittee meets the requirements of Section 3.2.2.1.3. The permittee is not required to monitor for total residual chlorine for fire hydrant flushing discharges within the municipality if the permittee complies with the conditions in Section 3.2.2.1.3 of the permit.
6. Total Residual Chlorine Limitation to High Flow Streams: Under Section 3.2.2.1.1, the permittee may request upon the effective date of this general permit, a daily maximum total residual chlorine limit of 38 µg/L if the receiving water of the flushed water has an average low streamflow to average volume discharged greater than or equal to 2:1 or the discharge is to a lake or impoundment.
7. Sampling Protocol for Fire Hydrant Flushing Discharges: If opting or required to take samples for total residual chlorine, the permittee shall comply with the sampling protocol of fire hydrant flushing discharges in Section 3.2.3 of the permit. When a limitation for total residual chlorine in this permit is less than the limit of detection (LOD) for an approved test method, the permittee shall comply with the conditions of Section 3.3.2.2.2 to demonstrate compliance with the total residual chlorine limit.
8. Reporting: The permit requires all monitoring data be submitted on an electronic discharge monitoring report (eDMR) form. The eDMR form is available through the Switchboard (<https://dnr.wisconsin.gov/topic/Switchboard/>). The first report for the month of August 2021 is due by September 21, 2021. **The eDMR form shall be submitted to the department regardless of whether or not there is a discharge during any month. For days with no flow, the flow rate shall be reported as "0" on the monthly eDMR form.**

In order to access the eDMR forms, you must have or create a Wisconsin Web Access Management System (WAMS) ID and request access for each facility for which you intend to submit data. The Switchboard can be used to create a WAMS ID and register with your contact information and user roles. If you already have a WAMS ID, then you do not need to recreate one but still must request access to the facility and reports. Help with the Switchboard can be found here: <https://dnr.wisconsin.gov/topic/Switchboard/Help.html>.

9. Notification of Other Discharges: You may choose to have other water system discharges (i.e. water tower flushing or hydrostatic testing of water mains) to a water of the state covered under this general permit or allow other entities who work with municipal water systems to apply for coverage under this general permit separately. So, a contractor may apply for this general permit separately if they are performing a one-time discharge and plan on discharging to a water of state. The department recommends that you include in the contract or specifications that the contractor or consultant apply for coverage under this general permit for the discharge activity. If you do wish to be responsible for the other water system discharges to a water of the state and have them covered under this general permit, please contact the Department via the planned change requirements under Section 8.3.3 of the permit. The Department will then transmit a revised coverage letter stating that the discharge is granted coverage under this general permit with new sampling and reporting requirements for the new outfall.
10. Notification of Planned Changes: If you will change the quality of the finished water supply water which may result in discharge of different pollutants (i.e. phosphorus) being flushed, please notify the department via the planned change requirements under Section 8.3.3 of the permit. The Department

will then transmit a revised coverage letter stating that the new sampling requirements from Section 3.2.2 of the general permit.

11. Change of Authorized Representative: If you plan on changing the authorized representative contact for the facility or you want to assign a new person to be a duly authorized representative to submit specific permit documents on your behalf, please complete and submit a Delegation of Signature Authority (Form 3400-220) to the Department available at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>.
12. Compliance with Permit Conditions: You are responsible for compliance with the general permit requirements and conditions listed above and all other applicable requirements and conditions contained in the general permit. **To assure you remain in compliance and avoid any enforcement action, please read the general permit over carefully.**

Additional information regarding the Department's legal authority in this matter and your rights of appeal are shown below. Please contact me by phone: (920) 410-5192 or by email: Trevor.Moen@Wisconsin.gov if you have any questions regarding this letter.

Regards,



Trevor Moen
Wastewater Engineer
Bureau of Water Quality

EC: Permit File(s)

LEGAL AUTHORITIES AND APPEAL RIGHTS

Section 283.35(1), Wis. Stats., authorizes the Department to issue a general permit applicable to a designated area of the state authorizing discharges from specified categories or classes of point sources located within that area. Upon the request of the owner or operator of a point source, the Department shall withdraw the point source from the coverage of a general permit and issue an individual Wisconsin Pollutant Discharge Elimination System (WPDES) permit for that source in accordance with s. 283.35(2), Wis. Stats. Additionally, the Department may withdraw a point source from the coverage of a general permit and issue an individual WPDES permit if that source meets any of the factors listed in s. 283.35(3), Wis. Stats. Issuance of such an individual permit will provide for a public comment period, and potentially a public informational hearing and/or an adjudicatory hearing. In lieu of general permit withdrawal, the Department may refer any violation of a general permit to the Department of Justice for enforcement under s. 283.91, Wis. Stats., pursuant to s. 283.89, Wis. Stats. In order to remain in compliance and avoid any enforcement action, **please read your permit carefully.**

To challenge the reasonableness of or necessity for any term or condition of an issued, reissued, or modified general permit, s. 283.63, Wis. Stats., and ch. NR 203, Wis. Adm. Code, require that you file a verified petition for review with the Secretary of the Department of Natural Resources within 60 days after notice of the permit decision was issued by the Department. For other permit-related decisions, such as the decision to confer general permit coverage to your facility, that are not reviewable pursuant to s. 283.63, Wis. Stats., it may be possible for permittees or other persons to obtain an administrative review pursuant to s. 227.42, Wis. Stats., and s. NR 2.05(5), Wis. Adm. Code, or a judicial review pursuant to s. 227.52, Wis. Stats. If you choose to pursue one of these options, you should know that Wisconsin Statutes and Administrative Code establish time periods within which requests to review Department decisions must be filed.