

WPDES Low-Impact Discharge General Permit & Maple Syrup Producers

Do I need a WPDES Low-impact Discharge General Permit (GP)?



Please note: This document pertains only to the WPDES general permit for Low-impact Discharge (WI-0066575) (<https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html>). Other permits may be applicable.

The Department does not charge a permit application fee or annual fee for the Low-impact Discharge permit. Permits required by other agencies may.

If you have questions, contact your General Permit representative at <https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html>

- Contacts tab.



#1 - Am I required to have a Food Processing Plant license from DATCP (https://datcp.wi.gov/Pages/Programs_Services/FSMapleSyrup.aspx)?

No – The GP is not required at this time.

Yes – The GP may be required. *Go to question #2.*

#2 - Do I use Reverse Osmosis (RO) to produce maple syrup?

No – The GP is not required at this time.

Yes – The GP may be required. *Go to question #3.*

#3 - My RO system discharges:

- a. RO water and/or wastewater* to a surface water (lake, river, etc.) or wetland via a pipe, ditch, channel, tunnel, conduit, swale, storm sewer or similar conveyance – Contact your General Permit representative for more information and instructions. Discharges to a surface water will likely have additional requirements.
- b. Wastewater* to a septic tank and drain field, a holding tank that is pumped and hauled, or sent to a sanitary sewer. Your wastewater is regulated under a different set of rules; the GP is not required at this time.
- c. All water (RO water and wastewater*) to groundwater** – Your wastewater fits within the requirements of the GP. **Go to “How to apply for a permit”.**
- d. Wastewater* to groundwater** - Your wastewater fits within the requirements of the GP. **Go to “How to apply for a permit”.**

* For this general permit, applicable maple syrup derived wastewater is defined as the reject water that results from the wash/rinse process of the RO system and any grey water from hand and utensil washing stations. Sanitary wastewater from restrooms must be sent to a septic system, holding tank, or contained in a portable restroom that will be pumped and hauled away by a septic hauler.

** A discharge to groundwater is water allowed to infiltrate into the soil. This does not include:

- Water sent to septic tank and drain field
- Water sent to a holding tank that is pumped and hauled
- Water sent to a sanitary sewer

How to apply for a permit

An application package should be submitted at least 30 days before discharge. A letter extending coverage will be sent after a full application package is received and if the discharge meets the eligibility criteria of the permit. The package is required to include:

Notice of Intent (NOI) – The NOI and a copy of the permit can be found the General Permits tab under the Low-Impact Discharge at <https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html>.

Oil and Grease Analysis - Your lab will supply you with a sample bottle containing a small amount of acid (used as a preservative). A grab sample of the wastewater is needed. The grab sample (a volume of water taken over a short period of time) should be taken directly into the sample bottle from a location where there is the greatest mixing, such as at the end of the RO wash cycle.

Remember, it is important to follow all lab instructions.

- For groundwater discharges, one wastewater Oil and Grease (O&G) test result is required. O&G samples must be tested by a certified lab. Sample information can be found in section 3.1.1 of the permit. Due to the nature of maple syrup production, a wastewater discharge is necessary to collect a sample. An O&G sample result from a previous season may be used. If one is not available, with permission, an applicant may submit an NOI without a sample result. In those cases a sample shall be taken and result submitted at the beginning of the next production season. A list of certified labs can be found at <https://dnr.wisconsin.gov/topic/labCert/certified-lab-lists>.
- Narrative discharge observations found in section 3.1.2 are required. These parameters are based on visual observations and knowledge of the facility.
- Knowledge of Water Treatment Additives used is needed. Additives include detergents and other chemicals added to the RO system during the cleaning process. An additive worksheet 3400-213 (<https://dnr.wi.gov/files/PDF/forms/3400/3400-213.pdf>) shall be submitted for review for all surface water discharges. For groundwater discharges describe additives in the BMP Plan (see next bullet).

Additives with the active ingredient chlorine, hypochlorite, sulfuric acid, hydrochloric acid or sodium hydroxide are common and do not need to go through the review process.

- A Best Management Practice (BMP) Plan that identifies potential discharges of pollutants to the environment including the impacts of erosion and sediment control is required. Section 6.6 of the permit identifies what should be included in the plan. A BMP template can be found on the General Permits tab under the Low-Impact Discharge at <https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html>.
- Include a site map that shows the facility location and the location of each discharge point.

Once you receive coverage you are required to

- Operate under the permit requirements
- Follow your BMP Plan
- Maintain a log of the narrative discharge requirements

Coverage continues through the entire permit term.

You do not need to reapply each production season and you will be notified when the permit is reissued. At that time, you will need to reapply and resample (expected in 2025).

This WPDES general permit is effective for 5-years (March 1, 2020 to February 28, 2025). Difficulties during the permit process may cause a delay in the next reissuance. To compensate, section 8.2.4 of the permit states a permittee is covered under the expired permit until a new permit is reissued. The length of coverage for an individual permittee can be difficult to track, current permit holders will be notified by the department when and how to reapply.

