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March 14, 2017

Ms. Emily James  
Wisconsin Department of Natural Resources  
South Central Region  
3911 Fish Hatchery Road  
Fitchburg, WI 53711

Subject: WPDES Discharge Monitoring Report – Request for Change to Groundwater  
Extraction and Treatment System Monitoring Frequency, Madison Kipp  
Corporation, Madison, Wisconsin

Dear Ms. James:

Madison-Kipp Corporation (MKC) is currently operating a groundwater extraction and treatment system (GETS) to remediate groundwater contaminated with volatile organic compounds, predominately tetrachloroethene (PCE). On January 12, 2015, MKC was issued a Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0046566-06 for Discharge of Contaminated Groundwater from Remediation Action Operations (Attachment A). As of January 2016, the GETS has been in continuous operation for approximately nineteen (19) months with system start-up being completed during the first six months of operation, and regular operation beginning in approximately January 2016. As part of the WPDES, monthly samples are collected from the effluent of the treatment system for volatile organic compounds (VOCs), oil and grease, biological oxygen demand, select polycyclic aromatic hydrocarbons (PAHs), total suspended solids (TSS), and chloride. A discharge monitoring report, including results of the sampling, is submitted monthly to the WDNR by the 15<sup>th</sup> of the following month.

The MKC WPDES permit was issued under the WDNR General Permit to Discharge Under Wisconsin Pollutant Discharge Elimination System for Contaminated Groundwater for Remedial Action Operations (Attachment B). Per Section 2.5 of the General Permit, the frequency of monitoring can be reduced from monthly to quarterly if select conditions are met. Specifically, Section 2.5 states: “monitoring parameters shall be tested at a weekly frequency during the initial six weeks of discharge and thereafter at a monthly frequency, except as follows: after the discharge has been monitored for at least one year, at least 16 sample results have been generated, no analysis results have exceeded 60% of any permit discharge limitation, and there is little chance that a high pollutant level may abruptly pass

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through the treatment unit, the Department may approve, in the discharge management plan, a quarterly monitoring frequency.”

MKC has monitored the discharge from the GETS for over one year, at least 16 samples have been collected, and select parameters have been reported at concentrations less than 60% of the permit discharge limitations during the past 16 monitoring events. In addition, results from the effluent monitoring have been consistent and indicate that during normal operation, the GETS is capable of treating groundwater and discharging below the permit limitations.

TRC Environmental Corporation (TRC) on behalf MKC, created a summary table which includes the effluent results from each monitoring event since startup of the system (Attachment C). In the table, each constituent monitored is compared to the established permit limitation and a percent of was calculated. Overall effluent concentration indicate that oil and grease, biological oxygen demand, total suspended solids (TSS), and chloride have been detected below 60% of the permit limitation over the last sixteen samples collected.

In addition, PAHs have also been detected below 60% of the permit limitation since start up with the exception of one sample collected on August 13, 2015. Phenanthrene was detected in the effluent at a concentration of 0.081 µg/L which was found to be 81 percent of the permit limit. However, the detection was laboratory flagged as phenanthrene was reported in the blank and was estimated as the concentration was between the method detection limit and reporting limit. Since August 13, 2015 a total of eighteen (18) additional samples have been collected and constituents within the PAH group 10 were reported as less than the detection limit.

The effluent concentrations for oil and grease, biological oxygen demand, select polycyclic aromatic hydrocarbons (PAHs), total suspended solids (TSS), and chloride have been less than 60% of the permit limit over the last 16 rounds of monitoring and per General Permit Section 2.5, sampling frequency for these parameter can be reduced to quarterly. Therefore, TRC proposes to reduce monitoring of these constituents to quarterly. VOCs and potassium permanganate neutralization (visual inspection) will continue to be monitored on a monthly basis per the MKC WPDES permit requirements.

Based on the review of the monitoring that has been completed for the GETS system, TRC on behalf of MKC requests concurrence to modify the GETS discharge monitoring program



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as described in the previous paragraph. Table 2 included in Attachment D also describes the modified monitoring plan.

If you have any questions or comments related to this request, please contact Andrew Stehn at 608-826-3665 or at [astehn@trcsolutions.com](mailto:astehn@trcsolutions.com). We appreciate your assistance and look forward to discussing this modification as needed.

Sincerely,

TRC Environmental Corporation



Andrew Stehn  
Project Engineer



Katherine Vater, P.E.  
Project Manger

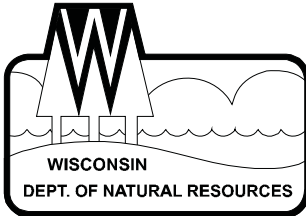
- Attachments:
- A. WPDES Permit WI-0046566-06
  - B. WDNR General Permit to Discharge Under Wisconsin Pollutant Discharge Elimination System for Contaminated Groundwater for Remedial Action Operations
  - C. GETS WPDES Compliance Sample Results
  - D. Modified GETS Monitoring Plan

cc: Mark Sheppard – MKC (electronic)  
Mike Schmoller – WDNR (electronic)  
Wendy Weihemuller – WDNR (electronic)  
George Parrino – Madison Department of Health (electronic)



**Attachment A**

**WPDES Permit WI-0046566-06**



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor  
Cathy Stepp, Secretary  
Mark Aquino, Regional Director

South Central Region Headquarters  
3911 Fish Hatchery Road  
Fitchburg, WI 53711-5397  
Telephone (608) 275-3266  
FAX (608) 275-3338  
TTY Access via relay - 711

January 12, 2015

Alina Satkoski  
Environmental and Safety Coordinator  
Madison Kipp Corporation  
P.O. Box 8043  
Madison, WI 53704

**SUBJECT: Coverage under General Permit WI-0046566-06, Discharge of Contaminated Groundwater from Remedial Action Operations**

Dear Ms. Satkoski:

The Department has reviewed your application for authorization to discharge treated contaminated groundwater from a remediation project at 201 Waubesa Street, Madison, WI. The contamination is the result of a release of contaminants due to historical and ongoing operations at Madison Kipp Corporation (WDNR BRRTS #02-13-001569).

Your proposed discharge is eligible for coverage under the general Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0046566-06 for Discharge of Contaminated Groundwater from Remedial Action Operations. You are responsible for compliance with the conditions contained in this permit. The permit and fact sheet should be downloaded from the DNR website at:  
<http://dnr.wi.gov/topic/wastewater/generalpermits.html>.

Discharges under this permit are required to be consistent with a discharge management plan that has been approved by the Department. Your application submitted will be considered as the required discharge management plan. The analysis results would indicate that monitoring is required for all parameters listed in the permit on page 9. All of your contaminated wastewater discharges must be done according to the terms and conditions of the permit, specifically sections 1, 2, 4 and 8.

Treatment of contaminated groundwater will be provided by Madison Kipp Corporation. One extraction well will pump groundwater at 45 gpm into a 2,000 gallon holding tank. Water will then be mixed in a 550 gal mixing tank with Hecla 1 anti-scalant at 30-60 ppm, approximately 2-4 gal/day. The water will then be pumped through an air stripper for treatment, followed by discharge into storm sewer inlet AS5940-049 at 201 Waubesa Street. Treated water will discharge into Stark Weather Creek which flows into Lake Monona. Any significant system changes will require Department approval. **Note: It is the responsibility of the permittee to obtain any and all necessary permissions, permits, and approvals from other state and local agencies prior to initiating operations.**

Permit Coverage begins on January 12, 2015. Records of effluent volume and chemical monitoring data shall be submitted on discharge monitoring report (DMR) forms on a monthly basis until completion of project. All sample results must be reported on the DMR. Reports are due the 15th day of the month following the completion of the reporting period or within one month following the completion of the project. The DMR forms

will be sent to Nicholas Bertolas, as specified in the application. The owner must sign the DMRs. DMRs should be sent to the address indicated on the DMR.

Post treatment samples must meet the limits (reproduced below) listed in Part 4, page 9 of WPDES permit WI-0045655-06. Sampling for all parameters except flow is required prior to treatment and after treatment prior to discharge to Stark Weather Creek.

<b>DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS</b> (1,2,4,8)				
<b>PARAMETER</b>	<b>DISCHARGE LIMIT</b>	<b>SAMPLE FREQUENCY</b>	<b>SAMPLE TYPE</b>	<b>NOTES</b>
Flow	gallons per day	Daily	Total daily	
Bromoform	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Carbon Tetrachloride	150 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Chloroform	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Dichlorobromomethane	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,2-Dichloroethane	180 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1-Dichloroethylene	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Methyl Bromide	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Methyl Chloride	120 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1,2,2-Tetrachloroethane	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Tetrachloroethylene	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1,2-Trichloroethane	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
1,1,1-Trichloroethane	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Trichloroethylene	50 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	
Vinyl Chloride	10 ug/L Monthly Average	Daily for 6 weeks/Monthly	Grab	

Suspended Solids, Total	40 mg/L Daily Maximum	Daily for 6 weeks/Monthly	Grab	
Cis-1,2-Dichloroethene		Daily for 6 weeks/Monthly	Grab	
Trans-1,2-Dichloroethene		Daily for 6 weeks/Monthly	Grab	

- 1) Nicholas Bertolas, Wastewater Specialist (608) 275-3281, shall be notified:
  - Two (2) weeks prior to the startup of any discharge;
  - Within 24 hours if post-treatment concentrations of these parameters meet or exceed the discharge limits;
  - If the flow is anticipated to increase above 70 gpm;
  - If free product is discovered;
  - One (1) week prior to usage of any cleaning solutions or additives.
- 2) The discharge shall be sampled one time per discharge event for the remainder of the project. The first set of samples must be taken within 24 hours of system start up.
- 3) All sample results must be reported on the DMR; this includes samples that exceed the frequency required by the permit and this letter.

Note: The monitoring parameters shall be tested at a weekly frequency during the initial six weeks of discharge and thereafter at a monthly frequency.

- 4) Sampling and analysis for all parameters shall be **unfiltered**.
- 5) Sampling for suspended solids must be conducted any time a cleaning procedure is conducted. Sampling and analysis is not required during normal operating time.
- 6) A grab sample shall be analyzed for pH whenever treatment unit cleaning solutions are discharged, or when other activities could significantly change the pH of the water.
- 8) The discharge limits are set to protect both surface water and groundwater quality since the discharge is to surface water that may have seepage to groundwater. The most restrictive limits will apply.

**\*Special Note: The site of this remediation project and discharge is located within 1,000 feet of 3 open and ongoing R&R contamination sites as well as within 1,500 feet of 7 closed sites. Special precaution should be taken in the undertaking of this project.**

**\*\*Special Note: The proposed discharge is to a 303d-listed impaired water. Be familiar with monitoring associated with impaired waters – see permit section 2.14 or: <http://dnr.wi.gov/topic/impairedwaters/>**

Limits based on groundwater quality protection are set at the preventive action limits in ch. NR 140, Wis. Adm. Code. These limits are based on substances reported to be in the discharge, but may not necessarily include all substances of public health or welfare concern, which are in the discharge. However, nothing in this permit allows the permittee to discharge any substance in a concentration that would cause groundwater standards in Ch. NR 140 to be exceeded.

If you have any questions about permit requirements or the contents of this letter, please feel free to contact me.

Sincerely,

Nicholas Bertolas

Wastewater Specialist – Bureau of Water Quality  
Wisconsin Department of Natural Resources  
3911 Fish Hatchery Road, Fitchburg, WI 53711  
Phone: (608) 275-3281  
Nicholas.Bertolas@wisconsin.gov

cc: Permit File – Region and Central Office  
Alan Hopfensperger, WDNR Hydrogeologist (via email)  
Jeff Brauer, WDNR Wastewater Engineer (via email)  
Michael Schmoller, WDNR R&R Project Manager (via email)  
Mike Sorge, WDNR Water Resources Management Specialist (via email)  
Jennine Trask, Certified Project Manager – Arcadis (via email)  
George Parrino, Madison and Dane County Public Health (via email)

#### LEGAL AUTHORITIES AND APPEAL RIGHTS

Section 283.35, Wisconsin Statutes, authorizes the Department to issue general permits for discharges from categories or classes of point sources. If a permittee believes coverage of a facility under a general WPDES permit is not appropriate, the permittee may apply for issuance of an individual WPDES permit pursuant to section 283.35(2) and may petition the Department for withdrawal of coverage under the general permit. The individual permit application should indicate which site specific factors would justify alternate WPDES limits for the operation. Issuance of such a site specific WPDES permit will provide for a 30 day public comment period, and potentially a public informational hearing and/or an adjudicatory hearing. The Department may withdraw a facility from coverage under a general permit if it is determined that a discharge is a significant contributor of pollutants to waters of Wisconsin, or in certain other cases set out in s. 283.35, Stats. In lieu of general permit withdrawal, the Department may refer any violation of this permit to the Department of Justice for enforcement under s. 283.89, Stats. In order to avoid any enforcement action, **please read the WPDES permit carefully and comply with the permit requirements.**

If you believe you have a right to challenge the Department decision to cover this facility with a WPDES general permit, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. To request a contested case hearing pursuant to section 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. Such a petition should identify pollutant(s) that are believed to be not appropriately regulated by the general permit for the specific site. All requests for contested case hearings must be made in accordance with section NR 2.05(5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the time period for filing a petition for judicial review.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. A petition for judicial review must name the Department of Natural Resources as the respondent.





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**FOOTNOTES:**

- (1) Total BETX is the sum of the benzene, ethylbenzene, toluene and xylene concentrations.
- (2) PAH group of 10 (Polynuclear Aromatic Hydrocarbons) include the sum of the following individual compounds: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene
- (3) Madison Kipp/Arcadis will conduct visual monitoring for this compound.

**DIRECTIONS:**

- ☞ For "Outfall # and Description" enter the number of the outfall you are reporting (001 or 002, etc.)
- ☞ Monitoring for a given parameter depends on if the discharge is to surface water or groundwater.
- ☞ The value entered must be the highest value of all samples analyzed for that day.
- ☞ Print additional DMRs as necessary for monthly reporting.

RETURN REPORT BY: **February 15, of the year following completion of monitoring**

RETURN TO: **ATTN: Nicholas Bertolas**  
**Department of Natural Resources**  
**3911 Fish Hatchery Rd.**  
**Fitchburg, WI 53711**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment, (40 CFR 122.5). I also certify that the values being submitted are the actual values found in the samples; no values have been modified or changed in any manner. Wherever I believe a value being reported is inaccurate, I have added an explanation indicating the reasons why the value is inaccurate.

\_\_\_\_\_  
Signature of Person Completing Form

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Principal Exec. or Authorized Agent

\_\_\_\_\_  
Date

**Attachment B**

**WDNR General Permit to Discharge  
Under Wisconsin Pollutant Discharge Elimination System  
for Contaminated Groundwater for Remedial Action Operations**



**STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES**

**GENERAL PERMIT TO DISCHARGE UNDER THE  
WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of Chapter 283, Wis. Statutes, a facility or operation that meets the applicability criteria listed in Part 1 of this General Permit and generates

**Contaminated Groundwater from Remedial Action Operations**

is permitted to discharge remedial action wastewater to surface or ground water resources of Wisconsin in accordance with the effluent limitations, monitoring requirements and other conditions set forth in this permit.

State of Wisconsin Department of Natural Resources  
For the Secretary

By Thomas J. Meyer  
For Susan Sylvester, Director  
Bureau of Water Quality  
Division of Water

July 31, 2012  
Date Permit Signed/Issued

**PERMIT EFFECTIVE DATE - August 1, 2012**

**EXPIRATION DATE - June 30, 2017**

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## 1. APPLICABILITY CRITERIA

### 1.1. Activities Covered

This permit applies to discharges of treated wastewater from contaminant removal and remediation projects to surface water resources or groundwater of Wisconsin where the Department determines that the discharge complies with the provisions of ch. 283, Wisconsin Statutes. Discharges that lower the water quality of exceptional resource waters as defined in s. NR 102.11, Wisconsin Administrative Code are allowed only in cases where the discharge meets the antidegradation requirements of ch. NR 207, Wis. Adm. Code, such as preventing or correcting public health problem or a groundwater contamination situation.

### 1.2. Activities Not Covered

This permit does not authorize discharges that meet any of the following conditions:

- discharges directly to an outstanding resource water as defined in s. NR 102.10, Wis. Adm. Code, or discharges that would lower the water quality of downstream outstanding resource waters;
- discharges to waters classified as a public water supply in ch. NR 104, Wis. Adm. Code;
- discharges to a wetland and the Department has determined that the discharge of pollutants will not meet the requirements of ch. NR 103, Wis. Adm. Code;
- discharges containing pollutants (acrylonitrile is an example) that are not limited by this permit and the discharge of these pollutants have a reasonable potential to exceed surface water quality standards and limitations calculated in accordance with chs. NR 102, NR 105, NR 106, and NR 207, Wis. Adm. Code, or violate groundwater standards contained in ch. NR 140, Wis. Adm. Code;

## 2. REQUIREMENTS FOR ALL DISCHARGES

### 2.1. Determination of Coverage

All facilities covered under this permit must have received a letter of determination from the Department authorizing the remedial action operation to discharge treated wastewater under this general permit (or its previous versions).

### 2.2. Treatment of Contaminated Wastewater

All discharges of contaminated groundwater, including pump test wastewaters, shall be treated for pollutant removal prior to discharge. The level of treatment shall be equivalent to Best Available Treatment Economically Achievable as defined in section 301(b)(2) of the Clean Water Act and s. 283.03(2)(b), Wis. Stats. The treatment units shall be adequately sized, designed, and operated to remove contaminants identified through sampling and characterization of the contaminated groundwater. Section 281.41, Wis. Stats, requires Department approval of plans and specifications for wastewater treatment systems. When treatment units for contaminated groundwater are supplier furnished package units, a minimum plan submittal is a diagram, a summary of the design basis, and unit sizing calculations.

### 2.3. Discharge Management Plan

All discharges under this permit shall be consistent with a discharge management plan that has been approved by the Department. The Department may exempt a facility from monitoring contaminants regulated by this permit, if the permittee can demonstrate that the contaminants will not be present in the effluent discharge. The discharge management plan shall also include monitoring that confirms: (1) compliance with Best Available Treatment as specified in part 2.2, above, (2) that there is no reasonable potential to exceed surface water

quality standards listed in Ch. NR 105, Wis. Adm. Code, tables 1 through 9, for pollutants not directly limited by this permit, or (3) that there is no reasonable potential to exceed groundwater quality standards listed in Ch. NR 140, Wis. Adm. Code, tables 1 through 3, for pollutants not directly limited by this permit. The Department may also approve a management plan that specifies alternate monthly average effluent limitations (up to a level equivalent to a NR 140, Wis. Adm. Code, Enforcement Standard) for discharges to groundwater.

## **2.4. Analysis Test Methods**

The wastewater sampling and testing methods shall be conducted as specified in Part 8.9 of this permit, unless the permittee requests and the Department approves (in writing) the use of an alternate, equivalent test method due to factors specific to the discharge site.

## **2.5. Monitoring Frequency**

The permittee shall record the total daily volume of wastewater discharged under this permit on each day there is a discharge. Unless otherwise specified in this permit (as in parts 6 and 7), the monitoring parameters shall be tested at a weekly frequency during the initial six weeks of discharge and thereafter at a monthly frequency, except as follows: after the discharge has been monitored for at least one year, at least 16 sample results have been generated, no analysis results have exceeded 60% of any permit discharge limitation, and there is little chance that a high pollutant level may abruptly pass through the treatment unit, the Department may approve, in the discharge management plan, a quarterly monitoring frequency.

## **2.6. Exceedance Reporting**

The permittee shall report exceedance of any limit for each parameter regardless of monitoring frequency (refer to standard requirement 8.4 of this permit for noncompliance reporting requirements). For example, monthly, weekly, and daily limits shall be met even when only one sample is collected per month. The permittee may monitor more frequently than required for any parameter.

## **2.7. Reporting Monitoring Results**

Monitoring results obtained during the specified reporting period shall be summarized and reported on a Department Wastewater Discharge Monitoring Report (DMR) or other equivalent form or reporting system approved by the Department (including the electronic Discharge Monitoring Report (eDMR) system when available). Monitoring results shall be reported on a monthly basis unless the Department approves a quarterly or annual reporting period in the discharge management plan. The monitoring report is to be returned to the Department no later than the 15<sup>th</sup> day of the month following the end of the reporting period or by the submittal date indicated on the form, whichever is later. When submitting a Department paper DMR form, the original (and one copy if specified on the form) shall be submitted to the return address printed on the form.

## **2.8. Chlorine for Bacterial Control**

Chlorine may be used to control the growth of micro-organisms in the treatment system. The Department recommends a chlorination system that cleans and chlorinates the treatment unit when it is out of service, and then captures the cleaning wastewater for acceptable offsite disposal, such as a sanitary sewer. Alternatively, the cleaning wastewater may be treated for removal of suspended solids and other pollutants, and then discharged under this permit. In all cases, the discharge of chlorinated water to surface waters under this permit shall not contain detectable amounts of Total Residual Chlorine as determined by using Standard Methods #408B, D or E (DPD titration or colorimetric), EPA method 330.3, or by using an ion specific electrode approved in Ch. NR 219, Wis. Adm. Code. Biocides, other than chlorine, may not be discharged under this permit.

## **2.9. Visible Foam and Floating Solids**

There shall be no discharge of floating solids or visible foam to surface waters in other than trace amounts.

## 2.10. pH Limits and Monitoring for Discharges to Surface Waters

The pH of all surface water discharges authorized by this permit shall be maintained within the range of 6.0 to 9.0 standard units. A grab sample shall be analyzed whenever treatment unit cleaning solutions are discharged or when other activities could significantly change the pH of the water.

## 2.11. Water Treatment Additives

The discharge of water treatment additives is prohibited under this permit unless the water treatment additive use is approved, in writing, by the Department. Water treatment additive discharge concentrations shall be below the level of concern for impacts to aquatic life and human health as specified in s. NR 106.10, Wis. Adm. Code, for surface water discharges, or for impacts to human health as specified in ch. NR 140, Wis. Adm. Code, for discharges to groundwater. The permittee shall maintain records of the monthly water treatment additive use including the additive name, manufacturer, and daily maximum amount used.

The permittee shall provide the following information regarding water treatment additives to receive Department approval:

- the commercial name of the additive and Material Safety Data Sheet (MSDS);
- the amount or concentration to be used;
- the proposed frequency of use;
- the anticipated discharge concentration; and
- Aquatic toxicity information, consisting of at least one 48-hour LC<sub>50</sub> or EC<sub>50</sub> value for Daphnia magna or Ceriodaphnia dubia, and at least one 96-hour LC<sub>50</sub> or EC<sub>50</sub> value for either fathead minnow, rainbow trout, or bluegill. The Department will only consider toxicity information on the whole product, not just the active ingredient or component of a product

## 2.12. Inspection and Maintenance

Separated contaminants, and solids if present, shall be removed on a periodic basis to maintain the treatment capacity and efficiency of the system. The water discharge side of the treatment unit shall be maintained clean and there shall be no contaminant sheen or scum on the effluent side of the equipment.

## 2.13. Prevent Overflow

Dikes or berms constructed as part of a treatment facility shall be designed to have no above ground leakage through or over the outer surface of such dikes or berms.

## 2.14. Impaired Waters & TMDL Requirements for Surface Water Discharges

**2.14.1 Report Discharge to an Impaired Surface Water.** The permittee shall report, on the annual discharge monitoring report, that the facility has a detectable pollutant of concern discharge to an impaired surface water or a surface water with a State and EPA approved Total Daily Maximum Load (TMDL) allocation.

Note: The section 303(d) list of Wisconsin impaired surface water bodies may be obtained by contacting the Department or by searching for the section 303(d) list on the Department's Internet site. The Department updates the section 303(d) list approximately every two years. The updated list is effective upon approval by EPA. The current link to the section 303(d) list is:

<http://dnr.wi.gov/org/water/wm/wqs/303d/>.

**2.14.3 TMDL Compliance.** Facilities discharging a pollutant of concern under this permit shall meet the requirements of a State and Federally Approved Total Daily Maximum Load (TMDL) allocation for their



discharge location that is in effect on the start date of this permit. Existing remedial action discharges covered under this permit are expected to be consistent with the baseline allocation granted to Wisconsin General Permit discharges in all State and EPA approved TMDLs in effect on the start date of this permit.

Note: A “Pollutant(s) of concern” means a pollutant that is contributing to the impairment of a water body. State and Federal Approved TMDLs can be identified by contacting the Department, or by searching for the State and Federal Approved TMDL list on the Department Internet site. The current link to identify the list of State and Federal Approved Final TMDLs is:

<http://dnr.wi.gov/org/water/wm/wqs/303d/TMDL.html>

**2.14.4 New or Increased pollutant discharge to a 303(d) listed impaired surface water.** A permittee may not establish a new wastewater discharge of a pollutant of concern to an impaired water body or significantly increase an existing discharge of a pollutant of concern to an impaired water body unless the new or increased discharge does not contribute to the receiving water impairment, or the discharge is consistent with a State and Federal approved total maximum daily load (TMDL) allocation for the impaired water body. Any new or significantly increased pollutant of concern discharge to an impaired surface water authorized under this general permit shall be consistent with the baseline load allocation for general permittees within the basin.

Note: Wisconsin TMDL allocations are primarily being developed for sediment and phosphorus which are normally very low or non-detectable in remedial action wastewater discharges.

### 3. ADDITIONAL REQUIREMENTS FOR DISCHARGE TO SURFACE WATERS FROM REMEDIATION OF PETROLEUM PRODUCT CONTAMINATION

Discharge to surface waters of remedial action wastewater shall meet the requirements in this section including the effluent limitations and monitoring requirements specified in Table 3.1. Monitoring during a specified sampling period is required when remedial action wastewater is discharged to surface water resources anytime during that period. Samples representative of the wastewater effluent shall be taken at each outfall following treatment and prior to discharge. Discharge to surface waters includes discharge to storm sewers or drainage channels that convey wastewater to creeks, wetlands, streams, rivers and lakes.

#### 3.1. Effluent Limits and Monitoring Requirements

Parameter	Effluent Limitations	Sample Frequency	Sample Type	Notes
Flow	gallons per day	Daily	Total daily	
Benzene	50 ug/L Monthly Average	See Part 2.5	Grab	
Total BETX	750 ug/L Daily Maximum	See Part 2.5	Grab	See Part 3.4
Methyl Tert Butyl Ether	—	See Part 2.5	Grab	
Polynuclear Aromatic Hydrocarbons	0.1 ug/L Monthly Avg.	See Part 2.5	Grab	See Part 3.5
Benzo(a)pyrene	0.1 ug/L Monthly Avg.	See Part 2.5	Grab	See Part 3.6
Naphthalene	70 ug/L Monthly Avg.	See Part 2.5	Grab	
Total Recoverable Lead	50 ug/L Daily Maximum	See Part 2.5	Composite	
Total Recoverable Lead	ug/L Weekly Average Limit per Part 3.9 calculation	See Part 2.5	Composite	See Part 3.9
Total Recoverable Lead	Lbs/day Weekly Ave Limit per Part 3.9 calculation	See Part 2.5	Composite	See Part 3.9
Oil and Grease	10 mg/L Daily Maximum	See Part 2.5	Grab	
Suspended Solids, Total	40 mg/L Daily Maximum	See Part 2.5	Grab	

#### 3.2. Wastewater Testing/Discharge Management Plan

The permittee shall monitor the discharge for all of the compounds listed in the table 3.1 unless the Department approves a discharge management plan (see part 2.3) with a reduced list contaminants for monitoring.

#### 3.3. Sample

A grab sample means a single sample taken at one moment of time or a combination of several smaller samples of equal volume taken in less than a two minute period.

#### 3.4. Total BETX

Total BETX shall include the summation of the following compounds: benzene, ethylbenzene, toluene and total xylenes.

### 3.5. Polynuclear Aromatic Hydrocarbons Group

The polynuclear aromatic hydrocarbons (PAH) group regulated by this permit shall include a summation of the following individual compounds: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene. Compliance with the monthly average PAH group limit can be demonstrated by using EPA method 610 or 8310 HPLC and reporting no detect of any of these PAH compounds, or by reporting the sum of the PAH group detected amounts equal to or less than 0.1 ug/L.

### 3.6. Benzo(a)pyrene

Compliance with the monthly average Benzo(a)pyrene limit can be demonstrated by using EPA method 610 or 8310 HPLC and reporting no detect, or by reporting a detected amount equal to or less than 0.1 ug/L.

### 3.7. Composite Lead Sample

A composite lead sample means a combination of individual samples of equal volume taken at approximately equal intervals (not exceeding one hour) over a three hour time period of normal operation of the facility.

### 3.8. Total Recoverable Lead

Compliance with lead limits listed in this permit may be demonstrated by testing for total recoverable lead or total lead.

### 3.9. Weekly Average Lead Limitations

The weekly average (chronic) lead concentration and mass limits are a function of the receiving water hardness as specified in s. NR 105.06, table 6, Wis. Adm. Code, the effluent average day design flow ( $Q_e$ ), the receiving water background lead concentration ( $C_s$ ), and the receiving water design flow ( $Q_s$ ) as specified in s. NR 106.06(3), Wis. Adm. Code. To calculate the weekly average lead limits for this permit, the WQC variable in the s. NR 106.06(3), Wis. Adm. Code formula needs to be adjusted to reflect 1/3 of the remaining assimilative capacity to prevent significant lowering of water quality as specified in s. NR 207.04(2)(c)2, Wis. Adm. Code. The weekly average lead permit limits for discharges to surface waters are calculated by using the following formulas:

$$\text{Weekly Average Lead Limit (ug/L)} = [(C_s + 1/3 \{ \underline{CTC} - C_s \}) * (Q_s + Q_e) - (Q_s C_s)] \div Q_e$$

Where:  $\underline{CTC} = e$  to the exponent  $(0.9662 * \ln(\text{receiving water hardness mg/L}) - 1.1171)$ , and  $Q_s = 1/4 \text{Stream } Q_{7,10}$  or alternate stream flow as specified in NR 106.06(3),

$$\text{Weekly Average Lead Limit (lbs/day)} = \text{Weekly average mg/L concentration limit} * Q_e \text{ million gallons per day} * 8.34 \text{ lbs/gallon unit conversion factor.}$$

### 3.10. Total Suspended Solids

Monitoring for Total Suspended Solids is only required at sites where there is a discharge of equipment cleaning wastewaters, or when groundwater is pumped from open pits or trenches.

#### 4. ADDITIONAL REQUIREMENTS FOR DISCHARGES TO SURFACE WATERS FROM REMEDIATION OF VOLATILE ORGANIC CONTAMINANTS

Discharge of remedial action wastewater to surface water resources shall meet the requirements in this section including the effluent limitations and monitoring requirements specified in Table 4.1. Monitoring during a specified sampling period is required when remedial action wastewater is discharged to surface water resources anytime during that period. Samples representative of the wastewater effluent discharge shall be taken at each outfall following treatment and prior to discharge. Discharge to surface water resources includes discharge to storm sewers and drainage channels that convey wastewater to creeks, wetlands, streams, rivers and lakes.

##### 4.1. Effluent Limits and Monitoring Requirements

Parameter	Effluent Limitations	Sample Frequency	Sample Type	Notes
Flow	gallons per day	Daily	Total daily	
Bromoform	120 ug/L Monthly Average	See Part 2.5	Grab	
Carbon Tetrachloride	150 ug/L Monthly Average	See Part 2.5	Grab	
Chloroform	120 ug/L Monthly Average	See Part 2.5	Grab	
Dichlorobromomethane	120 ug/L Monthly Average	See Part 2.5	Grab	
1,2-Dichloroethane	180 ug/L Monthly Average	See Part 2.5	Grab	
1,1-Dichloroethylene	50 ug/L Monthly Average	See Part 2.5	Grab	
Methyl Bromide	120 ug/L Monthly Average	See Part 2.5	Grab	
Methyl Chloride	120 ug/L Monthly Average	See Part 2.5	Grab	
1,1,2,2-Tetrachloroethane	50 ug/L Monthly Average	See Part 2.5	Grab	
Tetrachloroethylene	50 ug/L Monthly Average	See Part 2.5	Grab	
1,1,2-Trichloroethane	50 ug/L Monthly Average	See Part 2.5	Grab	
1,1,1-Trichloroethane	50 ug/L Monthly Average	See Part 2.5	Grab	
Trichloroethylene	50 ug/L Monthly Average	See Part 2.5	Grab	
Vinyl Chloride	10 ug/L Monthly Average	See Part 2.5	Grab	
Suspended Solids, Total	40 mg/L Daily Maximum	See Part 2.5	Grab	

##### 4.2. Wastewater Testing/Discharge Management Plan

The permittee shall monitor the discharge for all of the compounds listed in the table 4.1 unless the Department approves a discharge management plan (see part 2.3) with a reduced list of contaminants for monitoring.

**4.3. Grab Sample** - A grab sample means a single sample taken at one moment of time.

**4.4. Total Suspended Solids** - Monitoring for Total Suspended Solids is only required when equipment cleaning wastewater is discharged or when groundwater is pumped from open pits or trenches.

## **5. ADDITIONAL REQUIREMENTS FOR WASTEWATER INFILTRATION DISCHARGES TO GROUNDWATER NOT IMPACTED BY REMEDIATION PROJECT CONTAMINANTS**

Discharge of remedial action wastewater through an infiltration system to groundwater shall meet the requirements in this section including the effluent limitations and monitoring requirements specified below. Monitoring during a specified sampling period is required when remedial action wastewater is discharged to an infiltration system anytime during the sampling period. Unfiltered samples representative of the wastewater effluent shall be taken at each outfall following treatment and prior to discharge to the infiltration system. A discharge to groundwater in Wisconsin includes wastewater infiltration systems, such as irrigation, drain fields, ditches, seepage ponds, etc. that may impact water beneath the ground surface.

### **5.1. Effluent Limitation for Discharges to Groundwater**

Best available wastewater treatment technology (see part 2.2) is required to minimize the level of substances in the groundwater and to prevent exceedance of the groundwater preventive action limits (PAL) contained in tables 1 through 3 of Chapter NR 140, Wisconsin Administrative Code, to the extent that it is technically and economically feasible. Therefore, this permit establishes monthly average effluent limitations, that are equivalent to NR 140, Wis. Adm. Code, Preventive Action Limits. As specified in part 5.3, there may be cases when the permittee can demonstrate, and the Department approves, that alternate effluent limitations be established up to a level equivalent to the ch. NR 140 Enforcement Standard.

### **5.2. Where to Sample**

Compliance with the limitations established by this permit shall be demonstrated by sampling wastewater treatment system effluent prior to infiltration. However, in cases where alternate effluent limitations are established consistent with part 5.3, the Department may also approve, in a discharge management plan, monitoring of groundwater wells downgradient of the infiltration system to demonstrate compliance with NR 140 groundwater quality standards.

### **5.3. Wastewater Testing/Discharge Management Plan**

The permittee shall monitor the discharge for all of the compounds listed in part 5.5 and 5.6, unless the Department approves a discharge management plan (see part 2.3) with a reduced list of contaminants for monitoring. The Department may also approve, in the management plan, alternate monthly average effluent limits for discharges to groundwater. Alternate effluent limits shall be justified by demonstrating: (1) that the limitation listed in part 5.5 or 5.6 is not technically or economically feasible to meet, or (2) that other factors, such as dispersion or degradation, result in contaminant levels that do not attain or exceed the preventive action limit or enforcement standard beyond the groundwater design management zone. Alternate monthly average effluent limits approved by the Department shall not exceed the NR 140 groundwater enforcement standard, and the approved alternate limits supersede the limits listed in parts 5.5 and 5.6 of this permit.

### **5.4. Monitoring and Analysis Methods**

The total daily discharge volume shall be measured as specified in NR 218.05, Wis. Adm. Code and shall have a daily sample frequency. See part 2.5 of this permit for the required sampling frequency and part 2.4 of this permit for the required analysis methods.

### 5.5. Effluent Discharge Limitations for Petroleum Contaminants

The monthly average effluent limitations for frequently detected petroleum contaminants are as follows:

Acetone	-	200 ug/L	Methyl isobutyl ketone	-	50 ug/L
Benzene	-	0.5 ug/L	Methyl tert-butyl ether	-	12 ug/L
Benzo(a)pyrene	-	0.02 ug/L	Naphthalene	-	10 ug/L
Benzo(b)fluoranthene	-	0.02 ug/L	Pyrene	-	50 ug/L
Chrysene	-	0.02 ug/L	Pyridine	-	2 ug/L
Ethylbenzene	-	140 ug/L	Styrene	-	10 ug/L
Ethylene Dibromide	-	0.005 ug/L	Tetrahydrofuran	-	10 ug/L
Fluoranthene	-	80 ug/L	Toluene	-	160 ug/L
Fluorene	-	80 ug/L	Trimethylbenzenes	-	96 ug/L
Lead	-	1.5 ug/L	(combined 1,2,4 & 1,3,5)		
Methyl ethyl ketone	-	90 ug/L	Total BETX	-	750 ug/L

### 5.6. Effluent Limitations for Chlorinated Volatile Organic Contaminants

The monthly average effluent limitations for frequently detected chlorinated volatile organic compounds are as follows:

1,1-Dichloroethane	-	85 ug/L	Chloromethane	-	0.3 ug/L
1,2-Dichloroethane	-	0.5 ug/L	Methylene Chloride	-	0.5 ug/L
1,1-Dichloroethylene	-	0.7 ug/L	Pentachlorophenol	-	0.1 ug/L
1,2-Dichloroethylene (cis)	-	7 ug/L	1,1,1,2-Tetrachloroethane	-	7 ug/L
1,2-Dichloroethylene (trans)	-	20 ug/L	1,1,2,2-Tetrachloroethane	-	0.02ug/L
1,2-Dichlorobenzene	-	60 ug/L	Tetrachloroethylene	-	0.5 ug/L
1,3-Dichlorobenzene	-	125 ug/L	1,1,1-Trichloroethane	-	40 ug/L
1,4-Dichlorobenzene	-	15 ug/L	1,1,2-Trichloroethane	-	0.5 ug/L
Carbon tetrachloride	-	0.5 ug/L	Trichloroethylene	-	0.5 ug/L
Chloroethane	-	80 ug/L	1,2,4-Trichlorobenzene	-	14 ug/L
Chloroform	-	0.6 ug/L	Vinyl Chloride	-	0.02 ug/L

## **6. ADDITIONAL REQUIREMENTS FOR DISCHARGES DESIGNED TO ENHANCE THE REMEDIATION OF IN-SITU CONTAMINANTS**

Discharge of remedial action additives and wastewater through an infiltration system designed to enhance the remediation of in-situ contaminants in soil or groundwater shall meet the requirements in this section, including the effluent limitations and monitoring requirements specified below. Monitoring during a specified sampling period is required when remedial action wastewater is discharged to an infiltration system anytime during the sampling period. Samples representative of the discharge shall be collected at each outfall following treatment and prior to discharge to the infiltration system.

### **6.1. Wastewater Treatment**

Best Available Wastewater Treatment (see part 2.2) is required to minimize the level of contaminants discharged to the groundwater to the extent that it is technically and economically feasible and necessary to prevent exceedance of: (a) applicable groundwater standards contained in ch. NR 140, Wis. Adm. Code, tables 1 through 3, or (b) any temporary exemption granted under s. NR 140.28 (5), Wis. Adm. Code.

### **6.2. Wastewater Testing/Discharge Management Plan**

The permittee shall submit a discharge management plan (see part 2.3) that specifies the contaminants proposed to be monitored under this permit. Any discharge under this permit shall be consistent with a discharge management plan that has been approved by the Department. The discharge management plan shall specify monitoring of the water to be infiltrated or injected, and may also include monitoring of groundwater in wells that confirms that the groundwater protection requirements of ch. NR 140, Wis. Adm. Code (including any s. NR 140.28(5) temporary exemption requirements) are being met. At a minimum, the monitoring parameters shall include the contaminants, the contaminant breakdown products, field pH and oxidation/reduction potential.

### **6.3. Limitations for Projects with No NR 140.28(5) Temporary Exemption**

When a s. NR 140.28(5), temporary exemption has not been granted for an in-situ remediation project, the monthly average discharge limits for water to be infiltrated or injected are the equivalent to those listed in parts 5.5 and 5.6 of this permit. Also, when a s. NR 140.28(5), temporary exemption has not been issued, the concentration of nitrogen compounds in the injected or infiltrated water shall not exceed the following concentrations on a monthly average basis: 2 mg/L nitrate+nitrite-nitrogen, 3 mg/L organic-nitrogen, and 3 mg/L ammonia-nitrogen.

### **6.4. Requirements for Projects Granted a NR 140.28(5) Temporary Exemption**

When a remedial action project has been granted a s. NR 140.28(5) exemption, the in-situ remediation process shall be conducted in compliance with the terms and conditions of the Department of Natural Resources approval under s. 292.31, Wisconsin Statutes, and the temporary exemption granted under s. NR 140.28(5).

### **6.5. Flow Monitoring and Contaminant Sampling Frequency**

Total daily discharge flow shall be recorded daily. The contaminant sampling frequency shall be quarterly, except that the Department may approve, in a discharge management plan, a semi-annual monitoring frequency if the permittee demonstrates that the in-situ treatment process is effectively reducing contaminant levels at the site and the contaminated area is not significantly expanded as a result of the in-situ remedial activities.

### **6.6. Degradation By-Products**

All by-products formed as a result of the remediation process shall be further degraded or removed if those by-products are found at concentrations which constitute a risk to either human health or the environment.

## **7. ADDITIONAL REQUIREMENTS FOR DISCHARGES OF AGRI-CHEMICAL REMEDIATION WATER TO FARM FIELDS**

Land application of pesticide and fertilizer remedial action wastewater under this permit on agricultural fields shall meet the requirements of this permit section including the effluent limitations and monitoring requirements specified below. Monitoring during a specified sampling period is required when remedial action wastewater is discharged to a land application site during the sampling period. Samples representative of the discharge to the land application system shall be taken following treatment and prior to land application.

### **7.1. Wastewater Treatment**

Best Available Wastewater Treatment (see part 2.2) is required to minimize the level of contaminants in the groundwater and to prevent exceedance of groundwater standards contained in ch. NR 140, Wis. Adm. Code, to the extent that it is technically and economically feasible.

### **7.2. Land Application Restrictions**

Pesticide and fertilizer agri-chemical remediation wastewater applied to farm fields shall be for the beneficial use of the crop and any pesticide contribution shall be in accordance with the appropriate pesticide product label restrictions.

### **7.3. Ponding and Runoff Prohibited**

The sprayed wastewater shall seep in as it is sprayed; wastewater ponding and runoff are prohibited. Should poor conditions, such as rain moistened soil create a tendency for ponding, the rate of spray shall be reduced until there is no ponding or runoff. No spraying is allowed on frozen soil. The wastewater must be kept out of all surface waterways.

### **7.4. Chloride Loading**

The total pounds of chloride applied shall be limited to 340 pounds per acre per consecutive 2 year period.

### **7.5. Nitrogen Loading**

The total pounds of nitrogen (Nitrate+Ammonia+Organic - Nitrogen) applied shall be limited to nutrient needs of the cover crop minus any supplemental nitrogen fertilizer or manure applied.

### **7.6. Discharge Monitoring**

The total daily discharge volume shall be recorded daily. The permittee shall monitor the discharge for all of the pesticides, nitrogen forms and phosphorus detected in the wastewater unless the Department approves a discharge management plan (see part 2.3) with a reduced list of contaminants for monitoring.

### **7.7. Sample Frequency**

The contaminant monitoring frequency shall be weekly, except the Department may approve a sampling frequency reduction to monthly in the approved Discharge Management Plan when the wastewater has relatively consistent contaminant levels.

### **7.8. No Detrimental Impact**

The discharge of substances in the remedial water shall not permanently impair future use of the affected soil, groundwater or aquifer.



## 8. ADDITIONAL STANDARD REQUIREMENTS

**8.1. NR 205, Wisconsin Administrative Code:** The permittee shall comply with the conditions in ss. NR 205.07(1) and NR 205.07(3), Wis. Adm. Code, which are included by reference in this permit, except for s. NR 205.07(1)(n), which does not apply to facilities covered under general permits. The paragraphs below that contain a reference to parts of s. NR 205.07 are included for the permittee's convenience.

**8.2. Spill Reporting for Hazardous Substances:** The permittee shall immediately notify the Department of an accidental release or spill of any hazardous substance to the environment as specified in ch. NR 706 and s. NR 205.07(3)(b), Wis. Adm. Code. The Department shall be notified via the 24-hour toll free spills hotline (1-800-943-0003).

**8.3. Duty to Halt or Reduce Activity:** Upon failure or impairment of treatment facility operation, the permittee shall as required in s. NR 205.07(3)(e) and to the extent necessary to maintain compliance with its permit, curtail production or wastewater discharges or both until the treatment facility operations are restored or an alternative method of treatment is provided.

**8.4. Permit Noncompliance Reporting:** As specified in s. NR 205.07(1)(s), Department notification is required within 24 hours of becoming aware of permit noncompliance.

**8.5. Bypassing:** As specified in s. NR 205.07(1)(u) & (v) bypass or overflow of wastewater at the treatment works or collection system is prohibited unless there were no feasible alternatives to the bypass, the bypass is necessary to prevent severe injury or property damage, and the permittee notified the Department as required in s. NR 205.07(1)(u)3.

**8.6. Planned Changes:** The permittee shall report to the Department any facility expansion, production increase or process modifications which will result in new, different or increased discharges of pollutants as set forth in s. NR 205.07(3)(c).

**8.7. Inspection and Entry:** The permittee shall allow an authorized representative of the Department, upon the presentation of credentials, to enter the permittee's premises, have access to records, and inspect and monitor the discharge as described in s. NR 205.07(1)(d).

**8.8. Authorized Signature:** Reports, records, and monitoring results required by this permit shall be signed by the permittee's authorized representative or, in his or her absence, as specified in s. NR 205.07(1)(g).

**8.9. Water Quality Sampling and Testing Procedures:** Sampling and laboratory analysis procedures shall be performed as specified in s. NR 205.07(1)(p) and as set forth below. Sampling and analysis of effluent samples shall be performed as specified in chs. NR 218 and NR 219, Wis. Adm. Code, respectively. The sampling and analysis shall be performed by a laboratory certified or registered in accordance with the requirements of ch. NR 149. Total daily discharge volume shall be measured as specified in s. NR 218.05, Wis. Adm. Code. EPA method 200.8 or 239.2 shall be used on unmodified effluent samples for the determination of total recoverable lead. EPA method 1664A (or Standard Method 5520 B) shall be used for determination of oil and grease. EPA Method 160.2 (or Standard Method 2540 D) shall be used for determination of total suspended solids.

## **8.10. Retention and Submittal of Reports, Records, and Monitoring**

**Results:** The permittee shall retain records of all monitoring required by this permit and reported monitoring results as set forth in s. NR 205.07(1)(f) and (r) and as follows: reports, records, and monitoring results required by this permit shall be retained by the permittee for the duration of this permit or three years after this information is generated, whichever is longer.

**8.11. Recording of Results:** For each effluent measurement or sample taken, the permittee shall record the following information as required in s. NR 205.07(1)(e):

- The date, exact place, method and time of sampling or measurements,
- The individual who performed the sampling or measurements,
- The date of the analysis and the individual who performed the analysis,
- The analytical techniques or methods used, and the results of the analysis.

**8.12. More Frequent Monitoring:** As specified in NR 205.07(1)(r), if the permittee monitors any parameter more frequently than required by the permit, using test procedures specified in ch. NR 219, Wis. Adm. Code or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the discharge monitoring report.

**8.13. Conventions for the Reporting and Use of Low Level Results:** The permittee shall use the following conventions when reporting effluent monitoring results: (a) non-detected pollutant results shall be reported as < (less than) the value of the analytical method's limit of detection; (b) pollutant concentrations equal to or greater than the limit of detection, but less than the limit of quantitation, shall be reported and the limit of quantitation shall be specified; and (c) a zero value may be substituted for any non-detected pollutant result for the purposes of calculating an average or a mass discharge.

**8.14. Continuation of an Expired General Permit:** As provided in s. NR 205.08(9), the terms and conditions of this general permit shall continue to apply until this general permit is reissued or revoked or until an individual permit is issued for the discharge to which the general permit applied. The status of a general permit and forms for updating facility information can be accessed on the Department website by searching for WPDES Wastewater General Permits.

**8.15. Enforcement:** Any violation of this permit is enforceable under ss. 283.89 and 283.91, Wisconsin Statutes.

**8.16. Severability:** The provisions of this permit are severable, and if any provisions of this permit or the application of any provision of this permit to any circumstance is held invalid the remainder of this permit shall not be affected thereby.

**8.17. Work near Surface Waters and Wetlands:** Any work performed in wetland areas or within areas subject to local floodplain and shoreland regulations must conform to all applicable county or local ordinances. All applicable state permits and/or contracts required by chs. 30, 31 and 87, Wis. Stats. (or Wisconsin Administrative Code adopted under these laws), and applicable federal permits must be obtained as necessary.

**Attachment C**  
**GETS WPDES Compliance Sample Results**

Table 1  
GETS WPDES Compliance Sample Results  
Madison-Kipp Corporation Site  
201 Waubesa Street, Madison, Wisconsin

PARAMETER	PERMIT DISCHARGE LIMITS	UNIT	EFFLUENT 7/15/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 7/24/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 7/27/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 7/29/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 7/30/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 7/31/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 8/5/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 8/13/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 8/21/2015	PERCENT OF DISCHARGE LIMIT
Oil & Grease	10	mg/L	1.3 JB	13%	2.0 JB	20%	NA	-	NA	-	3.0 JB	30%	NA	-	1.0 BJ	10%	1.8 JB	18%	1.6 J	16%
Chloride	395	mg/L	220	56%	200	51%	NA	-	NA	-	190	48%	NA	-	180	46%	190 B	48%	210 B	53%
Total Suspended Solids	40	mg/L	<1.6	-	3.5 J	9%	NA	-	NA	-	<1.6	-	NA	-	<1.6	-	2.5 J	6%	5	13%
Biological Oxygen Demand	20	mg/L	<2.0	-	<2.0	-	NA	-	NA	-	<2.0	-	NA	-	<2.0	-	<2.0	-	<2.0	-
<b>VOCs</b>																				
1,1,1-Trichloroethane	50	µg/L	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-
1,1,2,2-Tetrachloroethane	50	µg/L	<0.23	-	<0.23	-	<0.23	-	<0.23	-	<0.23	-	<0.23	-	<0.22	-	<0.22	-	<0.23	-
1,1,2-Trichloroethane	50	µg/L	<0.28	-	<0.28	-	<0.28	-	<0.28	-	<0.28	-	<0.28	-	<0.28	-	<0.28	-	<0.28	-
1,1-Dichloroethene	50	µg/L	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-
1,2-Dichloroethane	180	µg/L	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-
Benzene	50	µg/L	<0.074	-	<0.074	-	<0.074	-	<0.074	-	<0.074	-	<0.074	-	<0.074	-	<0.074	-	<0.074	-
Bromodichloromethane	120	µg/L	<0.17	-	<0.17	-	<0.17	-	<0.17	-	<0.17	-	<0.17	-	<0.17	-	<0.17	-	<0.17	-
Bromoform	120	µg/L	<0.33	-	<0.33	-	<0.33	-	<0.33	-	<0.33	-	<0.33	-	<0.33	-	<0.33	-	<0.33	-
Bromomethane	NE	µg/L	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-	<0.31	-
Carbon Tetrachloride	150	µg/L	<0.26	-	<0.26	-	<0.26	-	<0.26	-	<0.26	-	<0.26	-	<0.26	-	<0.26	-	<0.26	-
cis-1,2-Dichloroethene	NE	µg/L	150	-	53	-	53 F1	-	61	-	60	-	64	-	51	-	25	-	16	-
Chloromethane	NE	µg/L	<0.19	-	<0.19	-	<0.19	-	<0.19	-	<0.19	-	<0.19	-	<0.19	-	<0.19	-	<0.19	-
Ethylbenzene	NE	µg/L	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-
Tetrachloroethene	50	µg/L	270	<b>540%</b>	46	<b>92%</b>	46	<b>92%</b>	54	<b>108%</b>	47	<b>94%</b>	48	<b>96%</b>	47	<b>94%</b>	46	<b>92%</b>	39	<b>78%</b>
Toluene	NE	µg/L	<0.12	-	<0.12	-	<0.12	-	<0.12	-	<0.12	-	<0.12	-	<0.12	-	<0.12	-	<0.12	-
Total Xylenes	NE	µg/L	<0.069	-	<0.069	-	<0.069	-	<0.069	-	<0.069	-	<0.069	-	<0.069	-	<0.069	-	<0.069	-
trans-1,2-Dichloroethene	NE	µg/L	0.41 J	-	<0.25	-	<0.25	-	<0.25	-	<0.25	-	<0.25	-	<0.25	-	<0.25	-	<0.25	-
Trichloroethene	50	µg/L	52	<b>104%</b>	12	24%	12	24%	13	26%	13	26%	14	28%	12	24%	7.4	15%	4.5	9%
Vinyl chloride	10	µg/L	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-	<0.29	-
Total BTEX <sup>(1)</sup>	750	µg/L	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-	<0.13	-
Total VOCs (includes BTEX)	NE	µg/L	472	-	111	-	111	-	128	-	120	-	126	-	110	-	78.4	-	59.5	-
<b>PAHs</b>																				
Benzo(a)anthracene	NE	µg/L	<0.023	-	<0.023	-	NA	-	NA	-	<0.023	-	NA	-	<0.023	-	<0.025	-	<0.023	-
Benzo(a)pyrene	0.1	µg/L	<0.023	-	<0.023	-	NA	-	NA	-	<0.023	-	NA	-	<0.023	-	<0.025	-	<0.023	-
Benzo(b)fluoranthene	NE	µg/L	<0.023	-	<0.023	-	NA	-	NA	-	<0.023	-	NA	-	<0.023	-	<0.025	-	<0.023	-
Benzo(g,h,i)perylene	NE	µg/L	<0.045	-	<0.046	-	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	<0.050	-	<0.046	-
Benzo(k)fluoranthene	NE	µg/L	<0.045	-	<0.046	-	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	<0.050	-	<0.046	-
Chrysene	NE	µg/L	<0.045	-	<0.046	-	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	<0.050	-	<0.046	-
Dibenzo(a,h)anthracene	NE	µg/L	<0.023	-	<0.023	-	NA	-	NA	-	<0.023	-	NA	-	<0.023	-	<0.025	-	<0.023	-
Fluoranthene	NE	µg/L	<0.045	-	<0.046	-	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	<0.050	-	<0.046	-
Indeno(1,2,3-cd)pyrene	NE	µg/L	<0.023	-	<0.023	-	NA	-	NA	-	<0.023	-	NA	-	<0.023	-	<0.025	-	<0.023	-
Naphthalene	70	µg/L	<0.045	-	<0.046	-	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	<0.050	-	<0.046	-
Phenanthrene	NE	µg/L	<0.045	-	0.047 J	-	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	0.081 JB	-	<0.046	-
Pyrene	NE	µg/L	<0.045	-	<0.046	-	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	<0.050	-	<0.046	-
PAHs Group of 10 Total <sup>(2)</sup>	0.1	µg/L	<0.045	-	0.047	47%	NA	-	NA	-	<0.046	-	NA	-	<0.046	-	0.081	<b>81%</b>	<0.046	-

**Notes:**

- < = Less than
- µg/L = Micrograms per liter
- mg/L = Milligrams per liter
- B = Compound was found in the blank and in the sample.
- J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit
- F1 = MS and/or MSD Recovery is outside acceptance limits.
- \* = ISTD response or retention time outside of acceptable limits.
- ND = Not Detected
- NE = Not Established
- NA=Not Analyzed
- Bold %** = Analyte detected at a concentration above 60% of permit discharge limit.
- = Percent of permit limit not calculated because analyte was not detected or standard is not established.
- PAHs = Polynuclear Aromatic Hydrocarbons
- VOCs = Volatile Organic Compounds

**Footnotes:**

- <sup>(1)</sup> Total BTEX is the sum of the benzene, toluene, ethylbenzene and xylene concentrations. If all compounds were below their corresponding laboratory detection limits, then the highest detection limit of the BTEX compounds was noted.
- <sup>(2)</sup> PAH group of 10 (Polynuclear Aromatic Hydrocarbons) include the sum of the following individual compounds: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene. If all compounds were below their corresponding laboratory detection limits, then the highest detection limit of the PAH group compounds was noted.

Table 1  
GETS WPDES Compliance Sample Results  
Madison-Kipp Corporation Site  
201 Waubesa Street, Madison, Wisconsin

PARAMETER	PERMIT DISCHARGE LIMITS	UNIT	EFFLUENT 9/2/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 10/5/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 11/9/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 12/9/2015	PERCENT OF DISCHARGE LIMIT	EFFLUENT 1/18/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 2/8/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 3/7/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 4/6/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 5/4/2016	PERCENT OF DISCHARGE LIMIT
Oil & Grease	10	mg/L	3.0 JB	30%	2.6 JB	26%	1.2 JB	12%	1.5 JB	15%	2.5 JB	25%	<0.57	-	0.87 J B F1	9%	0.86 J	9%	1.1 J B	11%
Chloride	395	mg/L	130	33%	140	35%	110	28%	100 B	25%	140	35%	110	28%	100	25%	100	25%	100	25%
Total Suspended Solids	40	mg/L	<1.6	-	<1.6	-	<1.6	-	<1.6	-	<1.6	-	<1.6	-	<1.6	-	5.0	13%	<1.6	-
Biological Oxygen Demand	20	mg/L	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-
<b>VOCs</b>																				
1,1,1-Trichloroethane	50	µg/L	<0.20	-	<0.20	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-
1,1,2,2-Tetrachloroethane	50	µg/L	<0.23	-	<0.23	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-
1,1,2-Trichloroethane	50	µg/L	<0.28	-	<0.28	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-
1,1-Dichloroethene	50	µg/L	<0.31	-	<0.31	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-
1,2-Dichloroethane	180	µg/L	<0.29	-	<0.29	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-
Benzene	50	µg/L	<0.074	-	<0.074	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-
Bromodichloromethane	120	µg/L	<0.17	-	<0.17	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-
Bromoform	120	µg/L	<0.33	-	<0.33	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-
Bromomethane	NE	µg/L	<0.31	-	<0.31	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-
Carbon Tetrachloride	150	µg/L	<0.26	-	<0.26	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-
cis-1,2-Dichloroethene	NE	µg/L	33	-	9.8	-	15	-	19	-	18	-	19	-	19	-	18	-	17	-
Chloromethane	NE	µg/L	<0.19	-	<0.19	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-
Ethylbenzene	NE	µg/L	<0.13	-	<0.13	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-
Tetrachloroethene	50	µg/L	48	<b>96%</b>	23	46%	32	<b>64%</b>	40	<b>80%</b>	46	<b>92%</b>	43	<b>86%</b>	40	<b>80%</b>	34	<b>68%</b>	38	<b>76%</b>
Toluene	NE	µg/L	<0.12	-	<0.12	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-
Total Xylenes	NE	µg/L	<0.069	-	<0.069	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	0.61 J	-	<0.40	-
trans-1,2-Dichloroethene	NE	µg/L	<0.25	-	<0.25	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-
Trichloroethene	50	µg/L	8.9	18%	2.9	6%	4.7	9%	6.2	12%	5.7	11%	6.4	13%	6.3	13%	5.6	11%	5.9	12%
Vinyl chloride	10	µg/L	<0.29	-	<0.29	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-
Total BTEX <sup>(1)</sup>	750	µg/L	<0.13	-	<0.13	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	0.61 J	0.1%	<0.40	-
Total VOCs (includes BTEX)	NE	µg/L	89.9	-	35.7	-	51.7	-	65.2	-	69.7	-	68.4	-	65.3	-	58.21	-	60.9	-
<b>PAHs</b>																				
Benzo(a)anthracene	NE	µg/L	<0.023	-	<0.025	-	<0.022	-	<0.024	-	<0.026	-	<0.024	-	<0.024*	-	<0.023	-	<0.023 *	-
Benzo(a)pyrene	0.1	µg/L	<0.023	-	<0.025	-	<0.022	-	<0.024	-	<0.026	-	<0.024	-	<0.024	-	<0.023	-	<0.023	-
Benzo(b)fluoranthene	NE	µg/L	<0.023	-	<0.025	-	<0.022	-	<0.024	-	<0.026	-	<0.024	-	<0.024	-	<0.023	-	<0.023	-
Benzo(g,h,i)perylene	NE	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048	-	<0.046	-	<0.046	-
Benzo(k)fluoranthene	NE	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048	-	<0.046	-	<0.046	-
Chrysene	NE	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048*	-	<0.046	-	<0.046 *	-
Dibenzo(a,h)anthracene	NE	µg/L	<0.023	-	<0.025	-	<0.022	-	<0.024	-	<0.026	-	<0.024	-	<0.024	-	<0.023	-	<0.023	-
Fluoranthene	NE	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048	-	<0.046	-	<0.046	-
Indeno(1,2,3-cd)pyrene	NE	µg/L	<0.023	-	<0.025	-	<0.022	-	<0.024	-	<0.026	-	<0.024	-	<0.024	-	<0.023	-	<0.023	-
Naphthalene	70	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048	-	<0.046	-	0.077 J	0.1%
Phenanthrene	NE	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048	-	<0.046	-	<0.046	-
Pyrene	NE	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048*	-	<0.046	-	<0.046 *	-
PAHs Group of 10 Total <sup>(2)</sup>	0.1	µg/L	<0.046	-	<0.049	-	<0.045	-	<0.048	-	<0.052	-	<0.048	-	<0.048	-	<0.046	-	<0.046	-

**Notes:**

- < = Less than
- µg/L = Micrograms per liter
- mg/L = Milligrams per liter
- B = Compound was found in the blank and in the sample.
- J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit
- F1 = MS and/or MSD Recovery is outside acceptance limits.
- \* = ISTD response or retention time outside of acceptable limits.
- ND = Not Detected
- NE = Not Established
- NA = Not Analyzed
- Bold %** = Analyte detected at a concentration above 60% of permit discharge limit.
- = Percent of permit limit not calculated because analyte was not detected or standard is not established.
- PAHs = Polynuclear Aromatic Hydrocarbons
- VOCs = Volatile Organic Compounds

**Footnotes:**

- <sup>(1)</sup> Total BTEX is the sum of the benzene, toluene, ethylbenzene and xylene concentrations. If all compounds were below their corresponding laboratory detection limits, then the highest detection limit of the BTEX compounds was noted.
- <sup>(2)</sup> PAH group of 10 (Polynuclear Aromatic Hydrocarbons) include the sum of the following individual compounds: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene. If all compounds were below their corresponding laboratory detection limits, then the highest detection limit of the PAH group compounds was noted.

Table 1  
GETS WPDES Compliance Sample Results  
Madison-Kipp Corporation Site  
201 Waubesa Street, Madison, Wisconsin

PARAMETER	PERMIT DISCHARGE LIMITS	UNIT	EFFLUENT 6/7/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 7/20/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 8/8/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 9/9/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 10/10/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 11/7/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 12/07/2016	PERCENT OF DISCHARGE LIMIT	EFFLUENT 01/12/2017	PERCENT OF DISCHARGE LIMIT
Oil & Grease	10	mg/L	<1.4	-	1.6 J F1	16%	1.5 J F1 B	15%	<1.4	-	<1.4	-	<1.4	-	<1.4	-	3.1 J B	31%
Chloride	395	mg/L	98	25%	70	18%	110	28%	110	28%	110 B	28%	120	30%	100 B	25%	110 B	28%
Total Suspended Solids	40	mg/L	5.5	14%	2.5 J	6%	<2.5	-	4.0 J	10%	15	38%	3.0 J	8%	<2.5	-	<2.5	-
Biological Oxygen Demand	20	mg/L	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-	<2.0	-
<b>VOCs</b>																		
1,1,1-Trichloroethane	50	µg/L	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-
1,1,2,2-Tetrachloroethane	50	µg/L	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-
1,1,2-Trichloroethane	50	µg/L	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-
1,1-Dichloroethane	50	µg/L	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-
1,2-Dichloroethane	180	µg/L	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-	<0.39	-
Benzene	50	µg/L	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-
Bromodichloromethane	120	µg/L	<0.37	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-	<0.37	-
Bromoform	120	µg/L	<0.45	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-	<0.45	-
Bromomethane	NE	µg/L	<0.65	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-	<0.65	-
Carbon Tetrachloride	150	µg/L	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-	<0.38	-
cis-1,2-Dichloroethene	NE	µg/L	16	-	18	-	19	-	19	-	17	-	22	-	18	-	14	-
Chloromethane	NE	µg/L	<0.32	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-	<0.32	-
Ethylbenzene	NE	µg/L	<0.18	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-	<0.18	-
Tetrachloroethene	50	µg/L	36	<b>72%</b>	37	<b>74%</b>	35	<b>70%</b>	39	<b>78%</b>	32	<b>64%</b>	35	<b>70%</b>	28	56%	21	42%
Toluene	NE	µg/L	<0.15	-	<0.15	-	<0.15	-	<0.15	-	<0.15	-	0.93	-	<0.15	-	<0.15	-
Total Xylenes	NE	µg/L	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-
trans-1,2-Dichloroethene	NE	µg/L	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-	<0.35	-
Trichloroethene	50	µg/L	5.4	11%	8.3	17%	7.2	14%	9.2	18%	5.8	12%	8.8	18%	6.5	13%	5.5	11%
Vinyl chloride	10	µg/L	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-	<0.20	-
Total BTEX <sup>(1)</sup>	750	µg/L	<0.40	-	<0.40	-	<0.40	-	<0.40	-	<0.40	-	0.93	0.1%	<0.40	-	<0.40	-
Total VOCs (includes BTEX)	NE	µg/L	57.4	-	63.3	-	61.2	-	67.2	-	54.8	-	66.73	-	52.5	-	40.5	-
<b>PAHs</b>																		
Benzo(a)anthracene	NE	µg/L	<0.026 *	-	<0.024 *	-	<0.025 *	-	<0.024	-	<0.025	-	<0.025	-	<0.025	-	<0.025	-
Benzo(a)pyrene	0.1	µg/L	<0.026	-	<0.024	-	<0.025	-	<0.024	-	<0.025	-	<0.025	-	<0.025	-	<0.025	-
Benzo(b)fluoranthene	NE	µg/L	<0.026	-	<0.024	-	<0.025	-	<0.024	-	<0.025	-	<0.025	-	<0.025	-	<0.025	-
Benzo(g,h,i)perylene	NE	µg/L	<0.052	-	<0.048	-	<0.050	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-
Benzo(k)fluoranthene	NE	µg/L	<0.052	-	<0.048	-	<0.050	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-
Chrysene	NE	µg/L	<0.052 *	-	<0.048 *	-	<0.050 *	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-
Dibenzo(a,h)anthracene	NE	µg/L	<0.026	-	<0.024	-	<0.025	-	<0.024	-	<0.025	-	<0.025	-	<0.025	-	<0.025	-
Fluoranthene	NE	µg/L	<0.052	-	<0.048	-	<0.050	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-
Indeno(1,2,3-cd)pyrene	NE	µg/L	<0.026	-	<0.024	-	<0.025	-	<0.024	-	<0.025	-	<0.025	-	<0.025	-	<0.025	-
Naphthalene	70	µg/L	<0.052	-	<0.048	-	<0.050	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-
Phenanthrene	NE	µg/L	<0.052	-	<0.048	-	<0.050	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-
Pyrene	NE	µg/L	<0.052 *	-	<0.048 *	-	<0.050 *	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-
PAHs Group of 10 Total <sup>(2)</sup>	0.1	µg/L	<0.052	-	<0.048	-	<0.050	-	<0.048	-	<0.050	-	<0.050	-	<0.050	-	<0.050	-

**Notes:**  
 < = Less than  
 µg/L = Micrograms per liter  
 mg/L = Milligrams per liter  
 B = Compound was found in the blank and in the sample.  
 J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit  
 F1 = MS and/or MSD Recovery is outside acceptance limits.  
 \* = ISTD response or retention time outside of acceptable limits.  
 ND = Not Detected  
 NE = Not Established  
 NA = Not Analyzed  
**Bold %** = Analyte detected at a concentration above 60% of permit discharge limit.  
 - = Percent of permit limit not calculated because analyte was not detected or standard is not established.  
 PAHs = Polynuclear Aromatic Hydrocarbons  
 VOCs = Volatile Organic Compounds

Updated by: L. Auner 2/7/2017  
 Checked by: B. Wachholz 2/7/2017

**Footnotes:**  
<sup>(1)</sup> Total BTEX is the sum of the benzene, toluene, ethylbenzene and xylene concentrations. If all compounds were below their corresponding laboratory detection limits, then the highest detection limit of the BTEX compounds was noted.  
<sup>(2)</sup> PAH group of 10 (Polynuclear Aromatic Hydrocarbons) include the sum of the following individual compounds: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene. If all compounds were below their corresponding laboratory detection limits, then the highest detection limit of the PAH group compounds was noted.

**Attachment D**  
**Modified GETS Monitoring Plan**

Table 2  
Proposed GETS WPDES Compliance Sample Plan  
Madison-Kipp Corporation Site  
201 Waubesa Street, Madison, Wisconsin

PARAMETER	DISCHARGE LIMIT	SAMPLE FREQUENCY <sup>(1)</sup>	SAMPLE TYPE
Flow	gal/day <sup>(4)</sup>	Daily	Total Daily
1,1,-Dichloroethene	50 µg/L	Monthly	Grab
Benzene	50 µg/L	Monthly	Grab
cis-1,2,-Dichloroethene	µg/L <sup>(5)</sup>	Monthly	Grab
Potassium Permanganate	mg/L <sup>(4)</sup>	Monthly	Grab
Tetrachloroethene	50 µg/L	Monthly	Grab
Total BTEX <sup>(2)</sup>	750 ug/L	Monthly	Grab
trans-1,2,-Dichloroethene	µg/L <sup>(5)</sup>	Monthly	Grab
Trichloroethene	50 µg/L	Monthly	Grab
Vinyl Chloride	10 µg/L	Monthly	Grab
VOCs	µg/L <sup>(5)</sup>	Monthly	Grab
Benzo(a)pyrene	0.1 µg/L	Quarterly	Grab
Biological Oxygen Demand (BOD)	20 mg/L	Quarterly	Grab
Chloride	395 mg/L	Quarterly	Grab
Naphthalene	70 µg/L	Quarterly	Grab
PAHs Group of 10 <sup>(3)</sup>	0.1 µg/L	Quarterly	Grab
Oil & Grease	10 mg/L	Quarterly	Grab
Total Suspended Solids (TSS)	40 mg/L	Quarterly	Grab

**Notes:**

µg/L = Micrograms per liter

mg/L = Milligrams per liter

PAHs = Polynuclear Aromatic Hydrocarbons

VOCs = Volatile Organic Compounds

Updated by: A.Stehn 2/17/2017

Checked by: L. Auner 2/17/2017

**Footnotes:**

<sup>(1)</sup> The sampling frequency noted applies to both pre- and post-treatment for the GETS.

<sup>(2)</sup> Total BTEX is the sum of the benzene, toluene, ethylbenzene and xylene concentrations. If all compounds are below their corresponding laboratory detection limits, then the highest detection limit of the BTEX compounds was noted.

<sup>(3)</sup> PAH group of 10 (Polynuclear Aromatic Hydrocarbons) includes the sum of the following individual compounds: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene. If all compounds were below their corresponding laboratory detection limits, then the highest detection limit of the PAH group compounds was noted.

<sup>(4)</sup> Madison Kipp/TRC will conduct visual monitoring for this compound.

<sup>(5)</sup> No effluent limit is established, refer to section 4 of the permit.