

WPDES Low-Impact Discharge General Permit & Maple Syrup Producers

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



Obtaining a WPDES general permit for Low-impact Discharge (WI-0066575) will not be required for Maple Syrup producers until February 2021. This delay has been granted to allow applicable producers the opportunity to sample during the 2020 season.

#1 - I am 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.*

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

If you have questions, contact your General Permit representative (<https://dnr.wi.gov/topic/wastewater/generalpermits.html> - Contacts tab).



#2 - 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 - At my RO system

- The RO water and/or wastewater* is discharged 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.
- Wastewater* is discharged to a septic tank and drain field, holding tank that is pumped and hauled or a sanitary sewer. Your wastewater is regulated under a different set of rules, the GP is not required at this time.
- All water (RO water and wastewater*) is discharged to groundwater** – Your wastewater is eligible for the GP. Go to **“How to apply for a permit”**.
- Wastewater* is discharged to groundwater** - You are eligible for the GP. **Go to “How to apply for a permit”**.

* For RO system dischargers, wastewater is defined as the reject water that results from the wash/rinse process.

** A groundwater discharge is sent via infiltration or seepage. 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. The package is required to include:

Notice of intent (NOI) – The NOI and a copy of the permit can be found at (<https://dnr.wi.gov/topic/wastewater/generalpermits.html>) - General Permits tab under Low-impact Discharge).

Maple syrup producers are not required to obtain a permit until February 2021. To prepare for the application process, it is suggested that producers take the Oil and Grease sample, record the narrative discharge requirements and maintain a list of additives during the 2020 season.

- For groundwater discharges, one wastewater sample of Oil and Grease must be included. Sample type and limit can be found in section 3.1.1 of the permit.
- 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. Additives with the active ingredient chlorine, hypochlorite, sulfuric acid, hydrochloric acid or sodium hydroxide are exempt.

Best Management Practice (BMP) Plan – A BMP template can be found at (<https://dnr.wi.gov/topic/wastewater/generalpermits.html>) - General Permits tab under Low-impact Discharge). The plan should identify the following (section 6.6 of the permit).

- Name and location of facility;
- Statement of BMP policy and objectives – Identify pollutants discharged and how the effects shall be minimized by maintaining proper operation and following the BMP;
- Structure and role of the BMP Committee – Owner or interested staff;
- Facility contact information;
- Description of facility site evaluation and assessment – Identify potential pollutant sources at the site;
- Visual inspection program of the discharge with an example log – See section 3.1.2 for more information and include temporary practices to be implemented in case of observed pollution in the discharge;
- Security Plan – A plan to prevent non-authorized entry of the facility;
- Employee BMP training program – How will you share the BMP plan with staff;
- Good housekeeping program – How do you maintain a clean work site;
- Preventative maintenance program - Methods to prevent breakdowns and accidental releases;
- Description of erosion and sediment control practices – What will be used to minimize erosion caused by the discharge;
- Contingency plan – What would happen in the case of system failure;
- Recordkeeping and reporting - How will you keep discharge results, notes for preventative maintenance, record visual inspection; and
- Any necessary plans and specifications, drawings or site maps showing the facility location and the location of each outfall developed in accordance with good engineering practices.

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.

