

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

PUBLIC NOTICE OF INTENT TO REISSUE A WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM (WPDES) PERMIT No.WI-0003671-09-0

Permittee: Ahlstrom Mosinee LLC, 100 Main St, Mosinee, WI, 54455

Facility Where Discharge Occurs: Ahlstrom Mosinee LLC, Highway 153 East

Receiving Water And Location: Wisconsin River

Brief Facility Description and Summary of Proposed Changes: Products: The Mosinee Mill produces 299 TPD (tons per day) of unbleached kraft hardwood and softwood pulps. From the unbleached pulp and purchased bleached pulp, the Mosinee Mill produces, on average, 318 TPD of unbleached and bleached kraft papers, primarily for specialty industrial markets. The Mosinee Mill manufactures hundreds of specialty papers from dozens of paper grades. Each specialty paper is made to the customer's specifications. Example applications of the Mill's paper include wrapping for single edge razor blades, backing for masking tape, insulating wrap for electrical wires, absorptive pads for evaporative coolers, expandable paper folders, seed germinating paper, layering material for high pressure laminates such as Formica and food packaging composite fiber cans for biscuit dough, cleaners and potato chips.

The Mosinee Mill treats its process wastewaters prior to discharge to the Wisconsin River. The Mill's wastewater treatment system provides pH neutralization, primary clarification and secondary biological treatment via a three-stage, oxygen activated-sludge process. Sulfuric acid and sodium hydroxide are used to neutralize wastewaters, phosphoric acid and aqueous ammonia are added to the biological treatment system as nutrients, and alum and polymer are added to the secondary clarifier to enhance settling. Treatment system sludge is dewatered and subsequently combusted as fuel in an onsite power boiler or landfilled at the onsite landfill.

The Mosinee Mill can divert treatment system influent and effluent to a holding pond, which is located adjacent to the Mill's landfill. The Mill utilizes the pond to store groundwater collected downgradient from its landfill, effluent during the wasteload allocation season when effluent limitations are restrictive, and spills that occur within production facilities. The Mill pumps the contents of the holding pond and blends it with the influent to the Mill's wastewater treatment system. Production activities at the Mosinee Mill generate on average 10.2 MGD (million gallons per day) of treated process wastewaters and 12.9 MGD of noncontact cooling water. Quality of treated process wastewaters averaged 12 mg/L of BOD5 (5-day biochemical oxygen demand), 22.9 mg/L of TSS (total suspended solids), and 0.29 mg/L of total phosphorus.

Sanitary wastes are discharged to the City of Mosinee.

Notable Changes:

- Intake structure compliance schedule.
- New surface water outfall for tracking controlled diversions (Outfall 010)
- New land application outfall (Outfall 009)
- Holding pond compliance schedule

BOD5 Reallocation:

Pursuant to ch. NR 212, Wis. Adm. Code and after consideration of the demonstration of need provided to the department by the Mosinee Mill and providing notice on the availability of this allocation, the department is proposing to continue the 90% BOD5 reallocation from the (now closed) Brokaw Mill to the Mosinee Mill for the next permit term. A public hearing was held on 05/25/2023.

Permit Drafter's Name, Address, Phone and Email: Nate Willis, DNR, 101 S. Webster St. PO Box 7921, Madison, WI, 53707-7921, (608) 535-2369, Nathaniel.Willis@wisconsin.gov

Basin Engineer's Name, Address, Phone and Email: Nicholas Lindstrom, 1300 W Clairemont Avenue, Eau Claire, WI 54701, (715) 492-1787, Nicholas.Lindstrom@wisconsin.gov

The Department has tentatively decided that the above-specified WPDES permit should be reissued.

Limitations and conditions which the Department believes adequately protect the receiving water are included in the proposed permit. Land application of waste shall be done in accordance with permit conditions and applicable codes. All land application sites shall be approved prior to their use. To receive a list of approved sites, or to be notified of potential approvals, contact the above-named basin engineer.

Persons wishing to comment on or object to the proposed permit action, or to request a public hearing, may write to the Department of Natural Resources at the above-named permit drafter's address. All comments or suggestions received no later than 30 days after the publication date of this public notice will be considered along with other information on file in making a final decision regarding the permit. Anyone providing comments in response to this public notice will receive a notification of the Department's final decision when the permit is issued. Where designated as a reviewable surface water discharge permit, the U.S. Environmental Protection Agency is allowed up

to 90 days to submit comments or objections regarding this permit determination. If no comments are received on the proposed permit from anyone, including U.S. EPA, the permit will be issued as proposed.

The Department may schedule a public informational hearing if requested by any person and shall schedule a public informational hearing if a petition requesting a hearing is received from 5 or more persons or if response to this notice indicates significant public interest pursuant to s. 283.49, Wis. Stats. Requests for a public informational hearing shall state the following: the name and address of the person(s) requesting the hearing; the interest in the proposed permit of the person(s) requesting the hearing; the reasons for the request; and the issues proposed to be considered at the hearing.

Information on file for this permit action, including the draft permit, fact sheet and permit application, may be inspected and copied at either the above-named permit drafter's office or the above named basin engineer's office, Monday through Friday (except holidays), between 9:00 a.m. and 3:30 p.m. Please call the permit drafter or basin engineer for directions to their office location, if necessary. Information on this permit action may also be obtained by calling the permit drafter at (608) 893-5566 or by writing to the Department. Reasonable costs (15 cents per page for copies and 7 cents per page for scanning) will be charged for information in the file other than the public notice, permit and fact sheet. Permit information is also available on the internet at:

<http://dnr.wi.gov/topic/wastewater/PublicNotices.html>. Pursuant to the Americans with Disabilities Act, reasonable accommodation, including the provision of informational material in an alternative format, will be made to qualified individuals upon request.

PUBLIC NOTICE OF DECISION TO REALLOCATE BOD₅ WASTELOAD

Source of Wasteload Allocations: Wisconsin Pollutant Discharge Elimination System (WPDES) Permit No. WI-0003379-07-0 for Wausau Paper Mills, LLC, 202 2nd St., Brokaw, WI (permit terminated)

Recipient of Wasteload Allocations: Ahlstrom Mosinee, LLC, 100 Main St., Mosinee, WI

Receiving Water: Wisconsin River in the Lower Eau Claire River Watershed of the Central Wisconsin River Basin in Marathon County

Summary of Department Actions: Pursuant to s. NR 212.60(4)(c), Wis. Adm. Code, wasteload allocations (WLAs) for 5-day biochemical oxygen demand (BOD₅) may be reallocated when a WPDES permit containing BOD₅ WLAs is terminated, a six-month period is provided for persons to request reallocation of BOD₅ WLAs made available, and a public meeting is held regarding the proposed reallocation of the available BOD₅ WLAs. Section NR 212.60(4)(b), Wis. Adm. Code, requires a portion of the BOD₅ WLAs that become available with the termination of a WPDES permit to be allocated to reserve capacity for new dischargers or production increases by existing dischargers.

On August 28, 2022, the Department of Natural Resources (department) issued a public notice of the availability of Wausau Paper Mill's WLA because of Ahlstrom's allocation becoming available after the five-year temporary reallocation period. During the 6-month comment period, only Ahlstrom expressed interest in the available WLA. On May 25, 2023, a public meeting was held on the availability of the Brokaw Mill's WLA. The department did not receive any public comments or other requests for this WLA from any individuals or entities during the 6-month comment period, at the public meeting, or the seven days following the public meeting.

On January 13, 2023, the department received Ahlstrom's demonstration of need for additional WLA to fulfill the requirement of s. NR 212.60(4)(a), Wis. Adm. Code. The demonstration focused on two core motives for the transfer to of WLA from the Brokaw Mill to Ahlstrom. First, the mill has experienced episodic exceedances of the current WLA limitations. When investigating the cause of previous exceedances, Ahlstrom determined that although all treatment facilities were functioning as designed, low river flows and high river temperatures resulted in extremely stringent BOD₅ limitations in the range of 1521-1784 pounds per day. For comparison, the current categorical limit for Ahlstrom is 6,534 pounds per day.

The second need for increased WLA is to accommodate production needs in the specialty paper segment. During the WLA season, Ahlstrom used to postpone production or adjust production schedules to avoid effluent limit exceedances. The increased WLA will allow Ahlstrom greater production flexibility to meet its customers' needs.

Department's Decision: The department concludes that reallocation of available BOD₅ wasteload to the Mosinee Mill accomplishes purposes specified by s. 212.60(4)(a), Wis. Adm. Code: that the reallocation of BOD₅ WLAs accommodates production increases that have occurred at the Mosinee Mill, and provides some relief from current waste load allocations, which the Mosinee Mill's wastewater treatment facility is unable to continuously meet.

Chapter NR 212, Wis. Adm. Code, became effective October 1, 1981 and BOD₅ WLAs have been used to calculate permit limitations in the Mosinee Mill's WPDES permit since July 1, 1983. Pursuant to s. NR 212.60(1)(e), Wis. Adm. Code, BOD₅ wasteload was allocated to the Mosinee Mill based on the Mill's 1973 pulp and paper production

rates. Since 1973, the Mosinee Mill has increased production. For example, during the period from 1979 to 2010, the Mill's production rates of unbleached kraft pulp increased from 191 tons per day to 275 tons per day and paper production increased from 268 tons per day to 320 tons per day.

The Mosinee Mill must comply with its BOD₅ WLAs during the months of May through October (wasteload allocation season) each year. At the same time the Mill must comply with its daily maximum categorical effluent limit for BOD₅. While the reallocation of available wasteload to the Mosinee Mill will result in less restrictive BOD₅ WLAs, the Mill's categorical effluent limits for BOD₅ are not being changed.

Based on information from the WPDES permit file, comments received on the proposed reallocation, Ahlstrom's demonstration of need, and applicable Wis. Adm. Code, the department concludes that ninety percent of the BOD₅ WLAs made available with the termination of the Brokaw facility's WPDES shall be allocated to Ahlstrom's Mosinee Mill with the remaining ten percent held as reserve capacity. The department's decision on reallocation of waste load is unchanged from its original proposal.

Note that the available BOD₅ WLAs, as well as the BOD₅ WLAs currently contained in the Mosinee Mill's WPDES permit, consist of four tables of WLA values in pounds per day of BOD₅. Each table has eighteen columns for Wisconsin River temperatures and eleven rows for Wisconsin River flow rates. There is one WLA value for each combination of river flow and temperature. Prior to including reallocated BOD₅ WLA values in the Mosinee Mill's permit, the department will adjust the BOD₅ WLA values in recognition of differences in discharge locations and characteristics of the former Brokaw facility and current Mosinee Mill.

The department's decision does not address the adjustment of the BOD₅ WLA values prior to including the values in the Mosinee Mill's WPDES permit. Neither does it address the modification or reissuance of the Mosinee Mill's permit and compliance with surface water antidegradation regulations, which are necessary for the inclusion of the adjusted BOD₅ WLA values in the permit. The department will public notice the modification or reissuance of the Mosinee Mill's permit to include the adjusted BOD₅ WLAs. The public may comment on the department's methods for adjusting the BOD₅ WLA values at that time. The permit modification or reissuance must become effective before the Mosinee Mill may increase its discharge of BOD₅ during the wasteload allocation season.

Permit Drafter's Name, Address, Email and Phone: Nate Willis, Wisconsin Department of Natural Resources, 101 S. Webster St., PO Box 7921, nathaniel.willis@wisconsin.gov, Madison, WI, 53707-7921, (608) 535-2369.

Basin Engineer's Name, Address, Email and Phone: Nicholas Lindstrom, Wisconsin Department of Natural Resources, 1300 W Clairemont Ave., Eau Claire, WI 54701, Nicholas.Lindstrom@wisconsin.gov, (715) 492-1787.

Date of Department's Decision: February 22, 2024

The department has the authority to issue, modify, suspend, or terminate WPDES permits and to establish effluent limitations and permit conditions under ch. 283, Wis. Stats.

If you believe you have a right to challenge this decision made by the department, you should know that Wisconsin statutes, administrative codes and case law establish time periods and requirements for reviewing department decisions. To seek judicial review of the department's decision, s. 227.52, Wis. Stats., establishes criteria for filing a petition. Such a petition shall be filed with the appropriate circuit court and shall be served on the department. The petition shall name the Department of Natural Resources as the respondent. To request a contested case hearing pursuant to s. 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. The filing of a request for a contested case hearing is not a prerequisite for judicial review,

Information on file for this reallocation of waste load may be inspected and copied at either the above named permit drafter's address or the above named basin engineer's address, Monday through Friday (except holidays), between 9:00 a.m. and 3:30 p.m. Information on this reallocation of waste load may also be obtained by calling the permit drafter at (608) 535-2369 or by writing to the department. Reasonable costs (usually 20 cents per page) will be charged for copies of information in the file other than the public notice and this decision notice. Pursuant to the Americans with Disabilities Act, reasonable accommodation, including the provision of informational material in an alternative format, will be made to qualified individuals upon request.

NAME OF PUBLISHING NEWSPAPER: Wausau Daily Herald

ADDRESS OF PUBLISHING NEWSPAPER: PO Box 1286, Wausau, WI 54402-1286

Date Notice Issued: February 28, 2024