

Industrial WPDES Permit Drafting Information Sheet

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Date: 08/13/2014

Author: David Stertz

Revision date & reviser name:

CC:

1 General Information

Permit Number	Current WI-0057797-04 Effective Date: 1/01/2009 Expiration Date: 12/31/2013 Draft WI-0057797-05 Proposed Effective Date: 1/01/2015 Proposed Expiration Date: 12/31/2020	
Permittee Name	Lauritzen Inc.	
Flow(s)	MGD	Change during current permit term?
• Daily Maximum	Not available	N/A
• Weekly Maximum	Not available	N/A
• Monthly Maximum	Not available	N/A
• Annual Average	.3 MG per year currently, previously 1.4 MG per year. This represents a nearly 80 percent reduction in discharge volume.	Soak water has been eliminated by the used of new fiberglass pickling vessels.

2 Facility Description

Provide a description of the facility suitable for use with slight editing to be used in the public notice

Lauritzen Inc. is an on farm cucumber storage and processing operation. Approximately 110,000 bushels of cucumbers are preserved annually. This activity did result in the discharge of approximately 37000 gpd of combined wastewater to spray irrigation of agricultural fields. A significant portion of this discharge was vat soakwater. Since the issuance of the last permit, all wood pickling vats have been replaced by fiberglass pickling vats. Soakwater is no longer discharged resulting in a lower chloride discharge and a much lower volume of discharge. Previously 1.4 MG/year discharged, currently .3 MG/year.

Describe any facility upgrades/revisions/changes that have occurred during the current permit term, and proposed permit content changes

Wood pickling vats have been replaced by fiberglass. Soak water discharge has been eliminated. Corresponding groundwater chloride concentrations have dropped by over 95 percent in MW-2. Recent drops have been recorded in MW-4 and 5.

Sample Point Information

Add new sample points if necessary or indicate NA. If new, verify what the next available sample point number would be with permit drafter.

Are there any changes that should be made to the sample point description(s) that are in the current permit?
Not at this time.

Source	Sample Point Number	Average Flow/Amount/Volume, Units, and Averaging Period (during current permit term)
Influent	Not applicable	
Land Treatment	001	Consists of tank yard stormwater runoff only. Volume is estimated to be approximately .3 MG/ year.
Land Application	inactive	Currently no land application. None proposed.
Compliance Schedule(s)		

Describe any new sample points or changes in sample point descriptions here:

No changes, no new points.

3 Influent

Summarize proposed Influent Monitoring Changes from Current Permit

Influent is not monitored, no changes.

4 In-Plant

Summarize proposed In-Plant Monitoring Changes from Current Permit

Given the volume of wastewater to spray irrigation has been reduced by approximately 80 percent by the elimination of soakwater, I propose that monthly discharge monitoring be eliminated and this permit be changed to groundwater monitoring only.

5 Surface Water

Summarize proposed Surface Water Monitoring and/or Limits Changes from Current Permit

Not applicable. This is a land treatment discharge.

Requested Variances in the Next Permit Term

Chloride? Yes No NA

Mercury? Yes No NA

Phosphorus (Pond/Lagoon Systems Only)? Yes No NA

- Does the current permit include a phosphorus variance?

Other Variance(s)? Yes No

- Identify the requested variance.
- Does the current permit include such a variance?

Thermal Rule Related Items

Is the permittee required to conduct effluent temperature monitoring? Not applicable.

Phosphorus Rule Related Items

Has the permittee submitted a request for an alternative phosphorus limit (APL)? Not applicable.

- If so, does the current permit include an APL? No

Has the permittee submitted a Watershed Adaptive Management Request Form? Not applicable

Has permittee conducted P monitoring of the receiving water? Not applicable

6 Land Treatment (specify which type(s) - spray irrigation, ridge & furrow, absorption pond)

Spray irrigation from stormwater runoff from pickling vat yard and formerly vat soakwater.

Is a new, or revised Land Treatment Management Plan required? I

If elimination of discharge monitoring is effected, would recommend that a no new land treatment plan be submitted. It is clear from a review of groundwater monitoring reports that the elimination of soakwater has reduced the volume of chlorides reaching groundwater. Groundwater chloride concentrations have fallen by over 95 percent over the last permit term. Given this drop it appears that a new land treatment plan is unnecessary.

I would propose alternately that a yearly discharge volume estimate be forwarded to the Department by the facility only. Compliance with regulations can be verified by review of groundwater monitoring reports.

Land TREATMENT Management Plan differs from a Land APPLICATION Management Plan when it comes to compliance schedules in permits.

If so, specify submittal date for a compliance schedule item. Require facility submit a yearly volume estimate within 3 months of permit reissuance.

Summarize proposed Land Treatment Monitoring and/or Limits Changes from Current Permit

Elimination of monitoring of land treatment discharge. Environmental quality can be verified by groundwater monitoring.

7 Groundwater

I recommend no change from the current groundwater monitoring schedule.

8 Land Application (if new, indicate if it is liquid, sludge or by-product solids)

No land application at this facility.

Is a new or revised Land Application Management Plan required?

Not applicable.

Land APPLICATION Management Plan differs from a Land TREATMENT Management Plan when it comes to compliance schedules in permits.

If so, specify submittal date for a compliance schedule item. No longer applicable.

Summarize proposed Land Application Monitoring and/or Limits Changes from Current Permit

None.

9 Compliance Schedules

Current Permit

Does the current permit include any compliance schedules? No.

- **If so, have all requirements in the compliance schedule(s) been met?** Not applicable.
 - **If not, identify which action(s) have not been met, and provisions that have been agreed to with the permittee for meeting such action(s).**
 - **What should be continued to be included in the proposed permit as relics from the current permit?**

New Permit

Compliance Schedule(s) Anticipated to be Incorporated in the New Permit

The compliance schedule(s) shown below is/are anticipated to be included in the new permit.

None.

List any changes that should be made to the above compliance schedule(s).

None.

Other Compliance Schedules

Will the permit need to include any other compliance schedule not shown above? Not to my knowledge.

- **If so, for what purpose?**
 - **List the requirements and due dates that should be included in compliance schedule.**

Summarize proposed Compliance Schedule Changes from Current Permit

Not applicable.

10 Substantial Compliance

Is the facility in substantial compliance?

Yes.

Has the Substantial Compliance Determination been completed and saved in SWAMP Permit Documents associated with the DRAFT permit?

Yes.

11 Other Comments

Provide any other comments pertinent to permit issuance, including any potentially controversial issues about the permit or the permittee

The Long Lake Association requests groundwater chloride concentration data yearly for their annual meeting and to include in their annual report for their members. Given the proximity of the lake they have concerns for groundwater quality.

The facility has requested to have its permit eliminated as it is essentially no longer discharging wastewater. This was also requested at the time of last permit issuance and was denied. The previous compliance engineer directed the facility to eliminate its soakwater discharge as a means to eliminate the facilities need for permitting. Since last permit issuance this has been done. More discussion needs to occur on this but the positive results that have been seen with respect to groundwater quality are nothing short of outstanding. There is certainly a strong case for elimination. Currently I am recommending a groundwater monitoring permit only, my expectation is that chlorides will continue to fall. But given that this facility has already fallen into double digit chloride concentrations I don't expect the enormous drop we saw over the last permit term. I would expect continued reduction of groundwater chlorides. We can monitor groundwater for another term to verify continued improvement if we believe it's necessary or we can eliminate the permit if we deem it unnecessary. I can support either course of action.

12 Attachments & Location *(attach to this document or indicate archived location)*

None.

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Wastewater Engineer

Date: 08/22/2014

Revised:

Industrial Permit Drafting Information Sheet aka Fact Sheet blank template by Nan Jameson, revised 4-17-13