

TO: Municipal Environmental Group – Wastewater Division

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2024 YEAR-IN-REVIEW

Once again, 2024 proved to be a busy year for MEG Wastewater on the regulatory and legislative fronts. We continued our work on PFAS issues, including working with DNR regarding the agency's approach to biosolids monitoring for PFAS compounds, as well as following regulatory developments at the federal level. We also had a very busy year on the legislative front. Along with MEG members, we testified at the Legislature on bills regarding using Clean Water Fund monies to address infiltration and inflow in private laterals, the establishment of a deicing program, and funding for PFAS work through a municipal grant program.

We also continued to be active in member services in 2024. Throughout the year, we provided permit review services to 35 MEG member communities, the second highest ever with only 2018 having more permits reviewed. 2024 reviews included implementation of monitoring requirements for PFAS compounds in effluent and biosolids, phosphorus compliance options, ammonia limits, and variances. We have also continued to update our website with any new information we have found pertinent to wastewater issues.

As always, your membership and involvement in MEG has helped us to continue to play a significant role in developing Wisconsin wastewater policy. This memo is a summary of some of the most significant issues in which we were involved in 2024.

SERVING MEMBERS

1. Steering Committee Participation.

We once again experienced good participation at our MEG Steering Committee meetings in 2024 from our more than 100 member communities across the state. This past year saw Steering Committee meetings held in person (with virtual options) at different member facilities across the state. These meetings were accompanied by facility tours, which we plan to continue into 2025. We greatly appreciate the feedback over this past year from our members on our hybrid meeting format, which has enabled our continued meeting success.

2. Newsletters and Website information

We also continued to provide members with monthly updates on current issues in wastewater law and policy through our Informational Bulletins and Regulatory Updates. In 2024, we continued to add to the website: www.MEGWastewater.org. Pages include updates on PFAS, our comments on proposed DNR Rule Packages and guidance documents, and factsheets to assist members with issues, including our I&I white paper.

3. Permit Reviews

We also provided more personalized service to individual communities through our member services, particularly through our permit review service. Throughout 2024, we provided a free review for 35 MEG members (over 1/3 of our membership) of draft WPDES permits to evaluate whether the proposed permit changes were consistent with other permits and complied with applicable code requirements. These permit reviews are particularly important now that the new PFAS surface water rules are in effect and DNR is implementing biosolids monitoring for PFAS in permits. The knowledge that we gain from these reviews helps us to know what issues to address with the DNR and the Legislature. We hope it provides a valuable service to our members as well.

SHAPING PUBLIC POLICY

1. MEG HELPED SECURE USE OF CWF MONIES FOR I&I IN PRIVATE LATERALS.

In 2023, MEG was integral in the development of a bill that would add statutory language providing for use of Clean Water Fund monies to address infiltration and inflow in private laterals. Continuing into 2024, we presented testimony in support of this bill on numerous occasions alongside a number of MEG members. That testimony provided critical support to secure passage of this bill, which became law in 2024. This was a significant success that we hope will enable wastewater utilities to better address infiltration and inflow concerns in their communities. We greatly appreciate all the time and effort of our membership in helping to secure passage of this important bill.

2. MEG CONTINUED TO PLAY A PIVOTAL ROLE IN SHAPING PFAS POLICY.

Polyfluoroalkyl substances (PFAS) is a group of chemicals that emerged as contaminants of concern in 2019 and continued to be a focal point of our work through 2024, particularly at the regulatory level. We participated in meetings with DNR regarding biosolids management policy to ensure that land application of non-industrially impacted biosolids can continue across the state. We also submitted comments on DNR's new guidance on the implementation of PFOS and PFOA Minimization Plans ("PMPs"). Our comments were integral to ensuring that the guidance provides flexibility for wastewater utilities to create and implement minimization plans that are best suited to their individual needs. We also continued to sit on numerous PFAS advisory committees through 2024, including DNR's Technical and External Advisory Committees, as well as subgroups on wastewater and waste. On the national level, we continued to participate on behalf of MEG in a national PFAS receivers group, which has helped us to keep abreast of PFAS initiatives in other states and at the federal level.

3. MEG HELPED SECURE FLEXIBILITY IN NEW DISINFECTION GUIDANCE.

MEG also worked to secure flexibility in DNR's new disinfection guidance. While the guidance will likely result in some new wastewater utilities being required to implement disinfection, MEG's comments on the draft guidance helped provide flexibility in requiring disinfection. In particular, MEG was able to secure the inclusion of language that limits the frequency of extended disinfection seasons for permittees to only when there is clear evidence of regularly occurring human contact recreational activities outside of the standard disinfection season.