



February 16, 2024

Mr. Brian Churchill, Environmental Scientist  
Division of Water Resources  
Department of Natural Resources and Environmental Control  
Surface Water Discharges Section  
Post Office Box 1401  
Dover, Delaware 19901-1401

Subject: *Permit Application for Renewal of DM 1906-WI-03*

Mr. Churchill:

The Milwaukee Metropolitan Sewerage District (District) is submitting the enclosed materials as an application for a permit to market and distribute Milorganite®, its exceptional quality “EQ” biosolids product, in Delaware.

The following are enclosed.

1. Application for a Permit to Distribute and Market Wastewater Sludge in Delaware;
2. Milorganite® Operations Plan and Manufacturing Process, as required by 7 Del. Adm. Code 7103-120.0 and 7103-141.0.
3. A summary of sample results for 2023 demonstrating compliance with 7 Del. Adm. Code 7103-141.1;
4. A sampling frequency table in accordance with 7 Del. Adm. Code 7103-120.4 and 7103-141.2;
5. Reports showing sample results for October, November, and December 2023 for fecal coliform, metals, nutrients, and solids demonstrating compliance with 7 Del. Adm. Code 7103-141.1;
6. A report showing priority pollutant sample results from September 2023;
7. Reports showing PCB Aroclors for October, November, and December 2023, demonstrating compliance with 7 Del. Adm. Code 7103-141.1;
8. Reports showing PFAS sample results for various analytes in 2019, 2020, 2021, 2022 and 2023, as requested.
9. Current packaging and proof of registration for the three products registered as fertilizers with the Delaware Department of Agriculture (5, 32 and 50 pound bags of Milorganite®) as required by 7 Del. Adm. Code 7103-120.5-120.6;

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Distribution directly to Delaware is rare. However, distribution to Delaware may differ from actual retail sales in Delaware. The distribution process has multiple steps. The District tracks transfers between the District and its wholesalers. The subsequent steps may include distribution to national retailers, such as Home Depot and Lowes. However, exact quantities and inventory locations are beyond the District's knowledge and control.

Additional information is available at [www.milorganite.com](http://www.milorganite.com). If you have questions, please contact me at 414-225-2080 or [evanderaa@mmsd.com](mailto:evanderaa@mmsd.com).

Sincerely yours,



Emily T. Van Deraa  
Senior Staff Attorney

Enclosures