



PUBLIC WORKS COMMISSION MEETING AGENDA

TUESDAY, JUNE 23, 2026 AT 5:30 PM

**COUNCIL CHAMBERS, SECOND FLOOR, MUNICIPAL BUILDING - 106 JONES STREET,
WATERTOWN, WI 53094**

1. CALL TO ORDER

2. COMMENTS AND SUGGESTIONS FROM CITIZENS PRESENT

Each individual who would like to address the Committee will be permitted up to three minutes for their comments

3. REVIEW AND APPROVE MINUTES

A. Public Works minutes from May 26, 2026

4. BUSINESS

A. Review and take possible action: Authorize execution of Task Order No. 26-01 with Strand Associates, Inc. for Water Utility Supervisory Control and Data Acquisition (SCADA) Computer Upgrades

B. Review and take possible action: Authorize participation in the 2026 Focus on Energy Water Treatment Strategic Energy Management (SEM) Cooperative Program

C. Review and take action: Wastewater Department, approve re-issuance of the Industrial Wastewater Discharge Permits as listed below

5. ADJOURNMENT

Persons requiring other reasonable accommodations for any of the above meetings, may contact the office of the City Clerk at cityclerk@watertownwi.gov phone 920-262-4000

A quorum of any City of Watertown Council, Committee, Board, Commission, or other body, may be present at this meeting for observing and gathering of information only

PUBLIC WORKS COMMISSION

Tuesday, May 26, 2026

5:30 p.m.

The Public Works Commission met at the above date and time. The following members were present: Alderpersons Ken Berg, Myron Moldenhauer, Gina Nitecki, and Tony Arnett. Absent: Citizen member Pete Thompson. Also present: City Staff Andrew Beyer, Tim Hayden.

1. **Call to order.** Chairperson Arnett called the meeting to order at 5:55 p.m. (Prior Finance Committee meeting ran late.)
2. **Comments and Suggestions from Citizens Present.** - None.
3. **Review and take possible action. Minutes of PWC meeting of May 12th, 2026.** Mr. Moldenhauer moved to approve the minutes as submitted, seconded by Mr. Berg. Motion carried by unanimous voice vote.
4. **Review and take possible action: Approve and award Well #9 rehabilitation project to Municipal Well & Pump** – This is standard maintenance. 2 bids were received. Mr. Berg moved to recommend the bid to Council, seconded by Ms. Nitecki. Motion carried by unanimous voice vote.
5. **Review and take possible action: Award 2028 Downtown Main Street Reconstruction Professional Real Estate Services Contract** - This contract is for services to negotiate and secure the temporary property easements required for the Main Street Reconstruction project. These costs will be reimbursed by the State. Two proposals were received. MSA Professional Services ranked higher in the Quality-Based Selection (QBS) and was also the lower cost. Mr. Moldenhauer moved to recommend the report to Council and Ms. Nitecki seconded. Motion carried by unanimous voice vote.
6. **Review and take possible action: Sidewalk Repair Orders for 404 N. Second Street, 131 Riverlawn Avenue, 139 Riverlawn Avenue, 143 Riverlawn Avenue, 210 Riverlawn Avenue, and 211 Riverlawn Avenue** – One location was based on citizen complaint. The other locations were found during tree removal. Mr. Moldenhauer moved to recommend the report to Council and Ms. Nitecki seconded. Motion carried by unanimous voice vote.
7. **Adjournment.** Mr. Arnett moved to adjourn, seconded by Mr. Berg. Motion carried by unanimous voice vote at 6:09 p.m.

Respectfully submitted,

Tony Arnett, Chairperson

Note: These minutes are uncorrected, and any corrections made thereto will be noted in the proceedings at which these minutes are approved.



Water Systems

800 Hoffmann Drive • P.O. Box 477 • Watertown WI 53094-0477
WASTEWATER (920) 262-4085 • WATER (920) 262-4075

To: Chairman Arnett, & members of the Public Works Commission **Date:** June 17, 2026
Re: Water Utility SCADA Computer Upgrade and Professional Engineering Services Agreement
with Strand Associates, Inc.

From: Peter Hartz Water Systems - Water Utility

Review and take possible action: Authorize execution of Task Order No. 26-01 with Strand Associates, Inc. for Water Utility Supervisory Control and Data Acquisition (SCADA) Computer Upgrades.

Background: Over the past two years, Water Systems has undertaken a significant modernization effort of the Wastewater Utility's information technology and SCADA infrastructure. During that project, several cybersecurity vulnerabilities and system resiliency concerns were identified. To address these concerns, the city engaged Strand Associates, Inc. to review the proposed network architecture and cybersecurity measures associated with the wastewater system upgrades following and under the on-demand service agreement in place.

Through that review process, Strand Associates provided valuable technical guidance regarding industry best practices for cybersecurity, system redundancy, backup procedures, and SCADA infrastructure protection. Their review also identified deficiencies in the original implementation approach and resulted in recommendations that were incorporated to strengthen the City's security posture and improve reliability of wastewater utility systems.

As part of their evaluation, Strand Associates also reviewed the Water Utility's SCADA environment and identified several areas where system improvements should be made. The existing Water Utility SCADA computers are approaching the end of their useful life and are no longer compatible with the needed Windows 11 upgrades needed for SCADA operating system, and present increasing concerns related to hardware reliability, software support, cybersecurity, and disaster recovery capabilities.

The Water Utility SCADA system is considered critical infrastructure and serves as the primary platform for monitoring and controlling water treatment, pumping, storage, and distribution operations throughout the utility. Reliable operation of these systems is essential to maintaining continuous water service, protecting public health, ensuring regulatory compliance, and responding effectively to system alarms and operational events. As technology ages, replacement parts become more difficult to obtain, software compatibility becomes increasingly limited, and cybersecurity risks increase due to outdated operating systems and unsupported hardware.

Task Order No. 26-01 authorizes Strand Associates to assist the Water Utility with procurement, installation, configuration, and commissioning of three replacement computers, backup software, and associated SCADA software upgrades. Services include installation of existing AVEVA software and licenses on replacement SCADA computers, installation and configuration of Veeam backup software, updating InTouch software to Version 2023 R2, and providing onsite implementation support. The project will also improve system backup and recovery capabilities while providing a more secure and supportable platform for future operations. Work is anticipated to begin in July 2026 and be completed by December 31, 2026.

Staff recommends continuing to utilize Strand Associates for this work because of their familiarity with the City's existing SCADA environment, their involvement in the wastewater cybersecurity review, and their demonstrated expertise in utility control systems, cybersecurity, and critical infrastructure protection.

Budget Goal:

Maintain reliable and secure operation of critical Water Utility infrastructure while protecting utility assets and reducing cybersecurity and operational risks.

Fiscal Impact:

The proposed task order provides professional engineering and SCADA integration services for a lump-sum cost of \$14,000. Hardware purchases, including replacement SCADA computers and backup equipment, will be procured separately through approved purchasing procedures and are budgeted within the Water Utility capital and equipment replacement program.

Recommendation:

Staff recommends approval of Task Order No. 26-01 with Strand Associates, Inc. in the amount of \$14,000 for professional services associated with the Water Utility SCADA Computer Upgrade project.

Suggested Motion:

Move to approve Task Order No. 26-01 with Strand Associates, Inc. for Water Utility SCADA Computer Upgrade services in the amount of \$14,000 and authorize the Mayor and City staff to execute the agreement.

Attachments:

1. Strand Associates Task Order No. 26-01
2. SCADA Computer Equipment Specifications

Respectfully submitted,

Peter Hartz
Water Systems Manager



Transmittal Letter

DATE: May 29, 2026 PROJECT NO. 1550.014

COMPANY NAME: City of Watertown
 ATTENTION: Peter Hartz, Water & Wastewater Utilities Manager
 ADDRESS: 800 Hoffman Drive
PO Box 477
 CITY/STATE/ZIP: Watertown, WI 53094
 RE: Water SCADA Upgrade Agreement for Signature

WE ARE SENDING YOU:

- | | | | | |
|---|-----------------------------------|-----------------------------------|----------------------------------|---|
| <input checked="" type="checkbox"/> Agreement | <input type="checkbox"/> Contract | <input type="checkbox"/> Letter | <input type="checkbox"/> Report | <input type="checkbox"/> Shop Drawings |
| <input type="checkbox"/> Change Order | <input type="checkbox"/> Drawings | <input type="checkbox"/> Pay Apps | <input type="checkbox"/> Samples | <input type="checkbox"/> Specifications |
| <input type="checkbox"/> Other _____ | | | | |

Copies	Date	No.	Description
2	5/2026	26-01	Task Order 26-01

ITEMS TRANSMITTED AS SHOWN:

- | | | |
|---|---|--|
| <input type="checkbox"/> For approval | <input type="checkbox"/> Approved as submitted | <input type="checkbox"/> Resubmit ____ copies for approval |
| <input type="checkbox"/> For your use | <input type="checkbox"/> Approved as noted | <input type="checkbox"/> Submit ____ copies for distribution |
| <input type="checkbox"/> As requested | <input type="checkbox"/> Approved as noted-Resubmit | <input type="checkbox"/> Additional Information Required |
| <input type="checkbox"/> For review and comment | <input type="checkbox"/> Not Approved | <input checked="" type="checkbox"/> For signature |
| <input type="checkbox"/> Other _____ | | |

REMARKS:

Pete-
 Please get these Task Orders signed and return both to me. I will have Joe sign and return your copy to you.
 Thanks!

Signed 
 Jason Carden, P.E.

Copy to: File



Task Order No. 26-01
City of Watertown (OWNER)
and Strand Associates, Inc.® (ENGINEER)
Pursuant to Agreement for Technical Services dated July 2, 2020

Project Information

Services Name: Water Utility Supervisory Control and Data Acquisition (SCADA) Computer Upgrade

Scope of Services

ENGINEER will provide the following services to OWNER:

1. Assist OWNER with ordering three desktop computers for direct OWNER purchase.
2. Assist OWNER with ordering Veeam backup software for direct OWNER purchase.
3. Install and configure Veeam backup software on one new OWNER-provided backup computer.
4. Install OWNER’s existing Aveva software, licenses, and related drivers on two new OWNER-provided SCADA computers.
5. Install OWNER’s existing Water Information Management Solution client software on one new OWNER-provided SCADA computer.
6. Update existing Intouch software application to version 2023 R2.
7. Provide one site visit to install the new SCADA and backup computers.

Compensation

OWNER shall compensate ENGINEER for Services under this Task Order a lump sum of \$14,000.

Schedule

Services will begin upon execution of this Task Order, which is anticipated the week of June 1, 2026. Services are scheduled for completion on December 31, 2026.

TASK ORDER AUTHORIZATION AND ACCEPTANCE:

ENGINEER:
STRAND ASSOCIATES, INC.®

OWNER:
CITY OF WATERTOWN, WISCONSIN

Joseph M. Bunker
Corporate Secretary

Date

Robert Stocks
Mayor

Date



Task Order No. 26-01
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and Strand Associates, Inc.® (ENGINEER)
Pursuant to Agreement for Technical Services dated July 2, 2020

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CITY OF WATERTOWN, WISCONSIN

Joseph M. Bunker
Corporate Secretary

Date

Robert Stocks
Mayor

Date



[Dell UltraSharp 27 Monitor - U2724D](#)

Dell UltraSharp 27 Monitor - U2724D

Warranty & Support

Standard Hardware Support Service
3Y Basic Hardware Service with Advanced Exchange after remote diagnosis

Warranty & Support

Includes a 3Y Basic Hardware Service with Advanced Exchange after remote diagnosis
Upgrade to 3Y ProSupport with Advanced Exchange after remote diagnosis



[Dell Pro Max Slim Desktop](#)

Dell Pro Max Slim FCS1250Dell Pro Max Slim (FCS1250) CTO Base

ProcessorIntel® Core™ Ultra 5 235 (24 MB cache, 14 cores, 14 threads, 2.9 GHz to 5.0 GHz, 65W)

Operating SystemWindows 11 Pro

KeyboardDell Pro Compact Silent Keyboard and Mouse - KM555 - US English

MouseMouse included with Keyboard

GraphicsIntel Integrated Graphics

Memory 32GB: 2 x 16 GB, DDR5, 5600 MT/s, non-ECC

1st Storage 1 TB, M.2 2230, TLC PCIe Gen4, SSD

2nd Storage Additional 1 TB SSD TLC M.2 2230 PCIe Gen4

Storage Configuration (Boot Drive)Storage Config C2, 2230 boot + 2230

Hard Drive Cables and Brackets No Caddy

Raid Connectivity RAID 1 for M.2 NVMe SSD

Wireless No Wireless LAN Card

Systems Management Intel vPro Enterprise

System Monitoring Options Watch Dog SRV

ENERGY STAR ENERGY STAR Qualified

Power Cord System Power Cord C13 (US 125V, 15A)

Documentation/Disks Documentation

Driver No Wireless LAN

Packaging Shipping Material for DAO

FGA Module No FGA

Cables and Dongles No Accessories

Placemat Quick Setup Guide

Chassis Options Dell Pro Max Slim with 360W (80 Plus Platinum) PSU (no system fan),
DAO

Network Card Intel i226 Network Card Low-Profile

TAANo Federal Order

CD ROM/DVD ROM No Optical Drive

UPC Label No UPC Label

TPM Security Dell Precision / Pro Max Desktops TPM

Thermal Cooling 65W CPU Air Cooler

Optional USB and Video Ports No Additional Port

Stands and Mounts No Stand

PCIe I/O Add-in-cards Not selected in this configuration

Intel Responsiveness Technologies Intel Rapid Storage Technology Driver

Processor Branding Intel® Core™ Ultra 5 vPro Processor Label

EPEAT EPEAT Gold with Climate+

Storage Controllers Integrated Intel SATA Control

Label FSJ Regulatory Label, 360W Platinum

Fans No Fans Included

4th Storage No Hard Drive

3rd Storage No Hard Drive

Serial Port/PS2 Adapter Not selected in this configuration

Additional Storage Devices - Media Reader No SD Card Reader

Windows AutoPilot No AutoPilot

Microsoft Office Microsoft Office Home & Business 2024

View less

Software & Services

Operating System Language Pack English, French, Spanish, Brazilian Portuguese

Optical Software CyberLink Media Suite Essentials for Windows OS and DVD Drive (without Media)

Non-Microsoft Application Software Dell Pro Max Slim FCS1250

Home and Small Business Security: Identity and Anti-Virus None

Operating System Recovery Options OS-Windows Media Not Included

Warranty & Support

Standard Hardware Support Service Basic Onsite Service after remote diagnosis with Hardware-Only Support 12 Months, 12 Month(s)

Hardware Support Services Upgrades ProSupport Plus with ProSupport and AD and KYHD with Technical Customer Success Mgr, 60 Month(s)



Water Systems

800 Hoffmann Drive • P.O. Box 477 • Watertown WI 53094-0477
WASTEWATER (920) 262-4085 • WATER (920) 262-4075

To: Tony Arnett, and members of the Public Works Commission
2026

Date: June 15,

From: Peter Hartz, Water Systems Manager

Re: Focus on Energy Water Treatment Strategic Energy Management (SEM) Cooperative Enrollment

Water Systems: Water Utility

Review and take possible action: Authorize participation in the 2026 Focus on Energy Water Treatment Strategic Energy Management (SEM) Cooperative Program.

Background:

Focus on Energy has invited Wisconsin water treatment facilities to participate in the 2026 Water Treatment Strategic Energy Management (SEM) Cooperative. The program is designed to help water utilities reduce energy consumption through a structured energy management process that includes energy-use analysis, technical assistance, peer collaboration, educational workshops, and identification of operational efficiency opportunities.

Participation includes development of an energy performance model using facility energy and production data, attendance at five virtual workshops, monthly progress meetings, and an on-site energy assessment conducted by Focus on Energy technical experts. The program emphasizes low- and no-cost operational improvements while also identifying potential capital projects that may reduce energy consumption.

Participating utilities are eligible to receive incentives of \$0.02 per kilowatt-hour (kWh) and \$0.20 per therm saved through verified energy improvements, with incentives capped at \$50,000 over a 12-month period.

Staff believes participation will provide valuable insight into utility energy use, identify cost-saving opportunities, and support ongoing efforts to improve operational efficiency while reducing operating costs.

Budget Goal:

Support efficient operation of the Water Utility by reducing energy consumption and operating costs while pursuing available external funding and incentive opportunities.

Fiscal Impact:

There is no direct participation fee identified for the program. Staff time will be required to provide historical energy data, attend workshops and meetings, and implement identified energy-saving measures. Participation may generate incentive payments of up to \$50,000 based on verified energy savings achieved through the program.

Recommendation:

Staff recommends approval to enroll the Water Utility in the 2026 Focus on Energy Water Treatment Strategic Energy Management Cooperative and authorize staff to complete the enrollment process and participate in the program.

Respectfully submitted,

Peter Hartz

Water Systems Manager

Attachments:

1. Focus on Energy Water Treatment Strategic Energy Management Cooperative Program Overview
2. Focus on Energy SEM Enrollment Application
3. Focus on Energy Program Terms and Conditions

Focus on Energy Program Terms and Conditions

General Tribal Nations IRA Home Energy Rebate Programs

Uniform Application Terms & Conditions

Focus on Energy is Wisconsin utilities' statewide energy efficiency and renewable resource program ("FOCUS ON ENERGY®" or "the Program") and makes available incentives, discounts, rebates, rewards ("Incentives"), and other program offerings (each a "Program" and collectively "Programs") to eligible Program participants ("Participants"). A Participant refers to someone who submits an application to Focus on Energy or places an order through the Focus on Energy marketplace (an "Application"), and in doing so has agreed to the Uniform Application Terms and Conditions (the "Terms & Conditions"). Focus on Energy and the Participant may be individually referred to herein as a "Party" and collectively as the "Parties".

Aptim Government Solutions, LLC ("Administrator") is the contractor hired by the Statewide Energy Efficiency and Renewable Administration, Inc. ("SEERA") to administer Focus on Energy. Except where explicitly stated otherwise, "Focus on Energy" shall refer to the Administrator in its capacity as the responsible party for administering the Program and shall also include any of Administrator's implementers or subcontractors assisting with the administration and implementation of the Programs.

Participant expressly agrees to be bound by the following Program requirements:

Section 1. Participant Eligibility: A Participant must be the account holder for the energy services provided by a participating electric or natural gas utility at the project site where the energy-efficient or renewable energy technology will be installed or service performed. Participants can transfer their eligibility to a third party.

Project sites served by a participating electric utility but not a participating natural gas utility will only qualify for incentives for electric technologies. Sites served by a participating natural gas utility but not a participating electric utility will only qualify for incentives for natural gas technologies. Sites with a qualifying electric utility and qualifying natural gas utility will qualify for incentives on both electric and natural gas technologies. Project sites using Liquid Propane (LP) or other non-qualifying fuels will not qualify for incentives on technologies exclusively saving gas.

Some Focus on Energy participating electric and/or natural gas utilities have incentive programs independent of Focus on Energy. Participant should check with their electric and/or natural gas utilities to verify eligibility rules for any utility-sponsored programs.

Section 2. Marketing: The Participant shall not use Focus on Energy’s name (“FOCUS ON ENERGY®”), logo, identity, any affiliation, or any related logo, for any marketing, advertising, or solicitation without prior written consent of Focus on Energy, which shall only be granted after Focus on Energy’s review and approval of the proposed marketing materials.

Focus on Energy reserves the right to publicize the Participant’s participation in the Program, unless a written request to maintain confidentiality of Participant’s participation is submitted to marketing@focusonenergy.com no later than fifteen (15) days after receiving Program Payment. Such right to publicize by Focus on Energy is part of Participant’s consideration for participation in the Focus on Energy Program. For purposes of the foregoing, to the extent applicable, Participant grants Focus on Energy a nonexclusive irrevocable license to Participant’s name and logo, solely for the purpose of publicizing Participant’s participation in the Program. Participant does not have the right to revoke such license unless explicitly granted in writing by Focus on Energy.

Section 3. Program Payments: Monetary incentives, rebates, or discounts from Focus on Energy constitute “Program Payments” hereunder. Program Payments shall be available to eligible Participants according to the terms and participation requirements for the applicable Program and related Application. The acceptance and approval of an Application is determined solely by Focus on Energy. Receipt of a completed Application does not guarantee a Program Payment. In some cases, there may be additional participation requirements for certain Programs or applications.

Program Payments are available on a first-come, first-served basis. Focus on Energy shall be under no obligation to make any payments to a Participant if SEERA does not provide the funds to Focus on Energy for this purpose or if Focus on Energy is not under contract with SEERA for this purpose.

In order for the Participant to receive a Program Payment, the below requirements must be met:

1. Products must be purchased and installed within the date range outlined in the Application or Incentive Agreement. An Incentive Agreement is the

agreement between the Participant and Focus on Energy outlining the terms of the applicable custom incentive.

2. Custom incentives must be pre-approved in writing by Focus on Energy prior to equipment being purchased, ordered, or installed.
3. Applications must be postmarked within the number of calendar days reflected on the Application.
4. Participant must provide Focus on Energy with invoices for equipment purchased or service performed, as well as documentation verifying the renewable and/or energy efficiency measures, (1) have been properly installed, (2) are functioning properly, and (3) have the potential to generate energy savings if properly maintained and operated. Purchase orders, proposals and quotes are not considered proof of purchase. A Project Completion Notice must also be submitted for all custom incentives.
5. All projects shall comply with federal, state, and local regulations.
6. All equipment must be new; used or rebuilt equipment is eligible only when requested by Participant and approved in writing by Focus on Energy advance of purchase. Displaced equipment must be removed and cannot be sold and/or re-installed at another site.
7. Equipment purchased under a capital lease structure may qualify for a Program Payment but must be approved by Focus on Energy in writing prior to project initiation or the execution of any equipment lease.
8. Participant agrees to refund Focus on Energy some or all the Program Payment received if Focus on Energy determines, at Administrator's sole discretion, the Participant has misrepresented any Application information or if Participant uninstalls the equipment within two years from installation.

Program Payments must be paid to the Participant unless there is (1) written authorization from the Participant to pay a third-party directly or (2) the Participant received a credit on their invoice from a registered Trade Ally contractor, who is able to receive direct payment Focus on Energy. Participant is entitled to one payment per project measure. If the Participant or its representative receives duplicate payment of a project measure, Focus on Energy reserves the right to recover any excess payments. If equipment is removed prior to two (2) years from the date of Program Payment, Participant is required to return 100% of the Program Payment to Focus on Energy.

Focus on Energy has the sole discretion to determine if Participant's compliance with these requirements has been met. Participants should maintain a copy of their Application for their records. Incomplete Applications may be returned for correction and will not be processed until deemed complete by Focus on Energy.

Section 4. Right to Discontinue Program, Terminate or Withhold Payment:

1. Focus on Energy reserves the right to change or discontinue any Program at any time without notice.
2. Focus on Energy reserves the right to withhold or terminate Program Payments if:
 - An identified problem with a project is not resolved due to a Participant's failure to follow any and all applicable Terms and Conditions, requirements, or procedures; or
 - Focus on Energy determines Participant's receipt of Program Payment will not result in the implementation of the energy efficiency or renewable energy projects by Participant, or if the project(s) will not result in the reduction of energy usage or generation of renewable energy; or
 - The Participant becomes "Insolvent" (which shall mean Participant (a) files a petition or otherwise commences, authorizes or acquiesces in the commencement of a proceeding or cause of action under any bankruptcy, insolvency, reorganization or similar law, including but not limited to the United States Bankruptcy Code or the laws of any state, or has any such petition filed or commenced against it; (b) makes an assignment or any general arrangement for the benefit of creditors; (c) otherwise becomes the subject of a bankruptcy proceeding or insolvent (however evidenced); (d) has a liquidator, administrator, receiver, trustee, conservator or similar official appointed with respect to it or any substantial portion of its property or assets; or (e) is generally unable to pay its debts as they fall due).

Section 5. Disclaimers, Representations, and Warranties: Focus on Energy, the Administrator, the Public Service Commission of Wisconsin, and SEERA (collectively for this section referred to as "Focus on Energy") do not endorse any particular Trade Ally, manufacturer, product, system, or design by offering a Program Payment. Focus on Energy is not responsible for any tax liability imposed on the recipient as a result of Program Payment. FOCUS ON ENERGY MAKES NO REPRESENTATION OR WARRANTY, AND ASSUMES NO LIABILITY WITH RESPECT TO THE QUALITY, SAFETY, PERFORMANCE, OR OTHER ASPECT OF ANY DESIGN, CONSULTING, PRODUCT, SYSTEM, EQUIPMENT, OR APPLIANCE INSTALLED OR RECEIVED AND EXPRESSLY DISCLAIMS ANY SUCH REPRESENTATIONS, WARRANTIES, AND LIABILITY, INCLUDING, BUT NOT LIMITED TO, ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. Focus on Energy does not guarantee installation

and operation of incentivized measures will result in reduced energy usage or in cost savings. Focus on Energy is not responsible for the proper disposal/recycling of any waste generated as a result of this project. FOCUS ON ENERGY IS NOT LIABLE UNDER ANY CIRCUMSTANCES FOR ANY DAMAGES, INCLUDING ANY DIRECT, INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES, ARISING OUT OF THE OPERATION OR MALFUNCTION OF THE PRODUCTS, EQUIPMENT, OR APPLIANCES, OR THE INSTALLATION THEREOF.

Section 6. Monitoring, Verification, Record Keeping, and Right to

Inspect: The Participant and its subcontractors shall maintain accurate records of the project work (e.g., installation records, invoices, and maintenance information) performed hereunder for a period of two (2) years from the date of a Program Payment. Focus on Energy evaluates Program efficacy by monitoring energy use/production prior to and after installation of energy efficiency or renewable energy projects. Focus on Energy, and its designated representatives, shall have the right to:

- Monitor energy use/production prior to and after installation of a project;
- Verify Participant is/was a customer of a participating utility at the time of project completion;
- Perform an inspection of project records or the project itself to evaluate Program efficacy for a period of two (2) years from the date of Program Payment;
- Withhold or terminate current or future payment for failure to allow for a post-installation inspection; and
- Seek reimbursement for up to 100% of the Program Payment if inspection identifies equipment is not installed or functioning in a manner which reduces energy usage as expected.

The Participant's signature on an Application constitutes the Participant's consent (1) for their electric and/or natural gas utility to disclose the Participant's energy usage data directly to Focus on Energy and (2) for Focus on Energy to disclose Participant's energy usage data via energy reports to their energy service provider. If the Participant does not want their project information shared with their energy service provider, the Participant may opt out at any time by emailing Focus on Energy at operations@focusonenergy.com.

Section 7. Indemnification: Participant shall protect, indemnify, defend, and hold harmless Focus on Energy, Program Administrator, SEERA, the State of Wisconsin and participating utilities, their respective affiliates, subsidiaries, parent companies, officers, directors, agents, and employees ("Indemnified

Parties”), against any and all losses, damages, expenses, fees, costs, including reasonable attorneys’ fees, and liability (“Losses”) arising from or in any way connected with any program, design, consulting, product, system, equipment, or appliance, unless such Losses arise out of the gross negligence or intentional misconduct of an Indemnified Party. This indemnification obligation shall include, but not be limited to: (a) Participant’s breach of any obligations under these Terms and Conditions; (b) personal injury, death, or tangible property damage in connection with the Program or this Agreement; or (c) Participant’s negligence, willful misconduct, or violation of any applicable law, regulation, rule, court order or breach of any obligation to a third party in connection with the Program or this Agreement.

The Participant agrees its indemnification obligations under this Section shall survive any expiration or termination of the Application and shall not be limited by any enumeration herein of required insurance coverage. To the maximum extent permitted by law, the Participant agrees to limit Focus on Energy’s liability to the Participant for any reason to the total amount of the payments identified in this Agreement. This limitation shall apply regardless of the cause of action or legal theory pled or asserted.

Section 8. Misrepresentation: Making false statements on any Focus on Energy Application or order is punishable by law. Any person who knowingly submits an Application containing any materially false information or who purposely and misleadingly conceals information commits a fraudulent act subjecting such person to criminal and civil penalties. Fraudulent activities include, but are not limited to:

- Applicants misrepresenting eligibility of a project site and/or qualifying utility services
- Applicant falsely representing another party on a Program Application
- Products not installed as stated on Program Application
- Product quantities and/or make and model not matching Program Application
- Products not installed or services not completed at the site specified on the Program Application

Participant hereby agrees and acknowledges any Program Payments determined, in Focus on Energy’s sole discretion, to have been acquired by Participant because of fraudulent or misrepresented information will be fully and immediately returned to Focus on Energy. This section shall not limit other

remedies available to Focus on Energy arising from Participant filing a false or fraudulent Application.

Section 9. Miscellaneous:

Governing Law; Submission to Jurisdiction. All matters arising out of or relating to all Applications, orders, and Incentive Agreements and these Terms and Conditions shall be governed, construed, and enforced in accordance with the internal laws of the State of Wisconsin, without regard to any conflicts of laws principles directing the application of the laws of another jurisdiction. The Participant irrevocably submits to the original jurisdiction of the state and federal courts sitting in Madison, Wisconsin with regard to any controversy in any way relating to the execution, delivery or performance of an Application, Incentive Agreement, or these Terms and Conditions. Suits, claims or actions founded upon such controversies shall be brought or filed exclusively in such courts and nowhere else. The exclusive venue for any dispute or controversy arising under an Application, Incentive Agreement, or these Terms and Conditions shall be the Dane County, Wisconsin Circuit Court, or the Federal District Court for the Western District of Wisconsin.

Compliance with Applicable Laws. The Participant shall at all times comply with and observe all federal and Wisconsin state laws and published circulars, local laws, ordinances, rules and regulations which are in effect from the time at which Participant submits an Application or enters into an Incentive Agreement to Participant's receipt of a Program Payment, and which in any manner affect the performance of an Application or Incentive Agreement. All references to statutes or regulations contained in any Application, order, Incentive Agreement, or these Terms and Conditions shall be construed to include successors thereto.

Assignment. Focus on Energy may assign, transfer, or convey any Application or any of Focus on Energy's rights, obligations, interests, or responsibilities thereunder, in whole or in part, without the consent of the Participant. Neither an Application nor any rights or obligations hereunder or thereunder may be sold, assigned, transferred or otherwise disposed of by Participant, whether pursuant to a change of control, by operation of law or otherwise, without Focus on Energy's prior written consent. Any purported assignment by Participant of this section is null and void.

Severability. If any provision of any Application, Incentive Agreement or these Terms and Conditions is construed by a court of competent jurisdiction to be illegal, invalid, or unenforceable under present or future laws, that provision

shall be fully severable and the Application, Incentive Agreement and these Terms and Conditions shall be construed and enforced as if the illegal, invalid, or unenforceable provision had never comprised a part thereof. Furthermore, in lieu of such illegal, invalid, or unenforceable provision, the Application, Incentive Agreement and these Terms and Conditions shall be reformed to include as a part of the Application, Incentive Agreement and these Terms and Conditions a provision as similar in terms to the illegal, invalid, or unenforceable provision as may be possible and still be legal, valid, or enforceable.

Risk of Loss. The Focus on Energy Parties at no time assumes risk of loss for any personal property of the Participant.

Waiver. No waiver by Focus on Energy of any of the provisions of any Application, order, Incentive Agreement, or these Terms and Conditions shall be effective unless explicitly set forth in writing and signed by an authorized representative of Focus on Energy. Failure or delay on the part of either party to exercise any right, power, privilege, or remedy hereunder shall not constitute a waiver thereof. A waiver of any default shall not operate as a waiver of any other default or of the same type of default on a future occasion.

Authority. Each Party represents that the individuals entering into any Application and Incentive Agreement on its behalf has full right, power and authority to enter into and perform such Application and Incentive Agreement.

Revised 4/17/26

2026 BUSINESS OFFERINGS

WATER TREATMENT STRATEGIC ENERGY MANAGEMENT COOPERATIVE



WHAT YOU SHOULD KNOW

NEED HELP? CALL 800.762.7077

The Water Treatment Strategic Energy Management (SEM) Cooperative helps facilities use less energy in their daily operations. As participants, water treatment facilities will:

- Gain a better understanding of their energy use and how to manage it.
- Engage in peer learning opportunities with other Cooperative participants.
- Work with Technical Experts to plan energy-saving projects and learn how to overcome challenges during implementation.

UNDERSTANDING SEM

SEM is a long-term approach to managing energy use. It includes setting goals, tracking progress, and reporting results. Customers receive an energy model showing how different factors affect energy use using daily or monthly data. Customers can earn financial incentives for verified energy improvements from SEM, which are not otherwise eligible for FOCUS ON ENERGY® rebates and incentives.



WORKSHOPS

Learn from Technical Experts and peer participants in a series of virtual workshops. Topics include energy basics, common strategies, and reporting on SEM progress.



PROJECTS

Work with Technical Experts to identify opportunities for cost-effective equipment upgrades. Focus on low- and no-cost energy-saving actions to implement immediately.



COACHING

Receive technical support, peer collaboration, and proven processes to help you succeed.

WHY PARTICIPATE?

- Access to technical support and educational opportunities.
- Energy performance model and tracking tools.
- Energy management development support.
- Energy savings of up to 10%. Additional incentives for implemented projects of \$0.02/kWh saved and \$0.20/therm saved.

BENEFITS

<p>1</p> <p>ENERGY MODEL</p> <ul style="list-style-type: none"> • Tracking, reporting, and updating of energy performance information. • Model updates throughout the year. • Integrated energy use and system production. 	<p>2</p> <p>WORKSHOPS</p> <ul style="list-style-type: none"> • Topics include: <ul style="list-style-type: none"> • Energy basics. • Common inefficiencies in water treatment. • In-depth training on energy models. • Persistence strategies through project implementation. 	<p>3</p> <p>TREASURE HUNT</p> <ul style="list-style-type: none"> • Technical Experts will visit each facility to identify upgrades. 	<p>4</p> <p>COACHING</p> <ul style="list-style-type: none"> • Technical Experts will hold regular check-in calls during the year. They will review your progress and answer questions.
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step 1**BEFORE YOU APPLY:**

- 0 Confirm your gas and/or electric utility participates in Focus on Energy at focusonenergy.com/utilities.
- 0 Contact your Energy Advisor for assistance. If you do not know who your Energy Advisor is, call **800.762.7077**.

step 2**WHAT YOU'LL NEED:**

- 0 SEM Enrollment application (all sections of this form must be completed).
- 0 Identified Executive Sponsor and Energy Champion.
 - Executive Sponsor – The highest-level manager available at the facility (typically the facility manager) who is responsible for ensuring the Energy Team has the resources it needs for successful participation in SEM.
 - Energy Champion – Individual responsible for the success of SEM at the facility. This individual is responsible for coordinating with Focus on Energy and internally with facility staff, such as the Energy Team and Executive Sponsor.
 - Focus on Energy – Program representative working directly with the customer to support meeting SEM objectives, including but not limited to, documenting SEM progress and supporting the tracking and documentation of energy savings.
- 0 Energy-use data for the past 36 months.

step 3**UNDERSTANDING YOUR INCENTIVE RATE AND OFFERING STRUCTURE:**

- 0 Enrolled customers qualify for an incentive of \$0.02/kWh and \$0.20/therm saved on validated energy improvements.
- 0 Customers are limited to \$50,000 in SEM incentives over a 12-month period.
- 0 Eligible projects are limited to those not otherwise eligible for standard rebates or custom incentives (excluding low payback) through Focus on Energy.
- 0 Customers must be willing to share daily energy data on a monthly basis.
- 0 Customers must be able to commit necessary resources to achieve the participation expectations listed in step 5.

step 4**SUBMIT ENROLLMENT APPLICATION:**

- 0 Enrollment approval is contingent upon the receipt of necessary documentation, including the enrollment application. Energy data is required within 30 days of enrollment.
- 0 Submit your completed enrollment application to business@focusonenergy.com or to your Energy Advisor.
- 0 Customers will be notified in writing of their approved enrollment and will work with Focus on Energy to move forward in the participation process.

step 5**PARTICIPATION REQUIREMENTS:**

- 0 Limit participation to water treatment facilities.
- 0 Support the preparation of an energy model and corresponding performance tracker.
 - Provide Focus on Energy with energy-consumption data and requested business variables.
 - Tools used for energy tracking and reporting will be reviewed with the customer prior to the kickoff meeting.
- 0 Attend five virtual educational workshops.
- 0 Conduct an on-site treasure hunt with Focus on Energy Technical Experts to identify savings opportunities.
- 0 Participate in monthly meetings with Focus on Energy to review performance.
- 0 Engage with Focus on Energy to implement energy efficiency opportunities.
- 0 Earn savings and incentives.
 - Receive an incentive of \$0.02/kWh and \$0.20/therm saved, up to \$50,000 in a 12-month period.

WATER TREATMENT SEM COOPERATIVE ENROLLMENT APPLICATION

FOR PROJECTS ENROLLED BY 5/30/2026



Section 4, Item B.

Complete all sections. Incomplete applications will delay approval. Entry is limited to the first 10 customers. For an electronic copy of this form visit focusonenergy.com/business/wastewater.

section 1

ACCOUNT AND CUSTOMER INFORMATION

Tax Identification Number (Check one) FEIN or SSN*

*If you use a Social Security Number (SSN) as your Tax Identification Number, **do not provide it below**. You will be contacted by the Program via email to provide a copy of your W-9 using a secure online portal, if it is not already on file. **You must list an email address in Section 4.**

FEIN

TAX CLASSIFICATION OF CUSTOMER

(Check one. Required for all businesses, including non-profits.)

- Sole Proprietorship S Corporation Partnership
 C Corporation LLC - S Corp LLC - Partnership
 LLC - C Corp Single-Member LLC
 Other _____

OWNER NAME (REQUIRED IF SSN IS USED AS TAX IDENTIFICATION NUMBER)

COMPANY NAME

LEGAL ADDRESS (AS SHOWN ON COMPANY W-9)

CITY STATE ZIP

WHO DID YOU WORK WITH FROM FOCUS ON ENERGY? (CONTACT NAME)

section 2

PARTICIPATING SITE INFORMATION

(Refer to your utility bills for account numbers below.)

PARTICIPATING SITE NAME

PARTICIPATING ADDRESS

CITY STATE ZIP

ELECTRIC UTILITY AT JOB SITE ELECTRIC ACCOUNT #

GAS UTILITY AT JOB SITE GAS ACCOUNT #

- JOB SITE ADDRESS IS SAME AS LEGAL ADDRESS
 JOB SITE ADDRESS IS DIFFERENT (COMPLETE BELOW)

OTHER ENERGY USED

APPROXIMATE ANNUAL KWH

APPROXIMATE ANNUAL THERMS

section 3

BUSINESS PAYMENT INFORMATION

Payee is responsible for any associated tax consequences.

For All Payees

Mail check to: Customer Legal Address Job Site Address
 Alternate Address

COMPANY NAME

LEGAL ADDRESS (AS SHOWN ON COMPANY W-9)

CITY STATE ZIP

ATTENTION TO (OPTIONAL)

section 4

CUSTOMER CONTACT INFORMATION

Executive Sponsor (Decision Maker)

NAME

TITLE

EMAIL

PHONE

SIGNATURE

DATE

Energy Champion (Day-to-Day Contact)

NAME

TITLE

EMAIL

PHONE

SIGNATURE

DATE

Submit applications and supporting documentation to:

MAIL: Focus on Energy
725 W. Park Avenue
Chippewa Falls, WI 54729

EMAIL: business@focusonenergy.com

SIGN
HERE

SIGN
HERE

PARTICIPATION REQUIREMENTS

NEED HELP? Call 800.762.7077

Use the eligibility requirements below to see if your business qualifies for program rebates or incentives. You can also visit focusonenergy.com to find savings opportunities specific to your business.

INFORMATION AND REQUIREMENTS

Before you start your project, make sure you are familiar with participation requirements, program information, and Terms and Conditions.

General Terms and Conditions

Review the Focus on Energy Terms and Conditions at focusonenergy.com/terms or call 800.762.7077 to request a copy.

Rebate and Incentive Limits

Rebates and incentives are limited to \$50,000 per SEM project and \$400,000 per customer per calendar year for all Focus on Energy rebates (standard and custom). Depending on the business tax classification of the payee, the entity receiving the rebate or incentive payment may receive IRS form 1099 for incentives totaling over \$600 in a calendar year.

Reminder: Rebates and incentives are capped at 100% of equipment cost unless otherwise noted. Equipment cost is the amount paid by the customer for qualifying equipment, excluding any Focus on Energy rebate or incentive credit, shipping, and sales tax. Like-for-like equipment replacement due to recall, warranty replacement, etc. is not eligible for a rebate or incentive.

**For more information,
call 800.762.7077
or visit focusonenergy.com**

REDUCING ENERGY WASTE ACROSS WISCONSIN

Focus on Energy, Wisconsin utilities' statewide program for energy efficiency and renewable energy, helps eligible residents and businesses save energy and money while protecting the environment. Focus on Energy information, resources, and financial incentives help to implement energy efficiency and renewable energy projects that otherwise would not be completed.

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Water Systems

800 Hoffmann Drive • P.O. Box 477 • Watertown WI 53094-0477
WASTEWATER (920) 262-4085 • WATER (920) 262-4075

To: Chairman Arnett and members of the Public Works Commission June 17, 2026
From: Peter Hartz – Water Systems Manager

Re: Water Systems agenda items for June 23, 2026, Public Works Commission meeting

Water Systems:

1. Review and take action – Wastewater Department, approve re-issuance of the industrial Wastewater Discharge Permit for Johnsonville LLC.
 - Included for review and discussion is the new permit ready for Perry Way Foods LLC. (Johnsonville) - current permit expires 06-30-2026. There are no significant changes to the previous permit, the permit term is for 5 years from issuance date.
2. Review and take action – Wastewater Department, approve re-issuance of the industrial Wastewater Discharge Permit for Wis-Pak Inc.
 - Included for review and discussion is the new permit ready for Wis-Pak Inc. - current permit expires 06-30-2026. There are no significant changes to the previous permit, the permit term is for 5 years from issuance date.
3. Review and take action – Wastewater Department, approve re-issuance of the industrial Wastewater Discharge Permit for Ad-Tech Industries Inc.
 - Included for review and discussion is the new permit ready for Ad-Tech Industries Inc. - current permit expires 06-30-2026. There are no significant changes to the previous permit, the permit term is for 5 years from issuance date.
4. Review and take action – Wastewater Department, approve re-issuance of the industrial Wastewater Discharge Permit for Clausen Quality Coatings.
 - Included for review and discussion is the new permit ready for Clausen Quality Coatings. - current permit expires 06-30-2026. There are no significant changes to the previous permit, the permit term is for 5 years from issuance date.

Background – Federal, State and Watertown City Codes (Chapter 508) require high strength waste generators to obtain industrial pre-treatment permits in order to discharge to a municipal sanitary sewer system to safeguard the wastewater treatment plant from upsets and potential permit violations with the treated effluent prior to discharge to waters of the State. All these businesses have been under these industrial pre-treatment permits for many permit terms all lasting 5-years.

Budget Goal: Encourages community growth related to environmental needs following codes and priorities.

Fiscal impact: These businesses pay surcharges for waste loadings over allowable residential limits and generate revenue for the wastewater utility. The revenue varies monthly per industry.

Recommendation: It is my recommendation to renew all the industrial pre-treatment permits.

Sincerely,
Peter Hartz
Water Systems Manger

Wastewater Discharge Permit Application

The undersigned hereby requests a wastewater discharge permit from the City of Watertown, Wisconsin.

Names of User: Ad-Tech Industries, Inc.

Address of User: 110 S Votech Drive
Watertown, WI 53094

Authorized Representative of User: Stephen Beyer

Title of Authorized Representative: President

Telephone Number: 920-390-7040

Business Activity: Industrial Coating and EN Plating

Primary SIC No.: 3479

The above-named user hereby requests to discharge wastewater into the City of Watertown wastewater facilities at the following location:

110 S. Votech Drive

Watertown WI 53094

As specified in Chapter 508, Section 508-9 (j)2. of Watertown's Municipal Code, the applicant must include the following information in the permit application:

1. Name, address, and location (if different from the address).
2. SIC number according to the Standard Industrial Classification Manual, Bureau of the Budget, 1971, as amended.
3. Wastewater constituents and characteristics, including but not limited to, those mentioned in Chapter 508-8 of Watertown's Municipal Code, as determined by a reliable analytical laboratory; sampling and analysis shall be performed in accordance with procedures established by the EPA and contained in 40 CFR, Part 136, as amended.
4. Time and duration of wastewater contribution.
5. Average daily and 30-minute peak wastewater flow rates, including daily, monthly, and seasonal variations, if any.

6. Site plans, floor plans, mechanical and plumbing plans and details to show all sewers, sewer connections, and appurtenances by size, location and elevation.
7. General description of activities, facilities, and plant processes on the premises, including all materials which are or could be discharged.
8. The nature and concentration of any pollutants in the discharge which are limited by Chapter 508 of Watertown's Municipal Code (Chapter 508) and a statement regarding whether or not compliance is being achieved with Chapter 508 on a consistent basis and, if not, whether additional operation and maintenance and/or additional pretreatment is required for the user to comply with Chapter 508.
9. If additional pretreatment and/or operation and maintenance will be required to comply with Chapter 508, the industrial user shall submit the shortest schedule by which the user will provide such additional pretreatment and/or implementation of additional operation and maintenance activities.
 - a. The schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for the industrial user to comply with the requirements of Chapter 508, including, but not limited to dates relating to hiring an engineer, completing preliminary plans, completing final plans, executing contract for major components, commencing construction, completing construction, and all other activities necessary to achieve compliance with Chapter 508.
 - b. No time increment for any single activity directed toward compliance shall exceed nine (9) months.
 - c. No later than 14 days following each date in the schedule and the final date for compliance, the industrial user shall submit a progress report to the Superintendent including, as a minimum, whether or not the industrial user complied with the increment of progress to be met on such date and, if not, the date on which the industrial user expects to comply with this increment of progress, the reason for delay, and the steps being taken by the industrial user to return the construction to the schedule established. In no event shall more than nine (9) months elapse between such progress reports to the Superintendent.
10. Each product produced by type, amount, process or processes and rate of production.
11. Type and amount of raw materials processed (average and maximum per day).

12. Number of employees and hours of operation of plant and proposed or actual hours of operation of pretreatment system.

In consideration of the granting of this permit, the undersigned agrees:

- 1. To furnish any additional information relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the City.
- 2. To accept and abide by all provisions of Chapter 508 of the Watertown Municipal Code, and of all other pertinent municipal ordinances or regulations that may be adopted in the future.
- 3. To operate and maintain, in an efficient manner at all times and at no expense to the City, any waster pretreatment facilities, as may be required as a condition of acceptance into the wastewater facilities of the industrial wastes involved.
- 4. To cooperate at all times with the City and its representatives in the inspecting, sampling, and study of the industrial wastes, and any facilities provided for pretreatment.
- 5. To notify the City immediately in the event of any accident, or other occurrence that occasions discharge to the wastewater facilities of any wastewater or substances prohibited or not cover by this permit.
- 6. To furnish with this application a permit fee of \$175.00, as specified in Section 508-9 (8)(a) of Chapter 508 of Watertown's Municipal Code.

Date: 4.2.2024

Signed: 
Authorized Representative

Title: President

Application approved and permit granted:

Date: _____

Signed: _____

Peter Hartz
Water Systems Manager

\$ _____ permit fee paid.

Industrial Wastewater Discharge Permit
No. 0626-31

In compliance with provisions of Chapter 508 of the Municipal Code of Watertown

Ad-Tech Industries Inc.
110 S. Votech Drive
Watertown, Wisconsin 53094

is hereby authorized to discharge industrial wastewater from the above identified facility into the City of Watertown Sanitary Sewer System in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

All discharge authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any substance identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on the date of signature and expires at midnight, June 30, 2031

The terms and conditions of this permit may be subject to modification by the City of Watertown at any time, as limitations or requirements as identified in Chapter 508-9 J(5) of the Municipal Code of Watertown are modified or other just cause exists.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after the expired date, an application shall be filed for re-issuance of this permit in accordance with the requirements of Chapter 508 of the Municipal Code of Watertown, at least 180 days prior to the expiration date.

By:

Peter Hartz
Water Systems Manager

Dated this 1st day of July 2026.

Part 1 - APPLICABLE EFFLUENT LIMITATIONS

SECTION 1 - City of Watertown Pretreatment Standards

A. All wastewaters discharged to the City of Watertown Wastewater Treatment Plant (WWTP) shall not exceed the following limitations:

<u>Parameter</u>	<u>Maximum Allowable Concentration (mg/l)</u>
Arsenic	0.15
Cadmium	0.50
Chromium (Total)	2.60
Copper	1.50
Cyanide	2.30
Free Acids and Alkalis – pH range 5.0 to 9.5 su	10.00
Lead	0.50
Iron Fe ₃	50.00
Mercury	<0.0002
Molybdenum	0.10
Nickel	3.50
Oil, Grease, Etc. (Hexane Solubles)	100.00
Selenium	0.24
Silver	5.00
Zinc	5.00

B. The permittee may not discharge any substance which will cause the Wastewater Treatment Plant to violate its WPDES and/or state disposal system permit or the receiving water quality standards.

C. The permittee may not discharge any pollutants, including oxygen demanding pollutants (B.O.D.5, etc.), at a flow rate and/or pollutant concentration so as to constitute a slug and/or that which may cause interferences with the Wastewater Treatment Plant.

1. General Prohibitions

- General prohibition against interference: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works (POTW) which, alone or in conjunction with discharges from other sources, inhibit or disrupt treatment processes or operations; or inhibit or disrupt sludge processes, use, or disposal. Such interference is demonstrated when as a result of the industry(s) discharge the publicly owned treatment works violates any requirements of its discharge permit (including an increase in the magnitude or duration of a violation), or when the publicly owned treatment work's selected method of sludge usage or disposal is limited.
- General prohibition against pass through: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works which, alone or in conjunction with discharges from other sources, pass through the treatment works into receiving waters in concentrations or quantities which cause a violation of any requirement of the treatment works discharge permit (including an increase in the magnitude or duration of a violation).

- General prohibition against dilution: (Wis. Adm. Code NR 211.13)
No industry may increase the use of water or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with any pretreatment standard or requirement.
 - General prohibition against pretreatment system bypass: (Wis. Adm. Code NR 211.19)
No industry may intentionally divert waste streams from any portion of the pretreatment system facility except where bypass is unavoidable to prevent loss of life, personal injury, or severe property damage and there was no feasible alternatives to bypass. Bypasses which are for essential maintenance, and which do not cause violations of pretreatment standards may be allowed.
2. Specific Prohibitions – No industry may discharge the following pollutants into a POTW: (Wis. Adm. Code NR 211.10)
- Pollutants which create or contribute to a fire or explosion hazard in the POTW, including but not limited to: waste streams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.61.
 - Pollutants listed in Wisconsin Administrative Code Chapter NR 661.
 - Pollutants which will cause or contribute to corrosive structural damage to the POTW but in no case discharges with a pH lower than 5.0 unless the POTW is specifically designed to accommodate such discharges;
 - Solid or viscous pollutants in amounts which will cause or contribute to obstruction to the flow in sewers or other interference with the operation of the POTW.
 - Any pollutant, including oxygen demanding pollutants, released in a discharge of such volume or strength as to cause or contribute to interference in the POTW; or
 - Heat in amounts which will inhibit or contribute to the inhibition of biological activity in the POTW treatment plant resulting in interference or causing damage to the POTW, but in no case heat in such quantities that the temperature exceeds 40°C (104°F) at the influent to the POTW treatment plant unless the Department, at the request of the POTW, has approved alternate temperature limits.
 - Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin an amount that will cause interference or pass through;
 - Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

- Any trucked or hauled pollutants, except at discharge points designated by the POTW.
- The permittee may not discharge any wastewaters containing fats, wax, grease, petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, whether emulsified or not, in excess of one hundred (100) mg/L or containing substances which may solidify or become viscous at temperatures between thirty-two degrees (32°) Fahrenheit and one hundred forty degrees (140°) Fahrenheit (0° and 60° Centigrade).

D. In addition, the permittee shall comply with all other applicable regulations and standards contained in Chapter 508 of the Municipal Code of Watertown.

1. Notification of Accidental Discharge

- In the case of an accidental discharge, it is the responsibility of the permittee to immediately telephone and notify the city of the incident. During working hours from 7:00 a.m. to 3:00 p.m., call the WWTP at 920-262-4085. After hours, call 920-285-4088 and talk with Peter Hartz. If you cannot talk to Mr. Hartz, directly email Mr. Hartz at phartz@watertownwi.gov. The notification shall include location of discharge, type of waste, concentration, and volume. Furthermore, such industrial user shall take immediate action to contain and minimize the accidental discharge to the wastewater facilities and notify the City of the corrective actions.
- Within five (5) days following an accidental discharge, the industrial user shall submit to the WWTP Water Systems Manager a detailed written report describing the cause of the discharge and the measures to be taken by the user to prevent similar further occurrences. Such notification shall not relieve the user of any expense, loss, damage, or such liability which may be incurred as a result of damage to the wastewater facilities, fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liability which may be imposed by this article or other applicable law.

2. Notice to Employees

- A notice shall be permanently posted on the industrial user's bulletin board or other prominent place advising employees who to call in the event of a dangerous discharge. Employers shall ensure that all employees who may cause such a dangerous discharge to occur, or who may suffer from such a discharge, are advised of the emergency notification procedure.

E. Under Section 508-16 (A) of the Municipal Code of Watertown, a surcharge shall be assessed any user discharging wastewater to the Watertown Wastewater Treatment Plant that contains Total B.O.D. in concentrations exceeding 175 mg/L Total Suspended Solids in concentrations exceeding 170 mg/l, Total phosphorus in concentrations exceeding 6 mg/L and Ammonia Nitrogen in concentrations exceeding 25 mg/L. The costs shall be assessed as specified in Section 508-16 (A).

SECTION 2 - EPA Categorical Pretreatment Standards

The permittee discharges certain wastewaters which also are subject to regulation by the following EPA categorical pretreatment standards:

- A. 40 CFR 403 General Pretreatment Regulations for existing and new sources of pollution. Except as provided in 40 CFR 403.7 and 403.13, any existing source subject to this subpart that introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve the listed pretreatment standards for existing sources (PSES):
- B. 40 CFR, Part 413 Electroplating Point Source Category Subpart A, Common Metals Subcategory; Subpart E, Coatings Subcategory; Subpart F, Chemical Etching & Milling Subcategory. Nonintegrated, existing sources, captive facility that discharges > 10,000 gpd from processes regulated by Electroplating Categorical Standards.
- C. 40 CFR, Part 433, Metal Finishing Point Source Category. The Metal Finishing categorical standards apply to the wastewater streams from the regulated process indicated in Section 2A above, in addition to wastewater discharged from any metal finishing operations.
- D. Regulated dischargers shall be in compliance with the categorical pretreatment standards in accordance with 40 CFR 403.6(b).

SECTION 3 - Specific Applicable Effluent Limitations

Based upon the standards identified in Sections 1 and 2, the applicable effluent limitations for Ad-Tech Outfalls are as follows:

- A. Outfall NB 01 (Includes E-Coat NR 101/8, Nickel Plating NR 101/7, 4-line pretreatment NR 101/6, and 8 stage pretreatment addition)
 - 1. Beginning upon the effective date of this permit and extending to midnight June 30, 2031, all wastewater discharged to the City of Watertown sanitary sewer system through the new NB 01 Outfall listed above shall not exceed the following limitations as set forth in the United States Federal Regulations for Electroplating and Metal Finishing Point Source Categories referenced in Section 2 above.

AD-TECH EFFLUENT LIMITATIONS

Pollutant or pollutant property	Daily Maximum for any 1 day (mg/L) **	Monthly Average shall not exceed (mg/L)
Cadmium (T)	0.50	0.26
Chromium (T)	2.60	1.71
Copper (T)	2.07	1.50
Iron (Fe ₃)	50.0	50.0
Lead (T)	0.50	0.43
Nickel (T)	3.50	2.38
Mercury (T)	<0.0002	0.0002
Molybdenum	0.10	0.10
Selenium	0.24	0.24
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO (*)	2.13	2.13
Oil & Grease (Hexane Solubles)	52	26
TSS	60	31
pH	(¹)	(¹)

¹Minimum 5.0 to Maximum 9.0. -- T = Total

* TTO = total toxic organics is equal to the sum of all concentrations over 0.01 mg/l for the compounds listed in 40 CFR Part 433.11€

** indicates that Section 508-8 (D) (1) of the Municipal Ordinance contains a limit for the pollutant. If both the Ordinance and the federal categorical standard contain a limit for the same pollutant, the limitation specified in the permit is the most stringent value between the two and must be complied with by the permittee. Limits for pollutants not covered by Electroplating or Metal Finishing Standards will be tested to demonstrate compliance in the first year of re-issuance of this permit. When compliance is demonstrated, no additional test would be required at this time. Written notification will be sent if additional testing becomes necessary.

Notes:

- Outfall NB 01 as designated on the attached schematics is the sampling location outside prior to discharge in the sewer lateral that exits the building.
- Compliance with the limitations shall be based on sampling performed during full facility production when substances subject to regulation, including those in batch or periodic discharges, are likely to be present in maximum concentrations or quantities for the reporting period.
- Samplers will be started on a production day morning that provides the best representative combined facility production process operation and discharge and be continued for 24 hours. The sample will be collected the next morning and delivered to the Laboratory doing testing in a cooler and on ice by 8:00 am of collection day or to outside lab for set-up the day sample was taken. If sample can't be delivered by 8:00 am, a call to Watertown Wastewater plant will be made to make other arrangements
- Monitoring for cyanide must be conducted after cyanide treatment, if such treatment is present, and before dilution with any other waste streams. Sampling for cyanide shall consist of a series of four (4) grab samples.
- Industrial user charges will be based on Monthly discharges.
- If there is a malfunction of sampler the sample dates will be the following day. All sampling date changes will require Ad-Tech to call the City Wastewater Plant and inform them of the change.
- The annual report shall include a report of all wastes subject to categorical pretreatment standards that have been shipped off-site for disposal. These reports shall include the category, manufacturing process, volume and destination of such waste.
- When a new Parameter is added to the permit in accordance with Chapter 508-9 J(4) of the Municipal Code of Watertown, and all costs will be charged as of the date signed on Addendum and all costs will be charged on as of date signed on Addendum.
- Ad-Tech needs to report to the Watertown Wastewater Treatment Plant the above information with semi-annual compliance reports (no later than January 15 and July 15 of each year).

Part 2 - MONITORING AND REPORTING REQUIREMENTS

SECTION 1 - Monitoring Requirements

- A. With the issuance of this permit, the permittee shall monitor its wastewater discharges subject to the regulations under Part 1 of this permit to ascertain compliance with the applicable limitation. Said monitoring shall be conducted twice per year (Semi-Annually). Sample 1 (January 1 to June 30) Sample 2 (July 1 to December 31).
- B. The monitoring shall consist of sampling the regulated wastewaters for those pollutants regulated under Part 1, Section 3, of this permit and reporting of the results to the WWTP. Samples shall be obtained utilizing flow-proportional sampling techniques. The samples shall be collected over a 24 -hour period. The samples shall be collected over the period of discharge, if less than 24 hours. In the case of samples collected for discharge, if less than 24 hours. In the case of samples collected for oil and grease analysis, or for certain toxic organic compounds, cyanide (at process), and pH, grab samples should be collected and analyzed in lieu of a flow-proportional composite sample. The sample shall be representative of daily operations to include all batch and periodic discharges.
- C. The Wastewater Facilities may waive flow-proportional composite sampling for any industrial discharge that demonstrates that flow-proportional sampling is infeasible. In such cases, samples may be obtained through time-proportional composite sample techniques or through a minimum of four (4) grab samples where the discharger demonstrates this will be a representative sample of the effluent being discharged.
- D. Noncompliance of limits set in Part 1, Section 3 will require additional sampling until compliance is achieved consistently.
- E. Laboratory analysis of samples collected shall be performed in accordance with "Standard Methods for the Examination of Water and Wastewater" as approved in NR 219, with 40 CFR Part 136 of the Federal Code of Regulations dated July 1, 2015, and amendments, thereto. Holding and preservation of collected samples shall be as specified in 40 CFR, part 136 and amendments, thereto.
- F. The City will conduct its own sampling program of the permittee's wastewater discharge. This sampling may or may not take place without formal notification. All samplings will be conducted after Ad-Tech is informed of our presence between 7:00 am and 3:00 pm.
- G. Beginning with the signing date of this permit and thereafter, the permittee shall monitor its wastewater discharges from Outfall NB 01 for the parameters, sampling frequency, and sample types for compliance with the effluent limitations as specified in the table below:

AD-TECH EFFLUENT SAMPLING REQUIREMENTS

Parameter	Units	Sample Frequency	Sample Type
Cadmium (T)	mg/L	2 / year	Composite
Chromium (T)	mg/L	2 / year	Grab (composite of 4 1-hr. apart)
Chromium (Hexavalent)	mg/L	2 / year	Grab (composite of 4 1-hr. apart)
Copper (T)	mg/L	2 / year	Composite
Iron (Fe3)	mg/L	2 / year	Composite
Lead (T)	mg/L	2 / year	Composite
Nickel (T)	mg/L	2 / year	Composite
Mercury (T)	mg/L	2 / year	Composite
Molybdenum	mg/L	2 / year	Composite
Selenium	mg/L	2 / year	Composite
Silver (T)	mg/L	2 / year	Composite
Zinc (T)	mg/L	2 / year	Composite
Cyanide (T)	mg/L	2 / year	Grab (composite of 4 1 hr. apart)
TTO (*)	mg/L	2 / year	Composite
Oil & Grease (Hexane Solubles)	mg/L	2 / year	Grab (composite of 4 1 hr. apart)
TSS	mg/L	2 / year	Composite
pH	S.U.	2 / year	Grab (composite of 4 1 hr. apart)
Flow	Gal / Day	2 / year	Flow meter measured

SECTION 2 - Reporting Requirements

- A. Monitoring results obtained during the period January 1 to June 30 shall be summarized and reported to the WWTP no later than July 15. Monitoring results obtained during the period of July 1 to December 31 shall be summarized and reported to the Assistant Water Systems Manager - Wastewater no later than January 15. The maximum and average daily discharge flows for the designated sampling points that occurred during each reporting period shall be included in each periodic report.
- B. If the permittee monitors any pollutant more frequently than required by this permit, the results of such monitoring shall be submitted to the City's WWTP.
- C. In lieu of monitoring for Total Toxic Organics (TTO), the permittee may submit Certification statements and solvent management plans for the periodic compliance reports. See 413.03 Monitoring Requirements in the Federal Register.
- D. Monitoring reports shall be signed and sworn to by an Authorized Representative, or their designee.
- E. The semi-annual report shall include a report of all wastes subject to categorical pretreatment standards that have been shipped off-site for disposal. These reports shall include the category, manufacturing process, volume and destination of such waste.

- E. Monitoring reports shall also contain type of sampling (grab or composite), time intervals of grab sample, the name of individual(s) who did actual sampling, the names of laboratories if more than one, and the names of individuals who completed the report if different than the Authorized Representative or their designee.
- F. Semi-Annual reports are required for industrial users subject to equivalent mass or concentration limits established by the Wastewater Facilities in accordance with the procedures in 40 CFR 403.6(c). The report shall contain a reasonable measure of the user's long term production rate. For industrial users subject to categorical pretreatment standards, the report shall include the user's actual average production rate for the reporting period.
- G. The industrial user shall notify the Wastewater Facilities, the EPA Region V Waste Management Division Director, and the DNR Bureau of Solid Waste Management in writing of any discharge into the Wastewater Facilities treatment system of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261. The notification of hazardous waste discharge shall be in accordance with Chapter 508-9 (l) (5) of the Wastewater Facilities Ordinance. The industrial user shall certify that it has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree it has determined to be economically practical.
- H. The industrial user shall certify that it has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree limits have been determined to be economically practical.
- I. The semi-annual report shall include a report of all waste (waste means only wastewater that Ad-Tech cannot treat and therefore must be shipped offsite for treatment) are subject to categorical pretreatment standards. These reports shall include the category, manufacturing process, volume and destination of such waste.
- J. Noncompliance reports are required for any discharger which experiences a slug or accidental discharge or experiences an upset in operations which places the discharger in a temporary state of noncompliance with the Wastewater Facilities Ordinance or a wastewater discharge permit issued pursuant hereto. The discharger shall inform the Water Systems Manager thereof immediately of first awareness of the commencement of the slug, accidental discharge or upset. Early notification may enable countermeasures to be taken by the Water Systems Manager to minimize damage to the Wastewater Facilities and the receiving waters. The notification shall include location of discharge, type of waste, concentration and volume, and corrective actions. The city may choose to immediately take action pursuant to the Wastewater Facilities Ordinance. Within five (5) days following an accidental discharge, the discharger shall submit to the Water Systems Manager a detailed written report. The report shall specify:
1. Description and cause of the upset, slug or accidental discharge, the cause thereof, and the impact on the discharger's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.

2. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur.
 3. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset, slug, accidental discharge, or other conditions of noncompliance.
 4. The permittee shall subsequently submit a report containing analytical data demonstrating return to compliance.
- K. If sampling performed by an industrial user indicates a violation of levels in excess of Part 1, Section 3A of this permit, the user shall notify the Wastewater Facilities within 24 hours of becoming aware of the violation. The permittee shall provide the following information in writing to the Water Systems Manager of the WWTP within five (5) working days of becoming aware of such conditions:
1. A description of the discharge and cause of the noncompliance; and
 2. The exact dates and times of noncompliance; and if not corrected, the anticipated duration of noncompliance, and steps being taken to reduce, eliminate, and prevent recurrence of the non-complying discharge.
 3. The user shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Wastewater Facilities within thirty (30) days after becoming aware of the violation. The industrial user is not required to re-sample if the Wastewater Facilities performs sampling at the industrial user's at least once a month, or if the Wastewater Facilities performs sampling between the industrial user's initial sampling and when the industrial user receives the results of this sampling.
 4. The permittee shall subsequently submit a report containing analytical data demonstrating return to compliance.

Part 3 - GENERAL CONDITIONS

In addition to compliance with Parts 1 and 2, this permit is issued conditioned upon compliance with the following general conditions. Violation of any of the permit conditions below, either alone or in conjunction with a violation of Parts 1 or 2 shall be adequate basis for the revocation of this permit.

A. Pretreatment Fee Schedule

1. Administrative Fee: \$175/sampling of permittee wastewater discharge.
2. Sampling Charge: \$250/sampling day for 24-hour composite sample and/or \$30 for grab sample.
3. Laboratory Analysis Charge: charges incurred by outside or at plant testing laboratory.
4. Any additional fees: Fee for reviewing accidental discharge procedures And pretreatment construction will be \$300.

5. The above fee schedule may be changed only with prior written notification by the City of Watertown.

B. Right of Entry

The permittee shall, after reasonable notification by the City of Watertown WWTP, allow the City of Watertown WWTP or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the permittee at all reasonable hours for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling include any time the permittee is operating any process which results in a process wastewater discharge to the City of Watertown WWTP usually between 7:00 am and 3:00 pm.

C. Record Retention

The permittee shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence, and any and all summaries thereof, relating to monitoring, sampling, and chemical analyses made by or on behalf of a user in connection with its discharge. All records, which pertain to matters which are the subject to any enforcement or litigation activities brought by the City pursuant hereto, shall be retained and preserved by the user until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

D. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid; the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

E. Confidential Information

Except for data determined to be confidential under Chapter 508-9 (M) of the Municipal Code of Watertown, all reports required by this permit shall be available for public inspection at the Watertown WWTP.

F. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

1. The exact place, date, and time of sampling.
2. The dates the analysis were performed.
3. The person(s) who perform the analyses.
4. The analytical techniques or methods used; and
5. The results of all required analyses.

G. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of The State Wisconsin as well as being subjected to civil penalties and relief.

H. Modifications or Revision of Permit

1. The terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified in Chapter 508-9 J(5) of the City Municipal Code is modified or other just cause exists.
2. This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.
3. Any modification which results in new conditions in the permit shall include a reasonable time schedule for compliance, if necessary.
4. The Permittee reserves the right to request review or termination of this permit or its subsections in the event of a change in operating parameters or other unforeseen circumstances which make this permit or subsections no longer adequate or relevant. Such request shall be submitted in writing to The City of Watertown WWTP.

I. Dilution

No permittee shall ever increase the use of process water or, in any way; attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the categorical pretreatment standards, or in any other pollutant-specified limitation developed by the City of Watertown or State of Wisconsin. (Comment: blending may be an acceptable means of complying with some of the prohibitions set forth in subsection 508-8 (C) of the City of Watertown Code e.g. pH prohibition). The Wastewater Facilities may impose mass limitations on industrial users which are suspected of using dilution to meet applicable pretreatment standards or requirements or in other cases where the imposition of mass limitations is appropriate.

J. Notice of Intent

Any permittee planning to alter or change any activity at the permittee's facility that would significantly increase or decrease the volume or alter the content of any existing source of industrial wastewater discharge into the City's sewerage system must file a written notice of intent. This does not include changes in volume or content resulting from shifts in existing production levels at the user's facility. A significant increase or decrease shall be defined as a 50 percent increase or decrease in the volume of industrial wastewater currently being discharged by a permittee whose daily average volume of industrial wastewater discharged into the City's sewerage system is 100,000 gallons per day or less. For permittees whose daily average volume of industrial wastewater discharged into the City's sewerage system is greater than 100,000 gallons per day, a significant increase or decrease shall be defined as a 10 percent increase or decrease in volume of industrial wastewater currently being discharged. An alteration shall be defined as any change in chemicals utilized within

a process which will significantly alter the characteristics of the industrial waste discharge.

K. Notification of Changed Discharge

All industrial users shall promptly notify the Wastewater Facilities in advance of any change in its industrial operations which may have an effect upon the waste and wastewaters generated or any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the industrial user has submitted initial notification pursuant to Chapter 508-9 J of the Municipal Code of Watertown. In such event, the Wastewater Facilities may add to, change, or modify the conditions of the permit in accordance with Chapter 508-9 J of the Municipal Code of Watertown.

L. Proper Disposal of Pretreatment Sludge

The disposal of sludge generated within wastewater pretreatment systems shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

M. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or Chapter 508 of the Municipal Code of Watertown, shall inform the City immediately of the first awareness of the commencement of the upsets in accordance with requirements in Chapter 508-9 I of the Municipal Code of Watertown.

N. Industrial User Bypass Provisions

The Wastewater Facilities may approve an anticipated bypass if it determines that the requirements and conditions presented in Chapter 508-9 (K) (3) of the Municipal Code of Watertown are met by the industry.

O. Slug Discharge Control Plan

The Wastewater Facilities will evaluate at least once every two years whether each significant industrial user needs a plan to control slug discharges. If the Wastewater Facilities determines that a slug control plan is needed, the plan shall be developed in accordance with the requirements contained in Chapter 508-9 I(4) of the Municipal Code of Watertown.

P. Publication of Noncompliance

A list of industrial users which, at any time during the previous twelve months, were in significant noncompliance with applicable pretreatment requirements shall be annually published in the local newspaper. The notification shall also summarize any enforcement actions taken against the user during the same 12-month period. Details on the criteria for a significant violator are covered in Chapter 508-9 K(2) of the Municipal Code of Watertown. For Industries not part of Federal Pretreatment requirements and only issued permit to enforce the Municipal Code of Watertown Chapter 508 as it relates to Industrial cost recovery will not be published in paper for those violations. Unless violation is egregious that notification is required. This will be decided by Watertown WWTP personnel.

Q. Civil and Criminal Penalties

Any user of Wastewater Treatment Plant and collection system who is found to have violated an order of the Public Works Committee or who willfully or negligently failed to comply with any provisions of Chapter 508 of Municipal Code of Watertown, and orders, rules, regulations, and permits issued hereunder, shall be subject to fines as established in Chapter 508-10 (E) of the Municipal Code of Watertown.

R. Permit Transfer

Wastewater discharge permits are issued to a specified industrial user for a specified operation. A wastewater discharge permit shall not be reassigned, transferred, or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall comply also with the terms and conditions of the existing permit.

S. Signatory Requirements

All reports and applications for renewal required by this permit shall be signed by a principal executive officer of the permittee, or his designee.

T. Reporting Address: All reports required by this permit shall be submitted to;

Watertown Water Systems Manager
P.O. Box 477
Watertown, WI 53094

Wastewater Discharge Permit Application

The undersigned hereby requests a wastewater discharge permit from the City of Watertown, Wisconsin.

Names of User: **Perry Way Foods LLC**

Address of User: **1222 Perry Way, Watertown, WI 53094**

Authorized Representative of User: **Matt Lewis**

Title of Authorized Representative: **Plant Director**

Telephone Number: **(920) 290-6700**

Business Activity: **Pig Slaughter Operation and Sausage Production**

Primary SIC No.: **2011**

The above-named user hereby requests to discharge wastewater into the City of Watertown wastewater facilities at the following location:

**1222 Perry Way
Watertown, WI 53094**

As specified in Chapter 508, Section 508-9 (j)2. of Watertown's Municipal Code, the applicant must include the following information in the permit application:

1. Name, address, and location (if different from the address). **SAME**
2. SIC number according to the Standard Industrial Classification Manual, Bureau of the Budget, 1971, as amended. - **2011**
3. Wastewater constituents and characteristics, including but not limited to, those mentioned in Chapter 508-8 of Watertown's Municipal Code, as determined by a reliable analytical laboratory; sampling and analysis shall be performed in accordance with procedures established by the EPA and contained in 40 CFR, Part 136, as amended. **See Attachment A**
4. Time and duration of wastewater contribution. **The facility will run 3 shifts (3rd shift being Sanitation and Maintenance). On average, wastewater will be discharged 20-24 per day, 5 days per week. Duration and days per week will change periodically, depending on demand for product.**
5. Average daily and 30-minute peak wastewater flow rates, including daily,

monthly, and seasonal variations, if any.

We expect average daily flow rates to be around 100,000 gallons per day, with peak flow rates of 300gpm Maximum daily follow of 170,000 gpd. Flow will vary from month to month, but variation is not predictable and will depend on demand for products.

6. Site plans, floor plans, mechanical and plumbing plans and details to show all sewers, sewer connections, and appurtenances by size, location and elevation. See attachments D and E
7. General description of activities, facilities, and plant processes on the premises, including all materials which are or could be discharged.

Plant Activities:

The plant processes sows, harvesting the meat to produce batter mixed with salt and spices; as well as harvesting and processing whole ribs and loins. Some of the batter is further processed on-site into fresh sausage; some is transported to other facilities for final processing and packaging. The facility recovers organs and other non-edible portions of the hog for pharmaceutical and other uses, such as the pet industry. Non-edible parts and blood are captured and rendered off-site. Sows arrive at the site in trailers bedded with straw and are housed temporarily on-site in a covered holding barn/pens. The facility generally processes all animals the day of arrival. Few, if any, hogs are kept overnight. Very rarely are animals kept over a weekend.

Wastewater Sources:

Wastewater is generated throughout the process, mainly from the following areas and activities:

- Hog Pens
- Harvest Facilities
- Boning Process
- Formulation/Blending
- Finished Goods Production Lines
- Cleaning & Washdown Operations

Attachment A shows actual effluent flow (as billed) for each of the last 12 months; with averages of the pH, BOD, TSS, ammonia, and Total Phosphorus concentrations measured in process wastewater effluent each month. Composite effluent samples are collected twice each week, and analytical results are submitted directly to the Watertown POTW. Surcharges for flow, BOD, TSS, ammonia, and total Phosphorus are calculated from the full data set. Attachment A is just the previous 12 month summary of that data.

8. The nature and concentration of any pollutants in the discharge which are limited by Chapter 508 of Watertown's Municipal Code (Chapter 508) and a statement regarding whether or not compliance is being achieved with Chapter 508 on a consistent basis and, if not, whether additional operation

and maintenance and/or additional pretreatment is required for the user to comply with Chapter 508.

Recommended Pollutant Limitations

Pollutant	Concentration (mg/l)
Arsenic	0.15
Cadmium	0.50
Chromium	2.6
Copper	1.5
Cyanide	2.3
Lead	0.5
Mercury	<0.0002
Molybdenum	0.1
Nickel	3.5
Selenium	0.24
Silver	5.0
Zinc	5.0

Except for Oil and Grease, Perry Way Foods processes do not have the potential to introduce the contaminants with effluent limitations, per City Ordinance. To remove oil and grease, a rotary screen and a DAF system (with flocculant and coagulant additives) treat process wastewater from the harvest and production facility. The pretreatment system facilitates compliance with the City of Watertown ordinance prohibiting discharge of wastewater where fat, oil, and grease exceed 100 mg/L.

Raw process wastewater will contain significant quantities of the following parameters which have target values (potentially enforceable as limits):

PARAMETER:	TARGET VALUES or LIMITS:
<i>BOD</i>	
<i>BOD weekly average</i>	<i>850 lbs/day</i>
<i>BOD daily maximum</i>	<i>1,000 lbs/day</i>
<i>BOD weekly average</i>	<i>175 mg/L</i>
<i>TSS weekly average</i>	<i>170 mg/L</i>
<i>Total Phosphorus, weekly average</i>	<i>6 mg/L</i>
<i>Ammonia, weekly average</i>	<i>25 mg/L</i>
<i>pH</i>	<i>5.0 to 9.0 standard units</i>

The screen and DAF generally maintain effluent oil and grease at or below 100 mg/L. As shown in Attachment A the average Oil & Grease concentrations for the previous 12 months ranged from 20.6 mg/L to 75.3 mg/L.

9. If additional pretreatment and/or operation and maintenance are required to comply with Chapter 508, the industrial user shall submit the shortest schedule by which the user will provide such additional pretreatment and/or implementation of additional operation and maintenance activities. **None currently**
 - a. The schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for the industrial user to comply with the requirements of Chapter 508, including, but not limited to dates relating to hiring an engineer, completing preliminary plans, completing final plans, executing contract for major components, commencing construction, completing construction, and all other activities necessary to achieve compliance with Chapter 508. **N/A**
 - b. No time increment for any single activity directed toward compliance shall exceed nine (9) months. **N/A**
 - c. No later than 14 days following each date in the schedule and the final date for compliance, the industrial user shall submit a progress report to the Superintendent including, as a minimum, whether or not the industrial user complied with the increment of progress to be met on such date and, if not, the date on which the industrial user expects to comply with this increment of progress, the reason for delay, and the steps being taken by the

industrial user to return the construction to the schedule established. In no event shall more than nine (9) months elapse between such progress reports to the Superintendent. N/A

- 10. Each product produced by type, amount, process or processes and rate of production.

Harvest/Boning facilities process ~1,800 sows per day, having an average weight of 500 pounds

Fresh sausage production facilities process approximately 44 million pounds of fresh sausage annually, or approximately 170,000 pounds per day

- 11. Type and amount of raw materials processed (average and maximum per day).

Average of 1,200 sows per day at 500 pounds per sow. Maximum 1,800 sows per day.

- 12. Number of employees and hours of operation of plant and proposed or actual hours of operation of pretreatment system.

Approximately 300 employees, over 3 shifts. Begins approximately 5:00am Monday through 7:00am Saturday. However, days and times may be adjusted depending on product demand. Pretreatment system will operate whenever plant is in operation and discharging wastewater.

In consideration of the granting of this permit, the undersigned agrees:

- 1. To furnish any additional information relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the City.
- 2. To accept and abide by all provisions of Chapter 508 of the Watertown Municipal Code, and of all other pertinent municipal ordinances or regulations that may be adopted in the future.
- 3. To operate and maintain, in an efficient manner at all times and at no expense to the City, any waster pretreatment facilities, as may be required as a condition of acceptance into the wastewater facilities of the industrial wastes involved.
- 4. To cooperate at all times with the City and its representatives in the inspecting, sampling, and study of the industrial wastes, and any facilities provided for pretreatment.
- 5. To notify the City immediately in the event of any accident, or other occurrence that occasions discharge to the wastewater facilities of any wastewater or substances prohibited or not cover by this permit.
- 6. To furnish with this application a permit fee of \$175.00, as specified in Section 508-9 (8)(a) of Chapter 508 of Watertown's Municipal Code.

PERRY WAY FOODS PERMIT RENEWAL

Date: 12-17-2025

Signed: Matthew M. Jones

Authorized Representative

Title: Plant Director

Application approved and permit granted:

Date: _____

Signed: _____

Peter Hartz
Water Systems Manager

\$ _____ permit fee paid.

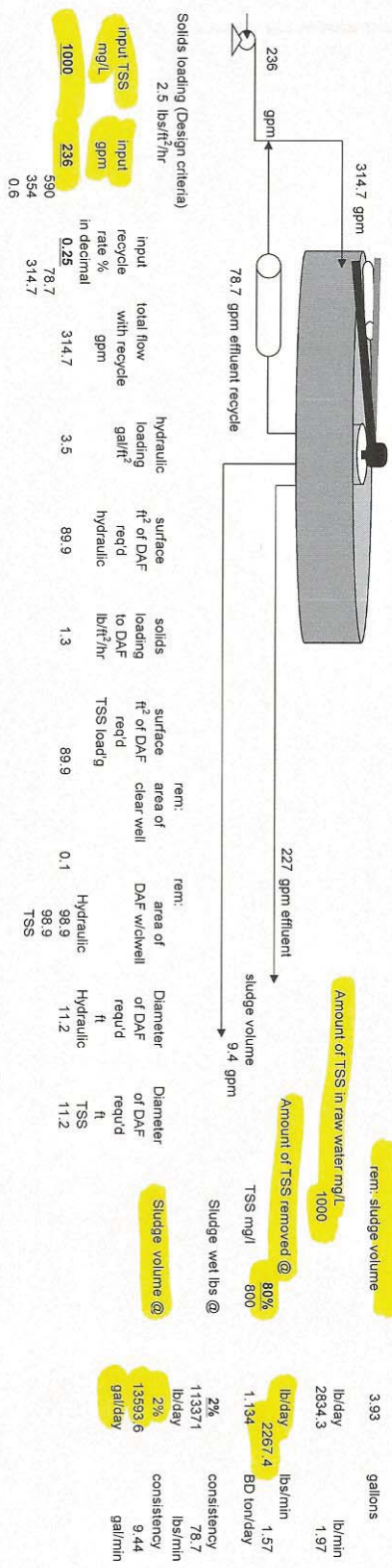
Attachments:

- Attachment A: 2024-2025 (12month) Flow & Loading Data
- Attachment B: DAF Design Calculations
- Attachment C: Flow Schematic
- Attachment D: Wastewater Pretreatment system layout
- Attachment E: Sewer/Drain layout

Attachment A

Monthly Wastewater Flows and Average Concentrations

Month	Monthly Flow Gallons	Monthly Average					
		BOD (mg/L) (mg/L)	pH	TSS (mg/L)	NH3-N (mg/L)	Oil&Grease (mg/L)	Total Phosphorous (mg/L)
Dec-24	1,064,192	858	6.1	213	8.1	26.2	3.2
Jan-25	2,136,480	767	6.4	149	11.1	35.7	2.6
Feb-25	2,001,408	804	6.1	313	7.8	44.4	4.0
Mar-25	2,054,640	741	6.5	230	9.5	38.4	2.9
Apr-25	2,504,432	673	6.4	119	9.0	32.0	1.8
May-25	2,504,016	618	6.5	128	6.8	20.6	1.5
Jun-25	2,598,528	681	6.6	127	11.3	22.3	3.2
Jul-25	2,661,088	537	6.7	140	16.1	22.4	1.9
Aug-25	2,620,016	686	6.7	125	14.1	38.6	2.3
Sep-25	2,332,976	748	6.5	214	19.0	75.3	3.1
Oct-25	2,406,292	672	6.6	188	14.1	73.6	2.5
Nov-25	1,758,688	1,300	6.8	182	12.9	61.2	5.5



Installation Site
 Johnsonville Sausage Phoenix
 1222 Perry Way
 Watertown, WI

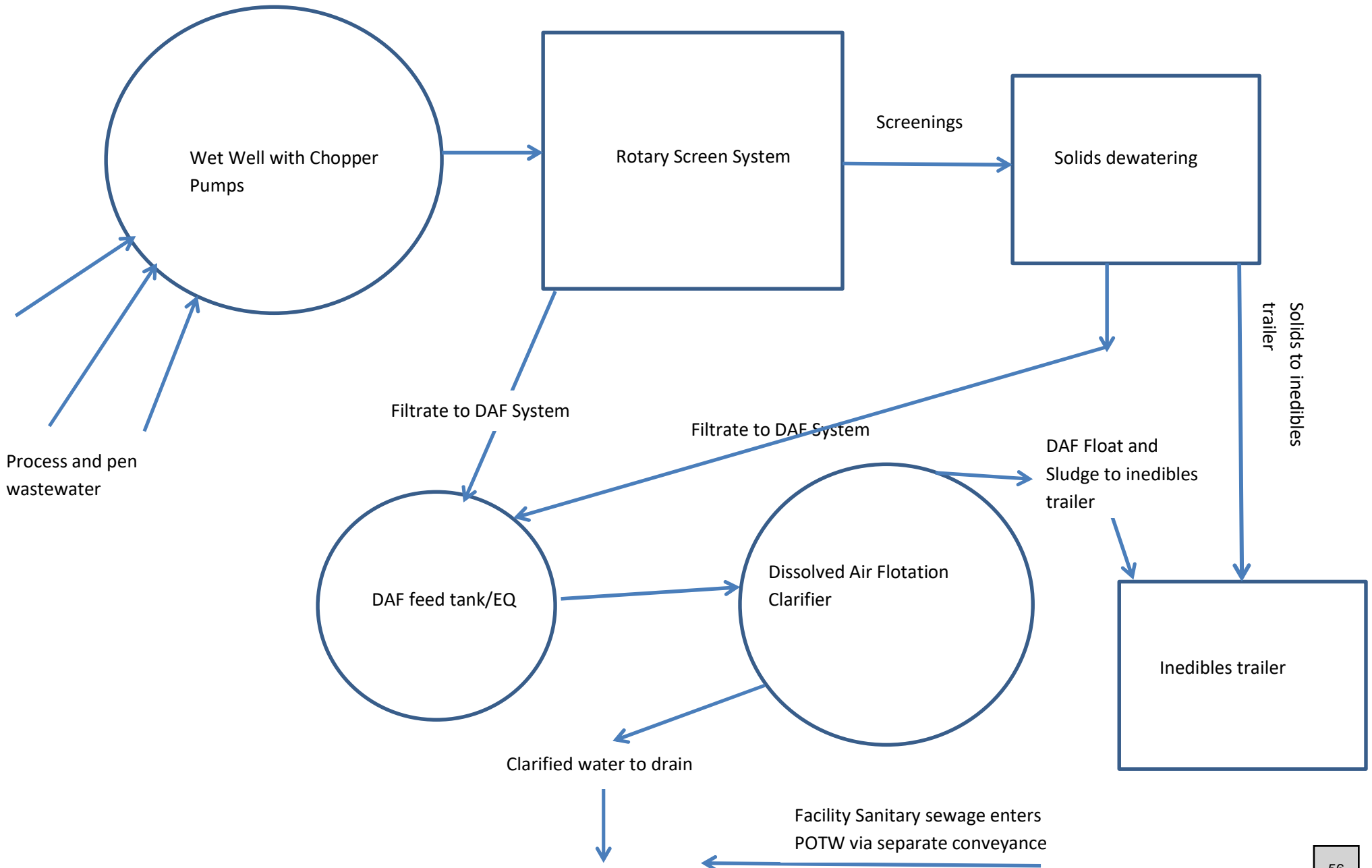
Date 2/1/2016

Design Conditions
 FC-120, 12' DAF Maximizer

Dissolved Air Flotation Corporation
 P.O. Box 497 Kaukauna, WI 54130
 E-Mail: jva@dafcorp.com
 Internet: www.dafcorp.com
 Ph. 920-766-6052
 Fax. 920-766-6054

Facility Design Bases
 Production per 12 hour day 170,000 gal with 1,000 mg/L TSS
 DAF Removal assumptions without chemical treatment
 DAF Flow 12 hour operation 236 gpm

ATTACHMENT C
JOHNSONVILLE, LLC / PERRY WAY FOODS – WASTEWATER TREATMENT SYSTEM, SCHEMATIC FLOW DIAGRAM



Industrial Wastewater Discharge Permit
No. 0910-03

In compliance with provisions of Chapter 508 of the Municipal Code of Watertown

Johnsonville LLC
1222 Perry Way
Watertown, Wisconsin 53094

is hereby authorized to discharge industrial wastewater from the above identified facility into the City of Watertown Sanitary Sewer System in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

All discharge authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any substance identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on the date of signature and expires at midnight, June 30, 2031

The terms and conditions of this permit may be subject to modification by the City of Watertown at any time, as limitations or requirements as identified in Chapter 508-9 J(5) of the Municipal Code of Watertown are modified or other just cause exists.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after the expired date, an application shall be filed for re-issuance of this permit in accordance with the requirements of Chapter 508 of the Municipal Code of Watertown, at least 180 days prior to the expiration date.

By:

Peter Hartz
Water Systems Manager

Dated this 1st day of July 2026.

Part 1 - APPLICABLE EFFLUENT LIMITATIONS

SECTION 1 - City of Watertown Pretreatment Standards

A. All wastewaters discharged to the City of Watertown Wastewater Treatment Plant (WWTP) shall not exceed the following limitations:

<u>Parameter</u>	<u>Maximum Allowable Concentration (mg/l)</u>
Arsenic	0.15
Cadmium	0.50
Chromium (Total)	2.60
Copper	1.50
Cyanide	2.30
Free Acids and Alkalis – pH range 5.0 to 9.5 su	10.00
Lead	0.50
Mercury	<0.0002
Molybdenum	0.10
Nickel	3.50
Oil, Grease, Etc. (Hexane Solubles)	100.00
Selenium	0.24
Silver	5.00
Zinc	5.00

B. The permittee may not discharge any substance which will cause the Wastewater Treatment Plant to violate its WPDES and/or state disposal system permit or the receiving water quality standards.

C. The permittee may not discharge any pollutants, including oxygen demanding pollutants (B.O.D.5, etc.), at a flow rate and/or pollutant concentration so as to constitute a slug and/or that which may cause interferences with the Wastewater Treatment Plant.

1. General Prohibitions

- General prohibition against interference: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works (POTW) which, alone or in conjunction with discharges from other sources, inhibit or disrupt treatment processes or operations; or inhibit or disrupt sludge processes, use, or disposal. Such interference is demonstrated when as a result of the industry(s) discharge the publicly owned treatment works violates any requirements of its discharge permit (including an increase in the magnitude or duration of a violation), or when the publicly owned treatment work's selected method of sludge usage or disposal is limited.
- General prohibition against pass through: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works which, alone or in conjunction with discharges from other sources, pass through the treatment works into receiving waters in concentrations or quantities which cause a violation of any requirement of the treatment works discharge permit (including an increase in the magnitude or duration of a violation).

- General prohibition against dilution: (Wis. Adm. Code NR 211.13)
No industry may increase the use of water or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with any pretreatment standard or requirement.
 - General prohibition against pretreatment system bypass: (Wis. Adm. Code NR 211.19)
No industry may intentionally divert waste streams from any portion of the pretreatment system facility except where bypass is unavoidable to prevent loss of life, personal injury, or severe property damage and there were no feasible alternatives to bypass. Bypasses which are for essential maintenance, and which do not cause violations of pretreatment standards may be allowed.
2. Specific Prohibitions – No industry may discharge the following pollutants into a POTW: (Wis. Adm. Code NR 211.10)
- Pollutants which create or contribute to a fire or explosion hazard in the POTW, including but not limited to: waste streams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.61.
 - Pollutants listed in Wisconsin Administrative Code Chapter NR 661.
 - Pollutants which will cause or contribute to corrosive structural damage to the POTW but in no case discharges with a pH lower than 5.0 unless the POTW is specifically designed to accommodate such discharges;
 - Solid or viscous pollutants in amounts which will cause or contribute to obstruction to the flow in sewers or other interference with the operation of the POTW.
 - Any pollutant, including oxygen demanding pollutants, released in a discharge of such volume or strength as to cause or contribute to interference in the POTW; or
 - Heat in amounts which will inhibit or contribute to the inhibition of biological activity in the POTW treatment plant resulting in interference or causing damage to the POTW, but in no case heat in such quantities that the temperature exceeds 40°C (104°F) at the influent to the POTW treatment plant unless the Department, at the request of the POTW, has approved alternate temperature limits.
 - Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin an amount that will cause interference or pass through;
 - Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

- Any trucked or hauled pollutants, except at discharge points designated by the POTW.
- The permittee may not discharge any wastewaters containing fats, wax, grease, petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, whether emulsified or not, in excess of one hundred (100) mg/L or containing substances which may solidify or become viscous at temperatures between thirty-two degrees (32°) Fahrenheit and one hundred forty degrees (140°) Fahrenheit (0° and 60° Centigrade).

D. In addition, the permittee shall comply with all other applicable regulations and standards contained in Chapter 508 of the Municipal Code of Watertown.

1. Notification of Accidental Discharge

- In the case of an accidental discharge, it is the responsibility of the permittee to immediately telephone and notify the city of the incident. During working hours of 7:00 a.m. to 3:00 p.m., call the WWTP at 920-262-4085. After hours, call 920-285-4088 and talk with Peter Hartz. If you cannot talk to Mr. Hartz, directly email Mr. Hartz at phartz@watertownwi.gov. The notification shall include location of discharge, type of waste, concentration, and volume. Furthermore, such industrial user shall take immediate action to contain and minimize the accidental discharge to the wastewater facilities and notify the City of the corrective actions.
- Within five (5) days following an accidental discharge, the industrial user shall submit to the WWTP Water Systems Manager a detailed written report describing the cause of the discharge and the measures to be taken by the user to prevent similar further occurrences. Such notification shall not relieve the user of any expense, loss, damage, or such liability which may be incurred as a result of damage to the wastewater facilities, fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liability which may be imposed by this article or other applicable law.

2. Notice to Employees

- A notice shall be permanently posted on the industrial user's bulletin board or other prominent places advising employees who to call in the event of a dangerous discharge. Employers shall ensure that all employees who may cause such a dangerous discharge to occur, or who may suffer from such a discharge, are advised of the emergency notification procedure.

E. Under Section 508-16 (A) of the Municipal Code of Watertown, a surcharge shall be assessed any user discharging wastewater to the Watertown Wastewater Treatment Plant that contains Total B.O.D. in concentrations exceeding 175 mg/L Total Suspended Solids in concentrations exceeding 170 mg/l, Total phosphorus in concentrations exceeding 6 mg/L and Ammonia Nitrogen in concentrations exceeding 25 mg/L. The costs shall be assessed as specified in Section 508-16 (A).

SECTION 2 - EPA Categorical Pretreatment Standards

The permittee discharges certain wastewaters which also are subject to regulation by the following EPA categorical pretreatment standards:

- A. 40 CFR 403 General Pretreatment Regulations for existing and new sources of pollution.
- B. 40 CFR Part 432, Meat and Poultry Products Point Source Category. The Meat and Poultry Products categorical standards apply to wastewater streams from the regulated meat and poultry processing operations at this facility. Regulated dischargers shall be in compliance with the categorical pretreatment standards in accordance with 40 CFR 403.6(b).

SECTION 3 - Specific Applicable Effluent Limitations

Based upon the standards identified in Sections 1 and 2, the applicable effluent limitations for Johnsonville LLC Sampling DAF line 100 are as follows:

A. Sampling / DAF Line 100

1. Beginning upon the effective date of this permit and extending to midnight June 30, 2031, all wastewater discharged to the City of Watertown sanitary sewer system through Sampling DAF Line 100 shall be subject to the following Target Values. In the event of wastewater treatment plant disruption, the City, upon prior notice to the permittee, *may enforce the target values as effluent limitations*. However, the target values noted below will be used to establish charges to the permittee under the Industrial Cost Recovery Act based residential limits in Chapter 508 of the Municipal Code of Watertown.
(Note: weekly average = Sunday to Saturday)

- 5-day B.O.D. (Weekly avg.) 850 pounds/day
- 5-day B.O.D. (Daily maximum) - 1,000 pounds/day
- 5-day B.O.D. (Daily avg.) 175 mg/L
- Total Suspended Solids (Weekly avg.) 170 mg/L
- Total Phosphorus (Weekly avg.) 6 mg/L
- Ammonia Nitrogen (Weekly avg.) 25 mg/L
- Oil, Grease, Etc. (Hexane Solubles) – Shall not exceed 100.00 mg/L
- pH (Daily - 5.0 to 9.5)

Notes:

- Industrial user charges will be based on Monthly discharges.
- Sampling DAF Line 100 as designated on the attached schematics is the sampling location on the sewer lateral.

- Samplers will start on Monday and Wednesday morning and continue for 24 hours. The sample will be collected Tuesday and Thursday morning and delivered to the Laboratory doing testing in a cooler and on ice by 8:00 am of collection day or to outside lab for set-up the day sample was taken. if sample can't be delivered by 8:00 am, a call to Watertown Wastewater plant will be made to make other arrangements.
- If there is a malfunction of sampler the sample dates will be the following day. All sampling date changes will require Johnsonville LLC to call the City Wastewater Plant and inform them of the change.
- When a new Parameter is added to the permit in accordance with Chapter 508-9 J(4) of the Municipal Code of Watertown, and all costs will be charged as of the date signed on Addendum and all costs will be charged on as of date signed on Addendum.
- B. O. D stands for Biological Oxygen Demand 5-day Test
- The permittee may request by letter to the Watertown WWTP a lesser frequency of testing after a pattern of consistent results are achieved. Each request will be reviewed by WWTP personnel, and a determination will be made. This is solely the judgment of the WWTP personnel.

Part 2 - MONITORING AND REPORTING REQUIREMENTS

SECTION 1 - Monitoring Requirements

A. Beginning with the signing date of this permit and thereafter, the permittee shall monitor its wastewater discharges from Sampling DAF Line 100 for the parameters, sampling frequency, and sample types as specified:

<u>Parameter</u>	<u>Units</u>	<u>Sample Frequency*</u>	<u>Sample Type</u>
B.O.D.	mg/L	Tuesday, Thursday	24 hr. FPC
S.S.	mg/L	Tuesday, Thursday	24 hr. FPC
Total Phosphorus	mg/L	Tuesday, Thursday	24 hr. FPC
Ammonia Nitrogen	mg/L	Tuesday, Thursday	24 hr. FPC
Oil, Grease, Etc. (H)	mg/L	Tuesday, Thursday	24 hr. FPC
B.O.D.	lbs/day	Tuesday, Thursday	Composite
SS	lbs/day	Tuesday, Thursday	Composite
Total Phosphorus	lbs/day	Tuesday, Thursday	Composite
Ammonia Nitrogen	lbs/day	Tuesday, Thursday	Composite
pH	S.U.	Tuesday, Thursday	1 Grab / Day
Flow	gal/day	Daily	

*May be required to perform Daily Sample Frequency with notification by Water Systems Manager.

Note: BOD is 5-day biological oxygen demand, and TSS is total suspended solids
FPC = flow proportional composite

B. Laboratory analysis of samples collected shall be performed in accordance with "Standard Methods for the Examination of Water and Wastewater" as approved in NR 219, with 40 CFR Part 136 of the Federal Code of Regulations dated July 1, 2015,

and amendments, thereto. Holding and preservation of collected samples shall be as specified in 40 CFR, part 136 and amendments, thereto.

- C. The City will conduct its own sampling program of the permittee's wastewater discharge. This sampling may or may not take place without formal notification. All sampling will be conducted after Johnsonville LLC is informed of our presence between 7:00 am and 3:00 pm.

SECTION 2 - Reporting Requirements

- A. Monitoring results obtained during each week shall be reported to the Water Systems Manager no later than 15 days after each week's sampling.
- B. If the permittee monitors any pollutant more frequently than required by this permit, the results of such monitoring shall be submitted to the City's WWTP.
- C. Monitoring reports shall be signed and sworn to by an Authorized Representative, or their designee.
- D. Monitoring reports shall also contain type of sampling (grab or composite), time intervals of grab sample, the name of individual(s) who did actual sampling, the names of laboratories if more than one, and the names of individuals who completed the report if different than the Authorized Representative or their designee.

If sampling performed by an industrial user indicates a violation of levels in excess of Part 1, Section 3A of this permit, the user shall notify the Wastewater Facilities within 24 hours of becoming aware of the violation. The permittee shall provide the following information in writing to the Water Systems Manager of the WWTP within five (5) working days of becoming aware of such condition:

1. A description of the discharge and cause of the noncompliance; and
 2. The exact dates and times of noncompliance; and if not corrected, the anticipated duration of noncompliance, and steps being taken to reduce, eliminate, and prevent recurrence of the non-complying discharge.
- E. Noncompliance reports are required for any discharger which experiences a slug or accidental discharge or experiences an upset in operations which places the discharger in a temporary state of noncompliance with the Wastewater Facilities Ordinance or a wastewater discharge permit issued pursuant hereto. The discharger shall inform the Water Systems Manager thereof immediately of first awareness of the commencement of the slug, accidental discharge or upset. Early notification may enable countermeasures to be taken by the Water Systems Manager to minimize damage to the Wastewater Facilities and the receiving waters. The notification shall include location of discharge, type of waste, concentration and volume, and corrective actions. The City may choose to immediately take action pursuant to the Wastewater Facilities Ordinance. Within five (5) days following an accidental discharge, the discharger shall submit to the Water Systems Manager a detailed written report. The report shall specify:
1. Description and cause of the upset, slug or accidental discharge, the cause thereof, and the impact on the discharger's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.

2. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur.
 3. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset, slug, accidental discharge, or other conditions of noncompliance.
 4. The permittee shall subsequently submit a report containing analytical data demonstrating return to compliance.
- F. The industrial user shall notify the Wastewater Facilities, the EPA Region V Waste Management Division Director, and the DNR Bureau of Solid Waste Management in writing of any discharge into the Wastewater Facilities treatment system of a substance, which, if otherwise disposed of, would be hazardous waste under 40 CFR Part 261. The notification of hazardous waste discharge shall be in accordance with Chapter 508-9 (l) (5) of the Wastewater Facilities Ordinance. The industrial user shall certify that it has a program to reduce the volume and toxicity of hazardous waste generated to the degree it has determined to be economically practical.
- G. All reports required by this permit shall be submitted to:

Wastewater Treatment Plant
Attention: Water Systems Manager
P.O. Box 477
Watertown, WI 53094

SECTION 3 – Pre-Treatment and Monitoring Facilities Compliance Schedule

- A. The permittee shall provide the necessary wastewater pretreatment to comply with the target values identified in Part 1, Section 3.

Part 3 - GENERAL CONDITIONS

In addition to compliance with Parts 1 and 2, this permit is issued conditioned upon compliance with the following general conditions. Violation of any of the permit conditions below, either alone or in conjunction with a violation of Parts 1 or 2 shall be adequate basis for the revocation of this permit.

A. Pretreatment Fee Schedule

1. Administrative Fee: \$175/sampling of permittee wastewater discharge.
2. Sampling Charge: \$250/sampling day for 24-hour composite sample and/or \$30 for grab sample.
3. Laboratory Analysis Charge: charges incurred by outside or at plant testing laboratory.
4. Any additional fees: Fee for reviewing accidental discharge procedures And pretreatment construction will be \$300.
5. The above fee schedule may be changed only with prior written notification by the City of Watertown.

B. Right of Entry

The permittee shall, after reasonable notification by the City of Watertown WWTP, allow the City of Watertown WWTP or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the permittee at all reasonable hours for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling include any time the permittee is operating any process which results in a process of wastewater discharge to the City of Watertown WWTP usually between 7:00 am and 3:00 pm.

C. Record Retention

The permittee shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence, and any and all summaries thereof, relating to monitoring, sampling, and chemical analyses made by or on behalf of a user in connection with its discharge. All records, which pertain to matters which are the subject to any enforcement or litigation activities brought by the City pursuant hereto, shall be retained and preserved by the user until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

D. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid; the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

E. Confidential Information

Except for data determined to be confidential under Chapter 508-9 (M) of the Municipal Code of Watertown, all reports required by this permit shall be available for public inspection at the Watertown WWTP.

F. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

1. The exact place, date, and time of sampling;
2. The dates of the analysis were performed;
3. The person(s) who perform the analyses;
4. The analytical techniques or methods used; and
5. The results of all required analysis.

G. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may

result in punishment under the criminal laws of The State Wisconsin as well as being subjected to civil penalties and relief.

H. Modifications or Revision of Permit

1. The terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified in Chapter 508-9 J(5) of the City Municipal Code are modified or other just cause exists.
2. This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.
3. Any modification which results in new conditions in the permit shall include a reasonable time schedule for compliance, if necessary.
4. The Permittee reserves the right to request review or termination of this permit or its subsections in the event of a change in operating parameters or other unforeseen circumstances which make this permit or subsections no longer adequate or relevant. Such request shall be submitted in writing to The City of Watertown WWTP.

I. Dilution

No permittee shall ever increase the use of process water or, in any way; attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the categorical pretreatment standards, or in any other pollutant-specified limitation developed by the City of Watertown or State of Wisconsin. (Comment: blending may be an acceptable means of complying with some of the prohibitions set forth in subsection 508-8 (C) of the City of Watertown Code e.g. pH prohibition). The Wastewater Facilities may impose mass limitations on industrial users which are suspected of using dilution to meet applicable pretreatment standards or requirements or in other cases where the imposition of mass limitations is appropriate.

J. Notification of Changed Discharge

All industrial users shall promptly notify the Wastewater Facilities in advance of any change in its industrial operations which may have an effect upon the waste and wastewaters generated or any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the industrial user has submitted initial notification pursuant to Chapter 508-9 (J) of the Municipal Code of Watertown. In such event, the Wastewater Facilities may add to, change, or modify the conditions of the permit in accordance with Chapter 508-9 J of the Municipal Code of Watertown.

K. Proper Disposal of Pretreatment Sludge

The disposal of sludge generated within wastewater pretreatment systems shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

L. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or Chapter 508 of the Municipal Code of Watertown, shall inform the City immediately of the first awareness of the commencement of the upsets in accordance with requirements in Chapter 508-9 I of the Municipal Code of Watertown.

M. Slug Discharge Control Plan

The Wastewater Facilities will evaluate at least once every two years whether each significant industrial user needs a plan to control slug discharges. If the Wastewater Facilities determines that a slug control plan is needed, the plan shall be developed in accordance with the requirements contained in Chapter 508-9 I(4) of the Municipal Code of Watertown.

N. Publication of Noncompliance

A list of industrial users which, at any time during the previous twelve months, were in significant noncompliance with applicable pretreatment requirements shall be annually published in the local newspaper. The notification shall also summarize any enforcement actions taken against the user during the same 12-month period. Details on the criteria for a significant violator are covered in Chapter 508-9 K(2) of the Municipal Code of Watertown. For Industries not part of Federal Pretreatment requirements and only issued permit to enforce the Municipal Code of Watertown Chapter 508 as it relates to Industrial cost recovery will not be published in paper for those violations. Unless violation is egregious that notification is required. This will be decided by Watertown WWTP personnel.

O. Civil and Criminal Penalties

Any user of Wastewater Treatment Plant and collection system who is found to have violated an order of the Public Works Committee or who willfully or negligently failed to comply with any provisions of Chapter 508 of Municipal Code of Watertown, and orders, rules, regulations, and permits issued hereunder, shall be subject to fines as established in Chapter 508-10 (E) of the Municipal Code of Watertown.

P. Permit Transfer

Wastewater discharge permits are issued to a specified industrial user for a specified operation. A wastewater discharge permit shall not be reassigned, transferred, or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall comply also with the terms and conditions of the existing permit.

Q. Signatory Requirements

All reports required by this permit shall be signed by a principal executive officer of the permittee, or his designee.

R. Reporting Address: All reports required by this permit shall be submitted to;

Water Systems Manager
P.O. Box 477
Watertown, WI 53094

Wastewater Discharge Permit Application

The undersigned hereby requests a wastewater discharge permit from the City of Watertown, Wisconsin.

Names of User: Clasen Quality Chocolates

Address of User: 420 E. Horseshoe Road

Authorized Representative of User: Tony Forman

Title of Authorized Representative: Engineering Manager

Telephone Number: 608-467-3786

Business Activity: SUGAR & CONFECTIONERY PRODUCTS

Primary SIC No.: 2060

The above-named user hereby requests to discharge wastewater into the City of Watertown wastewater facilities at the following location:

800 Hoffmann Dr
Watertown, WI 53094

As specified in Chapter 508, Section 508-9 (j)2. of Watertown's Municipal Code, the applicant must include the following information in the permit application:

1. Name, address, and location (if different from the address).
N/a
2. SIC number according to the Standard Industrial Classification Manual, Bureau of the Budget, 1971, as amended.
2060
3. Wastewater constituents and characteristics, including but not limited to, those mentioned in Chapter 508-8 of Watertown's Municipal Code, as determined by a reliable analytical laboratory; sampling and analysis shall be performed in accordance with procedures established by the EPA and contained in 40 CFR, Part 136, as amended.

See attached example report titled Analytical Report (March 24 2026).

4. Time and duration of wastewater contribution.

The facility typically contributes wastewater continuously every day.

5. Average daily and 30-minute peak wastewater flow rates, including daily, monthly, and seasonal variations, if any.

Average Daily Usage (2020) = 6,939 Gal
Average Monthly Usage (2020) = 201,006 Gal
No significant seasonal variations.

6. Site plans, floor plans, mechanical and plumbing plans and details to show all sewers, sewer connections, and appurtenances by size, location and elevation.

See attachments titled Wastewater Pre-Treatment Plans and P&ID

7. General description of activities, facilities, and plant processes on the premises, including all materials which are or could be discharged.

Processing of ingredients (cocoa, sugar, fats, flavorings) to produce chocolate and confectionary coatings.

8. The nature and concentration of any pollutants in the discharge which are limited by Chapter 508 of Watertown's Municipal Code (Chapter 508) and a statement regarding whether or not compliance is being achieved with Chapter 508 on a consistent basis and, if not, whether additional operation and maintenance and/or additional pretreatment is required for the user to comply with Chapter 508.

The facility is compliant with Chapter 508 of Watertown's Municipal Code. Samples are taken 2 x per week and sent to external lab for analysis. Results available upon request.

9. If additional pretreatment and/or operation and maintenance will be required to comply with Chapter 508, the industrial user shall submit the shortest schedule by which the user will provide such additional pretreatment and/or implementation of additional operation and maintenance activities.
 - a. The schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for the industrial user to comply with the requirements of Chapter 508, including, but not limited to dates relating to hiring an engineer, completing preliminary plans, completing final plans, executing contract for major components, commencing construction, completing construction, and all other activities necessary to achieve compliance

with Chapter 508.

- b. No time increment for any single activity directed toward compliance shall exceed nine (9) months.
 - c. No later than 14 days following each date in the schedule and the final date for compliance, the industrial user shall submit a progress report to the Superintendent including, as a minimum, whether or not the industrial user complied with the increment of progress to be met on such date and, if not, the date on which the industrial user expects to comply with this increment of progress, the reason for delay, and the steps being taken by the industrial user to return the construction to the schedule established. In no event shall more than nine (9) months elapse between such progress reports to the Superintendent.
10. Each product produced by type, amount, process or processes and rate of production.

Chocolate and confectionary coatings: 250,000,000 lbs/yr
 11. Type and amount of raw materials processed (average and maximum per day).

Types: Sugars, cocoa products, fats, flavors

Average: 600,000 lbs/day
Max: 1,000,000 lbs day
 12. Number of employees and hours of operation of plant and proposed or actual hours of operation of pretreatment system.

Employees = 230 FTE
Hours of Operation = 8,496 hrs/yr ((365 days – 11 holidays) x 24 hours/day)

In consideration of the granting of this permit, the undersigned agrees:

1. To furnish any additional information relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the City.
2. To accept and abide by all provisions of Chapter 508 of the Watertown Municipal Code, and of all other pertinent municipal ordinances or regulations that may be adopted in the future.
3. To operate and maintain, in an efficient manner at all times and at no expense to the City, any waster pretreatment facilities, as may be required as a condition of acceptance into the wastewater facilities of the industrial wastes involved.

Industrial Wastewater Discharge Permit
No. 1010-03

In compliance with provisions of Chapter 508 of the Municipal Code of Watertown

Clasen Quality Coatings, Inc
420 East Horseshoe Road
Watertown, Wisconsin 53094

is hereby authorized to discharge industrial wastewater from the above identified facility into the City of Watertown Sanitary Sewer System in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

All discharge authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any substance identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on the date of signature and expires at midnight, June 30, 2031

The terms and conditions of this permit may be subject to modification by the City of Watertown at any time, as limitations or requirements as identified in Chapter 508-9 J(5) of the Municipal Code of Watertown are modified or other just cause exists.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after the expired date, an application shall be filed for re-issuance of this permit in accordance with the requirements of Chapter 508 of the Municipal Code of Watertown, at least 180 days prior to the expiration date.

By:

Peter Hartz
Water Systems Manager

Dated this 1st day of July 2026.

Part 1 - APPLICABLE EFFLUENT LIMITATIONS

SECTION 1 - City of Watertown Pretreatment Standards

A. All wastewaters discharged to the City of Watertown Wastewater Treatment Plant (WWTP) shall not exceed the following limitations:

<u>Parameter</u>	<u>Maximum Allowable Concentration (mg/l)</u>
Arsenic	0.15
Cadmium	0.50
Chromium (Total)	2.60
Copper	1.50
Cyanide	2.30
Free Acids and Alkalis – pH range 5.0 to 9.5 su	10.00
Lead	0.50
Mercury	<0.0002
Molybdenum	0.10
Nickel	3.50
Oil, Grease, Etc. (Hexane Soluble)	100.00
Selenium	0.24
Silver	5.00
Zinc	5.00

B. The permittee may not discharge any substance which will cause the Wastewater Treatment Plant to violate its WPDES and/or state disposal system permit or the receiving water quality standards.

C. The permittee may not discharge any pollutants, including oxygen demanding pollutants (B.O.D.5, etc.), at a flow rate and/or pollutant concentration so as to constitute a slug and/or that which may cause interferences with the Wastewater Treatment Plant.

1. General Prohibitions

- General prohibition against interference: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works (POTW) which, alone or in conjunction with discharges from other sources, inhibit or disrupt treatment processes or operations; or inhibit or disrupt sludge processes, use, or disposal. Such interference is demonstrated when as a result of the industry(s) discharge the publicly owned treatment works violates any requirements of its discharge permit (including an increase in the magnitude or duration of a violation), or when the publicly owned treatment work's selected method of sludge usage or disposal is limited.
- General prohibition against pass through: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works which, alone or in conjunction with discharges from other sources, pass through the treatment works into receiving waters in concentrations or quantities which cause a violation of any requirement of the treatment works discharge permit (including an increase in the magnitude or duration of a violation).

- General prohibition against dilution: (Wis. Adm. Code NR 211.13)
No industry may increase the use of water or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with any pretreatment standard or requirement.
 - General prohibition against pretreatment system bypass: (Wis. Adm. Code NR 211.19)
No industry may intentionally divert waste streams from any portion of the pretreatment system facility except where bypass is unavoidable to prevent loss of life, personal injury, or severe property damage and there was no feasible alternatives to bypass. Bypasses which are for essential maintenance, and which do not cause violations of pretreatment standards may be allowed.
2. Specific Prohibitions – No industry may discharge the following pollutants into a POTW: (Wis. Adm. Code NR 211.10)
- Pollutants which create or contribute to a fire or explosion hazard in the POTW, including but not limited to: waste streams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.61.
 - Pollutants listed in Wisconsin Administrative Code Chapter NR 661.
 - Pollutants which will cause or contribute to corrosive structural damage to the POTW but in no case discharges with a pH lower than 5.0 unless the POTW is specifically designed to accommodate such discharges;
 - Solid or viscous pollutants in amounts which will cause or contribute to obstruction to the flow in sewers or other interference with the operation of the POTW.
 - Any pollutant, including oxygen demanding pollutants, released in a discharge of such volume or strength as to cause or contribute to interference in the POTW; or
 - Heat in amounts which will inhibit or contribute to the inhibition of biological activity in the POTW treatment plant resulting in interference or causing damage to the POTW, but in no case heat in such quantities that the temperature exceeds 40°C (104°F) at the influent to the POTW treatment plant unless the Department, at the request of the POTW, has approved alternate temperature limits.
 - Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin an amount that will cause interference or pass through;
 - Pollutants which results in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

- Any trucked or hauled pollutants, except at discharge points designated by the POTW.
- The permittee may not discharge any wastewaters containing fats, wax, grease, petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, whether emulsified or not, in excess of one hundred (100) mg/L or containing substances which may solidify or become viscous at temperatures between thirty-two degrees (32°) Fahrenheit and one hundred forty degrees (140°) Fahrenheit (0° and 60° Centigrade).

D. In addition, the permittee shall comply with all other applicable regulations and standards contained in Chapter 508 of the Municipal Code of Watertown.

1. Notification of Accidental Discharge

- In the case of an accidental discharge, it is the responsibility of the permittee to immediately telephone and notify the city of the incident. During working hours of 7:00 a.m. to 3:00 p.m., call the WWTP at 920-262-4085. After hours, call 920-285-4088 and talk with Peter Hartz. If you cannot talk to Mr. Hartz, directly email Mr. Hartz at phartz@watertownwi.gov. The notification shall include location of discharge, type of waste, concentration, and volume. Furthermore, such industrial user shall take immediate action to contain and minimize the accidental discharge to the wastewater facilities and notify the City of the corrective actions.
- Within five (5) days following an accidental discharge, the industrial user shall submit to the WWTP Water Systems Manager a detailed written report describing the cause of the discharge and the measures to be taken by the user to prevent similar further occurrences. Such notification shall not relieve the user of any expense, loss, damage, or such liability which may be incurred as a result of damage to the wastewater facilities, fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liability which may be imposed by this article or other applicable law.

2. Notice to Employees

- A notice shall be permanently posted on the industrial user's bulletin board or other prominent places advising employees who to call in the event of a dangerous discharge. Employers shall ensure that all employees who may cause such a dangerous discharge to occur, or who may suffer from such a discharge, are advised of the emergency notification procedure.

E. Under Section 508-16 (A) of the Municipal Code of Watertown, a surcharge shall be assessed any user discharging wastewater to the Watertown Wastewater Treatment Plant that contains Total B.O.D. in concentrations exceeding 175 mg/L Total Suspended Solids in concentrations exceeding 170 mg/l, Total phosphorus in concentrations exceeding 6 mg/L and Ammonia Nitrogen in concentrations exceeding 25 mg/L. The costs shall be assessed as specified in Section 508-16 (A).

SECTION 2 - EPA Categorical Pretreatment Standards

The permittee discharges certain wastewaters which also are subject to regulation by the following EPA categorical pretreatment standards:

- A. 40 CFR 403 General Pretreatment Regulations for existing and new sources of pollution.

SECTION 3 - Specific Applicable Effluent Limitations

Based upon the standards identified in Sections 1 and 2, the applicable effluent limitations for Clasen Quality Coatings Sampling Manhole / Outfall 420 is as follows:

A. Sampling Manhole / Outfall 420

1. Beginning upon the effective date of this permit and extending to midnight June 30, 2031, all wastewater discharged to the City of Watertown sanitary sewer system through Sampling Manhole / Outfall 420 shall be subject to the following Target Values. In the event of wastewater treatment plant disruption, the City, upon prior notice to the permittee, *may enforce the target values as effluent limitations*. However, the target values noted below will be used to establish charges to the permittee under the Industrial Cost Recovery Act based residential limits in Chapter 508 of the Municipal Code of Watertown.
(Note: weekly average = Sunday to Saturday)

- 5-day B.O.D. (Weekly avg.) 850 pounds/day
- 5-day B.O.D. (Daily maximum) - 1,000 pounds/day
- 5-day B.O.D. (Daily avg.) 175 mg/L
- Total Suspended Solids (Weekly avg.) 170 mg/L
- Total Phosphorus (Weekly avg.) 6 mg/L
- Ammonia Nitrogen (Weekly avg.) 25 mg/L
- Oil, Grease, Etc. (Hexane Solubles) – Shall not exceed 100.00 mg/L
- pH (Daily - 5.0 to 9.5)

Notes:

- Industrial user charges will be based on Monthly discharges.
- Sampling Manhole / Outfall 420 as designated on the attached schematics is the sampling manhole on the sewer lateral.
- Samplers will start on Monday and Wednesday morning and continue for 24 hours. The sample will be collected Tuesday and Thursday morning and delivered to the Laboratory doing testing in a cooler and on ice by 8:00 am of collection day or to outside lab for set-up the day sample was taken. if sample can't be delivered by 8:00 am, a call to Watertown Wastewater plant will be made to make other arrangements.

- If there is a malfunction of sampler the sample dates will be the following day. All sampling date changes will require Clasen Quality Coatings to call the City Wastewater Plant and inform them of the change.
- When a new Parameter is added to the permit in accordance with Chapter 508-9 J(4) of the Municipal Code of Watertown, and all costs will be charged as of the date signed on Addendum and all costs will be charged on as of date signed on Addendum.
- B. O. D stands for Biological Oxygen Demand 5-day Test
- The permittee may request by letter to the Watertown WWTP a lesser frequency of testing after a pattern of consistent results are achieved. Each request will be reviewed by WWTP personnel, and a determination will be made. This is solely the judgment of the WWTP personnel.

Part 2 - MONITORING AND REPORTING REQUIREMENTS

SECTION 1 - Monitoring Requirements

A. Beginning with the signing date of this permit and thereafter, the permittee shall monitor its wastewater discharges from Sampling Manhole / Outfall 420 for the parameters, sampling frequency, and sample types as specified:

<u>Parameter</u>	<u>Units</u>	<u>Sample Frequency*</u>	<u>Sample Type</u>
B.O.D.	mg/L	Tuesday, Thursday	24 hr. FPC
S.S.	mg/L	Tuesday, Thursday	24 hr. FPC
Total Phosphorus	mg/L	Tuesday, Thursday	24 hr. FPC
Ammonia Nitrogen	mg/L	Tuesday, Thursday	24 hr. FPC
Oil, Grease, Etc. (H)	mg/L	Tuesday, Thursday	24 hr. FPC
B.O.D.	lbs/day	Tuesday, Thursday	Composite
SS	lbs/day	Tuesday, Thursday	Composite
Total Phosphorus	lbs/day	Tuesday, Thursday	Composite
Ammonia Nitrogen	lbs/day	Tuesday, Thursday	Composite
pH	S.U.	Tuesday, Thursday	1 Grab / Day
Flow	gal/day	Daily	

*May be required to perform Daily Sample Frequency with notification by Wastewater Water Systems Manager.

Note: BOD is 5-day biological oxygen demand, and TSS is total suspended solids
 FPC = flow proportional composite

- B. Laboratory analysis of samples collected shall be performed in accordance with "Standard Methods for the Examination of Water and Wastewater" as approved in NR 219, with 40 CFR Part 136 of the Federal Code of Regulations dated July 1, 2015, and amendments, thereto. Holding and preservation of collected samples shall be as specified in 40 CFR, part 136 and amendments, thereto.
- C. The City will conduct its own sampling program of the permittee's wastewater discharge. This sampling may or may not take place without formal notification. All sampling will be conducted after Clasen Quality Coatings is informed of our presence between 7:00 am and 3:00 pm.

SECTION 2 - Reporting Requirements

- A. Monitoring results obtained during each week shall be reported to the Wastewater Treatment Plant Water Systems Manager Wastewater by no later than the 15 days after each week's sampling.
- B. If the permittee monitors any pollutant more frequently than required by this permit, the results of such monitoring shall be submitted to the City's WWTP.
- C. Monitoring reports shall be signed and sworn to by an Authorized Representative, or their designee.
- D. Monitoring reports shall also contain type of sampling (grab or composite), time intervals of grab sample, the name of individual(s) who did actual sampling, the names of laboratories if more than one, and the names of individuals who completed the report if different than the Authorized Representative or their designee.

If sampling performed by an industrial user indicates a violation of levels in excess of Part 1, Section 3A of this permit, the user shall notify the Wastewater Facilities within 24 hours of becoming aware of the violation. The permittee shall provide the following information in writing to the Water Systems Manager of the WWTP within five (5) working days of becoming aware of such condition:

1. A description of the discharge and cause of the noncompliance; and
 2. The exact dates and times of noncompliance; and if not corrected, the anticipated duration of noncompliance, and steps being taken to reduce, eliminate, and prevent recurrence of the non-complying discharge.
- E. Noncompliance reports are required for any discharger which experiences a slug or accidental discharge or experiences an upset in operations which places the discharger in a temporary state of noncompliance with the Wastewater Facilities Ordinance or a wastewater discharge permit issued pursuant hereto. The discharger shall inform the Assistant Water Systems Manager Wastewater thereof immediately of first awareness of the commencement of the slug, accidental discharge or upset. Early notification may enable countermeasures to be taken by the Assistant Water Systems Manager Wastewater to minimize damage to the Wastewater Facilities and the receiving waters. The notification shall include location of discharge, type of waste, concentration and volume, and corrective actions. The city may choose to immediately take action pursuant to the Wastewater Facilities Ordinance. Within five (5) days following an accidental discharge, the discharger shall submit to the Assistant Water Systems Manager Wastewater a detailed written report. The report shall specify:
1. Description and cause of the upset, slug or accidental discharge, the cause thereof, and the impact on the discharger's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.
 2. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur.

3. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset, slug, accidental discharge, or other conditions of noncompliance.
 4. The permittee shall subsequently submit a report containing analytical data demonstrating return to compliance.
- F. The industrial user shall notify the Wastewater Facilities, the EPA Region V Waste Management Division Director, and the DNR Bureau of Solid Waste Management in writing of any discharge into the Wastewater Facilities treatment system of a substance, which, if otherwise disposed of, would be hazardous waste under 40 CFR Part 261. The notification of hazardous waste discharge shall be in accordance with Chapter 508-9 I(5) of the Wastewater Facilities Ordinance. The industrial user shall certify that it has a program to reduce the volume and toxicity of hazardous waste generated to the degree it has determined to be economically practical.
- G. All reports required by this permit shall be submitted to:

Wastewater Treatment Plant
 Attention: Water Systems Manager
 P.O. Box 477
 Watertown, WI 53094

SECTION 3 – Pre-Treatment and Monitoring Facilities Compliance Schedule

- A. The permittee shall provide the necessary wastewater pretreatment to comply with the target values identified in Part 1, Section 3.

Part 3 - GENERAL CONDITIONS

In addition to compliance with Parts 1 and 2, this permit is issued conditioned upon compliance with the following general conditions. Violation of any of the permit conditions below, either alone or in conjunction with a violation of Parts 1 or 2 shall be adequate basis for the revocation of this permit.

A. Pretreatment Fee Schedule

1. Administrative Fee: \$175/sampling of permittee wastewater discharge.
2. Sampling Charge: \$250/sampling day for 24-hour composite sample and/or \$30 for grab sample.
3. Laboratory Analysis Charge: charges incurred by outside or at plant testing laboratory.
4. Any additional fees: Fee for reviewing accidental discharge procedures And pretreatment construction will be \$300.
5. The above fee schedule may be changed only with prior written notification by the City of Watertown.

B. Right of Entry

The permittee shall, after reasonable notification by the City of Watertown WWTP, allow the City of Watertown WWTP or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the permittee at all reasonable hours for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling include any time the permittee is operating any process which results in a process of wastewater discharge to the City of Watertown WWTP usually between 7:00 am and 3:00 pm.

C. Record Retention

The permittee shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence, and all summaries thereof, relating to monitoring, sampling, and chemical analyses made by or on behalf of a user in connection with its discharge. All records, which pertain to matters which are the subject to any enforcement or litigation activities brought by the City pursuant hereto, shall be retained and preserved by the user until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

D. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid; the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

E. Confidential Information

Except for data determined to be confidential under Chapter 508-9 (M) of the Municipal Code of Watertown, all reports required by this permit shall be available for public inspection at the Watertown WWTP.

F. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

1. The exact place, date, and time of sampling;
2. The dates of the analysis were performed;
3. The person(s) who perform the analyses;
4. The analytical techniques or methods used; and
5. The results of all required analysis.

G. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of The State Wisconsin as well as being subjected to civil penalties and relief.

H. Modifications or Revision of Permit

1. The terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified in Chapter 508-9 J(5) of the City Municipal Code are modified or other just cause exists.
2. This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.
3. Any modification which results in new conditions in the permit shall include a reasonable time schedule for compliance, if necessary.
4. The Permittee reserves the right to request review or termination of this permit or its subsections in the event of a change in operating parameters or other unforeseen circumstances which make this permit or subsections no longer adequate or relevant. Such request shall be submitted in writing to The City of Watertown WWTP.

I. Dilution

No permittee shall ever increase the use of process water or, in any way; attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the categorical pretreatment standards, or in any other pollutant-specified limitation developed by the City of Watertown or State of Wisconsin. (Comment: blending may be an acceptable means of complying with some of the prohibitions set forth in subsection 508-8 (C) of the City of Watertown Code e.g. pH prohibition). The Wastewater Facilities may impose mass limitations on industrial users which are suspected of using dilution to meet applicable pretreatment standards or requirements or in other cases where the imposition of mass limitations is appropriate.

J. Notification of Changed Discharge

All industrial users shall promptly notify the Wastewater Facilities in advance of any change in its industrial operations which may have an effect upon the waste and wastewaters generated or any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the industrial user has submitted initial notification pursuant to Chapter 508-9 J of the Municipal Code of Watertown. In such event, the Wastewater Facilities may add to, change, or modify the conditions of the permit in accordance with Chapter 508-9 J of the Municipal Code of Watertown.

K. Proper Disposal of Pretreatment Sludge

The disposal of sludge generated within wastewater pretreatment systems shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

L. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or Chapter 508 of the Municipal Code of Watertown, shall inform the City immediately of the first awareness of the commencement of the upsets in accordance with requirements in Chapter 508-9 I of the Municipal Code of Watertown.

M. Slug Discharge Control Plan

The Wastewater Facilities will evaluate at least once every two years whether each significant industrial user needs a plan to control slug discharges. If the Wastewater Facilities determines that a slug control plan is needed, the plan shall be developed in accordance with the requirements contained in Chapter 508-9 I(4) of the Municipal Code of Watertown.

N. Publication of Noncompliance

A list of industrial users which, at any time during the previous twelve months, were in significant noncompliance with applicable pretreatment requirements shall be annually published in the local newspaper. The notification shall also summarize any enforcement actions taken against the user during the same 12-month period. Details on the criteria for a significant violator are covered in Chapter 508-9 K(2) of the Municipal Code of Watertown. For Industries not part of Federal Pretreatment requirements and only issued permit to enforce the Municipal Code of Watertown Chapter 508 as it relates to Industrial cost recovery will not be published in paper for those violations. Unless violation is egregious that notification is required. This will be decided by Watertown WWTP personnel.

O. Civil and Criminal Penalties

Any user of Wastewater Treatment Plant and collection system who is found to have violated an order of the Public Works Committee or who willfully or negligently failed to comply with any provisions of Chapter 508 of Municipal Code of Watertown, and orders, rules, regulations and permits issued hereunder, shall be subject to fines as established in Chapter 508-10 (E) of the Municipal Code of Watertown.

P. Permit Transfer

Wastewater discharge permits are issued to a specified industrial user for a specified operation. A wastewater discharge permit shall not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall comply also with the terms and conditions of the existing permit.

Q. Signatory Requirements

All reports required by this permit shall be signed by a principal executive officer of the permittee, or his designee.

R. Reporting Address: All reports required by this permit shall be submitted to;

Water Systems Manager
P.O. Box 477
Watertown, WI 53094

TEI CORPORATION
 325 East Chicago Street
 Milwaukee, Wisconsin 53202
 (414)-291-8850
 FAX 291-8841

- CONSTRUCTION MANAGEMENT
- DESIGN FUNCTIONS
- DESIGN BUILD
- GENERAL CONTRACTING
- BIDDING ASSISTANCE
- SYSTEM OPERATIONS
- FACILITY ENGINEERING
- COMMISSIONING

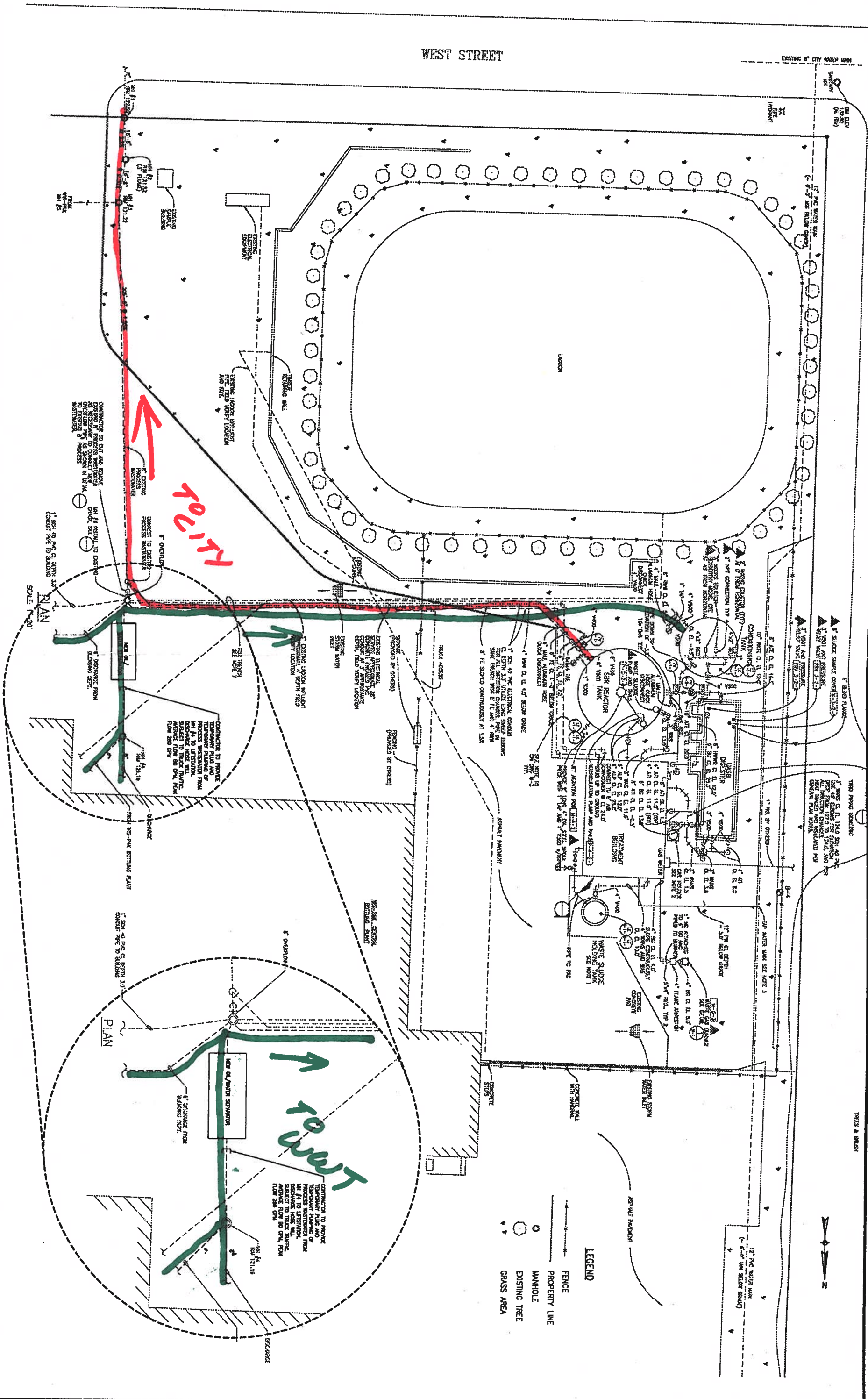
VERIFY SCALE
 BAR IS ONE INCH ON ORIGINAL DRAWING.
 0 = ORIGINAL DRAWING
 1" = NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

NO.	DATE	REVISION	BY	APPD.

WIS-PAK, INC.
 WATERTOWN BOTTLING PLANT
 WATERTOWN, WISCONSIN

MECHANICAL
 SITE PLAN

SHEET NO.	DWG NO.	DATE	PROJ.



LEGEND

- FENCE
- PROPERTY LINE
- MANHOLE
- EXISTING TREE
- GRASS AREA

RHS & BROWN

Industrial Wastewater Discharge Permit
No. 0685-03

In compliance with provisions of Chapter 508 of the Municipal Code of Watertown

Wis-Pak Inc.
860 West Street
Watertown, Wisconsin 53094

is hereby authorized to discharge industrial wastewater from the above identified facility into the City of Watertown Sanitary Sewer System in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

All discharge authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any substance identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on the date of signature and expires at midnight, June 30, 2031

The terms and conditions of this permit may be subject to modification by the City of Watertown at any time, as limitations or requirements as identified in Chapter 508-9 J(5) of the Municipal Code of Watertown are modified or other just cause exists.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after the expired date, an application shall be filed for re-issuance of this permit in accordance with the requirements of Chapter 508 of the Municipal Code of Watertown, at least 180 days prior to the expiration date.

By:

Peter Hartz
Water Systems Manager

Dated this 1st day of July 2026.

Part 1 - APPLICABLE EFFLUENT LIMITATIONS

SECTION 1 - City of Watertown Pretreatment Standards

A. All wastewater discharged to the City of Watertown Wastewater Treatment Plant (WWTP) shall not exceed the following limitations:

<u>Parameter</u>	<u>Maximum Allowable Concentration (mg/l)</u>
Arsenic	0.15
Cadmium	0.50
Chromium (Total)	2.60
Copper	1.50
Cyanide	2.30
Free Acids and Alkalis – pH range 5.0 to 9.5 su	10.00
Lead	0.50
Mercury	<0.0002
Molybdenum	0.10
Nickel	3.50
Oil, Grease, Etc. (Hexane Solubles)	100.00
Selenium	0.24
Silver	5.00
Zinc	5.00

B. The permittee may not discharge any substance which will cause the Wastewater Treatment Plant to violate its WPDES and/or state disposal system permit or the receiving water quality standards.

C. The permittee may not discharge any pollutants, including oxygen demanding pollutants (B.O.D.5, etc.), at a flow rate and/or pollutant concentration so as to constitute a slug and/or that which may cause interferences with the Wastewater Treatment Plant.

1. General Prohibitions

- General prohibition against interference: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works (POTW) which, alone or in conjunction with discharges from other sources, inhibit or disrupt treatment processes or operations; or inhibit or disrupt sludge processes, use, or disposal. Such interference is demonstrated when as a result of the industry(s) discharge the publicly owned treatment works violates any requirements of its discharge permit (including an increase in the magnitude or duration of a violation), or when the publicly owned treatment work's selected method of sludge usage or disposal is limited.
- General prohibition against pass through: (Wis. Adm. Code NR 211.03 & 211.10)
No industry may discharge pollutants into a publicly owned treatment works which, alone or in conjunction with discharges from other sources, pass through the treatment works into receiving waters in concentrations or quantities which cause a violation of any requirement of the treatment works discharge permit (including an increase in the magnitude or duration of a violation).

- General prohibition against dilution: (Wis. Adm. Code NR 211.13)
No industry may increase the use of water or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with any pretreatment standard or requirement.
 - General prohibition against pretreatment system bypass: (Wis. Adm. Code NR 211.19)
No industry may intentionally divert waste streams from any portion of the pretreatment system facility except where bypass is unavoidable to prevent loss of life, personal injury, or severe property damage and there were no feasible alternatives to bypass. Bypasses which are for essential maintenance, and which do not cause violations of pretreatment standards may be allowed.
2. Specific Prohibitions – No industry may discharge the following pollutants into a POTW: (Wis. Adm. Code NR 211.10)
- Pollutants which create or contribute to a fire or explosion hazard in the POTW, including but not limited to waste streams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.61.
 - Pollutants listed in Wisconsin Administrative Code Chapter NR 661.
 - Pollutants which will cause or contribute to corrosive structural damage to the POTW but in no case discharges with a pH lower than 5.0 unless the POTW is specifically designed to accommodate such discharges;
 - Solid or viscous pollutants in amounts which will cause or contribute to obstruction to the flow in sewers or other interference with the operation of the POTW.
 - Any pollutant, including oxygen demanding pollutants, released in a discharge of such volume or strength as to cause or contribute to interference in the POTW; or
 - Heat in amounts which will inhibit or contribute to the inhibition of biological activity in the POTW treatment plant resulting in interference or causing damage to the POTW, but in no case heat in such quantities that the temperature exceeds 40°C (104°F) at the influent to the POTW treatment plant unless the Department, at the request of the POTW, has approved alternate temperature limits.
 - Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin an amount that will cause interference or pass through;
 - Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

- Any trucked or hauled pollutants, except at discharge points designated by the POTW.
- The permittee may not discharge any wastewaters containing fats, wax, grease, petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, whether emulsified or not, in excess of one hundred (100) mg/L or containing substances which may solidify or become viscous at temperatures between thirty-two degrees (32°) Fahrenheit and one hundred forty degrees (140°) Fahrenheit (0° and 60° Centigrade).

D. In addition, the permittee shall comply with all other applicable regulations and standards contained in Chapter 508 of the Municipal Code of Watertown.

1. Notification of Accidental Discharge

- In the case of an accidental discharge, it is the responsibility of the permittee to immediately telephone and notify the city of the incident. During working hours of 7:00 a.m. to 3:00 p.m., call the WWTP at 920-262-4085. After hours, call 920-285-4088 and talk with Peter Hartz. If you cannot talk to Mr. Hartz, directly email Mr. Hartz at phartz@watertownwi.gov. The notification shall include location of discharge, type of waste, concentration, and volume. Furthermore, such industrial user shall take immediate action to contain and minimize the accidental discharge to the wastewater facilities and notify the City of the corrective actions.
- Within five (5) days following an accidental discharge, the industrial user shall submit to the WWTP Water Systems Manager a detailed written report describing the cause of the discharge and the measures to be taken by the user to prevent similar further occurrences. Such notification shall not relieve the user of any expense, loss, damage, or such liability which may be incurred as a result of damage to the wastewater facilities, fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liability which may be imposed by this article or other applicable law.

2. Notice to Employees

- A notice shall be permanently posted on the industrial user's bulletin board or other prominent places advising employees who to call in the event of a dangerous discharge. Employers shall ensure that all employees who may cause such a dangerous discharge to occur, or who may suffer from such a discharge, are advised of the emergency notification procedure.

E. Under Section 508-16 (A) of the Municipal Code of Watertown, a surcharge shall be assessed any user discharging wastewater to the Watertown Wastewater Treatment Plant that contains Total B.O.D. in concentrations exceeding 175 mg/L Total Suspended Solids in concentrations exceeding 170 mg/l, Total phosphorus in concentrations exceeding 6 mg/L and Ammonia Nitrogen in concentrations exceeding 25 mg/L. The costs shall be assessed as specified in Section 508-16 (A).

SECTION 2 - EPA Categorical Pretreatment Standards

The permittee discharges certain wastewater which also is subject to regulation by the following EPA categorical pretreatment standards:

- A. 40 CFR 403 General Pretreatment Regulations for existing and new sources of pollution.

SECTION 3 - Specific Applicable Effluent Limitations

Based upon the standards identified in Sections 1 and 2, the applicable effluent limitations for Wis-Pak Outfall NR101/1 are as follows:

A. Outfall NR 101/1

1. Beginning upon the effective date of this permit and extending to midnight June 30, 2031, all wastewater discharged to the City of Watertown sanitary sewer system through Outfall NR 101/1 shall be subject to the following Target Values. In the event of wastewater treatment plant disruption, the City, upon prior notice to the permittee, *may enforce the target values as effluent limitations*. However, the target values noted below will be used to establish charges to the permittee under the Industrial Cost Recovery Act based on residential limits in Chapter 508 of the Municipal Code of Watertown.

(Note: weekly average = Sunday to Saturday)

- 5-day B.O.D. (Weekly avg.) 850 pounds/day
- 5-day B.O.D. (Daily maximum) - 1,000 pounds/day
- 5-day B.O.D. (Daily avg.) 175 mg/L
- Total Suspended Solids (Weekly avg.) 170 mg/L
- Total Phosphorus (Weekly avg.) 6 mg/L
- Ammonia Nitrogen (Weekly avg.) 25 mg/L
- Oil, Grease, Etc. (Hexane Solubles) – Shall not exceed 100.00 mg/L
- pH (Daily - 5.0 to 9.5)

Notes:

- Outfall NR 101/1 as designated on the attached schematics is the sampling location on the sewer lateral.
- Industrial user charges will be based on Monthly discharges.
- Samplers will start on Wednesday morning and continue for 24 hours. The sample will be collected Thursday morning and delivered to the Laboratory doing testing in a cooler and on ice by 8:00 am of collection day or to outside lab for set-up the day sample was taken. If sample can't be delivered by 8:00 am, a call to Watertown Wastewater plant will be made to make other arrangements.

- If there is a malfunction of sampler the sample dates will be the following day. All sampling date changes will require Wis-Pak to call the City Wastewater Plant and inform them of the change.
- When a new Parameter is added to the permit in accordance with Chapter 508-9 J(4) of the Municipal Code of Watertown, and all costs will be charged as of the date signed on Addendum and all costs will be charged on as of date signed on Addendum.
- B. O. D stands for Biological Oxygen Demand 5-day Test
- The permittee may request by letter to the Watertown WWTP a lesser frequency of testing after a pattern of consistent results are achieved. Each request will be reviewed by WWTP personnel, and a determination will be made. This is solely the judgment of the WWTP personnel.

Part 2 - MONITORING AND REPORTING REQUIREMENTS

SECTION 1 - Monitoring Requirements

A. Beginning with the signing date of this permit and thereafter, the permittee shall monitor its wastewater discharges from Outfall NR 101/1 for the parameters, sampling frequency, and sample types as specified:

<u>Parameter</u>	<u>Units</u>	<u>Sample Frequency*</u>	<u>Sample Type</u>
B.O.D.	mg/L	Thursday	24 hr. FPC
S.S.	mg/L	Thursday	24 hr. FPC
Total Phosphorus	mg/L	Thursday	24 hr. FPC
Ammonia Nitrogen	mg/L	Thursday	24 hr. FPC
Oil, Grease, Etc. (H)	mg/L	Thursday	24 hr. FPC
B.O.D.	lbs/day	Thursday	Composite
SS	lbs/day	Thursday	Composite
Total Phosphorus	lbs/day	Thursday	Composite
Ammonia Nitrogen	lbs/day	Thursday	Composite
pH	S.U.	Thursday	Grab / Discharge Day
Flow	gal/day	Daily	

*May be required to perform Daily Sample Frequency with notification by Water Systems Manager. Note – If Wis-Pak’s pretreatment plant is shut down or maintenance needs to be performed Daily sampling will resume.

Note: BOD is 5-day biological oxygen demand, and TSS is total suspended solids
FPC = flow proportional composite

B. Laboratory analysis of samples collected shall be performed in accordance with "Standard Methods for the Examination of Water and Wastewater" as approved in NR 219, with 40 CFR Part 136 of the Federal Code of Regulations dated July 1, 2015, and amendments, thereto. Holding and preservation of collected samples shall be as specified in 40 CFR, part 136 and amendments, thereto.

- C. The City will conduct its own sampling program of the permittee's wastewater discharge. This sampling may or may not take place without formal notification. All samplings will be conducted after Wis-Pak is informed of our presence between 7:00 am and 3:00 pm.

SECTION 2 - Reporting Requirements

- A. Monitoring results obtained during each week shall be reported to the Water Systems Manager no later than 15 days after each week's sampling.
- B. If the permittee monitors any pollutant more frequently than required by this permit, the results of such monitoring shall be submitted to the City's WWTP.
- C. Monitoring reports shall be signed and sworn to by an Authorized Representative, or their designee.
- D. Monitoring reports shall also contain type of sampling (grab or composite), time intervals of grab sample, the name of individual(s) who did actual sampling, the names of laboratories if more than one, and the names of individuals who completed the report if different than the Authorized Representative or their designee.

If sampling performed by an industrial user indicates a violation of levels in excess of Part 1, Section 3A of this permit, the user shall notify the Wastewater Facilities within 24 hours of becoming aware of the violation. The permittee shall provide the following information in writing to the Water Systems Manager of the WWTP within five (5) working days of becoming aware of such condition:

1. A description of the discharge and cause of the noncompliance; and
 2. The exact dates and times of noncompliance; and if not corrected, the anticipated duration of noncompliance, and steps being taken to reduce, eliminate, and prevent recurrence of the non-complying discharge.
- E. Noncompliance reports are required for any discharger which experiences a slug or accidental discharge or experiences an upset in operations which places the discharger in a temporary state of noncompliance with the Wastewater Facilities Ordinance or a wastewater discharge permit issued pursuant hereto. The discharger shall inform the Water Systems Manager thereof immediately of first awareness of the commencement of the slug, accidental discharge or upset. Early notification may enable countermeasures to be taken by the Water Systems Manager to minimize damage to the Wastewater Facilities and the receiving waters. The notification shall include location of discharge, type of waste, concentration and volume, and corrective actions. The city may choose to immediately take action pursuant to the Wastewater Facilities Ordinance. Within five (5) days following an accidental discharge, the discharger shall submit to the Water Systems Manager a detailed written report. The report shall specify:
1. Description and cause of the upset, slug or accidental discharge, the cause thereof, and the impact on the discharger's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.

2. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur.
 3. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset, slug, accidental discharge, or other conditions of noncompliance.
 4. The permittee shall subsequently submit a report containing analytical data demonstrating return to compliance.
- F. The industrial user shall notify the Wastewater Facilities, the EPA Region V Waste Management Division Director, and the DNR Bureau of Solid Waste Management in writing of any discharge into the Wastewater Facilities treatment system of a substance, which, if otherwise disposed of, would be hazardous waste under 40 CFR Part 261. The notification of hazardous waste discharge shall be in accordance with Chapter 508-9 (l) (5) of the Wastewater Facilities Ordinance. The industrial user shall certify that it has a program to reduce the volume and toxicity of hazardous waste generated to the degree it has determined to be economically practical.
- G. All reports required by this permit shall be submitted to:

Wastewater Treatment Plant
Attention: Water Systems Manager
P.O. Box 477
Watertown, WI 53094

SECTION 3 – Pre-Treatment and Monitoring Facilities Compliance Schedule

- A. The permittee shall provide the necessary wastewater pretreatment to comply with the target values identified in Part 1, Section 3.

Part 3 - GENERAL CONDITIONS

In addition to compliance with Parts 1 and 2, this permit is issued conditioned upon compliance with the following general conditions. Violation of any of the permit conditions below, either alone or in conjunction with a violation of Parts 1 or 2 shall be adequate basis for the revocation of this permit.

A. Pretreatment Fee Schedule

1. Administrative Fee: \$175/sampling of permittee wastewater discharge.
2. Sampling Charge: \$250/sampling day for 24-hour composite sample and/or \$30 for grab sample.
3. Laboratory Analysis Charge: charges incurred by outside or at plant testing laboratory.
4. Any additional fees: Fee for reviewing accidental discharge procedures And pretreatment construction will be \$300.
5. The above fee schedule may be changed only with prior written notification by the City of Watertown.

B. Right of Entry

The permittee shall, after reasonable notification by the City of Watertown WWTP, allow the City of Watertown WWTP or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the permittee at all reasonable hours for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling include any time the permittee is operating any process which results in a process of wastewater discharge to the City of Watertown WWTP usually between 7:00 am and 3:00 pm.

C. Record Retention

The permittee shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence, and any and all summaries thereof, relating to monitoring, sampling, and chemical analyses made by or on behalf of a user in connection with its discharge. All records, which pertain to matters which are the subject to any enforcement or litigation activities brought by the City pursuant hereto, shall be retained and preserved by the user until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

D. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid; the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

E. Confidential Information

Except for data determined to be confidential under Chapter 508-9 (M) of the Municipal Code of Watertown, all reports required by this permit shall be available for public inspection at the Watertown WWTP.

F. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

1. The exact place, date, and time of sampling;
2. The dates of the analysis were performed;
3. The person(s) who perform the analyses;
4. The analytical techniques or methods used; and
5. The results of all required analysis.

G. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of The State Wisconsin as well as being subjected to civil penalties and relief.

H. Modifications or Revision of Permit

1. The terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified in Chapter 508-9 J(5) of the City Municipal Code are modified or other just cause exists.
2. This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.
3. Any modification which results in new conditions in the permit shall include a reasonable time schedule for compliance, if necessary.
4. The Permittee reserves the right to request review or termination of this permit or its subsections in the event of a change in operating parameters or other unforeseen circumstances which make this permit or subsections no longer adequate or relevant. Such request shall be submitted in writing to The City of Watertown WWTP.

I. Dilution

No permittee shall ever increase the use of process water or, in any way; attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the categorical pretreatment standards, or in any other pollutant-specified limitation developed by the City of Watertown or State of Wisconsin. (Comment: blending may be an acceptable means of complying with some of the prohibitions set forth in subsection 508-8 (C) of the City of Watertown Code e.g. pH prohibition). The Wastewater Facilities may impose mass limitations on industrial users which are suspected of using dilution to meet applicable pretreatment standards or requirements or in other cases where the imposition of mass limitations is appropriate.

J. Notification of Changed Discharge

All industrial users shall promptly notify the Wastewater Facilities in advance of any change in its industrial operations which may have an effect upon the waste and wastewaters generated or any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the industrial user has submitted initial notification pursuant to Chapter 508-9 (J) of the Municipal Code of Watertown. In such event, the Wastewater Facilities may add to, change, or modify the conditions of the permit in accordance with Chapter 508-9 J of the Municipal Code of Watertown.

K. Proper Disposal of Pretreatment Sludge

The disposal of sludge generated within wastewater pretreatment systems shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

L. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or Chapter

508 of the Municipal Code of Watertown, shall inform the City immediately of the first awareness of the commencement of the upsets in accordance with requirements in Chapter 508-9 I of the Municipal Code of Watertown.

M. Slug Discharge Control Plan

The Wastewater Facilities will evaluate at least once every two years whether each significant industrial user needs a plan to control slug discharges. If the Wastewater Facilities determines that a slug control plan is needed, the plan shall be developed in accordance with the requirements contained in Chapter 508-9 I(4) of the Municipal Code of Watertown.

N. Publication of Noncompliance

A list of industrial users which, at any time during the previous twelve months, were in significant noncompliance with applicable pretreatment requirements shall be annually published in the local newspaper. The notification shall also summarize any enforcement actions taken against the user during the same 12-month period. Details on the criteria for a significant violator are covered in Chapter 508-9 K(2) of the Municipal Code of Watertown. For Industries not part of Federal Pretreatment requirements and only issued permit to enforce the Municipal Code of Watertown Chapter 508 as it relates to Industrial cost recovery will not be published in paper for those violations. Unless violation is egregious that notification is required. This will be decided by Watertown WWTP personnel.

O. Civil and Criminal Penalties

Any user of Wastewater Treatment Plant and collection system who is found to have violated an order of the Public Works Committee or who willfully or negligently failed to comply with any provisions of Chapter 508 of Municipal Code of Watertown, and orders, rules, regulations, and permits issued hereunder, shall be subject to fines as established in Chapter 508-10 (E) of the Municipal Code of Watertown.

P. Permit Transfer

Wastewater discharge permits are issued to a specified industrial user for a specified operation. A wastewater discharge permit shall not be reassigned, transferred, or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall comply also with the terms and conditions of the existing permit.

Q. Signatory Requirements

All reports required for this permit shall be signed by the principal executive officer of the permittee, or his/her designee.

R. Reporting Address: All reports required by this permit shall be submitted to;

Watertown Water Systems Manager
P.O. Box 477
Watertown, WI 53094