

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

May 6, 2026

Re: May 12, 2026, Public Works Commission agenda item

Water Systems:

Review and approve 2025 Compliance Maintenance Annual Report (CMAR) – Wastewater Utility permit to discharge summary.

Background: A requirement for the wastewater utility under the Wisconsin Pollutant Discharge Elimination System permit issued by the Wisconsin Department of Natural Resources (WDNR) is to complete the Compliance Maintenance Annual Report (CMAR), referenced in Wisconsin Administrative Code NR 208.

The CMAR report shows a failing grade for influent TSS based on how the State evaluates design capacity. What that means is that, on paper, the amount of solids coming into the plant exceeds the design values. However, it's important to note that we recently completed and received approval for a comprehensive facility plan, which the DNR required and which evaluated exactly this issue. That plan used updated population projections and current data, and it concluded that the plant is not capacity-limited—it's more of an age and infrastructure condition issue. In other words, while the report flags this as a concern under their rating system, the plant is continuing to treat wastewater effectively, and we already have an approved plan in place to address long-term needs.

The DNR confirmed that, under their current process, CMAR design capacities generally remain tied to the currently approved rated capacities until either:

1. completion of an approved construction project that changes or contributes to a change in plant capacity, or
2. approval of a formal capacity re-rating request.

The complication in our case is that the recently approved facility plan primarily focuses on rehabilitation, replacement, and reliability improvements to existing infrastructure—not expansion of treatment capacity. In other words, the projects improve long-term reliability and maintainability of the plant, but they do not significantly change the plant's hydraulic or biological treatment capacity on paper.

As a result, the CMAR may continue to show a design exceedance condition even though the plant continues to operate effectively and consistently meets permit effluent limits.

Through discussions with the DNR, they also clarified that a formal capacity re-rating process may be an appropriate future option if the City wishes to evaluate whether the plant's currently rated capacities accurately reflect operational performance.

In the meantime, the DNR indicated that no additional enforcement action is anticipated as long as the city continues implementing the approved facility plan.”

Budget Goal: This report shows that continued investments and infrastructure planning is being accomplished and is ongoing encouraging community growth that involves environmental needs following codes and policy.

Fiscal Impact: Unknown at this time, a formal request was made to our consulting engineer for a formal plant capacity re-rating.

Recommendation: I recommend forwarding a resolution to the Watertown City Council which includes a specific mention of the action the wastewater utility is required to conduct.

Statement in resolution:

WHEREAS, the Public Works Commission has recommended the following action regarding the influent BOD design exceedance for loading. To work with DNR and our consultants to understand if capacity re-rating is warranted to accurately reflect performance operations, and to continue supporting the wastewater utility staff with equipment and infrastructure improvements when and where necessary, pending available funding.

Sincerely,

Peter Hartz
Water Systems Manger