Permit Fact Sheet

General Information

Permit Number	WI-0023990-10-0
Permittee Name and Address	City of Fond du Lac P O Box 150, Fond du Lac, WI 54936
Permitted Facility Name and Address	Fond du Lac WTRRF 700 Doty Street, Fond du Lac, Wisconsin
Permit Term	January 01, 2027 to December 31, 2031
Discharge Location	Lake Winnebago near the mouth of the Fond du Lac River
Receiving Water	Lake Winnebago in Fond du Lac River Watershed of Upper Fox River Basin in Fond Du Lac County
Stream Flow ($Q_{7,10}$)	A 10:1 dilution ratio is used due to the receiving water not exhibiting a unidirectional flow at the point of discharge.
Stream Classification	Warm Water Sport Fish (WWSF) Community; non-public water supply
Discharge Type	Existing, Continuous
Annual Average Design Flow (MGD)	9.84 MGD
Industrial or Commercial Contributors	The Fond du Lac WWTP has 7 categorical, 3 significant (SIU) industrial users, 1 (IU)
Plant Classification	A1 - Suspended Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; P - Total Phosphorus; D - Disinfection; L - Laboratory; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	Yes

Facility Description

The permittee owns and operates the Fond du Lac Wastewater Treatment & Resource Recovery Facility (WTRRF), a wastewater treatment facility which treats sewage from the City of Fond du Lac; Calumet Sanitary District No. 1; Taycheedah Sanitary Districts No.'s 1 & 3; Town of Fond du Lac Sanitary Districts No.'s 2, 3, 4 & 6; Town of Empire Sanitary Districts No.'s 1, 2 & 3; Town of Friendship Sanitary District No.1 and Flood District; and the Village of North Fond du Lac. The facility receives domestic, commercial, and industrial wastes and the permittee administers an industrial pretreatment program that regulates the industrial contributors. Biological treatment is provided using an activated sludge system. Phosphorous removal is provided through biological treatment in the aeration basins and ferric sulfate additions. Disinfection is provided seasonally from May through September using ultraviolet radiation to protect recreational uses of the receiving water. Sludge is stabilized by mesophilic anaerobic digestion and then dewatered by centrifuges. Sludge is land applied and provisions are also in place for it to be landfilled.

The permittee has requested blending approval to continue as part of their permit application. Based on an evaluation of their request and associated documentation, blending is conditionally approved per s. NR 210.12(2), Wis. Adm. Code.

Substantial Compliance Determination

After a desktop review of all discharge monitoring reports, CMARs, land application reports, compliance schedule items, and a site visit on April 1st, 2026, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Mark Stanek, Wastewater Engineer on July 24th, 2026.

Sample Point Descriptions

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**
703	7.0 MGD (2025)	INFLUENT: Representative 24-hour flow proportional samples shall be collected from the influent channel upstream of the screening. Flow is measured with two Parshall flumes at the influent pumping discharge prior to the screen.
102	N/A	FIELD BLANK: Sample point for reporting results of Mercury field blanks collected using standard sample handling procedures.
199	2.54 MGD average during blending occurrences in previous permit term	BLENDING: Sample point is at the blending gate just upstream of the UV disinfection system. This sample point is for reporting flow that is diverted away from biological treatment, flows out of the excess flow clarifiers, and is eventually blended with the secondary effluent prior to disinfection and discharge through Outfall 003. Flow measurement shall be calculated as the totalized flow at the time that the blending gate is closed minus the totalized flow when the blending gate is open, minus the volume of wastewater that went through the aeration basins as forward flow. The permittee shall notify the Department when blending occurs. See "Blending" requirements in the Standard Requirements section of the permit.
003	7.0 MGD (2025)	EFFLUENT: Representative 24-hour composite samples shall be collected prior to discharge from the effluent channel upstream of UV disinfection. Effluent grab samples shall be taken from the effluent trough area downstream of UV disinfection. Flow is measured at the two Parshall flumes at the influent pumping discharge prior to the screen (influent flow used for effluent flow).
004	228 metric tons (2024)	LAND APPLICATION: (Centrifuge Discharge) Sludge is treated by anaerobic digestion then dewatered using centrifuges and land applied or disposed at a landfill. This cake sludge meets Class B pathogen reduction criteria. Cake sludge is sampled immediately after the centrifuges and/or from the cake sludge hopper.
006	N/A – no land application	LAND APPLICATION: (Digester Effluent) Digested liquid sludge shall be sampled immediately after leaving the digester. This outfall meets Class B requirements and should not be land applied. Sludge shall only be disposed of via a WPDES permitted contractor.

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**
007	N/A – new outfall	LAND APPLICATION: (Dryer Discharge) Representative samples shall be taken from the discharge conveyor of the sludge dryer. Compliance with Class A fecal coliform or salmonella requirements shall be demonstrated immediately after the treatment process and again prior to land application if that is more than three weeks later. See also Standard Requirements section for "Class A Fecal Coliform".
008	N/A – new outfall	LAND APPLICATION: (Solids from Storage Silo) Representative samples of the cake sludge shall be collected from the discharge of the storage silo. Compliance with Class A fecal coliform or salmonella requirements shall be demonstrated immediately after the treatment process and again prior to land application if that is more than three weeks later. See also Standard Requirements section for "Class A Fecal Coliform". Cake sludge is produced through the following process: liquid sludge is treated with anaerobic digestion and transferred to a centrifuge for dewatering. Following the centrifuge, sludge is sent to a dryer before being stored in the storage silo prior to being hauled offsite for land application.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 703- INFLUENT

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Continuous	
BOD5, Total		mg/L	Daily	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	Daily	24-Hr Flow Prop Comp	
Cadmium, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Chromium, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Copper, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Lead, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Nickel, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Zinc, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Mercury, Total Recoverable		ng/L	Quarterly	24-Hr Flow Prop Comp	

1.1.1 Changes from Previous Permit:

Influent limitations and monitoring requirements were evaluated for this permit term and no changes were required in this permit section.

1.1.2 Explanation of Limits and Monitoring Requirements

Monitoring of influent flow, BOD5 and total suspended solids is required by s. NR 210.04(2), Wis. Adm. Code, to assess wastewater strengths and volumes and to demonstrate the percent removal requirements in s. NR 210.05, Wis. Adm. Code, and in the Standard Requirements section of the permit.

2 Inplant - Monitoring and Limitations

2.1 Sample Point Number: 102- FIELD BLANK

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Mercury, Total Recoverable		ng/L	Quarterly	Blank	

2.1.1 Changes from Previous Permit:

In-plant limitations and monitoring requirements were evaluated for this permit term and no changes were required in this permit section.

2.1.2 Explanation of Limits and Monitoring Requirements

Mercury Field Blank- Monitoring is included in the permit pursuant to s. NR 106.145, Wis. Adm. Code. Field blanks must meet the requirements under s. NR 106.145(9) and (10), Wis. Adm. Code. The permittee shall collect a mercury field blank for each set of mercury samples (a set of samples may include a combination of influent, effluent or other samples all collected on the same day). Field blanks are required to verify a sample has not been contaminated during collection, transportation or analysis.

2.2 Sample Point Number: 199- IN PLANT BLENDING

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Per Occurrence	Calculated	See "Blending Flow" permit section.
Time		hours	Per Occurrence	Calculated	Report the total duration of blending within a given day (12:00am-11:59pm) in which blending occurs. See "Blending Flow" permit section.

2.2.1 Changes from Previous Permit:

In-plant limitations and monitoring requirements were evaluated for this permit term and no changes were required in this permit section.

2.2.2 Explanation of Limits and Monitoring Requirements

Blending Monitoring: Section NR 205.07(1)(u), Wis. Adm. Code, requires that the department approve all blending and comply with requirements of s. NR 210.12, Wis. Adm. Code. The facility submitted a request for blending approval with supporting documentation on October 4, 2022 with permit reissuance application. The department determined the submitted documentation demonstrates that the facility complies with the general provisions to justify blending under s. NR 210.12(1) and (2), Wis. Adm. Code, and has the physical capability and necessary equipment in place to practice blending. The department approved the blending request on October 4, 2022.

The department included this sampling point to constitute permitting and approval of the blending provided the blending monitoring requirements and conditions are followed. The reporting and monitoring requirements are based on s. NR 210.12(6), Wis. Adm. Code. Any blending shall be reported to the department by telephone, fax or email no later than 24 hours from the time each blending operation ceases at the sewage treatment facility. Permittees shall also report the time, duration, and volume of wastewater routed around the biological treatment process or routed through an alternative treatment process on the wastewater discharge monitoring report forms required by the permit. A bypass that is defined as a controlled diversion in s. NR 205.07(1)(v), Wis. Adm. Code, is not covered under this sample point.

3 Surface Water - Monitoring and Limitations

3.1 Sample Point Number: 003- EFFLUENT

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		MGD	Daily	Total Daily	The permittee may report the Influent flow rate as the Effluent flow rate.
BOD5, Total	Weekly Avg	45 mg/L	Daily	24-Hr Flow	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
				Prop Comp	
BOD5, Total	Monthly Avg	30 mg/L	Daily	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	45 mg/L	Daily	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	30 mg/L	Daily	24-Hr Flow Prop Comp	
Suspended Solids, Total		lbs/day	Daily	Calculated	
Suspended Solids, Total		lbs/month	Monthly	Calculated	Calculate the Total Monthly Discharge of TSS and report on the last day of the month on the DMR. See TMDL Calculations section.
Suspended Solids, Total		lbs/yr	Monthly	Calculated	Calculate the 12-month rolling sum of total monthly mass of TSS discharged and report on the last day of the month on the DMR. See TMDL Calculations section.
pH Field	Daily Max	9.0 su	Daily	Grab	
pH Field	Daily Min	6.0 su	Daily	Grab	
Temperature Maximum		deg F	Daily	Continuous	
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Effective May - September.
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Effective May – September. See the E. coli Percent Limit section in the permit. Enter the result in the DMR on the last day of the month.
Phosphorus, Total	Monthly Avg	0.8 mg/L	Daily	24-Hr Flow Prop Comp	Limit effective throughout the permit term, as it represents a minimum control level.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Phosphorus, Total		lbs/day	Daily	Calculated	Report daily mass discharged using Equation 1a. in the Water Quality Trading (WQT) section.
Phosphorus, Total		lbs/month	Monthly	Calculated	Calculate the Total Monthly Discharge of phosphorus and report on the last day of the month on the DMR. See TMDL Calculations section.
Phosphorus, Total	Monthly Avg	53 lbs/day	Monthly	Calculated	Limit effective upon permit reissuance.
Phosphorus, Total		lbs/yr	Monthly	Calculated	Calculate the 12-month rolling sum of total monthly mass of phosphorus discharged and report on the last day of the month on the DMR. See TMDL Calculations section.
WQT Computed Compliance (TP)	6-Month Avg	18 lbs/day	1/6 Months	Calculated	Report the WQT TP Computed Compliance value using Equation 3a. in the Water Quality Trading (WQT) section. Compliance with the six-month average limit is evaluated at the end of the six-month period on June 30 and Dec 31.
WQT Credits Used (TP)		lbs/month	1/6 Months	Calculated	Report WQT TP Credits used semiannually using Equation 2b. in the Water Quality Trading (WQT) section. Available TP Credits are specified in Table 2 and in the approved Water Quality Trading Plan.
WQT Credits Used (TP)	Annual Total	261.9 lbs/yr	Annual	Calculated	The sum of total monthly credits used may not exceed Table 2 values listed in the permit.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nitrogen, Ammonia Variable Limit		mg/L	Daily	See Table	Look up variable ammonia limit from the "Variable Ammonia Limitation" table and report the variable limit in the Ammonia Variable Limit column on the eDMR.
Nitrogen, Ammonia (NH3-N) Total	Daily Max - Variable	mg/L	Daily	24-Hr Flow Prop Comp	
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	34 mg/L	Daily	24-Hr Flow Prop Comp	Applies December - May.
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	17 mg/L	Daily	24-Hr Flow Prop Comp	Applies June - September.
Nitrogen, Ammonia (NH3-N) Total	Weekly Avg	33 mg/L	Daily	24-Hr Flow Prop Comp	Applies October - November.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	22 mg/L	Daily	24-Hr Flow Prop Comp	Applies January - March.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	19 mg/L	Daily	24-Hr Flow Prop Comp	Applies April - May.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	6.1 mg/L	Daily	24-Hr Flow Prop Comp	Applies June - September.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	13 mg/L	Daily	24-Hr Flow Prop Comp	Applies October - November.
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	34 mg/L	Daily	24-Hr Flow Prop Comp	Applies December.
Cadmium, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Chromium, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Copper, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Lead, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Nickel, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Zinc, Total Recoverable		ug/L	Monthly	24-Hr Flow Prop Comp	
Mercury, Total		ng/L	Quarterly	Grab	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Recoverable					
Chloride		mg/L	Monthly	24-Hr Flow Prop Comp	Monthly in 2028.
Nitrogen, Total Kjeldahl		mg/L	Quarterly	24-Hr Flow Prop Comp	
Nitrogen, Nitrite + Nitrate Total		mg/L	Quarterly	24-Hr Flow Prop Comp	
Nitrogen, Total		mg/L	Quarterly	Calculated	Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.
PFOS		ng/L	Monthly	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need schedule.
PFOA		ng/L	Monthly	Grab	Monitoring only. See PFOS/PFOA Minimization Plan Determination of Need schedule.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See the Whole Effluent Toxicity (WET) Testing section.
Chronic WET		TUc	See Listed Qtr(s)	24-Hr Flow Prop Comp	See the Whole Effluent Toxicity (WET) Testing section.

3.1.1 Changes from Previous Permit

Effluent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under "Explanation of Limits and Monitoring Requirements" below.

- **Total Suspended Solids-** TMDL mass limits added.
- **E. coli-** Fecal coliform monitoring and limits have been replaced with Escherichia coli (E. coli) monitoring and limits.
- **Total Phosphorus –** TMDL mass limits added.
- **Chloride –** Monthly monitoring in 2028 was added to the permit.
- **Total Nitrogen Monitoring (TKN, N02+N03 and Total N)**- Quarterly monitoring is required in specific quarters as outlined in the permit.

- **PFOS and PFOA** – Monthly monitoring is included in the permit in accordance with s. NR 106.98(2)(a), Wis. Adm. Code.

3.1.2 Explanation of Limits and Monitoring Requirements

Detailed discussions of limits and monitoring requirements can be found in the attached water quality-based effluent limits (WQBEL) memo dated March 4, 2025.

Monitoring Frequencies- The Monitoring Frequencies for Individual Wastewater Permits guidance (April 12, 2021) recommends that standard monitoring frequencies be included in individual wastewater permits based on the size and type of the facility, in order to characterize effluent quality and variability, to detect events of noncompliance, and to ensure consistency in permits issued across the state. Guidance and requirements in administrative code were considered when determining the appropriate monitoring frequencies for pollutants that have final effluent limits in effect during this permit term.

Expression of Limits- In accordance with the federal regulation 40 CFR 122.45(d) and s. NR 205.065, Wis. Adm. Code, limits in this permit are to be expressed as weekly and monthly average limits whenever practicable.

Total Suspended Solids TMDL Limits- Mass based TSS limits of 4,558 lbs/day as a weekly average and 3,558 lbs/day as a monthly average have been added to the permit to comply with requirements of the Upper Fox Wolf River TMDL. Effluent concentration (mg/L) shall be monitored and reported 7 times per week upon permit reissuance and will be used to calculate amounts reported for mass-based limits. An additional reporting requirement for lbs/month will be used to calculate the facility's 12-month rolling sum of total monthly discharge, which can be compared directly to the facility's designated WLA.

Phosphorus TMDL Limits- Mass based phosphorus limits of 18 lbs/day as a six-month average and 53 lbs/day as a monthly average have been added to the permit to comply with requirements of the Upper Fox Wolf River TMDL. Effluent concentration (mg/L) shall be monitored and reported 7 times per week upon permit reissuance and will be used to calculate amounts reported for mass-based limits. An additional reporting requirement for lbs/month will be used to calculate the facility's 12-month rolling sum of total monthly discharge, which can be compared directly to the facility's designated WLA.

Phosphorus – Phosphorus requirements are based on the Phosphorus Rules that became effective December 1, 2010 as detailed in NR 102 Water Quality Standards and NR 217 Effluent Standards and Limitations for Phosphorus. Chapter NR 217 of the Wis. Adm. Code addresses point source dischargers of phosphorus to surface waters. Currently in NR 217 Wis. Adm. Code there are two methods used to determine if a phosphorus limit is needed: a technology based effluent limit (TBEL) and a water quality based effluent limit (WQBEL). Based on the classification of the lake, the water quality criteria for Lake Winnebago is 40 ug/L. In this case, the WQBEL is 53 lbs/day (monthly average), and 18 lbs/day (6-month average). For the reasons explained in the April 30, 2012 paper entitled 'Justification for Use of Monthly, Growing Season and Annual Average Periods for Expression of WPDES Permit Limits for Phosphorus Discharges in Wisconsin', WDNR has determined that it is impracticable to express the phosphorus WQBEL for the permittee as a maximum daily, weekly or monthly value. The final effluent limit for phosphorus is expressed as a six-month average. It is also expressed as a monthly average equal to three times the derived WQBEL (which equates to 53 lbs/day). These final effluent limits were derived from and comply with the applicable water quality criterion. A phosphorus concentration limit is necessary to prevent backsliding during the term of the permit. The monthly average limit of 0.8 mg/L will be retained in the permit.

The wastewater treatment facility is not able to meet the WQBEL. This permit authorizes the use of trading as a tool to demonstrate compliance with the phosphorus WQBELs. This permit includes terms and conditions related to the Water Quality Trading Plan (WQT-2026-0011) or approved amendments thereof. The total 'WQT TP Credits' available are designated in the approved WQT Plan. The City has implemented a variety of management practices including conversion of cropland into grass/hay for conservation cover, construction of grassed waterways, and construction of rock-lined waterways. The WQT Plan proposes the generation of 261.9 lbs/yr of phosphorus credits for the next five years.

Additional WQT subsections in the permit provide information on compliance determinations, annual reporting and re-opening of the permit.

Total Nitrogen Monitoring (NO2+NO3, TKN and Total N): The Department has included effluent monitoring for Total Nitrogen in the permit through the authority under §§ 283.55(1)(e), Wis. Stats., which allows the department to require the permittee to submit information necessary to identify the type and quantity of any pollutants discharged from the point source, and through s. NR 200.065(1)(h), Wis. Adm. Code, which allows for this monitoring to be collected during the permit term. More information on the justification to include total nitrogen monitoring in wastewater permits can be found in the "Guidance for Total Nitrogen Monitoring in Wastewater Permits" dated October 1, 2019.

Chloride – Monitoring is required to ensure that sufficient sample results are available at the next permit issuance to meet the data requirements of s. NR 106.85, Wis. Adm. Code.

PFOS and PFOA – NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. At the first reissuance of a WPDES permit after August 1, 2022, the new rule requires WPDES permits for major municipal dischargers, with an average flow rate greater than or equal to 5 MGD, at a minimum sample effluent on a monthly basis for PFOS and PFOA pursuant s. NR 106.98(2)(a), Wis. Adm. Code. The initial determination of the need for sampling shall be conducted for up to two years in order to determine if the permitted discharge has the reasonable potential to cause or contribute to an exceedance of the PFOS or PFOA standards under s. NR 102.04(8)(d)1, Wis. Adm. Code.

4 Land Application - Monitoring and Limitations

Municipal Sludge Description						
Sample Point	**Sludge Class (A or B)**	**Sludge Type (Liquid or Cake)**	**Pathogen Reduction Method**	**Vector Attraction Method**	**Reuse Option**	**Amount Reused/Disposed (Dry Tons/Year)**
004	B	Cake	Fecal coliform	Volatile Solids Reduction/Incorporation	Land Application or Landfill	228 metric tons
006	B	Liquid				N/A
007	A	Cake				N/A - new
008	A	Cake	Fecal coliform	Volatile Solids Reduction/Incorporation	Land Application or Landfill	N/A - new
Does sludge management demonstrate compliance? **Yes.**						
Is additional sludge storage required? **No.**						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? **Yes.** If yes, special monitoring and recycling conditions will be included in the permit to track any potential problems in landapplying sludge from this facility						
Is a priority pollutant scan required? **Yes.** Priority pollutant scans are required once every 10 years at facilities with design flows between 5 MGD and 40 MGD, and once every 5 years if design flow is greater than 40 MGD.						

4.1 Sample Point Number: 004- CENTRIFUGE DISCHARGE

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	1/ 2 Months	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	1/ 2 Months	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	1/ 2 Months	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	1/ 2 Months	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	1/ 2 Months	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	1/ 2 Months	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	1/ 2 Months	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	1/ 2 Months	Composite	
Lead Dry Wt	High Quality	300 mg/kg	1/ 2 Months	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	1/ 2 Months	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	1/ 2 Months	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	1/ 2 Months	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	1/ 2 Months	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	1/ 2 Months	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	1/ 2 Months	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	1/ 2 Months	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	1/ 2 Months	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	1/ 2 Months	Composite	
Nitrogen, Total Kjeldahl		Percent	1/ 2 Months	Composite	
Nitrogen, Ammonium (NH4-N) Total		Percent	1/ 2 Months	Composite	
Phosphorus, Total		Percent	1/ 2 Months	Composite	
Phosphorus, Water Extractable		% of Tot P	1/ 2 Months	Composite	
Potassium, Total Recoverable		Percent	1/ 2 Months	Composite	
Radium 226 Dry Wt		pCi/g	Annual	Composite	Sampling only required if outfall is land applied.
PFOA + PFOS		ug/kg	Annual	Calculated	Sampling only required if outfall is land applied.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
PFAS Dry Wt			Annual	Grab	Sampling only required if outfall is land applied. Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

4.1.1 Changes from Previous Permit:

Sludge limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit. See additional explanation of limits under "Explanation of Limits and Monitoring Requirements" below.

PFAS –Monitoring is required when outfall is land applied pursuant to s. NR 204.06(2)(b)9., Wis. Adm. Code.

PCB – Testing not required this permit term.

Priority Pollutant Scan – Testing not required this permit term.

4.1.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6), Wis. Adm. Code and in s. NR 204.07 (7), Wis. Adm. Code for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k), Wis. Adm. Code. Radium requirements are addressed in s. NR 204.07(3)(n), Wis. Adm. Code.

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA has developed a draft risk assessment to determine future land application rates and released this risk assessment in January of 2025. The department is evaluating this new information. Until a decision is made, the "Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS" should be followed

Collecting sludge data on PFAS concentrations from a wide range of wastewater treatment facilities will help protect public health from exposure to elevated levels of PFAS and determine the department's implementation of EPA's recommendations. To quantitate this risk, PFAS sampling has been included in this WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

4.2 Sample Point Number: 006- DIGESTER EFFLUENT

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Arsenic Dry Wt	Ceiling	75 mg/kg	1/ 2 Months	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	1/ 2 Months	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	1/ 2 Months	Composite	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Cadmium Dry Wt	High Quality	39 mg/kg	1/ 2 Months	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	1/ 2 Months	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	1/ 2 Months	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	1/ 2 Months	Composite	
Lead Dry Wt	High Quality	300 mg/kg	1/ 2 Months	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	1/ 2 Months	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	1/ 2 Months	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	1/ 2 Months	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	1/ 2 Months	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	1/ 2 Months	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	1/ 2 Months	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	1/ 2 Months	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	1/ 2 Months	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	1/ 2 Months	Composite	
Radium 226 Dry Wt		pCi/g	Annual	Composite	Sampling only required if outfall is land applied.
PFOA + PFOS		ug/kg	Annual	Calculated	Sampling only required if outfall is land applied.
PFAS Dry Wt			Annual	Grab	Sampling only required if outfall is land applied. Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

4.2.1 Changes from Previous Permit:

N/A – New outfall.

4.2.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5), Wis. Adm. Code. Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7), Wis. Adm. Code for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k), Wis. Adm. Code. Radium requirements are addressed in s. NR 204.07(3)(n), Wis. Adm. Code.

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA has developed a draft risk assessment to determine future land application rates and released this risk assessment in January of 2025. The department is evaluating this new information. Until a decision is made, the "Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS" should be followed

Collecting sludge data on PFAS concentrations from a wide range of wastewater treatment facilities will help protect public health from exposure to elevated levels of PFAS and determine the department's implementation of EPA's recommendations. To quantitate this risk, PFAS sampling has been included in this WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

4.3 Sample Point Number: 007- DRYER DISCHARGE

4.3.1 Changes from Previous Permit:

N/A – This is a new outfall. Monitoring at this Sample Point is for pathogen retesting.

4.3.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5), Wis. Adm. Code. Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07(7), Wis. Adm. Code for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k), Wis. Adm. Code. Radium requirements are addressed in s. NR 204.07(3)(n), Wis. Adm. Code.

4.4 Sample Point Number: 008- STORAGE SILO DISCHARGE

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	1/ 2 Months	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	1/ 2 Months	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	1/ 2 Months	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	1/ 2 Months	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	1/ 2 Months	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	1/ 2 Months	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	1/ 2 Months	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	1/ 2 Months	Composite	
Lead Dry Wt	High Quality	300 mg/kg	1/ 2 Months	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	1/ 2 Months	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	1/ 2 Months	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	1/ 2 Months	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	1/ 2 Months	Composite	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nickel Dry Wt	High Quality	420 mg/kg	1/ 2 Months	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	1/ 2 Months	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	1/ 2 Months	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	1/ 2 Months	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	1/ 2 Months	Composite	
Nitrogen, Total Kjeldahl		Percent	1/ 2 Months	Composite	
Nitrogen, Ammonium (NH_4-N) Total		Percent	1/ 2 Months	Composite	
Phosphorus, Total		Percent	1/ 2 Months	Composite	
Phosphorus, Water Extractable		% of Tot P	1/ 2 Months	Composite	
Potassium, Total Recoverable		Percent	1/ 2 Months	Composite	
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Sample in 2029.
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Sample in 2029.
Radium 226 Dry Wt		pCi/g	Annual	Composite	
PFOA + PFOS		µg/kg	Annual	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.
Municipal Sludge Priority Pollutant Scan			Once	Composite	Sample in 2029. As specified in ch. NR 215.03 (1-4), Wis. Adm. Code

4.4.1 Changes from Previous Permit:

N/A – This is a new outfall.

4.4.2 Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5), Wis. Adm. Code.

Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07(7), Wis. Adm. Code for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k), Wis. Adm. Code. Radium requirements are addressed in s. NR 204.07(3)(n), Wis. Adm. Code.

5 Schedules

5.1 Phosphorus Payment per Pound to County

The permittee is required to make annual payments for phosphorus reductions to the participating county or counties in accordance with s. 283.16(8), Wis. Stats, and the following schedule. The price per pound will be set at the time of permit reissuance and will apply for the duration of the permit.

Required Action	Due Date
Annual Verification of Phosphorus Payment to County: The permittee shall make a total payment to the participating county or counties approved by the Department by March 1 of each calendar year. The amount due is equal to the following: (lbs of phosphorus discharged minus the permittee's target value) times $68.40 or $640,000, whichever is less. See the payment calculation steps in the Surface Water section. The permittee shall submit Form 3200-151 to the Department by March 1 of each calendar year indicating total amount remitted to the participating counties to verify that the correct payment was made. The first payment verification form is due by the specified Due Date. Note: The applicable Target Value is 0.2 mg/L as defined by s. 283.16(1)(h), Wis. Stats. The "per pound" value is $50.00 adjusted for CPI.	03/01/2027

5.1.1 Explanation of Schedule

Subsection 283.16(6)(b), Wis. Stats., requires permittees that have received approval for the multi-discharger variance (MDV) to implement a watershed project that is designed to reduce non-point sources of phosphorus within the HUC 8 watershed in which the permittee is located. The permittee has selected the "Payment to Counties" watershed option described in s. 283.16(8), Wis. Stats. Under this option the permittee shall make annual payment(s) to participating county(s) that are calculated based on the amount of phosphorus actually discharged during a calendar year in pounds per year less the amount of phosphorus that would have been discharged had the permittee discharged phosphorus at the TMDL derived limits. The pounds of phosphorus discharged in excess of the target value is multiplied by a per pound phosphorus charge that will equal $68.40 per pound. This schedule requires the permittee to submit Form 3200-151 to the Department indicating the total amount remitted to the participating county(s).

5.2 Water Quality Trading (WQT) Annual Report

Required Action	Due Date
Annual WQT Report #1: Submit an annual WQT report that shall cover the first year of the permit term. The WQT Report shall include: The number of pollutant reduction credits (lbs/month) used each month of the previous year to demonstrate compliance; The source of each month's pollutant reduction credits by identifying the approved water quality	01/31/2027

trading plan that details the source; A summary of the annual inspection of each nonpoint source management practice that generated any of the pollutant reduction credits used during the previous year; and Identification of noncompliance or failure to implement any terms or conditions of this permit with respect to water quality trading that have not been reported in discharge monitoring reports.	
Annual WQT Report #2: Submit an annual WQT report that shall cover the previous year.	01/31/2028
Annual WQT Report #3: Submit an annual WQT report that shall cover the previous year.	01/31/2029
Annual WQT Report #4: Submit an annual WQT report that shall cover the previous year.	01/31/2030
Annual WQT Report #5: Submit the 5th annual WQT report. If the permittee wishes to continue to comply with phosphorus limits through WQT in subsequent permit terms, the permittee shall submit a revised WQT plan including a demonstration of credit need, compliance record of the existing WQT, and any additional practices needed to maintain compliance over time.	01/31/2031
Annual WQT Report Required After Permit Expiration: In the event that this permit is not reissued by the expiration date, the permittee shall continue to submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.	

5.2.1 Explanation of Schedule

Reports are required, starting in 2028, that include the following information:

- Verification that site inspections occurred;
- Brief summary of site inspection findings;
- Identification of noncompliance or failure to implement any terms or conditions of the permit or trading plan that have not been reported in discharge monitoring reports;
- Any applicable notices of termination or management practice registration; and
- A summary of credits used each month over the calendar year

5.3 PFOS/PFOA Minimization Plan Determination of Need

Required Action	Due Date
Report on Effluent Discharge: Submit a report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations. This analysis should also include a comparison to the applicable narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results.	01/01/2028
Report on Effluent Discharge and Evaluation of Need: Submit a final report on effluent PFOS and PFOA concentrations and include an analysis of trends in monthly and annual average PFOS and PFOA concentrations of data collected over the last 24 months. The report shall also provide a	01/01/2029

comparison on the likelihood of the facility needing to develop a PFOS/PFOA minimization plan. This report shall include all additional PFOS and PFOA data that may be collected including any influent, intake, in-plant, collection system sampling, and blank sample results. The permittee shall also submit a request to the department to evaluate the need for a PFOS/PFOA minimization plan. If the Department determines a PFOS/PFOA minimization plan is needed based on a reasonable potential evaluation, the permittee will be required to develop a minimization plan for Department approval no later than 90 days after written notification was sent from the Department. The Department will modify or revoke and reissue the permit to include PFOS/PFOA minimization plan reporting requirements along with a schedule of compliance to meet WQBELs. Effluent monitoring of PFOS and PFOA shall continue as specified in the permit until the modified permit is issued. If, however, the Department determines there is no reasonable potential for the facility to discharge PFOS or PFOA above the narrative standard in s. NR 102.04(8)(d), Wis. Adm. Code, no further action is required and effluent monitoring of PFOS and PFOA shall continue as specified in the permit.	

5.3.1 Explanation of Schedule

As stated above, ch. NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Section NR 106.98, Wis. Adm. Code, specifies steps to generate data in order to determine the need for reducing PFOS and PFOA in the discharge. Data generated per the effluent monitoring requirements will be used to determine the need for developing a PFOS/PFOA minimization plan. As part of the schedule, the permittee is required to submit two annual Reports on Effluent Discharge.

If the Department determines that a minimization plan is needed, the permit will be modified or revoked/reissued to include additional requirements.

5.4 Mercury Pollutant Minimization Program

The permittee shall continue to operate its Mercury PMP, previously approved by the Department.

Required Action	Due Date
Annual Mercury Progress Reports: Submit an annual mercury progress report related to the pollutant minimization activities for the previous year. The annual mercury progress report shall: Indicate which mercury pollutant minimization activities or activities outlined in the Pollutant Minimization Program Plan have been implemented and state which, if any, activities from the Pollutant Minimization Program Plan were not pursued and why; Include an assessment of whether each implemented pollutant minimization activity appears to be effective or ineffective at reducing pollutant discharge concentrations and identify actions planned for the upcoming year; Identification of barriers that have limited program effectiveness and adjustments to the program that will be implemented during the next year to help address these barriers; Include an analysis of trends in total effluent mercury concentrations based on mercury sampling; and Include an analysis of how influent and effluent mercury varies with time and with significant loading of mercury. The first annual mercury progress report is to be submitted by the Due Date.	09/30/2027

Annual Mercury Progress Report : Submit a mercury progress report, related to the pollutant minimization activities for the previous year, as defined above.	09/30/2028
Annual Mercury Progress Report : Submit a mercury progress report, related to the pollutant minimization activities for the previous year, as defined above.	09/30/2029
Annual Mercury Progress Report : Submit a mercury progress report, related to the pollutant minimization activities for the previous year, as defined above.	09/30/2030
Annual Mercury Progress Report : Submit a mercury progress report, related to the pollutant minimization activities for the previous year, as defined above.	09/30/2031
Annual Mercury Reports After Permit Expiration: In the event that this permit is not reissued by the date the permit expires, the permittee shall continue to submit annual mercury reports for the previous year following the due date of Annual Mercury Progress Reports listed above. Annual Mercury Progress reports shall include the information as defined above.	

5.4.1 Explanation of Schedule

The permittee is required to continue the actions in the pollutant minimization plan to maintain effluent quality at or below current levels. This schedule requires a report annually documenting the continued measures.

5.5 Sludge Management Plan

Submit a sludge management plan (SMP) to optimize the sludge management performance and demonstrate compliance with Ch. NR 204, Wis. Adm. Code, by the Due Date.

Required Action	Due Date
Submit Sludge Management Plan: The management plan shall include sufficient detail of the sludge management program for the facility. The plan shall include separate sections for each type of sewage sludge included in this permit. The SMP shall provide standardized information for communication to operators and the department including but not limited to the following: 1) Specify information on the sludge treatment processes for each sampling point and outfall. Include information such as manufacturer, how the unit(s) work, number of units, ideal range of operations, etc. ; 2) Show and describe sample point and outfall monitoring locations on a schematic and provide photos of the specific sampling points. Explain how the samples are collected. For temperature and other automated monitoring, explain the equipment used, how it works, why it is being used under this scenario and any calibration efforts required. 3) Show, describe and tabulate the monitoring requirements at each sampling point and outfall locations; 4) Show, describe and explain sampling protocols for each location listing parameters to be monitored including: a) Pollutants, b) Nutrients c) Pathogen treatment process requirements including treatment temperature, moisture content (total solids) and pathogen densities (fecal concentrations)	01/01/2028

d) Vector Reduction appropriate for the pathogen treatment process such as but not limited to temperatures, volatile solids reduction, moisture content, etc. as required by the WPDES permit and Ch. NR 204, Wis. Adm. Code; 5) Monitoring frequencies at each sample point and outfall; 6) Analytical methods with appropriate hold times and chain-of -custody procedures; 7) Documentation relating to temperature monitoring data recording, retrieval and printing out the data when requested; 8) Storage, verification monitoring, loading, transportation and discharge details associated with all outfalls; 9) Collection, storage, disposal information for sludge detailing pickups including loading and similar details; 10) Collection, storage and disposal processes of sludge when the sludge does not meet minimum requirements to meet Class A and EQ requirements. [Note: EQ and Class A are similar. Facility should explain the difference and how they will handle the material if the material meets Class A but fails to meet EQ.] 11) Identify land application sites; 12) Describe site limitations; 13) Address vegetative cover management and removal including loading to crop needs, crop harvesting; 14) Specify the availability of storage for sludge; 15) Describe the type of transportation and spreading vehicles; 16) Track site loadings to facility's land application sites; 17) Address contingency plans for adverse weather and odor/nuisance abatement; 18) Address construction contingencies when treatment equipment is out of service; and 19) Include any other pertinent information. Once approved, all sludge management activities shall be conducted in accordance with the plan. Any changes to the plan must be approved by the department prior to implementing the changes. NOTE: The SMP is a living document and should be designed and constructed to allow for future updates. Consider providing an overview to explain the facilities solids flow processes, then using sections and appendices to provide more details. NOTE: The use of appendices to explain start up, operation and shutdown of the sludge treatment units is encouraged to show that all sludge particles meet Class A requirements. NOTE: Page numbering is encouraged where each chapter or section has individual page numbers allowing sections and table of contents to be removed and replaced easily without requiring the entire document to be reprinted with new page numbers.	

5.5.1 Explanation of Schedule

An up-to-date Sludge Management Plan is required that documents how the permittee will manage the land application of biosolids consistent with ch. NR 204, Wis. Adm. Code.

Attachments

Water Quality Based Effluent Limitations for Fond du Lac Wastewater Treatment & Resource Recovery Facility WPDES Permit No. WI-0023990-10, Nicole Krueger, dated March 4th, 2025

Fond du Lac Wastewater Treatment and Resource Recovery Facility WPDES Permit WI-0023990-10-0 Water Quality Trading Plan – CONDITIONAL APPROVAL, dated November 3rd, 2026

City of Fond du Lac Water Quality Trading Plan for Conservation Practices at the Fond du Lac County Airport, dated April 2026

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Ashley Clark, Wastewater Specialist

Date: October 5, 2026