March 1, 2021

Laurie Keepers
206 North Water Street
Albany WI, 53502

Subject: Albany WWTF - WPDES Permit WI- 0021199-10
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Laurie Keepers:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Albany WWTF. The initial plan was received in February of 2020 and updated versions were received in September, November, December of 2020 and January of 2021. Based on WDNR review, the final WQT Plan (dated January 2021) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes the transition of farmland and a golf course to perennial grassland vegetation. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be installed by May 1st, 2022. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits beginning June 1st, 2022.

Table 1: Total Phosphorus Credits Available per WQT-2020-0013

<table>
<thead>
<tr>
<th>Year</th>
<th>Available Credits (lbs/yr) – Total</th>
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</thead>
<tbody>
<tr>
<td>2022</td>
<td>219.9</td>
</tr>
<tr>
<td>2023</td>
<td>439.8</td>
</tr>
<tr>
<td>2024</td>
<td>439.8</td>
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<tr>
<td>2025</td>
<td>439.8</td>
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</tbody>
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The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The Department has assigned the WQT plan a tracking number of WQT-2020-0013 and will be referenced as such in the draft WPDES permit. The final WQT plan will be included as part of the public notice package for permit reissuance. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring for total phosphorus.
If you have any questions or comments, please contact me at 608-535-0368 or at sean.spencer@wisconsin.gov

Thank You,

Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:
Tim Astfalk, Mead & Hunt
Joe Miller, Applied Ecological Services
Sean Spencer, WDNR
Nathan Wells, WDNR