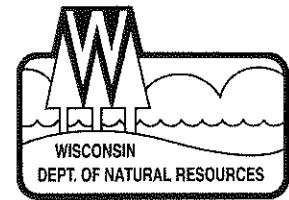


State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
South Central Region Headquarters
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September 4, 2019

Joseph Rose
Director of Public Works
TOWN OF BELOIT
714 E Morning Glory Ln
Beloit, WI 53511-1635

SUBJECT: Conditional Approval of Town of Beloit's Water Quality Trading Plan
Permit: WPDES WI-0026930, Town of Beloit Wastewater Treatment Facility

Dear Mr. Rose:

The Department received the final draft of the Water Quality Trading (WQT) Plan prepared by Donohue & Associates, Inc. on behalf of the Town of Beloit. The final plan, dated June 2019, was received via electronic submittal on June 27, 2019. The Department has reviewed the WQT plan and has no additional comments at this time.

Based on the WDNR review, the WQT Plan is in general conformance with the WDNR Water Quality Trading Guidance and requirements contained in Wis. Stat 283.84. The plan indicates that the Town of Beloit will utilize WQT to comply with the effluent limitations for total phosphorus for their discharge to the Rock River through trading with an upstream point source (City of Columbus) for Rock River TMDL allocations. The WQT Plan proposes the purchase of a total of 1,100 lbs/year of phosphorus credits for the next five years. This credit generation will be reflected in the applicable effluent limits.

The WDNR conditionally approves the WQT Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the WQT plan a tracking number of WQT-2019-0014 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. WDNR will review the data provided by the Town of Beloit to assess whether any additional modifications to the WQT Plan and associated water quality trades are required prior to reissuance of the next WPDES permit.

If you have any questions or comments, please contact me at 608-275-7775 or at sean.spencer@wisconsin.gov.

Sincerely,

Sean Spencer
Wastewater Specialist

cc: Permit File
Amy Garbe
Matt Claunchery