



January 21, 2020

James Haggerty, Engineer/DPW
300 Slinger Road
Slinger, WI 53086

Subject: Slinger Wastewater Treatment Facility- WPDES Permit WI-0020290
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Haggerty:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Slinger Wastewater Facility. The initial plan was received in May of 2019 and updated versions were received in August of 2019 and December of 2019. Based on WDNR review, the final WQT Plan (dated December 2019) is in general conformance with the WDNR Water Quality Trading Guidance and Wis. Stat 283.84. As a condition of approval, please note the following:

Proposed Aquatic Habitat Adjustment – The WQT plan proposes to install in-stream habitat at streambank stabilization sites. Per WDNR guidance, an aquatic habitat adjustment may reduce the uncertainty factor of a practice (lowering the trade ratio) if the management measure or practice addresses both the traded pollutant and specific habitat impairments. The WQT Plan, as currently drafted, has not provided specific designs or descriptions for habitat features but rather general statements about types of habitat features, and that “The Village plans to fulfill habitat restoration requirements through installing fish habitat structures under the stream habitat general permit”. Please note that rip-rap and planting work alone will not qualify for the habitat adjustment.

Final Plans - Final methods for streambank stabilization have not been included in the WQT plan, as stated “The proposed streambank stabilization project is still in conceptual planning stages. For this reason, a complete design of the proposed stabilization measures on the banks of the Rubicon River has not been completed”.

Due to the above, the following conditions are included as part of this conditional approval:

- The first required WQT report after project installation must include the following:
 - Water Quality Trading Practice Registration Form
 - Water Quality Trade Agreement(s) with the Village of Hartford and any other applicable party to support the trade pursuant to s. 283.84(1) Wis. Stats.
 - Designs and descriptions of stabilization methods and habitat features installed.
 - Final operation and maintenance plan for the project. (the WQT agreement may contain O&M provisions to address this requirement)
- Design of the stabilized streambank must result no sediment entering the waterway at the project site.
- The applicable trade ratio, absent an aquatic habitat adjustment, is 3.4:1. Credit availability may reflect this through a permit modification if suitable habitat is not installed.
- This approval does not supplant the need for approved Ch. 30 waterway permits prior to conducting work.
- Implementing streambank stabilization projects on the south bank (sites SB 1 – SB 4) will not be a requirement of the conditionally approved WQT Plan. Credit availability (Table 1) reflects this approach.

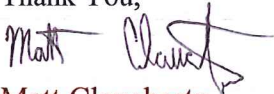
Table 1: Total Phosphorus Credits Available per WQT-2020-0001

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2020	0	0	0
2021	8.3	22.5	30.8
2022	16.6	45	61.6
2023	16.6	45	61.6
2024	16.6	45	61.6
2025	16.6	45	61.6

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The WDNR has assigned the WQT plan a tracking number of WQT-2020-0001 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)-264-9244 or at matthew.claucherty@wisconsin.gov

Thank You,



Matt Claucherty

Water Resources Management Specialist
Wisconsin Department of Natural Resources

e-CC:

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