



August 1, 2019

Rob Minnema, Director of Utilities
1213 N. Center St.
Beaver Dam, WI 53916

Subject: Conditional Approval of Beaver Dam's Adaptive Management Plan
Permit: WPDES WI-0023345, Beaver Dam Wastewater Treatment Facility

Dear Mr. Minnema:

The Department received the final draft of the Adaptive Management (AM) Plan prepared by Applied Technologies, Inc. on behalf of the City of Beaver Dam. The final plan, dated July 2019, was received via electronic submittal on July 17, 2019. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the City of Beaver Dam will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the Beaver Dam Wastewater Treatment Facility, Outfall 001, to the Beaver Dam River. Actions outlined in the AM plan involve nonpoint phosphorus reductions throughout the Beaver Dam River Watershed, identified as the AM plan's action area. For continued AM eligibility, phosphorus reductions undertaken by the City of Beaver Dam WWTF and various AM partners are expected to offset the WWTF's proportional phosphorus loading to the Beaver Dam River, 4050 lbs/yr, within the first permit term.

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2019-0013 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The department appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at (608) 264-9244 or email matthew.claucherty@wisconsin.gov.

Sincerely,

Matt Claucherty
Wisconsin Department of Natural Resources

e-cc Leo Kucek, Applied Technologies
 Doris Thiele, WDNR
 Sean Spencer, WDNR