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WISCONSIN
DEPT. OF NATURAL RESOURCES

9/23/2024

Simon Larson, Complete Filtration Resources
1900 E 24th Street
Marshfield, WI 54449

Subject: Cambrian Innovation - WPDES Permit WI-0067041
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Larson:

The Department recently received a water quality trading plan (WQT Plan) supporting compliance with phosphorus effluent limits applicable to the new Cambrian Innovation Wastewater Treatment System. The initial plan was received in March of 2021, with subsequent versions received in March and August of 2024. Based on WDNR review, the final WQT Plan (dated 8/30/2024) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes discontinuation of Saputo Cheese spray irrigation as well as conversion of row crop agriculture to perennial vegetation. The timeline for practice installation, as set forth in the WQT plan, indicates row cropped fields will be converted to perennial vegetation by October 31, 2024 and spray irrigation will cease by August 31, 2025. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into Cambrian Innovation's draft WPDES permit and will be used to demonstrate compliance with phosphorus effluent limits upon commencement of discharge.

Table 1: Total Phosphorus Credits Available per WQT-2024-0023

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2025	66.5	0	66.5
2026	357.4	8.2	365.6
2027	353.5	12.4	365.9
2028	393.4	15.4	408.8
2029	385.6	16.6	402.2
2030	424.5	17.3	441.8

The Department conditionally approves the WQT Plan as a basis for water quality trading during the upcoming WPDES permit term. The Department has assigned the WQT plan a tracking number of WQT-2024-0023 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 issuance. 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) 400-5596 or by email at matthew.claucherty@wisconsn.gov

Thank You,



Matt Claucherty
Phosphorus Implementation Coordinator
Wisconsin Department of Natural Resources

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