State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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July 7th, 2021

Bill Frisbee, Director of Water Resources
2400 Springbrook Court
Beloit, WI 53511

Subject: Beloit WWWTF - WPDES Permit WI- 0023370-10
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Bill Frisbee:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the City of Beloit WWTF. The initial plan was received in October of 2019 and updated versions were received in December of 2020 and March of 2021. Based on WDNR review, the final WQT Plan (dated March 2021) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes installation of cover crops, barnyard practices, and grassed waterways on agricultural lands. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be installed by June 30th, 2022. Credits generated from approved practices result in available credit quantities shown in Table 1. The interim credits listed below will not be available for use 10 years after the practices are installed. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits beginning July 1st, 2022.

Table 1: Total Phosphorus Credits Available per WQT-2021-0008

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2022	376.97	697.83	1074.5
2023	753.94	1395.65	2149
2024	753.94	1395.65	2149
2025	753.94	1395.65	2149

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. This approval is not to be construed as an approval for any activities requiring a permit under ch. 30 or 31, Wis. Stats. The Department has assigned the WQT plan a tracking number of WQT-2021-0008 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@wisconsn.gov

Thank You,

Sean Spencer

Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

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