State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
3911 Fish Hatchery Road
Fitchburg, WI 53711

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

April 10, 2025

Chris McGlynn
Clerk/Treasurer
5630 Main Street
Gratiot, WI 53541

Subject: Gratiot Wastewater Treatment Facility - WPDES Permit WI-0024139
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Chris McGlynn:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Gratiot Wastewater Treatment Facility. The initial plan was received in December of 2024 and updated versions were received in February and March of 2025. Based on WDNR review, the final WQT Plan (dated March 2025) 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 streambank stabilization. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be installed by October 2026. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits beginning January 1, 2026.

Please note that this WQT plan approval is not to be construed as approval to commence work regulated under other state or local authorities, such as Chapter 30 waterways and wetlands permitting, floodplain, or construction activities.

Table 1: Total Phosphorus Credits Available per WQT-2025-0011

Year	Available Credits (lbs/yr) – Total
2026	289
2027	289
2028	289
2029	289
2030	289
2031	289

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The Department has assigned the WQT plan a tracking number of WQT-2025-0011 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 608-419-4155 or at betsyjo.howe@wisconsin.gov.

Thank You,

BetsyJo Howe

BetsyJo Howe
Regional WQT Coordinator
Wisconsin Department of Natural Resources

e-CC:
Dick Herbst, Village
Raymond Pickett, Village
Logan Hoppman, Delta 3 Engineering
Jordan Fure, Delta 3 Engineering
Amanda Perdzock, WDNR
Caitlin Oconnell, WDNR
Matt Claucherty, WDNR