



November 18, 2020

Robert Baecker, Mayor
City of Independence
PO Box 189
Independence, WI 54747

Subject: Independence Wastewater Treatment Facility - WPDES Permit WI-0024287
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Baecker


The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Independence Wastewater Treatment Facility. The initial plan was received in September of 2020 and an updated version was received in October 2020. Based on WDNR review, the final WQT Plan (dated October 27, 2020) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes to generate 241.4 lbs/yr of phosphorus credits with streambank stabilization in Bruce Valley Creek and the Trempealeau River. These credits will be used for compliance with the WPDES permit effluent limits. The table below summarized the total proposed phosphorus credits. These credits are generated and expire on a calendar year basis.

Project	TP Reduction (lbs/yr)	Trade Ratio	Credits (lbs/yr)
Blaha Site	436	2:1	218
Four Seasons Park	70.3	3:1	23.4
Total			241.4 lbs/yr

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-2020-0015 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 715-225-4705 or at benjamin.hartenbower@wisconsin.gov

Thank You,


Benjamin Hartenbower, P.E.
Water Resources Engineer
Wisconsin Department of Natural Resources

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