State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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January 3, 2024

Keith Bone
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Subject: Richland Center Renewable Energy - WPDES Permit WI-0064718
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Gatzke:

The Department recently received a water quality trading plan (WQT Plan) for ongoing compliance with phosphorus effluent limits at Richland Center Renewable Energy. The plan was received in August of 2023 and an updated version was received in December 2023. Based on WDNR review, the final WQT Plan (dated December 2023) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes to install and maintain permanent vegetation cover on previously farmed fields. The conversion to permanent vegetation occurred in September 2023, and will remain continuously vegetated and non-fertilized for the duration of the WQT. The 5-year averaging period for credit generation will be 2024 through 2028. 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, 2024.

Table 1: Total Phosphorus Credits Available per WQT-2023-0010.

Year	Available Credits (lbs/yr) – Total
2024	106.6
2025	106.6
2026	106.6
2027	106.6
2028	106.6

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-2023-0010 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@wisconsn.gov

Thank You,

BetsyJo Howe

BetsyJo Howe
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:

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