State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1300 W. Clairemont Avenue
Eau Claire, WI 54701

Tony Evers, Governor
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February 26, 2025

Mike Henke, Mayor
City of Stanley
919 Emery Street
Stanley, WI 54768-0155

Subject: Stanley WWTF WPDES Permit #WI-0021857
Water Quality Trading Plan – CONDITIONAL CREDIT CERTIFICATION

Dear Mr. Henke,

The Wisconsin Department of Natural Resources (department) received a final draft of the updated water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at Stanley Wastewater Treatment Facility on 02/26/2025. Based on department review, the final WQT Plan is in general conformance with the department Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes generation of phosphorus credits via conversion of fields previously in crop production to permanent grassland. The practices are anticipated to be installed in spring of 2025, therefore credits are prorated for the first year of installation as credits are only anticipated to be generated for part of the year. Considering an establishment period, from spring planting to mid-summer, credits will become available to the facility on July 1, 2025. 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 in the reissued permit.

*In the event that the permit is not reissued prior to the expiration date, annual available TP credits listed below will be available in the subsequent year(s).

Table 1: Total Phosphorus Credits Available per WQT-2025-0006

Year	Available TP Credits Total (lbs/yr)
2025	55
2026	110
2027	110
2028	110
2029	110
2030	110*

The department conditionally certifies the WQT Plan as a basis for water quality trading during the next WPDES permit term. A condition of this certification is that prior to being implemented into the WPDES permit the city of Stanley must enter into a signed written legal agreement with the department. This certification will be rescinded if an agreement cannot be reached.

The department has assigned the WQT plan a tracking number of WQT-2025-0006 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 715-492-4323 or at jenna.monahan@wisconsin.gov

Thank You,

Jenna Monahan

Jenna Monahan, P.E.
Wastewater Engineer - West Central Region
Wisconsin Department of Natural Resources

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