State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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WISCONSIN
DEPT. OF NATURAL RESOURCES

October 31, 2024

Liz Wilkinson
Village Clerk
401 Wisconsin St
Avoca, WI 53506

Subject: Avoca Wastewater Treatment Facility - WPDES Permit WI-0060151
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Liz Wilkinson:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Avoca Wastewater Treatment Facility. The initial plan was received in January of 2024 and updated versions were received in August and October of 2024. Based on WDNR review, the final WQT Plan (dated August 2024) 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 which will utilize grading and vegetation establishment to prevent erosion of sediment from the streambanks of Morrey Creek. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be installed by October 31st, 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 beginning November 1st, 2025.

Table 1: Total Phosphorus Credits Available per WQT-2024-0024

Year	Available Credits (lbs/yr) – Total
2025	32
2026	192
2027	192
2028	192
2029	192
2030	192

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-2024-0024 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
Water Quality Trading Coordinator
Wisconsin Department of Natural Resources

e-CC:

Ronee Harris, Village of Avoca
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Lisa Creegan, WDNR
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