State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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8/21/2024

Amanda Blank, Plant Manager
4201 S Walters Road
Beloit, WI 53511

Subject: WPL Riverside Energy Center - WPDES Permit WI-0061921
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Ms. Blank:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the WPL Riverside Energy Center. The initial plan was received in July of 2023 and plan amendments were received in November of 2023 and August of 2024. Based on WDNR review, the final WQT Plan (dated 7/21/2023 with amendments dated 11/15/2023 and 8/15/2024) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes ongoing use of WPL-owned lands kept in perennial vegetation to generate credits for the duration of the next permit term. 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 total phosphorus effluent limits throughout the permit term.

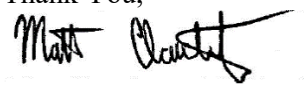
Table 1: Total Phosphorus Credits Available per WQT-2024-0020

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2024	0	108.8	108.8
2025	0	106.6	106.6
2026	0	106.6	106.6
2027	0	134.4	134.4
2028	0	138.2	138.2
2029	0	138.2	138.2

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-2024-0020 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) 400 - 5596 or at matthew.claucherty@wisconsin.gov.

Thank You,



Matt Claucherty
Phosphorus Implementation Coordinator
Wisconsin Department of Natural Resources

e-CC:

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