



October 5, 2018

Rick Stewart, President
VPP Group, LLC
PO Box 227
Norwalk, WI 54648

Subject: VPP Group, LLC WPDES Permit #WI-0052931
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Stewart:

Thank you for submitting the final draft of the Water Quality Trading (WQT) Plan on behalf of VPP Group, LLC in Norwalk. The final plan was received on October 5th, 2018. The Department has reviewed the additional documentation and final report and has no comments at this time.

Based on the WDNR review, the WQT Plan is in general conformance with the WDNR Water Quality Trading Guidance and Wis. Stat 283.84. The WQT plan indicates that VPP Group, LLC will utilize Water Quality Trading to comply with the effluent limitations for TP for their discharge to the Moore Creek through water quality trading credits generated from a stream bank restoration project located at Moore Creek upstream of the point of discharge. The WQT Plan proposes the generation of 14.85 lbs/yr of phosphorus credits. This credit generation will be reflected in the applicable effluent limits.

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The WDNR has assigned the WQT plan a tracking number of WQT-2018-0011 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. WDNR will review the data provided by VPP Group, LLC to assess whether any additional modifications to the WQT Plan and associated water quality trades are required prior to reissuance of the next WPDES permit.

If you have any questions or comments, please contact me at 715-839-3712 or at benjamin.hartenbower@wisconsin.gov

Sincerely,

Benjamin Hartenbower, P.E.
Wastewater Engineer

CC (email): Steve Turriff, VPP Group
Chad Olsen, McMahon
Julia Stephenson, WDNR