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June 6, 2023

Peter Hartz
Wastewater Manager
800 Hoffman Drive
Watertown, WI 53094

Subject: Watertown WWTF - WPDES Permit WI- 0028541
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Hartz:

The Department recently received a water quality trading plan (WQT Plan) for compliance with total suspended solids (TSS) effluent limits at the Watertown Wastewater Treatment Facility. Based on the Department's review, the WQT Plan (dated December 2022) is in general conformance with *Guidance for Implementing Water Quality Trading in WPDES Permits* and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes installation of cover crop practices on agricultural lands and wetland restoration. The timeline for practice installation, as set forth in the WQT plan, indicates practices were installed by August 31, 2022. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued/modified WPDES permit and will be used to demonstrate compliance with TSS effluent. The June 2022 phosphorus trade and December 2022 TSS trade plans will be referenced together as one document in the modified permit via the tracking number WQT-2023-0004.

Table 1: Total Phosphorus and TSS Credits Available per WQT-2023-0004

Year	Available Phosphorus Credits (lbs/yr)	Available TSS Credits (lbs/yr) Interim	Available TSS Credits (lbs/yr) Long Term
2022	25.5	N/A	N/A
2023	102	500	3,200
2024	102	500	3,200
2025	102	500	3,200
2026	102	500	3,200
2027	102	500	3,200

Please note that the Department intends to publish edge-of-field phosphorus and TSS targets in an effort to modernize the Rock River TMDL. These values will be published in guidance once complete. Future updates to Watertown's Water Quality Trading Plan will need to use these edge-of-field values when defining the credit threshold and corresponding interim / long-term credit quantities. Interim credits are not available for use beyond 10 years following practice installation.

The Department conditionally approves the WQT Plan as a basis for water quality trading during the WPDES permit term. This approval is not to be construed as an approval for any activities requiring a permit under ch. 30 or 31, Wis. Stats. The Department has assigned the WQT plan a tracking number of WQT-2023-0004 and will be referenced as such in the draft/modified WPDES permit. The final WQT plan (combined Phosphorus and TSS documents) 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 and TSS.

If you have any questions or comments, please contact me at 608-400-5596 or at matthew.claucherty@wisconsin.gov

Thank You,



Matt Claucherty
Water Resources Management Specialist
Wisconsin Department of Natural Resources

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