

La Farge Permit Fact Sheet

General Information

Permit Number	WI-0024465-12-0
Permittee	Village of La Farge, 105 W. Main Street, La Farge, WI 54639
Permitted Facility	La Farge Wastewater Treatment Facility, S4459 State Highway 131, La Farge, WI 54639
Permit Term	October 01, 2025 to September 30, 2030
Discharge Location	North bank of the Kickapoo River, 180 feet West of Highway 131 South bridge that crosses over Bear Creek
Receiving Water	Kickapoo River in Middle Kickapoo River Watershed of the Lower Wisconsin River Basin in Vernon County
Stream Flow ($Q_{7,10}$)	63.0 cfs
Stream Classification	Warmwater Sport Fishery, Non-Public Water Supply
Discharge Type	Existing, continuous
Annual Average Design Flow	0.172 MGD
Industrial or Commercial Contributors	None
Plant Classification	A1 - Suspended Growth Processes; B - Solids Separation; C - Biological Solids/Sludges; P - Total Phosphorus; D - Disinfection; SS - Sanitary Sewage Collection System
Approved Pretreatment Program?	N/A

Facility Description

The La Farge Wastewater Treatment Facility treats domestic wastewater from the Village of La Farge. The annual average design flow of the facility is 0.172 million gallons per day (MGD) and had an actual annual average influent flow of 0.092 MGD in 2024. Primary treatment consists of a fine screen and auger for grit removal and an equalization tank (not typically in use). Effluent then goes through a secondary treatment process of activated sludge and a final clarifier. Currently effluent is disinfected seasonally via chlorination and dechlorination prior to discharge to the Kickapoo River. The facility anticipates installing an ultraviolet (UV) disinfection system prior to the 2026 disinfection season to replace the chlorination system. The facility adds aluminum sulfate to the activated sludge basin to remove phosphorus. Aerobic sludge digestion occurs and liquid or cake sludge is land applied on Department approved sites or hauled to a landfill. The Department has approved water quality trading (WQT) as the method of complying with effluent phosphorus limits at Outfall 001. The Village of La Farge submitted a WQT Plan (WQT-2025-0010) that provides details of the trade. The plan provides calculations and a table that shows the amount of phosphorus credits that will be available each year. Even with phosphorus credits available, there is still a phosphorus monthly average concentration effluent limit of 1 mg/L that acts as the minimum control level and applies to outfall 001. Significant influent monitoring changes are as follows: 1) the sample frequency for flow has changed from “continuous” to “daily” for eDMR reporting purposes. Significant effluent monitoring and/or limit changes are as follows: 1) the sample frequency for flow has changed from “continuous” to “daily” for eDMR reporting purposes, 2) fecal coliform monitoring & limits have been replaced with *Escherichia coli* (*E. coli*) monitoring and limits, 3) annual total nitrogen monitoring (TKN, NO₂+NO₃ and Total Nitrogen) added, and 4) because La Farge is replacing their chlorination disinfection system with ultraviolet light, clarification language has been

added stating that chlorine monitoring and limits only apply if they use chlorine for disinfection. The following changes were made at the sludge/land application outfalls: 1) A requirement has been added that sludge be monitored annually for radium-226, 2) PFAS sludge sampling has been included in the permit pursuant to ss. NR214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code, 3) PCB monitoring was removed from the cake sludge Outfall 003, and 4) language was added at Outfall 003 clarifying that List 2 nutrient monitoring is only required if the cake sludge is land applied.

Substantial Compliance Determination

Enforcement During Last Permit: A Notice of Noncompliance (NON) was issued in 2020 for a Sanitary Sewer Overflow. Another NON was issued in May 2023 for 2022 fecal coliform violations. Throughout the permit term, there have been violations for fecal coliform, phosphorus, and sludge sampling underreporting. The facility has completed all previously required actions as part of the enforcement process.

After a desk top review of all discharge monitoring reports, CMARs, land app reports, compliance schedule items, and a site visit on June 19, 2025, this facility has been found to be in substantial compliance with their current permit.

Compliance determination entered by Wastewater Compliance Engineer, Katie Jo Jerzak, PE on June 23, 2025.

Sample Point Descriptions

Sample Point Designation		
Sample Point Number	Discharge Flow, Units, and Averaging Period	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)
701	Influent: 0.092 MGD (2024)	Representative influent samples shall be taken downstream of grit channel.
001	Effluent to Kickapoo River: 0.077 MGD	Representative effluent samples shall be taken at the effluent sampling manhole after disinfection. BOD samples need to be seeded if disinfection is taking place. All samples shall be taken prior to discharge to the Kickapoo River
002	5 dry US tons/year (per reissuance application)	Prior to landspreading, representative liquid sludge samples shall be collected from the aerobic digester and monitored as indicated below, annually for Lists 1, 2, 3 & 4, PFAS, and Radium-226 and once in 2026 for PCBs.
003	1 dry US ton/year (per reissuance application)	Prior to landspreading representative cake sludge samples shall be collected from the drying beds and monitored as indicated below, annually for Lists 1, 2, 3 & 4, PFAS and Radium-226. If sludge is sent to a landfill, sludge shall be monitored annually for List 1, PFAS and Radium-226.

Permit Requirements

1 Influent – Monitoring Requirements

1.1 Sample Point Number: 701- INFLUENT TO PLANT

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Continuous	
BOD5, Total		mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total		mg/L	3/Week	24-Hr Flow Prop Comp	

Changes from Previous Permit:

Influent limitations and monitoring requirements were evaluated for this permit term. The following changes was made:
1) the sample frequency for flow has been changed from “continuous” to “daily” for eDMR reporting purposes.

Explanation of Limits and Monitoring Requirements

Monitoring of influent flow, BOD5 and total suspended solids is required by s. NR 210.04(2), Wis. Adm. Code, to assess wastewater strengths and volumes and to demonstrate the percent removal requirements in s. NR 210.05, Wis. Adm. Code, and in the Standard Requirements section of the permit.

2 Surface Water - Monitoring and Limitations

2.1 Sample Point Number: 001- EFFLUENT TO KICKAPOO RIVER

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Flow Rate		MGD	Daily	Continuous	
BOD5, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow Prop Comp	
BOD5, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Weekly Avg	45 mg/L	3/Week	24-Hr Flow Prop Comp	
Suspended Solids, Total	Monthly Avg	30 mg/L	3/Week	24-Hr Flow Prop Comp	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
pH Field	Daily Min	6.0 su	Daily	Grab	
pH Field	Daily Max	9.0 su	Daily	Grab	
E. coli	Geometric Mean - Monthly	126 #/100 ml	Weekly	Grab	Limit & monitoring apply May-Sept
E. coli	% Exceedance	10 Percent	Monthly	Calculated	Limit & monitoring apply May-Sept. See the E. coli Percent Limit section in the permit. Enter the result in the DMR on the last day of the month.
Chlorine, Total Residual	Daily Max	38 ug/L	Daily	Grab	Chlorine monitoring & limits apply May - Sept when chlorination is used for disinfection.
Chlorine, Total Residual	Weekly Avg	38 ug/L	Daily	Grab	
Chlorine, Total Residual	Monthly Avg	38 ug/L	Daily	Grab	
Phosphorus, Total	Monthly Avg	1.0 mg/L	3/Week	24-Hr Flow Prop Comp	Limit effective throughout the permit term, as it represents a minimum control level.
Phosphorus, Total		lbs/day	3/Week	Calculated	Report daily mass discharged using Equation 1a. in the Water Quality Trading (WQT) section.
WQT Credits Used (TP)		lbs/month	Monthly	Calculated	Report WQT TP Credits used per month using Equation 2c. in the Water Quality Trading (WQT) section in the permit. Available TP Credits are specified in Table 2 and in the approved Water Quality Trading Plan.
WQT Credits Used (TP)	Annual Total	201 lbs/yr	Annual	Calculated	The sum of total monthly credits used may not exceed Table 2 values listed below.
WQT Computed Compliance (TP)	6-Month Avg	0.1 mg/L	Monthly	Calculated	Compliance with the six-month average limit is evaluated at the end of the six-month period on June

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
					30 and Dec 31.
WQT Computed Compliance (TP)	Monthly Avg	0.3 mg/L	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 3a. in the Water Quality Trading (WQT) section in the permit. Value entered on the last day of the month.
WQT Computed Compliance (TP)	6-Month Avg	0.14 lbs/day	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 3b. in the Water Quality Trading (WQT) section. Compliance with the six-month average limit is evaluated at the end of the six-month period on June 30 and Dec 31.
Nitrogen, Total Kjeldahl		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in permit.
Nitrogen, Nitrite + Nitrate Total		mg/L	See Listed Qtr(s)	24-Hr Flow Prop Comp	
Nitrogen, Total		mg/L	See Listed Qtr(s)	Calculated	Monitoring required annually in specific quarters. See Nitrogen Series Monitoring section in permit. Total Nitrogen shall be calculated as the sum of reported values for Total Kjeldahl Nitrogen and Total Nitrite + Nitrate Nitrogen.
Acute WET		TUa	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET testing section in permit.

Changes from Previous Permit

Effluent limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit: 1) The sample frequency for flow has been changed from “continuous” to “daily” for eDMR reporting purposes, 2) fecal coliform monitoring & limits have been replaced with *Escherichia coli* (*E. coli*) monitoring and limits, 3) total nitrogen monitoring (TKN, NO₂+NO₃ and Total Nitrogen) added during specific quarters as outlined in the permit, 4) the department approved the Water Quality Trading Plan (WQT-2025-0010) submitted by the permittee as a way to demonstrate compliance with water quality based effluent limits (WQBELs) for total phosphorus,

and 5) because La Farge is replacing their chlorination disinfection system with ultraviolet light, clarification language has been added stating that chlorine monitoring and limits only apply if they use chlorine for disinfection

Explanation of Limits and Monitoring Requirements

Monitoring Frequencies- The *Monitoring Frequencies for Individual Wastewater Permits guidance* (April 12, 2021) recommends that standard monitoring frequencies be included in individual wastewater permits based on the size and type of the facility, in order to characterize effluent quality and variability, to detect events of noncompliance, and to ensure consistency in permits issued across the state. Guidance and requirements in administrative code were considered when determining the appropriate monitoring frequencies for pollutants that have final effluent limits in effect during this permit term. At this time, no effluent monitoring frequency changes are included in the permit.

Limits were determined for La Farge's existing discharge to the Kickapoo River using chs. NR 102, 104, 105, 106, 207, 210, 212 and 217 of the Wisconsin Administrative Code (where applicable). For additional information on any of the limits see the May 1, 2023 memo from Ben Hartenbower to Angela Parkhurst titled "Water Quality-Based Effluent Limitations for the La Farge Wastewater Treatment Facility WPDES Permit No. WI-0024465".

MUNICIPAL EFFLUENT LIMITS – In accordance with the federal regulation 40 CFR 122.45(d), and to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7), Wis. Adm. Codes, limits in this permit are to be expressed as weekly average and monthly average limits whenever practicable.

BOD, TSS and pH: Categorical limits and WQBELs are included in the permit as outlined in ch. NR 210, Wis. Adm. Code. The effluent limitations for BOD5, Total Suspended Solids (TSS) and pH are carried over from the previous permit and are not subject to change at this time because the receiving water characteristics have not changed.

Disinfection/E. Coli: Fecal coliform monitoring and limits have been replaced with *Escherichia coli* (*E. coli*) monitoring and limits. Revisions to bacteria surface water quality criteria to protect recreational uses and accompanying *E. coli* WPDES permit implementation procedures became effective May 1, 2020. The new rule requires that WPDES permits for facilities with required disinfection include monitoring for *E. coli* while facilities are disinfecting during the recreation period and establish effluent limitations for *E. coli* established in s. NR 210.06 (2), Wis. Adm. Code. The administrative code rule changes included the following actions: revised the bacteria water quality criteria from fecal coliform to *E. coli* to protect recreation in ch. NR 102, Wis. Adm. Code.; removed fecal coliform criteria for certain individual waters from ch. NR 104, Wis. Adm. Code.; revised permit requirements for publicly and privately owned sewage treatment works in ch. NR 210, Wis. Adm. Code.; and, updated approved analytical methods for bacteria in ch. NR 219, Wis. Adm. Code.

At permit reissuance, La Farge's method of disinfection is chlorination May-Sept prior to discharge to the Kickapoo River. They plan to install an ultraviolet disinfection system in 2026, therefore language was added to the permit clarifying that monitoring and limits for chlorine only apply May – Sept when the permittee is using chlorination for disinfection.

Phosphorus – Phosphorus requirements are based on the Phosphorus Rules that became effective December 1, 2010 as detailed in NR 102 Water Quality Standards and NR 217 Effluent Standards and Limitations for Phosphorus. Chapter NR 217 of the Wis. Adm. Code addresses point source dischargers of phosphorus to surface waters. Currently in NR 217 Wis. Adm. Code there are two methods used to determine if a phosphorus limit is needed: a technology based effluent limit (TBEL) and a water quality based effluent limit (WQBEL). Based on the size and classification of the stream, the water quality criteria for the Kickapoo River is 0.100 mg/L. In this case, the WQBEL is 0.300 mg/L (monthly average), 0.100 mg/L & 0.14 lbs/day (6-month average). For the reasons explained in the April 30, 2012 paper entitled 'Justification for Use of Monthly, Growing Season and Annual Average Periods for Expression of WPDES Permit Limits for Phosphorus Discharges in Wisconsin', WDNr has determined that it is impracticable to express the phosphorus WQBEL for the permittee as a maximum daily, weekly or monthly value. The final effluent limit for phosphorus is expressed as a six-month average. It is also expressed as a monthly average equal to three times the derived WQBEL (which equates to 0.300 mg/L). This final effluent limit was derived from and complies with the applicable water quality criterion. A phosphorus concentration limit is necessary to prevent backsliding during the term of the permit. The TBEL limit of 1.0 mg/L will be retained in the permit as a minimum control level.

The wastewater treatment facility is not able to meet the WQBEL. This permit authorizes the use of trading as a tool to demonstrate compliance with the phosphorus WQBELs. This permit includes terms and conditions related to the Water Quality Trading Plan (WQT-2025-0010) or approved amendments thereof. The total ‘WQT TP Credits’ available are designated in the approved WQT Plan. The Sanitary District installed streambank stabilization practices. The WQT Plan proposes the generation of 201 lbs/yr of phosphorus credits for the next five years.

Additional WQT subsections in the permit provide information on compliance determinations, annual reporting and re-opening of the permit.

Total Nitrogen Monitoring (NO₂+NO₃, TKN and Total N)- The Department has included effluent monitoring for Total Nitrogen in the permit through the authority under §§ 283.55(1)(e), Wis. Stats., which allows the department to require the permittee to submit information necessary to identify the type and quantity of any pollutants discharged from the point source, and through s. NR 200.065(1)(h), Wis. Adm. Code, which allows for this monitoring to be collected during the permit term. More information on the justification to include total nitrogen monitoring in wastewater permits can be found in the “Guidance for Total Nitrogen Monitoring in Wastewater Permits” dated October 1, 2019. See the permit for the specific quarters that testing is required.

PFOS and PFOA: NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Pursuant to s. NR 106.98(3)(b), Wis. Adm. Code, the department evaluated the need for PFOS and PFOA monitoring taking into consideration the presence of potential PFOS or PFOA industrial wastes, remediation sites and other potential sources of PFOS or PFOA. Based on information available at the time the permit was drafted, the department has determined the permittee does not need to sample for PFOS or PFOA as part of this permit reissuance. The department may re-evaluate the need for sampling at the next permit reissuance if new information becomes available that suggests PFOS or PFOA may be present in the discharge.

3 Land Application - Monitoring and Limitations

Municipal Sludge Description						
Sample Point	Sludge Class (A or B)	Sludge Type (Liquid or Cake)	Pathogen Reduction Method	Vector Attraction Method	Reuse Option	Amount Reused/Disposed (Dry Tons/Year)
002	B	Liquid	Fecal coliform	Incorporation, Injection and/or Aerobic SOUR	Land application	5
003	B	Cake	N/A	Incorporation	Landfill or Land Application	1
Does sludge management demonstrate compliance? Yes						
Is additional sludge storage required? No						
Is Radium-226 present in the water supply at a level greater than 2 pCi/liter? Yes, therefore monitoring of sludge is required annually for radium-226. Recycling conditions are also included in the permit to track any potential problems in land applying sludge from this facility.						
Is a priority pollutant scan required? No						
Priority pollutant scans are required once every 10 years at facilities with design flows between 5 MGD and 40 MGD, and once every 5 years if design flow is greater than 40 MGD.						

3.1 Sample Point Number: 002- LIQUID SLUDGE

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Solids, Total		Percent	Annual	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Annual	Composite	
Cadmium Dry Wt	Ceiling	85 mg/kg	Annual	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Annual	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Annual	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Annual	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Annual	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Annual	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Annual	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Annual	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Annual	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Annual	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Annual	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Annual	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Annual	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Annual	Composite	
Nitrogen, Total Kjeldahl		Percent	Annual	Composite	
Nitrogen, Ammonium (NH ₄ -N) Total		Percent	Annual	Composite	
Phosphorus, Total		Percent	Annual	Composite	
Phosphorus, Water Extractable		% of Tot P	Annual	Composite	
Potassium, Total Recoverable		Percent	Annual	Composite	
PFOA + PFOS		ug/kg	Annual	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.
Radium 226 Dry Wt		pCi/g	Annual	Composite	
PCB Total Dry Wt	Ceiling	50 mg/kg	Once	Composite	Required once in 2026
PCB Total Dry Wt	High Quality	10 mg/kg	Once	Composite	Required once in 2026

Changes from Previous Permit:

Sludge limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit: 1) PFAS monitoring was added annually pursuant to s. NR 204.06(2)(b)9., Wis. Adm. Code, and 2) radium 226 monitoring was added annually because the La Farge Waterworks had a hit of radium 226 in the drinking water of 2.5 pCi/g on 03/25/2020.

Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Limitations for PCBs are addressed in s. NR 204.07(3)(k). Radium requirements are addressed in s. NR 204.07(3)(n).

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA has developed a draft risk assessment to determine potential risks associated with land applying residuals which contain PFOA and/or PFOS. The DNR is evaluating this information and may alter the current approach based on this review. In the interim, the department has developed the “Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS.”

Collecting sludge data on PFAS concentrations from a wide range of wastewater treatment facilities will help protect public health from exposure to elevated levels of PFAS and determine the department’s implementation of EPA’s recommendations. To quantitate this risk, PFAS sampling has been included in this WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

3.2 Sample Point Number: 003- CAKE SLUDGE

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Solids, Total		Percent	Annual	Composite	
Arsenic Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Arsenic Dry Wt	High Quality	41 mg/kg	Annual	Composite	

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Cadmium Dry Wt	Ceiling	85 mg/kg	Annual	Composite	
Cadmium Dry Wt	High Quality	39 mg/kg	Annual	Composite	
Copper Dry Wt	Ceiling	4,300 mg/kg	Annual	Composite	
Copper Dry Wt	High Quality	1,500 mg/kg	Annual	Composite	
Lead Dry Wt	Ceiling	840 mg/kg	Annual	Composite	
Lead Dry Wt	High Quality	300 mg/kg	Annual	Composite	
Mercury Dry Wt	Ceiling	57 mg/kg	Annual	Composite	
Mercury Dry Wt	High Quality	17 mg/kg	Annual	Composite	
Molybdenum Dry Wt	Ceiling	75 mg/kg	Annual	Composite	
Nickel Dry Wt	Ceiling	420 mg/kg	Annual	Composite	
Nickel Dry Wt	High Quality	420 mg/kg	Annual	Composite	
Selenium Dry Wt	Ceiling	100 mg/kg	Annual	Composite	
Selenium Dry Wt	High Quality	100 mg/kg	Annual	Composite	
Zinc Dry Wt	Ceiling	7,500 mg/kg	Annual	Composite	
Zinc Dry Wt	High Quality	2,800 mg/kg	Annual	Composite	
Nitrogen, Total Kjeldahl		Percent	Per Application	Composite	
Nitrogen, Ammonium (NH ₄ -N) Total		Percent	Per Application	Composite	
Phosphorus, Total		Percent	Per Application	Composite	
Phosphorus, Water Extractable		% of Tot P	Per Application	Composite	
Potassium, Total Recoverable		Percent	Per Application	Composite	
PFOA + PFOS		ug/kg	Annual	Calculated	Report the sum of PFOA and PFOS. See PFAS Permit Sections for more information.
PFAS Dry Wt			Annual	Grab	Perfluoroalkyl and Polyfluoroalkyl Substances based on updated DNR PFAS List. See PFAS Permit Sections for more information.

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Radium 226 Dry Wt		pCi/g	Annual	Composite	

Changes from Previous Permit:

Sludge limitations and monitoring requirements were evaluated for this permit term and the following changes were made from the previous permit: 1) PFAS monitoring was added annually pursuant to s. NR 204.06(2)(b)9., Wis. Adm. Code, and 2) radium 226 monitoring was added annually because the LaFarge Waterworks had a hit of radium 226 in the drinking water of 2.5 pCi/g on 03/25/2020, 3) PCB monitoring was removed, 3) language was added clarifying that List 2 nutrient monitoring is only required if the cake sludge is land applied.

Explanation of Limits and Monitoring Requirements

Requirements for disposal, including land application of municipal sludge, are determined in accordance with ch. NR 204, Wis. Adm. Code. Ceiling and high-quality limits for metals in sludge are specified in s. NR 204.07(5). Requirements for pathogens are specified in s. NR 204.07(6) and in s. NR 204.07 (7) for vector attraction requirements. Radium requirements are addressed in s. NR 204.07(3)(n).

PFAS- The presence and fate of PFAS in municipal and industrial sludges is an emerging public health concern. EPA is currently developing a risk assessment to determine future land application rates and expects to release this risk assessment by the end of 2024. In the interim, the department has developed the “Interim Strategy for Land Application of Biosolids and Industrial Sludges Containing PFAS.”

Collecting sludge data on PFAS concentrations from a wide range of wastewater treatment facilities will help protect public health from exposure to elevated levels of PFAS and determine the department’s implementation of EPA’s recommendations. To quantitate this risk, PFAS sampling has been included in this WPDES permit pursuant to ss. NR 214.18(5)(b) and NR 204.06(2)(b)9., Wis. Adm. Code.

4 Schedules

4.1 Annual Water Quality Trading (WQT) Report

Required Action	Due Date
Annual WQT Report: Submit an annual WQT report that shall cover the first year of the permit term. The WQT Report shall include: The number of pollutant reduction credits (lbs/month) used each month of the previous year to demonstrate compliance; The source of each month’s pollutant reduction credits by identifying the approved water quality trading plan that details the source; A summary of the annual inspection of each nonpoint source management practice that generated any of the pollutant reduction credits used during the previous year; and Identification of noncompliance or failure to implement any terms or conditions of this permit with respect to water quality trading that have not been reported in discharge monitoring reports.	01/31/2026
Annual WQT Report #2: Submit an annual WQT report that shall cover the previous year.	01/31/2027

Annual WQT Report #3: Submit an annual WQT report that shall cover the previous year.	01/31/2028
Annual WQT Report #4: Submit an annual WQT report that shall cover the previous year.	01/31/2029
Annual WQT Report #5: Submit the 5th annual WQT report. If the permittee wishes to continue to comply with phosphorus limits through WQT in subsequent permit terms, the permittee shall submit a revised WQT plan including a demonstration of credit need, compliance record of the existing WQT, and any additional practices needed to maintain compliance over time.	01/31/2030
Annual WQT Report Required After Permit Expiration: In the event that this permit is not reissued by the expiration date, the permittee shall continue to submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.	

Explanation of Annual WQT Plan Report Schedule: The permittee shall submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.

Other Comments

Publishing Newspaper: La Farge Episcopo, 202 E. Main St., La Farge, WI 54639

Attachments

- Water Quality Based Effluent Limits: May 1, 2023 memo from Ben Hartenbower to Angela Parkhurst titled “Water Quality-Based Effluent Limitations for the La Farge Wastewater Treatment Facility WPDES Permit No. WI-0024465”
- Water Quality Trading Plan, WQT-2025-0010
- Water Quality Trading Conditional Credit Certification letter dated April 29, 2025 from Jenna Monahan to Frank Quinn, Village President

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance

Prepared By: Holly Heldstab, Wastewater Specialist

Date: July 28, 2025

CORRESPONDENCE/MEMORANDUM

State of Wisconsin

DATE: May 1, 2023

TO: Angela Parkhurst– WCR/Eau Claire

FROM: Benjamin Hartenbower – WCR/Eau Claire

SUBJECT: Water Quality-Based Effluent Limitations for the La Farge Wastewater Treatment Facility
WPDES Permit No. WI-0024465

This is in response to your request for an evaluation of the need for water quality-based effluent limitations (WQBELs) using chapters NR 102, 104, 105, 106, 207, 210, 212, and 217 of the Wisconsin Administrative Code (where applicable), for the discharge from the La Farge Wastewater Treatment Facility in Vernon County. This municipal wastewater treatment facility (WWTF) discharges to the Kickapoo River, located in the Middle Kickapoo River in the Lower Wisconsin River Basin. The evaluation of the permit recommendations is discussed in more detail in the attached report.

Based on our review, the following recommendations are made on a chemical-specific basis at Outfall 001:

Parameter	Daily Maximum	Daily Minimum	Weekly Average	Monthly Average	Six-Month Average	Footnotes
Flow Rate						1,2
BOD ₅			45 mg/L	30 mg/L		1
TSS			45 mg/L	30 mg/L		1
pH	9.0 s.u.	6.0 s.u.				1
Bacteria						
Interim Limit Fecal Coliform				400#/100 mL geometric mean		4
Final Limit E. Coli				126#/100 mL geometric mean		
Residual Chlorine	38 µg/L		38 µg/L	38 µg/L		3
Phosphorus MCL WQT Computed (TP)				1.0 mg/L 0.300 mg/L	0.100 mg/L 0.14 lbs/day	5
TKN, Nitrate+Nitrite, and Total Nitrogen						6
Acute WET						7

Footnotes:

1. No changes from the current permit.
2. Monitoring only.
3. Additional limits to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7), Wis. Adm. Codes, are included in bold.
4. Bacteria limits apply during the disinfection season of May through September. The fecal coliform interim limit will apply until the end of the compliance schedule when *E. coli* limits take effect. Additional final limit: No more than 10 percent of *E. coli* bacteria samples collected in any calendar month may exceed 410 count/100 mL.
5. WQT computed compliance limits also require corresponding Minimum Control Levels (MCL) that are to be met at the discharge.

6. As recommended in the Department's October 1, 2019 Guidance for Total Nitrogen Monitoring in Wastewater Permits, annual total nitrogen monitoring is recommended for all minor municipal permittees. Total Nitrogen is the sum of nitrate (NO₃), nitrite (NO₂), and total kjeldahl nitrogen (TKN) (all expressed as N).
7. Two acute WET tests are recommended in the reissued permit. Sampling WET concurrently with any chemical-specific toxic substances is recommended. Tests should be done in rotating quarters, to collect seasonal information about this discharge and should continue after the permit expiration date (until the permit is reissued).

Please consult the attached report for details regarding the above recommendations. If there are any questions or comments, please contact Benjamin Hartenbower at (715) 225-4705 or Benjamin.Hartenbower@wisconsin.gov or Diane Figiel at Diane.Figiel@wisconsin.gov.

Attachments (2) – Narrative & Map

PREPARED BY:



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Water Quality-Based Effluent Limitations for La Farge Wastewater Treatment Facility

WPDES Permit No. WI-0024465

Prepared by: Benjamin P. Hartenbower

PART 1 – BACKGROUND INFORMATION

Facility Description:

The La Farge Wastewater Treatment Plant is an activated sludge system consisting of fine screening, grit removal, aeration tanks, final clarifier, and seasonal chlorine disinfection. The discharge is to the north bank of the Kickapoo River, 300 ft west of Hwy 131 south bridge.

Attachment #2 is a map of the area showing the approximate location of Outfall 001.

Existing Permit Limitations: The current permit, expiring on September 30, 2023, includes the following effluent limitations and monitoring requirements.

Parameter	Daily Maximum	Daily Minimum	Weekly Average	Monthly Average	Six-Month Average	Footnotes
Flow Rate						2
BOD ₅			45 mg/L	30 mg/L		1
TSS			45 mg/L	30 mg/L		1
pH	9.0 s.u.	6.0 s.u.				1
Fecal Coliform May - September			656#/100 mL geometric mean	400#/100 mL geometric mean		3
Residual Chlorine	38 µg/L		38 µg/L	38 µg/L		3
Phosphorus LCA Interim Limit HAC Interim Limit				2.0 mg/L 1.0 mg/L		4
Acute WET						5

Footnotes:

- These limitations are not being evaluated as part of this review. Because the water quality criteria (WQC), reference effluent flow rates, and receiving water characteristics have not changed, limitations for these water quality characteristics do not need to be re-evaluated at this time.
- Monitoring only
- Additional limits to comply with the expression of limits requirements in ss. NR 106.07 and NR 205.065(7), Wis. Adm. Codes, are included in bold.
- Under the phosphorus MDV, a level currently achievable (LCA) interim limit of 2 was effective upon permit reissuance. The highest attainable condition (HAC) limit of 1 was effective October 1, 2022.
- Acute WET testing required: Jan - March 2020 and July - Sept 2022

Receiving Water Information

- Name: The Kickapoo River
- Waterbody Identification Code (WBIC): 1182400
- Classification used in accordance with chs. NR 102 and 104, Wis. Adm. Code: Warm Water Sport Fish (WWSF) community, non-public water supply.
Low flows used in accordance with chs. NR 106 and 217, Wis. Adm. Code: The following 7-Q₁₀ and 7-Q₂ values are from USGS for Station 05408000 in the Kickapoo River, where Outfall 001 is located.
7-Q₁₀ = 63.0 cfs (cubic feet per second)
7-Q₂ = 77.0 cfs
Harmonic Mean Flow = 130 cfs
- Hardness = 261 mg/L as CaCO₃. This value represents the geometric mean of 22 samples collected in the Kickapoo River at Bridge Street from 06/18/2001 to 03/11/2003.
- % of low flow used to calculate limits in accordance with s. NR 106.06(4)(c)5., Wis. Adm. Code: 25%
- Source of background concentration data: Metals data from the Kickapoo River at Oil City is used for this evaluation. The numerical values are shown in the tables below. If no data is available, the background concentration is assumed to be negligible and a value of zero is used in the computations. Background data for calculating effluent limitations for ammonia nitrogen are described later.
- Multiple dischargers: There are several other dischargers to the Kickapoo River however they are not in the immediate vicinity and the mixing zones do not overlap. Therefore, the other dischargers do not impact this evaluation.
- Impaired water status: The Kickapoo River is listed as impaired for Total Phosphorus.

Effluent Information:

- Design Flow Rates(s):
Annual Average = 0.172 MGD (Million Gallons per Day)
For reference, the actual average flow from November 2018 to February 2023 was 0.124 MGD.
- Hardness = 228 mg/L as CaCO₃. This value represents the geometric mean of 4 effluent samples collected from 12/09/2022 to 12/20/2022.
- Acute dilution factor used in accordance with s. NR 106.06 (3) (c), Wis. Adm. Code: Not applicable – this facility does not have an approved Zone of Initial Dilution (ZID).
- Water Source: Domestic wastewater with water supply from wells
- Additives: Chlorine and Sodium Bisulfite
- Effluent characterization: This facility is categorized as a minor municipality, so the permit application required effluent sample analyses for a limited number of common pollutants, as specified in s. NR 200.065, Table 1, Wis. Adm. Code, primarily metal substances plus Ammonia, Chloride, and hardness. The permit-required monitoring for Chlorine and Phosphorus from November 2018 to February 2023 is used in this evaluation.

Chemical Specific Effluent Data at Outfall 001

Sample Date	Copper µg/L	Sample Date	Chloride mg/L
11/15/2022	<5.2	12/09/2022	140
11/18/2022	<5.2	12/13/2022	170
11/22/2022	<5.2	12/16/2022	110
11/25/2022	<5.2	12/20/2022	140
11/29/2022	<5.2		
12/02/2022	<5.2		
12/06/2022	5.6		
12/09/2022	5.5		
12/13/2022	<5.2		
12/16/2022	5.6		
12/20/2022	5.2		
mean	2.0	mean	140

“<” means that the pollutant was not detected at the indicated level of detection. The mean concentration was calculated using zero in place of the non-detected results.

The following table presents the average concentrations and loadings at Outfall 001 from November 2018 to February 2023 for all parameters with limits in the current permit to meet the requirements of s. NR 201.03(6):

Averages of Parameters with Limits

	Average Measurement
BOD ₅	1.3 mg/L*
TSS	2.0 mg/L*
pH field	7.04 s.u.
Phosphorus	0.37 mg/L
Fecal Coliform	605 #/100 mL
Residual Chlorine	<100 µg/L

*Results below the level of detection (LOD) were included as zeroes in calculation of average.

Effluent data for substances for which a single sample was analyzed is shown in the tables in Part 2 below, in the column titled “MEAN EFFL. CONC.”.

**PART 2 – WATER QUALITY-BASED EFFLUENT LIMITATIONS
FOR TOXIC SUBSTANCES – EXCEPT AMMONIA NITROGEN**

Permit limits for toxic substances are required whenever any of the following occur:

1. The maximum effluent concentration exceeds the calculated limit (s. NR 106.05(3), Wis. Adm. Code)
2. If 11 or more detected results are available in the effluent, the upper 99th percentile (or P₉₉) value exceeds the comparable calculated limit (s. NR 106.05(4), Wis. Adm. Code)
3. If fewer than 11 detected results are available, the mean effluent concentration exceeds 1/5 of the calculated limit (s. NR 106.05(6), Wis. Adm. Code)

Acute Limits based on 1-Q₁₀

Daily maximum effluent limitations for toxic substances are based on the acute toxicity criteria (ATC), listed in ch. NR 105, Wis. Adm. Code. Previously daily maximum limits for toxic substances were calculated as two times the ATC. However, changes to ch. NR 106, Wis. Code, (September 1, 2016) require the Department to calculate acute limitations using the same mass balance equation as used for other limits along with the 1-Q₁₀ receiving water low flow to determine if more restrictive effluent limitations are needed to protect the receiving stream from discharges which may cause or contribute to an exceedance of the acute water quality standards. The mass balance equation is provided below.

$$\text{Limitation} = \frac{(\text{WQC}) (Q_s + (1-f) Q_e) - (Q_s - f Q_e) (C_s)}{Q_e}$$

Where:

WQC = Acute toxicity criterion or secondary acute value according to ch. NR 105, Wis. Adm. Code.

Q_s = average minimum 1-day flow which occurs once in 10 years (1-day Q₁₀)
if the 1-day Q₁₀ flow data is not available = 80% of the average minimum 7-day flow which occurs once in 10 years (7-day Q₁₀).

Q_e = Effluent flow (in units of volume per unit time) as specified in s. NR 106.06(4)(d), Wis. Adm. Code.

f = Fraction of the effluent flow that is withdrawn from the receiving water, and

C_s = Background concentration of the substance (in units of mass per unit volume) as specified in s. NR 106.06(4)(e), Wis. Adm. Code.

If the receiving water is effluent dominated under low stream flow conditions, the 1-Q₁₀ method of limit calculation produces the most stringent daily maximum limitations and should be used while making reasonable potential determinations. This is not the case for the La Farge Wastewater Treatment Facility and the limits are set based on two times the acute toxicity criteria.

The following tables list the calculated WQBELs for this discharge along with the results of effluent sampling. All concentrations are expressed in terms of micrograms per Liter (µg/L), except for hardness and chloride (mg/L).

Daily Maximum Limits based on Acute Toxicity Criteria (ATC)

RECEIVING WATER FLOW = 50.4 cfs, (1-Q₁₀ (estimated as 80% of 7-Q₁₀)), as specified in s. NR 106.06 (3) (bm), Wis. Adm. Code.

SUBSTANCE	REF. HARD. mg/L	ATC	MEAN BACK- GRD.	MAX. EFFL. LIMIT**	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.	1-day P ₉₉	1-day MAX. CONC.
Chlorine		19.0		38.1	7.6	<100		
Arsenic		340		680	136	<7.7		
Cadmium	228	26.5	0.025	53.0	10.6	<0.41		
Chromium	228	3537	0.836	7073	1415	<1.1		
Copper	228	33.7	1.093	67.4	13.5	2.0		5.6
Lead	228	237	0.950	473	95	<1.4		
Nickel	228	941		1882	376	<1.5		
Zinc	228	247	2.935	494	99	14		
Chloride (mg/L)		757		1514	303	140		170

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* * The 2 × ATC method of limit calculation yields a more restrictive limit than consideration of ambient concentrations and 1-Q₁₀ flow rates per the changes to s. NR 106.07(3), Wis. Adm. Code, effective 09/01/2016.

Weekly Average Limits based on Chronic Toxicity Criteria (CTC)

RECEIVING WATER FLOW = 15.8 cfs (¼ of the 7-Q₁₀), as specified in s. NR 106.06 (4) (c), Wis. Adm. Code

SUBSTANCE	REF. HARD.* mg/L	CTC	MEAN BACK- GRD.	WEEKLY AVE. LIMIT	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.	4-day P ₉₉
Chlorine		7.3		438.1	87.6	<100	
Arsenic		152		9160	1832	<7.7	
Cadmium	175	3.8	0.025	228.4	45.7	<0.41	
Chromium	261	290	0.836	17406	3481	<1.1	
Copper	261	23.5	1.093	1352.0	270.4	2.0	
Lead	261	71	0.950	4206	841	<1.4	
Nickel	261	117.6		7077.3	1415.5	<1.5	
Zinc	261	279	2.935	16602	3320	14	
Chloride (mg/L)		395		23772	4754	140	

* The indicated hardness may differ from the receiving water hardness because the receiving water hardness exceeded the maximum range in ch. NR 105, Wis. Adm. Code, over which the chronic criteria are applicable. In that case, the maximum of the range is used to calculate the criterion.

Monthly Average Limits based on Wildlife Criteria (WC)

The effluent characterization did not include any effluent sampling results for substances for which Wildlife Criteria exist.

Monthly Average Limits based on Human Threshold Criteria (HTC)

RECEIVING WATER FLOW = 32.5 cfs (¼ of Harmonic Mean), as specified in s. NR 106.06 (4), Wis. Adm. Code.

SUBSTANCE	HTC	MEAN BACK- GRD.	MO'LY AVE. LIMIT	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.	30-day P ₉₉
Cadmium	370	0.025	45552	9110	<0.41	
Chromium	3818000	0.836	470074500	94014900	<1.1	
Lead	140	0.950	17121	3424	<1.4	
Nickel	43000		5294188	1058838	<1.5	

Monthly Average Limits based on Human Cancer Criteria (HCC)

RECEIVING WATER FLOW = 32.5 cfs (¼ of Harmonic Mean), as specified in s. NR 106.06 (4), Wis. Adm. Code.

SUBSTANCE	HCC	MEAN BACK- GRD.	MO'LY AVE. LIMIT	1/5 OF EFFL. LIMIT	MEAN EFFL. CONC.
Arsenic	13.3		1638	328	<7.7

In addition to evaluating the need for limits for each individual substance for which HCC exist, s. NR 106.06(8), Wis. Adm. Code, requires the evaluation of the cumulative cancer risk. Because no effluent limits are needed based on HCC, determination of the cumulative cancer risk is not needed per s. NR 106.06(8), Wis. Adm. Code.

Conclusions and Recommendations: Based on a comparison of the effluent data and calculated effluent limitations, limits are not required for toxic substances.

Total Residual Chlorine – Because chlorine is added as a disinfectant, effluent limitations are recommended to assure proper operation of the de-chlorination system. Section NR 210.06(2)(b), Wis. Adm. Code, states, “When chlorine is used for disinfection, the daily maximum total residual chlorine concentration of the discharge may not exceed 0.10 mg/L.” Because the WQBELs are more restrictive, they are recommended instead. Specifically, a daily maximum limit of 38 µg/L (38.06, rounded to two significant figures) is required. Due to revisions to s. NR 106.07(2), Wis. Adm. Code, mass limitations are no longer required.

Weekly average limitations are not needed based on reasonable potential as the daily maximum limitations will provide adequate protection of the resource; however, ss. NR 106.07(3) and NR 205.067(7), Wis. Adm. Code, require WPDES permits contain weekly average and monthly average limitations for municipal dischargers whenever practicable and necessary to protect water quality.

Therefore, weekly average and monthly average limits of 38 µg/L are required to meet expression of limits requirements in addition to the daily max limit.

Mercury – The permit application did not require monitoring for mercury because the La Farge Wastewater Treatment Facility is categorized as a minor facility as defined in s. NR 200.02(8), Wis. Adm. Code. In accordance with s. NR 106.145(3)(a)3., Wis. Adm. Code, a minor municipal discharger shall monitor, and report results of influent and effluent mercury monitoring once every three months if, there are two or more exceedances in the last five years of the high-quality sludge mercury concentration of 17 mg/kg specified in s. NR 204.07(5). A review of the past five years of sludge characteristics data reveals that all the sample results are within expected analytical ranges and well below the 17 mg/kg level. The average concentration in the sludge from 2019 to 2022 was 0.36 mg/kg, with a maximum reported concentration of 0.44 mg/kg. Therefore, no mercury monitoring is recommended at Outfall 001.

PFOS and PFOA – The need for PFOS and PFOA monitoring is evaluated in accordance with s. NR 106.98, Wis. Adm. Code. Based on the annual design flow and lack of nondomestic contributions, it is unlikely that the effluent will contain PFOS or PFOA. **Therefore, monitoring is not recommended.** If information becomes available that indicates PFOS or PFOA may be present in the effluent or source water, the monitoring requirements may change.

PART 3 – WATER QUALITY-BASED EFFLUENT LIMITATIONS FOR AMMONIA NITROGEN

The State of Wisconsin promulgated revised water quality standards for ammonia nitrogen in ch. NR 105, Wis. Adm. Code, effective March 1, 2004 which includes criteria based on both acute and chronic toxicity to aquatic life. Given the fact that the La Farge Wastewater Treatment Facility does not currently have ammonia nitrogen limits, the need for limits is evaluated at this time.

Daily Maximum Limits based on Acute Toxicity Criteria (ATC):

Daily maximum limitations are based on acute toxicity criteria in ch. NR 105, Wis. Adm. Code, which are a function of the effluent pH and the receiving water classification. The acute toxicity criterion (ATC) for ammonia is calculated using the following equation.

$$\text{ATC in mg/L} = [A \div (1 + 10^{(7.204 - \text{pH})})] + [B \div (1 + 10^{(\text{pH} - 7.204)})]$$

Where:

A = 0.411 and B = 58.4 for a Warm Water Sport fishery, and
pH (s.u.) = that characteristic of the effluent.

The effluent pH data was examined as part of this evaluation. A total of 1581 sample results were reported from November 2018 to February 2023. The maximum reported value was 7.20 s.u. (Standard pH Units). The effluent pH was 7.20 s.u. or less 99% of the time. The 1-day P₉₉, calculated in accordance with s. NR 106.05(5), Wis. Adm. Code, is 7.25 s.u. The mean plus the standard deviation multiplied by a factor of 2.33, an estimate of the upper ninety ninth percentile for a normally distributed dataset, is 7.25 s.u. Therefore, a value of 7.25 s.u. is believed to represent the maximum reasonably expected pH, and therefore most appropriate for determining daily maximum limitations for ammonia nitrogen. Substituting a value of 7.25 s.u. into the equation above yields an ATC = 27.87 mg/L.

Daily Maximum Ammonia Nitrogen Effluent Limitations Calculation Method

In accordance with s. NR 106.32(2), Wis. Adm. Code daily maximum ammonia limitations are calculated using the the 1-Q₁₀ receiving water low flow if it is determined that the previous method of acute ammonia limit calculation (2×ATC) is not sufficiently protective of the fish and aquatic life. The more restrictive calculated limits shall apply.

The calculated daily maximum ammonia nitrogen effluent limits using the mass balance approach with the 1-Q₁₀ (estimated as 80 % of 7-Q₁₀) and the 2×ATC approach are shown below.

Daily Maximum Ammonia Nitrogen Determination

	Ammonia Nitrogen Limit mg/L
2×ATC	55.74
1-Q ₁₀	5295

The 2×ATC method yields the most stringent limits for the La Farge Wastewater Treatment Facility.

Presented below is a table of daily maximum limitations corresponding to various effluent pH values. Use of this table is not necessarily recommended in the permit, but it is presented herein for informational purposes.

Daily Maximum Ammonia Nitrogen Limits – WWSF

Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L	Effluent pH s.u.	Limit mg/L
6.0 ≤ pH ≤ 6.1	108	7.0 < pH ≤ 7.1	66	8.0 < pH ≤ 8.1	14
6.1 < pH ≤ 6.2	106	7.1 < pH ≤ 7.2	59	8.1 < pH ≤ 8.2	11
6.2 < pH ≤ 6.3	104	7.2 < pH ≤ 7.3	52	8.2 < pH ≤ 8.3	9.4
6.3 < pH ≤ 6.4	101	7.3 < pH ≤ 7.4	46	8.3 < pH ≤ 8.4	7.8
6.4 < pH ≤ 6.5	98	7.4 < pH ≤ 7.5	40	8.4 < pH ≤ 8.5	6.4
6.5 < pH ≤ 6.6	94	7.5 < pH ≤ 7.6	34	8.5 < pH ≤ 8.6	5.3
6.6 < pH ≤ 6.7	89	7.6 < pH ≤ 7.7	29	8.6 < pH ≤ 8.7	4.4
6.7 < pH ≤ 6.8	84	7.7 < pH ≤ 7.8	24	8.7 < pH ≤ 8.8	3.7
6.8 < pH ≤ 6.9	78	7.8 < pH ≤ 7.9	20	8.8 < pH ≤ 8.9	3.1
6.9 < pH ≤ 7.0	72	7.9 < pH ≤ 8.0	17	8.9 < pH ≤ 9.0	2.6

Weekly and Monthly Average Limits based on Chronic Toxicity Criteria (CTC)

The ammonia limit calculation also warrants evaluation of weekly and monthly average limits based on chronic toxicity criteria for ammonia, since those limits relate to the assimilative capacity of the receiving water.

Weekly average and monthly average limits for ammonia nitrogen are based on chronic toxicity criteria in ch. NR 105, Wis. Adm. Code.

The 30-day chronic toxicity criterion (CTC) for ammonia in waters classified as a Warm Water Sport Fish Community is calculated by the following equation, according to subchapter IV of NR 106, Wis. Adm. Code.

$$CTC = E \times \{ [0.0676 \div (1 + 10^{(7.688 - pH)})] + [2.912 \div (1 + 10^{(pH - 7.688)})] \} \times C$$

Where:

pH = the pH (s.u.) of the receiving water,

E = 0.854,

C = the minimum of 2.85 or $1.45 \times 10^{(0.028 \times (25 - T))}$ – (Early Life Stages Present), or

C = $3.73 \times 10^{(0.028 \times (25 - T))}$ – (Early Life Stages Absent), and

T = the temperature (°C) of the receiving water – (Early Life Stages Present), or

T = the maximum of the actual temperature (°C) and 7 – (Early Life Stages Absent)

The 4-day criterion is equal to the 30-day criterion multiplied by 2.5. The 4-day criteria are used in a mass-balance equation with the 7-Q₁₀ (4-Q₃, if available) to derive weekly average limitations. And the 30-day criteria are used with the 30-Q₅ (estimated as 85% of the 7-Q₂ if the 30-Q₅ is not available) to derive monthly average limitations. The stream flow value is further adjusted to temperature; 100% of the flow is used if the Temperature ≥ 16 °C, 25% of the flow is used if the Temperature < 11 °C, and 50% of the flow is used if the Temperature ≥ 11 °C but < 16 °C.

Section NR 106.32 (3), Wis. Adm. Code, provides a mechanism for less stringent weekly average and monthly average effluent limitations when early life stages (ELS) of critical organisms are absent from

Attachment #1

the receiving water. This applies only when the water temperature is less than 14.5 °C, during the winter and spring months. Burbot, an early spawning species, are not believed to be present in the Kickapoo River. So “ELS Absent” criteria apply from October through March, and “ELS Present” criteria will apply from April through September for a WWSF classification.

The “default” basin assumed values are used for Temperature, pH and background ammonia concentrations, because minimum ambient data is available. These values are shown in the table below, with the resulting criteria and effluent limitations.

Weekly and Monthly Ammonia Nitrogen Limits – WWSF

		May-October	November-April
Effluent Flow	Qe (MGD)	0.172	0.172
Background Information	7-Q ₁₀ (cfs)	63.00	63.00
	7-Q ₂ (cfs)	77.00	77.00
	Ammonia (mg/L)	0.060	0.120
	Temperature (°C)	25	7
	pH (s.u.)	8.21	7.97
	% of Flow used	100	25
	Reference Weekly Flow (cfs)	63.00	15.75
	Reference Monthly Flow (cfs)	65.45	16.36
Criteria mg/L	4-day Chronic		
	Early Life Stages Present	2.24	6.35
	Early Life Stages Absent	2.24	10.31
	30-day Chronic		
	Early Life Stages Present	0.90	2.54
	Early Life Stages Absent	0.90	4.12
Effluent Limitations mg/L	Weekly Average		
	Early Life Stages Present	520	380
	Early Life Stages Absent		
	Monthly Average		
	Early Life Stages Present	210	150
	Early Life Stages Absent		

Effluent Data

Four samples for ammonia nitrogen were taken December 2022, and their results were as follows:

Ammonia Nitrogen Effluent Data

Sample Date	Ammonia Nitrogen mg/L
12/09/2022	<0.2
12/13/2022	<0.2
12/16/2022	<0.2
12/20/2022	<0.2

Based on effluent results, there is no reasonable potential for the discharge to exceed any of the calculated ammonia nitrogen limits. **No monitoring is recommended.**

PART 4 – WATER QUALITY-BASED EFFLUENT LIMITATIONS

Attachment #1
FOR BACTERIA

On May 1, 2020, revisions to chs. NR 102 and NR 210, Wis. Adm. Codes, became effective which replace fecal coliform limits with new *Escherichia coli* (*E. coli*) limits for protection of recreational uses. Section NR 210.06(2)(a)1, Wis. Adm. Code, includes two limits which must be included in permits for facilities which are required to disinfect:

1. The geometric mean of *E. coli* bacteria in effluent samples collected in any calendar month may not exceed 126 counts/100 mL.
2. No more than 10 percent of *E. coli* bacteria samples collected in any calendar month may exceed 410 counts/100 mL.

E. coli monitoring is recommended at the same frequency that fecal coliform monitoring is required in the current permit. Because the La Farge Wastewater Treatment Facility permit requires weekly monitoring, the 410 counts/100 mL limit will effectively function as a daily maximum limit unless the facility performs additional monitoring. Any additional monitoring beyond what is required by the permit must also be reported on the DMR as required in the standard requirements section of the permit.

These limits are required during May through September. No changes are recommended the required disinfection season.

Effluent Data

The La Farge Wastewater Treatment Facility has monitored effluent *E. coli* from May 2022 to September 2022 and a total of 20 results are available. A geometric mean of 126 counts/100 mL was exceeded in 2 out of 5 months, with a maximum monthly geometric mean of 2378 counts/100 mL. Effluent data exceeded 410 counts/100 mL 7 times (which is 35% of the total sample results). The maximum reported value was 10000 counts/100 mL. Based on this effluent data it appears that the facility can't meet new *E. coli* limits and a compliance schedule is needed in the reissued permit.

Interim Limit

Available *E. Coli* data indicates that the new limitations are not readily attainable. The permit will include a compliance schedule to meet these limits. During the compliance schedule, an interim limit applies to prevent back-sliding from the current level of disinfection during the compliance schedule period. Therefore, a fecal coliform limit shall be included in the reissued permit as an interim limit of 400 counts/100 mL as a monthly geometric mean.

PART 5 – PHOSPHORUS

Technology-Based Effluent Limit

Subchapter II of Chapter NR 217, Wis. Adm. Code, requires municipal wastewater treatment facilities that discharge greater than 150 pounds of Total Phosphorus per month to comply with a monthly average limit of 1.0 mg/L, or an approved alternative concentration limit.

Because the La Farge Wastewater Treatment Facility does not currently have an existing technology-

based limit, the need for this limit in the reissued permit is evaluated. The data demonstrates that the annual monthly average phosphorus loading is less than 150 lbs/month, which is the threshold for municipalities in accordance to s. NR 217.04(1)(a)1, Wis. Adm. Code, and therefore a technology-based limit is not required.

Annual Average Mass Total Phosphorus Loading

Month	Monthly Avg. mg/L	Total Flow MG/month	Total Phosphorus lb./mo.
Mar 2022	0.37	3.42	10.64
Apr 2022	0.31	3.39	8.73
May 2022	0.37	3.58	11.15
Jun 2022	0.47	3.39	13.34
Jul 2022	0.72	2.97	17.82
Aug 2022	0.36	3.73	11.18
Sep 2022	1.02	3.09	26.35
Oct 2022	0.66	2.43	13.34
Nov 2022	0.34	3.02	8.65
Dec 2022	0.27	2.08	4.59
Jan 2023	0.46	2.29	8.82
Feb 2023	0.37	2.05	6.24
Average =			11.74

Total P (lbs/month) = Monthly average (mg/L) × total flow (MG/month) × 8.34 (lbs/gallon)
Where total flow is the sum of the actual (not design) flow (in MGD) for that month

In addition, the need for a WQBEL for phosphorus must be considered.

Water Quality-Based Effluent Limits (WQBEL)

Revisions to administrative rules regulating phosphorus took effect on December 1, 2010. These rule revisions include additions to s. NR 102.06, Wis. Adm. Code, which establish phosphorus standards for surface waters. Subchapter III of NR 217, Wis. Adm. Code, establishes procedures for determining WQBELs for phosphorus, based on the applicable standards in ch. NR 102, Wis. Adm. Code.

Section NR 102.06(3)(a), Wis. Adm. Code, specifically names river segments for which a phosphorus criterion of 0.100 mg/L applies. For other stream segments that are not specified in s. NR 102.06(3)(a), Wis. Adm. Code, s. NR 102.06(3)(b), Wis. Adm. Code, specifies a phosphorus criterion of 0.075 mg/L. The phosphorus criterion of 0.100 mg/L applies for the Kickapoo River.

The conservation of mass equation is described in s. NR 217.13(2)(a), Wis. Adm. Code, for phosphorus WQBELs and includes variables of water quality criterion (WQC), receiving water flow rate (Qs), effluent flow rate (Qe), and upstream phosphorus concentrations (Cs) provided below.

$$\text{Limitation} = [(WQC)(Q_s + (1-f) Q_e) - (Q_s - f Q_e) (C_s)] / Q_e$$

Where:

Attachment #1

WQC = 0.100 mg/L for the Kickapoo River.

Q_s = 100% of the 7- Q_2 of 77 cfs

C_s = background concentration of phosphorus in the receiving water pursuant to s. NR

217.13(2)(d), Wis. Adm. Code

Q_e = effluent flow rate = 0.172 MGD = 0.266 cfs

f = the fraction of effluent withdrawn from the receiving water = 0

Section NR 217.13(2)(d), Wis. Adm. Code, specifies that the background phosphorus concentration used in the limit calculation formula shall be calculated using the procedures specified in s. NR 102.07(1)(b) to (c), Wis. Adm. Code. The median shall be calculated with at least one year of data using samples collected once per month during the period of May through October. All representative data from the most recent 5 years shall be used, but data from the most recent 10 years may be used if representative of current conditions.

The following data were considered in estimating the background phosphorus concentration:

SWIMS ID	633066
Station Name	Monitoring station at STH 82 at La Farge
Waterbody	Kickapoo River
Sample Count	7
First Sample	05/22/2002
Last Sample	10/15/2002
Mean	0.121 mg/L
Median	0.133 mg/L

Substituting a background concentration above criteria into the limit calculation equation above would result in a calculated limit that is less than the applicable criterion of 0.100 mg/L. However, s. NR 217.13(7), Wis. Adm. Code, specifies that “if the water quality-based effluent limitation calculated pursuant to the procedures in this section is less than the phosphorus criterion specified in s. NR 102.06, Wis. Adm. Code, for the water body, the effluent limit shall be set equal to the criterion.”

The impaired water listing of the Kickapoo River also points towards the notion that effluent phosphorus limits equal to the water quality criterion are needed to prevent the discharge from contributing to further impairment of the receiving water. The Guidance for Implementing Wisconsin’s Phosphorus Water Quality Standards for Point Source Discharges (2020) suggests setting effluent limits equal to the criterion in the absence of an EPA approved total maximum daily load for discharges of phosphorus to phosphorus impaired waters.

Effluent Data

The following table summarizes effluent total phosphorus monitoring data from November 2018 to February 2023.

	Phosphorus mg/L
--	--------------------

Attachment #1

1-day P ₉₉	1.03
4-day P ₉₉	0.66
30-day P ₉₉	0.46
Mean	0.37
Std	0.19
Sample size	661
Range	0.02 - 1.84

Reasonable Potential Determination

Since the 30-day P₉₉ of reported effluent total phosphorus data is greater than the calculated WQBEL, the discharge has reasonable potential to cause or contribute to an exceedance of the water quality criterion. Therefore, a WQBEL is required.

Limit Expression

According to s. NR 217.14 (2), Wis. Adm. Code, because the calculated WQBEL is less than or equal to 0.3 mg/L, the effluent limit of 0.100 mg/L may be expressed as a six-month average. If a concentration limitation expressed as a six-month average is included in the permit, a monthly average concentration limitation of 0.300 mg/L, equal to three times the WQBEL calculated under s. NR 217.13, Wis. Adm. Code shall also be included in the permit. The six-month average should be averaged during the months of May – October and November – April.

Mass Limits

Because the discharge is to a phosphorus impaired water, a mass limit is also required, pursuant to s. NR 217.14(1)(a), Wis. Adm. Code. This final mass limit shall be $0.100 \text{ mg/L} \times 8.34 \times 0.172 \text{ MGD} = 0.14 \text{ lbs/day}$ expressed as a six-month average.

WQT Minimum Control Level (MCL).

A water quality trading plan has been submitted as an alternative compliance option to offset any Total Phosphorus discharged from Outfall 001 that exceeds the WQBELs. The phosphorus WQBELs may be expressed as computed compliance limits, but a Minimum Control Level (MCL) must be set as a limit not to be exceeded at either outfall location. **The existing MDV interim limit of 1.0 mg/L is recommended as the MCL.**

PART 6 – WATER QUALITY-BASED EFFLUENT LIMITATIONS FOR THERMAL

Surface water quality standards for temperature took effect on October 1, 2010. These regulations are detailed in chs. NR 102 (Subchapter II – Water Quality Standards for Temperature) and NR 106 (Subchapter V – Effluent Limitations for Temperature) of the Wisconsin Administrative Code. Daily maximum and weekly average temperature criteria are available for the 12 different months of the year depending on the receiving water classification.

Due to the amount of upstream flow available for dilution in the limit calculation ($Q_s:Q_e > 20:1$), the lowest calculated limitation is 120° F (s. NR 106.55(6)(a), Wis. Adm. Code). For activated sludge

treatment systems of domestic waste, there is no reasonable potential for the discharge to exceed this limit. **Therefore, temperature limits and monitoring are not recommended.**

PART 7 – WHOLE EFFLUENT TOXICITY (WET)

WET testing is used to measure, predict, and control the discharge of toxic materials that may be harmful to aquatic life. In WET tests, organisms are exposed to a series of effluent concentrations for a given time and effects are recorded. Decisions below related to the selection of representative data and the need for WET limits were made according to ss. NR 106.08 and 106.09, Wis. Adm. Code. WET monitoring frequency and toxicity reduction evaluation (TRE) recommendations were made using the best professional judgment of staff familiar with the discharge after consideration of the guidance in the *Whole Effluent Toxicity (WET) Program Guidance Document (2022)*.

- Acute tests predict the concentration that causes lethality of aquatic organisms during a 48 to 96-hour exposure. To assure that a discharge is not acutely toxic to organisms in the receiving water, WET tests must produce a statistically valid LC₅₀ (Lethal Concentration to 50% of the test organisms) greater than 100% effluent, according to s. NR 106.09(2)(b), Wis. Adm Code.
- Chronic testing is usually not recommended where the ratio of the 7-Q₁₀ to the effluent flow exceeds 100:1. For the La Farge Wastewater Treatment Facility, that ratio is approximately 237:1. With this amount of dilution, there is believed to be little potential for chronic toxicity effects in the Kickapoo River associated with the discharge from the La Farge Wastewater Treatment Facility, so the need for chronic WET testing will not be considered further.
- According to the *State of Wisconsin Aquatic Life Toxicity Testing Methods Manual* (s. NR 219.04, Table A, Wis. Adm. Code), a synthetic (standard) laboratory water may be used as the dilution water and primary control in acute WET tests, unless the use of different dilution water is approved by the Department prior to use. The primary control water must be specified in the WPDES permit.
- Shown below is a tabulation of all available WET data for Outfall 001. Efforts are made to ensure that decisions about WET monitoring and limits are made based on representative data, as specified in s. NR 106.08(3), Wis. Adm Code. Data which is not believed to be representative of the discharge was not included in reasonable potential calculations. The table below differentiates between tests used and not used when making WET determinations.

WET Data History

Date Test Initiated	Acute Results LC ₅₀ %				Chronic Results IC ₂₅ %					Footnotes or Comments
	<i>C. dubia</i>	Fathead minnow	Pass or Fail?	Used in RP?	<i>C. dubia</i>	Fathead Minnow	Algae (IC ₅₀)	Pass or Fail?	Use in RP?	
07/21/2004	>100	>100	Pass	No						1
01/29/2020	>100	>100	Pass	Yes						
09/07/2022	>100	>100	Pass	Yes						

Footnotes:

Attachment #1

1. *Data Not Representative.* Significant changes were made to WET test methods in 2004 and these changes were assumed to be fully implemented by certified labs by no later than June 2005.
- According to s. NR 106.08, Wis. Adm. Code, WET reasonable potential is determined by multiplying the highest toxicity value that has been measured in the effluent by a safety factor, to predict the likelihood (95% probability) of toxicity occurring in the effluent above the applicable WET limit. The safety factor used in the equation changes based on the number of toxicity detects in the dataset. The fewer detects present, the higher the safety factor, because there is more uncertainty surrounding the predicted value. **WET limits must be given, according to s. NR 106.08(6), Wis. Adm. Code, whenever the applicable Reasonable Potential equation results in a value greater than 1.0.**

$$\text{Acute Reasonable Potential} = [(\text{TUa effluent}) (B)]$$

According to s. NR 106.08(6)(d), Wis. Adm. Code, TUa and TUC effluent values are equal to zero whenever toxicity is not detected (i.e. when the LC_{50} , IC_{25} or $\text{IC}_{50} \geq 100\%$).

Acute Reasonable Potential = $0 < 1.0$, reasonable potential is not shown, and a limit is not required.

The WET checklist was developed to help DNR staff make recommendations regarding WET limits, monitoring, and other related permit conditions. The checklist indicates whether acute and chronic WET limits are needed, based on requirements specified in s. NR 106.08, Wis. Adm. Code. The checklist steps the user through a series of questions, assesses points based on the potential for effluent toxicity, and suggests monitoring frequencies based on points accumulated during the checklist analysis. As toxicity potential increases, more points accumulate, and more monitoring is recommended to ensure that toxicity is not occurring. A summary of the WET checklist analysis completed for this permittee is shown in the table below. Staff recommendations based on best professional judgment are provided below the summary table. For guidance related to reasonable potential and the WET checklist, see Chapter 1.3 of the WET Guidance Document: <https://dnr.wisconsin.gov/topic/Wastewater/WET.html>.

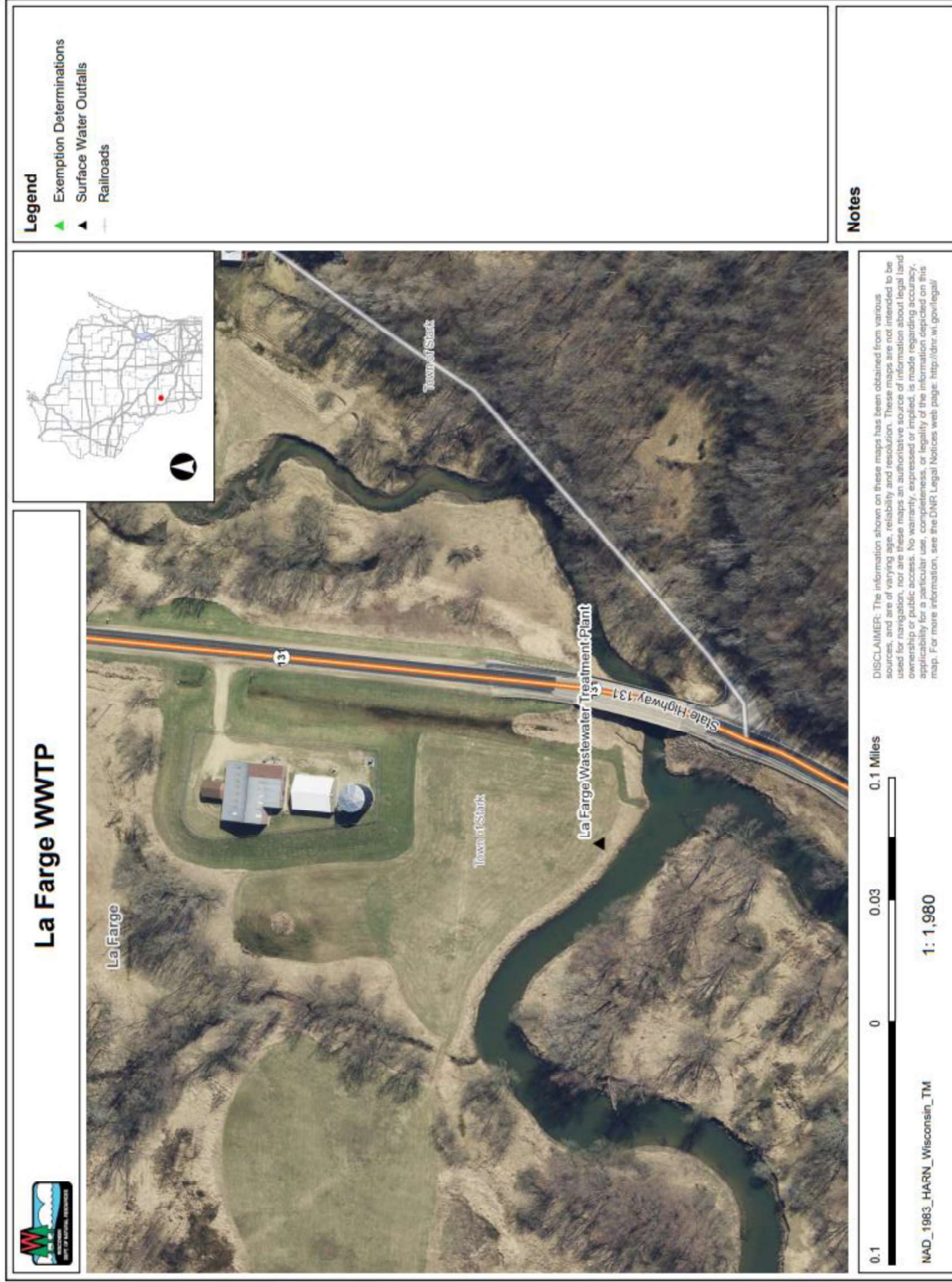
WET Checklist Summary

	Acute
AMZ/IWC	Not Applicable. 0 Points
Historical Data	Two tests used to calculate RP. No tests failed. 0 Points
Effluent Variability	Fecal Coliform Exceedances (5 pts) 5 Points
Receiving Water Classification	WWSF (5 pts) 5 Points
Chemical-Specific Data	Reasonable potential for Chlorine limits based on ATC; (5 pts) Chloride, Copper, and Zinc detected. (3 pts) Additional Compounds of Concern: None 8 Points
Additives	One Biocide (3 pts) and two Water Quality Conditioners added. (2 pt)

Attachment #1

	Acute
	Permittee has proper P chemical SOPs in place 5 Points
Discharge Category	No Industrial Contributors. 0 Points
Wastewater Treatment	Secondary or Better 0 Points
Downstream Impacts	No impacts known (0 pts) 0 Points
Total Checklist Points:	23 Points
Recommended Monitoring Frequency (from Checklist):	2 tests during permit term
Limit Required?	No
TRE Recommended? (from Checklist)	No

- After consideration of the guidance provided in the Department's WET Program Guidance Document (2022) and other information described above, two acute WET tests are recommended in the reissued permit. Tests should be done in rotating quarters to collect seasonal information about this discharge. WET testing should continue after the permit expiration date (until the permit is reissued).



WATER QUALITY TRADING PLAN

Submitted: May 16, 2023

Revised: March 29, 2024

Revised: June 11, 2024

Revised: April 3, 2025



Village of La Farge Wastewater Treatment Facility

WPDES Permit No. WI-0024465-11-0

HWY 131 South

La Farge, Wisconsin 54639

Prepared by:

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Project Number: D22-145

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IV.	Methods for Nonpoint Source Load Reduction.....	7
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Attachments

- 1) Notice of Intent to Conduct Water Quality Trading
- 2) Water Quality Trading Checklist
- 3) Location & Topography Map
- 4) Sanitary Sewer Map
- 5) Wastewater Treatment Facility Flow Schematic
- 6) HUC-12 Watershed Map
- 7) Wetland Map
- 8) Soils Map and Testing Data
- 9) Current State of Eroding Streambanks Documentation
- 10) NRCS Streambank Erosion Estimator Report
- 11) Operation and Maintenance (O&M) Plan
- 12) WQT Plans and Specifications

I. Executive Summary -

This Water Quality Trading Plan summarizes the Village of La Farge's (Village) plan to utilize Water Quality Trading (WQT) for compliance with the final total phosphorus limit as provided in the Wisconsin Pollutant Discharge Elimination System (WPDES) Permit #WI 0024465-11-0. The Wastewater Treatment Facility (WWTF) treated 0.066 MGD with an average effluent Total Phosphorus (TP) concentration of 0.49 mg/L in 2023. The WWTF plans to continue chemical Phosphorus treatment and offset a minimum 78.3 lbs of TP with WQT Credits in order to meet the final annual six-month average limit of 0.100 mg/L and a monthly average limit of 0.300 mg/L, which became effective following DNR reissuance of the WPDES Permit.

NRCS Streambank Erosion modeling methods were used to calculate the total phosphorus credits that would be generated based on the installation of best management practices (BMPs). These credits will be used to demonstrate compliance with the final total phosphorus limit as proposed in the WPDES Permit.

As demonstrated in modeling results from Table 1.1, the WWTF has the ability to register approximately 201 credits. The implementation of this WQT Plan will result in compliance with the final TP limits. The WWTF intends to monitor TP credit usage and intends to perform construction of additional BMPs as needed for future effluent TP to comply with WPDES Permits Limits. A new Water Quality Trading Plan will be submitted at that time for new BMP practices and credit production.

Table 1.1 – Modeling Results

Reach	Lateral Recession Rate (ft/yr.)	Current Phosphorus Loading (lbs./yr.)	Proposed Phosphorus Loading (lbs./yr.)	Proposed Phosphorus Reductions (lbs./yr.)	Trade Ratio	Proposed Phosphorus Credits
1.1 (Left)	0.40	63	0	63	3:1	21.0
1.2 (Left)	0.40	46	0	46	3:1	15.5
1.3 (Left)	0.30	28	0	28	3:1	9.5
1.4 (Left)	0.50	92	0	92	3:1	30.5
1.5 (Left)	0.30	137	0	137	3:1	45.5
2.1 (Left)	0.30	18	0	18	3:1	6.0
2.2 (Left)	0.30	41	0	41	3:1	13.5
3 (Left)	0.50	178	0	178	3:1	59.5
Total						201.0

NOTE:

Trade Ratio = (Delivery + Downstream + Equivalency + Uncertainty-Habitat Adjustment):1

Delivery = 0 (Trading within same HUC-12 Watershed)

Downstream = 0 (For trades upstream of Outfall 001)

Equivalency = 0 (Not necessary of Total Phosphorus)

Uncertainty: *Streambank Stabilization with Habitat Restoration* = 3

II. Background -

The purpose of this Water Quality Trading Plan (Plan) is to describe the Village's use of Water Quality Trading to comply with the total phosphorus limits as provided in the Village's WPDES Permit #WI-0024465-11-0. The Plan was developed following the Notice of Intent to Conduct Water Quality Trading, provided in Attachment #1. The Water Quality Trading Checklist Form 3400-208 is provided in Attachment #2.

The Village of La Farge (Village) is located along Wisconsin State Highway '131' and Wisconsin State Highway '82' in Vernon County in southwest Wisconsin. The Village owns and operates a Wastewater Treatment Facility (WWTF) which serves a population of approximately 730 residents.

The Village is comprised primarily of commercial and residential development. The Village is situated on a flatter plain area located between bluffs and the Kickapoo River with the grade typically sloping between 2% and 10%. The topography of the area is shown in Attachment #3.

The existing sanitary sewer collection consists of approximately 258 sanitary manholes; 800 feet of six-inch (6") sanitary sewer; 27,650 feet of eight-inch (8") sanitary sewer; and 3,080 feet of 10" sanitary sewer. Two (2) lift stations are utilized throughout the system, along with approximately 1,850 feet of six-inch (6") sanitary force main and 975 feet of eight-inch (8") sanitary force main to assist with the delivery of wastewater to the treatment facility. Please refer to Attachment #4 – Sanitary Sewer Map for location of sanitary sewer collection system components.

The Village operates an extended-aeration activated sludge system. Wastewater enters the WWTF by first passing through primary treatment. Primary treatments consist of a fine screen and grit removal. Wastewater then proceeds to the equalization tank followed by the aeration tank. Activated sludge is settled out in the final clarifier. Effluent is chlorinated/dechlorinated seasonally prior to discharge to the Kickapoo River. The Village's WWTF has one (1) receiving water and effluent discharge location, Outfall 001: Kickapoo River (Middle Kickapoo Watershed, LW05 – Lower Wisconsin River Drainage Basin in Vernon County). Activated sludge is either returned to the head of the process for further treatment or wasted to aerobic sludge digester. Sludge is then transferred to the sludge drying beds where sludge is dried and stored prior to land application on DNR-approved sites. The WWTF adds Aluminum Sulfate (Alum) to the aeration tank prior to entering the final clarifier for chemical treatment of Phosphorus. The Alum causes coagulation, flocculation, and settling of TP containing solids within the final clarifier. TP is then ultimately removed with the sludge. The Village of La Farge has conducted its annual operations and maintenance at the WWTF in order maintain current performance levels of the facility and not regress treatment production. The current WWTF treats 0.066 MGD on an annual average with a design flow of 0.172 MGD. Please see Attachment #5 for the WWTF flow schematic.

The monthly average influent and effluent flows and loadings at the WWTF for 2021, 2022, and 2023 are provided in Table 2.1 Table 2.2, and Table 2.3, respectively.

Table 2.1 – 2021 Monthly Averages

Month	Flow	BOD ₅		Suspended Solids		Total Phosphorus		Total Phosphorus
	(MGD)	(mg/L)		(mg/L)		(mg/L)		(lbs./day)
	Effluent	Influent	Effluent	Influent	Effluent	Influent	Effluent	Effluent
Jan. ('21)	0.084	100	2	67	1	-	0.31	0.22
Feb. ('21)	0.081	90	3	63	3	-	0.38	0.26
Mar. ('21)	0.110	65	1	52	2	-	0.27	0.25
Apr. ('21)	0.099	108	1	86	2	-	0.31	0.26
May ('21)	0.094	68	2	56	2	-	0.41	0.32
June ('21)	0.105	51	2	45	2	-	0.50	0.44
July ('21)	0.128	51	2	47	1	-	0.47	0.50
Aug. ('21)	0.225	23	1	29	1	-	0.34	0.64
Sept. ('21)	0.131	60	1	62	1	-	0.40	0.44
Oct. ('21)	0.088	54	1	52	1	-	0.60	0.44
Nov. ('21)	0.078	62	1	54	1	-	0.46	0.30
Dec. ('21)	0.079	77	1	64	1	-	0.38	0.25
Annual Average =	0.109	67	2	56	2	-	0.40	0.36

Table 2.2 – 2022 Monthly Averages

Month	Flow	BOD ₅		Suspended Solids		Total Phosphorus		Total Phosphorus
	(MGD)	(mg/L)		(mg/L)		(mg/L)		(lbs./day)
	Effluent	Influent	Effluent	Influent	Effluent	Influent	Effluent	Effluent
Jan. ('22)	0.074	75	1	52	1	-	0.27	0.17
Feb. ('22)	0.071	95	1	73	2	-	0.28	0.17
Mar. ('22)	0.110	65	1	49	5	-	0.37	0.34
Apr. ('22)	0.113	68	1	49	1	-	0.31	0.29
May ('22)	0.115	66	2	55	2	-	0.37	0.35
June ('22)	0.113	64	2	53	1	-	0.47	0.44
July ('22)	0.096	64	8	47	5	-	0.72	0.58
Aug. ('22)	0.120	50	4	33	1	-	0.36	0.36
Sept. ('22)	0.103	43	4	35	2	-	1.02	0.88
Oct. ('22)	0.079	69	5	57	1	-	0.66	0.43
Nov. ('22)	0.101	68	1	50	1	-	0.34	0.29
Dec. ('22)	0.067	96	1	73	1	-	0.27	0.15
Annual Average =	0.097	69	3	52	2	-	0.45	0.37

Table 2.3 – 2023 Monthly Averages

Month	Flow	BOD ₅		Suspended Solids		Total Phosphorus		Total Phosphorus
	(MGD)	(mg/L)		(mg/L)		(mg/L)		(lbs./day)
	Effluent	Influent	Effluent	Influent	Effluent	Influent	Effluent	Effluent
Jan. ('23)	0.074	79	1	54	3	-	0.46	0.28
Feb. ('23)	0.073	94	1	65	1	-	0.37	0.22
Mar. ('23)	0.125	56	0	44	2	-	0.28	0.30
Apr. ('23)	0.135	39	1	54	2	-	0.27	0.31
May ('23)	0.075	68	2	50	2	-	0.48	0.30
June ('23)	0.041	95	2	59	2	-	0.45	0.15
July ('23)	0.037	117	4	71	1	-	0.98	0.30
Aug. ('23)	0.031	115	0	71	2	-	0.77	0.20
Sept. ('23)	0.036	114	1	75	1	-	0.62	0.18
Oct. ('23)	0.047	92	1	69	3	-	0.33	0.13
Nov. ('23)	0.050	98	4	67	7	-	0.53	0.22
Dec. ('23)	0.066	87	3	58	4	-	0.30	0.17
Annual Average =	0.066	88	2	61	3	-	0.49	0.27

Currently, the Village has an average effluent Total Phosphorus of 0.49 mg/L which is well within the WPDES interim limit of 1.0 mg/L. The Village will continue to investigate options for TP removal at the WWTF. To reduce effluent TP, the Village has made efforts to optimize TP reduction at the WWTF. The Village has also implemented source reduction measures such as investigating potential TP contributors. The Village has checked with the following businesses for Phosphorus contribution and will continue its investigation of Phosphorus contributors:

- | | |
|---------------------------------|--------------------------------|
| 1. Bergum's Food Mart | 13. Mikes Handyman Services |
| 2. A Little Moore then Hair | 14. Walker Door |
| 3. La Farge State Bank | 15. Cowboy David's Bake Shoppe |
| 4. Lawton Memorial Library | 16. Goose Barn |
| 5. Premier Co-Op | 17. Phil and Deb's Town Tap |
| 6. Ewetopia Fiber Mill | 18. Rockton Bar |
| 7. Organic Valley | 19. Twisted Raven Lounge |
| 8. Ron's Towing | 20. La Farge Hardware |
| 9. La Farge Truck Center | 21. Chicken Coop |
| 10. Albright Electric and Solar | 22. Green Apple Inn |
| 11. B&W Concrete Construction | 23. Kickapoo retreat |
| 12. Carps Construction | 24. Bear Creek Cottage Rental |

During the initial evaluation of sanitary dischargers, it was determined that Organic Valley was a major contributor of Phosphorus. The Village contacted the Organic Valley about Phosphorus reduction measures. The Village intends to continue educating sewer users in 2024.

Additionally, the Village has investigated watershed compliance alternatives such as Water Quality Trading (WQT) and Adaptive Management (AM). Stream monitoring in 2009/2010 confirmed that the Kickapoo River was an impaired water due to TP. Background TP concentration monitored from Station #533027 Kickapoo River in Banker Park in Viola demonstrated a rolling median TP concentration of 0.186 mg/L. The median average was well over the applicable Water Quality Standard (WQS) of 0.100 mg/L. Following discussion with the DNR and initial investigation, the Village elected to move forward with WQT. Utilizing the results from PRESTO, the watershed of the WWTF has a nonpoint source ratio of 1:99 at the point of discharge and is considered to be nonpoint-source dominated. Therefore, the Village intends to perform WQT projects upstream of the outfall and within the Village's Hydrological Unit Code – 12 (HUC-12) watersheds #070700060306 and #070700060307 as provided in Attachment #6.

Flow and loading data from 2023 was utilized to determine credits needed. Annual effluent TP was estimated at 98.4 lbs. The final limit would allow annual discharge of 20.1 lbs. The Village would be required to offset at least 68.4 lbs of effluent TP. Calculations for required WQT reductions are provided below.

- 1) The current annual Phosphorus loading discharged at the WWTF is calculated as follows:

Seasonal Average Daily Flow (Q) = 0.066 MGD

Average Phosphorus concentration = 0.49 mg/L

$$0.49 \text{ mg/L} \times 0.066 \text{ MGD} \times 8.34 \times 365 \text{ days/yr.} = 98.4 \text{ lbs./yr.}$$

- 2) The proposed allowable annual Phosphorus mass limit at the WWTF is calculated as follows:

Seasonal Average Daily Flow (Q) = 0.066 MGD

Proposed Seasonal Phosphorus Concentration Limit = 0.100 mg/L

$$0.100 \text{ mg/L} \times 0.066 \text{ MGD} \times 8.34 \times 365 \text{ days/yr.} = 20.1 \text{ lbs./yr.}$$

- 3) Reduction of Total Phosphorus required at WWTF

$$98.4 \text{ lbs./yr.} - 20.1 \text{ lbs./yr.} = 78.3 \text{ lbs./yr.}$$

To generate the required TP credits, the Village intends to perform streambank stabilization. The La Farge intends to generate additional credits as a factor of safety and for future growth.

III. Location and Description of Credit Generation Sites –

The Village discharges to the Kickapoo River (Middle Kickapoo Watershed, LW05 – Lower Wisconsin River Drainage Basin in Vernon County). As mentioned previously, the Village intends to perform WQT projects within the Village's HUC-12 #070700060306 and #070700060307. The Village plans to perform streambank stabilization which will utilize grading and/or riprap to prevent the erosion of sediment from the streambanks. Projects will occur on property owned by the Village of La Farge. Streambank stabilization will not only prevent sediment from entering the stream, but will also prevent phosphorus, nitrogen, and other pollutants from discharging to the Kickapoo River. See Figure 3.1 for additional project location information.

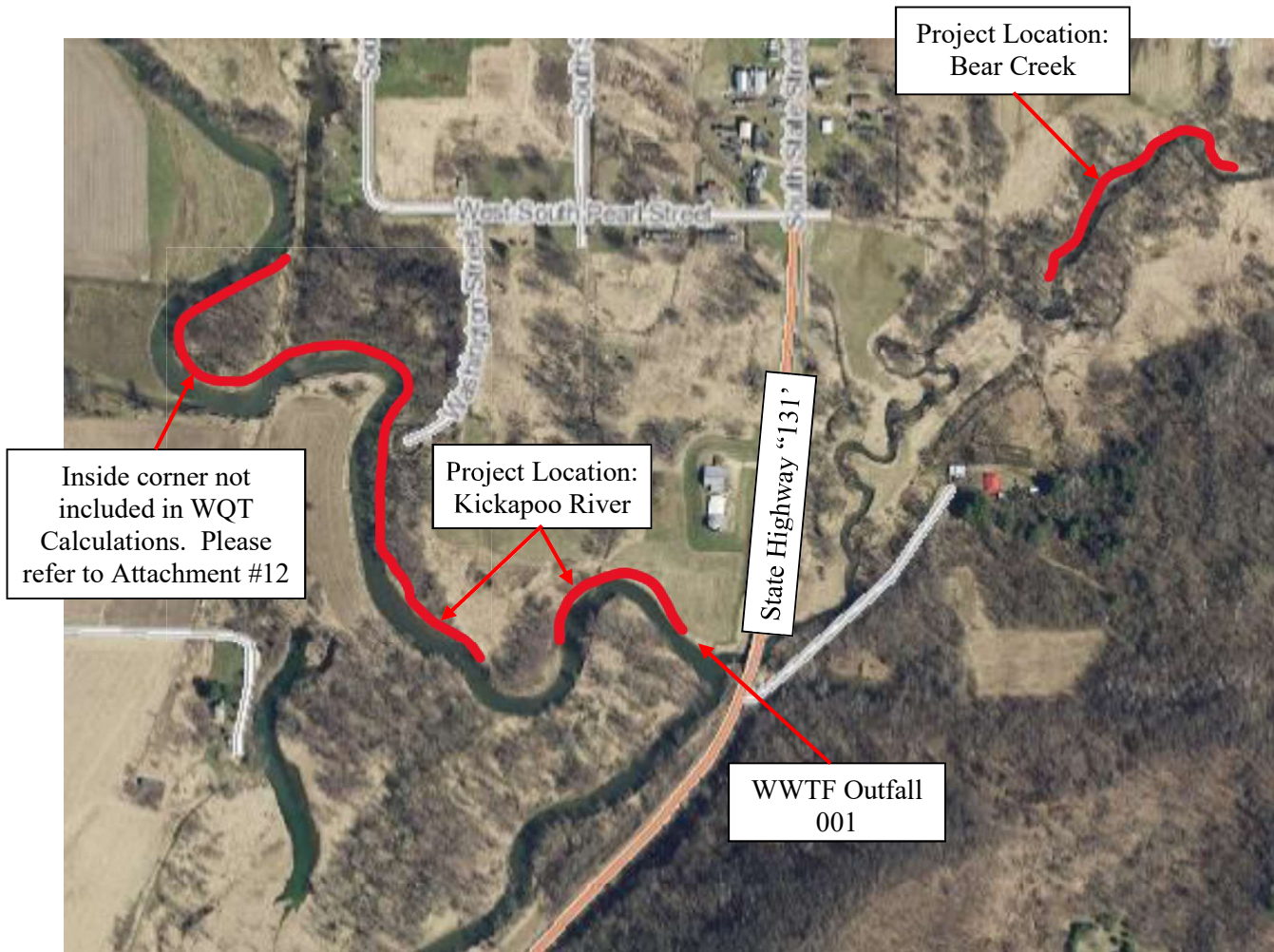


Figure 3.1 – Project location in relation to Outfall 001

IV. Methods for Nonpoint Source Load Reduction –

A. Methods Used to Generate Load Reductions

The Water Quality Trading Plan identifies streambank stabilization practices that will reduce TP runoff from nonpoint sources. The Village has the ability to generate TP load reductions through streambank grading of approximately 2,920 lineal feet of streambank.

Streambank Stabilization will be performed as per NR 328 *Shore Erosion Control Structures in Navigable Waterways* and NRCS 580 *Streambank and Shoreline Protection*. Streambank shaping and riprapping will eliminate the discharge of sediment to the stream. The streambank stabilization project will occur within HUC-12 #070700060306 and #070700060307 in order to generate TP credits. Standard Plans and Specifications for the Project Site will be provided by a Professional Engineer. The Village will also acquire all required permits and authorizations for the Projects.

B. History of Project Site

The Project Site is planned within the Middle Kickapoo River Watershed. The project location is along the Kickapoo River and Bear Creek on property owned by the Village of La Farge. Land use consists of agricultural crop field and undeveloped land. The vegetative cover is a mix of 50% floodplain forest; 35% hay, 10% floodplain grassland, and 5% manicured lawn. The project location consists of undeveloped wetland as indicated in Attachment #7 – Wetland Maps. No fill shall be deposited within the floodplain or wetlands.

The streambanks have experienced significant erosion as the watershed has been cleared for residential and agricultural use. Residential development and agricultural practices caused long term deposition of silt within the floodplain followed by decades of stream morphology eroding a new channel through the deposition.

The Kickapoo River has been included on the Impaired Waters List for Total Phosphorus. Water quality issues caused by sedimentation were included in Wisconsin DNR evaluation for *Kickapoo River Region*. Stream improvements will reduce sediment which was identified as the main reason for habitat degradation in the Kickapoo River. The watershed has also experienced reduction of large woody debris along the streambanks due to agricultural development which reduces available habitat and bank roughness. Stream improvements will also include in-stream habitat improvements.

The banks are bare with slumps, rills and severe vegetative overhang throughout. Severe erosion indicators such as undercuts, slumps, tree roots, and fallen trees are readily visible throughout the site. The erosion indicators demonstrate the lateral recession rate is Severe (0.3-0.5 ft/yr) based on the NRCS Recession Rate Table.

C. Trade Ratio

The Plan identifies trading practices that will reduce TP runoff. However, the DNR requires a trade ratio to provide a safety factor for meeting water quality standards. Trade ratios consider pollutant reductions of varying certainty, location, and type. For the given WQT practice, a trade ratio of 3:1 was calculated. The trade ratio is derived as follows:

Trade Ratio = (Delivery + Downstream + Equivalency + Uncertainty – Habitat Adjustment):1

Delivery = 0 (Trading within same HUC-12 Watershed)

Downstream = 0 (For trades upstream of Outfall 001)

Equivalency = 0 (Not necessary of Total Phosphorus)

Uncertainty: *Streambank Stabilization with Habitat Restoration* = 3

Uncertainty factor was determined from Appendix H – Management Practices and Associated Information of the Wisconsin Department of Natural Resources *Guidance for implementing Water Quality Trading in WPDES Permits (Edition 2)*.

Habitat restoration will consist of bed logs installed approximately every 300 feet within each reach. Bed logs will provide the following habitat benefits:

- Increase roughness within the channel which creates current breaks, shelter, and resting areas for aquatic organisms.
- The log will provide an environment beneficial for algae, macroinvertebrates, and other aquatic organisms that support aquatic food chains.
- Reduce water velocity and ability of the flow to erode and carry sediment.

Table 4.1 - Habitat Restoration Summary

Reach	In-Stream Habitat Structures
1 (Left)	8
2 (Left)	2
3 (Left)	2

D. Model Used to Derive Load Reductions

NRCS Streambank Erosion modeling methods were used to calculate the total phosphorus credits that would be generated based on the installation of BMPs. These credits will be used to demonstrate compliance with the final total phosphorus limit as proposed in the WPDES Permit. Modeling results are provided in Table 4.2. If the Plan or model inputs change during construction, the Village will submit to the DNR the revised models and calculations to more accurately reflect and number of credits generated.

Table 4.2 – Modeling Results

Reach	Lateral Recession Rate (ft/yr.)	Current Phosphorus Loading (lbs./yr.)	Proposed Phosphorus Loading (lbs./yr.)	Proposed Phosphorus Reductions (lbs./yr.)	Trade Ratio	Proposed Phosphorus Credits
1.1 (Left)	0.40	63	0	63	3:1	21.0
1.2 (Left)	0.40	46	0	46	3:1	15.5
1.3 (Left)	0.30	28	0	28	3:1	9.5
1.4 (Left)	0.50	92	0	92	3:1	30.5
1.5 (Left)	0.30	137	0	137	3:1	45.5
2.1 (Left)	0.30	18	0	18	3:1	6.0
2.2 (Left)	0.30	41	0	41	3:1	13.5
3 (Left)	0.50	178	0	178	3:1	59.5
Total						201.0

NOTE:

Trade Ratio = (Delivery + Downstream + Equivalency + Uncertainty-Habitat Adjustment):1

Delivery = 0 (Trading within same HUC-12 Watershed)

Downstream = 0 (For trades upstream of Outfall 001)

Equivalency = 0 (Not necessary of Total Phosphorus)

Uncertainty: *Streambank Stabilization with Habitat Restoration* = 3

Soil testing has been completed to determine TP concentrations within the soil. Soil sampling was performed approximately every 250 feet and included the use of a soil sampler which pulled ¾” cores at 8” depth. Approximately six (6) cores were taken at each sampling location to provide a representative sample. Soils maps and soil testing data is provided in Attachment #8.

Streambank cross sections were surveyed approximately every 100 feet with global position system (GPS) equipment. The site was also surveyed with an aerial drone. The bank height was calculated by using the horizontal distance and vertical difference of GPS survey points located at the water line and the top of eroded area. Bank heights were calculated using the Pythagorean Theorem:

$$c = \sqrt{a^2 + b^2}$$

c = bank height (hypotenuse) (feet)

a = vertical bank (feet)

b = horizontal bank (feet)

Streambank heights were calculated as per guidance for the NRCS Streambank Erosion Estimator. An average height was determined for each reach for input to the NRCS Streambank Erosion Estimator. An onsite evaluation has been conducted to estimate stream bank recession rate. The data, narrative, and photos documenting the current state of eroding stream banks are provided in Attachment #9.

Table 4.3 - Reach Summary

Reach	Length	Number of Cross Sections	Average Vertical Bank	Average Horizontal Bank	Average Bank Height
1.1	450	5	6.68	10.12	12.15
1.2	250	3	7.04	9.73	12.20
1.3	150	3	5.75	14.57	15.68
1.4	400	4	6.58	8.10	10.74
1.5	600	5	5.84	13.24	14.52
2.1	125	2	5.60	13.95	15.04
2.2	375	4	6.00	7.00	9.24
3	571	5	5.38	8.42	10.51

An example of the bank height calculation is provided below:

$$c = \sqrt{a^2 + b^2}$$

c = bank height (hypotenuse) (feet)

a = vertical bank (feet)

b = horizontal bank (feet)

$$a = 105.00' - 100.00' = 5.00'$$

b = 2.50' (horizontal difference from AutoCAD Civil3D)

$$c = \sqrt{5.00^2 + 2.50^2} = 5.59'$$

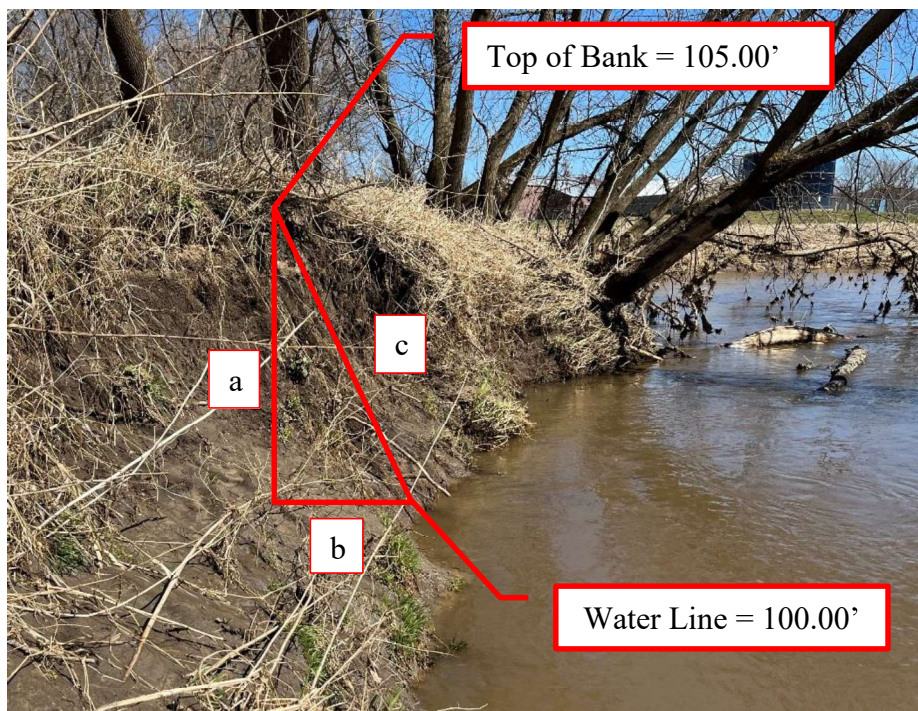


Figure 4.1 – Bank Hight Calculation Example

With the collected data, the NRCS Streambank Erosion Estimator was used to calculate TP loss from each reach of the eroding streambank. The modeling data for the NRCS Streambank Erosion Estimator is available in Attachment #10. The streambank grading and riprap design will eliminate streambank recession thus eliminating TP inputs within the Project areas.

E. Operation and Maintenance

An Operation and Maintenance (O&M) Plan is provided in Attachment #11. The O&M plan describes how the Stream Stabilization Practices will be operated and maintained. The O&M Plan also addresses response procedures for Practice Registration, Noncompliance Notification, and Notification of Trade Agreement Termination.

As previously mentioned, the Village is planning to perform streambank stabilization by implementing BMPs along the Kickapoo River and Bear Creek streambanks. The stabilization practices will be installed and maintained per the Plans and Specifications as provided in Attachment #12. BMPs are to follow NR 328 Shore Erosion Control Structures in Navigable Waterways and NRCS 580 Streambank and Shoreline Protection. Restoration landscaping and seeding will be installed following construction and will be closely monitored for a minimum of two (2) growing seasons to ensure the new seeding grows and erosion is not prevalent. Weeds and invasive vegetation growth will be addressed if present. The riprap will be inspected following heavy rain events at a minimum. Inspection will be used to determine appropriate actions in order to maintain the riprap for continuous and ongoing streambank stabilization and TP credit generation.

The BMPs will be inspected annually by a licensed Professional Engineer to ensure that the BMPs are functioning as intended in order to meet the requirements of this WQT Plan.

V. Trade Timeline –

Schedule for Installation of the above mentioned trading practices for Total Phosphorus Credit Generation for TP compliance is provided in Table 5.1 below.

Table 5.1 – Trade Timeline

Item	Completion Timeline
Site Investigation	Winter 2022
Conceptual Design	Winter 2023
Final Design	Spring 2023
Construction Permits	Spring 2023
DNR Review of Final Design	Spring 2023
Construction of BMPs	Summer/Fall 2023
Phosphorus Credit Registration	Following DNR approval of the WQT Plan
Use of Phosphorus Credits (Ongoing for Permit Compliance)	Following DNR reissuance of the WPDES Permit

Credits will be used by the Village following DNR reissuance of the WPDES Permit. Credits will continue as long as the trading practices are maintained as outlined in this WQT Plan.

VI. Inspection Reporting –

A. Tracking Procedures

The Village will track credits used monthly. The Village will report credit usage to the DNR on a monthly basis in the Discharge Monitoring Reports (DMRs). The annual report will summarize the 12 months of credit usage and credit generation. The Village will report to DNR any concern that they have that may result in a need to modify the trade agreement and/or this trade plan. For example, a need to generate additional credits based on discharge.

B. Inspection

Inspection of the BMPs shall occur during construction phase to ensure they are installed per the design and meet all applicable codes and permits. Once completed, inspections of the established BMPs shall occur each month at a minimum or following heavy rain events. A licensed professional engineer will perform an annual certification to ensure the practice is performing as designed and the Village remains in compliance.

The inspection reports will include:

- i. Name and contact information of the inspector
- ii. Inspection Date
- iii. Relevant standards set forth in the Design Plan or Operation and Maintenance Plan
- iv. Issues identified
- v. When and how any issues identified were addressed
- vi. When and how any issues identified will be addressed in the future

Inspection reports generated during each routine or after rain event inspection will be included with the Annual Water Quality Trading Report submitted by the Village to DNR. Annual inspections by a professional engineer will typically occur in April or May. This time of year is ideal for evaluating the condition of BMPs as it follows the freeze/thaw which poses the greatest potential for changes to the BMPs. Minimal vegetation cover will allow for adequate visual inspection.

C. Management Practice Registration Form

The Village will file a completed registration form 3400-207 for Water Quality Trading Management Practice Registration separately from this Plan.

D. Annual Water Quality Trading Report Submittal

The following shall be submitted to the DNR by January 31 of each year:

- i. The number of pollutant reduction credits (lbs./month) used each month of the previous year to demonstrate compliance;
- ii. A summary of the annual inspection of the practice that generated any of the pollutant reduction credits used during the previous year, this inspection shall be completed by a licensed Professional Engineer;
- iii. All monthly inspection reports;

- iv. Identification of noncompliance or failure to implement any terms or conditions of this permit with respect to water quality trading that have not been reported in discharge monitoring reports;
- v. A list of all noncompliance and the correction measures and timing to address the issues throughout the year; and
- vi. An updated WQT plan if management practices have or will change.

E. Monthly Certification of Management Practices

Each month, the Village will certify that the BMPs are maintained and operating in a manner consistent with this Water Quality Trading Plan or provide a statement noting noncompliance with this Plan. The monthly Discharge Monitoring Report (DMR) will include the following statement as a certification of compliance when the Credit Generating Practice is operating in a manner consistent with the Plan:

“I certify that to the best of my knowledge that the management practices identified in the approved water quality trading plan as the source of phosphorus credits is installed, established and properly maintained.”

F. Notification of Failure to Generate Credits

The Village will notify DNR by telephone call to DNR’s regional wastewater compliance engineer within 24 hours or next business day of becoming aware that phosphorus credits used or intended for use by Village are not being generated as outlined in this Water Quality Trading Plan.

The Village will submit a written notification within five days after the Village recognizes that the phosphorus credits are not being generated as outlined in the Trading Plan. DNR may waive the requirement for submittal for a written notice within five days and instruct the Village to submit the written notice with the next regularly scheduled monitoring report required by Village’s WPDES Permit.

The written notice will contain a description of how and why the TP credits are not being generated as outlined in the Water Quality Trading Plan, the steps taken or planned to prevent reoccurrence of the identified problems and the length of time anticipated it will take to address the issue.

The Village will work to rectify the problem as laid out in the Operation and Maintenance Plans.

G. Conditions under which Management Practices May Be Inspected

Any DNR authorized officer, employee, or representative has the right to access and inspect the credit generating practice so long as the Village’s trade agreement with the property owner(s) and this Water Quality Trading Plan remain in effect.

VII. Certification –

The undersigned hereby certifies that this Water Quality Trading Plan is accurate and correct to the best of his knowledge.

Village of La Farge Wastewater Treatment Facility

By: Wayne Haugrud

Wayne Haugrud
Director of Public Works
Village of La Farge
105 W. Main Street
P.O. Box 37
La Farge, WI 54639
Telephone: (608) 625-2333
Email: waynelaf@mwt.net

Attachment #1

Notice: Pursuant to s. 283.84, Wis. Stats., and ch. NR 217 Wis. Adm. Code, this form must be completed by any WPDES permittee that is using water quality trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Applicant Information

Permittee Name Village of La Farge		Permit Number WI- 0024465-11-0		Facility Site Number	
Facility Address S4459 State HWY 131			City La Farge	State WI	ZIP Code 54639
Project Contact Name (if applicable) Jordan Fure (Delta 3 Eng.)		Address 875 South Chestnut Street		City Platteville	State WI
				ZIP Code 53818	
Project Name Proposed 2022 Stream Improvements - Kickapoo River					
Receiving Water Name Kickapoo River		Parameter(s) being traded Total Phosphorus		HUC 12(s) 070700060307	

Is the permittee in a point or nonpoint source dominated watershed?
(See PRESTO results - <http://dnr.wi.gov/topic/surfacewater/presto.html>)

☐ Point source dominated

☐ Nonpoint source dominated

Credit Generator Information

Credit generator type (select all that apply):

<input type="checkbox"/> Permitted Discharge (non-MS4/CAFO)	<input checked="" type="checkbox"/> Urban nonpoint source discharge
<input type="checkbox"/> Permitted MS4	<input checked="" type="checkbox"/> Agricultural nonpoint source discharge
<input type="checkbox"/> Permitted CAFO	<input type="checkbox"/> Other - Specify: _____

Are any of the credit generators in a different HUC 12 than the applicant? ☐ Yes; HUC 12: _____

☒ No

☐ Unsure

Are any of the credit generators downstream of the applicant?

☒ Yes

☐ No

☐ Unsure

Will a broker/exchange be used to facilitate trade?

☐ Yes; Name: _____

☒ No

☐ Unsure

Point to Point Trades (Traditional Municipal / Industrial Discharge, MS4, CAFO)

Discharge Type	Permit Number	Name	Contact Address	Is the point source credit generator currently in compliance with their permit requirements?
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure

Notice of Intent to Conduct Water Quality Trading

Form 3400-206 (1/14)

Page 0 of 2

Point to Nonpoint Trades (Non-permitted Agricultural, Non-Permitted Urban, etc.)

List the practices that will be used to generate credits:

Streambank Stabilization

Method for quantifying credits generated: ☐ Monitoring

☒ Modeling, Names: NRCS Streambank Erosion Estimator

☐ Other: _____

Projected date credits will be available:

The preparer certifies all of the following:

- I am familiar with the specifications submitted for this application, and I believe all applicable items in this checklist have been addressed.
- I have completed this document to the best of my knowledge and have not excluded pertinent information.

Signature of Preparer

John Fina

Date Signed

11-7-2022

Authorized Representative Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative

Wayne Hauguel

Date Signed

11-8-2022

Attachment #2

Notice: Pursuant to s. 283.84, Wis. Stats., this form must be completed by any WPDES permittee that intends to pursue pollutant trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Applicant Information

Permittee Name Village of La Farge		Permit Number WI- 0024465		Facility Site Number	
Facility Address S4459 STH 133		City La Farge		State WI	ZIP Code 54639
Project Contact Name (if applicable) Jordan Fure (Delta 3 Eng.)		Address 875 South Chestnut Street		City Platteville	State WI
				ZIP Code 53818	
Project Name Proposed 2023 Stream Improvements - Kickapoo River & Bear Creek					
Receiving Water Name Kickapoo River		Parameter(s) being traded Total Phosphorus		HUC 12(s) 070700060306 & 070700060307	

Credit Generator Information

Credit generator type (select all that apply):
☐ Permitted Discharge (non-MS4CAFO) ☐ Urban nonpoint source discharge
☐ Permitted MS4 ☒ Agricultural nonpoint source discharge
☐ Permitted CAFO ☐ Other - Specify: _____

Are any of the credit generators in a different HUC 12 than the applicant? ☐ Yes; HUC 12: _____
☒ No

Are any of the credit generators downstream of the applicant? ☒ Yes
☐ No

Will a broker/exchange be used to facilitate trade? ☐ Yes (include description and contact information in WQT plan)
☒ No

Point to Point Trades (Traditional Municipal / Industrial, MS4, CAFO)

Are each of the point source credit generators identified in this section in compliance with their WDPES permit requirements? ☐ Yes
☐ No

Discharge Type	Permit Number	Name	Contact Information	Trade Agreement Number
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				

Water Quality Trading Checklist

Form 3400-208 (1/14)

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Point to Point Trades (Traditional Municipal / Industrial, MS4, CAFO) cont.

Does plan have a narrative that describes:	Plan Section
a. Summary of discharge and existing treatment including optimization <input type="radio"/> Yes <input type="radio"/> No	
b. Amount of credit being generated <input type="radio"/> Yes <input type="radio"/> No	
c. Timeline for credits and agreements <input type="radio"/> Yes <input type="radio"/> No	
d. Method for quantifying credits <input type="radio"/> Yes <input type="radio"/> No	
e. Tracking and verification procedures <input type="radio"/> Yes <input type="radio"/> No	
f. Location of credit generator in proximity to receiving water and credit user <input type="radio"/> Yes <input type="radio"/> No	
g. Other: <input type="radio"/> Yes <input type="radio"/> No	

Point to Nonpoint Trades (Non-Permitted Urban, Agricultural, Other)

Discharge Type	Practices Used to Generate Credits	Method of Quantification	Trade Agreement Number	Have the practice(s) been formally registered?
<input type="radio"/> Urban NPS <input checked="" type="radio"/> Agricultural NPS <input type="radio"/> Other	Streambank Stabilization	NRCS Streambank Erosion Estimator		<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Only in part

Does plan have a narrative that describes:	Plan Section
a. Description of existing land uses <input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV
b. Management practices used to generate credits <input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV
c. Amount of credit being generated <input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV
d. Description of applicable trade ratio per agreement/management practice <input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV
e. Location where credits will be generated <input checked="" type="radio"/> Yes <input type="radio"/> No	Section III
f. Timeline for credits and agreements <input checked="" type="radio"/> Yes <input type="radio"/> No	Section V
g. Method for quantifying credits <input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV

Water Quality Trading Checklist

Form 3400-208 (1/14)

Page 0 of 3

Does plan have a narrative that describes:		Plan Section
h. Tracking procedures	<input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV
i. Conditions under which the management practices may be inspected	<input checked="" type="radio"/> Yes <input type="radio"/> No	Section VI
j. Reporting requirements should the management practice fail	<input checked="" type="radio"/> Yes <input type="radio"/> No	Section VI
k. Operation and maintenance plan for each management practice	<input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV
l. Location of credit generator in proximity to receiving water and credit user	<input checked="" type="radio"/> Yes <input type="radio"/> No	Section III
m. Practice registration documents, if available	<input type="radio"/> Yes <input checked="" type="radio"/> No	
n. History of project site(s)	<input checked="" type="radio"/> Yes <input type="radio"/> No	Section IV
o. Other: _____	<input type="radio"/> Yes <input type="radio"/> No	

The preparer certifies all of the following:

- I am familiar with the specifications submitted for this application, and I believe all applicable items in this checklist have been addressed.
- I have completed this document to the best of my knowledge and have not excluded pertinent information.
- I certify that the information in this document is true to the best of my knowledge.

Signature of Preparer

Jordan Fine

Date Signed

5-16-2023

Authorized Representative Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative

Wayne Haug

Date Signed

5-16-2023

Attachment #3



Location Map



- Legend**
- Municipality
 - State Boundaries
 - County Boundaries
 - Major Roads
 - Interstate Highway
 - State Highway
 - US Highway
 - County and Local Roads
 - County HWY
 - Local Road
 - Railroads
 - Tribal Lands
 - Index to
 - EN_Image_Basemap_Leaf_
 - Off

Notes

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/legal/>

0.3 0 0.13 0.3 Miles

NAD_1983_HARN_Wisconsin_TM

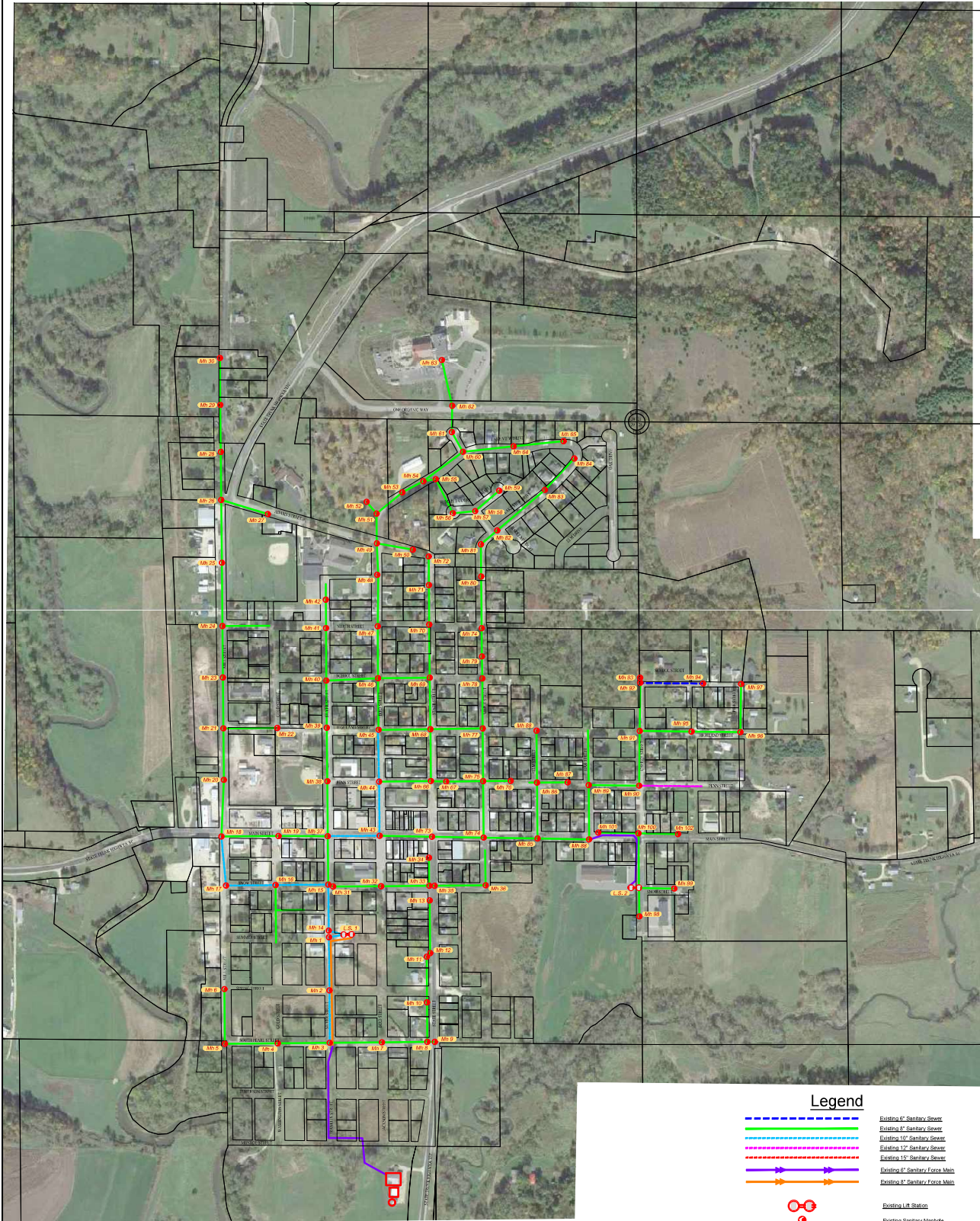
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Attachment #4

Sanitary Sewer System Map

Village of La Farge

La Farge, Wisconsin



Legend

- Existing 8" Sanitary Sewer
- Existing 12" Sanitary Sewer
- Existing 15" Sanitary Sewer
- Existing 18" Sanitary Sewer
- Existing 6" Sanitary Force Main
- Existing 8" Sanitary Force Main
- Existing Lift Station
- Existing Sanitary Manhole

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 PLATTEVILLE, WISCONSIN 53818
 808 JACKSON STREET PHONE: (562) 542-9005
 DUBLUQUE, IOWA 52001

G:\Projects\LaFarge\Maps\Utilities_SanitaryS.dwg

Attachment #5

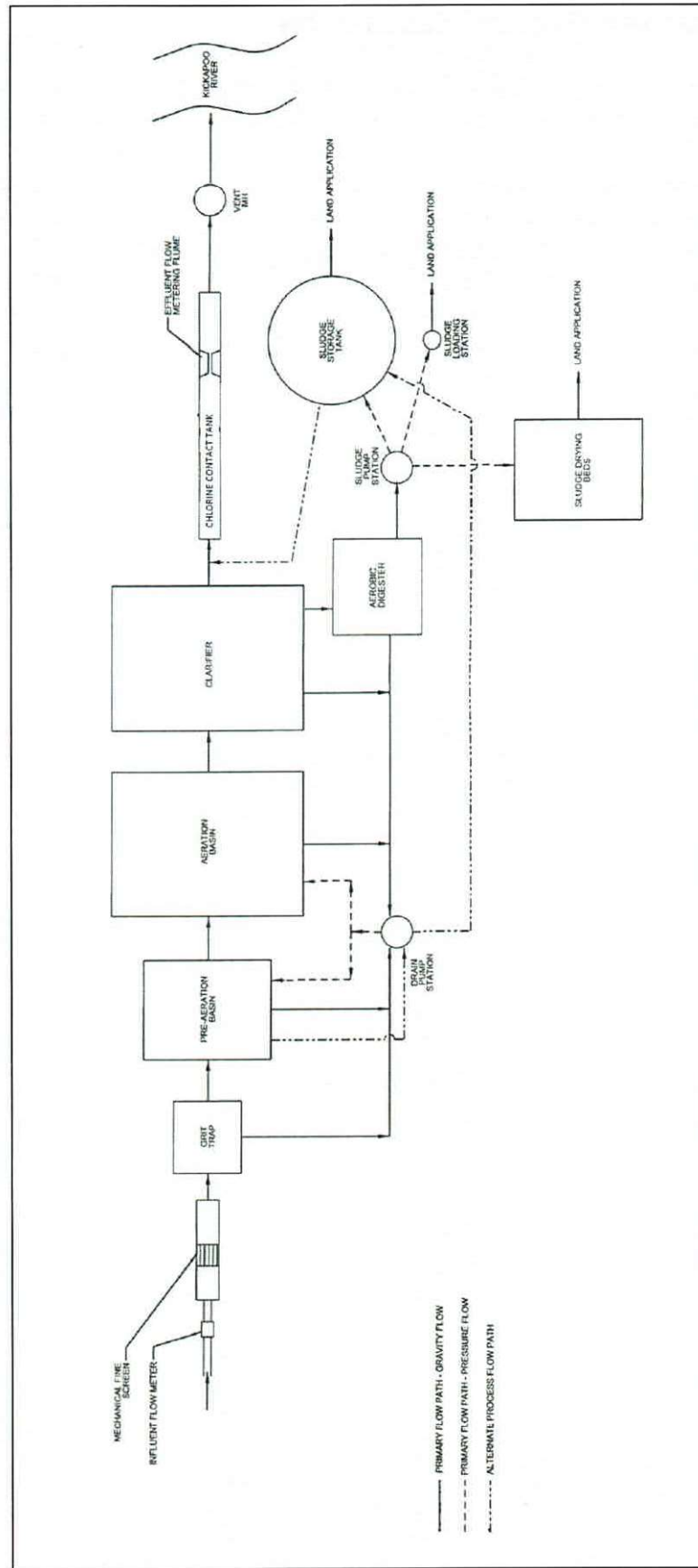


Figure 1-2: Wastewater Treatment Facility Flow Schematic

Attachment #6

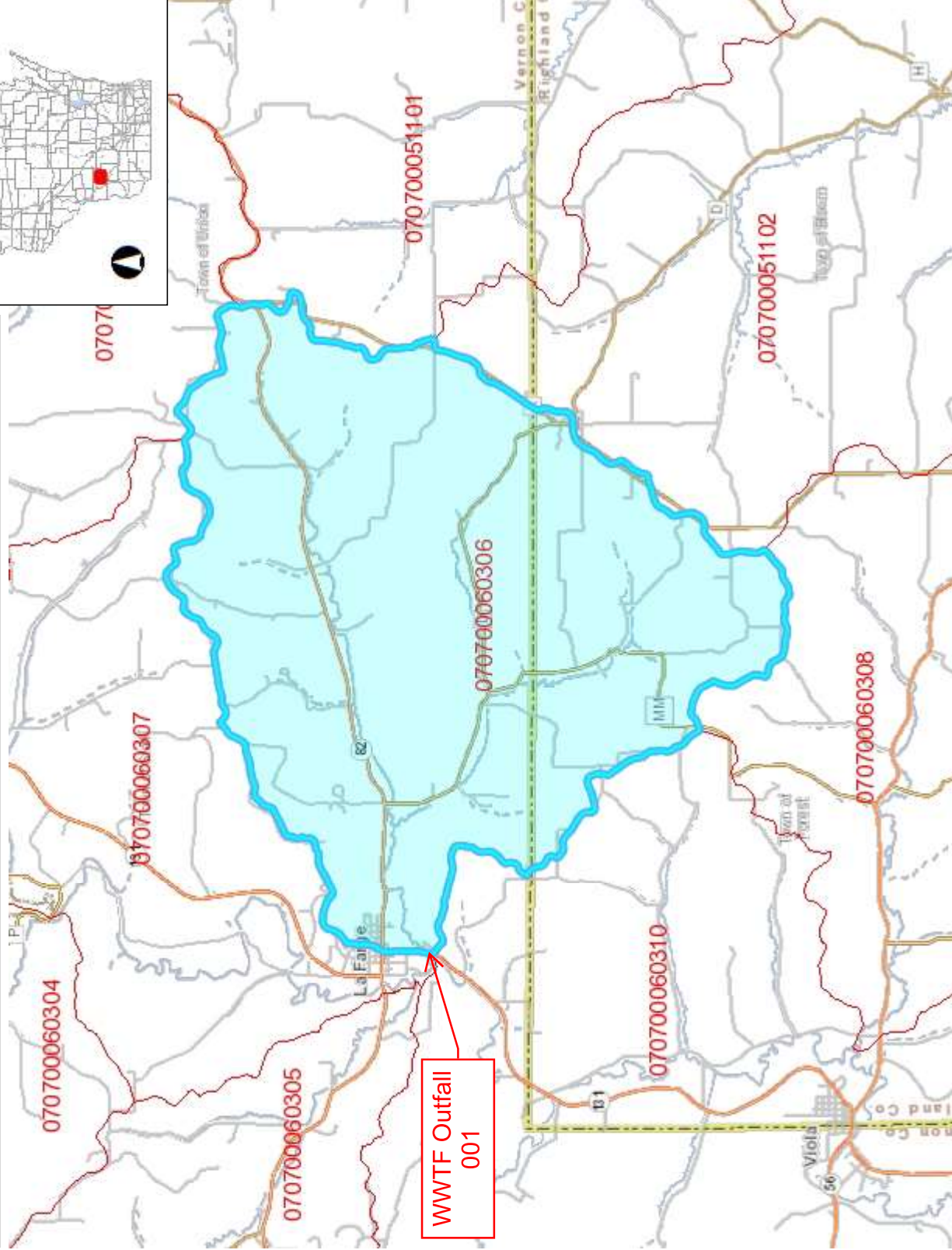


HUC-12 Watershed Map



Legend

- 12-digit HUCs (Subwatersheds)
- Municipality
- State Boundaries
- County Boundaries
- Major Roads
 - Interstate Highway
 - State Highway
 - US Highway
- County and Local Roads
 - County HWY
 - Local Road
- Railroads
- Tribal Lands
- Rivers and Streams
- Intermittent Streams
- Lakes and Open water



Notes

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/legal/>

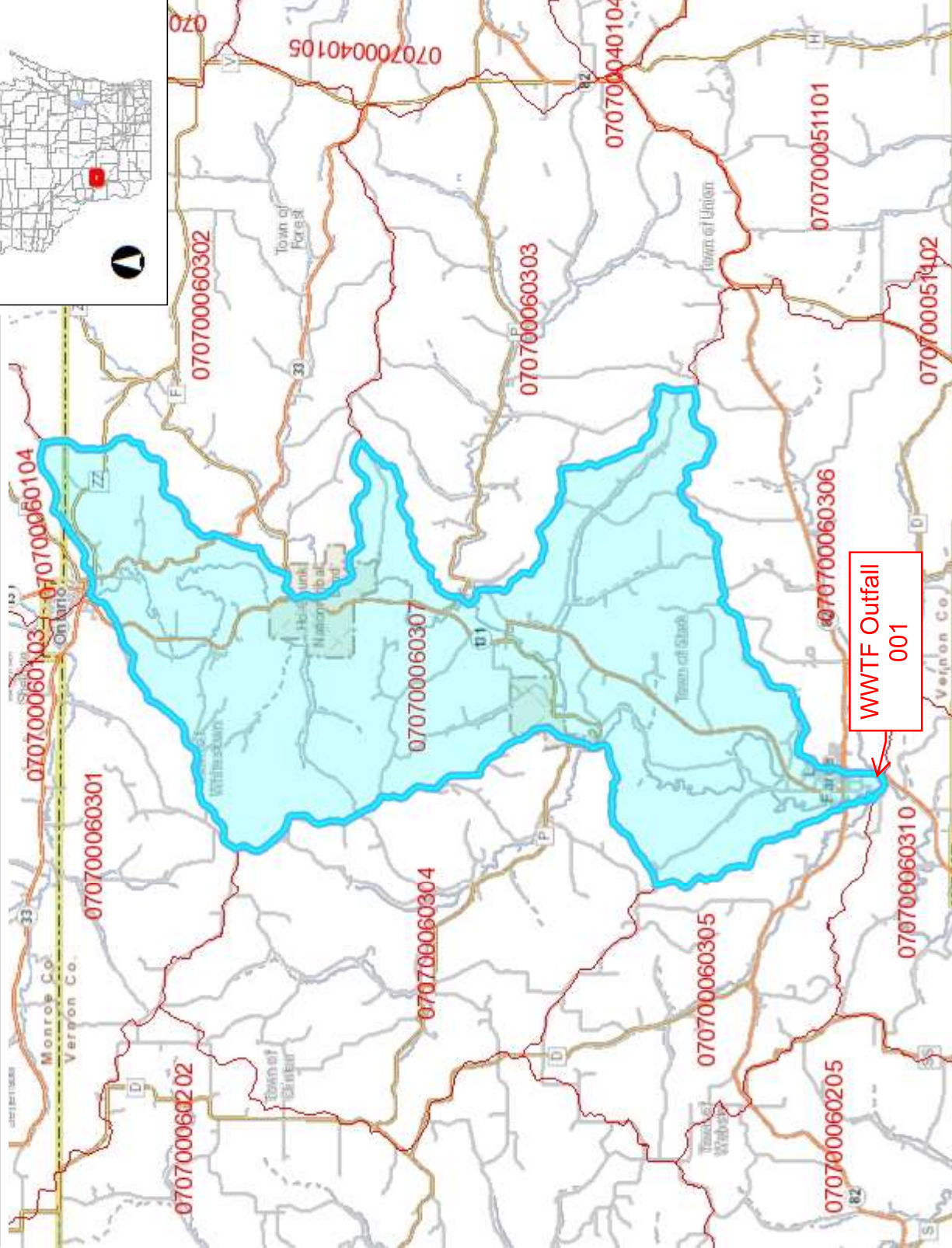


NAD_1983_HARN_Wisconsin_TM

1: 95,040



HUC-12 Watershed Map



Legend

12-digit HUCs (Subwatersheds)

Municipality

State Boundaries

County Boundaries

Major Roads

Interstate Highway

State Highway

US Highway

County and Local Roads

County HWY

Local Road

Railroads

Tribal Lands

Rivers and Streams

Intermittent Streams

Lakes and Open water

Notes

Village of La Farge

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/legal/>

4.0

0

2.00

4.0 Miles

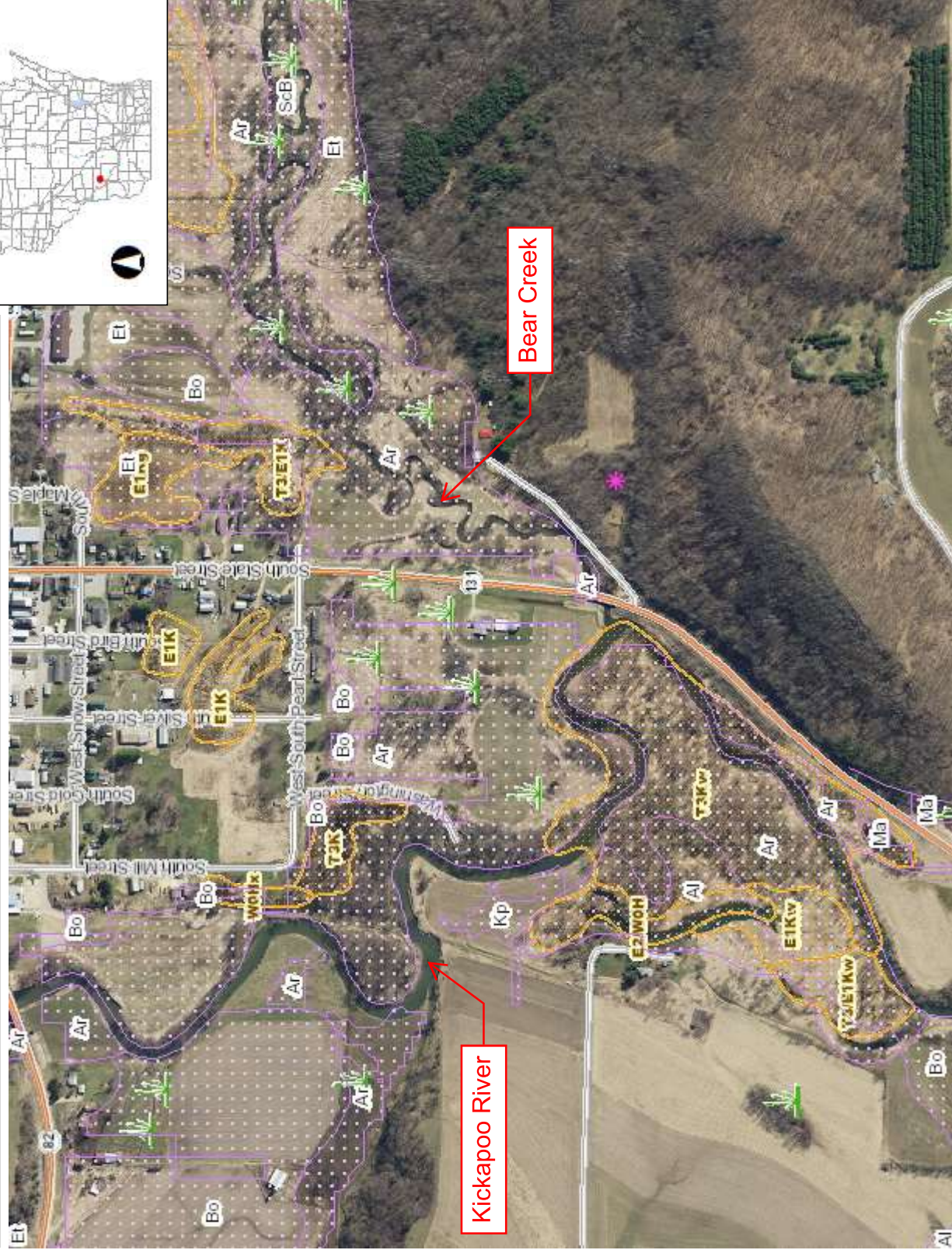
NAD_1983_HARN_Wisconsin_TM

1: 126,720

Attachment #7



Wetland Map



- Legend**
- Wetland Indicators
 - Wetland Class Areas
 - Wetland Class Points
 - Dammed pond
 - Excavated pond
 - Filled/draind wetland
 - Wetland too small to delineate
 - Filled excavated pond
 - Filled Points
 - Wetland Class Areas
 - Filled Areas
 - Wetland Class Areas
 - Wetland Class Points
 - Dammed pond
 - Excavated pond
 - Filled/draind wetland
 - Wetland too small to delineate
 - Filled excavated pond
 - Filled Points
 - Wetland Class Areas
 - Filled Areas
 - Wetland Identifications and Confirmations
 - NRCS Wetspots
 - Municipality
 - State Boundaries
 - County Boundaries
 - Major Roads
 - Interstate Highway
 - State Highway
 - US Highway
 - County and Local Roads
 - County HWY
 - Local Road
 - Railroads

Notes

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0.3 Miles

0.13

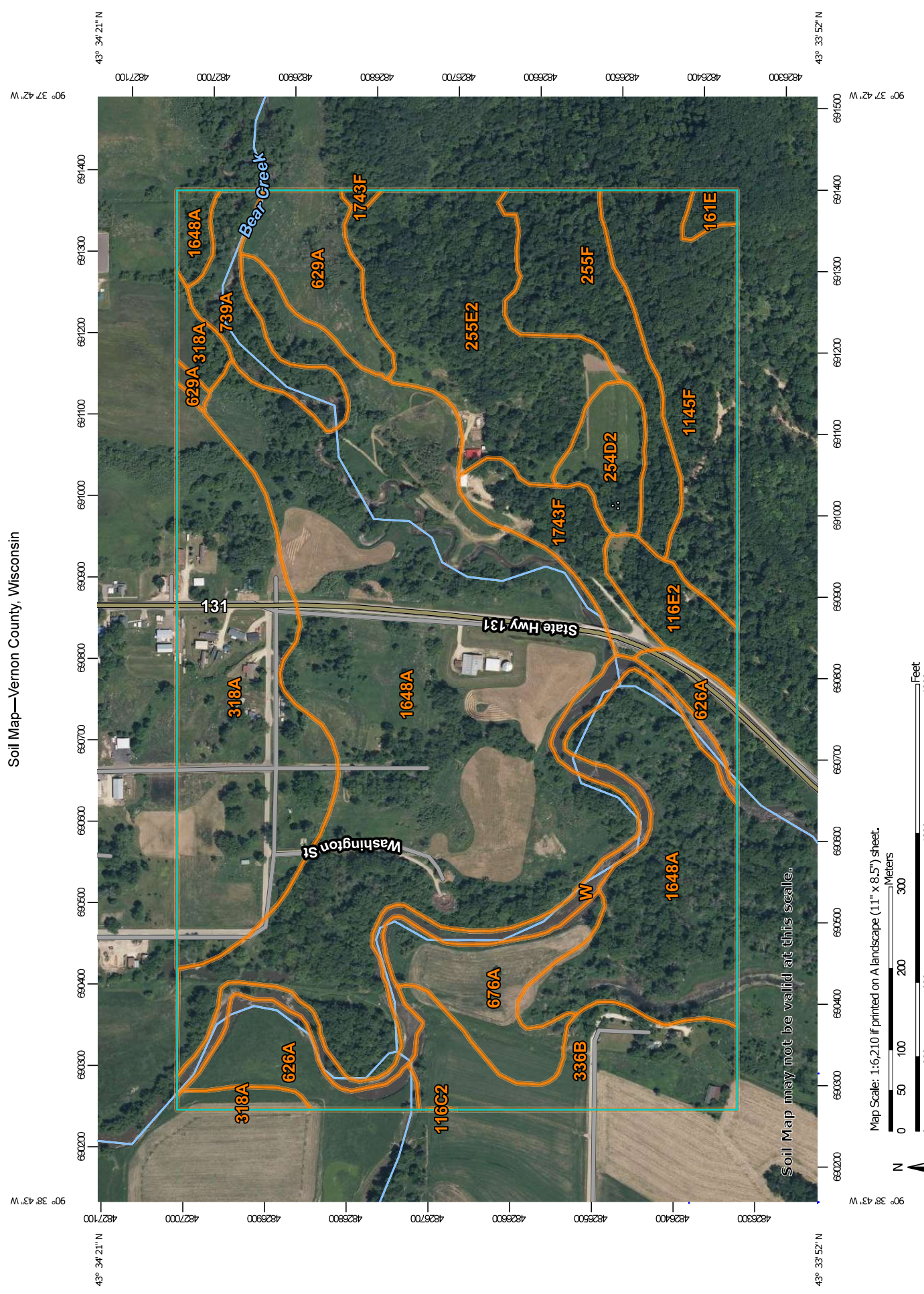
0

NAD_1983_HARN_Wisconsin_TM

1: 7,920

Attachment #8

Soil Map—Vernon County, Wisconsin



MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)

Soils

Soil Map Unit Polygons

Soil Map Unit Lines

Soil Map Unit Points

Special Point Features

Blowout

Borrow Pit

Clay Spot

Closed Depression

Gravel Pit

Gravelly Spot

Landfill

Lava Flow

Marsh or swamp

Mine or Quarry

Miscellaneous Water

Perennial Water

Rock Outcrop

Saline Spot

Sandy Spot

Severely Eroded Spot

Sinkhole

Slide or Slip

Sodic Spot

Water Features

Streams and Canals

Transportation

Rails

Interstate Highways

US Routes

Major Roads

Local Roads

Background

Aerial Photography

Spoil Area

Stony Spot

Very Stony Spot

Wet Spot

Other

Special Line Features

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:12,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Vernon County, Wisconsin
Survey Area Data: Version 17, Sep 6, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Apr 1, 2020—Oct 1, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
116C2	Churchtown silt loam, 6 to 12 percent slopes, moderately eroded	0.0	0.0%
116E2	Churchtown silt loam, 20 to 30 percent slopes, moderately eroded	3.6	1.9%
161E	Fivepoints silt loam, 20 to 30 percent slopes, moderately eroded	0.7	0.4%
254D2	Norden silt loam, 12 to 20 percent slopes, moderately eroded	3.3	1.7%
255E2	Urne fine sandy loam, 20 to 30 percent slopes, moderately eroded	16.2	8.4%
255F	Urne fine sandy loam, 30 to 45 percent slopes	8.4	4.4%
318A	Bearpen silt loam, 0 to 3 percent slopes, rarely flooded	24.7	12.9%
336B	Toddville silt loam, 1 to 6 percent slopes	9.5	4.9%
626A	Arenzville silt loam, 0 to 3 percent slopes, occasionally flooded	6.1	3.2%
629A	Ettrick silt loam, 0 to 2 percent slopes, frequently flooded	5.5	2.9%
676A	Kickapoo fine sandy loam, 0 to 3 percent slopes, occasionally flooded	6.6	3.4%
739A	Root loam, 0 to 2 percent slopes, frequently flooded	4.3	2.2%
1145F	Gaphill-Rockbluff complex, 30 to 60 percent slopes	12.5	6.5%
1648A	Northbend-Ettrick silt loams, 0 to 3 percent slopes, frequently flooded	79.8	41.5%
1743F	Council-Elevasil-Norden complex, 20 to 45 percent slopes, rocky	4.8	2.5%
W	Water	5.9	3.1%
Totals for Area of Interest		192.1	100.0%



710 Commerce Drive
PO Box 169
Watertown, WI 53094

920-261-0446 phone
920-261-1365 fax
www.rockriverlab.com

Insight FS Darlington, WI - Total Phosphorus Analysis 12/09/2022

Field ID	Sample ID	Total P (ppm)
Lafarge 1E	1	344.2
Lafarge 1E	5	337.2
Lafarge 1E	9	605
Lafarge 1E	13	444.6
Lafarge 1E	17	502.1
Lafarge 1E	21	482.8
Creek	34N	337.5
Creek	38N	592.9
Creek	42N	386.5
Creek	36S	294.8
Creek	40S	314.3
Creek	43	251.4

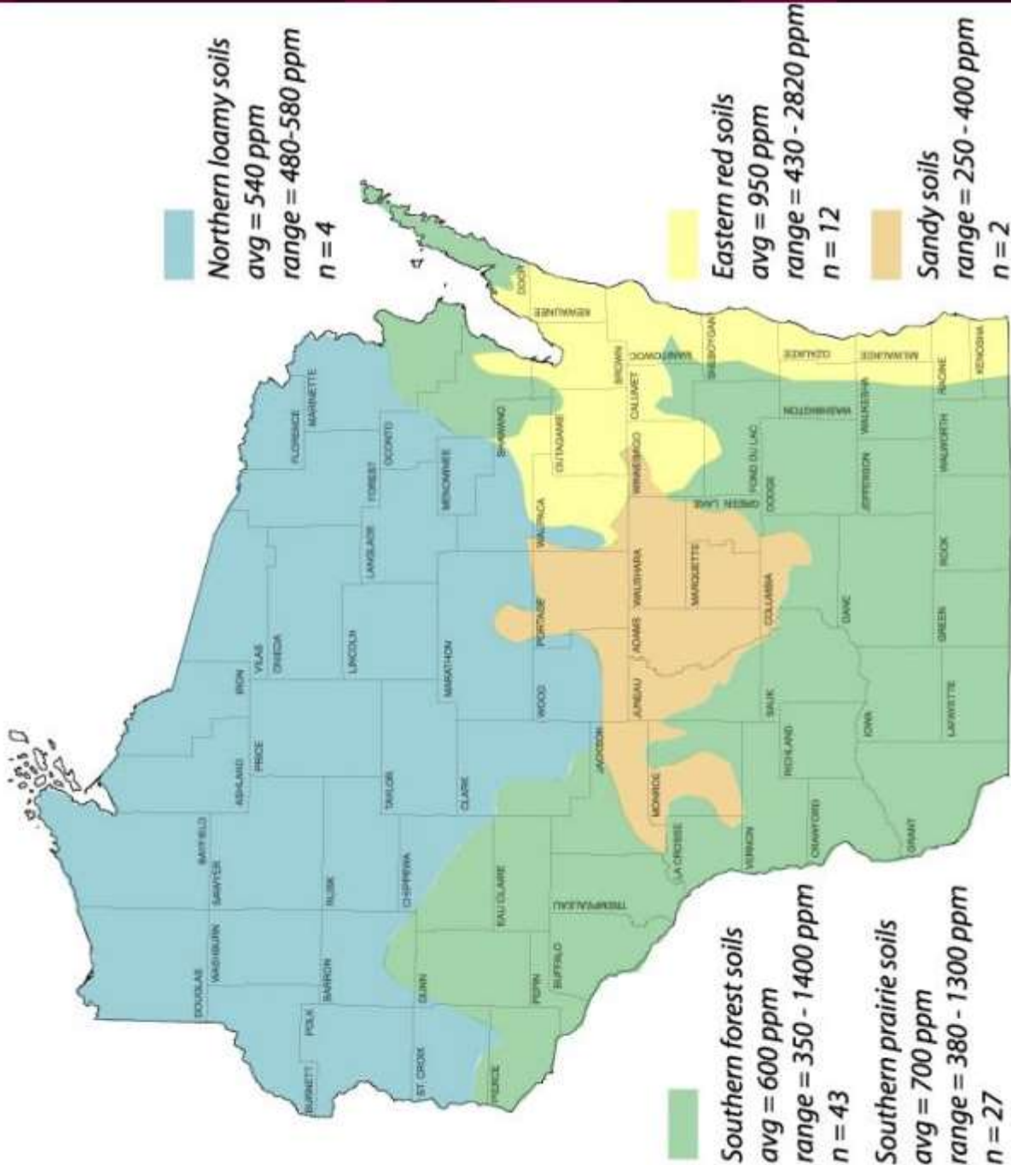
Reach 2

Reach 1

Reach 3

Field ID	Sample ID	Total P (ppm)
Latarge WQT	26N	802.9
Latarge WQT	28N	373.7
Latarge WQT	30N	406.8
Latarge WQT	32N	532
Lafarge 1 E	25	754.4
Lafarge 1W	3	325.2
Lafarge 1W	7	510.3
Lafarge 1W	15	364.2
Lafarge 1W	11	429.4
Lafarge 1W	23	74.6
Lafarge 1W	19	760.7

Soil Total P



Attachment #9

Photo	Station Number
1	104+00
2	107+25
3	107+50
4	115+25
5	117+75
6	119+75
7	127+50
8	133+50
9	135+75
10	136+75
11	203+50
12	204+00
13	205+00
14	207+25
15	206+00
16	206+75

ATTACHEMENT #9
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III.	Reach 3.....	7

I. Introduction

The lateral recession rate of the eroding bank is a critical component for the NRCS Streambank Erosion Estimator. The following documentation provides the justification for the lateral recession rates used in the NRCS Streambank Erosion Estimator. Lateral recession rate was estimated based on the photos provided, description, and on site evaluation. The following includes representative photos of the Project Extents to be stabilized through installation of Best Management Practices (BMPs).

II. Reach 1



Image 1 – Severe undercut with slump, vegetative overhang, bare soil visible, and fallen trees.



Image 2 – Severe undercut with slump, vegetative overhang, bare soil visible, and fallen trees.

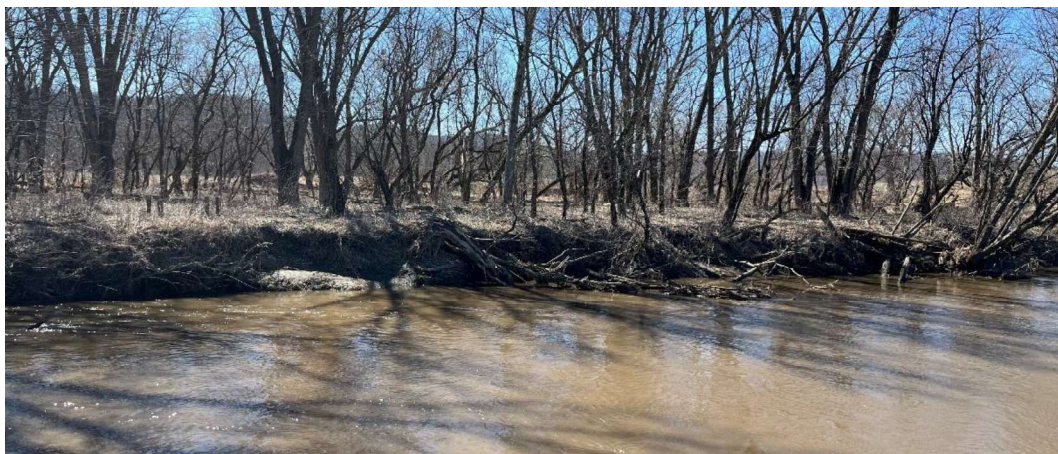


Image 3 – Severe undercut with slump, vegetative overhang, bare soil visible, and fallen trees.



Image 4 – Severe undercut with slump, vegetative overhang, bare soil visible, and slumped trees.



Image 5 – Severe undercut with slump, vegetative overhang, bare soil visible, and fallen trees.



Image 6 – Severe undercut with slump, vegetative overhang, bare soil visible, exposed tree roots, and slumped trees.



Image 7 – Severe undercut with slump, vegetative overhang, bare soil visible, and fallen trees.

Reach 2



Image 8 – Near vertical banks with bare soil and vegetative overhang.



Image 9 – Near vertical banks with bare soil, vegetative overhang, slumped trees, and fallen trees.



Image 10 – Severe undercut with vegetative overhang. Note that the grass overhang is hiding some of the eroded bank. Severe scarp areas are visible as noted.

III. Reach 3



Image 11 – Near vertical banks with bare soil, vegetative overhang, slumped trees, and fallen trees.



Image 12 – Severe undercut with slump and vegetative overhang.



Image 13 – Severe undercut with slump, vegetative overhang, bare soil visible, and slumped trees.

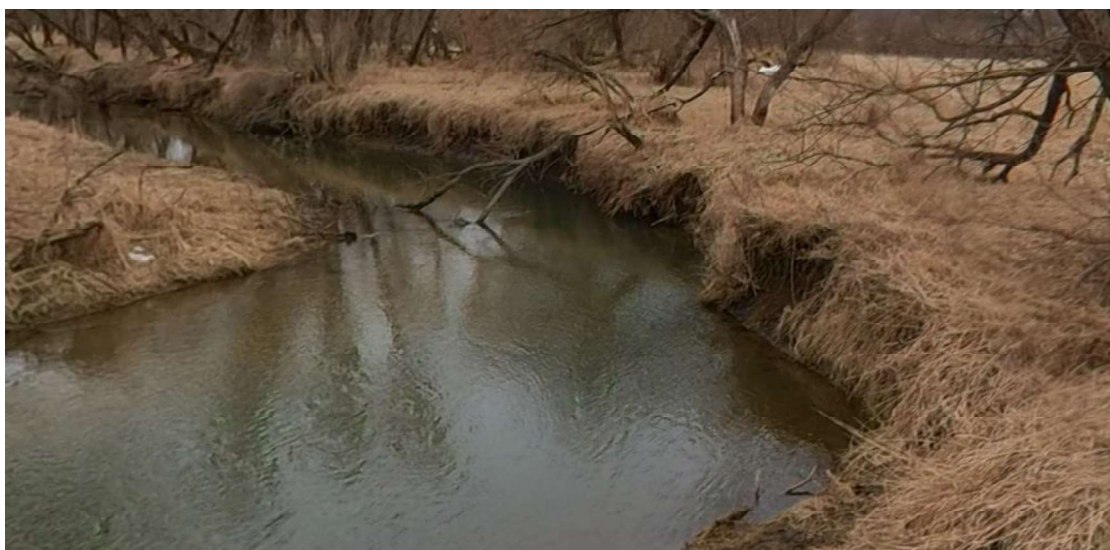


Image 14 – Severe undercut with slump and vegetative overhang.



Image 15 – Severe undercut with slump, vegetative overhang, and fallen trees.

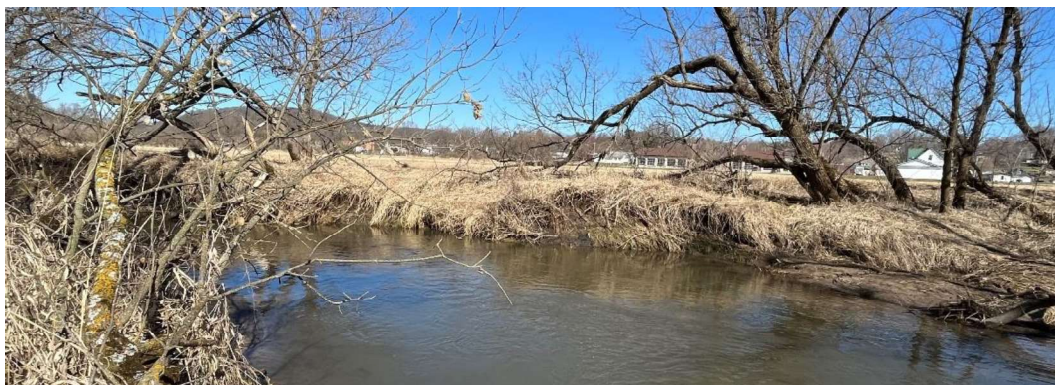


Image 16 – Severe undercut with slump and vegetative overhang.

Attachment #10

Annual soil loss predictions for conservation planning purposes are made with current soil loss prediction technology (RUSLE2). RUSLE2 estimates sheet, rill and interrill erosion. Erosion that is seasonal in nature and caused by concentrated flow, however, is not predicted by RUSLE2.

This workbook provides conservation planners with simple tools and processes to help estimate the amount of erosion occurring in ephemeral gullies, classic gullies and on streambank erosion sites.

Definitions:

Rill Erosion: consists of the removal of soil by concentrated water running through little streamlets, or headcuts. Detachment in a rill occurs if the sediment in the flow is below the amount the load can transport and if the flow exceeds the soil's resistance to detachment. As detachment continues or flow increases, rills will become wider and deeper. Rills may be of any size but are usually less than four inches deep. Rills are:

- <> generally parallel on the slope, but may converge,
- <> generally of uniform spacing and dimension,
- <> generally appear at different locations on the landscape from year to year,
- <> generally shorter than ephemeral cropland gullies,
- <> usually end at a concentrated flow channel, or an area where the slope flattens and deposition occurs,
- <> are on the same portion of the slope that is used to determine the length of slope (L) for RUSLE2,
- <> many small, but conspicuous channels running in the direction of slope gradient

Rill erosion is considered in the RUSLE2 calculations.

Ephemeral Gully Erosion: Small erosion channels formed on crop fields as a result of concentrated flow of runoff water. These channels are routinely eliminated by tillage of the field but return following subsequent runoff events. Ephemeral Gullies are small enough to be eliminated (temporarily) with the use of typical farm tillage equipment and they:

- <> recur in the same area of concentrated flow each time they form,
- <> frequently form in well-defined depressions in natural drainage ways,
- <> are generally wider, deeper, and longer than the rills in the field,

Ephemeral Gullies are **not** calculated by the RUSLE2 program.

Gully Erosion: Permanent gullies are formed when channel development has progressed to the point where the gully is too wide and too deep to be tilled across. These channels carry large amounts of water after rains and deposit eroded material at the foot of the gully. They disfigure landscape and make the land unfit for growing crops. Gullies:

- <> may grow or enlarge from year to year by head cutting and lateral enlarging,
- <> often occur in depressions or natural drainage ways,
- <> may begin as ephemeral gullies that were left in the field untreated,
- <> may, over time, become partially stabilized by grass, weeds or woody vegetation,

Gully erosion is not calculated by the RUSLE2 program.

Streambank Erosion: The wearing away of streambanks by flowing water. The removal of soil from streambanks is typically caused by the direct action of stream flow and/or wind/wave action, typically occurring during periods of high flow. Streambank erosion:

- <> is a natural process that generally increases when unprotected streambanks (e.g. no woody vegetation) are subject to the actions of flowing water and ice damage.
- <> is a common occurrence on many Vermont river channels that are experiencing geomorphic adjustments

The soil loss from ephemeral gullies, gullies and streambank erosion areas can be estimated by calculating the volume of soil removed by erosion processes. The volume of soil loss can be multiplied by the typical unit weight of the soil (based on soil texture) which is eroded. Approximate soil unit weights are expressed below¹:

Soil Texture	Estimated Dry Density lb/ft ³
Gravel	110
Sand	105
Loamy Sand	100
Sandy Loam	100
Fine Sandy Loam	100
Sandy Clay Loam	90
Silt Loam	85
Silty Clay Loam	85
Silty Clay	85
Clay Loam	85
Organic	22

Procedure for estimating Ephemeral Soil Erosion:

The following formula will be used to calculate annual estimated ephemeral gully erosion:

$$\text{Ephemeral Gully Length} \times \text{Gully Average Width} \times \text{Gully Average Depth} \times \text{Soil Weight (lbs/ft}^3\text{)} \times \text{Occurrences per Year} = \text{Estimated Soil Loss (Tons per Year)}$$

* Ephemeral gully erosion may reform multiple times per year, and under certain conditions it may not form in a given year. The voided volume which would be calculated after a runoff event is not necessarily representative of an annual rate, but is representative of only the specific event. This erosion can be calculated for individual storms and can be summed for a yearly estimate.

¹ Data from published soil surveys, laboratory data, and soil interpretation record are to be used where available. Parent materials, soil consistency, soil structure, pore space, soil texture, and coarse fragments all influence unit weight.

Procedure for estimating Gully Soil Erosion:

The following formula will be used to calculate annual estimated classic gully erosion:

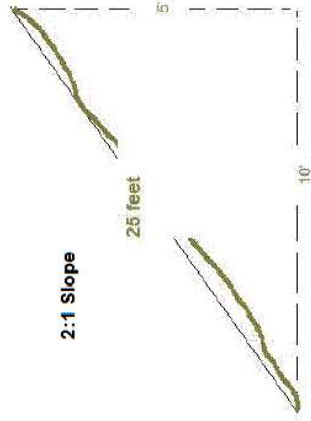
$$\frac{\text{Gully Length} \times (\text{Average Width} \times 0.5) \times \text{Soil Weight (lbs/ft}^3\text{)}}{2000} \div \text{Formation Years} = \frac{\text{Estimated Soil Loss Per Year}}{\text{(Tons)}}$$

Procedure for estimating Streambank Soil Erosion (Direct Volume Method):

The following formula will be used to calculate annual estimated streambank erosion unless a field measurement procedure² is used:

$$\frac{\text{Eroding Bank Length} \times \text{Eroding Bank Height} \times \text{Lateral Recession Rate (FT/YR)} \times \text{Soil Weight (lb)}}{2000} = \frac{\text{Estimated Soil Loss Per Year}}{\text{(Tons)}}$$

****** Eroding bank height is measured along the bank, not the vertical height of bank. Example: if vertical height of an eroding streambank is 5 feet, and the bank is on a 2:1 slope, the total eroding bank distance is 25 feet -- 1/2 (Base X Height).



*******The average annual recession rate is the thickness of soil eroded from a bank surface (perpendicular to the face) in an average year.

Stream bank erosion sometimes presents itself as a major occurrence in a given year, whereas the same bank may not erode significantly for a period of years if no major runoff events occur. Recession rates need to be calculated as an average of years when erosion does and does not occur. Recession rate is not calculated as the erosion occurring after a single event.

Use available resources to assist in the estimation of recession rate: use past and present aerial photography, old survey records, and any other information that helps to determine the bank condition at known times in the past. When such information is lacking or insufficient, field observations and professional judgement are needed to estimate recession rates.

It is often not possible to directly measure recession rates in the field. Therefore, the following table has been included which relates recession rates to narrative descriptions of banks eroding at different rates (Table from NRCS Wisconsin guidance).

Lateral Recession Rate (ft/yr)	Category	Description
0.01-0.05	Slight	Some bare bank but active erosion not readily apparent. Some rills but no vegetative overhang. No exposed tree roots.
0.06-0.2	Moderate	Bank is predominantly bare with some rills and vegetative overhang. Some exposed tree roots but no slumps or slips.
0.3-0.5	Severe	Bank is bare with rills and severe vegetative overhang. Many exposed tree roots and some fallen trees and slumps or slips. Some changes in cultural features such as fence corners missing and realignment of roads or trails. Channel cross section becomes U-shaped as opposed to V-shaped.
0.5+	Very Severe	Bank is bare with gullies and severe vegetative overhang. Many fallen trees, drains and culverts eroding out and changes in cultural features as above. Massive slips or washouts common. Channel cross section is U-shaped and stream course may be meandering.

- 2 The best way to quantify streambank erosion is to measure it directly in the field. The basic procedure in measuring streambank erosion is to survey, flag, or in some way fix a "before" image of the channel you are evaluating in order to establish the baseline condition. Changes due to erosion can then be monitored over time by going back to the study area and re-measuring from the fixed reference points. Channel cross-sections can be surveyed and plotted on a periodic basis to monitor change. Stakes or pins can be driven into channel banks flush with the surface. The amount of stake or pin exposed due to erosion is the amount of change at the streambank erosion site between your times of observation. The time required to monitor a site often precludes this method of data collection. The Direct Volume Method can be used to estimate streambank erosion at your site.

Acknowledgements: This Excel workbook was created as a planning tool for use by conservation planners. The basic format and content of the tool is a compilation of various similar tools, processes and procedures employed by NRCS in several states including: Indiana, Iowa, Kansas, Maryland, Michigan, Missouri, Nebraska, Oklahoma, South Dakota and Wisconsin. Some of the terminology in the 'Definitions' section of this Readme document closely mirrors these sources.

NRCS Streambank and Irrigation Ditch Erosion Estimator (Direct Volume Method)	
Farmer / Cooperator Name:	Village of La Farge
Tract Number:	Varies
Evaluated By:	J. Fure
Evaluation Date:	March 25, 2024

Field Number	Eroding Streambank Reach #; or Ditch Side/Bottom	Eroding Bank or Ditch Length (Feet)	Eroding Bank Height; or Ditch Bottom Width* (Feet)	Area of Eroding Streambank or Ditch (FT ²)	Lateral or Ditch Bottom Recession Rate (Estimated) (FT / Year)	Estimated Volume (FT ³) Eroded Annually	Soil Texture	Approximate Pounds of Soil per FT ³	Estimated Soil Loss (Tons/Year)	Soil Total Phosphorus (ppm)	Estimated Phosphorus Loss (Pounds/Year)
Village Property	1.1 (Left)	450	12.15	5,468	0.40	2,187.0	Silt Loam	85	92.9	340.70	63
	1.2 (Left)	250	12.20	3,050	0.40	1,220.0	Silt Loam	85	51.9	444.60	46
	1.3 (Left)	150	15.68	2,352	0.30	705.6	Silt Loam	85	30.0	473.35	28
	1.4 (Left)	400	10.74	4,296	0.50	2,148.0	Silt Loam	85	91.3	502.10	92
	1.5 (Left)	600	14.52	8,712	0.30	2,613.6	Silt Loam	85	111.1	618.60	137
	2.1 (Left)	125	15.04	1,880	0.30	564.0	Silt Loam	85	24.0	373.70	18
	2.2 (Left)	375	9.24	3,465	0.30	1,039.5	Silt Loam	85	44.2	469.40	41
	3 (Left)	571	12.34	7,046	0.50	3,523.1	Silt Loam	85	149.7	592.90	178
TOTAL						14,000.8			595.0		604

Reach	ID	STA	Top of Bank Elevation	Water Elevation	Vertical Bank	Horizontal Bank	Bank Height
	1.1	1	104+00	792.11	785.32	6.79	11.35
	1.1	2	104+50	792.60	784.71	7.89	15.64
	1.1	3	105+25	790.02	784.38	5.64	9.15
	1.1	4	106+25	790.27	783.86	6.41	13.34
	1.1	5	107+25	790.46	783.79	6.67	11.28
AVERAGE					6.68	10.12	12.15
	1.2	11	114+75	787.60	783.14	4.46	11.59
	1.2	12	115+00	790.63	780.71	9.92	13.60
	1.2	13	116+50	784.26	777.53	6.73	11.40
AVERAGE					7.04	9.73	12.20
	1.3	14	117+25	788.94	782.36	6.58	18.8
	1.3	15	118+00	787.79	782.15	5.64	12.72
	1.3	16	118+50	788.53	783.49	5.04	14.41
AVERAGE					5.75	14.57	15.68
	1.4	17	119+00	790.25	782.89	7.36	8.03
	1.4	18	119+50	789.21	782.57	6.64	13.54
	1.4	19	120+75	789.08	782.77	6.31	9.73
	1.4	20	122+00	788.95	782.94	6.01	11.67
AVERAGE					6.58	8.10	10.74
	1.5	21	123+00	787.85	783.01	4.84	14.72
	1.5	22	124+00	788.48	782.24	6.24	17.64
	1.5	23	125+50	788.95	782.13	6.82	12.44
	1.5	24	126+50	788.23	782.11	6.12	13.74
	1.5	25	127+50	787.25	782.08	5.17	14.08
AVERAGE					5.84	13.24	14.52
	2.1	27	134+50	786.70	782.59	4.11	12.31
	2.2	28	135+50	788.91	781.82	7.09	17.78
AVERAGE					5.60	13.95	15.04
	2.2	29	136+25	787.34	781.30	6.04	8.17
	2.2	30	137+00	788.66	782.29	6.37	10.15
	2.2	31	138+00	788.24	781.98	6.26	10.32
	2.2	32	139+00	787.10	781.76	5.34	8.34
AVERAGE					6.00	7.00	9.24
	3	40	203+75	794.40	788.97	5.43	12.72
	3	39	204+75	794.33	788.47	5.86	14.17
	3	38	205+75	795.16	788.83	6.33	7.60
	3	37	206+75	794.05	788.55	5.5	5.79
	3	36	207+75	792.00	788.23	3.77	12.29
AVERAGE					5.38	8.42	10.51

Attachment #1 1

Water Quality Trading Operation and Maintenance Plan

Introduction:

The Water Quality Trading (WQT) Operation and Maintenance (O&M) Plan is meant to be a working document and should be updated as new trading practices are implemented. Currently, the Operation and Maintenance Plan revolves around the Best Management Practice (BMP) construction along the Kickapoo River and Bear Creek. The attached *BMP Inspection Form* should be completed during annual inspections of BMPs and following major storm events. Inspection forms shall be retained for at least five (5) years to ensure compliance with the WQT Plan.

Publicly Owned BMP:

Village representative to complete inspection form annually and following major storm events. The form will then be provided to the Maintenance Supervisor following inspection. The Village will address maintenance issues identified during inspection within 30 days. Substantial maintenance issues may require an extended timeframe for generation of plans, specifications, and a public bid process to perform the work. Inspections and O&M activities shall be reported in the annual WQT Report sent to the DNR.

Privately Owned BMP:

Village representative to complete inspection form annually and following major storm events. The form will then be provided to the Maintenance Supervisor following inspection. The Village will address maintenance issues identified during inspection within 30 days. Substantial maintenance issues may require an extended timeframe for generation of plans, specifications, and a public bid process to perform the work. Maintenance expenses will be incurred by either by the Village or Private Property Owner depending on agreement with the Village. The Private Property Owner will be allowed to perform maintenance activities at the expense of the Private Property Owner. Inspections and O&M activities shall be reported in the annual WQT Report sent to the DNR.

Quality Assurance:

Riprap gradation and composition shall be provided for each source of material. Streambank shaping and riprap shall be installed per the Vernon County Land Conservation Department and NRCS Standards. Contractors to supply rock that is approved by the NRCS and meets criteria in Wisconsin Construction Spec.9.

Installation:

- Staking provided by the Engineer.
- Do not place riprap over frozen or spongy subgrade surfaces.
- Place riprap as indicated on Construction Plans. Do not dump rip-rap over the bank.
- Blend riprap with existing bank.
- Spread soil out in a layer of less than 4" and seed down. Do not spread soil in wetlands.
- All disturbed areas and soil must be seeded and mulched.
- Install habitat structures per Plans and Specifications.

Practice Registration:

The purpose of the "Water Quality Trading Management Practice Registration" form is to report to DNR that a management practice identified in the trading plan has been properly installed and is established

and effective. This information will be used to track implementation progress, verify compliance and perform audits, as necessary. A registration form should be submitted for every management practice that has been identified in the trading plan. If practices are established prior to trading plan submittal, registration forms may be submitted with the trading plan. Otherwise, registration forms should be submitted during the permit term as practices become effective or with the annual report. A blank *Water Quality Trading Management Practice Registration Form 3400-207* is attached and should be submitted following implementation of the trading practice.

Tracking Procedures:

The Village will track credits used monthly. The Village will report credit usage to the DNR on a monthly basis in the Discharge Monitoring Reports (DMRs). The annual report will summarize the 12 months of credit usage and credit generation. The Village will report to DNR any concern that they have that may result in a need to modify the trade agreement and/or this trade plan. For example, a need to generate additional credits based on discharge.

Inspections/Maintenance Considerations:

- A *BMP Inspection Form* is attached.
 - Site: As noted on Construction Plans
 - Condition of BMP: Excellent; Good; Fair; or Poor
 - Maintenance Estimate: Provide an estimate for how long the maintenance will take to complete or a dollar value for completion. This will help determine if the Village will perform the work or if the Village will hire another entity to perform the work.
 - Date Completed: Following completion of the required maintenance, input the date of completion.
 - Comments: Provide the required maintenance activity along with any other useful information. If the cell provided is not large enough for Comments, write “See Back of Sheet” and provide comments on the reverse side of the Form.
- Following installation, inspect the disturbed areas closely over the next few months to ensure that seeding grows.
- BMPs may settle or shift especially after flooding events or freeze/thaw.
- May need to control weed and brush growth.
- Inspect stabilized areas as needed.
- At a minimum, inspect after major storm events.
- If a BMP has been damaged, repair it promptly to prevent a progressive failure.
- If repairs are needed repeatedly at a location, evaluate the site to determine if the original design conditions have changed.

Routine Maintenance Items that can be performed by Village:

- Evaluate BMP condition
 - Reconstruct/replace BMPs that have settled, shifted, or washed out.
- Manage Vegetation
 - Remove invasive/noxious plants.
- Manage Garbage
 - Remove garbage and other debris that could otherwise impair the streambank stability.
- Habitat Structures
 - Verify structures have remained in place during periods of low flow.

Monthly Certification:

Each month, the Village will certify that the BMPs are maintained and operating in a manner consistent with this Water Quality Trading Plan or provide a statement noting noncompliance with this Plan. The monthly Discharge Monitoring Report (DMR) will include the following statement as a certification of compliance when the Credit Generating Practice is operating in a manner consistent with the Plan:

“I certify that to the best of my knowledge that the management practices identified in the approved water quality trading plan as the source of phosphorus credits is installed, established and properly maintained.”

Annual Inspection:

An annual inspection of the BMPs will be performed by a licensed Professional Engineer to ensure that the BMPs are functioning as intended in order to meet the requirements of the WQT Plan.

Noncompliance:

The Village will notify DNR by telephone call to DNR’s regional wastewater compliance engineer within 24 hours or next business day of becoming aware that phosphorus credits used or intended for use by Village are not being generated as outlined in this Water Quality Trading Plan.

The Village will submit a written notification within five days after the Village recognizes that the phosphorus credits are not being generated as outlined in the Trading Plan. DNR may waive the requirement for submittal for a written notice within five days and instruct the Village to submit the written notice with the next regularly scheduled monitoring report required by Village’s WPDES Permit.

The written notification should include:

- Description of noncompliance and cause.
- Period of noncompliance including dates and times.
- Schedule for attaining compliance including time and steps toward compliance.
- Plan to prevent reoccurrence of the noncompliance.

Notification of Trade Agreement Termination:

If a trade agreement or the trading plan needs to be terminated during the permit term, the permittee should submit a Notice of Termination to the wastewater engineer/specialist to inform DNR of the termination. DNR staff should use this information to determine if a permit modification is required due to the termination, the termination will result in non-compliance, or other permit actions are required due to the termination. When credits are reduced or eliminated for any reason, the permittee is still required to meet their WQBELs without any grace period. To prevent noncompliance with WQBELs, changes to trading plans must be addressed before credits are lost. Modifying the permit/trading plan will require at least 180 days. A blank *Notification of Water Trade Agreement Termination Form 3400-209* is attached and should be submitted to DNR prior to practice termination, no later than the submittal date of the annual report.

Streambank Inspection Form

Date: _____

Inspector: _____

Reason for Inspection (circle one): Monthly / Precipitation Event / Other: _____

Last Inspection Photos Date: _____
(inspection photos should be taken annually at minimum)

Reach	Condition of BMP	Required Maintenance	Maintenance Estimate (Time or Cost)	Date Completed	Comments
1 (Left)					
2 (Left)					
3 (Left)					

Photos Taken? ☐ Yes ☐ No

All Habitat Structures Verified? ☐ Yes ☐ No
If no, explain

**Water Quality Trading Management
Practice Registration**
Form 3400-207 (R 1/14)

Notice: Pursuant to s. 283.84, Wis. Stats., this form must be completed by any WPDES permittee that is using water quality trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Applicant Information				
Permittee Name		Permit Number WI-	Facility Site Number	
Facility Address		City	State	ZIP Code
Project Contact Name (if applicable)	Address	City	State	ZIP Code
Project Name				

Broker/Exchange Information (if applicable)		
Was a broker/exchange be used to facilitate trade? <input type="radio"/> Yes <input type="radio"/> No		
Broker/Exchange Organization Name	Contact Name	
Address	Phone Number	Email

Trade Registration Information (Use a separate form for each trade agreement)					
Type	Trade Agreement Number	Practices Used to Generate Credits	Anticipated Load Reduction	Trade Ratio	Method of Quantification
<input type="radio"/> Urban NPS <input type="radio"/> Agricultural NPS <input type="radio"/> Other					
County	Closest Receiving Water Name		Land Parcel ID(s)	Parameter(s) being traded	

The preparer certifies all of the following:

- I have completed this document to the best of my knowledge and have not excluded pertinent information.
- I certify that the information in this document is true to the best of my knowledge.

Signature of Preparer	Date Signed
-----------------------	-------------

Authorized Representative Signature	
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	
Signature of Authorized Representative	Date Signed

Leave Blank – For Department Use Only		
Date Received		Trade Docket Number
Entered in Tracking System <input type="checkbox"/> Yes	Date Entered	Name of Department Reviewer

Notification of Water Trade Agreement Termination

Form 3400-209 (1/14)

Notice: Pursuant to s. 283.84, Wis. Stats., and ch. NR 217 Wis. Adm. Code, this form must be completed by any WPDES permittee that is using water quality trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Applicant Information

Permittee Name	Permit Number WI-	Facility Site Number		
Facility Address	City	State	ZIP Code	
Project Contact Name (if applicable)	Address	City	State	ZIP Code
Project Name				

Credit Generator Information

Credit generator type (select all that apply):

<input type="checkbox"/> Permitted Discharge (non-MS4/CAFO)	<input type="checkbox"/> Urban nonpoint source discharge
<input type="checkbox"/> Permitted MS4	<input type="checkbox"/> Agricultural nonpoint source discharge
<input type="checkbox"/> Permitted CAFO	<input type="checkbox"/> Other - Specify:

Trade Agreement number(s) to be terminated including affected land parcel ID(s):

Amount of trading credit being terminated	Effective date of termination
Reason for termination	

Is this agreement being updated or replaced?

- ☐ Yes
☐ No
☐ Unsure

Will this termination result in non-compliance with the effective limit or other permit requirements?

- ☐ Yes; Name: _____
☐ No
☐ Unsure

The preparer certifies all of the following:

- I am familiar with the specifications submitted for this application, and I believe all applicable items in this checklist have been addressed.
- I have completed this document to the best of my knowledge and have not excluded pertinent information.

Signature of Preparer	Date Signed
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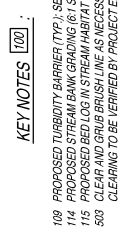
Authorized Representative Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative	Date Signed
--	-------------

Attachment #12

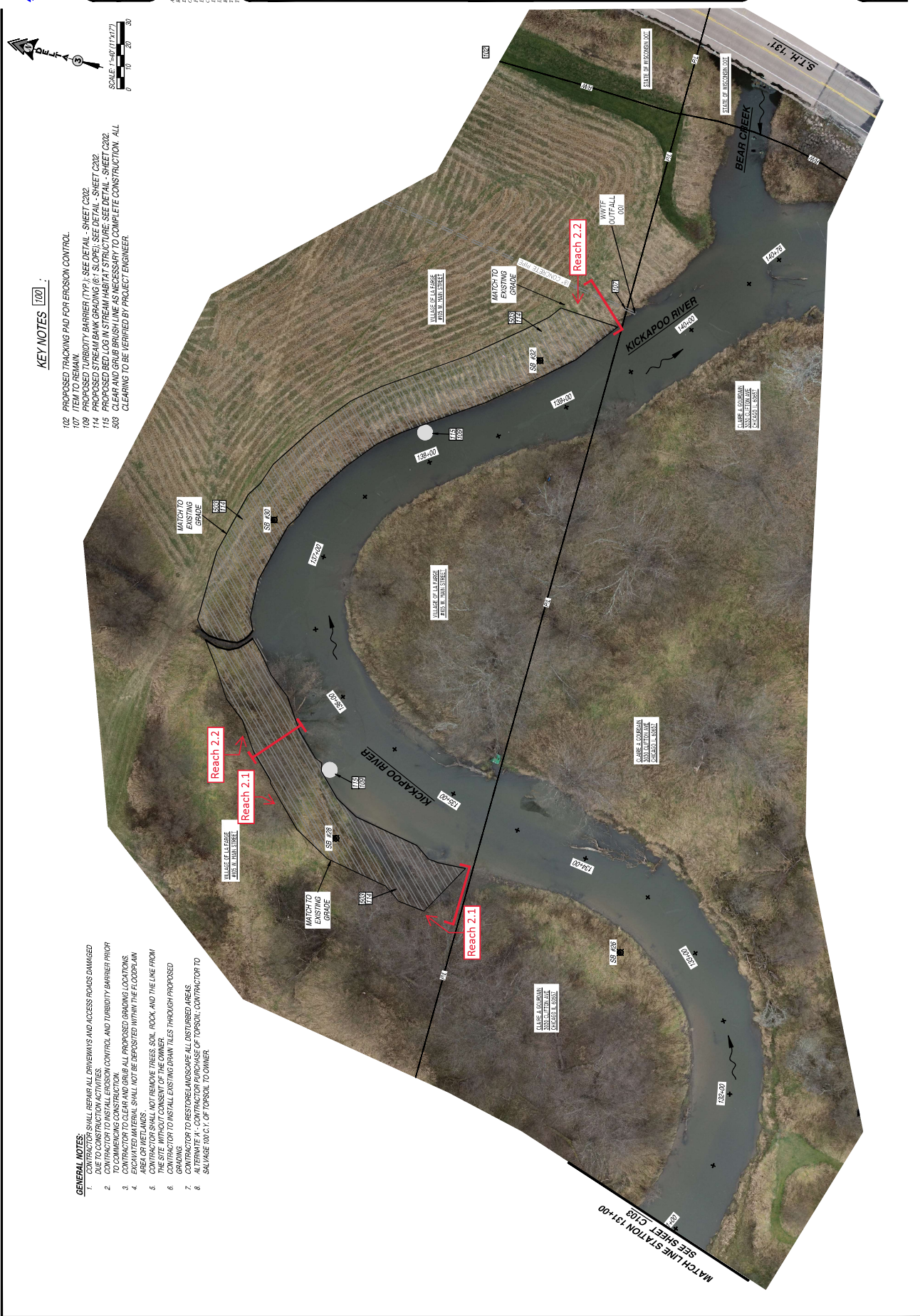
POSED 2023 STREAM IMPROVEMENTS - KICKAPOO RIVER & BEAR CREEK



1. GENERAL NOTES
2. CONTRACTOR SHALL REPAIR ALL DRIVEWAYS AND ACCESS ROADS DAMAGED DUE TO CONSTRUCTION ACTIVITIES.
3. CONTRACTOR TO INSTALL EROSION CONTROL AND TURBIDITY BARRIER PRIOR TO COMMENCING CONSTRUCTION.
4. CONTRACTOR SHALL PROPOSED GRADING LOCATIONS EXHIBITED AN MATERIAL SHALL NOT BE DEPOSITED WITHIN THE FLOODPLAIN AREA OF WETLANDS.
5. CONTRACTOR SHALL NOT REMOVE TREES, SOIL, ROCK, AND THE DUNE FORM.
6. CONTRACTOR TO INSTALL EXISTING GRAM TILES THROUGH PROPOSED GRADING.
7. CONTRACTOR TO REPAIR AREAS OF INSTIGATED AREAS.
8. ALTERNATE TO PROPOSED PUMPAGE OF TORSION CONTRACTOR TO SALVAGE 10% OF TORSION TO OWNER.

[illegible]

FOR BID	
PROJECT NUMBER	1222-145
SHEET SCALE	SEE BAR SCALE
DRAWN BY	JORDAN FURE
DATE ISSUED	MARCH 23, 2023
SHEET DESC.	PLAN VIEW - REACH 2





April 29, 2025

Frank Quinn, Village President
La Farge Wastewater Treatment Plant
105 West Main Street
La Farge, WI 54639

Subject: La Farge WWTF WPDES Permit #WI-0024465
Water Quality Trading Plan – CONDITIONAL CREDIT CERTIFICATION

Dear Mr. Quinn,

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 La Farge WWTF on 04/03/2025. 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 streambank stabilization. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the 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-2025-0010

Year	Available TP Credits Total (lbs/yr)
2025	201
2026	201
2027	201
2028	201
2029	201*

The department conditionally certifies 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-2025-00010 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. Any modifications to the WQT plan within the permit term will also require a modification to the permit and a public notification period.

If you have any questions or comments, please contact me at 715-492-4323 or at jenna.monahan@wisconsin.gov

Thank You,

A handwritten signature in black ink that reads "Jenna Monahan". The signature is written in a cursive, flowing style.

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

e-CC: Wayne Haugrud, Public Works Manager
Greg Lawton, Utility Clerk
Bart Nies, Delta 3
Logan Hoppman, Delta 3
Jordan Fure, Delta 3
Katherine Jerzak, WDNR
Matthew Claucherty, WDNR
Geisa Bittencourt, WDNR