June 9th, 2022

Peter Hartz  
Wastewater Manager  
800 Hoffman Drive  
Watertown, WI 53094

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

Dear Mr. Hartz:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Watertown WWTF. The initial plan was received in November of 2021 and updated versions were received in April of 2022 and June of 2022. Based on WDNR review, the final WQT Plan (dated June 2022) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes installation of cover crop practices on agricultural lands and wetland restoration. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be installed by August 31, 2022. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits beginning January 1st, 2023.

Table 1: Total Phosphorus Credits Available per WQT-2022-0006

<table>
<thead>
<tr>
<th>Year</th>
<th>Available Credits (lbs/yr) – Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2022</td>
<td>25.5</td>
</tr>
<tr>
<td>2023</td>
<td>102</td>
</tr>
<tr>
<td>2024</td>
<td>102</td>
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<td>2025</td>
<td>102</td>
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<td>2026</td>
<td>102</td>
</tr>
<tr>
<td>2027</td>
<td>102</td>
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</tbody>
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The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. This approval is not to be construed as an approval for any activities requiring a permit under ch. 30 or 31, Wis. Stats. The Department has assigned the WQT plan a tracking number of WQT-2022-0006 and will be referenced as such in the draft WPDES permit. The final WQT plan will be included as part of the public notice package for permit reissuance. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring for total phosphorus.
If you have any questions or comments, please contact me at 608-535-0368 or at sean.spencer@wisconsin.gov

Thank You,

Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:
Leo Kucek, Applied Technologies
Jen Jerich, WDNR
Ashley Brechlin, WDNR