



July 26, 2019

Philip Risseeuw, Clerk-Treasurer
P O Box 207
Darlington, WI 53530

Subject: Darlington Wastewater Treatment Facility- WPDES Permit #WI-0021016
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Risseeuw:

The Department recently received a finalized water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Darlington Wastewater Facility. The initial plan was received in June of 2018 and updated versions were received in December of 2018 and July of 2019. Based on the WDNR review, the final WQT Plan (dated July 12, 2019) is in general conformance with the WDNR Water Quality Trading Guidance and Wis. Stat 283.84. As a condition of approval, please note the follow:

Proposed Aquatic Habitat Adjustment – The WQT plan proposes to install riparian buffer habitat at streambank stabilization sites. Per WDNR guidance, an aquatic habitat adjustment may reduce the uncertainty factor of a practice (lowering the trade ratio) if the management measure or practice addresses both the traded pollutant and specific habitat impairments. While riparian buffers would provide habitat benefits to terrestrial organisms, the riparian buffers will not directly mitigate habitat impacts caused by excess phosphorus and sediment within the stream. The riparian habitat measures contained within the WQT plan will not qualify for the aquatic habitat adjustment. Therefore, the following points should be considered:

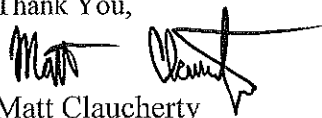
- The riparian buffers outlined in the WQT plan are not required to be implemented as part of this trade.
- The applicable trade ratio, absent an aquatic habitat adjustment, is 3:1. Credit availability, listed below and included in the WPDES permit, reflect this.
- The riparian buffers may be implemented and registered as a WQT practice, and may generate credits at a future date if they are maintained, pending quantification and department approval of a future WQT Plan.

The WQT plan indicates that the Darlington Facility will utilize Water Quality Trading to comply with the effluent limitations for total phosphorus for their discharge to the West Branch Pecatonica River through streambank stabilization. The WQT Plan proposes the generation of 435 pounds/year of phosphorus credits for the next five years.

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The WDNR has assigned the WQT plan a tracking number of WQT-2019-0001 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)-264-9244 or at matthew.claucherty@wisconsin.gov

Thank You,

A handwritten signature in black ink, appearing to read 'Matt Claucherty', with a long horizontal stroke extending to the right.

Matt Claucherty
Water Resources Management Specialist
Wisconsin Department of Natural Resources

e-CC: Dennis McPhail, City of Darlington
Jordan Fure, Delta Three Engineering
Caitlin Oconnell, WDNR
Jennifer Jerich, WDNR