



January 4th, 2022

Susan Jones, Clerk
 16977 State Highway 80
 Richland Center, WI 53581

Subject: Hub Rock Sanitary District #1 WWTF - WPDES Permit WI- 0049689
 Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Susan Jones:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Hub Rock Sanitary District #1 WWTF. The initial plan was received in January of 2022 and an updated version was received in September of 2021. Based on WDNR review, the final WQT Plan (dated September 2021) 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 streambank stabilization. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be installed by June 30th, 2022. 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 beginning July 1st, 2024.

Table 1: Total Phosphorus Credits Available per WQT-2022-0001

Year	Available Credits (lbs/yr) – Total
2022	65.5
2023	131
2024	131
2025	131
2026	131

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-2022-0001 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 608-535-0368 or at sean.spencer@wisconsin.gov

Thank You,

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

Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:

Carson Hackett, Davy Engineering
Jennifer Jerich, WDNR
Caitlin O'Connell, WDNR