



October 31, 2022

David Botts, Utility Director  
 123 E. Delavan Drive  
 Janesville, WI 53546

Subject: Janesville Wastewater Utility - WPDES Permit WI- 0030350  
 Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Botts:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Janesville Wastewater Utility Plant. The initial plan was received in January of 2022 and updated versions were received in June of 2022, August of 2022, and October of 2022. Based on WDNR review, the final WQT Plan (dated October 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 over crop practices on agricultural lands, barnyard diversions, and grassed waterways. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into a modified WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits.

Table 1: Total Phosphorus Credits Available per WQT-2022-0007

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2023	74.45	1287.08	1361.53
2024	74.45	1287.08	1361.53
2025	74.45	1287.08	1361.53
2026	74.45	1287.08	1361.53
2027	74.45	1287.08	1361.53

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-2022-0007 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](mailto: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:

Chris Murphy, Rock County Land Conservation Department  
Jen Jerich, WDNR  
Ashley Brechlin, WDNR