



March 20, 2019

Jim Schecklman, Mayor
City of Greenwood
102 North Main Street
Greenwood, WI 54437

Subject: Greenwood WPDES Permit #WI-0020249
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Schecklman:

Thank you for submitting the final draft of the Water Quality Trading (WQT) Plan for the City of Greenwood. The final plan was received on February 27th, 2019. The Department has reviewed the additional documentation and final report and has no comments at this time.

Based on the WDNR review, the WQT Plan is in general conformance with the WDNR Water Quality Trading Guidance and Wis. Stat 283.84. The WQT plan indicates that the City of Greenwood will utilize Water Quality Trading to comply with the effluent limitations for TP for their discharge to the Black River through water quality trading credits generated from whole field management practices and conservation easements with local dairy farmers and landowners. The table below summarizes the proposed phosphorus credits.

Year	Available TP Credits (lbs/yr)
2019	1,190
2020	1,174
2021	1,110
2022	1,384
2023*	1,193

*In the event that this permit is not reissued prior to the expiration date, 1,193 lbs/yr of credits will be available in subsequent year(s).

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-2019-0006 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. WDNR will review the data provided by the City of Greenwood to assess whether any additional modifications to the WQT Plan and associated water quality trades are required prior to reissuance of the next WPDES permit.

If you have any questions or comments, please contact me at 715-839-3712 or at benjamin.hartenbower@wisconsin.gov

Sincerely,

Benjamin Hartenbower, P.E.

CC (email): Trent Johnson, City of Greenwood
Ezra Gotham, Morgan & Parmley, Ltd.
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Angela Parkhurst, WDNR