

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
Waukesha Service Center  
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Waukesha WI 53188

Scott Walker, Governor  
Daniel L. Meyer, Secretary  
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October 31, 2018

Paul Gregor, Plant Manager  
Alliant Energy  
1401 W. B-R Townline Road  
Beloit WI 53511

Subject: WPL-Riverside WPDES Permit #WI-0061921  
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Gregor:

The Department received the final draft of the Water Quality Trading (WQT) Plan on behalf of WPL-Riverside. The final plan was received in January 2018 and additional items were received on June 16<sup>th</sup>, 2018. The Department has reviewed the additional documentation and final report and has no additional 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 WPL-Riverside will utilize Water Quality Trading to comply with the effluent limitations for total phosphorus for their increased discharge to the Rock River through perennial vegetation and stormwater practices. The WQT Plan proposes the generation of a range of 29.9 lbs/yr to 381.5 lbs/yr 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-2018-0005 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 WPL - Riverside 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 608-264-9244 or at [matthew.claucherty@wisconsin.gov](mailto:matthew.claucherty@wisconsin.gov).

Thank you again,

A handwritten signature in black ink that reads "Matt Claucherty".

Matt Claucherty  
Water Resources Management Specialist  
Wisconsin Department of Natural Resources

CC. Bill Skalitzky – Alliant Energy