



October 30, 2020

Leo A. Kucek – Applied Technologies, Inc.
13400 Bishops Lane, Suite 270
Brookfield, WI 53005

Subject: Western Racine County Sewerage District (WPDES Permit No. WI-0028754)
Adaptive Management Plan – Conditional Approval

Dear Mr. Kucek:

The Wisconsin Department of Natural Resources (WDNR) has received the final draft of the Adaptive Management (AM) Plan prepared by Applied Technologies, Inc. on behalf of the Western Racine County Sewerage District (District). The AM plan was submitted on September 30, 2020 and reflected several discussions that we had leading up to that date. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR's review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the District will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the District Wastewater Treatment Plant, Outfall 001, to the Fox River. Actions outlined in the AM plan involve nonpoint phosphorus reductions throughout six local HUC 12 Watersheds and a portion of another HUC 12 that fall within and upstream of the District service area. For continued AM eligibility, phosphorus reductions undertaken by the District and various AM partners are expected to offset approximately one half of the total reductions needed to bring the river into compliance with the 0.100 mg/L water quality criteria, or 198 lbs/yr, within the first permit term.

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2020-0013 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The WDNR appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at (414) 399-3039 or nicholas.lent@wisconsin.gov.

Thank you,

Nick Lent

Wastewater Engineer
Wisconsin Department of Natural Resources

e-CC: Jeff Bratz – Western Racine County Sewerage District
Jacob Wedesky – WDNR
Lisa Creegan – WDNR
Matt Claucherty – WDNR
Bryan Hartsook – WDNR