



March 16, 2021

Loren Schwier, Director of Public Works  
 Village of West Salem  
 900 West Avenue  
 West Salem, WI 54669

Subject: Village of West Salem WPDES Permit #WI-0020389  
 Water Quality Trading Plan – CONDITIONAL CREDIT CERTIFICATION

Dear Mr. Schwier:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Village of West Salem Wastewater Treatment Facility. Based on WDNR review, the final WQT Plan (dated February 17, 2021) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes to generate 903 lbs/yr of phosphorus credits through a dredging project in Neshonoc Lake. An agreement was drafted for the Village of West Salem to use 445 lbs/year of the dredging project credits. The Lake Neshonoc Protection and Rehabilitation District intends to sell the remaining 458 lbs/year of credit through a trade agreement with a downstream user.

The table below summarizes the proposed phosphorus credits for the Village of West Salem. These credits are generated and expire on a calendar year basis.

Project	Reductions (lbs./yr.)	Trade Ratio	Credits
Neshonoc Lake Dredging	1,806	2:1	903
Credits reserved by Lake Neshonoc Protection and Rehabilitation District			- 458
<b>Total credits allocated to West Salem</b>			<b>445 lbs./yr.*</b>

\*In the event that this permit is not reissued prior to the expiration date, 445 lbs./yr. of credits will be available in subsequent year(s).

The WDNR certifies the credits in this WQT Plan as a basis for water quality trading during the WPDES permit term. Please note that the continued viability of credits will be dependent on future monitoring data. Prior to a second permit term of water quality trading using credits generated from the Lake Neshonoc dredging, the water quality trading plan must be updated with new monitoring data that conforms to the following:

- Sediment samples collected from the dredge cut should be analyzed using similar methods as those documented in the February 17, 2021 water quality trading plan.
- Equations in the updated water quality trading plan must use new data to recalculate the phosphorus flux rate from the sediment to surface waters of Lake Neshonoc.
- Available credits must reflect the updated phosphorus flux rate. Available credits are determined by comparing the pre-dredge phosphorus flux rate to the current (post-dredge) phosphorus flux rate.

It is recommended that West Salem consider additional WQT projects during the permit term to address the potential for reduced or unavailable credits, should monitoring data indicate that the dredge cut has refilled more quickly than the current WQT plan predicts.

The WDNR has assigned the WQT Plan a tracking number of WQT-2021-0005 which 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 Village of West Salem 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. Any modifications to the WQT Plan within the permit term will also require a modification to the permit and a public notification period.

If you have any questions or comments, please contact me at 715-225-4705 or at [Benjamin.Hartenbower@wisconsin.gov](mailto:Benjamin.Hartenbower@wisconsin.gov).

Sincerely,



Benjamin Hartenbower, PE  
Water Resources Engineer  
Wisconsin Department of Natural Resources

CC (email): Teresa DeLong, Village of West Salem  
Jim Leicht, Lake Neshonoc Protection and Rehabilitation District  
Dave Sauer, Cedar Corporation  
Joe Martirano, Cedar Corporation  
Joe Pingel, Cedar Corporation  
Matt Claucherty, WDNR  
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