



April 13, 2020

John Nehmer
Operator
CITY OF COLUMBUS
537 River Road
Columbus, WI 53925

SUBJECT: Conditional Approval of Columbus WWTF's Water Quality Trading Plan
Permit: WI-0021008-10-0

Dear Permittee:

The Department received the final draft of the Water Quality Trading (WQT) Plan prepared by Ruekert & Mielke on behalf of the Columbus WWTF. The final plan, dated April 2020, was received via electronic submittal on April 2, 2020. The Department has reviewed the WQT plan 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 requirements in Wis. Stat. 283.84. The plan indicates that the Columbus WWTF will utilize WQT to comply with the effluent limitations for total phosphorus for their discharge to the Crawfish River through trading with upstream non-point sources for Water Quality Based Effluent Limitations compliance. Practices will be installed and compliance with total phosphorus WQBELs will begin on 7/1/2021. The WQT Plan proposes the purchase of phosphorus credits included in the following table:

Year	Available TP Credits (lbs/yr) – Long Term	Available TP Credits (lbs/yr) – Interim	Total Credits Available
2021	150	15	165
2022	300	31	331
2023	300	31	331
2024	300	31	331
2025	300	31	331

The WDNR conditionally provides the WQT Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the WQT plan a tracking number of WQT-2020-0004 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 Columbus 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 feel free to contact me at 608-275-7775, or at sean.spencer@wisconsin.gov.

Sincerely,

Sean Spencer

Wastewater Specialist

cc: Permit File – Region and Central Office
Doris Thiele