



January 4th, 2022

Mary Jean Hanfield, Clerk
P.O. Box 12
Kieler, WI 53812

Subject: Kieler Sanitary District #1 WWTF - WPDES Permit WI- 0029289
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mary Jean Hanfield:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Kieler SD #1 WWTF. The initial plan was received in December of 2020 and updated versions were received in August of 2021 and December of 2021. Based on WDNR review, the final WQT Plan (dated December 2021) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes installation of streambank stabilization. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be installed by May 31st, 2023. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits beginning June 1st, 2023.

Table 1: Total Phosphorus Credits Available per WQT-2022-0002

Year	Available Credits (lbs/yr) – Total
2023	140.6
2024	241
2025	241
2026	241
2027	241
2028	241

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. This approval is not to be construed as an approval for any activities requiring a permit under ch. 30 or 31, Wis. Stats. The Department has assigned the WQT plan a tracking number of WQT-2022-0002 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 for total phosphorus.

If you have any questions or comments, please contact me at 608-535-0368 or at sean.spencer@wisconsin.gov

Thank You,

A handwritten signature in black ink that reads "Sean Spencer". The signature is written in a cursive, flowing style.

Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:

Jordan Fure, Delta Three Engineering
Jennifer Jerich, WDNR
Caitlin O'Connell, WDNR