



17035 West Wisconsin Avenue, Suite 120
Brookfield, Wisconsin 53005
Phone: (262) 264-5665
Web: probstgroup.com

June 25, 2018

Ms. Amy Garbe
Wastewater Engineer
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711

Via email to Amy.Garbe@wisconsin.gov

Re: Bemis Manufacturing Company – Notice of Intent for Water Quality Trading

Dear Ms. Garbe,

On behalf of the Bemis Manufacturing Company (Bemis), the Probst Group is providing a Notice of Intent to Conduct Water Quality Trading for Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0027456-08-0. The Notice of Intent to Conduct Water Quality Trading form (3400-206) is attached.

It is the intent of Bemis to achieve compliance with the phosphorus limitation using effluent trading. The details of the proposed effluent phosphorus trade will be developed and presented to the Department for review and approval.

If you have any questions or require any additional information regarding the intent to conduct water quality trading, please contact me (262.297.6044) at your convenience.

Sincerely,

Clair E. Ruenger, P.G.
The Probst Group

Enclosure (1)

cc: Denise Bond (Bemis Manufacturing Company)
Al Hendrickson (Bemis Manufacturing Company)
Mark Pronley (Probst Group)

Notice: Pursuant to s. 283.84, Wis. Stats., and ch. NR 217 Wis. Adm. Code, this form must be completed by any WPDES permittee that is using water quality trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Applicant Information

Permittee Name Bemis Manufacturing Company		Permit Number WI- 0027456-08-0	Facility Site Number Bemis Campus Plant D and E	
Facility Address W2940 Old County Road PP		City Sheboygan Falls	State WI	ZIP Code 53085
Project Contact Name (if applicable) Clair Rucnger, P.G.	Address 17035 West Wisconsin Avenue	City Brookfield	State WI	ZIP Code 53005

Project Name

Bemis Manufacturing Company Compliance Alternatives Evaluation

Receiving Water Name Sheboygan River	Parameter(s) being traded Total Phosphorus	HUC 12(s) 040301011108
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Is the permittee in a point or nonpoint source dominated watershed? Point source dominated
 (See PRESTO results - <http://dnr.wi.gov/topic/surfacewater/presto.html>) Nonpoint source dominated

Credit Generator Information

Credit generator type (select all that apply):
 Permitted Discharge (non-MS4/CAFO) Urban nonpoint source discharge
 Permitted MS4 Agricultural nonpoint source discharge
 Permitted CAFO Other - Specify: _____

Are any of the credit generators in a different HUC 12 than the applicant? Yes; HUC 12: _____
 No
 Unsure

Are any of the credit generators downstream of the applicant? Yes
 No
 Unsure

Will a broker/exchange be used to facilitate trade? Yes; Name: _____
 No
 Unsure

Point to Point Trades (Traditional Municipal / Industrial Discharge, MS4, CAFO)

Discharge Type	Permit Number	Name	Contact Address	Is the point source credit generator currently in compliance with their permit requirements?
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure

Notice of Intent to Conduct Water Quality Trading

Form 3400-206 (1/14)

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Point to Nonpoint Trades (Non-permitted Agricultural, Non-Permitted Urban, etc.)

List the practices that will be used to generate credits:


Conservation Easement (natural prairie restoration) with portions of parcels 59282920390, 59282920395, and 59282920750, located in Sheboygan County and owned by Bemis Manufacturing Company. Anticipated acreage is approximately 40 acres based on preliminary modeling results.

Method for quantifying credits generated: Monitoring
 Modeling, Names: SnapPlus 17.0
 Other: _____

Projected date credits will be available: 10/26/2019

The preparer certifies all of the following:

- I am familiar with the specifications submitted for this application, and I believe all applicable items in this checklist have been addressed.
- I have completed this document to the best of my knowledge and have not excluded pertinent information.

Signature of Preparer 

Date Signed
06.22.18

Authorized Representative Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative 

Date Signed
6.25.18