State of Wisconsin
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September 19, 2017

Dan Nemke Dynamic Holding, Inc. 737 W. Glen Oaks Lane Mequon WI 53092

Subject:

Springfield Clean Water WPDES Permit #WI-0065889

Water Quality Trading Plan - APPROVAL

Dear Mr. Nemke:

Thank you for submitting final draft of the Water Quality Trading (WQT) Plan on behalf of the Springfield Clean Water Project. The final plan was received on August 17<sup>th</sup>, 2017 and additional items were received on September 11<sup>th</sup>, 2017. The Department has reviewed the additional documentation and final report 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 Wis. Stat 283.84. The WQT Plan indicates that Springfield Clean Water will discharge from Outfall 001 between 32,600 to 70,000 gallons per day at an average total phosphorus (TP) concentration of 0.10 mg/L and total suspended solids (TSS) of 2.0 mg/L. The WQT plan indicates that Springfield Clean Water will utilize Water Quality Trading to comply with the effluent limitations for TP and TSS for their new discharge to the Pheasant Branch through grassed waterways. The WQT Plan proposes the generation of 99 lbs/yr of phosphorus credits and 145,733 lbs/yr of TSS credits for the next five years. The WQT Plan will need to be updated prior to permit expiration to quantify long term credits, since at this time, the WQT Plan only covers interim credits for the next five years.

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring. WDNR will review the data provided by Springfield Clean Water 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 or comments, please contact me at 262-574-2135 or at amy.garbe@wisconsn.gov.

Thank you again,

Amy Garbe, P.E. Wastewater Engineer

Wisconsin Department of Natural Resources

CC. Kyle Minks – Dane County Brenda Howald – WDNR

