

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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September 10, 2018

Debra Ripton, Director of Ops
Nasco – Division of Aristotle
PO Box 901
901 Janesville Ave
Fort Atkinson WI 53538

Subject: NASCO WPDES Permit #WI-0058220
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Ms. Tipton:

Thank you for submitting the final draft of the Water Quality Trading (WQT) Plan on behalf of NASCO Division of Aristotle. The final plan was received on April 2nd, 2018 and additional items were received on June 29th, 2018. 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 NASCO will utilize Water Quality Trading to comply with the effluent limitations for TP for their discharge to the Rock River through trading with an upstream point source (City of Columbus) for Rock River TMDL allocations. The WQT Plan proposes the generation of 0.25 lbs/day of credits for a total of 91.25 lbs/yr of phosphorus credits for the next five years. This credit generation will be reflected in the applicable effluent limits.

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The WDNR has assigned the WQT plan a tracking number of WQT-2018-0006 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 NASCO 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@wisconsin.gov.

Thank you again,

Amy Garbe, P.E.
Wastewater Engineer
Wisconsin Department of Natural Resources

CC. Ryan Stenjem – Montgomery Associates