

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Waukesha Service Center
141 NW Barstow St, Room 180
Waukesha WI 53188

Scott Walker, Governor
Daniel L. Meyer, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



October 25, 2018

David Howell, Bemis Manufacturing Company
300 Mill Street
Sheboygan Falls, WI 53085

Subject: Bemis Manufacturing WPDES Permit #WI-0027456
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Howell:

The Department received the final draft of the Water Quality Trading (WQT) Plan prepared by The Probst Group on behalf of Bemis Manufacturing. The final plan, dated October 12th, 2018 was received on October 24th, 2018. 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 Wis. Stat 283.84. The WQT plan indicates that Bemis Manufacturing will utilize Water Quality Trading to comply with the effluent limitations for total phosphorus for their discharge from Plant D, outfall 001, to the Sheboygan River. The pollutant reduction will be achieved by converting agricultural fields to perennial vegetation per NRCS Technical Standard 327. The WQT Plan proposes the generation of a range of 188 lbs/yr to 339 lbs/yr of phosphorus 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 WDNR has assigned the WQT plan a tracking number of WQT-2018-0010 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 Bemis Manufacturing 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 608-264-9244 or email matthew.claucherty@wisconsin.gov.

Thank you again,

A handwritten signature in black ink that reads 'Matt Claucherty'. The signature is written in a cursive style.

Matt Claucherty
Water Resources Management Specialist
Wisconsin Department of Natural Resources

e-CC: Denise Bond – Bemis Manufacturing
Al Hendrickson – Bemis Manufacturing
Curtis Nickels – WDNR
Amy Garbe – WDNR
Amanda Perdsock – WDNR
Clair Ruenger – The Probst Group