

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
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July 26, 2019

Paul J. Spicer, WEC Energy Group  
231 W. Michigan Street  
Milwaukee, WI 53203

Subject: Wisconsin Electric Power Co – Paris Facility - WPDES Permit #WI-0049131  
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Spicer:

The Department recently received a finalized water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the WE Energies – Paris Facility. The initial plan was received in March of 2019 and an updated version was received on July 12, 2019. The Department has reviewed the 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 WE Energies - Paris will utilize Water Quality Trading to comply with the effluent limitations for total phosphorus for their discharge to the Des Plaines River through restoration of prairie and wetland perennial vegetation on roughly 36 acres of land. The WQT Plan proposes the generation of a range of 53.1 lbs/yr to 90.6 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-2019-0011 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)-264-9244 or at [matthew.claucherty@wisconsin.gov](mailto:matthew.claucherty@wisconsin.gov)

Thank You,

Matt Claucherty  
Water Resources Management Specialist  
Wisconsin Department of Natural Resources

e-CC: Alison Castronovo, WE Energies  
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