



January 3rd, 2023

Marsha Einsweiler, City Clerk
P.O. Box 580
Shullsburg, WI 53586

Subject: Shullsburg WWTF - WPDES Permit WI- 0028321
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Marsha Einsweiler:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Shullsburg WWTF. The initial plan was received in June of 2022 and an updated version was received in October of 2022. Based on WDNR review, the final WQT Plan (dated December 2022) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes installation of streambank stabilization practices. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus effluent limits.

Table 1: Total Phosphorus Credits Available per WQT-2023-0001

Year	Available Credits (lbs/yr) – Total
2023	107
2024	107
2025	107
2026	107
2027	107

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. This approval is not to be construed as an approval for any activities requiring a permit under ch. 30 or 31, Wis. Stats. The Department has assigned the WQT plan a tracking number of WQT-2023-0001 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 608-535-0368 or at sean.spencer@wisconsin.gov

Thank You,

A handwritten signature in black ink that reads "Sean Spencer". The signature is written in a cursive, flowing style.

Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:

Jordan Fure, Delta 3 Engineering
Jennifer Jerich, WDNR
Caitlin O'Connell, WDNR