

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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June 5, 2018

Brian Helminger
District Director
Heart of the Valley
Metropolitan Sewerage District
801 Thilmany Road
Kaukauna, WI 54130

RE: WDNR Review of HOV Water Quality Trading Plan; 801 Thilmany Road, Kaukauna, Wisconsin;
WPDES Permit: WI-0031232; HOV Trade number WQT-2018-0003

Dear Mr. Helminger:

On behalf of the Wisconsin Department of Natural Resources (WDNR), I am pleased to inform you that the WDNR has conditionally approved the report entitled, "Heart of the Valley Metropolitan Sewerage District Water Quality Trading Plan" [WQT Plan], dated March 14, 2018 prepared by the Fox Wolf Watershed Alliance (FWWA). The WQT Plan with revisions was received via email from you on June 1, 2018.

Based on the WDNR review, the WQT Plan is in general conformance with WDNR Water Quality Trading Guidance and Wis. Stat § 283.84. The WDNR's understanding is that Heart of the Valley Metropolitan Sewerage District (HOV) discharges from Outfall 001 approximately 6.5 MGD at a monthly average total suspended solids concentration of 12-15 mg/L. Based on data from 2012 through 2016, the WQT Plan calculates that Outfall 001 has the potential to contribute between 3,600 – 18,000 pounds of total suspended solids per year to the environment. The WQT Plan indicates that HOV will utilize Water Quality Trading to comply with the effluent limitations for total suspended solids (TSS) for their existing discharge to the Lower Fox River through the installation of permanent vegetative cover (totaling 3.6 acres) and the installation of one sediment basin (collecting drainage from a total of 20.7 acres) in which both practices will be located on one HOV owned field (parcel number 030014300, Outagamie County, WI) which is 40 acres in size. Through the installation of the two (2) practices, the WQT Plan proposes the generation of between 1,517 – 3,157 pounds of total suspended solids credits per year for the next five (5) years (after applying the trade ratio). The WQT Plan will need to be updated prior to the next permit expiration to quantify long term credits, since at this time, the WQT Plan only addresses 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 (through 2022) with the following comments.

The draft WPDES permit will include requirements for monthly inspections and certifications, annual trading reports and effluent monitoring. The WDNR will review the data provided by HOV to assess whether any additional modifications to the WQT Plan and associated water quality trades are required prior to reissuance of the following WPDES permit.

If you have questions regarding this matter, please contact me at phone number 920/303-5435 or by email KeithA.Marquardt@Wisconsin.gov.

Sincerely,



Keith Marquardt
Water Resource Management Specialist
Bureau of Water Quality
Wisconsin Department of Natural Resources

C: Dick Sachs, WDNR
Barti Oumarou, WDNR
Jessica Schultz, FWVA