



May 8, 2020

Keith Grell, Village President  
 Village of Stratford  
 PO Box 12  
 Stratford, WI 54484

Subject: Stratford Wastewater Treatment Facility - WPDES Permit WI- 0025569  
 Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Grell

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at the Stratford Wastewater Treatment Facility. The initial plan was received in September of 2019 and an updated version was received in February 2020. Based on WDNR review, the final WQT Plan (dated February 2020) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes conversion of agricultural cropland acres to a grassy hay conservation practice. The timeline for practice installation, as set forth in the WQT plan, indicates practices will be established by June 1<sup>st</sup>, 2022. 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 beginning June 1<sup>st</sup>, 2022.

As a condition of approval, please note the following:

Registered Practice – The original WQT plan included the credit generation from two separate fields, but indicated that if rotational averaging becomes an option, the conversion of “Field 2” will be the only registered practice necessary for this permit term.

Rotational Average – While rotational averages can be used in the credit calculation, the averaging period cannot extend beyond the expiration date of the reissued permit. Therefore, the projected credits from 2022 to 2024 were used for the rotational average.

Interim Credits – The interim credit contribution from this practice will expire by the end of 2031. Only reductions that are made below the credit threshold of 0.5 lbs/acre/year will be eligible as long term credit.

Table 1: Total Phosphorus Credits Available per WQT-2020-0007

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2020	0	0	0
2021	0	0	0
2022	202	14	216
2023	202	14	216
2024	202	14	216

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The Department has assigned the WQT plan a tracking number of WQT-2020-0007 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 715-225-4705 or at [benjamin.hartenbower@wisconsin.gov](mailto:benjamin.hartenbower@wisconsin.gov)

Thank You,

A handwritten signature in black ink, appearing to read "Bill", followed by a long horizontal line extending to the right.

**Benjamin Hartenbower, P.E.**  
Water Resources Engineer  
Wisconsin Department of Natural Resources

e-CC:

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