



March 22, 2019

Elizabeth McCredie, Administrator  
Village of Deerfield  
4 North Main St.  
PO Box 66  
Deerfield WI 53531

Subject: Village of Deerfield (WPDES WI-0023744)  
Adaptive Management Plan – Conditional Approval

Dear Ms. McCredie:

The Department received the final draft of the Adaptive Management (AM) Plan prepared by Town & County Engineering on behalf of the Village of Deerfield. The final plan dated February 2019, was received via electronic submittal on March 1, 2019. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the Village of Deerfield will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the Deerfield Wastewater Treatment Facility, Outfall 001, to an unnamed tributary of Mud Creek. Actions outlined in the AM plan involve nonpoint phosphorus reductions throughout the Mud Creek Watershed, identified as the AM plan's action area. For continued AM eligibility, phosphorus reductions undertaken by Deerfield WWTF and various AM partners are expected to offset the WWTF's proportional phosphorus loading to Mud Creek, 327 lbs/yr, within the first permit term.

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2019-0005 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The department appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at (262) 574-2135 or email [amy.garbe@wisconsin.gov](mailto:amy.garbe@wisconsin.gov).

Thank you,

Amy Garbe, P.E.  
Wastewater Engineer  
Wisconsin Department of Natural Resources

e-CC: Nathan Paoli – Deerfield  
Sean Spencer – WDNR  
Greg Droessler – Town & Country