

Notice: Pursuant to s. 283.84, Wis. Stats., and ch. NR 217 Wis. Adm. Code, this form must be completed by any WPDES permittee that is using water quality trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss 19.31 - 19.39, Wis. Stats.)

Applicant Information				
Permittee Name City of Fort Atkinson		Permit Number WI- 22489		Facility Site Number 128001500
Facility Address 1600 Farmco Lane			City Fort Atkinson	State WI
Project Contact Name (if applicable) Andy Selle, City Engineer			Address 101 N Main Street	City Fort Atkinson
			State WI	ZIP Code 53538
Project Name Fort Atkinson Wastewater Treatment Plant Modifications				
Receiving Water Name Rock River		Parameter(s) being traded TSS and Phosphorous		HUC 12(s) 0709000210

Is the permittee in a point or nonpoint source dominated watershed? Point source dominated
 (See PRESTO results - <http://dnr.wi.gov/topic/surfacewater/presto.html>) Nonpoint source dominated

Credit Generator Information		
Credit generator type (select all that apply): Fort Atkinson Wastewater Treatment Plant	<input checked="" type="checkbox"/> Permitted Discharge (non-MS4/CAFO) <input type="checkbox"/> Permitted MS4 <input type="checkbox"/> Permitted CAFO	<input type="checkbox"/> Urban nonpoint source discharge <input type="checkbox"/> Agricultural nonpoint source discharge <input type="checkbox"/> Other - Specify: _____

Are any of the credit generators in a different HUC 12 than the applicant? Yes; HUC 12: _____
 No

Unsure

Are any of the credit generators downstream of the applicant? Yes
 No

Unsure

Will a broker/exchange be used to facilitate trade? Yes; Name: _____
 No

Unsure

Point to Point Trades (Traditional Municipal / Industrial Discharge, MS4, CAFO)

Discharge Type	Permit Number	Name	Contact Address	Is the point source credit generator currently in compliance with their permit requirements?
<input checked="" type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO	S050075	City of Fort Atkinson	101 N Main Street Fort Atkinson WI 53538	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure
<input type="radio"/> Traditional <input type="radio"/> MS4 <input type="radio"/> CAFO				<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unsure

Point to Nonpoint Trades (Non-permitted Agricultural, Non-Permitted Urban, etc.)

List the practices that will be used to generate credits:

Method for quantifying credits generated: Monitoring
 Modeling, Names: _____
 Other: _____

Projected date credits will be available:

The preparer certifies all of the following:

- I am familiar with the specifications submitted for this application, and I believe all applicable items in this checklist have been addressed.
- I have completed this document to the best of my knowledge and have not excluded pertinent information.

Signature of Preparer <i>Timothy G. Whittaker</i>	Date Signed May 19, 2022
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Authorized Representative Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative <i>[Signature]</i>	Date Signed May 19, 2022
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Notice of Intent to Conduct Water Quality Trading Form 3400-206

Pollutant Trading Attachment

The City of Fort Atkinson is the operator of a Municipal Separate Storm Sewer System (MS4). As an MS4 operator the City is regulated by the Wisconsin Department of Natural Resources (WDNR) under Wisconsin Pollution Discharge Elimination System (WPDES) general permit WI-S050075-03. The permit requires compliance with administrative codes NR 216.07(6)(b) and NR 151.13. These codes require quantification of Total Suspended Solids (TSS) and Total Phosphorus (TP) in stormwater runoff from the municipality.

In 2018, MSA Professional Services completed the *Stormwater Quality Plan Update - Rock River TMDL Assessment* for the City of Fort Atkinson. This plan update quantified the TSS and TP total load and treated load within each of the City’s three TMDL reaches.

Pollutant trading is limited to within the same reach or downstream along the same waterbody. The City’s wastewater treatment plant is located in TMDL Reach 60, which is the most downstream of the City’s three reaches. That being the case, the excess pollutant treatment at the wastewater treatment plant can only be applied to the city’s MS4 in Reach 60. The results of the MS4 TMDL plan update for Reach 60 are summarized in Table 1.

Table 1 MS4 TMDL Reach 60 Pollutant Summary

	Total Suspended Solids (Tons)	Total Phosphorus (Lbs)
Total Pollutant Load	324	1999
TMDL Required Treatment Percentage	41%	48%
TMDL Required Treatment	133	960
MS4 Treated Load	19	596
MS4 Shortage	14	364

The City is currently completing an upgrade to the Wastewater Treatment Plant, Permit Number WI-22489, Facility Site Number 128001500. Permitting for this plant upgrade has quantified excess TSS and TP treatment provided by this facility upgrade. The excess pollutant treatment provided by the plant upgrade is summarized in Table 2.



Table 2 - Wastewater Treatment Plant Upgrade Excess Treatment

	Total Suspended Solids (Tons)	Total Phosphorus (Lbs)
Treatment Provided	32	1900

The results of pollutant trading between the wastewater treatment plant and the MS4 within Reach 60 are summarized in Table 3. The City will reserve the remaining excess pollutant treatment for potential future uses.

Table 3 - Pollutant Trading Results

	Wastewater Treatment Plant Excess	MS4 Shortage	Remaining Excess Treatment
Total Suspended Solids (Tons)	32	14	18
Total Phosphorus (Lbs)	1900	364	1536