

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Daniel L. Meyer, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



October 6, 2017

Andy Meinerz
Environmental Compliance Leader
Ashley Furniture Industries, Inc.
245 Ashley Way
Arcadia WI 54612

Subject: Superior Fresh, LLC WPDES Permit #WI-0065200-01
Water Quality Trading Plan – APPROVAL

Dear Mr. Meinerz:

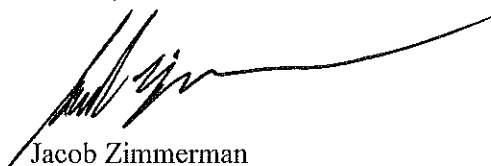
Thank you for submitting the final draft of the Water Quality Trading (WQT) Plan on behalf of the Superior Fresh, LLC. The initial plan was received on June 12th, 2017 and final revisions were received on October 6th, 2017. The Department has reviewed the additional documentation and final report and has no additional comments at this time.

Based on the WDNR review, the WQT Plan is in general conformance with the WDNR Water Quality Trading Guidance and s. 283.84, Wis. Stats. The WQT Plan indicates that Superior Fresh will discharge 18.4 million gallons per year from Outfall 001 at an average total phosphorus (TP) concentration of 0.65 mg/L. The WQT plan indicates that Superior Fresh will utilize Water Quality Trading to comply with the effluent limitations for TP for their new discharge to an unnamed tributary to Pigeon Creek. The WQT Plan utilizes streambank stabilization for the generation of 168 lbs/yr of phosphorus credits. These credits will be used for compliance with the WPDES permit effluent limits.

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring. WDNR will review the data provided by Superior Fresh to assess whether any additional modifications to the WQT Plan and associated water quality trades are required prior to reissuance of the next WPDES permit.

If you have any questions or comments, please contact me at 608-275-3230 or at Jacob.zimmerman@wisconsin.gov.

Thank you again,



Jacob Zimmerman

Ecc: Brandon Gottsacker, COO Superior Fresh, LLC
Pat Oldenburg, Water Resources Engineer, WDNR/Eau Claire