

I. Executive Summary -

This Water Quality Trading Plan summarizes the City of Mineral Point’s (City) plan to utilize Water Quality Trading (WQT) for compliance with the final total phosphorus limit as provided in the Wisconsin Pollutant Discharge Elimination System (WPDES) Permit #WI-0024791-09-0. The Wastewater Treatment Facility (WWTF) treated 0.394 MGD in 2019. The WWTF had an average effluent Total Phosphorus (TP) concentration of 0.32 mg/L. The WWTF is required to offset 294 lbs of TP to meet the final annual six-month average limit of 0.075 mg/L and a monthly average limit of 0.225 mg/L, which will become effective September 30, 2021.

NRCS Streambank Erosion modeling methods were used to calculate the total phosphorus credits that would be generated based on the installation of best management practices (BMPs). These credits will be used to demonstrate compliance with the final total phosphorus limit as proposed in the WPDES Permit. Modeling results are provided in Table 1.1.

Table 1.1 – Modeling Results

Stream Reach	Current Phosphorus Loading (lbs/yr)	Proposed Phosphorus Loading (lbs/yr)	Proposed Phosphorus Reductions (lbs/yr)	Trade Ratio	Proposed Phosphorus Credits
1 (Right)	82.0	0	82.0	2:1	41.0
1 (Left)	72.9	0	72.9	2:1	36.5
2 (Right)	74.1	0	74.1	2:1	37.0
2 (Left)	77.3	0	77.3	2:1	38.7
3 (Right)	60.5	0	60.5	2:1	30.3
3 (Left)	62.5	0	62.5	2:1	31.2
4 (Right)	48.4	0	48.4	2:1	24.2
4 (Left)	46.0	0	46.0	2:1	23.0
5 (Right)	24.5	0	24.5	2:1	12.2
5 (Left)	35.9	0	35.9	2:1	18.0
6 (Right)	73.8	0	73.8	2:1	36.9
6 (Left)	29.2	0	29.2	2:1	14.6
7 (Right)	4.9	0	4.9	2:1	2.5
7 (Left)	3.6	0	3.6	2:1	1.8
8 (Right)	265.8	0	265.8	2:1	132.9
8 (Left)	293.8	0	293.8	2:1	146.9
9 (Right)	115.5	0	115.5	2:1	57.8
9 (Left)	170.8	0	170.8	2:1	85.4
Total					770.9

Justification for Trade Ratio is provided below:

Trade Ratio = (Delivery + Downstream + Equivalency + Uncertainty – Habitat Adjustment):1

- Delivery = 0 (Trading within same HUC-12 Watershed)
- Downstream = 0 (All Trades are upstream of the Outfall 001)
- Equivalency = 0 (Not necessary of Total Phosphorus)
- Uncertainty:
Streambank Stabilization with Habitat Restoration = 2 (Brewery Creek is eligible for habitat restoration since it is classified as an impaired water)

As demonstrated in Table 1.1, the WWTF has the ability to register approximately 770.9 credits. The WWTF intends to perform construction of the streambank stabilization in phases to account for future loadings to the WWTF. The implementation of this WQT Plan will result in compliance with the final TP limits.

II. Background -

The purpose of this Water Quality Trading Plan (Plan) is to describe the City's use of Water Quality Trading to comply with the total phosphorus limits as provided in City's WPDES Permit #WI-0024791-09-0. The Plan was developed following the Notice of Intent to Conduct Water Quality Trading, provided in Attachment #1. The Water Quality Trading Checklist Form 3400-208 is provided in Attachment #2.

The City of Mineral Point is located in Iowa County adjacent to United States Highway '151' in southwest Wisconsin. The City operates and maintains its own public wastewater and water systems. The City is located in Sections 36, 1, 31, 32, 6, and 5, Town 4 and 5 North, Range 2 and 3 East of the Fourth Principal Meridian. The City has a population of 2,487 and contains one (1) service area, which is the City Proper. The City of Mineral Point Location Map is provided in Attachment #3.

The downtown portion of the City is comprised mostly of commercial and residential development and is situated along Brewery Creek. Industrial development is primarily located on the north end of the City. The City has many rolling hills with the grade sloping throughout the area anywhere from 5% to 15%. Elevations in the area range from approximately 940'± at the Wastewater Treatment Facility (WWTF) to 1138'± at the water tower, which is located at the intersection of Church Street and Ridge Street.

The existing sanitary sewer collection consists of 521 sanitary sewer manholes; ten (10) sanitary lamp holes; seven (7) sanitary lift stations; 90 feet of six-inch (6") sanitary sewer; 94,250 feet of eight-inch (8") sanitary sewer; 3,180 feet of 10" sanitary sewer; 1,500 feet of 12" sanitary sewer; 2,100 feet of 15" sanitary sewer; and 8,970 feet of four-inch (4") sanitary force main. The gravity sewer varies in composition between concrete, clay, and PVC. The manholes vary in composition between brick, block, and precast structures. As of August 1, 2016, the City had developed its Capacity, Management, Operation, and Maintenance (CMOM) Program according to Schedule 5.3.2 of the City's Wisconsin Pollutant Discharge Elimination System (WPDES) Permit. The CMOM Program is used for documenting operation and maintenance activities within the collection system.

The City of Mineral Point owns and operates a WWTF that utilizes a bio-tower treatment system. The facility consists of a mechanical screen, grit removal, primary clarifier, bio-tower, and secondary clarifier. Screenings and grit are disposed at a sanitary landfill. Sludge from the treatment process is anaerobically digested and stored prior to land application. Alum is used at the treatment facility for the removal of Phosphorus. Please refer to Attachment #4 for the flow schematic of the City of Mineral Point's WWTF. The City of Mineral Point's WWTF has one (1) receiving water and effluent discharge location, Outfall 001: Brewery Creek (Mineral Point Branch Watershed, SP09-Sugar-Pecatonica River Basin).

The monthly average influent and effluent flows and loadings at the WWTF for 2019 are shown in Table 2.1.

Table 2.1 – 2019 Monthly Averages

Month	Outfall	Flow	Phosphorus	Phosphorus
		MGD	mg/L	lbs./day
		Effluent	Effluent	Effluent
Jan. ('19)	001	0.323	0.20	0.54
Feb. ('19)	001	0.297	0.27	0.67
Mar. ('19)	001	0.534	0.16	0.71
Apr. ('19)	001	0.333	0.31	0.86
May ('19)	001	0.605	0.25	1.26
June ('19)	001	0.316	0.39	1.03
July ('19)	001	0.327	0.42	1.15
Aug. ('19)	001	0.204	0.26	0.44
Sept. ('19)	001	0.559	0.40	1.86
Oct. ('19)	001	0.560	0.35	1.63
Nov. ('19)	001	0.352	0.26	0.76
Dec. ('19)	001	0.321	0.61	1.63
Average =		0.394	0.32	1.05

To reduce effluent TP, the City has made efforts to optimize TP reduction at the WWTF. The City has also implemented source reduction measures such as investigating potential TP contributors. None of the businesses were determined to be substantial contributors for TP. The City tested Municipal Well #3 and Well #4 for TP and determined background TP was negligible. The City has attempted to optimize the WWTF and evaluated minor facility modifications. Since the bio-tower treatment system was not designed for effluent TP reduction, little to no benefits were achieved through optimization. The City has implemented chemical addition and evaluated Alum dosage rates to identify the optimal dosage. The City has determined that Alum alone will not satisfy final Effluent TP Limits.

Additionally, the City has investigated watershed compliance alternatives such as Water Quality Trading (WQT) and Adaptive Management (AM). Utilizing the results from PRESTO, the watershed for the City of Mineral Point's WWTF has a nonpoint source ratio of 4:96 and is considered to be nonpoint source dominated. Stream monitoring data for TP is not available on the Brewery Creek. The City should investigate background concentrations within the Brewery Creek to evaluate whether the stream is meeting the water quality criteria (WQC).

Following the initial watershed investigation, the City elected to move forward with WQT. The City intends to perform WQT projects within the City's HUC-12 #070900030103 as provided in Attachment #5. The Iowa County Land Conservation Department (LCD) has been contacted for possible WQT funding.

Flow and loading data from 2019 was utilized to determine credits needed. Annual effluent TP was estimated at 384 lbs. The final limit would allow annual discharge of 90 lbs. The City would be required to offset 294 lbs of effluent TP. Calculations for required WQT reductions are provided below.

1) The current annual Phosphorus loading discharged at the WWTF is calculated as follows:

Average Daily Flow (Q) = 0.394 MGD
Average Phosphorus concentration = 0.32 mg/L

$$0.32 \text{ mg/L} \times 0.394 \text{ MGD} \times 8.34 \times 365 \text{ days/yr.} = \mathbf{384 \text{ lbs./yr.}}$$

2) The proposed allowable annual Phosphorus mass limit at the WWTF is calculated as follows:

Average Daily Flow (Q) = 0.394 MGD
Proposed Seasonal Phosphorus Concentration Limit = 0.075 mg/L

$$0.075 \text{ mg/L} \times 0.394 \text{ MGD} \times 8.34 \times 365 \text{ days/yr.} = \mathbf{90 \text{ lbs./yr.}}$$

3) Reduction of Total Phosphorus required at WWTF -
 $384 \text{ lbs./yr.} - 90 \text{ lbs./yr.} = \mathbf{294 \text{ lbs/yr}}$

Utilizing a proposed 2:1 trade ratio, the required non-point source TP reduction would be 588 lbs./yr.

To provide an adequate safety factor for credits generated, the City will generate credits to meet the Maximum Monthly Phosphorus Discharge. The calculation for credits required to meet the Maximum Monthly Phosphorus Discharge is provided below:

Maximum Monthly Flow (Q) = 0.560 MGD
Average Phosphorus Concentration = 0.32 mg/L
Proposed Seasonal Phosphorus Concentration Limit = 0.075 mg/L

$$(0.32 - 0.075) \text{ mg/L} \times 0.560 \text{ MGD} \times 8.34 \times 365 \text{ days/yr.} = \mathbf{417 \text{ lbs/yr}}$$

Utilizing a proposed 2:1 trade ratio, the required non-point source TP reduction would be **834 lbs/yr.**

To generate the required 417 TP credits, the City intends to perform streambank stabilization. Streambank stabilization will utilize grading and riprap to prevent the erosion of sediment from the streambanks. Streambank stabilization will not only prevent sediment from entering the stream, but will also prevent phosphorus, nitrogen, and other pollutants from discharging to the Brewery Creek. Reducing pollutant discharge will restore stream habitat and generate water quality trading credits.

III. Location and Description of Credit Generation Sites –

The City discharges to the Brewery Creek (Mineral Point Branch Watershed, SP09-Sugar-Pecatonica River Basin) at Outfall 001. As mentioned previously, the City intends to perform WQT projects within the City's HUC-12 #070900030103. The City plans to implement BMPs to generate TP credits. Specifically, Streambank stabilization is planned along the banks of the Brewery Creek on the following properties:

- Parcels 251-0908, 2510907, and 251-0893.01
- Parcels 251-0355, 251-0357, 251-0359, 251-0360, 251-0361, and 251-0346
- Parcel 251-0362.A
- Parcels 251-0361.02 and 251-0362.B
- Parcel 018-0630
- Parcels 251-0346.017 and 251-0339
- Parcel 251-0352
- Parcel 251-0187
- Parcel 251-0188.B
- Parcels 251-0188.04 and 251-0344.01
- Parcel 251-0188.C
- Parcel 251-0190
- Parcels 251-0344 and 251-0341
- Parcels 251-1040, 251-1041, 251-1006, 251-1042, and 251-1123
- Parcel 018-0462.01

See Figure 3.1 and Figure 3.2 for additional project location information.

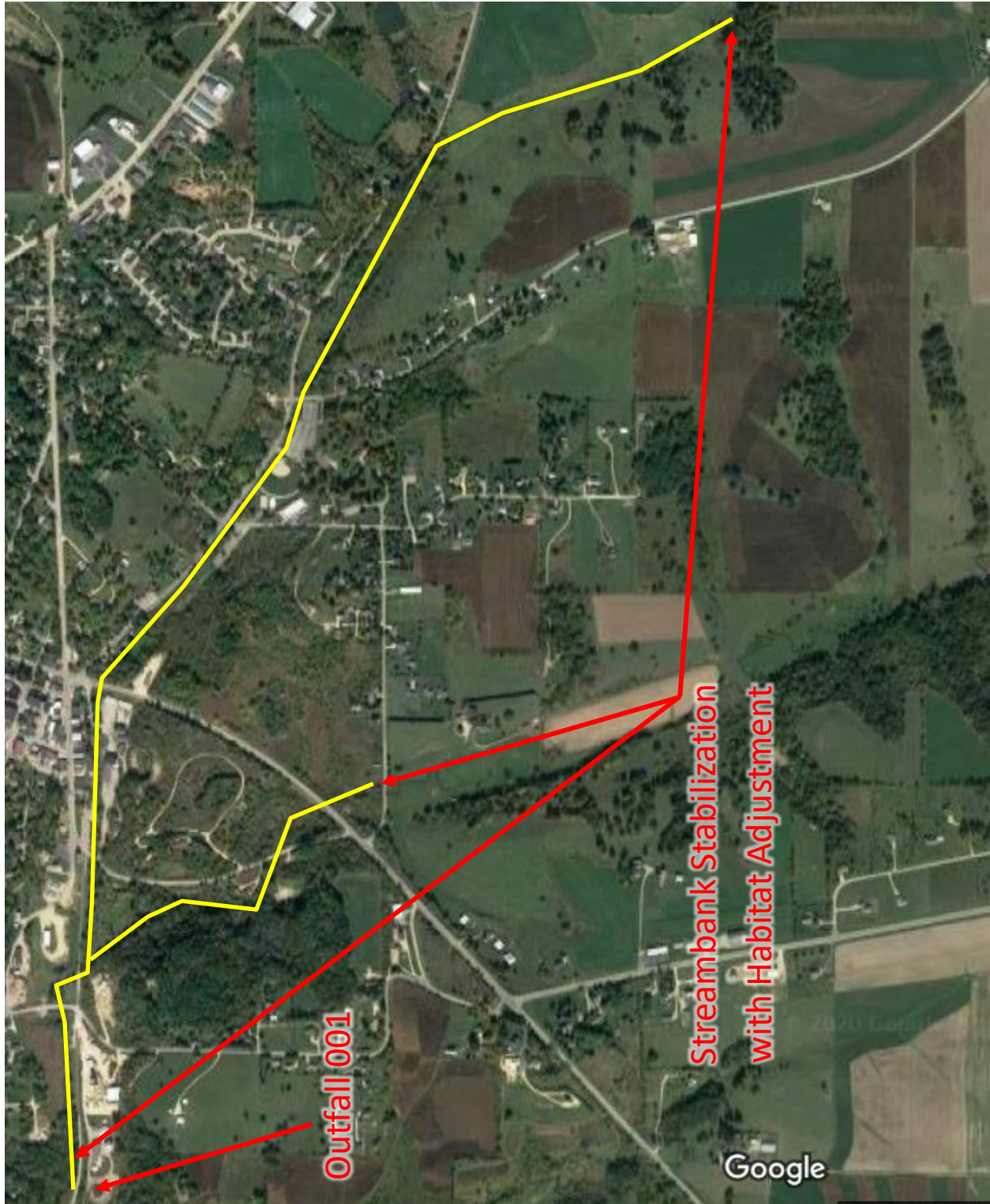


Figure 3.1 – Streambank stabilization locations in relation to Outfall 001.

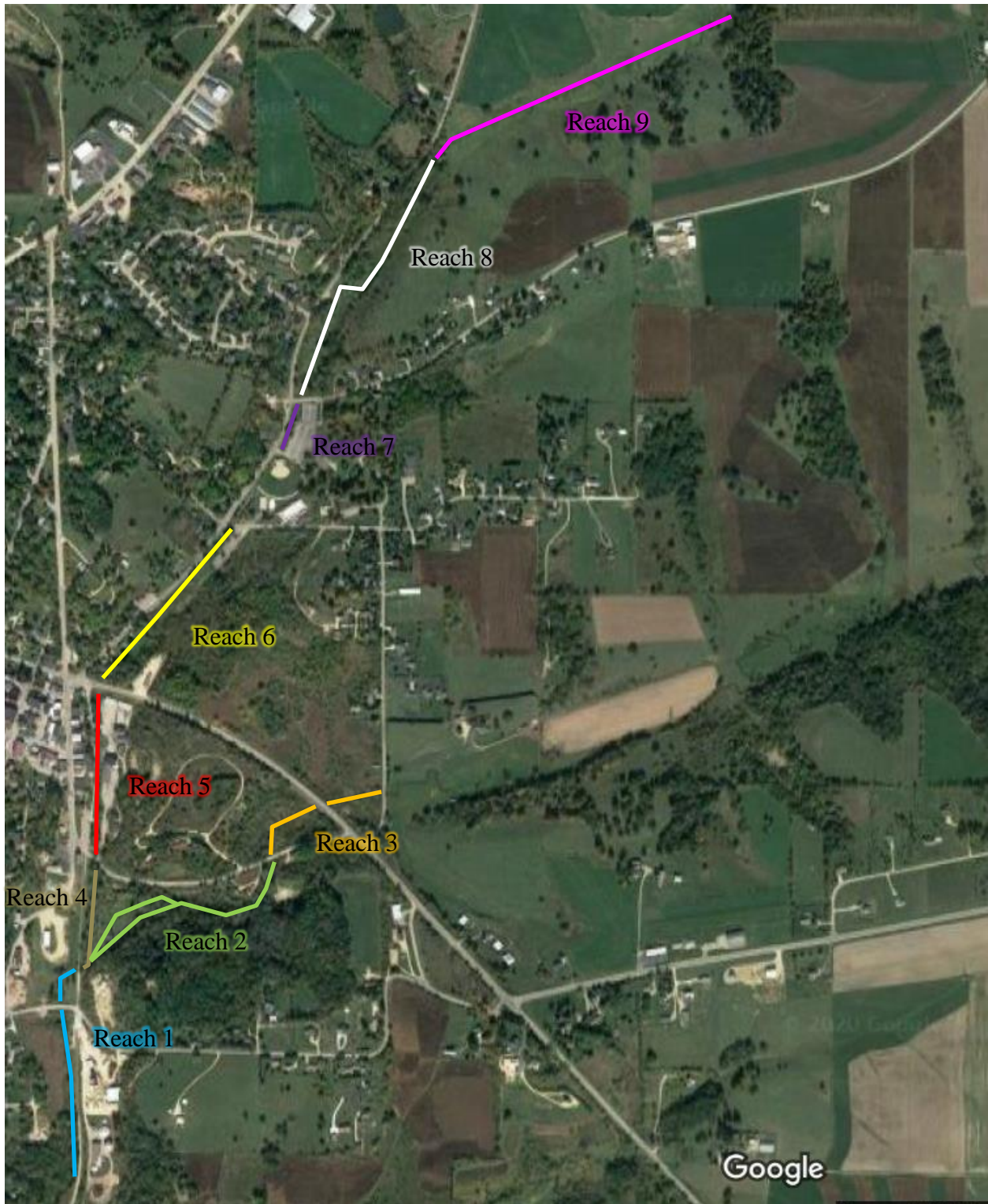


Figure 3.2 – Streambank stabilization locations.

IV. Methods for Nonpoint Source Load Reduction –

The City would like to acquire at least 417 WQT trading credits to serve as insurance in the event that effluent credits are lost or the WWTF discharges additional mass of TP. The Plan identifies trading practices that will reduce TP runoff by 1,1542 lbs and will utilize a 2:1 trade ratio. The WQT practices identified for this Water Quality Trading Plan will generate approximately 771 TP credits/year indefinitely as long as trading practices are maintained.

A. Methods Used to Generate Load Reductions

For streambank stabilization, City plans to generate TP load reductions through streambank grading with minor riprapping as needed for approximately 14,240' of streambank. Streambank Stabilization will be performed as per NR 328 *Shore Erosion Control Structures in Navigable Waterways*, NRCS 580 *Streambank and Shoreline Protection*, and NRCS 395 *Stream Habitat Improvement and Management*. Riprapping the streambank in high energy locations will better protect the streambank as compared to grading alone. The streambank stabilization project will occur within HUC-12 #070900030103 in order to generate TP credits. A Plan of the grading and riprap implementation is provided in Attachment #6.

The City is contracted with Bart Nies, PE/Owner for Delta 3 Engineering, Inc. to design the BMPs and prepare the plans, specification, and operation and maintenance manual. The City will acquire all required permits and authorizations prior to construction. To register credits, the City has entered into trade agreements with Property Owners A and B pursuant to *s. 283.84(1)(b), Wis. Stats.*

B. History of Project Site

Mineral Point is located within the Southwest Savanna ecological landscape. The City was settled in 1827 and has undergone significant development. Currently, the land use within the watershed is a mix of commercial, residential, undeveloped, and pasture. The commercial and residential areas consist of manicured lawns, impermeable surfaces, and storm sewer. The undeveloped areas typically consist of forest, wetland, and savannah ecosystems. Pastured areas consist of short grass with minimal trees. Existing trees are primarily boxelder, willow, and cottonwood. The streambanks have experienced significant erosion as the Brewery Creek Watershed has been developed and cleared for agricultural and residential use. The banks are predominately undercut with some rills and vegetative overhang. Tree roots are readily visible throughout the reaches. Fallen trees and slumps are also visible in areas. Recession rates for each Reach along with documentation regarding existing condition were estimated in Attachment #7.

C. Model Used to Derive Load Reductions

NRCS Streambank Erosion modeling methods were used to calculate the total phosphorus credits that would be generated based on the installation of BMPs. These credits will be used to demonstrate compliance with the final total phosphorus limit as proposed in the WPDES Permit. Modeling results are provided in Table 4.1.

Table 4.1 – Modeling Results

Stream Reach	Current Phosphorus Loading (lbs/yr)	Proposed Phosphorus Loading (lbs/yr)	Proposed Phosphorus Reductions (lbs/yr)	Trade Ratio	Proposed Phosphorus Credits
1 (Right)	82.0	0	82.0	2:1	41.0
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Justification for Trade Ratio is provided below:

Trade Ratio = (Delivery + Downstream + Equivalency + Uncertainty – Habitat Adjustment):1

- Delivery = 0 (Trading within same HUC-12 Watershed)
- Downstream = 0 (All Trades are upstream of the Outfall 001)
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- Uncertainty:

Streambank Stabilization with Habitat Restoration = 2 (Brewery Creek is eligible for habitat restoration since it is classified as an impaired water)

Soil testing has been completed to determine TP concentrations within the soil. Soil sampling was performed every 100 feet and included the use of a soil sampler which pulled ¾” cores at 8” depth. Approximately six (6) cores were taken at each sampling location to provide a representative sample. Soils maps and soil testing data is provided in Attachment #8. Soil sample locations are provided in Attachment #6. An onsite evaluation has been conducted to estimate stream bank recession rate. The streambank has also been surveyed horizontally and vertically via Global Position System (GPS) Equipment. The survey data, narrative, and photos documenting the current state of eroding stream banks is provided in Attachment #7.

With the collected data, the NRCS Streambank Erosion Model was used to calculate TP loss from each reach of the eroding streambank. The modeling data for the NRCS

Streambank Erosion Model is available in Attachment #9. The designed streambank stabilization grading and riprap will eliminate streambank recession thus eliminating TP inputs due to streambank recession in planned areas. For the Habitat Restoration portions of the WQT Plan, the City has been in contact with the DNR Fisheries Biologist for Iowa County for direction regarding stream habitat improvements. The City will submit the final design plans and specifications to the DNR for approval. TP Credits will be registered following construction of the BMPs.

If the Plan or model inputs change, the City will submit to the DNR the revised models and calculations to more accurately reflect and number of credits generated.

D. Stream Habitat Improvements

As provided in NRCS 395 Stream Habitat Improvement and Management, the definition of *stream habitat improvement and management* is to maintain, improve physical, chemical, and biological functions of a stream, and its associated riparian zone, necessary for meeting the life history and requirements of desired aquatic species. The goal of stream habitat improvements within this Plan is to provide suitable habitat for desired fish and other aquatic species as well as provide riparian condition that maintain the stream corridor ecological processes which supports diverse stream habitat and aquatic species.

Prior to designing stream habitat improvements, the current conditions of the Brewery Creek and surrounding land uses were evaluated. The Brewery Creek watershed is dominated by urban development and livestock production practices. The Brewery Creek experiences significant storm water runoff issues including flooding, increased bank erosion, sedimentation, and limited riparian habitat. This is primarily caused by residential agricultural development within the watershed. The Brewery Creek is listed on State of Wisconsin 2018 Impaired Waters List due to degraded biological community and chronic toxicity due to lead and zinc. This contamination is due to the areas historic mining background and the mine waste piles that remain.

The Brewery Creek is a cold-water aquatic community. At the Outfall 001, the stream is classified as Limited Aquatic Life (LAL). Limited fishing opportunities are available on the Brewery Creek; however, brown trout were found in Brewery Creek even though the stream is not stocked. Brewery Creek is comprised primarily of hard substrates consisting of rubble/cobble or broken bedrock along with some silt substrates. Brewery Creek has one of the lowest width-to-depth ratios in the Mineral Point Branch watershed. Pools are scarce throughout and is a major contributor to limited fish numbers and species diversity. Additionally, perched culverts limit upstream mobility of aquatic organisms. The City is working with Justin Haglund (DNR Fisheries Biologist) for incorporation of in-stream habitat improvements with the Project Plans and Specifications.

E. Operation and Maintenance

An Operation and Maintenance (O&M) Plan is provided in Attachment #10. The O&M plan describes in how the Stream Stabilization Practices will be operated and maintained. The O&M Plan also addresses response procedures for Practice

Registration, Noncompliance Notification, and Notification of Trade Agreement Termination.

As previously mentioned, City is planning to perform streambank stabilization by installing rip-rap along approximately 14,240' of streambank. The stabilization practices will be installed and maintained as per NR 328 *Shore Erosion Control Structures in Navigable Waterways*, NRCS 580 *Streambank and Shoreline Protection*, and NRCS 395 *Stream Habitat Improvement and Management*. Restoration landscaping and seeding will be installed following construction and will be closely monitored for a minimum of two (2) growing seasons to ensure the new seeding grows and erosion is not prevalent. The City should also address weed and invasive vegetation growth if present. The riprap will be inspected following heavy rain events at a minimum. Inspection will be used to determine appropriate actions in order to maintain the riprap for continuous and ongoing streambank stabilization and TP credit generation.

The BMPs will be inspected annually by a licensed Professional Engineer to ensure that the BMPs are functioning as intended in order to meet the requirements of this WQT Plan.

V. Trade Timeline –

Schedule for Installation of the above mentioned trading practices for Total Phosphorus Credit Generation for TP compliance is provided in Table 5.1 below.

Table 5.1 – Trade Timeline

Item	Completion Date
Site Investigation	March 31, 2019
Conceptual Design	September 30, 2019
Final Design	June 30, 2020
Construction Permits	June 30, 2020
DNR Review of Final Design	August 31, 2020
Construction of BMPs	Fall, 2020
Phosphorus Credit Registration	June 30, 2021
Use of Phosphorus Credits by City of Mineral Point (Ongoing for Permit Compliance)	September 30, 2021

The City has been in contact with the DNR Water Regulation & Zoning Senior Specialist for Lafayette County who has provided guidance for required permits for the WQT Plan. At this time, no permitting issues have arisen to hinder the Project Progress. Credits will be used by the City beginning 9/30/2021. Credits will continue as long as the trading practices are maintained as outlined in this WQT Plan.

VI. Inspection Reporting –

A. Tracking Procedures

The City will track credits used monthly. The City will report credit usage to the DNR on a monthly basis in the Discharge Monitoring Reports (DMRs). The annual report will summarize the 12 months of credit usage and credit generation. The City will report to DNR any concern that they have that may result in a need to modify the trade agreement and/or this trade plan. For example, a need to generate additional credits based on discharge.

B. Inspection

Inspection of the BMPs shall occur during construction phase to ensure they are installed per the design and meet all applicable codes and permits. Once completed, inspections of the established BMPs shall occur each month at a minimum or following heavy rain events. A licensed professional engineer will perform an annual certification to ensure the practice is performing as designed and the City remains in compliance.

The inspection reports will include:

- i. Name and contact information of the inspector
- ii. Inspection Date
- iii. Relevant standards set forth in the Design Plan or Operation and Maintenance Plan
- iv. Issues identified
- v. When and how any issues identified were addressed
- vi. When and how any issues identified will be addressed in the future

Inspection reports generated during each routine or after rain event inspection will be included with the Annual Water Quality Trading Report submitted by the City to DNR. Annual inspections by a professional engineer will typically occur in April or May. This time of year is ideal for evaluating the condition of BMPs as it follows the freeze/thaw which poses the greatest potential for changes to the BMPs. Minimal vegetation cover will allow for adequate visual inspection.

C. Management Practice Registration Form

The City will file a completed registration form 3400-207 for Water Quality Trading Management Practice Registration separately from this Plan.

D. Annual Water Quality Trading Report Submittal

The following shall be submitted to the DNR by January 31 of each year:

- i. The number of pollutant reduction credits (lbs/month) used each month of the previous year to demonstrate compliance;
- ii. A summary of the annual inspection of the practice that generated any of the pollutant reduction credits used during the previous year, this inspection shall be completed by a licensed Professional Engineer;
- iii. All monthly inspection reports;

- iv. Identification of noncompliance or failure to implement any terms or conditions of this permit with respect to water quality trading that have not been reported in discharge monitoring reports;
- v. A list of all noncompliance and the correction measures and timing to address the issues throughout the year; and
- vi. An updated WQT plan if management practices have or will change.

E. Monthly Certification of Management Practices

Each month, the City will certify that the BMPs are maintained and operating in a manner consistent with this Water Quality Trading Plan or provide a statement noting noncompliance with this Plan. The monthly Discharge Monitoring Report (DMR) will include the following statement as a certification of compliance when the Credit Generating Practice is operating in a manner consistent with the Plan:

“I certify that to the best of my knowledge that the management practices identified in the approved water quality trading plan as the source of phosphorus credits is installed, established and properly maintained.”

F. Notification of Failure to Generate Credits

The City will notify DNR by telephone call to DNR’s regional wastewater compliance engineer within 24 hours or next business day of becoming aware that phosphorus credits used or intended for use by City are not being generated as outlined in this Water Quality Trading Plan.

The City will submit a written notification within five days after the City recognizes that the phosphorus credits are not being generated as outlined in the Trading Plan. DNR may waive the requirement for submittal for a written notice within five days and instruct the City to submit the written notice with the next regularly scheduled monitoring report required by City’s WPDES Permit.

The written notice will contain a description of how and why the TP credits are not being generated as outlined in the Water Quality Trading Plan, the steps taken or planned to prevent reoccurrence of the identified problems and the length of time anticipated it will take to address the issue.

The City will work to rectify the problem as laid out in the Operation and Maintenance Plans.

G. Conditions under which Management Practices May Be Inspected

Any DNR authorized officer, employee, or representative has the right to access and inspect the credit generating practice so long as the City’s trade agreement with the property owner(s) and this Water Quality Trading Plan remain in effect.

VII. Certification –

The undersigned hereby certifies that this Water Quality Trading Plan is accurate and correct to the best of his knowledge.

City of Mineral Point Wastewater Treatment Facility

By: _____

Jason Basting
Mayor
City of Mineral Point
137 High Street, Suite 1
Mineral Point, WI 53565
Telephone: (608) 987-2361
Email: mpmayor@cityofmineralpoint.com