City of
BELOIT, Wisconsin

DEPARTMENT OF PUBLIC WORKS
UTILITIES AND ENGINEERING FACILITY
2400 Springbrook Court, Beloit, WI 53511
www.ci.beloit.wi.us

March 18, 2015

Phillip Spranger
Wisconsin Department of Natural Resources
SCR Headquarters
3911 Fish Hatchery Road
Fitchburg, WI 53711

Re: Wisconsin Pollutant Discharge Elimination System Permit No. WI-0023370
Comments on Draft Permit

Dear Mr. Spranger:

Following are the City of Beloit's (City's) comments on the public noticed version of our draft permit.

1. Page 5 of the permit lists our daily maximum ammonia limit as 17 mg/L and requires a daily sample frequency. Using the last five years of data we calculated our 1-day P99 for ammonia to be 6 mg/L. Based on this, there does not appear to be the potential to exceed the 17 mg/L limit and we ask that it be removed from the permit. If this is not possible, we request the sample frequency be reduced to quarterly, similar to the sample frequency for parameters that are "monitor only" such as other nitrogen series and metals parameters.

2. We agree that the phosphorus compliance schedule should be at least 9 years as outlined on pages 16 through 18 of the draft permit. The proposed limits are very stringent and the City will need as much time as possible to fully review the compliance options noted in the draft permit, to complete planning, to design and construct a tertiary treatment system if that is the selected compliance option, and to evaluate funding options.

Thank you for your consideration of these comments, and please let us know if you would like to meet to discuss them.

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Sincerely,

City of Beloit

HMathos

Harry Mathos
Director of Water Resources

C: Greg Boysen, P.E., Public Works Director
Jane M. Carlson, P.E., Strand Associates, Inc.

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