



June 7th, 2021

Tim Krueger, Director of Operations
N11689 Dairy Road
Brownsville, WI 53006

Subject: Grande Cheese Brownsville - WPDES Permit WI- 0050016-09
Water Quality Trading Plan – CONDITIONAL CREDIT CERTIFICATION

Dear Mr. Krueger:

Thank you for submitting the final draft of the Water Quality Trading (WQT) Plan. The final documentation was received on November 24, 2020. Based on the WDNR review, the WQT Plan is in general conformance with the WDNR Water Quality Trading Guidance and Wis. Stat 283.84. The WDR grants a conditional certification of the credits with the credits becoming certified once the facility submits their final WQT plan that identifies enough credits needed to offset the entire amount of phosphorus discharged by the facility.

The WQT Plan indicates that Grande Cheese Brownsville will utilize Water Quality Trading to comply with the effluent limitations for TP for their discharge to Kummel Creek. The WQT Plan proposes to utilize taking cropland out of production and into permanent vegetative cover for the generation of 188.74 lbs./yr. of phosphorus credits. These credits will be used for compliance with the WPDES permit effluent limits. The table below summarizes the total generated phosphorus credits. These credits are generated and expire on a calendar year basis.

Project	Reduction	Trade Ratio	Credits*
Field A	1.83	1.2:1	1.52
Field B	224.6	1.2:1	187.2
Total			188.74 lbs/yr

*In the event that this permit is not reissued prior to expiration, 188.74 lbs/yr of credit will be available in subsequent year(s).

The WDNR certifies the credits in this WQT Plan as a basis for water quality trading during the WPDES permit term. Please note that the credits generated by fields A and B are based on the current agricultural management of the tributary areas. Changes in management, including cropping and tillage practices, that differ from those documented within the SnapPlus model, will require an evaluation to ensure that the changes do not impact the number of credits generated.

The WDNR has assigned the WQT Plan a tracking number of WQT-2021-0002 which will be referenced as such in the draft WPDES permit. The final WQT plan will be included as part of the public notice package for permit reissuance. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring. WDNR will review the data provided by Grande Cheese Brownsville 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. Any modifications to the WQT Plan within the permit term will also require a modification to the permit and a public notification period.

If you have any questions or comments, please contact me at 608-535-0368 or at sean.spencer@wisconsin.gov

Thank You,

A handwritten signature in black ink that reads "Sean Spencer". The signature is written in a cursive, flowing style.

Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:

Lynn Morrison, The Probst Group
Jonathan Hill, WDNR
Thomas Meronek, WDNR