



August 7, 2019

Gustavo Badino
Vice President
BelGioioso Cheese, Inc.
4200 Main Street
Green Bay, WI 54311

RE: WDNR Review of Water Quality Trading Plan; BelGioioso Cheese Inc. – Freedom, WI, N4056 Vine Road, Freedom, Wisconsin; WPDES Permit No. WI-0066176-01-0; WQT No. WQT-2019-0724

Dear Mr. Badino:

On behalf of the Wisconsin Department of Natural Resources (WDNR), I am pleased to inform you that the WDNR has conditionally approved the report entitled, “BelGioioso Cheese Inc. – Freedom, WI, Water Quality Trading Plan – Rev 1” dated July 24, 2019 [WQT Plan] prepared by The Probst Group. The WQT Plan was received via email from Lynn Morrison of The Probst Group on July 30, 2019.

Based on the WDNR review, the WQT Plan is in general conformance with WDNR Water Quality Trading Guidance and Wis. Stat § 283.84. The WDNR’s understanding is that BelGioioso Cheese, Inc. (BelGioioso) will discharge from Outfall 001 an average yearly design flow rate of approximately 0.241 MGD at a phosphorus concentration of 0.04 – 0.06 mg/L; and a total suspended solids (TSS) concentration of 0.67 – 1 mg/L. The WQT Plan calculates that Outfall 001 will contribute between 36 to 53 pounds of phosphorus per year and 880 pounds per year of TSS to the environment. The WQT Plan indicates that BelGioioso will utilize Water Quality Trading to comply with the effluent limitations for total phosphorus (TP) and TSS for their new discharge to Duck Creek through the installation of permanent vegetative cover (totaling 36.9 acres) on three (3) BelGioioso owned fields located in Outagamie County, WI. The WQT Plan proposes the generation of between 40 and 59 pounds/year of total phosphorus interim credits (after applying the trade ratio) and between 1,292 and 23,281 pounds/year of TSS interim credits for the next five (5) years (2019 through 2024).

The WDNR conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term with the following comments.

The WPDES permit will include requirements for monthly inspections and certifications, annual trading reports and effluent monitoring. The WDNR will review the data provided by BelGioioso to assess whether any additional modifications to the WQT Plan and associated water quality trades are required prior to reissuance of the following WPDES permit.

BelGioioso, Midwest Prairies, and WDNR staff shall continue to perform inspections of the three (3) trade fields until the final proposed vegetation is established at the site. [Based on visual observations made by WDNR staff during a 07/18/19 site inspection of the three (3) trade fields, the site is consistent

with the WQT Plan and specifically the Establishment Plan; however, the proposed prairie plants as outlined in the WQT Plan are not yet established at the site.] In addition, BelGioioso is to provide the WDNR with SNAP Plus nutrient management plans for the land application sites.

If you have questions regarding this matter, please contact me at phone number 920/303-5435 or by email KeithA.Marquardt@Wisconsin.gov.

Sincerely,

Keith Marquardt
Water Resource Management Specialist
Bureau of Water Quality
Wisconsin Department of Natural Resources

Electronic Copy:

Matt Krueger, BelGioioso Cheese, Inc.
Lynn Morrison, The Probst Group
Roy Van Gheem, WDNR
Matt Claucherty, WDNR
Jason Knutson, WDNR
Jonathan Hill, WDNR