



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

November 2, 2018

RE: WDNR Review of Water Quality Trading Plan; BelGioioso Cheese - Chase, 7700 N. Brown County Line Road, Pulaski, Wisconsin; WPDES Permit No. WI-0065579-01-0; WQT No. WQT-2018-00012

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. – Chase, WI, Water Quality Trading Plan – REV3" [WQT Plan], dated November 1, 2018 prepared by The Probst Group. The WQT Plan was received via email from Mark Pronley of The Probst Group on November 1, 2018.

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 005 approximately 0.483 MGD at a phosphorus concentration of 0.1 – 0.14 mg/L. The WQT Plan calculates that Outfall 005 will contribute between 44 to 114 pounds of phosphorus per year to the environment. The WQT Plan indicates that BelGioioso will utilize Water Quality Trading to comply with the effluent limitations for total phosphorus (TP) for their new discharge to an unnamed tributary to the North Branch of the Little Suamico River through the installation of permanent vegetative cover (totaling 38.2 acres) on three (3) BelGioioso owned fields located in Oconto County, WI. The WQT Plan proposes the generation of between 119 and 221 pounds of total phosphorus credits per year (after applying the trade ratio) for the next five (5) years (2019 through 2023).

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 more frequent 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 10/26/18 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 and a portion (0.5 to 1.5 acres) of the 38.2 acres was void of vegetation.] In addition, BelGioioso is to provide the WDNR with SNAP Plus nutrient management plans for the land application sites by March 31, 2019.

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.
Mark Pronley, The Probst Group
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