State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Green Bay Service Center
2984 Shawano Avenue
Green Bay, WI 54313-6727

Tony Evers, Governor
Secretary
Telephone (920) 662-5100
Toll Free 1-888-936-7463
TTY Access via relay - 711

July 31, 2024

John J. Pagel
Operations Manager
Dairy Dreams LLC
N4893 Hwy C
Kewaunee, WI 54216
//sent electronically//

Subject: Dairy Dreams LLC (E3576 Cardinal Rd, Casco, WI)
WPDES Permit WI- 0062057-05-0
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Pagel:

The Department received an updated water quality trading plan (WQT Plan) for compliance with total phosphorus (TP) and Total Suspended Solids (TSS) effluent limits at the Dairy Dreams LLC Facility on July 25, 2024. This update was made due to comments that were received during the public comment period for the permit. The WQT Plan and SnapPlus model were updated to reflect existing site conditions more accurately where manure applications do not take place on portions of the fields. The initial plan was received on May 15, 2023 (dated May 5, 2023), and updated versions were received on June 15, 2023 (dated May 5, 2023, revisions with additional material), July 28, 2023, October 10, 2023, November 9, 2023, January 5, 2024 (dated December 15, 2023), and July 25, 2024 (dated July 23, 2024). Based on WDNR review, the final WQT Plan (dated July 23, 2024) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes.

The WQT Plan indicates the facility will need 9.2 lbs/year of TP and 461 lbs/year of TSS, and as a result the WQT Plan details conversion of 13.1 acres of cropland into conservation cover (NRCS Technical Standard 327). No nutrients will be applied to the field and vegetation will not be harvested. The timeline for practice installation, as set forth in the WQT Plan, indicates that the practices were installed in June 2024. The field was inspected by the department on July 31, 2024, and conservation cover establishment was observed and approved. Credits generated from these practices will result in available credit quantities shown in Table 1. The WQT Plan proposes the generation of 9.3 pounds of total phosphorus credits per year and 466 pounds of TSS credits per year for the five-year period of 2024 through 2028. These credits will be incorporated into the revised WPDES permit and will be used to demonstrate compliance with final phosphorus and TSS effluent limits.

As a condition of approval, please note the following:

- After the facility starts to discharge, if data shows that TP or TSS effluent values are greater than anticipated, the department will modify the permit credits accordingly and/or take appropriate actions.

- The WPDES permit will include requirements for monthly inspections and certifications, annual trading reports, and effluent monitoring.

- Annual SNAP Plus reports are required to verify nutrients being applied to remaining fields.

Table 1: Total Phosphorus and TSS Credits Available per WQT-2024-0017.

Year	Available TP Credits (lbs/yr) – Interim	Available TP Credits (lbs/yr) – Long Term	Available TP Credits (lbs/yr) – Total	Available TSS Credits (lbs/yr) – Interim	Available TSS Credits (lbs/yr) – Long Term	Available TSS Credits (lbs/yr) – Total
2024*	-	3.9	3.9	-	195	195
2025	-	9.3	9.3	-	466	466
2026	-	9.3	9.3	-	466	466
2027	-	9.3	9.3	-	466	466
2028	-	9.3	9.3	-	466	466

*Available credits in 2024 are based on conservation cover being established by August 1, 2024.

The Department conditionally approves the WQT Plan as a basis for water quality trading during the revised WPDES permit term. This approval is not to be construed as an approval for any activities requiring a permit under ch. 30 or 31, Wis. Stats. The Department has assigned the WQT Plan a tracking number of WQT-2024-0017 and will be referenced as such in the revised WPDES permit. The final WQT Plan will be included as part of the public notice package for permit reissuance. The revised WPDES permit will include requirements for annual trading reports and effluent monitoring for total phosphorus and TSS.

If you have any questions, please contact me (Laura Gerold) at (920) 366-6728 or email at laura.gerold@wisconsin.gov.

Thank You,

Laura A. Gerold

Laura Gerold, PE
Wastewater Engineer
Wisconsin Department of Natural Resources

e-CC:
Jeff LaViolette, NPR Environmental Consultants, Inc.
Dave LaCrosse, Pagels Ponderosa Dairy
Keith Marquardt, WDNR
Matt Claucherty, WDNR
James Salscheider, WDNR
Heidi Schmitt Marquez, WDNR
Joe Baeten, WDNR