State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Eau Claire, WI 54701

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April 9, 2025

Matt Bendixen
Grassland Dairy
N8790 Fairground Ave
Greenwood, WI 54437

Subject: Grassland Dairy Products WWTF WPDES Permit #WI-0002984
Water Quality Trading Plan – CONDITIONAL CREDIT CERTIFICATION

Dear Mr. Bendixen,

The Wisconsin Department of Natural Resources (department) received a final draft of the updated water quality trading plan (WQT Plan) for compliance with phosphorus effluent limits at Grassland Dairy Products Facility on 03/26/2025. Based on department review, the final WQT Plan is in general conformance with the department Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes generation of phosphorus credits via conversion of cropping land to permanent grassland, and the addition of filter strips. Credits generated from approved practices result in available credit quantities shown in Table 1. The practices are anticipated to be established by September 2025 and credits have been prorated for the year 2025 to reflect this. These credits will be incorporated into the WPDES permit via modification and will be used to demonstrate compliance with final phosphorus effluent limits in the reissued permit. If credits are not established by the anticipated date less credits may be available to the facility for use until practices are established.

*In the event that the permit is not reissued prior to the expiration date, annual available TP credits listed below will be available in the subsequent year(s).

Table 1: Total Phosphorus Credits Available per WQT-2025-0008

Year	Available TP Credits Total (lbs/yr)
2025	82
2026	244
2027	244
2028	244
2029	244*

The department conditionally certifies the WQT Plan as a basis for water quality trading during the next WPDES permit term. A condition of this certification is that prior to being implemented into the WPDES permit Grassland Dairy must enter into a signed written legal agreement with the department or Four Star Dairy. This certification will be rescinded if an agreement cannot be reached.

The department has assigned the WQT plan a tracking number of WQT-2025-0008 and 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 for total phosphorus. 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 715-492-4323 or at jenna.monahan@wisconsin.gov

Thank You,

Jenna Monahan

Jenna Monahan, P.E.
Wastewater Engineer - West Central Region
Wisconsin Department of Natural Resources

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