yState of Wisconsin
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November 1, 2024

Scott Theunis
Farm Manager
Tinedale Farms LLP
2768 Poplar St.
Wrightstown, WI 54180
//sent electronically//

Subject: Tinedale Farms LLP
WPDES Permit WI- 0058947-05-1
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Theunis:

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 Tinedale Farms LLP Facility. The initial plan was received on September 6, 2023, and updated versions were received on January 31, 2024, April 3, 2024, May 31, 2024, and July 31, 2024 (with supplemental material submitted afterwards). Based on WDNR review, the final WQT Plan (dated July 31, 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 4.9 lbs/year of TP and 245 lbs/year of TSS assuming an average yearly flowrate of 40,259 gallons per day, and as a result the WQT Plan proposes conversion of 31.1acres of cropland into conservation cover (NRCS Technical Standard 327), which will not be harvested or receive nutrient applications. The practices were installed on June 6, 2024, and were inspected on October 18, 2024, and verified. Credits generated from these practices will result in available credit quantities shown in Table 1. The WQT Plan proposes the generation of 16.7 pounds of total phosphorus credits per year and 2,222 pounds of TSS credits per year for the three-year period of 2024 through 2026. These credits will be incorporated into the modified WPDES permit that will expire on February 28, 2026, 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-2024-0010

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*	-	2.8	2.8	-	370	370
2025	0.2	16.7	16.9	-	2,222	2,222
2026	0.2	16.7	16.9	-	2,222	2,222

*Available credits in 2024 are based on conservation cover being planted on June 20th and being established as verified by the field inspection on October 18, 2024.

The Department conditionally approves the WQT Plan as a basis for water quality trading during the modified 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-2024-0010 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

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