

Permit Fact Sheet

General Information

Permit Number	WI-0064289-04-0
Permittee Name and Address	Badger Holsteins of Unity LLC W2031 CTH K, Unity, WI 54488
Permitted Facility Name and Address	Badger Holsteins of Unity LLC Main Dairy site - W2031 CTY HWY K Unity
Permit Term	January 01, 2026 to December 31, 2030
Receiving Water	South Fork Popple River (WBIC 1754100) within the Popple River Watershed of the Black River Basin, and groundwaters of the state
Discharge Type	Existing, continuous

Animal Units					
Animal Type	Current AU		Proposed AU (Note: If all zeroes, expansions are not expected during permit term)		
	Mixed	Individual	Mixed	Individual	Date of Proposed Expansion
Dairy Calves (under 400 lbs.)	120	0	120	0	01/01/2027
Milking and Dry Cows	4928	5034	7000	7150	01/01/2027
Heifers (800 lbs. to 1200 lbs.)	660	600	660	600	01/01/2027
Total	5708	5034	7780	7150	

Facility Description

Badger Holsteins of Unity LLC is an existing Concentrated Animal Feeding Operation (CAFO) located in the Township of Unity, Clark County. Badger Holsteins of Unity LLC consists of one production site: the Main Dairy site located at W2031 Cty Hwy K, Unity WI 54488. The operation is owned and operated by Joe and Jeff Meyer with a current herd size of 5,708 animal units (3,520 milking/dry cows, 600 heifers, and 600 calves). The farm is planning to expand to 7,780 animal units (5,000 milking/dry cows, 600 heifers, and 600 calves) during the permit term. This herd size is projected to produce approximately 55.1 million gallons of liquid manure/process wastewater and 1,620 tons of solid manure. Manure and process wastewater is stored in six (6) liquid waste storage facilities at the Main Dairy site. The total usable storage capacity is approximately 44.0 million gallons or 291 days of storage capacity for liquid manure and at least 59 days for solid manure. Currently, Badger Holsteins of Unity LLC owns or rents 3,369 acres of cropland, of which 3,549 acres are available for manure applications.

Substantial Compliance Determination

Enforcement During Last Permit:

1. None.

Compliance During Last Permit:

- The facility submitted all Annual Reports that are due by January 31.
- The facility submitted all Annual NMP Updates that are due by March 31.
- One manure application inspection (November 11, 2023) did not find CAFO permit violations.
- One production site inspection (September 25, 2024) did not find CAFO permit violations.
- Twenty-six Nutrient Management Plan field verifications (2024) did not find CAFO permit violations.

After a desk top review of annual reports, nutrient management plan updates, compliance schedule items, and several site visits including a production site inspection on September 25, 2024, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Todd Prill on October 23, 2025.

Sample Point Descriptions

Sample Point Designation For Animal Waste		
Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)	
001	Pit 1 (liquids) - Sample point 001 is for liquids from Pit 1 (WSF #1). The facility is in the western portion of the Main Dairy site. It was constructed in 2006 in a rectangular shape with top dimensions of 95 feet wide by 245 feet long by 8 feet deep and an estimated Maximum Operating Limit (MOL) of 575,764 gallons (2025 DNR calculation). The facility is the sand settling cell of a three-cell manure storage system and is an earthen berm, concrete lined in-ground storage. Plans and specifications were designed by Robert E Lee & Associates. Frontier FS Cooperative submitted engineering evaluation information on March 28 and June 8, 2011. A DNR letter from June 15, 2011, stated the evaluation for this structure "...demonstrates existing facilities and systems meet or perform equivalently to NRCS standards and ch. NR243 Wis. Adm. Code". This storage facility receives manure, process wastewater and feed storage runoff from the Sand Lane. It outlets into Pit 2 through a 15-inch underground pipe. An agitation boat mixes solids and liquids prior to emptying completely into Pit 4.	
002	Pit 2 (liquids) - Sample point 002 is for liquids from Pit 2 (WSF #2). The facility is in the western portion of the Main Dairy site. It was constructed in 2006 in a rectangular shape with top dimensions of 145 feet wide by 245 feet long by 17 feet deep and an estimated Maximum Operating Limit (MOL) of 1,861,546	

Sample Point Designation For Animal Waste		
Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)	
	gallons (2025 DNR calculation). The facility is the solid settling cell of a three-cell manure storage system and is an earthen berm, concrete lined in-ground storage. Plans and specifications were designed by Robert E Lee & Associates. Frontier FS Cooperative submitted engineering evaluation information on March 28 and June 8, 2011. A DNR letter from June 15, 2011, stated the evaluation for this structure "...demonstrates existing facilities and systems meet or perform equivalently to NRCS standards and ch. NR243 Wis. Adm. Code". This storage facility receives liquid waste from Pit 1. It outlets into Pit 3 through a 15-inch underground pipe. An agitation boat mixes solids and liquids prior to emptying completely into Pit 4.	
003	Pit 3 (liquids) - Sample Point 003 is for liquids from Pit 3 (WSF #3). The facility is in the western portion of the Main Dairy site. It was constructed in 2006 in a rectangular shape with top dimensions of 260 feet wide by 350 feet long by 16 feet deep and an estimated Maximum Operating Limit (MOL) of 6,393,138 gallons (2025 DNR calculation). The facility is the flushing cell of a three-cell manure storage system and is an earthen berm, concrete lined in-ground storage. Plans and specifications were designed by Robert E Lee & Associates. Frontier FS Cooperative submitted engineering evaluation information on March 28 and June 8, 2011. A DNR letter from June 15, 2011, stated the evaluation for this structure "...demonstrates existing facilities and systems meet or perform equivalently to NRCS standards and ch. NR243 Wis. Adm. Code". This storage facility receives liquid waste from Pit 2. Manure is pumped to Pit 4 through above-ground hoses as needed. An agitation boat mixes solids and liquids prior to emptying completely into Pit 4.	
004	Pit 4 (liquids) - Sample Point 004 is for liquids from Pit 4 (WSF #4). The facility is in the southwestern portion of the Main Dairy site. It was constructed in 2013 in a rectangular shape with top dimensions of 250 feet wide by 410 feet long by 11.5 feet deep and an estimated Maximum Operating Limit (MOL) of 8,193,036 gallons (2025 DNR calculation). The facility is an earthen berm, cast in place concrete lined in-ground storage. Plans and Specifications were designed by the Clark County Land Conservation Department and approved by the DNR on May 22, 2012. As-built documentation was submitted to the DNR on January 10, 2013. This storage facility receives liquid waste from Pit 3 through an above ground hose. An agitation boat mixes solids and liquids prior to removal for direct land application in the spring, summer, and fall.	
005	Waste Storage Solids (solids) - Sample point 005 is for any manure solids removed from bottom of liquid waste storage facilities. This includes manure-laden sand solids, manure fiber solids, solids removed from the digester, etc. Representative samples shall be taken when land applications occur.	
007	Misc. Solid Manure (solids) - Sample point 007 is for miscellaneous waste solids directly land applied from the production area of the Main Dairy site and not stored in a waste storage facility. This includes calf hutch manure and pen bedpack. Representative samples shall be taken when land applications occur.	
008	Sand Lane Solids (solids) - Sample point 008 is for sand lane manure solids that are directly land applied. The facility is in the western portion of the Main Dairy site just east of Pits 1 and 2. Sand is stacked and stored on pads west and east of the Sand Lane until it is reused as bedding. The sand stacking pad floor slopes toward the Sand Lane. Exterior cast in place concrete walls contain sand piles. Plans and specifications for the western storage pad and Sand Lane were designed by Robert E Lee & Associates. Frontier FS Cooperative submitted engineering evaluation information on March 28 and June 8, 2011. A DNR letter from June 15, 2011, stated the evaluation for this structure "...demonstrates existing facilities and systems meet or perform equivalently to NRCS standards and ch. NR243 Wis. Adm. Code". The eastern storage pad was designed by the Clark County Land Conservation Department with plans and	

Sample Point Designation For Animal Waste		
Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)	
	specifications approved by the DNR on May 22, 2012. As-built documentation was submitted to the DNR on January 10, 2013. Representative samples of solids shall be taken when land applications occur.	
009	Old Feed Pad - Sample point 009 is for visual monitoring and inspection of the Old Feed Pad and associated runoff control system. The facility is in the southcentral portion of the Main Dairy site. The original structure was built in 1995 with an addition in 2010. It stores haylage and bagged feed on an L shaped concrete pad with an estimated surface area of 116,000 square feet (2022 DNR calculation). The 2010 addition was designed by the Clark County Land Conservation Department. A DNR letter from June 15, 2011, stated the evaluation for this structure "...demonstrates existing facilities and systems meet or perform equivalently to NRCS standards and ch. NR243 Wis. Adm. Code". Plans and specifications for the current runoff control system were designed by Resource Engineering Associates and approved by the DNR on January 23, 2012. As- built documentation was provided to the DNR on Mar. 14, 2012. All liquids collected with the runoff control system are pumped directly to Pit 2.	
010	Big Feed Pad - Sample Point 010 is for the visual monitoring and inspection of the Big Feed Pad and associated runoff control system. The facility is in the northwest portion of the Main Dairy site. This structure was built in 2016 and stores an estimated 21,000 tons of corn silage in piles without any walls. It is rectangular in shape with dimensions of 333 feet by 415 feet (138,195 square feet – 2022 DNR calculation). Floors consist of 5-inch-thick asphalt over base aggregate with underground tile lines to collect leachate. Plans and specifications were designed by MSA Professional Services and approved by the DNR on September 16, 2016. Feed leachate and surface runoff drain west into a watertight concrete collection pit (Pit 5, Big Feed Pad Pit).	
011	Calf Hutch Area - Sample point 011 is for visual monitoring and inspection of the calf hutch area. Hutches are bedded with organic bedding on a gravel base, but do not have engineered runoff controls. Proper operation and maintenance are required to ensure discharges meet permit requirements. Inspections are required and shall be recorded according to a monitoring and inspection program.	
012	Anaerobic Digester - Sample point 012 addresses all digested liquids located within the proposed digester cells. Liquid manure will be supplied to the digester from the Sand Separation Building. Materials leaving the digester will be pumped to the proposed Pit 6 through underground transfer pipes. Sampling from within the digester cell(s) for nutrient content is only required if the liquids are to be manually pumped from the cell(s) and directly land applied. Plans and specifications for the digesters will need to be submitted & approved by the Department to meet permit requirements prior to construction.	
013	Pit 5 (liquids) - Sample Point 013 is for liquids from Pit 5 (WSF #5, Big Feed Pad Pit). The facility is in the northwestern portion of the Main Dairy site. It was constructed in 2016 in a rectangular shape with top dimensions of 100 feet wide by 415 feet long by 3 feet deep and an estimated total storage volume of 755,701 gallons and a Maximum Operating Limit (MOL) of 78,248 gallons for manure (2025 DNR calculation) after accounting for Big Feed Pad runoff collection. The pit is sized to accommodate a single 25yr-24hr storm (4.74 inches). The facility is an earthen berm, cast in place concrete lined in-ground storage. Plans and specifications were designed by MSA Professional Services and approved by the DNR on September 16, 2016. This storage facility receives runoff from the Big Feed Pad. Liquids in the structure are pumped to the Sand Lane as needed. Solids are removed as needed and directly field applied.	
014	Pit 6 (liquids) - Sample Point 014 is for liquids from Pit 6 (WSF #6). The facility is planned for installation in the western portion of the Main Dairy site. It was planned to be completed in 2016 in a round shape with inside dimensions of 516 feet in diameter by 18 feet deep and an estimated Maximum	

Sample Point Designation For Animal Waste		
Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)	
	Operating Limit (MOL) of 26,901,181 gallons (2025 DNR calculation). The facility will be a vertical wall, cast in place concrete lined above-ground storage. Plans and specifications were designed by the MSA Professional Services Inc. and approved by the DNR on July 17, 2025. This storage facility receives liquid waste from Pit 3, Pit 4, and a proposed Sand Separation Building through an underground 8-inch HDPE pipe. A drop in agitator mixes solids and liquids prior to removal for direct land application in the spring, summer, and fall.	
015	Sand Separation Building (solids) - Sample point 015 is for solids from the Sand Separation Building. The facility is planned for the southern portion of the Main Farm located immediately east of Pit 4. It is planned to be completed in 2026 with overall dimensions of 70 feet wide by 170 feet long. The facility will be above-ground with 8-inch-thick cast-in-place concrete floors and 12-inch-thick walls containing sand separation equipment and a storage area for manure laden sand. Plans and specifications were designed by MSA Professional Services Inc. and approved by the DNR on July 17, 2025. Vacuum trucks will collect manure from barns and deposited in the building. Liquids pumped from the Sand Lane will be added to the deposited manure. After sand is removed, it will be stored within the building until it is reused as bedding in the freestall barns.	

Permit Requirements

1 Livestock Operations - Proposed Operation and Management

Production Area Discharge Limitations

Beginning on the effective date of the permit, the permittee may not discharge pollutants from the operation's production area (e.g., manure storage areas, outdoor animal lots, composting and leachate containment systems, milking center wastewater treatment/containment systems, raw material storage areas) to navigable waters, except in the event a 25-year, 24-hour rainfall event (or greater) causes the discharge from a structure which is properly designed and maintained to contain a 25-year, 24-hour rainfall event for this location as determined under s. NR 243.04. If an allowable discharge occurs from the production area, state water quality standards may not be exceeded.

Runoff Control

The permit requires control of contaminated runoff from all elements of the production area to prevent a discharge of pollutants to navigable waters in accordance with the Production Area Discharge Limitations and to comply with surface water quality standards and groundwater standards. Beginning on the effective date of this permit, (if needed) interim measures shall be implemented to prevent discharges of pollutants to navigable waters. In addition, permanent runoff control system(s) shall be designed, operated and maintained in accordance with the requirements found in USDA Natural Resources Conservation Service standards and ch. NR 243, Wis. Adm. Code. If any upgrading or modifications to runoff controls are necessary, formal engineering plans and specifications must be submitted to the Department for approval.

Manure and Process Wastewater Storage

The permit requires the operation to have adequate storage for manure and process wastewater and that storage or containment facilities are designed, operated and maintained to prevent overflows and discharges to waters of the state. To prevent overflows, the permittee must maintain levels of materials in liquid storage or containment facilities at or

below certain levels including a one-foot margin of safety that can never be exceeded. If any upgrading or modifications to the storage facilities are necessary, formal engineering plans and specifications must be submitted to the Department for approval.

The permittee currently has approximately 291 days of storage for liquid manure. The permittee must maintain 180 days of storage, unless temporary reductions in required storage are approved by the Department.

Ancillary Service and Storage Areas

The permittee shall take preventative maintenance actions and conduct visual inspections to minimize pollutant discharges from areas of the operation that are not part of the production area or land application areas. These areas are called ancillary service and storage areas and include access roads, shipping and receiving areas, maintenance areas, refuse piles and CAFO outdoor vegetated areas.

Nutrient Management

With 7,780 animal units after expansion (5,000 milking/dry cows, 600 heifers, and 600 calves) from dairy animals, it is estimated that approximately 55,102,352 gallons of manure and process wastewater will be produced per year. The permittee owns 2,553 acres of cropland and has manure agreements for 1,116 acres. Of this acreage, 3,549 are spreadable. The permit requires all landspreading of manure and process wastewater be completed in accordance with an approved nutrient management plan. The permit will require sampling and analysis of manure and process wastewater that will be landspread. Landspreading rates must be adjusted based on sample analysis. The permit requires the permittee to maintain a daily log that documents landspreading activities. The permit also requires the submittal of an annual report that summarizes all landspreading activities. Plans must be updated annually to reflect cropping plans and other operational changes. Among the requirements, the plans must include detailed landspreading information including field by field nutrient budgets.

The permittee is required to implement a number of practices to address potential water quality impacts associated with the land application of manure and process wastewater. Among the permit conditions are restrictions on manure ponding, restrictions on runoff of manure and process wastewater from cropped fields, and setbacks from wells and direct conduits to groundwater (e.g., sinkholes, fractured bedrock at the surface). In addition, the permittee must implement a phosphorus based nutrient management plan that addresses phosphorus delivery to surface waters by basing manure and process wastewater applications on soil test phosphorus levels or the Wisconsin Phosphorus index. Additional phosphorus application restrictions apply to fields that are high in soil test phosphorus (>100 ppm).

The permittee must also implement conservation practices when applying manure near navigable waters and their conduits, referred to as the Surface Water Quality Management Area (SWQMA). These practices include a 100-foot setback from navigable waters and their conduits, a 35-foot vegetated buffer adjacent to the navigable water or conduit, or a practice that provides equivalent pollutant reductions equivalent to or better than the 100-foot setback.

In addition, the permittee must comply with restrictions on land application of manure and process wastewater on frozen or snow-covered ground. Included in these restrictions is a prohibition on surface applications of solid manure ($\geq 12\%$ solids) on frozen or snow-covered ground during February and March. Non-emergency surface applications of liquid manure (<12%) on frozen or snow-covered ground are prohibited.

Monitoring and Sampling Requirements

The permittee must submit a monitoring and inspection program that outlines how the permittee will conduct self-inspections to determine compliance with permit conditions. These self-inspections include visual inspections of water lines, diversion devices, storage and containment structures and other parts of the production area. The permit requires periodic inspections and calibrations of landspreading equipment. The permittee must take corrective actions to problems

identified inspections or otherwise notify the Department. Samples of manure, process wastewater and soils receiving land applied materials from the operation must also be collected and analyzed.

Sampling Points

The permit identifies the different sources of land applied materials (e.g., manure storage facilities, milking centers, egg-washing facilities) as “Sampling Points.” For these Sampling Points, the permittee is required to sample and analyze the different sources for nutrients and other parameters which serve as the basis for determining rates of application for these materials. Other areas are also identified as Sampling Points as a means of identifying them as areas requiring action by the permittee, such as an upgrade or evaluation of a certain system or structure (e.g., runoff control systems), even though sampling is not actually required.

1.1 Sample Point Number: 001- Pit 1 (liquids); 002- Pit 2 (liquids); 003- Pit 3 (liquids); 004- Pit 4 (liquids); 012- Anaerobic Digester; 013- Pit 5 (liquids); 014- Pit 6 (liquids)

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Nitrogen, Total		lb/1000gal	2/Month	Grab	
Nitrogen, Available		lb/1000gal	2/Month	Calculated	
Phosphorus, Total		lb/1000gal	2/Month	Grab	
Phosphorus, Available		lb/1000gal	2/Month	Calculated	
Solids, Total		Percent	2/Month	Grab	

1.1.1 Changes from Previous Permit

Sample points 001 – Pit 1, 002 – Pit 2, 003 – Pit 3, 004 – Pit 4, and 012 – Anaerobic Digester language was updated to describe the existing facilities more accurately.

Sample point 013 – Pit 5 was added as a unique sample point instead of being included as part of sample point 010 – Big Feed Pad runoff control system.

Sample point 014 – Pit 6 added for new waste storage facility approved by the department on 7/17/2025 (R-2025-0125).

1.1.2 Explanation of Operation and Management Requirements

Liquid manure and process wastewater sources must be properly stored and land applied according to the permit and nutrient management plan.

1.2 Sample Point Number: 005- Waste Storage Solids; 007- Misc. Solid Manure; 008- Sand Lane Solids, and 015- Sand Separation Building (solids)

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Nitrogen, Total		lbs/ton	Quarterly	Grab	
Nitrogen, Available		lbs/ton	Quarterly	Calculated	
Phosphorus, Total		lbs/ton	Quarterly	Grab	
Phosphorus, Available		lbs/ton	Quarterly	Calculated	
Solids, Total		Percent	Quarterly	Grab	

1.2.1 Changes from Previous Permit

Sample points 005- Waste Storage Solids, 007 – Misc. Solid Manure, and 008 – Sand Lane Solids language was updated to describe the existing source more accurately.

Sample point 006 – Headland Stacking Sites was removed since this practice is not used.

1.2.2 Explanation of Operation and Management Requirements

Solid manure must be properly stored and land applied according to the permit and nutrient management plan.

1.3 Sample Point Number: 009- Old Feed Pad; 010- Big Feed Pad, and 011- Calf Hutch Area

1.3.1 Changes from Previous Permit

Sample points 009- Old Feed Pad, 010 – Big Feed Pad, and 011 – Calf hutch Area language was updated to describe the existing source more accurately.

1.3.2 Explanation of Operation and Management Requirements

There is no required nutrient sampling for the runoff control sample points. Rather, weekly or quarterly inspections are required and shall be recorded according to the monitoring plan and submitted with the Annual Report.

2 Schedules

2.1 Emergency Response Plan

Required Action	Due Date
Develop Emergency Response Plan: Update the written Emergency Response Plan and submit to the department within 60 days of permit coverage.	02/28/2026

Explanation of Schedule

An emergency response plan is required to be developed per s. NR 243.13(6)(a).

2.2 Monitoring & Inspection Program

Required Action	Due Date
Proposed Monitoring and Inspection Program: Consistent with the Monitoring and Sampling Requirements subsection, the permittee shall submit a proposed monitoring and inspection program within 60 days of the effective date of this permit.	02/28/2026

Explanation of Schedule

A monitoring and inspection program is required to be submitted per s. NR 243.19(1).

2.3 Annual Reports

Submit Annual Reports by January 31st of each year in accordance with the Annual Reports subsection in Standard Requirements.

Required Action	Due Date
Submit Annual Report #1: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2026
Submit Annual Report #2: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2027
Submit Annual Report #3: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2028
Submit Annual Report #4: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2029
Submit Annual Report #5: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2030
Ongoing Annual Reports: Continue to submit Annual Reports until permit reissuance has been completed.	

Explanation of Schedule

Annual reports are required to be submitted per s. NR 243.19(3).

2.4 Nutrient Management Plan

Submit annual nutrient management plan (NMP) updates by March 31 of each year. Note, in addition to annual NMP updates, submit NMP amendments and substantial revisions to the department for written approval prior to implementation of any changes to the NMP.

Required Action	Due Date
Submit NMP Update #1: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2026
Submit NMP Update #2: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2027
Submit NMP Update #3: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2028
Submit NMP Update #4: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2029
Submit NMP Update #5: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2030
Ongoing Management Plan Annual Updates: Continue to submit Annual Updates to the Nutrient Management Plan until permit reissuance has been completed.	

Explanation of Schedule

Nutrient management plan updates are required to be submitted per s. NR 243.19(3).

2.5 Manure Storage Facility - Installation

Proposed Pit 6 identified as sample point 014

Required Action	Due Date
Complete Installation: Complete construction of the manure storage facility. The facility shall be functional and in operation by the specified Date Due. Post construction documentation shall be submitted within 6 months of completion of the project.	11/30/2026

Explanation of Schedule

Structure installation to maintain permit requirements of 180 days of liquid manure storage per s. NR 243.17(3).

2.6 Manure Storage Facility - Installation

Proposed Sand Separation Building identified as sample point 015

Required Action	Due Date
Complete Installation: Complete construction of the Sand Separation Building. The facility shall be functional and in operation by the specified Date Due. Post construction documentation shall be submitted within 6 months of completion of the project.	11/30/2026

Explanation of Schedule

Structure installation as part of new manure handling system per s. NR 243.15(3).

2.7 Digester Waste Treatment System Installation

Proposed digester identified as sample point 012

Required Action	Due Date
Plans and Specifications: Submit complete plans and specifications for a digester waste treatment system 90 days prior to construction of the system for Department review and approval in accordance with s. 281.41, Wis. Stats., and ch. NR 243, Wis. Adm. Code. See Standard Requirements for plan content information.	02/01/2028
Post-Construction Documentation: Post-construction documentation shall be submitted within 6 months of completion of the project.	02/01/2030

Explanation of Schedule

Structure is not required to meet permit requirements. Sample point to document potential additional manure storage structure per s. NR 243.15(3).

2.8 Submit Permit Reissuance Application

Required Action	Due Date
Reissuance Application: Submit a complete permit reissuance application 180 days prior to permit expiration.	06/30/2030

Explanation of Schedule

Reissuance applications are required to be submitted per s. NR 243.12(1).

Attachments

- Days of Storage Approval Letter (October 1, 2025)
- Nutrient Management Plan Approval Letter (October 9, 2025)
- Sample Point Map (October 2025)
- Public Notice (October 2025)

Justification Of Any Waivers From Permit Application Requirements

No waivers requested or granted as part of this permit reissuance.

Prepared By: Todd Prill

Agricultural Runoff Management Specialist

Date: October 24, 2025

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

PUBLIC NOTICE OF AVAILABILITY OF A NUTRIENT MANAGEMENT PLAN AND INTENT TO REISSUE
A WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM (WPDES) PERMIT No. WI-0064289-04-0

Permittee: Badger Holsteins of Unity LLC, W2031 CTH K, Unity, WI, 54488

Receiving Water And Location: Surface water and groundwater within the South Fork Popple River (WBIC 1754100) within the Popple River Watershed of the Black River Basin, and groundwaters of the state

Brief Facility Description : Badger Holsteins of Unity LLC is an existing Concentrated Animal Feeding Operation (CAFO) located in the Township of Unity, Clark County. Badger Holsteins of Unity LLC consists of one production site: the Main Dairy site located at W2031 Cty Hwy K, Unity WI 54488. The operation is owned and operated by Joe and Jeff Meyer with a current herd size of 5,708 animal units (3,520 milking/dry cows, 600 heifers, and 600 calves). The farm is planning to expand to 7,780 animal units (5,000 milking/dry cows, 600 heifers, and 600 calves) during the permit term. This herd size is projected to produce approximately 55.1 million gallons of liquid manure/process wastewater and 1,620 tons of solid manure. Manure and process wastewater is stored in six (6) liquid waste storage facilities at the Main Dairy site. The total usable storage capacity is approximately 44.0 million gallons or 291 days of storage capacity for liquid manure and at least 59 days for solid manure. Currently, Badger Holsteins of Unity LLC owns or rents 3,369 acres of cropland, of which 3,549 acres are available for manure applications.

The Department has tentatively decided that the above specified WPDES permit should be reissued.

Permit Drafter's Name, Address, Phone and Email: Todd Prill, DNR, 1300 W Clairemont Ave, Eau Claire, WI, 54701, (715) 214-8576, Todd.Prill@wisconsin.gov

Persons wishing to comment on or object to the proposed permit action, the terms of the nutrient management plan, or the application, or to request a public informational hearing may write to the Department of Natural Resources at the permit drafter's address. All comments or suggestions received no later than 30 days after the publication date of this public notice will be considered along with other information on file in making a final decision regarding the permit. Anyone providing comments in response to this public notice will receive a notification of the Department's final decision when the permit is re-issued. Where designated as a reviewable surface water discharge permit, the U.S. Environmental Protection Agency is allowed up to 90 days to submit comments or objections regarding this permit determination. If no comments are received on the proposed permit from anyone, including U.S. EPA, the permit will be re-issued as proposed.

The Department may schedule a public informational hearing if within 30 days of the public date of this notice, a request for a hearing is filed by any person. The Department shall schedule a public informational hearing if a petition requesting a hearing is received from USEPA or from 5 or more persons or if the Department determines there is significant public interest. Requests for a public informational hearing shall state the following: the name and address of the person(s) requesting the hearing; the interest in the proposed permit of the person(s) requesting the hearing; the reasons for the request; and the issues proposed to be considered at the hearing.

Information on file for this permit action, including the draft permit and fact sheet (if required), the operation's nutrient management plan and application may be inspected and copied at the permit drafter's office, Monday through Friday (except holidays), between 9:00 a.m. and 3:30 p.m. Please call the permit drafter for directions to their office location, if necessary. Information on this permit action may also be obtained by calling the permit drafter at (715) 214-8576 or by writing to the Department. Reasonable costs (15 cents per page for copies and 7 cents per page for scanning) will be charged for information in the file other than the public notice and fact sheet. Permit information is also available on the internet at: <http://dnr.wi.gov/topic/wastewater/PublicNotices.html>. Pursuant to the Americans with Disabilities Act, reasonable accommodation, including the provision of informational material in an alternative format, will be made to qualified individuals upon request.

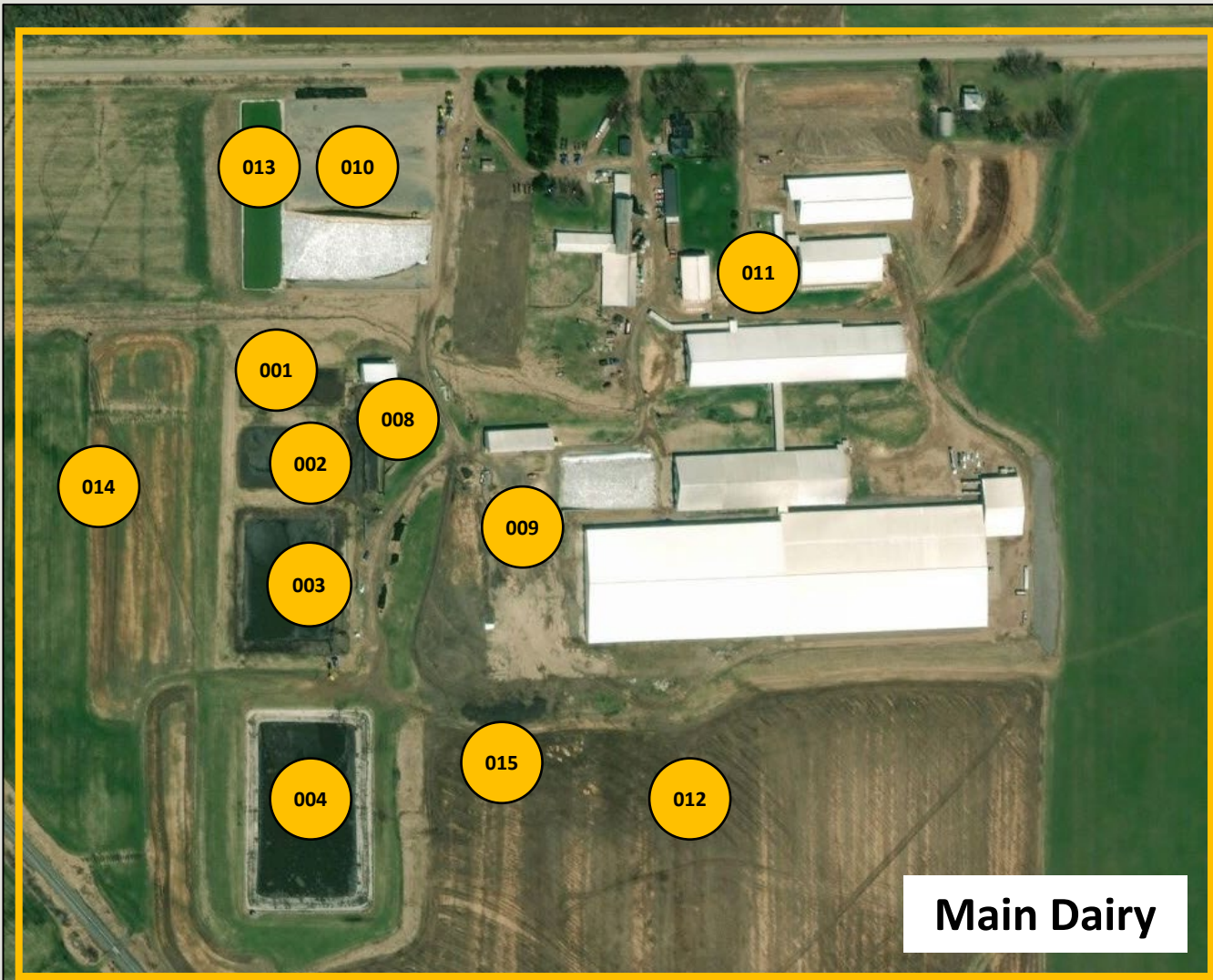
NAME OF PUBLISHING NEWSPAPER: **Enter Name of Publishing Newspaper**

ADDRESS OF PUBLISHING NEWSPAPER: **Enter Address of Publishing Newspaper**

Date Notice Issued: **Enter Date Notice Issued**

Badger Holsteins of Unity LLC

Sample Points



Sample Points – Main Dairy

001	Pit 1	004	Pit 4	010	Big Feed Pad	013	Pit 5
002	Pit 2	008	Sand Lane Solids	011	Calf Hutch Area	014	Pit 6
003	Pit 3	009	Old Feed Pad	012	Anaerobic Digester	015	Sand Separation Building

Sample Points – Facility Wide

005	Waste Storage Solids	007	Misc. Solid Manure
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October 1, 2025

FILE REF: R-2025-0207
WPDES Permit #: WI-0064289

Jeff Meyer
Badger Holsteins of Unity LLC
W2031 CTH K
Unity, WI 54488

Subject: Days of Storage Review for Badger Holsteins of Unity LLC in T27N, R01E, Section 08, Unity Township, Clark County – NO ADDITIONAL ACTION REQUIRED

Dear Mr. Meyer:

This letter is to inform you that the Wisconsin Department of Natural Resources (Department) has completed its review of the calculation of days of storage submitted by Ian Hansen, P.E., MSA Professional Services, Inc. on August 27, 2025 with revisions received on September 22, 2025 on behalf of Badger Holsteins of Unity LLC.

The Department reviewed the submitted calculations in accordance with ss. NR 243.14(9) and NR 243.15(3)(i) to (k), Wis. Adm. Code. Under s. NR 243.17(3)(c), Wis. Adm. Code, the permittee shall demonstrate compliance with the 180-day design storage capacity requirement at specified times. For the following liquid manure storage calculations, the Department has determined **no additional actions** on your part are required.

Days of Available Liquid Waste Storage: The submitted information states that Badger Holsteins of Unity currently has 373 days of liquid waste storage and the proposed condition will have 291 days of liquid waste storage after the proposed increase in animal units based on the volumes listed in the table below with respect to s. NR 243.15(3)(i) to (k), Wis. Adm. Code. The current number of animal units provided for the calculation is 5,708. The farm plans to expand to 7,780 animal units within the permit term. The liquid waste volumes are based on the NRCS spreadsheet and other estimated or calculated values for a collection period of 365 days. Full collection of leachate and contaminated runoff for up to the 25-yr, 24-hr storm event is provided for both of the existing feed pads.

Existing Condition (5,708 AU) – 373 Days of Storage

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding:	24,165,119
Parlor Wastewater:	6,132,365
Total Feed Storage Leachate:	299,080
Total Feed Storage Runoff Collected:	4,959,538
Total Sand Lane Runoff Collected:	438,993
Net Precipitation on Storage Surfaces:	7,116,540
Total Liquid Waste Stored Below the MOL:	43,111,635

Total Liquid Waste Storage Capacity (Gallons)						
Waste Storage	Total Volume from Top to Bottom	-Remaining Solids	-25-yr, 24-hr Precipitation on Storage	-25-yr, 24-hr Collected Runoff	-Freeboard Volume	Max. Operating Level (MOL) Volume
WSF #1	955,729	79,810	77,833	62,115	160,207	575,764
WSF #2	2,623,636	72,683	112,369	326,104	250,934	1,861,546
WSF #3	7,626,939	340,789	267,349	0	625,663	6,393,138
WSF #4	10,158,315	636,355	394,237	0	934,687	8,193,036
WSF #5	755,701	0	137,152	388,219	152,082	78,248
Pipping	29,864,141	781,784	617,609	0	1,563,568	26,901,181
Total MOL Volume:						44,002,913

Proposed Condition (7,780 AU) – 291 Days of Storage

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding:	33,582,951
Parlor Wastewater:	8,705,250
Total Feed Storage Leachate:	299,080
Total Feed Storage Runoff Collected:	4,959,538
Total Sand Lane Runoff Collected:	438,993
Net Precipitation on Storage Surfaces:	7,116,540
Total Liquid Waste Stored Below the MOL:	55,102,352

Total Liquid Waste Storage Capacity (Gallons)						
Waste Storage	Total Volume from Top to Bottom	-Remaining Solids	-25-yr, 24-hr Precipitation on Storage	-25-yr, 24-hr Collected Runoff	-Freeboard Volume	Max. Operating Level (MOL) Volume
WSF #1	955,729	79,810	77,833	62,115	160,207	575,764
WSF #2	2,623,636	72,683	112,369	326,104	250,934	1,861,546
WSF #3	7,626,939	340,789	267,349	0	625,663	6,393,138
WSF #4	10,158,315	636,355	394,237	0	934,687	8,193,036
WSF #5	755,701	0	137,152	388,219	152,082	78,248
Pipping	29,864,141	781,784	617,609	0	1,563,568	26,901,181
Total MOL Volume:						44,002,913

Should you have any questions, please contact Rob, DNR Madison office or your regional CAFO Specialist.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that the Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. For judicial review of a decision pursuant to WIS. STAT. §§ 227.52 and 227.53, you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition

with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review must name the Department of Natural Resources as the respondent.

To request a contested case hearing pursuant to WIS. STAT. § 227.42, you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. All requests for contested case hearings must be made in accordance with WIS. ADMIN. CODE § NR 2.05(5), and served on the Secretary in accordance with WIS. ADMIN. CODE § NR 2.03. The filing of a request for a contested case hearing does not extend the 30-day period for filing a petition for judicial review.

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES



Bernie Michaud, P.E.
CAFO Engineer Supervisor
Watershed Management Program



Rob Davis, P.E.
CAFO Review Engineer
Watershed Management Program

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Falon French; DNR, Central Office
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Rob Davis, P.E.; DNR, Central Office
(608) 225-2720; Robert.Davis@wisconsin.gov



October 9, 2025

Jeff Meyer
Badger Holsteins of Unity, LLC
W2031 Cth K
Unity, WI 54488

SUBJECT: Conditional Approval of Badger Holsteins of Unity LLC Nutrient Management Plan, WPDES Permit No. 0064289-04-0

Dear Jeff Meyer:

After completing a review of Badger Holsteins of Unity LLC 2026-2030 Nutrient Management Plan (NMP) the Wisconsin Department of Natural Resources (Department) is providing conditional approval that it is consistent with Nutrient Management Requirements in s. NR 243, Wis. Adm. Code. This part of your WPDES permit application is now ready for the public notice and comment process as required by Ch. 283 Stats.

Before applying manure onto approved fields each season, the Department recommends Badger Holsteins of Unity LLC review the NMP with those individuals involved with manure applications to ensure all remain familiar with the approved manure spreading protocol, spreading maps, field and map verification, record keeping requirements, and all the conditions of this approval.

FINDINGS OF FACT

The Department confirms that:

1. A current dairy herd size of 5708 animal units (3520 milking & dry cows, 600 heifers, and 600 calves). A planned herd size of 7780 animal units (5000 milking & dry cows, 600 heifers, and 600 calves) in 2027.
2. Manure generation and spreading records indicate your herd will annually generate approximately 43,111,635 gallons of manure and process wastewater and 1620 tons of solid manure in the first year of the permit term, and 55,102,352 gallons of manure and process wastewater and 1620 tons of solid manure in 2027.
3. The use of application restriction options 1 and 5 within surface water quality management areas.
4. The use of phosphorus delivery method P Index.
5. That Badger Holsteins of Unity LLC currently has 3669 acres (2553 owned and 1116 controlled through contracts, rental agreements or leases, or under manure agreements) of which 3549 are spreadable acres.
6. That all fields will be checked for the following features prior to/during manure or process wastewater applications: soil areas with possible shallow groundwater (i.e., within 24 inches of surface) at the time of manure application; required setbacks associated with wells, navigable waters, conduits to navigable waters, grassed waterways, wetlands, possible soil erosion/flow channels.

7. That surface applications of manure will not be completed when precipitation capable of producing runoff is forecasted within 24 hours of the time of planned application.

CONDITIONAL NUTRIENT MANAGEMENT PLAN APPROVAL

The Department hereby approves the 2026-2030 Badger Holsteins of Unity LLC Nutrient Management Plan subject to the following conditions and the applicable requirements of Ch. NR 243, Wis. Adm. Code:

FIELD AND MANURE MANAGEMENT

1. Fields not included in the NMP and new fields shall not receive manure or process wastewater applications until they have been properly soil sampled, entered into Snap Plus, evaluated for their nutrient needs, and approved by the Department.
2. If existing fields yield a soil test results equal to or greater than 200 ppm P, those fields would be prohibited from receiving manure or process wastewater applications, unless you obtain Department approval in accordance with NR 243.14(5)(b)2., Wis. Adm. Code.
3. All liquid manure samples collected may be analyzed, at a minimum, for percent dry matter, total nitrogen, percent $\text{NH}_4\text{-N}$, percent $\text{NO}_3\text{-N}$, phosphorus, potassium, and sulfur.
4. If manure sample results have a dry matter (DM) content less than 2.0% and the percent ammonium (NH_4^+) is greater than 75% of the total N, Badger Holsteins of Unity LLC may use the following equation to adjust the first year available nitrogen when applications are injected or incorporated within 1 hour:

$$\text{First-Year Available N} = \text{NH}_4\text{-N} + [0.25 \times (\text{Total N} - \text{NH}_4\text{-N})]$$

5. Badger Holsteins of Unity LLC shall record daily manure applications by using the SnapPlus Daily Spreading Log. These forms shall be retained at the farm and provided to the department upon request.
6. Badger Holsteins of Unity LLC shall annually submit a spreading report that summarizes the land application activities listed under NR 243.19(3)(c)5., Wis. Adm. Code by using the SnapPlus Annual Spreading Report.

WINTER SPREADING

7. Liquid manure applications during winter conditions, as defined by NR 243.14(7), Wis. Adm. Code, are prohibited with the exception of emergency applications.
8. The following field(s) are approved for winter spreading solid manure, emergency applications of liquid manure and frozen liquid manure:

• ALEXANDER • BERT M ACROSS • RICH • BERT M NW CORNER • BERT M SOUTH • GRIES MIDDLE	• H. MILLER NORTH • HASSERODT NE • HASSERODT NW • HETCHLER BRICK HOUSE • JAKOBI • JARV BARN	• JARV PAST • JARV SW • NEWKIRK SE • WEIDEMAN_BACK • WEIDEMAN_FRONT • WEST STEVE GOETZ • WHITE BARN
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9. Winter spreading of solid and liquid manure may not occur during the “high risk runoff period” pursuant to s. NR 243.14(6)(c) and NR 243.14(7)(c), respectively.

10. Winter applications of liquid manure shall only occur under emergency situations, after notifying the Department and receiving verbal approval.
11. Liquid applications shall be limited to 3,500 gallons per acre or 30 lbs. P per acre, whichever is less, on slopes 2-6% and 7,000 gallons per acre or 60 lbs. P per acre, whichever is less, on slopes 0-2%. Winter applications of solid manure shall be limited to 60 lbs. P per acre.

HEADLAND STACKING

12. No headland stacking sites are approved.

MANURE & PROCESS WASTEWATER IRRIGATION

13. Irrigation of manure or process wastewater is prohibited.

SUBMITAL AND RECORDKEEPING REQUIREMENTS

14. A copy of this conditional approval shall be included in all future annual Nutrient Management Plan Updates in addition to the NR 243 and NRCS 590 checklists.

ITEMS FOR FUTURE CONSIDERATION

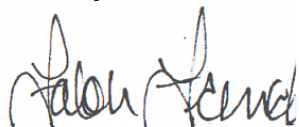
15. The animal unit to acreage ratio exceeds 1:1, and the nutrient management plan utilizes greater than 90 percent of the spreadable acreage through the permit term. This can lead to overutilization of the land base and rising soil test P levels. It is recommended to monitor the soil nutrient content and adjust manure and fertilizer application rates, to ensure that fields do not build soil test P

This conditional approval does not limit the Department's regulatory authority to require NMP revisions (based upon new information or manure irrigation research findings) or request additional information in order to confirm or ensure your farm operation remains in compliance with NR 243 and your WPDES permit conditions. If additional information, project changes or other circumstances indicate a possible need to modify this approval, the Department may ask you to provide further information relating to this activity.

Please keep in mind that approval by the Department of Natural Resources – Runoff Management Program does not relieve you of obligations to meet all other applicable federal, state or local permits, zoning and regulatory requirements.

If you have any questions regarding this approval I can be reached at (608) 228-5265 or Falon.French@Wisconsin.gov.

Sincerely,



Falon French
WDNR CAFO Intake/Nutrient Management Specialist
Wisconsin Department of Natural Resources

cc: Todd Prill, WDNR Agricultural Runoff Specialist (Todd.Prill@wisconsin.gov)
Bradley A Johnson, WDNR Watershed Field Supervisor (Robert.Davis@wisconsin.gov)
Erin Hanson, WDNR Acting Section Manager (ErinE.Hanson@wisconsin.gov)
Aaron O'Rourke, WDNR Nutrient Management Program Coordinator (Aaron.Orourke@Wisconsin.gov)
Ashley Scheel, WDNR CAFO Nutrient Management Plan Reviewer (Ashley.Scheel@Wisconsin.gov)
Rob Davis, WDNR CAFO Engineer (Robert.Davis@wisconsin.gov)
Fred Subke, Clark County (fred.subke@co.clark.wi.us)
Matt Luther, Rock River Laboratory, Inc. (matt_luther@rockriverlab.com)
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