Permit Fact Sheet

General Information

Permit Number:	WI-0065421-02-0
Permittee Name:	Ledgeview Farms LLC
Address:	3870 Dickinson Rd
City/State/Zip:	De Pere WI 54115
Discharge Location:	Unnamed tributaries within the Bower Creek Watershed, East River Watershed, and groundwaters of the state

Animal Units					
	Current AU		**Proposed AU** (Note: If all zeroes, expansions are not expected during permit term)		
Animal Type	**Mixed**	**Individual**	**Mixed**	**Individual**	**Date of Proposed Expansion**
Dairy Calves (under 400 lbs.)	78	0	110	0	10/17/2025
Milking and Dry Cows	1498	1530	2380	2431	10/17/2025
Heifers (400 lbs. to 800 lbs.)	156	260	330	550	10/17/2025
Heifers (800 lbs. to 1200 lbs.)	286	260	605	550	10/17/2025
Steers or Cows (400 lbs. to market)	600	600	800	800	10/17/2025
Total	2618	1530	4225	2431	

Facility Description

Ledgeview Farms LLC is a Concentrated Animal Feeding Operation (CAFO) owned and operated by the Pansier family. It currently has 2,618 animal units (1,070 milking & dry cows, 520 heifers, 390 calves, and 600 steers) and plans to expand to 4,225 animal unites by 2028. Based on current herd size, Ledgeview Farms will have approximately 320 days of liquid waste storage. Ledgeview Farms generates approximately 23,805,372 gallons of liquid manure and 17,592 tons of solid waste annually and currently has 3,314 acres (887.5 owned and 2,437.5 controlled through contracts, rental agreements or leases, or under manure agreements) of which 3,203 are spreadable acres.

Substantial Compliance Determination

Enforcement During Last Permit: During the previous permit term, Ledgeview Farms was referred to the Department of Justice for multiple alleged violations including failure to abandon noncompliant facilities and failure to maintain 180 days of storage. As of 09/18/2023, Ledgeview Farms has completed all previously required actions as part of the enforcement process and has returned to compliance.

After a desk top review of all compliance schedule items and associated reporting records, and a site visit on 08/01/2023, this facility has been found to be in substantial compliance with their current permit.

Compliance determination entered by Holly Stegemann on 05/20/2024.

Sample Point Designation For Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
001	WSF 001 (Main Farm): Sample point 001 is for liquid manure and process wastewater that is land applied directly from waste storage facility 1 (WSF 001). WSF 001 is an earthen lined facility with a ramp located on the southeast corner, that was constructed in 2015 and located at the main farm site. The storage facility has a total volume of 5,012,044 gallons and a maximum operating level of 4,425,806 gallons. WSF 001 accepts manure and process wastewater from the freestall barns and the milking parlor.	
003	Reception Tank (Heifer Site): Sample point 003 is for liquid manure and process wastewater that is directly land applied from the reception tank at the heifer site. The reception tank is a concrete, open-top reception tank that functions as part of the manure transfer system located on the west side of the concrete heifer feedlot. This reception tank has a capacity of 27,829 gallons and was constructed in 2009. The tank accepts manure and process wastewater from the concrete heifer feedlot at the heifer site. Waste is removed with a transfer pump for discharge either directly to fields via land application or to WSF 001. The tank was evaluated in 2017 and meets permit requirements. Representative samples shall be collected only if waste is directly land applied from the reception tank.	
007	WSF Solids: Sample point 007 is for manure solids land applied from Waste storage facilities 1-3. These facilities are described in sample point 001, 003, and 016 respectively. Representative samples shall be taken from each waste storage facility when land application occurs.	
008	Headland Stacking: Sample point 008 is for solid manure land applied from approved headland stacking sites. Representative samples must be taken prior to land application. Stacks are defined as part of the production area and therefore subject to the production area discharge limitations of this permit. Weekly inspections of stack runoff controls are required and shall be recorded according to monitoring program.	
009	Misc. Solids: Sample point 009 is for any miscellaneous solid manure directly land applied and not stored in a waste storage facility. This includes calf hutch manure, maternity pen bedpack, heifer bedpack, and any solids removed from the digester. Representative samples shall be taken for each manure source type.	
010	Feedlot & Runoff Control System (Main Site): Sample point 010 is for visual monitoring and inspection of the concrete feedlot and associated runoff control system located at the main farm site. Proper operation and maintenance is required to ensure discharges to waters of the state do not occur. Weekly inspections are required and shall be recorded according to monitoring program.	
011	Feedlot & Runoff Control System (Heifer Site): Sample point 011 is for visual monitoring and inspection of the concrete heifer feedlot and associated runoff control system located at the heifer site. Proper operation and maintenance is required to ensure discharges to waters of the state do not occur. Weekly inspections are required and shall be recorded according to monitoring program.	
014	Storm Water Runoff Control System: Sample point 014 is for visual monitoring and inspection of all production site storm water conveyance systems. This includes roof gutter and downspout structures, drainage tile systems, grassed waterways, and other diversion systems that transport uncontaminated storm water. Proper operation and maintenance is required to keep uncontaminated runoff diverted away from	

Sample Point Designation For Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
	manure and process wastewater handling systems. Weekly inspections are required and shall be recorded in accordance with the monitoring and inspection program.	
015	Feed Storage Area & Runoff Control System (Glenmore): Sample point 015 is for visual monitoring and inspection of the satellite feed storage area and associated runoff control system that is located at the Glenmore Site. Proper operation and maintenance is required to ensure discharges of process wastewater to waters of the state do not occur. Weekly inspections are required and shall be recorded according to the monitoring and inspection program.	
016	WSF 003 (Glenmore): Sample point 016 is for liquid manure and process wastewater that is directly land applied from waste storage facility 3 (WSF 003). WSF 003 is a concrete lined structure that was constructed in 2021. This facility has a total volume of 19,696,189 gallons and a maximum operating level of 16,415,822 gallons. This storage will accept sileage leachate and precipitation runoff from the adjacent feed storage pad as well as manure from the main farm and heifer site via tanker trucks.	

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 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. In order 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 submitted to the Department for approval.

The permittee currently has approximately 320 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.

Solid Manure Stacking

The operation has proposed to stack solid manure. All stacking of solid manure shall be done in accordance ch. NR 243, Wis. Adm. Code, which includes restrictions from NRCS Standard 313. Stacking of manure is considered to be part of the production area and is subject to the Production Area Discharge Limitations.

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 2,618 animal units (1,070 milking & dry cows, 520 heifers, 390 calves, and 600 steers), it is estimated that approximately 23,805,372 gallons of manure and process wastewater will be produced per year. The permittee owns *approximately* 887.5 acres of cropland and rents about 2,437.5. Given the rotation commonly used by the permittee, 3,203 acres are available (or open) to receive manure and process wastewater on an annual basis. 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 or 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 permitee 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.

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.

Sample Point Number: 001- WSF 001 (liquids); 003- Reception Tank (Heifer), and 016- WSF 003 (Glenmore)

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 point 002 was removed and language updated to more accurately reflect the production area.

1.1.2 Explanation of Operation and Management Requirements

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

Sample Point Number: 007- WSF (solids); 008- Headland Stacking; 009- Misc. 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	

1.1.3 Changes from Previous Permit

Sample points 004, 005, and 006 were removed and language updated to more accurately reflect the production area.

1.1.4 Explanation of Operation and Management Requirements

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

Sample Point Number: 010- Main Site Feedlot; 011- Heifer Feedlot; 014- Storm Water Runoff Controls, and 015- Feed Storage Area Controls

1.1.5 Changes from Previous Permit

Sample points 012 and 013 were removed and language updated to more accurately reflect the production area.

1.1.6 Explanation of Operation and Management Requirements

Proper operation and maintenance is required to ensure unlawful discharges to waters of the state do not occur. Weekly and quarterly inspections are required and shall be recorded according to the monitoring plan.

2 Schedules

2.1 Emergency Response Plan

Required Action	Due Date
Develop Emergency Response Plan: Update the written Emergency Response Plan within 30 days of permit coverage, available to the Department upon request.	09/01/2024

2.2 Monitoring & Inspection Program

Use of the department's monitoring and inspection program template is encouraged, but optional.

Required Action	Due Date
Proposed Monitoring and Inspection Program: Consistent with the monitoring and sampling requirements subsection, the permittee shall update and submit a proposed monitoring and inspection program within 30 days of the effective date of this permit	09/01/2024

2.3 Annual Reports

Submit annual reports by January 31 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.	01/31/2025

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

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
Management Plan Submittal: Submit any necessary updates to the Nutrient Management Plan to meet the conditions outlined in this permit (see conditions in the Livestock Operational and Sampling Requirements section).	
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.	03/31/2025
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.	03/31/2026
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.	03/31/2027
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.	03/31/2028
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.	03/31/2029
Ongoing Management Plan Annual Updates: Continue to submit Annual Updates to the Nutrient Management Plan until permit reissuance has been completed.	

2.5 Submit Permit Reissuance Application

Required Action	Due Date
Reissuance Application: Submit a complete permit reissuance application 180 days prior to permit expiration.	02/01/2029

2.6 Explanation of Schedules

Emergency Response Plan, Monitoring and Inspection Program – Schedules consistent with permit requirements. Annual Reports, Nutrient Management Plan, Submit Permit Reissuance Application - Schedules consistent with permit requirements.

Attachments:

Plan Approval Letter(s)

- Evaluation Review of Days of Storage – 05/07/2024
- 5-Year Nutrient Management Plan – 04/25/2024
- Inspection Report - 08/01/2023

Expiration Date:

07/31/2029

Prepared By: Holly Stegemann Agricultural Runoff Management Specialist Date: 05/20/2024

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WISCONSIN DEPT. OF NATURAL RESOURCES

May 7, 2024

FILE REF: R-2023-0206
WPDES Permit #: WI-0065421

Jason Pansier
Ledgeview Farms LLC
3870 Dickinson Rd
De Pere, WI 54115

Subject: Days of Storage Review for Ledgeview Farms LLC T23N, R21E, Section 33 in Ledgeview Township, Brown County – NO ADDITIONAL ACTION REQUIRED

Dear Mr. Pansier:

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 under certification by Douglas Gatrell, GHD Services Inc. on September 25, 2023 on behalf of Ledgeview Farms 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 Ledgeview Farms LLC currently has 320 days of liquid waste storage 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 2580. The operation plans to expand to 4150 animal units over the course of the permit term including adding 600 milking cows with manure managed as a liquid. The operation has calculated 239 days of liquid waste storage after expansion based on the volumes listed in the second set of tables below. The liquid waste volumes are based estimated or calculated values for a collection period of 365 days. Process wastewater and runoff is collected from the concrete feedpad and directed to the liquid waste storages. Precipitation on waste storages were accounted for in liquid storage calculations. The two outdoor heifer lots on Headquarters and Heifer farm have reception tanks designed to contain the 25-year 24-hour storm. All runoff, up to the 25yr – 24hr storm, from the existing feed storage area is collected in permanent storage.

Before Expansion:

Waste Storage	Total Vol. from Settled Top to Bottom	-Solids Storage	-25-yr, 24-hr Precip. On Storage	25-yr, 24-hr Collected Runoff ***	-Freeboard Vol.	Max. Operating Level (MOL) Vol.
#1	5,012,044	0	177,386		408,852	4,425,806
#2	19,696,189	0	631,356	837,760	1,776,685	16,450,388
					Total MOL Vol:	20,876,194
					Days of Storage:	**320**

Liquids Collected/Stored	Annual Gallons
Liquid Manure	9,855,000
Solid Manure	1,715,811
Discarded Sand Bedding	737,300
Feed Storage Leachate	149,600
Feed Storage Runoff Collected *	6,534,528
Feedlot Runoff*	915,497
Net Precipitation on Storage Surface(s) **	3,897,782
TOTAL:	**23,805,518**

After Expansion:

Waste Storage	Total Vol. from Settled Top to Bottom	-Solids Storage	-25-yr, 24-hr Precip. on Storage	25-yr, 24-hr Collected Runoff ***	-Freeboard Vol.	Max. Operating Level (MOL) Vol.
#1	5,012,044	0	177,386		408,852	4,425,806
#2	19,696,189	0	631,356	837,760	1,776,685	16,450,388
					Total MOL Vol:	20,876,194
					Days of Storage:	**239**

Liquids Collected/Stored	Annual Gallons
Liquid Manure	16,425,000
Solid Manure	2,711,471
Discarded Sand Bedding	1,228,590
Feed Storage Leachate	149,600
Feed Storage Runoff Collected *	6,534,528
Feedlot Runoff*	915,497
Net Precipitation on Storage Surface(s) **	3,897,782
TOTAL:	**31,862,468**

Should you have any questions, please contact Tabatha Davis, 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

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Watershed Management Program

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April 25th, 2024

Brown County
Approval

Jason Pansier
Ledgeview Farms LLC
3870 Dickinson Rd
De Pere, WI 54115

SUBJECT: Conditional Approval of Ledgeview Farms LLC Nutrient Management Plan, WPDES Permit No. 0065421-02-0

Dear Jason Pansier,

After completing a review of Ledgeview Farms LLC 2024-2028 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 Ledgeview Farms 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. Specifically, some fields in Ledgeview Farms LLC may have:

- Soils that may have bedrock or groundwater within 24 inches of surface,
- Multiple setback areas due to streams, conduits to streams, grassed waterways, wetlands, or wells, and
- Evidence of possible soil erosion/flow channels. Note: road ditches or other man-made channels may be considered flow channels or conduits to navigable water and may be subject to a SWQMA and setback.

Reviewing the NMP and checking fields for these features and soil conditions prior to manure applications will help Ledgeview Farms LLC maintain compliance with their WPDES permit and Ch. NR 243 requirements.

FINDINGS OF FACT

The Department confirms that:

1. A current dairy herd size of 2,618 animal units (1,070 milking & dry cows, 520 heifers, 390 calves, and 600 steers). A planned herd size of 4,225 animal units (1,700 milking & dry cows, 1,100 heifers, 550 calves, and 800 steers) by 2028.
2. Manure generation and spreading records indicate your herd will annually generate approximately 23,805,372 gallons of manure and process wastewater and 11,132 tons of solid manure in the first year of the permit term. The herd will generate approximately 31,862,468 gallons of manure and process wastewater and 17,592 tons of solid manure by 2028 when the herd has reached full expansion.
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 Ledgeview Farms LLC currently has 3,314 acres (887.5 owned and 2,437.5 controlled through contracts, rental agreements or leases, or under manure agreements) of which 3,203 (SWQMA option 1) or 3,005 (SWQMA option 5) are spreadable acres.
6. That some fields included in the NMP are directly adjacent to or have high potential to deliver nutrients and sediment to: Twin Hill Creek (listed 303(d) impaired water by 'total phosphorus'), East River (listed 303(d) impaired water by 'sediment/total suspended solids', 'total phosphorus', and 'unspecified metals'), Bower Creek (listed 303(d) impaired water by 'sediment/total suspended solids' and 'total phosphorus')
7. That no fields included in the NMP are directly adjacent to or have high potential to deliver nutrients and sediment to outstanding/exceptional waters.
8. That 10 fields are tiled.
    - Herold-Zander Rd
    - KH-1
    - MV-3
    - RA-East
    - RA-West
    - Schlag 1
    - Shirley Rd
    - Stein
    - Stein-Morrison Rd
    - Tower-W

9. 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.
10. 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 2024-2028 Ledgeview Farms 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. The following fields have also been approved to receive industrial, municipal, or septage waste:

Field ID:	Other Permittee Name:	Other Permitte Site ID:	Other Permittee Field ID:	DNR #:
Stein 5	NLC ENERGY DENMARK LLC	ST3	5	116080
Stein-Morrison Rd	NLC ENERGY DENMARK LLC	SV7	1	116082
Stein-Morrison Rd	NLC ENERGY DENMARK LLC	SV7	2	116083
Stein-Morrison Rd	NLC ENERGY DENMARK LLC	SV7	3	116084
Stein 1	NLC ENERGY DENMARK LLC	ST3	1	116076
Stein-Cty G	NLC ENERGY DENMARK LLC	VK33	2	116085
Stein 2	NLC ENERGY DENMARK LLC	ST3	2	116077
Stein 4	NLC ENERGY DENMARK LLC	ST3	3	116078
Stein 5	NLC ENERGY DENMARK LLC	ST3	4	116079
Herold-Zander Rd	NLC ENERGY DENMARK LLC	RP	1	112534
Stein 3	NLC ENERGY DENMARK LLC	ST3	3	116078

Prior to any manure applications on these fields Ledgeview Farms LLC shall contact the entities listed above to obtain recent spreading records and make the necessary adjustments to the planned manure application

rates. At the end of each year Ledgeview Farms LLC shall contact each entity listed above to obtain spreading records from the previous year so that they can be properly tracked in the NMP. Please Note: Ledgeview Farms LLC is responsible for obtaining nutrient content values for all other wastes spread on any field in their NMP.

3. The following fields are prohibited from receiving applications of manure or process wastewater:
   - VO10 (default soil test)
   - VO11 (default soil test)
   - LT 9-11 (expired soil test)
   - LT-8 (expired soil test)

   If Ledgeview Farms LLC wishes to use these fields for applications of manure or process wastewater all necessary information shall be submitted to the Department prior to application to demonstrate compliance with NR 243 and other applicable codes. Written Department approval amending this condition approval must be received prior to application.

4. 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.

5. All liquid manure samples collected may be analyzed, at a minimum, for percent dry matter, total nitrogen, percent NH_4-N, percent NO_3-N, phosphorus, potassium, and sulfur.

6. 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, Ledgeview Farms LLC may use the following equation to adjust the first-year available nitrogen when applications are injected or incorporated within 1 hour:

   $$\text{First-Year Available N} = NH_4\text{-N} + [0.25 \times (\text{Total N} - NH_4\text{-N})]$$

7. Ledgeview Farms LLC shall record daily manure applications by using form 3200-123A. These forms shall be retained at the farm and provided to the department upon request.

8. Ledgeview Farms 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 'CAFO Annual Spreading Reports' as generated by Snap Plus.

WINTER SPREADING

9. Liquid manure applications during winter conditions, as defined by NR 243.14(7), Wis. Adm. Code, are prohibited with the exception of emergency applications.

10. The following field(s) are approved for winter spreading solid manure, emergency applications of liquid manure and frozen liquid manure:
    - Behind Russ House
    - DH-1
    - RA-West
    - Kolanchek
    - South Roger House
    - Stein
    - M Koenig
    - Jeromes
    - Heifer North
    - Heifer South
    - Heifer West
    - Louis
    - Dollars-Power Poles
    - Elroy North
    - Elroy South
    - Aschenbrenner-Zion Rd
    - Borley East
    -

*It is noted that any areas with Silurian Bedrock are not eligible for use during winter due to tillage requirements.

11. The following field(s) are denied for winter spreading solid manure, emergency applications of liquid manure and frozen liquid manure:

- Behind Roy (Silurian Bedrock)

12. 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.

13. Winter applications of liquid manure shall only occur under emergency situations, after notifying the Department and receiving verbal approval.

HEADLAND STACKING

14. No headland stacking sites are approved.

NR243.143/151.075 SILURIAN BEDROCK PERFORMANCE STANDARDS

15. Manure generated by Ledgeview Farms LLC that is mechanically applied to the following approved fields meet planning requirements under NR243.143/151.075, Silurian bedrock performance standards. The following fields are required to meet all requirements under NR243.143/151.075, Silurian bedrock performance standards immediately following this approval.
    - Big Barn
    - Behind Roy
    - Collection Pt
    - Stein-Cty G
    - Peterson Shed
    - Park
    - VO10
    - VO11

MANURE & PROCESS WASTEWATER IRRIGATION

16. Irrigation of manure or process wastewater is prohibited.

SUBMITAL AND RECORDKEEPING REQUIREMENTS

17. 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.

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 locate permits, zoning, and regulatory requirements.

If you have any questions regarding this approval I can be reached at 608-212-8460 or Ashley.Scheel@Wisconsin.gov.

Sincerely,

Ashley Scheel, CCA
WDNR Nutrient Management Plan Reviewer
Wisconsin Department of Natural Resources

Cc: Holly Stegemann, WDNR Agricultural Runoff Specialist (Holly.Stegemann@Wisconsin.gov)
Joe Baeten, WDNR Watershed Field Supervisor (Joseph.Baeten@Wisconsin.gov)
Christopher Clayton, WDNR Runoff Management Section Chief (Christopherr.Clayton@Wisconsin.gov)
Tyler Dix, WDNR CAFO Program Coordinator (Tyler.Dix@Wisconsin.gov)
Aaron O'Rourke, WDNR Nutrient Management Program Coordinator (Aaron.Orourke@Wisconsin.gov)
Falon French, WDNR Intake Specialist (Falon.French@Wisconsin.gov)
Rob Davis, WDNR CAFO Engineer (Robert.Davis@Wisconsin.gov)
Tony Salituro, WDNR CAFO Engineer (Anthony.Salituro@Wisconsin.gov)
Nick Peltier, Brown County LCD (Nick.Peltier@browncountywi.gov)
David Wetenkamp, Manitowoc County LCD (davidwetenkamp@manitowoccountywi.gov)
Kevin Beckard, AgSource (kevin.beckard@agsource.com)

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Tony Evers, Governor
Adam N. Payne, Secretary
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September 6, 2023

Jason Pansier
Ledgeview Farms
3870 Dickenson Road
De Pere, WI 54115

WPDES Permit No. WI-0065421-01-1
Brown County

Subject: Permit Reissue Walkover Inspection Report

Dear Mr. Pansier:

On August 1, 2023 the Department of Natural Resources (department) conducted a permit reissuance walkover inspection of Ledgeview Farms. Results and photos are included in the enclosed report. Page 6 of the enclosed report includes a list of "Action Items". Please review this section carefully.

Ledgeview Farms' current WPDES permit will expire February 29, 2024.

As of the date on this letter, no permit application for reissuance has been received. The department received verification from Jennifer Keuning of GHD that shows all documents have been uploaded to the permitting system, but technical issues have prevented them from signing and submitting the application. It is noted that a help ticket was submitted on 08/31/2023 and that as of 09/01/2023 it has been assigned to tech support for resolution.

If you have any questions regarding this letter or your WPDES permit requirements, please contact me at (920) 360-0794 or at holly.stegemann@wisconsin.gov.

Sincerely,

Holly Stegemann
Agricultural Runoff Management Specialist

Enclosure: Ledgeview Farms Reissuance Inspection Report

Electronic CC:
Nick Peltier, Jon Bechle - Brown County LWD
Kevin Beckard - AgSource
Joe Baeten, Falon French – DNR
Jennifer Keuning - GHD

CAFO Compliance Report (2023/09/06)

Inspection Date: 08/01/2023
Inspection Type: Permit Reissuance
Operation Name: Ledgeview Farms
WPDES Permit No. WI-0065421-01-1

Operation Address: Main Farm: 3870 Dickenson Road, De Pere, WI 54110
Heifer Farm: 3688 Lime Kiln Road, De Pere, WI 54110
Glenmore Site: Corner of Crystal Ln and Glenmore Rd (SW¼, NW¼ of T22N, R21E, Section 2)

On-Site Representative(s): Janson Pansier, Owner/Operator

DNR Staff / Report Writer: Holly Stegemann, Agricultural Runoff Management Specialist

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On August 1, 2023 Stegemann met with Pansier to conduct a WPDES reissuance inspection of Ledgeview Farms and follow up on the completed abandonment of the heifer feed storage area and runoff controls. All facilities currently covered under Ledgeview Farms' WPDES permit were inspected, including the main site, heifer site, and Glenmore site. No liquid precipitation had fallen 24 hours prior to the inspection. Follow up items are requested on page 5.

Figure 1. Aerial overview of Ledgeview Farms main site. Approximate contaminated flow paths are indicated with orange arrows. Blue arrows indicate stormwater flow paths. Pink arrows indicate manure transfer lines.

Figure 2. Aerial overview of Ledgeview Farms heifer site. Feed storage area and leachate basin have been abandoned.

Figure 3. Aerial overview of Ledgeview Farms Glenmore site. Approximate contaminated flow paths are indicated with orange arrows.

Figure 4. Aerial overview of Ledgeview Farms main and heifer sites in relation to surface water features. Green areas represent designated wetlands.

SITE OBSERVATIONS

Feedlot Runoff

Ledgeview Farms utilizes two concrete feed lots, one at the main site and one at the heifer site. The concrete lot at the main site is attached to the heifer barn, just north of the calf barn. Lot runoff is contained by a concrete curb with a load out area on the east end that is cleaned out daily.

The concrete lot at the heifer site is contained by a short concrete wall that provides nearly complete containment and separation from the yard area. The west side of the feedlot discharges directly into a concrete collection/reception tank that is located on the west end of the feedlot for waste collection from the feedlot. A metal gate separates the feedlot area from the tank. Waste collected in this tank is removed and directly land applied to fields on an as needed basis.

Feedlot areas are managed to not have current or past indicators of discharges.

Calf Barn

Ledgeview Farms utilizes a calf barn on the south side of the production area that consists of open pens that are bedded with straw. The used bedding is removed approximately once per week or on an as-needed basis and is stacked on the east end of the barn. The stacked bedding is loaded onto trucks for direct land application to approved fields. The south side of the calf barn is open, and a concrete lane extends approximately 25 feet south towards the ditch. A collection basin catches runoff and is emptied as needed by pumping the runoff into a tank on a skid loader that is dumped into the manure transfer line in the large freestall barn that flows to WSF 1. At the time of inspection, the collection basin was full and some contaminated runoff was noted around the collection basin in the vegetated ditch.

Waste Storage Facilities
Ledgeview Farms utilized two waste storage facilities for liquid manure, one on the main site and one in Glenmore. Solid manure is stacked on the concrete ramps of the liquid storages with future plans to stack manure on the feed storage area in Glenmore during the winter with any runoff flowing into the storage adjacent to the pad.

WSF 1 is an earthen lined facility with a concrete ramp, located on the main site, that was evaluated in 2017 and updated to meet permit requirements in 2018. WSF 1 has a maximum operating level of 4,425,820 gallons. WSF 1 accepts manure and process wastewater from the adjacent freestall barn. At the time of inspection, permanent markers and safety fencing were present. Observations of woody vegetation were discussed with Pansier.

WSF 2 is an earthen lined facility with a concrete side and bottom, located at the Glenmore site. Construction of WSF 2 was completed in 2022 and has a maximum operating level of 16,870,140 gallons. WSF 2 accepts process wastewater from the adjacent feed storage area. At the time of inspection, permanent markers and safety fencing were present. Notable erosion channels were observed on the south side of the storage due to the amount of stormwater that flows across the bare ground to the east of the feed pad where feed pad where pad expansions are planned.

Solid and liquid waste storage facilities are managed to not have current or past indicators of discharges (includes headland stacking sites). Solid and liquid waste storage structures are well-maintained, in good repair, and in compliance with permit requirements. Liquid waste storage facilities have permanent markers installed.

Process Wastewater (other than feed storage area leachate/runoff)
Process wastewater is pumped from the parlor to WSF 1. Process wastewater sources (milking center, wash water, etc.) are managed to not have current or past indicators of discharges.

Feed Storage Area Runoff
Ledgeview Farms utilizes one feed storage area located at the Glenmore site. Feed is stored under plastic on a concrete pad is pitched to convey leachate and runoff to WSF 2. At the time of inspection, only about half of the planned feed pad was constructed (R-2020-0180). Observations of leachate pooled around the edges of the pad were noted. Stegemann spoke to Pansier about housekeeping practices which included keeping plastic on the pad with some space around the edge to allow the runoff controls to operate as designed. The area to the east of the pad had not been constructed and was cleared of vegetation with multiple large erosion channels. One channel flowed next to the concrete pad, conveying stormwater runoff to WSF 2. Stegemann showed Pansier the erosion occurring in the berm of WSF 2 due to the amount of water being conveyed from the open area and discussed options for correcting the damage.

The heifer site feed storage area abandonment had been completed with feed cleared from the pad and the leachate basin filled in with soil and seeded down. The tile lines around the pad are still in place and the pump still hooked up. When asked why the basin was not filled in above grade, Pansier stated that they left a small area to collect stormwater so the driveway is not flooded out when it rains.

Animal Mortality Disposal
Animal mortalities are picked up as needed by Circle R Mink Ranch. Animal mortalities are managed to not have current or past indicators of discharges.

Ancillary Service Areas
Preventative maintenance actions and visual inspections are occurring to minimize pollutant discharges from ancillary service and storage areas (i.e. storm water conveyance systems, driveways, etc.).

RECORDS REVIEW

The permittee has current WPDES Permit and Nutrient Management Plan onsite.

The permittee provided complete production site inspection records that are required to be retained.
The permittee provided adequate documentation that the facility has a minimum of 180 days of liquid manure storage capacity.
The permittee provided land application records to demonstrate compliance with nutrient management plan requirements.
The permittee has copies of their emergency response and monitoring and inspection plans onsite.
The permittee is up to date on required reporting and actions as specified in the Schedules section of permit.

SUMMARY

Areas of Concern

1. Calf barn runoff collection has the potential to overflow and lead to an unauthorized discharge
2. Woody vegetation around WSF 1 has the potential to impact the integrity of the berm and liner which could lead to an unauthorized discharge
3. Erosion channels in berm of WSF 2 have the potential to impact the integrity of the berm which could lead to an unauthorized discharge
4. Feed and plastic placed over the edges of the Glenmore feedpad has the potential to lead to an unauthorized discharge

Permit Violations
None

Action Items

- Photo log documents actions already taken by Ledgeview Farms on 08/21/2023 to address woody vegetation from WSF 1 and patches made to the eroded channels in the southern berm of WSF 2.
- Review the operation and maintenance plan for the Glenmore feed storage area to ensure proper placement of feed and correct operation of leachate runoff controls.

Items for Next Permit Term
Calf barn runoff collection system evaluation and/or submittal of plans and specifications

Photo #:	1695
Date/Time of Photo:	08/01/2023 11:37
Photo By:	Stegemann
Photo Location:	Main Site Outdoor Lot

Photo Description: View of main site outdoor heifer lot, looking west.

Photo #:	1693
Date/Time of Photo:	08/01/2023 11:37
Photo By:	Stegemann
Photo Location:	Main Site Outdoor Lot

Photo Description: View of loadout area on west side of outdoor lot, looking north.

Photo #:	1641
Date/Time of Photo:	08/01/2023 11:10
Photo By:	Stegemann
Photo Location:	Heifer Site Outdoor Lot

Photo Description: View of outdoor lot at the heifer site, looking northwest.

Photo #:	1643
Date/Time of Photo:	08/01/2023 11:11
Photo By:	Stegemann
Photo Location:	Heifer Site Outdoor Lot

Photo Description: View of outdoor lot at the heifer site looking north.

Photo #:	1647
Date/Time of Photo:	08/01/2023 11:12
Photo By:	Stegemann
Photo Location:	Heifer Site Outdoor Lot

Photo Description: View of loadout area for outdoor lot at the heifer site, looking northwest.

Photo #:	1649
Date/Time of Photo:	08/01/2023 11:12
Photo By:	Stegemann
Photo Location:	Heifer Site Outdoor Lot

Photo Description: View of loadout area for outdoor lot at the heifer site, looking northwest.

Photo #:	1703
Date/Time of Photo:	08/01/2023 11:40
Photo By:	Stegemann
Photo Location:	Calf Barn Main Site

Photo Description: View of calf barn, looking east. Arrows indicate approximate contaminated runoff flow paths.

Photo #:	1707
Date/Time of Photo:	08/01/2023 11:41
Photo By:	Stegemann
Photo Location:	Calf Barn Main Site

Photo Description: View of runoff from the calf barn crossing the concrete to the vegetated ditch. Runoff hits a small channel dug in the ditch along the concrete and is collected in a dug out collection basin. Arrows indicate approximate contaminated runoff flow paths.

Photo #:	1708
Date/Time of Photo:	08/01/2023 11:41
Photo By:	Stegemann
Photo Location:	Calf Barn Main Site

Photo Description: View of calf barn collection basin. Arrows indicate approximate contaminated runoff flow paths.

Photo #:	1709
Date/Time of Photo:	08/01/2023 11:42
Photo By:	Stegemann
Photo Location:	Calf Barn Main Site

Photo Description: View of calf barn collection tank. Runoff is pumped from basin to the tank that is emptied into the manure transfer system in the large freestall barn. Photo direction, southeast.

Photo #:	1710
Date/Time of Photo:	08/01/2023 11:43
Photo By:	Stegemann
Photo Location:	Main Site Freestall

Photo Description: View of where calf barn runoff is dumped into the manure transfer system that flows to WSF 1. Arrows indicate approximate contaminated runoff flow paths.

Photo #:	1711
Date/Time of Photo:	08/01/2023 11:45
Photo By:	Stegemann
Photo Location:	WSF 1

Photo Description: View of WSF 1 outlet from freestall barn, looking west.

Photo #:	1713
Date/Time of Photo:	08/01/2023 11:45
Photo By:	Stegemann
Photo Location:	WSF 1

Photo Description: View of concrete ramp of WSF 1, looking northwest.

Photo #:	1712
Date/Time of Photo:	08/01/2023 11:45
Photo By:	Stegemann
Photo Location:	WSF 1

Photo Description: View of WSF 1 permanent marker circled in red.

Photo #:	1718
Date/Time of Photo:	08/01/2023 11:47
Photo By:	Stegemann
Photo Location:	WSF 1

Photo Description: View of WSF 1 looking west.

Photo #:	1724
Date/Time of Photo:	08/01/2023 11:49
Photo By:	Stegemann
Photo Location:	WSF 1

Photo Description: View of woody vegetation along WSF 1, looking northeast.

Photo #:	1676
Date/Time of Photo:	08/01/2023 11:24
Photo By:	Stegemann
Photo Location:	WSF 2

Photo Description: View of WSF, looking northeast.

Photo #:	1687
Date/Time of Photo:	08/01/2023 11:30
Photo By:	Stegemann
Photo Location:	WSF 2

Photo Description: View of concrete side of WSF 2, looking north.

Photo #:	1680
Date/Time of Photo:	08/01/2023 11:25
Photo By:	Stegemann
Photo Location:	WSF 2

Photo Description: View of erosion channel on south berm of WSF 2.

Photo #:	1655
Date/Time of Photo:	08/01/2023 11:20
Photo By:	Stegemann
Photo Location:	Glenmore FSA

Photo Description: View of plastic over the edge of the concrete pad, looking north.

Photo #:	1663
Date/Time of Photo:	08/01/2023 11:21
Photo By:	Stegemann
Photo Location:	Glenmore FSA

Photo Description: View of feed under plastic. Arrows indicate approximate runoff flow paths. Photo direction, north.

Photo #:	1659
Date/Time of Photo:	08/01/2023 11:20
Photo By:	Stegemann
Photo Location:	Glenmore FSA

Photo Description: View of feed and plastic right on edge of feedpad with leachate on base soil. Photo direction, south.

Photo #:	1664
Date/Time of Photo:	08/01/2023 11:22
Photo By:	Stegemann
Photo Location:	Glenmore FSA

Photo Description: View of leachate on base ground on south end of feedpad.

Photo #:	1673
Date/Time of Photo:	08/01/2023 11:23
Photo By:	Stegemann
Photo Location:	Glenmore FSA

Photo Description: View of clay placed on unfinished east side of concrete pad. Photo taken standing on southeast corner, looking north. Arrows indicate approximate contaminated runoff flow paths.

Photo #:	1636
Date/Time of Photo:	08/01/2023 10:24
Photo By:	Stegemann
Photo Location:	Heifer FSA

Photo Description: View of feed removed from feed storage area at the heifer site, looking west.

Photo #:	1635
Date/Time of Photo:	08/01/2023 10:24
Photo By:	Stegemann
Photo Location:	Heifer FSA

Photo Description: View of feed removed from the feed storage area at the heifer site, looking west.

Photo #:	1622
Date/Time of Photo:	08/01/2023 10:21
Photo By:	Stegemann
Photo Location:	Heifer Leachate Basin

Photo Description: View of the leachate basin, filled in and reseeded. Photo direction, northwest.

Photo #:	1625
Date/Time of Photo:	08/01/2023 10:21
Photo By:	Stegemann
Photo Location:	Heifer Leachate Basin

Photo Description: View of the leachate basin, filled in and reseeded. Photo direction, east.

Photo #:	1631
Date/Time of Photo:	08/01/2023 10:22
Photo By:	Stegemann
Photo Location:	Heifer FSA

Photo Description: View of pump for abandoned feed storage area at the heifer site.

Photo #:	1632
Date/Time of Photo:	08/01/2023 10:22
Photo By:	Stegemann
Photo Location:	Heifer FSA

Photo Description: View of pump for abandoned feed storage area at the heifer site.

Photo #:	3565
Date/Time of Photo:	08/21/2023 13:13
Photo By:	Pansier
Photo Location:	WSF 1

Photo Description: View of woody vegetation removed from WSF 1, looking west.

Photo #:	0749
Date/Time of Photo:	08/01/2023 8:03
Photo By:	Pansier
Photo Location:	Calf Barn

Photo Description: View of calf barn runoff collection basin pumped down and cleaned out.

Photo #:	4150
Date/Time of Photo:	08/21/2023 13:12
Photo By:	Pansier
Photo Location:	WSF 2

Photo Description: View of concrete poured in erosion channels on the southern berm of WSF 2.

Photo #:	1259
Date/Time of Photo:	08/21/2023 13:12
Photo By:	Pansier
Photo Location:	WSF 2

Photo Description: View of concrete poured in erosion channels on the southern berm of WSF 2.