

Permit Fact Sheet

General Information

Permit Number	WI-0066516-02-0
Permitted Facility Name and Address	Otto Farms LLC 4012 Otto Lane, Valders, WI 54245
Permit Term	August 01, 2025 to July 31, 2030
Discharge Location	4012 Otto Lane; Valders, WI 54245 (T18N, R22E, Sec. 10)
Receiving Water	Mud Creek within the Lower Manitowoc River Watershed, and groundwaters of the state

Animal Units

	Current AU		Proposed AU (Note: If all zeroes, expansions are not expected during permit term)		
	Mixed	Individual	Mixed	Individual	Date of Proposed Expansion
Animal Type					
Dairy Calves (under 400 lbs.)	35	0	0	0	
Milking and Dry Cows	1217	1243	0	0	
Total	1252	1243	0	0	

Facility Description

Otto Farms is an existing Concentrated Animal Feeding Operation (CAFO) located in the Valders, WI. Otto Farms consists of one production site and is owned and operated by Drew Otto. Otto Farms A current dairy herd size of 1393 animal units (869 milking & dry cows, 176 calves). Currently, there are no planned herd expansions in the next permit term. The herd will annually generate approximately 15,098,120 gallons of manure and process wastewater and 691 tons of solid manure. The facility has 187 days of liquid storage capacity and is projected to have 473 days after proposed construction is completed. Otto Farms LLC currently has 1,069.05 acres (818.64 owned and 250.41 controlled through contracts, rental agreements or leases, or under manure agreements) of which 988.3 are spreadable acres.

Substantial Compliance Determination

Enforcement During Last Permit: A notice of non-compliance (NON) was issued on July 24, 2020, for failing to meet permit schedule timelines. The NON was closed on September 23, 2024, after the schedule items were completed.

After a desk top review of all discharge monitoring reports, land application reports, compliance schedule items, and a site visit on 12/13/2023, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Trenton Brenny (WDNR CAFO Specialist) on 5/30/2025.

Sample Point Designation For Animal Waste

Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)	
001	WSF 1 - Sample point 001 is for liquid waste storage facility 1 (WSF 1) located at the Main Farm. WSF 1 includes a sand settling channel that overflows into the main basin of WSF 1. WSF 1 is located directly west of WSF 2 and has a capacity of 4,817,913 gallons. WSF 1 was constructed in 2002 and accepts manure and process wastewater from the freestall barns. WSF 1 was evaluated in 2021 and will require upgrades over the upcoming permit term - see Schedules section for details.	
002	WSF 2 - Sample point 002 is for liquid waste storage facility 2 (WSF 2) located at the Main Farm. WSF 2 is an earthen storage that is located directly east of WSF 1 and has a capacity of 4,290,366 gallons. WSF 2 was constructed in 2002 and accepts manure and process wastewater from WSF 1. WSF 2 was evaluated in 2021 and will require upgrades over the upcoming permit term -see Schedules section for details.	
003	WSF 3 - Sample point 003 is for liquid waste storage facility 3 (WSF 3) located at the Main Farm. WSF 3 is an above-ground steel storage structure that is located west of WSF 4 and has a usable capacity of 488,369 gallons. WSF 3 was constructed in 1990 and accepts manure and process wastewater from WSF 1. WSF 3 will be evaluated over the upcoming permit term - see Schedules section for details.	
004	WSF 4 - Sample point 004 is for liquid waste storage facility 4 (WSF 4) located at the Main Farm. WSF 4 is an above-ground steel storage structure that is located east of WSF 3 and has a usable capacity of 262,542 gallons. WSF 4 was constructed in 1990 and accepts manure and process wastewater from the calf barns. WSF 4 will be evaluated over the upcoming permit term - see Schedules section for details.	
006	WSF 6 - Sample point 006 is for liquid waste storage facility 6 (WSF 6) located at the Main Farm. WSF 6 is an underbarn concrete storage structure that is located under the calf barn and has a usable capacity of 100,000 gallons. WSF 6 was constructed in 1990 and accepts manure and process wastewater from the calf barn. WSF 6 will be abandoned over the upcoming permit term - see Schedules section for details.	
007	WSF 7 - Sample point 007 is for liquid waste storage facility 7 (WSF 7) located at the Main Farm. WSF 7 is a concrete underbarn storage structure that is located south of WSF 4 and has a usable capacity of 200,000 gallons. WSF 4 was constructed in 1990 and no longer accepts manure or process wastewater. WSF 7 will be abandoned during the upcoming permit term - see Schedules section for details.	
008	WSF 8 - Sample point 008 is for proposed liquid waste storage facility 8 (WSF 8) to be constructed at the Main Farm. WSF 8 is the proposed first stage in a two-stage storage with WSF 9, and will receive manure and process wastewater from the freestall barns. Engineering plans and specifications for WSF 8 have been approved by the department.	
009	WSF 9 - Sample point 009 is for proposed liquid waste storage facility 9 (WSF 9) to be constructed at the Main Farm. WSF 9 is the proposed second stage in a two-stage storage with WSF 8 and will receive manure and process wastewater from the freestall barns. Engineering plans and specifications for WSF 9 have been approved by the department.	
010	WSF 10 - Sample point 010 is for liquid waste storage facility 10 (WSF 10) located at the Main Farm. WSF 10 is a concrete storage structure that has a capacity of 744,484 gallons. WSF 10 is located to the southeast of the feed storage area.WSF 10 receives wastewater from the feed storage area and WSF 11. WSF 10 was constructed in 2024 in accordance with permit conditions and department approval.	
011	WSF 11: Sample point 011 is for solid waste storage facility 11 (WSF 11) located at the Main Farm. WSF 11 is a concrete storage located on the northeast corner of the production area. The facility has a capacity of 1,000 tons and was constructed in 2024. This storage accepts manure and process wastewater from the animal barns onsite.	

Sample Point Designation For Animal Waste		
Sample Point Number	Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)	
013	Sample point 013 is for and manure solids removed from bottom of liquid waste storage facilities. This includes manure-laden sand solids, manure fiber solids, etc. Representative samples shall be taken from each waste storage facility.	
014	Sample point 014 is for solid manure stacked in approved headland stacking locations. Representative samples shall be taken of this manure prior to land application. Note: Headland stacking sites are subject to production site discharge limitations; weekly visual monitoring is required during use of stacking sites to ensure discharges to waters of the state do not occur.	
015	Sample point 015 is for solid manure sources that are directly land applied and not stored in a waste storage facility. This includes solid sources such as calf hutch manure, maternity pen bedpack, heifer bedpack, steer manure, etc. Representative samples shall be taken for each manure source type.	
016	Sample point 016 is for visual monitoring and inspection of the feed storage area and associated runoff control system located at the Main Farm. 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 program.	
017	Sample point 017 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 manure and process wastewater handling systems. Weekly inspections are required and shall be recorded according to the monitoring program.	

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. 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 be submitted to the Department for approval.

The permittee currently has approximately 187 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 1,393 animal units, it is estimated that approximately 15,098,120 gallons and 691 tons of solid manure of manure and process wastewater will be produced per year. The permittee owns *approximately* 818 acres of cropland and rents about 250 acres. Given the rotation commonly used by the permittee, 988 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 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- WSF 1; 002- WSF 2; 003- WSF 3; 004- WSF 4; 006- WSF 6; 007- WSF 7; 008- WSF 8; 009- WSF 9; 010- WSF 10

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 005 was removed from the permit, as it had been properly abandoned during the previous permit term.

1.1.2 Explanation of Operation and Management Requirements

Liquid manure and process wastewater is required to be sampled twice per month that land application occurs. Samples are to be analyzed for the parameters listed in the table above. Land application shall occur in accordance with the operation’s approved nutrient management plan. Liquid manure storage structures shall be inspected according to the operation’s monitoring and inspection program. Inspection findings shall be submitted to the department annually on January 31.

1.2 Sample Point Number: 011- WSF 11; 013- Settled Solid Manure; 014- Headland Stacking Manure; 015- Miscellaneous Solid Manure

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 Point 012 was removed from the permit, as it had been properly abandoned during the previous permit term.

1.2.2 Explanation of Operation and Management Requirements

Solid manure is required to be sampled once per quarter that land application occurs. Samples are to be analyzed for the parameters listed in the table above. Land application shall occur in accordance with the operation's approved nutrient management plan. Solid manure storage structures shall be inspected according to the operation's monitoring and inspection program. Inspection findings shall be submitted to the department annually on January 31.

1.3 Sample Point Number: 016- Feed Storage & Runoff Controls and 017- Storm Water Runoff Controls

1.3.1 Changes from Previous Permit

No changes were made to Sample Point 016 or 017.

1.3.2 Explanation of Operation and Management Requirements

Sample Points 016 and 017 are required to be inspected in accordance with the operation's monitoring and inspection program. Results shall be submitted to the department annually on January 31.

2 Schedules

2.1 Emergency Response Plan

Required Action	Due Date
Develop Emergency Response Plan: Develop a written Emergency Response Plan within 30 days of permit coverage, available to the Department upon request.	08/01/2025

2.2 Explanation of Schedules

This schedule item is typical and required for all CAFO permittees.

2.3 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 submit a proposed monitoring and inspection program within 60 days of the effective date of this permit.	09/01/2025

2.4 Explanation of Schedules

This schedule item is typical and required for all CAFO permittees.

2.5 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.	

2.6 Explanation of Schedules

This schedule item is typical and required for all CAFO permittees.

2.7 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).	
Management Plan Annual 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
Management Plan Annual 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
Management Plan Annual 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
Management Plan Annual 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
Management Plan Annual 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.	

2.8 Explanation of Schedules

This schedule item is typical and required for all CAFO permittees.

2.9 Manure Storage Facility - Engineering Evaluation (WSF 1 & 2)

WSF 1 & 2 Upgrades

Required Action	Due Date
Retain Expert: Experts have been retained	
Written Report: Evaluations have been submitted and reviewed by the Department. Upgrades are required to bring WSF 1 & WSF 2 into compliance.	
Plans and Specifications: Submit plans and specifications for Department review and approval in accordance with Chapter 281.41, Wis. Stats., and Chapter NR 243, Wis. Adm. Code, to permanently correct any adverse manure storage conditions.	
Corrections and Post Construction Documentation: Complete construction on the manure storage facilities that permanently corrects any adverse conditions in concurrence with and approval by the Department, by the specified Date Due. Submit post construction documentation within 60 days of completion of the project.	12/31/2025

2.10 Explanation of Schedules

This schedule item addresses the need to complete required upgrades to WSF 1 and WSF 2, which would bring the WSFs into permit compliance.

2.11 Manure Storage Facility - Engineering Evaluation (WSF 3 & 4)

WSF 3 & WSF 4

Required Action	Due Date
Retain Expert: Experts have been retained.	
Written Report: Submit a written report evaluating the existing manure storage facility's ability to meet the conditions in the Production Area Discharge Limitations and Manure and Process Wastewater Storage subsections and s. NR 243.15, Wis. Adm. Code. (See Standard Requirements for report details.)	12/31/2025
Plans and Specifications: Submit plans and specifications for Department review and approval in accordance with Chapter 281.41, Wis. Stats., and Chapter NR 243, Wis. Adm. Code, to permanently correct any adverse manure storage conditions.	03/01/2026
Corrections and Post Construction Documentation: Complete construction on the manure storage facility that permanently corrects any adverse conditions in concurrence with and approval by the Department, by the specified Date Due. Submit post construction documentation within 60 days of completion of the project.	12/31/2026

2.12 Explanation of Schedules

This schedule item addresses the need to complete required evaluations of WSF 3 and WSF 4, to ensure that the WSFs meet permit requirements.

2.13 Manure Storage Facility - Abandonment (WSF 6 & 7)

Required Action	Due Date
Abandonment Plan: The Abandonment Plan has been Approved by the Department	
Complete Abandonment: Complete abandonment as approved by the Department.	11/30/2025

2.14 Explanation of Schedules

WSF 6 and WSF 7 are no longer in use and the farm plans to remove them from the production area.

2.15 Permit Application Submittal

The permittee shall file an application for permit reissuance in accordance with NR 200, Wis. Adm. Code.

Required Action	Due Date
Permit Application Submittal: Submit a complete permit application to the Department no later than 180 days prior to permit expiration.	01/31/2030

2.16 Explanation of Schedules

This schedule item is typical and required for all CAFO permittees

Attachments

Map(s)

Plan Approval Letter(s)

Prepared By: Trent Brenny

Agricultural Runoff Management Specialist

Date: 5/30/2025





May 30, 2025

Manitowoc County
Approval

Drew Otto
Otto Farms
4012 Otto Lane
Valders, WI 54245

SUBJECT: Conditional Approval of Otto Farms LLC Nutrient Management Plan, WPDES Permit
No. 0066516-02-0

Dear Drew Otto:

After completing a review of Otto Farms LLC 2025-2029 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 Otto 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.

FINDINGS OF FACT

The Department confirms that:

1. A current dairy herd size of 1393 animal units (869 milking & dry cows, 176 calves). Currently there are no planned expansions in the next permit term.
2. Manure generation and spreading records indicate your herd will annually generate approximately 15,098,120 gallons of manure and process wastewater and 691 tons of solid manure in the first year of the permit term.
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 Otto Farms LLC currently has 1,069.05 acres (818.64 owned and 250.41 controlled through contracts, rental agreements or leases, or under manure agreements) of which 988.3 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 2025-2029 Otto 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 are prohibited from receiving applications of manure or process wastewater due to insufficient soil sampling density:
 - H 03

If Otto 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.

3. 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.
4. 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.
5. 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, Otto Farms LLC may use the following equation to adjust the first year available nitrogen when applications are injected or incorporated within 1 hour:

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

6. Otto Farms LLC shall record daily manure applications by using form 3200-123A.
7. Otto 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 form 3200-123.

WINTER SPREADING

8. Liquid manure applications during winter conditions, as defined by NR 243.14(7), Wis. Adm. Code, are prohibited with the exception of emergency applications.
9. The following field(s) are approved for winter spreading solid manure, emergency applications of liquid manure and frozen liquid manure:
 - B 01
 - JS
 - T 01
10. 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.

11. Winter applications of liquid manure shall only occur under emergency situations, after notifying the Department and receiving verbal approval.
12. 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

13. No headland stacking sites are approved.

NR243.143/151.075 SILURIAN BEDROCK PERFORMANCE STANDARDS

14. Manure generated by Otto 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.

- HS02
- HS03
- Schuler01
- Schuler02
- Schuler03

MANURE & PROCESS WASTEWATER IRRIGATION

15. Irrigation of manure or process wastewater is prohibited.

SUBMITAL AND RECORDKEEPING REQUIREMENTS

16. 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

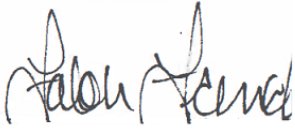
17. The animal unit to acreage ratio exceeds 1:1, and the nutrient management plan utilizes greater than 90 percent of the spreadable acreage through the permit term. This can lead to overutilization of the land base and rising soil test P levels. It is recommended to monitor the soil nutrient content and adjust manure and fertilizer application rates, to ensure that fields do not build soil test P.
18. Manure sampling is required to be completed at the following intervals to meet permit requirements:
 - One quarterly sample per solid manure source when hauling takes place.
 - Two liquid samples per month for each source when hauling takes place.

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,

A handwritten signature in black ink, appearing to read 'Falon French', with a stylized, cursive script.

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

cc: Trent G Brenny, WDNR Agricultural Runoff Management Specialist (Trenton.Brenny@wisconsin.gov)
Joe B Baeten, WDNR Agricultural Runoff Supervisor (Joseph.Baeten@wisconsin.gov)
Ben Uvaas, WDNR Acting Agricultural Runoff Section Manager (benjamin.uvaas@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)
Tabatha A Davis, WDNR CAFO Engineer (tabatha.davis@wisconsin.gov)
David Wetenkamp, Manitowoc County (davidwetenkamp@manitowoccountywi.gov)
Scott Fleming, Rock River Laboratory (scott_fleming@rockriverlab.com)
File



March 18, 2025

FILE REF: R-2024-0134
WPDES Permit #: WI-0066516

Drew Otto
Otto Farms LLC
4012 Otto Lane
Valders, WI 54245

Subject: Days of Storage Review for Otto Farms LLC SE¼ of T18N, R22E, Section 10 in Liberty Township, Manitowoc County – NO ADDITIONAL ACTION REQUIRED

Dear Drew Otto:

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 Clark Fox, Outland Design/Ruekert & Mielke on May 2nd, 2024 on behalf of Otto 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 Otto Farms LLC currently has 187 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 1252. The liquid waste volumes are based on the NRCS spreadsheet and other estimated or calculated values for a collection period of 365 days. All runoff from the feed storage area up to the 25-yr 24-hr storm and leachate are collected in the existing runoff collection facility WSF 10. Under the proposed conditions, the farm is proposing to add a new large waste storage facility (WSF 8/9) and a new stacking pad (WSF 11). The proposed stacking pad will have all runoff collected up to the 25-yr 24-hr storm in the existing WSF 10. In addition, the forebay for WSF 1 will be abandoned. Under the described proposed conditions, Otto Farms LLC is projected to have 473 days of liquid waste storage.

(Existing Conditions) Otto Farms LLC

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	9,608,724
Feed Storage Leachate	74,800
Feed Storage Runoff Collected	1,595,243
Net Precipitation on Storage Surface(s)	1,996,621
TOTAL:	13,275,388

Total Liquid Waste Storage Capacity (gallons)						
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	4,817,913	358,606	214,461		568,757	3,676,089
#2	4,290,366	270,626	177,812		1,123,705	2,718,223
#10	744,484		37,348	209,739	102,838	394,559
Total MOL Vol:						6,788,871
Days of Storage:						187

(Proposed Conditions) Otto Farms LLC

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	9,608,724
Feed Storage Leachate	74,800
Feed Storage Runoff Collected	1,595,243
Stacking Pad Runoff Collected	286,100
Net Precipitation on Storage Surface(s)	3,533,255
TOTAL:	15,098,122

Total Liquid Waste Storage Capacity (gallons)						
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	4,817,913	358,606	191,920		512,926	3,754,461
#2	4,290,366	270,626	177,812		1,123,705	2,718,223
#8/9	14,402,172		370,199		1,290,405	12,741,568
#10	744,484		37,348	248,594	102,838	355,704
Total MOL Vol:						19,569,956
Days of Storage:						473

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



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