Permit Fact Sheet

General Information

Permit Number	WI-0066397-01-1
Permittee Name and Address	Pasanen Farms LLC 9421 W Pasanen Road Exeland WI 54835
Permitted Facility Name and Address	Pasanen Farms LLC 9421 W Pasanen Road Exeland WI 54835
Permit Term	May 01, 2022 to April 30, 2027
Discharge Location	Same as facility address
Receiving Water	Brunet River (WBIC 2378400) within the Weirgor Creek and Brunet River watershed of the Upper Chippewa River Basin, and groundwaters of the state
Discharge Type	Existing discharge

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.)	60	0	0	0	05/03/2026
Milking and Dry Cows	1680	1716	3080	3146	05/03/2026
Heifers (400 lbs. to 800 lbs.)	210	350	0	0	05/03/2026
Heifers (800 lbs. to 1200 lbs.)	385	350	0	0	05/03/2026
Total	2335	1716	3080	3146	

Facility Description

Pasanen Farms LLC is an existing Concentrated Animal Feeding Operation (CAFO) located in the Township of Meadowbrook, Sawyer County. Pasanen Farms LLC consists of two production sites: the Main Dairy Site located at 9421 W Pasanen Road, Exeland WI 54835 and the Heifer Barn Site located at 9468 W Pasanen Road, Exeland WI 54835. The operation is owned and operated by Scott Pasanen with a current herd size of 2,335 animal units (1,200 milking/dry cows, 700 heifers, and 300 calves). The operation is proposing to expand to approximately 3,080 animal units (2,200 milking/dry cows) by May of 2026.

The operation is proposing to add one waste storage facility to store manure and process wastewater generated at the site. Existing and proposed manure storage structures will provide the operation with 301 days of liquid waste storage, based on expanded animal numbers during the permit term. This calculation includes the operations proposed upgrade to the existing feed pad runoff collection system to collect 100% of leachate/runoff.

Substantial Compliance Determination

Enforcement During Current Permit:

- None.

Compliance During Current Permit:

- The facility submitted an Emergency Response Plan on August 15, 2022.
- The facility submitted a Monitoring and Inspection Plan on August 15, 2022.
- The facility submitted Annual Reports due by January 31 in 2023, 2024, and 2025.
- The facility submitted Annual NMP Updates due by March 31 in 2023, and 2024.
- One land application inspection (May 10, 2023) did not find permit violations.
- One production site inspection (July 9, 2024) did not find permit violations.

This facility is considered in substantial compliance with their current permit.

Compliance determination made by Todd Prill on February 24, 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 (liquids) – Sample point 001 is for liquids from WSF1. The facility is in the middle portion of the main dairy site. It was built in 1999 as an earthen berm concrete lined in-ground pit and an estimated MOL capacity of 1,714,933 gallons (dimensions of 240 feet long by 170 feet wide by 10 feet deep). This structure was built according to NRCS plans and specifications at the time of construction. An engineering evaluation during the permit term has been requested by the DNR, see Schedules section of the permit. WSF1 receives liquid dairy manure scraped from the alleyways of the milking cow barn and process wastewater from the milking parlor. The pit is emptied into waste storage facility 4 as needed with a pump and underground transfer system. Representative samples only need to be taken when land application occurs.	
002	WSF 2 - Dry Cow Barn Pit (liquids) – Sample point 002 is for liquids from WSF 2 - Dry Cow Barn Pit. The facility is in the southeastern portion of the main dairy site. It was built in 1990 with cast in place concrete floor and vertical walls. Dimensions and capacity are unknown. It is not known if this structure was built according to plans and specifications. An engineering evaluation during the permit term has been requested by the DNR, see Schedules section of the permit. WSF 2 receives liquid dairy manure and surface runoff from a 3,600 square feet outdoor feedlot next to a dry cow barn. It is emptied as needed and	

Sample Point Designation For Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
	land applied or placed in WSF 4. Representative samples only need to be taken when land application occurs.	
003	WSF 3 – Heifer Barn Storage (liquids) – Sample point 003 is for liquids from WSF 3 – Heifer Barn Storage. The facility is in the central portion of the heifer barn site. It was built in 2009 as vertical precast concrete walls on three sides with a sloping poured concrete floor and an estimated MOL capacity of 231,401 gallons (dimensions of 70 feet long by 70 feet wide and a maximum depth of 8 feet). It is not known if this facility was built according to plans and specifications. An engineering evaluation during the permit term has been requested by the DNR, see Schedules section of the permit. WSF 3 receives solid dairy manure scraped from the alleyways of the nearby heifer barn. The pit is emptied as needed and land applied or placed in WSF 4.	
004	WSF 4 (liquids) – Sample point 004 is for liquids from WSF 4. The facility is in the western portion of the main dairy site. It was built in 2014 as an earthen berm concrete lined in-ground pit and an estimated MOL capacity of 5,495,925 gallons (dimensions of 330 feet long by 230 feet wide by 16 feet deep). This structure was designed by Auth Consulting and Associates and built according to plans and specifications meeting NRCS Standard 313, December 2005. An engineering evaluation during the permit term has been requested by the DNR, see Schedules section of the permit. WSF 4 receives liquid dairy manure and process wastewater from WSF 1, WSF 2, and WSF 3. This facility is emptied in the fall and spring. A drop in agitator is used to mix solids and liquids prior to emptying.	
005	Misc. Solid Manure (solids) – Sample point 005 is for miscellaneous waste solids directly land applied from the production area of the main dairy site. This includes pen bedpack and any settled waste solids directly land applied from liquid waste storage facilities. Representative samples shall be taken for each nutrient source type when land application occurs.	
006	Headland Stacking Sites (solids) – Sample point 006 is for solid manure land applied from approved headland stacking sites. Representative samples shall be taken prior to land application. Stacks are defined as part of the production area and therefore subject to the discharge limitations of this permit. Weekly inspections of stack runoff controls are required and shall be recorded according to a monitoring program.	
007	Feed Storage Areas - Sample point 007 is for visual monitoring and inspection of the feed storage pads and associated runoff control systems. The facility is in the western portion of the main dairy site. This storage pad (multiple construction dates) keeps haylage and corn silage in several concrete feed bunkers with an overall size estimated at 84,100 square feet. Floors slope to the middle, then west to a runoff collection area. The feed storage pad consists of 6 to 8-inch-thick concrete with precast concrete exterior and interior walls. The runoff collection system consists of “first flush” liquids being pumped to WSF 1 with remaining liquids pumped to a vegetated treatment area located west of WSF 4. This structure was designed by Auth Consulting and Associates and built according to plans and specifications meeting NRCS Standard 313, December 2005 and NRCS Standard 634. A new runoff collection system is planned for installation in 2026.	
008	WSF 5 (liquids) – Sample point 008 is for liquids from WSF 5 (engineering WSF 4). The facility will be located the southwestern portion of the main dairy site. It will be built in 2025 in a rectangular shape with top dimensions of 375 feet wide by 520 feet long by 16 feet deep for a total volume below the MOL of 15,351,366 gallons (2025 DNR calculation). It is an in-ground earthen berm, concrete lined pit with a concrete access ramp. This facility was designed by Auth Consulting and Associates with Plans and Specifications approved by the Department of Natural Resources on February 21, 2025. This storage	

Sample Point Designation For Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
	facility will receive liquid dairy manure and process wastewater from WSF 4 through an underground pipe. Manure will be removed from this facility in the spring, summer, and fall. An agitation boat will be used to mix solids and liquids prior to emptying.	

1 Livestock Operations - Proposed Operation and Management

Production Area Discharge Limitations

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

Runoff Control

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

Manure and Process Wastewater Storage

The permit requires the operation to have adequate storage for manure and process wastewater and that storage or containment facilities are designed, operated, and maintained to prevent overflows and discharges to waters of the state. To prevent overflows, the permittee must maintain levels of materials in liquid storage or containment facilities at or below certain levels including a one-foot margin of safety that can never be exceeded. If any upgrading or modifications to the storage facilities are necessary, formal engineering plans and specifications must be submitted to the Department for approval.

Based on the expanded animal numbers, the permittee would have approximately 301 days of storage for liquid manure. The permittee will be required to design and construct 180 days of liquid manure storage by December 1, 2025. Once the permittee has 180 days of liquid manure storage, it 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 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 2,335 animal units and current feed pad collection system, it is estimated that approximately 17.4 million gallons of manure and process wastewater will be produced per year. The permittee owns approximately 1,914 acres of cropland and controls an additional 422.6 acres through contracts, rental agreements or leases, or manure agreements. 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. 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 - Dry Cow Barn Pit; 003- WSF 3 - Heifer Barn Storage; 004- WSF 4, and 008- WSF 5

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 008 (WSF 5) has been added to the permit.

1.1.2 Explanation of Operation and Management Requirements

Waste levels in liquid storages are required to be recorded weekly. Contents shall be sampled twice per month that land application occurs. Sampling results shall be submitted annually with the operation's nutrient management plan update. Manure and process wastewater shall be land applied in accordance with the operation's approved nutrient management plan.

1.2 Sample Point Number: 005- Misc. Solid Manure; 006- Headland Stacking Sites

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	

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

1.2.1 Changes from Previous Permit

None.

1.3 Sample Point Number: 007- Feed Storage Areas

1.3.1 Changes from Previous Permit

None.

1.3.2 Explanation of Operation and Management Requirements

Runoff control system shall be monitored on a weekly basis. Results shall be submitted with the operation's annual report. Process wastewater from the feed storage area will be stored in WSF 2 or WSF 3.

2 Schedules

2.1 Emergency Response Plan

Required Action	Due Date
Develop Emergency Response Plan: Develop a written Emergency Response Plan within 60 days of permit coverage, available to the Department upon request.	06/30/2022

2.2 Monitoring & Inspection Program

Required Action	Due Date
Proposed Monitoring and Inspection Program: Consistent with the Monitoring and Sampling Requirements subsection, the permittee shall submit a proposed monitoring and inspection program within 60 days of the effective date of this permit.	06/30/2022

2.3 Annual Reports

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.	01/31/2023
Submit Annual Report #2: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2024
Submit Annual Report #3: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2025
Submit Annual Report #4: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2026
Submit Annual Report #5: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2027
Ongoing Annual Reports: Continue to submit Annual Reports until permit reissuance has been completed.	

2.4 Nutrient Management Plan

Required Action	Due Date
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.	03/31/2023
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.	03/31/2024
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.	03/31/2025
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.	03/31/2026
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.	03/31/2027
Ongoing Management Plan Annual Updates: Continue to submit Annual Updates to the Nutrient Management Plan until permit reissuance has been completed.	

2.5 Manure Storage Facility - Installation

New manure pit with a MOL of 15 million gallons.

Required Action	Due Date
Complete Installation: Complete construction of the manure storage facility. The facility shall be functional and in operation by the specified Date Due. Post construction documentation shall be submitted within 6 months of completion of the project.	12/01/2025

2.6 Runoff Control System - Installation

New runoff control system to replace existing system.

Required Action	Due Date
Plans and Specifications: If feed pad runoff system modernization requires substantial improvements, submit plans and specifications for Department review and approval in accordance with Chapter 281.41, Wis. Stats., and Chapter NR 243, Wis. Adm. Code. See Standard Requirements for plan content information.	12/31/2025
Complete Installation: Complete construction of runoff control system. System shall be functional and in operation by the specified Date Due. Post construction documentation shall be submitted within 6 months of completion of the project.	12/31/2026

2.7 Manure Storage Facility - Engineering Evaluation

Required Action	Due Date
Written Report: Submit a written report with: 1.Narrative describing the structure characteristics (dimensions, capacity, liner type, etc.), a summary of site assessment information collected (soil test pits, groundwater, bedrock) prior to construction, and rationale why structure is/is not constructed to NR 243 standards. 2.Supporting as-built construction information. 3.Documentation of any cracks or defects from recent visual inspection of empty structure. 4.Updated Operation and Maintanance plan.	12/31/2022
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.	12/31/2023
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.	12/31/2024

2.8 Submit Permit Reissuance Application

Required Action	Due Date
Reissuance Application: Submit a complete permit reissuance application 180 days prior to permit expiration.	10/31/2026

Other Comments

The intent of this permit modification is to add Sample Point 008 (WSF 5) to the existing permit to meet the 180-days liquid manure storage requirement to support the proposed increase in animal units.

Attachments

Sample Point Map (February 2025)

Nutrient Management Plan Approval Letter (February 21, 2025)

Days of Storage Approval Letter (February 21, 2025)

Public Notice (February 2025)

Prepared By: Todd Prill **Agricultural Runoff Management Specialist** **Date: February 24, 2025**

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

PUBLIC NOTICE OF AVAILABILITY OF A NUTRIENT MANAGEMENT PLAN AND INTENT TO REISSUE A WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM (WPDES) PERMIT No.WI-0066397-01-1

Permittee: Pasanen Farms LLC, 9421 W Pasanen Road, Exeland, WI, 54835

Receiving Water And Location: Brunet River (WBIC 2378400) within the Weirgor Creek and Brunet River watershed of the Upper Chippewa River Basin, and groundwaters of the state.

Brief Facility Description : Pasanen Farms LLC is an existing Concentrated Animal Feeding Operation (CAFO) located in the Township of Meadowbrook, Sawyer County. Pasanen Farms LLC consists of two production sites: the Main Dairy Site located at 9421 W Pasanen Road, Exeland WI 54835 and the Heifer Barn Site located at 9468 W Pasanen Road, Exeland WI 54835. The operation is owned and operated by Scott Pasanen with a current herd size of 2,335 animal units (1,200 milking/dry cows, 700 heifers, and 300 calves). The operation is proposing to expand to approximately 3,080 animal units (2,200 milking/dry cows) by May of 2026. The operation is proposing to add one waste storage facility to store manure and process wastewater generated at the site. Existing and proposed manure storage structures will provide the operation with 301 days of liquid waste storage, based on expanded animal numbers during the permit term. This calculation includes the operations proposed upgrade to the existing feed pad runoff collection system to collect 100% of leachate/runoff.

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

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

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

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

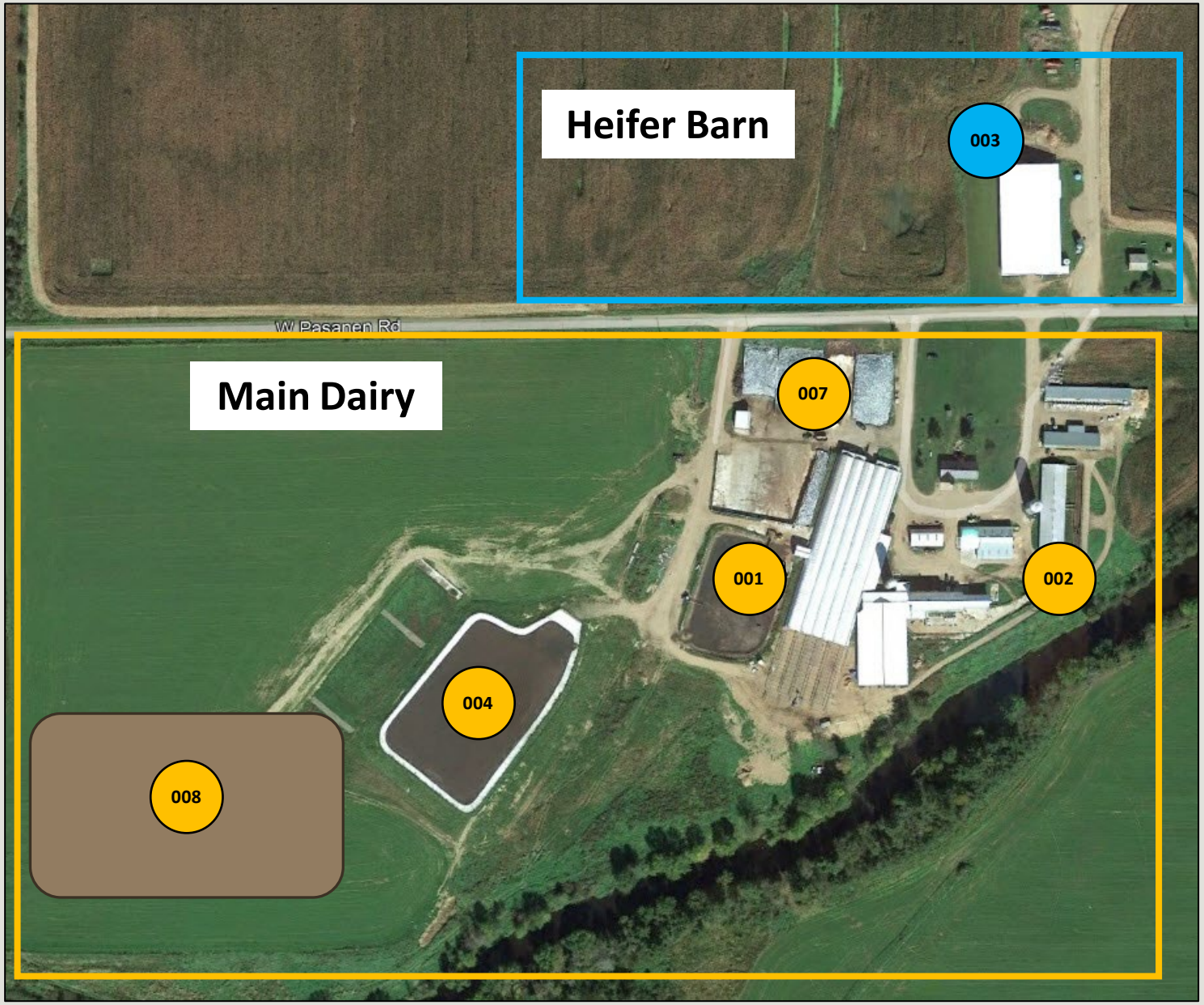
Information on file for this permit action, including the draft permit and fact sheet (if required), the operation's nutrient management plan and application may be inspected and copied at the permit drafter's office, Monday through Friday (except holidays), between 9:00 a.m. and 3:30 p.m. Please call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

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

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

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

Pasanen Farms LLC Sample Points



Sample Points – Main Dairy and Heifer Barn

- 001 WSF 1
- 002 WSF 2 – Dry Cow Barn Pit
- 003 WSF 3 – Heifer Barn Storage
- 004 WSF 4
- 007 Feed Storage Areas
- 008 WSF 5

Sample Points – Facility Wide

- 005 Misc. Solid Manure
- 006 Headland Stacking Sites

Aerial Photo Source: Google Earth Imagery February, 2025

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
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Toll Free 1-888-936-7463
TTY Access via relay - 711

February 21, 2025

FILE REF: R-2024-0120
WPDES Permit #: WI-0066397

Scott Pasanen
Pasanen Farms LLC
9421 W Pasanen Road
Exeland, WI 54835

Subject: Days of Storage Review for Pasanen Farms LLC T37N, R06W, Section 18 in Meadowbrook Township, Sawyer County

Dear Scott Pasanen:

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 David McDaniel, ACA on April 14, 2024 with revisions received on October 3, 2024 and again on January 22, 2025 on behalf of Pasanen 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 the following:

- Without the construction and use of waste storage facility 4, Pasanen Farms LLC is not in compliance with its permit requirements to have and maintain 180 days of liquid manure storage as required by s. NR 243.14(9) Wis. Adm. Code.

Days of Available Liquid Waste Storage: The submitted information states that Pasanen Farms LLC has 158 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 2,335. The liquid waste volumes are based on the NRCS spreadsheet and other estimated or calculated values for a collection period of 365 days. The farm collects 0.25 inches of first flush runoff leachate and process wastewater from the feed storage area in permanent waste storage facilities. Additional runoff from the feed storage area goes to the Vegetated Treatment Area. The farm collects all runoff, up to the 25-year, 24-hour storm from the site's feedlots.

Existing Condition:

EXISTING 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	293,216		15,608	9,556	36,652	231,400
#2	2,334,097	170,544	128,249	19,111	289,793	1,726,400
#3	6,433,791		243,670	139,554	554,642	5,495,925
					Total MOL Vol:	7,453,725
					Days of Storage:	**156**

EXISTING Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	12,194,243
Parlor Wastewater	2,299,500
Feed Storage Leachate	149,600
Feed Storage Runoff Collected	796,230
Feedlot Runoff	268,221
Net Precipitation on Storage Surface(s)	1,726,026
TOTAL:	**17,433,820**

Phase 1 Expansion

The submitted information states that Pasanen Farms LLC will have 370 days of storage following Phase 1 of expansion. Phase 1 of the expansion includes constructing waste storage facility 4, project R-2024-0241, which was approved by the department on December 2, 2024. Phase 1 includes an increase in herd size and animal units provided for the calculation is 2,520. At Phase-1, the farm will continue to collect leachate and first flush from the feed storage area in permanent runoff collection facilities as well as runoff from one of the farm's feedlots.

PHASE 1 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	293,216		15,608		36,652	240,956
#2	2,334,097	170,544	128,249	337,635	289,793	1,407,876
#3	6,433,791		243,670		554,642	5,635,479
#4	17,304,625		588,784		1,364,475	15,351,366
					Total MOL Vol:	22,635,677
					Days of Storage:	**370**

Phase 1 Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	13,514,490
Parlor Wastewater	3,679,200
Feed Storage Leachate	224,400
Feed Storage Runoff Collected	796,230
Feedlot Runoff	71,526
Net Precipitation on Storage Surface(s)	4,069,640
TOTAL:	**22,355,486**

Phase 2 Expansion

The provided information states Pasanen Farms will have 301 days of storage following Phase 2 of the expansion. This calculation uses an expanded herd size of 3,080 animal units. In Phase 2 of the expansion, the farm plans to collect all feed storage area leachate and runoff, up to the 25-year, 24-hour storm in permanent waste storages. The farm continues to collect runoff from the feedlot on the facility.

Phase 2 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	293,216		15,608		36,652	240,956
#2	2,334,097	170,544	128,249	337,635	289,793	1,407,876
#3	6,433,791		243,670		554,642	5,635,479
#4	17,304,625		588,784		1,364,475	15,351,366
					Total MOL Vol:	22,635,677
					Days of Storage:	**301**

Phase 2 Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	16,517,710
Parlor Wastewater	4,496,800
Feed Storage Leachate	299,200
Feed Storage Runoff Collected	1,986,825
Feedlot Runoff	71,526
Net Precipitation on Storage Surface(s)	4,069,640
TOTAL:	**27,441,701**

Should you have any questions, please contact Tabby 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

Tabby Davis
CAFO Review Engineer
Watershed Management Program

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Tony Evers, Governor
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February 21st, 2025

Sawyer County
Approval

Scott Pasanen
Pasanen Farms, LLC
9421 W Pasanen Road
Exeland, WI 54835

SUBJECT: Permit Modification Approval of Pasanen Farms, LLC Nutrient Management Plan, WPDES Permit No. 0066397-01.1

Dear Scott Pasanen:

After completing a review of Pasanen Farms, LLC 2025-2028 Nutrient Management Plan (NMP) the Wisconsin Department of Natural Resources (Department) is providing conditional approval of the permit modification 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 Pasanen 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 2,335 animal units (1,200 milking & dry cows, 700 heifers, and 300 calves). There are two phases of expansion as follows: a planned herd size of 2,520 animal units (1,800 milking and dry cows) by 2025, and 3,080 animal units (2,200 milking & dry cows) by 2026.
2. Manure generation and spreading records indicate your herd currently generates 17,235,958 gallons of manure and process wastewater and 583 tons of solid manure. In the two phases of expansion, the projected manure is as follows: 22,355,486 gallons of manure and process wastewater in 2025 and 27,318,408 gallons of manure and process wastewater in 2026 once full expansion has been reached.
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 Pasanen Farms, LLC currently has 2,336.6 acres (1,914 owned and 422.6 controlled through contracts, rental agreements or leases, or under manure agreements) of which 2,329.6 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 2025-2028 Pasanen 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:
   - Delbert Hoffman (expired soil test)
   - Emmas (expired soil test)
   - Phils (expired soil test)

   If Pasanen 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 NH_4-N, percent NO_3-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, Pasanen Farms, LLC may use the following equation to adjust the first year available nitrogen when applications are injected or incorporated within 1 hour:

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

6. Pasanen 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.

7. Pasanen 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:
   - Kevin North
   - Martha's West
   - George Dantzman Center
   - Scotts
   - Rodgers
   - Sadjeras
   - Reeds
   - George Dantzman South

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. The following headland stacking site is located on a perched water table which makes it approvable with strict limits on timing of use as outlined below:
    - Sadjeras Headland Stack #6
    - Solids content of manure can be >32% or 16-32%
    - 16-32% solids can be used in February only, not eligible for use any other time of year.
    - >32% solids can be used in January, February, and June- December only when the ground is not frozen or snow covered. **Not eligible for March use***
    - Site can be used for 1 year out of every 2 years (>32% solids) or 1 out of every 3 years (16-32% solids)
    - Sites can be used to stack for a maximum period of 8 months and should not exceed 40,000 cubic feet in size. Sites must remain a minimum of 100' apart when in active use.

14. The following headland stacking sites are approved only for use with >32% solids only, this is due to the slope of these sites which range up to 6%. Slope verification is necessary to use with <32% solids and must be submitted back to the department for approval.
    - Reed's Headland Stack #3
    - Marthas Headland Stack #4
    - Scott's Headland Stack #2
    - Kevin North Headland Stack #1
    - Solids content of manure must be >32% solids.
    - May be used during February and March, or any other period of the year when the ground is not frozen or snow covered.
    - Site can be used for 1 year out of every 2 years.
    - Sites can be used to stack for a maximum period of 8 months and should not exceed 40,000 cubic feet in size. Sites must remain a minimum of 100' apart when in active use.

15. The following headland stack is denied due to not meaning depth to subsurface saturation on 648B soil:
    - Rodgers Headland Stack #5

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.
18. Manure sampling is subject to the following requirements to remain in compliance with the farm's permit:
    - Solid manure sources **(including headland stacks)** must be sampled at a minimum frequency of one sample per quarter for each source when hauling takes place.

- Liquid manure sources must be sampled at a minimum frequency of 2 samples per calendar 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 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: Todd Prill, WDNR Agricultural Runoff Specialist (Todd.Prill@Wisconsin.gov)
Brad Johnson, WDNR Watershed Field Supervisor (Bradleya.Johnson@Wisconsin.gov)
Christopher Clayton, WDNR Runoff Management Section Chief (Christopherr.Clayton@Wisconsin.gov)
Aaron O'Rourke, WDNR Nutrient Management Program Coordinator (Aaron.Orourke@Wisconsin.gov)
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