Permit Fact Sheet

General Information

Permit Number	WI-0064971-03-0
Permittee Name	Snudden Farms LLC
Permitted Facility Addresses	Main Site: N815 Zenda Road, Lake Geneva, WI 53147 Heifer Site: N959 N Zenda Road, Lake Geneva, WI 53147
Permit Term	October 01, 2025 to September 30, 2030
Discharge Location	Unnamed tributaries within the White River and Nippersink Creek 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.)	72	0	72	0	06/01/2026
Milking and Dry Cows	3780	3861	4900	5005	06/01/2026
Heifers (400 lbs. to 800 lbs.)	930	1550	930	1550	06/01/2026
Heifers (800 lbs. to 1200 lbs.)	998	907	998	907	06/01/2026
Total	5780	3861	6900	5005	

Facility Description

Snudden Farms LLC is an existing Concentrated Animal Feeding Operation (CAFO) located in the Township of Linn in Walworth County. Snudden Farms LLC is owned and operated by Steve Snudden. The CAFO consists of a main site and an additional heifer site to the north. The Merwin site included in the previous permit is no longer in use by Snudden Farms LLC and therefore has been removed from the proposed permit. The current herd size is 5,780 animal units (2,700 milking & dry cows, 2,457 heifers, and 360 calves). The herd is proposed to expand to 6,900 animal units by the end of 2026. Snudden Farms currently produces approximately 49.3 million gallons of liquid manure and process wastewater, and approximately 7,000 tons of solid manure annually. After the expansion, it is estimated the liquid manure and process wastewater generated will increase to 60 million gallons annually. With the completion of the new waste storage facility, the total usable liquid storage capacity will be approximately 40.7 million gallons, or the capacity for approximately 247 days of storage. Snudden Farms owns and rents approximately 4,526 acres of cropland, of which 4,522.6 acres are available for manure application

Substantial Compliance Determination

Enforcement During Last Permit:

Multiple notices of noncompliance were issued for the following:

Section 2.5 Feed Storage Runoff Control System - Engineering Evaluation; plans and specifications, corrections, and post-construction documentation were not submitted by the permit deadline.

Section 2.7 Runoff Control System Evaluation; an engineering evaluation for Merwin Site Feedlot Runoff controls were not submitted to the department by the permit deadline.

Section 1.5 Ancillary Service and Storage Areas; On November 15, 2017, the department collected water quality samples of runoff from ancillary service and storage areas. The sample results show an exceedance of water quality standards and discharge to navigable waters from Snudden's production site. On April 8, 2021 the department collected additional water quality samples from the production area. The sample results showed exceedance of water quality standards and discharge to navigable waters from Snudden's production site.

Section 2.9.1.2 Design of BMPs; During a July 21, 2021 site inspection, the department observed one location where silt fence was installed on a portion of the perimeter. The site was ~50 acres, which indicated additional Best Management Practices (BMPs) needed to be implemented for that amount of sediment exposure.

Section 2.9.3.1 Installation of BMPs; During the July 21, 2021 site inspection, BMPs were not installed in all areas indicated on the plan. The silt fence did not meet the technical standard for installation.

Section 2.9.4 Maintenance of BMPs; During the July 21, 2021 site inspection, BMPs were not installed to the technical standard. In addition, they had been damaged from sediment overtaking the practices and required maintenance to correct had not been completed.

Section 3.1.2 Erosion Control Plan Requirements; The erosion control plan submitted to the department did not include all BMPs appropriate for site.

The department issued four citations for alleged violations of ch. NR 216, Wis. Adm. Code on October 10, 2021. Snudden paid the citations. On December 14, 2021, Snudden submitted post construction documentation for feed storage runoff controls. On June 6, 2022, Snudden submitted documentation that all animals have been moved off of the Merwin site and on to the main farm. Snudden stabilized the site as of June 2022. A notice of violation closeout was issued on June 15, 2022.

After a desk top review of all discharge monitoring reports, land app reports, compliance schedule items, and a site visit on July 31, 2025, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Kate Markiewicz, Permit Drafter on August 1, 2025.

Sample Point Descriptions

Sample Point Designation For Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
001	WSF 1: Sample point 001 is for liquid waste storage facility 1 (WSF 1) located at the main site. WSF 1 is a liquid-tight concrete lined storage located east of the freestall barns. The facility has a MOL of 1,860,891 gallons and was built in 2006. This storage accepts manure and process wastewater from barns and the milking parlor. Liquids from this facility are pumped to the new WSF 2.	
004	General Solid Manure: Sample point 004 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.	

Sample Point Designation For Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
005	Headland Stacking Solid Manure: Sample point 005 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.	
006	Feed Storage & Runoff Controls: Sample point 006 is for visual monitoring and inspection of the feed storage area and associated runoff control system at the main site. The feed storage area was constructed in 2022 with department approval. 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.	
007	WSF 4: Sample point 007 is for liquid waste storage facility 4 (WSF 4) located at the heifer site. WSF 4 is a concrete lined storage located east of the freestall barn. The facility has a capacity of 650,000 gallons and was built in 2008. This storage accepts manure and process wastewater from barn and calf hutch area.	
008	Sand Separation Area: Sample point 008 is for manure laden sand generated from the sand separation area at the main site that will be directly land applied or headland stacked from this structure.	
011	Storm Water Runoff Control: Sample point 011 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 waste water handling systems. Weekly inspections are required and shall be recorded according to the monitoring program.	
012	WSF 3: Sample point 012 is for liquid waste storage facility 3 (WSF 3) located at the main site. WSF 3 is a concrete lined storage located east of the freestall barn. The facility has a MOL of 19,549,834 gallons and was built in 2021 with department approval. This storage accepts process wastewater from the feed storage area and the new WSF 2.	
013	WSF 2 (New): Sample point 013 is for the new liquid waste storage facility 2 (WSF 2) located at the main site. Construction of WSF 2 began in 2025 and is a reconstruction of the former WSF 2 and WSF 3 into a single larger pit. It is designed to be a concrete lined storage facility with a MOL of 19,364,000 gallons. This waste storage facility will accept liquid manure and process wastewater from WSF 1 and flow via a transfer box to WSF 3.	
014	Solids Removed from Liquid Waste Storage Facility: Sample point 014 is for any 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.	

Permit Requirements

1 Livestock Operations - Proposed Operation and Management

Production Area Discharge Limitations

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

Runoff Control

The permit requires control of contaminated runoff from all elements of the production area to prevent a discharge of pollutants to navigable waters in accordance with the Production Area Discharge Limitations and to comply with surface water quality standards and groundwater standards. Beginning on the effective date of this permit, (if needed) interim measures shall be implemented to prevent discharges of pollutants to navigable waters. In addition, permanent runoff control system(s) shall be designed, operated and maintained in accordance with the requirements found in USDA Natural Resources Conservation Service standards and ch. NR 243, Wis. Adm. Code. If any upgrading or modifications to runoff controls are necessary, formal engineering plans and specifications must 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 8 months 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 5,780 animal units (2,700 milking & dry cows, 2,457 heifers, and 360 calves) and a planned herd size of 6,900 animal units (3,500 milking & dry cows, 2,457 heifers, and 360 calves) by 2027, it is estimated that approximately 49,342,153 gallons of manure and process wastewater and 7,000 tons of manure will be produced during the first permit year. It is projected that the herd will annually generate 60,261,657 gallons of manure and process wastewater and 7,000

tons of solid manure after the herd expansion is complete. The permittee owns *approximately* 920 acres of cropland and rents about 3,606 acres. Given the rotation commonly used by the permittee, 4,511.6 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. 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; 007- WSF 4; 012- WSF 3; 013- WSF 2 (New)

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 013 added for new Waste Storage Facility 2 (WSF 2). Sample points 002-old WSF 2 and 003-WSF 3 removed as these have been replaced with a the new WSF. Sample point 012 - WSF 5 is now called WSF 3. Descriptions have been updated to reflect these changes and better describe how the facilities function together.

1.1.2 Explanation of Operation and Management Requirements

Wastes shall be stored and land applied according to permit and nutrient management requirements.

1.2 Sample Point Number: 004- General Solid Manure ; 005- Headland Stacking Solid Manure; 008- Sand Separation Area, and 014- Solids Removed from Liquid WSF

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 014 added for any settled solids removed from liquid waste storage facilities.

1.2.2 Explanation of Operation and Management Requirements

Wastes shall be stored and land applied according to permit and nutrient management requirements.

1.3 Sample Point Number: 006- Feed Storage & Runoff Controls, and 011- Stormwater Runoff Controls

1.3.1 Changes from Previous Permit

Sample point 010 removed as the Merwin site is no longer in use. Sample point 009 Calf Hutch Area & Runoff Controls removed since calves are now raised under-roof.

1.3.2 Explanation of Operation and Management Requirements

The is no required sampling for the runoff controls. Rather, there is required inspection and routine maintenance that should be recorded on a monitoring and inspection form or calendar. A copy of the inspection records shall be submitted with the Annual Report.

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.	11/30/2025

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 30 days of the effective date of this permit.	11/30/2025

2.3 Manure Storage Facility - Installation of 180 Day Liquid Manure Storage

Required Action	Due Date
Complete Installation of new WSF 2 : Complete construction of the manure storage facility, WSF 2. The facility shall be functional and in operation by the specified Date Due. Post construction documentation shall be submitted within 60 days of completion of the project.	11/30/2025
Provide documentation of MOS/MOL Markers on WSFs: Provide photo documentation of permanent margin of safety (MOS) and maximum operating level (MOL) markers installed/reinstalled on all WSFs at the main site. At a mimumim, WSF 1, 2 & 3 should have a MOS markers, and WSF 1 & 3 should have MOL markers.	11/30/2025

2.4 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.	

2.5 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.	03/31/2026
Submit NMP Update #2: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2027
Submit NMP Update #3: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2028
Submit NMP Update #4: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2029
Submit NMP Update #5: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2030
Ongoing Management Plan Annual Updates: Continue to submit Annual Updates to the Nutrient Management Plan until permit reissuance has been completed.	

2.6 Submit Permit Reissuance Application

Required Action	Due Date
Reissuance Application: Submit a complete permit reissuance application 180 days prior to permit expiration.	04/03/2030

2.7 Explanation of Schedules

Schedules are included in the permit to monitor and fulfill requirements of permit discharge limitations, and to ensure compliance with s. NR 243, Wis. Admin. Code, requirements. Schedules for the following items have been incorporated into the permit:
The schedules contained in 2.1, 2.2, 2.4, 2.5, and 2.6 are standard permit schedules.

Schedule item 2.3 is being required in accordance with NR 243.17(3), Wis. Adm. Code, for maintaining 180 days of storage for liquid manure and NR 243.15(3), Wis. Adm. Code, for all liquid manure and process wastewater storage or containment facilities to have permanent markers for margin of safety and maximum operating level.

Other Comments

N/A

Attachments

Maps

Nutrient Management Plan Approval Letter

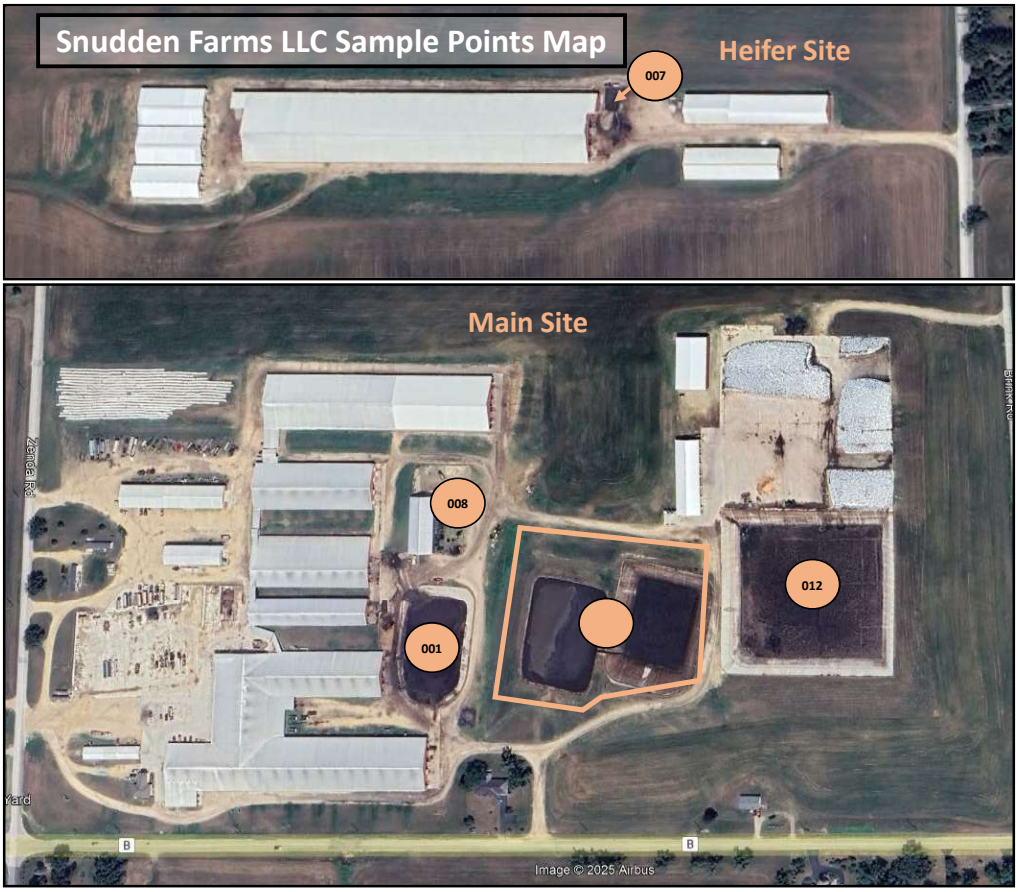
Days of Storage Review

Public Notice

Justification Of Any Waivers From Permit Application Requirements

N/A

Prepared By: Kate Markiewicz Agricultural Runoff Management Specialist Date: 8/1/2025



Sample Points – Site Specific

- 001 WSF 1
- 012 WSF 3
- 007 WSF 4
- 013 WSF 2 (New)
- 008 Sand Separation Area

Sample Points – Facility Wide

- 004 General Solid Manure
- 006 FSA & Runoff Controls
- 005 Headland Stacking Manure
- 011 Storm Water Runoff Controls
- 014 Solids Removed from WSFs

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Madison, WI 53707

Tony Evers, Governor
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June 12th, 2025

Walworth County
Approval

Steve Snudden
Snudden Farms, LLC
N764 Zenda Rd.
Lake Geneva, WI 53147

SUBJECT: Conditional Approval of Snudden Farms, LLC Nutrient Management Plan, WPDES Permit No. 0064971-03-0

Dear Steve Snudden:

After completing a review of Snudden 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 Snudden 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 5,780 animal units (2,700 milking & dry cows, 2,457 heifers, and 360 calves). A planned herd size of 6,900 animal units (3,500 milking & dry cows, 2,457 heifers, and 360 calves) by 2027.
2. Manure generation and spreading records indicate your herd will annually generate approximately 49,342,153 gallons of manure and process wastewater and 7,000 tons of solid manure in the first year of the permit term. By year 2026 once the herd has reached full expansion, it is projected that the herd will annually generate 60,261,657 gallons of manure and process wastewater and 7,000 tons of solid manure.
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 Snudden Farms, LLC currently has 4,526 acres (920 owned and 3,606 controlled through contracts, rental agreements or leases, or under manure agreements) of which 4,511.6 are spreadable acres. Additionally, this operation has 1,198 acres over the state line in Illinois which can be utilized for land applications.
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 Snudden 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. If existing fields yield a soil test results equal to or greater than 200 ppm P, those fields would be prohibited from receiving manure or process wastewater applications, unless you obtain Department approval in accordance with NR 243.14(5)(b)2., Wis. Adm. Code.

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

4. If manure sample results have a dry matter (DM) content less than 2.0% and the percent ammonium (NH_4^+) is greater than 75% of the total N, Snudden Farms, LLC may use the following equation to adjust the first-year available nitrogen when applications are injected or incorporated within 1 hour:

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

5. Snudden 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.

6. Snudden 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

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

8. The following field(s) are approved for winter spreading solid manure, emergency applications of liquid manure and frozen liquid manure:
   - Kikkoman
   - Saddan

9. The following field(s) are denied for winter spreading solid manure, emergency applications of liquid manure and frozen liquid manure:
   - Palmer 3-4 (this field does not exist as this exact name, Palmer 3 and Palmer 4 would not be suitable candidates for approval either due to limited spreading area)
   - Vanderstappen Hebron (no map provided)
   - Palmer 5 (no suitable spreading area)

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.

MANURE & PROCESS WASTEWATER IRRIGATION

14. Irrigation of manure or process wastewater is prohibited.

SUBMITAL AND RECORDKEEPING REQUIREMENTS

15. 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.
16. Please submit final revisions for any affected restriction maps and the updated narrative by no later than **July 2nd, 2025.**

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: Kate Markiewicz, WDNR Agricultural Runoff Management Specialist (kate,markiewicz@wisconsin.gov)
Michelle Scott, WDNR Watershed Field Supervisor (michelle.scott@wisconsin.gov)
Ben Uvaas, Acting WDNR Runoff Management Section Chief (benjamin.uvaas@wisconsin.gov)
Aaron O'Rourke, WDNR Nutrient Management Program Coordinator (aaron.orourke@wisconsin.gov)
Falon French, WDNR Intake Specialist (falon.french@wisconsin.gov)
Tabby Davis, WDNR CAFO Engineer (tabatha.davis@wisconsin.gov)
Mandy Bonneville, Walworth Co (mbonneville@co.walworth.wi.us)
Brian Mooney, Tuls Dairy (brian.mooney@tulsdairies.com)
File

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May 6, 2025

FILE REF: R-2024-0095
WPDES Permit #: WI-0064971

Steve Snudden
Snudden Farms LLC
N764 Zenda Road
Lake Geneva, WI 53147

Subject: Days of Storage Review for Snudden Farms LLCNW¼ of T01N, R17E, Section 27 in Linn Township, Walworth County – NO ADDITIONAL ACTION REQUIRED

Dear Steve Snudden:

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 Matt Wagner, Wagner Consulting and Agriculture LLC on April 3, 2024 with revisions received on April 25, 2025 on behalf of Snudden 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 Snudden Farms LLC has 235 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 5,780. The liquid waste volumes are based on the NRCS spreadsheet and other estimated or calculated values for a collection period of 365 days. All feedlot and feed storage area runoff, up to the 25-year, 24-hour storm is collected in permanent waste storages.

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.
#2	2,859,126	170,331	118,426	235,411	302,723	2,032,235
#3	4,327,629		157,173		402,286	3,768,170
#4	7,170,522		214,766		553,269	6,402,487
#5	22,249,933		577,419	619,896	1502784	19,549,834
					Total MOL Vol:	31,752,726
					Days of Storage:	**235**

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	31,346,003
Parlor Wastewater	7,270,070
Feed Storage Leachate	187,000
Feed Storage Runoff Collected	4,194,065
Feedlot Runoff	1,591,497
Net Precipitation on Storage Surface(s)	4,753,518
TOTAL:	**49,342,153**

Under proposed conditions, the farm is planning to expand herd size to 6,900 animal units, expand feedlots and add an additional waste storage facility, as described in project R-2025-0068, which is currently under review by the department. The operation will have 247 days of storage following expansion.

Proposed 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.
#2	2,859,126	170,331	118,426	406,755	302,723	1,860,891
#5	22,249,933		577,419	619,896	1502784	19,549,834
#6	21,447,546		614893		1468653	19,364,000
					Total MOL Vol:	40,774,725
					Days of Storage:	**247**

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	37,701,938
Parlor Wastewater	9,593,660
Feed Storage Leachate	187,000
Feed Storage Runoff Collected	4,194,065
Feedlot Runoff	2,749,895
Net Precipitation on Storage Surface(s)	5,835,099
TOTAL:	**60,261,657**

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

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Watershed Management Program

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Watershed Management Program

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Lindsay Motl; Walworth County Land Use and Resource Management (262) 741-7912;
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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-0064971-03-0

Permittee: Snudden Farms LLC, N764 Zenda Road, Lake Geneva, WI, 53147

Facility Where Discharge Occurs: Snudden Farms LLC, N815 Zenda Road Lake Geneva

Receiving Water And Location: Surface water and groundwater within the White River and Nippersink Creek Watershed

Brief Facility Description : Snudden Farms LLC is a proposed Concentrated Animal Feeding Operation (CAFO). Snudden Farms LLC is owned and operated by Steve Snudden. It currently has 5,780 animal units (2,700 milking & dry cows, 2,457 heifers, and 360 calves). Snudden Farms LLC has 4,526 acres (920 owned and 3,606 controlled through contracts, rental agreements or leases, or under manure agreements) of which 4,511.6 are available for application of manure and process wastewater. Additionally, this operation has 1,198 acres over the state line in Illinois which can be utilized for land applications.

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

Permit Drafter's Name, Address, Phone and Email: Kate Markiewicz, DNR, 1027 W St Paul Ave, Milwaukee, WI, 53233, (608) 893-4046, Kate.Markiewicz@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 (608) 893-4046 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.

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