Permit Fact Sheet

General Information

Permit Number	WI-0067425-01-0
Permittee Name and Address	Srnka Farms LLC E4127 Pheasant Rd Algoma WI 54201
Permitted Facility Name and Address	Srnka Farms LLC E4127 Pheasant Rd Algoma, WI 54201
Permit Term	May 01, 2025, to April 31, 2030
Discharge Location	(Dairy Site) N7599 Hemlock Road, Algoma, WI 54201 SE ¼ NE ¼ Section 33 TN25N R24E, Township of Lincoln, Kewaunee County (Home Site) E4127 Pheasant Rd, Algoma, WI 54201 NW ¼ NW ¼ Section 35 T25N R24E, Township of Lincoln, Kewaunee County (Terry Site) E3923 Pheasant Rd, Algoma, WI 54201 NW ¼ NE ¼ Section 34 T25N R24E, Township of Lincoln, Kewaunee County
Receiving Water	Unnamed tributaries within the Ahnapee River Water Shed, Lake Michigan 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.)	18	0	0	0	
Milking and Dry Cows	669	684	0	0	
Heifers (400 lbs. to 800 lbs.)	84	140	0	0	
Heifers (800 lbs. to 1200 lbs.)	143	130	0	0	
Total	914	684	0	0	

Facility Description

Srnka Farms LLC is an existing Concentrated Animal Feeding Operation in Kewaunee County, WI. Srnka Farms LLC is owned and operated by Scott Srnka, Terry Srnka, & Family. As of November 2024, it has 487 milking and dry cows,

160 heifers, and 90 calves (818 animal units). Srnka Farms LLC will annually generate approximately 8,789,002 gallons of liquid manure and process wastewater and 287 tons of solid manure. As of November 2024, Srnka Farms LLC has greater than the required minimum of 180 days of storage. Srnka Farms LLC has 1,383 acres in its approved nutrient management plan, of which 967 acres are rented or in contract agreements and 416 acres are owned. Srnka Farms LLC has 1,778 acres available for land application.

Substantial Compliance Determination

Enforcement During Last Permit: This is Srnka Farms LLC's first WPDES Permit. Srnka Farms LLC was issued several Notice of Violations for land application and nutrient management violations. Srnka Farms LLC was also issued a Notice of Discharge for land application discharges. Srnka Farms LLC was required to submit a WPDES Permit Application.

After a desk top review of all the WPDES application materials and a site visit on November 03, 2023, the department has decided to move forward with permit issuance for Srnka Farms LLC.

Compliance determination made by Brittiny Mueller, Regional CAFO Specialist on February 18, 2025.

Sample Point Designation for Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
001	Sample point 001 is for liquid waste storage facility 1 (WSF 1) located at The Dairy Site. WSF 1 is a clay lined with a concrete bottom storage located on the south side of the production site. WSF 1 has a capacity of 2,367,493 gallons and was constructed in 2012. This storage accepts manure and process wastewater from the freestall barn and feed storage area at the main site. WSF 1 will require an engineering evaluation, see Schedules section for due dates.	
002	Sample point 002 is for liquid waste storage facility 2 (WSF 2) located at The Dairy Site. WSF 2 is a clay lined with a concrete bottom storage located on the south side of the production site. WSF 2 has a capacity of 2,264,626 gallons and was constructed in 2012. This storage accepts manure and process wastewater from the freestall barn and feed storage area at the main site. WSF 2 will require an engineering evaluation, see Schedules section for due dates.	
003	Sample point 003 is for liquid waste storage facility 3 (WSF 3) located at The Home Farm. WSF 3 is a below ground vertical walled concrete storage located on the east side of the production site, under barn L1. WSF 3 has a capacity of 41,142 gallons and was constructed in 1997. This storage accepts manure from barn L1. WSF 3 was evaluated in 2024 and met permit requirements.	
004	Sample point 004 is for liquid waste storage facility 4 (WSF 4) located at The Dairy Site. WSF 4 is liquid tight concrete storage located south of the FSA at the Dairy Site. WSF 4 has a total capacity of 438,744 gallons and was constructed in 2024. This storage accepts runoff from the FSA at the Dairy Site. WSF 4 was evaluated in 2024 and met permit requirements.	
005	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 meet permit requirements.	

Sample Point Designation for Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
006	Sample point 006 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.	
007	Sample point 007 is for visual monitoring and inspection of the feed storage area and associated runoff control system at the Dairy Site. Proper operation and maintenance are 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 monitoring program.	
008	Sample point 008 is for visual monitoring and inspection of the feed storage area and associated runoff control system at the Home Farm. Proper operation and maintenance are 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 monitoring program. An abandonment plan for the FSA shall be submitted according to the Schedules section of the permit.	
009	Sample point 009 is for visual monitoring and inspection of outdoor vegetated areas located east of barn L1 at the Home Farm. Proper operation and maintenance are required to ensure sufficient vegetative cover, as defined in s. NR 243.03 is sustained. Quarterly inspections are required and shall be recorded according to monitoring program. Outdoor lot areas not managed to sustain vegetation are not permitted and shall be properly abandoned.	
010	Sample point 010 is for visual monitoring and inspection of the concrete outdoor lot and associated runoff control system located east of barn L2 at the Home Farm. Proper operation and maintenance are required to ensure discharges to waters of the state do not occur. Weekly inspections are required and shall be recorded according to monitoring program. Plans and specifications for upgrades or an abandonment plan for the feedlot and runoff control system shall be submitted according to the Schedules section of the permit.	
011	Sample point 012 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 are required to keep uncontaminated runoff diverted away from manure and process wastewater handling systems. Weekly inspections are required and shall be recorded according to 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 6 ½ 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.

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 487 milking and dry cows, 160 heifers, and 90 calves (818 animal units), it is estimated that approximately 8,789,002 gallons of liquid manure and process wastewater and 287 tons of manure and process wastewater will be produced per year. The permittee owns *approximately* 416 acres of cropland and rents about 967 acres. Given the rotation commonly used by the permittee, 1,178 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 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 (≥12% solids) on frozen or snow-covered ground during February and March. Beginning May 1, 2025, 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- WSF1; 002- WSF 2; 003- WSF 3; 004- WSF 4

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

This is Srnka Farms LLC's first permit. Sample points 001 will cover WSF 1, 002 will cover WSF 2, 003 will cover WSF 3, and 004 will cover WSF 4.

1.1.2 Explanation of Operation and Management Requirements

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

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

This is Srnka Farms LLC's first permit. Sample point 005 will cover any solid manure stacking. Sample point 006 will cover any solid manure not stored prior to land application.

1.2.2 Explanation of Operation and Management Requirements

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

1.3 Sample Point Number: 007- FSA; 008- FSA; 009- Outdoor Lot; 010- Concrete Outdoor Lot, and 011- Storm Water Conveyance

1.3.1 Changes from Previous Permit

This is Srnka Farms LLC's first permit. Sample point 007, 008, and 009, 010, and 011 will cover the feed storage area, the outdoor lot, the concrete outdoor lot, and storm water conveyance.

1.3.2 Explanation of Operation and Management Requirements

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

2 Schedules

2.1 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.	

2.2 Explanation of Schedules

Schedule 2.1 is included in the permit as a general permit requirement.

2.3 Emergency Response Plan

Required Action	Due Date
Develop Emergency Response Plan: Develop a written Emergency Response Plan within 30 days of permit coverage, submit to the Department upon request.	05/01/2025

2.4 Explanation of Schedules

Schedule 2.3 is included in the permit as a general permit requirement.

2.5 Monitoring & Inspection Program

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

Required Action	Due Date
Proposed Monitoring and Inspection Program: Consistent with the Monitoring and Sampling Requirements subsection, the permittee shall update and submit a proposed monitoring and inspection program within 60 days of the effective date of this permit.	06/01/2025

2.6 Explanation of Schedules

Schedule 2.5 is included in the permit as a general permit requirement.

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

Schedule 2.7 is included in the permit as a general permit requirement.

2.9 Submit Permit Reissuance Application

Required Action	Due Date
Reissuance Application: Submit a complete permit reissuance application 180 days prior to permit expiration.	09/30/2029

2.10 Explanation of Schedules

Schedule 2.9 is included in the permit as a general permit requirement.

2.11 Feed Storage Area - Abandonment

Required Action	Due Date
Abandonment Plan: Submit an abandonment plan for the feed storage area at the home farm to the Department for approval in accordance with USDA Natural Resource Conservation Services Technical Guide, Section IV, Standard 360 outlining the proposed method of abandonment.	08/01/2025
Complete Abandonment: Complete abandonment as approved by the Department.	03/31/2026

2.12 Explanation of Schedules

Schedule 2.11 is included in the permit to abandon the feed storage area at the Home Farm.

2.13 Runoff Control System - Installation

For the outdoor lots at the Home Farm and the Terry Site.

Required Action	Due Date
Plans and Specifications: Submit plans and specifications upgrades or an abandonment plan for a permanent runoff control system 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.	10/31/2025
Complete Installation or Abandonment: Complete construction of runoff control system or abandonment for both outdoor lots. System 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.	12/31/2026

2.14 Explanation of Schedules

Schedule 2.13 is included in the permit to install runoff controls or an abandonment plan for the outdoor lots at the Home Farm and Terry Site.

2.15 Manure Storage Facility - Engineering Evaluation

For waste storage facility 1 and 2 at the Dairy Site.

Required Action	Due Date
Retain Expert: Retain a qualified expert to complete an engineering evaluation for WSF 1 and WSF 2 at the Dairy Site and report the name of the expert to the Department.	06/01/2025
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.)	03/31/2026
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.	10/31/2026
Corrections and Post Construction Documentation: Complete construction on the manure storage	10/31/2027

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.	

2.16 Explanation of Schedules

Schedule item 2.15 is in the permit to submit an engineering evaluation on WSF 1 and WSF 2 at the Dairy Site.

Other Comments

N/A

Attachments

November 2, 2023, Permit Application Inspection Report
November 15, 2024, Conditional Nutrient Management Plan Approval
November 4, 2024, Days of Storage Review Letter
April 19, 2024, Environmental Analysis Questionnaire
Site Maps

Justification Of Any Waivers from Permit Application Requirements

None

Prepared By: Brittiny Mueller **Wastewater Specialist** **Date: FINAL**

CAFO Compliance Report (01/17/2024)

Inspection Date: November 2, 2023

Inspection Type: Permit Issuance

Operation Name: Srnka Farms LLC

Operation Address: E4127 Pheasant Rd, Algoma, WI 54201

On-Site Representative(s): Scott and Terry Srnka, Co-Owners

DNR Staff / Report Writer: James Salscheider, Agricultural Runoff Specialist

---

On November 2, 2023, James Salscheider, WDNR Agricultural Runoff Specialist, met with Scott and Terry Srnka, co-owners of Srnka Farms LLC, to conduct a WPDES permit issuance inspection at their dairy farm. Srnka Farms LLC has been designated as a medium-sized Concentrated Animal Feeding Operation due to repeated discharges of pollutants to waters of the state. Joining Scott and Terry was their agronomist, Jake Geiger, Tilth Ag. Srnka Farms LLC consists of three production sites, Site 1, Site 2, and the Milking Site. Site 1 is located at E4127 Pheasant Rd, Algoma, WI 54201, NW ¼ NW ¼ Section 35 T25N R24E, Township of Lincoln. Site 2 is located at E3923 Pheasant Rd, Algoma, WI 54201, NW ¼ NE ¼ Section 34 T25N R24E, Township of Lincoln. The Milking Site is located at N7599 Hemlock Rd, Algoma, WI 54201, SE ¼ NE ¼ Section 33 T25N R24E, Township of Lincoln. The weather during the inspection was sunny, dry, and approximately 37 degrees. Approximately 2 inches of snow accumulated the day before the inspection but melted before the inspection occurred.

Aerial Map 1. The aerial map above illustrates the production site at Site 1. The production site consists of one heifer barn, one bedpack barn and associated barnyard, one machine shed, one shop, one exercise lot, and one feed storage area with an associated interim runoff collection system. The aerial image was obtained from Kewaunee County GIS.

Aerial Map 2. The aerial map above illustrates the production site at Site 2. The production site consists of one barn with an associated concrete feed lot and an abandoned pasture area. A navigable waterway is located west of the production site. The aerial image was obtained from Kewaunee County GIS.

Aerial Map 3. The aerial map above illustrates the production site at Milking Site. The production site consists of one large freestall bar, one calf barn, one milking parlor, and two liquid waste storage facilities.

Aerial Map 4. The aerial map above illustrates surface water in relation to the three production sites at Srnka Farms LLC. Several unnamed intermittent streams, which are tributaries to Rio Creek, are located near the production sites. Several wetland complexes are mapped by the yellow shading. The aerial image was obtained from the DNR Surface Water Data Viewer.

SITE OBSERVATIONS

Feedlot Runoff

Feedlot areas are managed to not have current or past indicators of discharges.
Feedlot runoff control systems are not well-maintained, in good repair and in compliance with permit requirements.

At Site 1, Srnka Farms LLC utilizes one outdoor concrete feedlot located on the west side of the production site. Animals have unlimited access to the barnyard. Runoff flows south to a reception tank, where it is then augured into a manure spreader to be land applied in the spring, summer, and fall. Manure-laden water was observed underneath the manure spreader, outside of containment.

Srnka Farms LLC also utilizes one outdoor concrete feed lot Site 2. There are currently no runoff controls for the feedlot. Runoff from the feed lot flows south off the concrete lot and onto an abandoned earthen lot/pasture that is no longer being used. An unnamed navigable waterway (WBIC 5015658) flows northwest to southeast approximately 450 feet downslope from the concrete feedlot. There was no evidence of discharges to the stream observed during the inspection.

Photo 1. The concrete lot at Site 1, located on the west side of the production site. The yellow arrows represent the flow path of runoff towards the runoff controls. This photo was taken facing west.

Photo 2. The concrete lot at Site 1, located on the west side of the production site. The yellow arrows represent the flow path of runoff towards the runoff controls. This photo was taken facing northwest.

Photo 3. The concrete lot at Site 1, located on the west side of the production site. The yellow arrows represent the flow path of runoff towards the runoff controls. This photo was taken facing north.

Photo 4. The runoff collection basin that accepts runoff from the concrete lot at Site 1. Manure is then augured from the basin directly into land application equipment.

Photo 5. The runoff collection basin that accepts runoff from the concrete lot at Site 1. Manure is then augured from the basin directly into land application equipment.

Photo 6. The manure spreader that collects manure from the concrete barnyard at Site 1. Manure-laden water was present under the spreader.

Photo 7. The outdoor concrete feedlot at Site 2. The yellow arrow represents the flow path of runoff on the barnyard.

Photo 8. The feed lane associated with the outdoor feedlot at Site 2. This photo was taken facing south.

Photo 9. The concrete feedlot at Site 2. The yellow arrows represent the flow path of runoff on the lot.

Photo 10. The location where runoff leaves the concrete feed lot, located on the southwest corner of the lot. The yellow arrows represent the flow path.

Photo 11. The location where runoff leaves the concrete feed lot, located on the southwest corner of the lot. The yellow arrows represent the flow path.

Photo 12. The abandoned outdoor pasture where runoff from the feedlot flows through at Site 2. The yellow arrow represents the flow path. This photo was taken facing south.

Photo 13. Accumulated manure solids in the pasture area directly south of the concrete lot. This photo was taken facing east.

Photo 14. Accumulated manure solids in the pasture area directly south of the concrete lot. This photo was taken facing southwest.

Photo 15. The abandoned pasture area. There was not evidence of runoff further downslope of the concrete lot. This photo was taken facing north.

Photo 16. The abandoned pasture area. There was not evidence of runoff further downslope of the concrete lot. This photo was taken facing south.

Calf Hutch Areas

Calf hutch areas are managed to not have current or past indicators of discharges.
Runoff control systems are well-maintained, in good repair and in compliance with permit requirements.

Srnka Farms LLC does not utilize outdoor calf hutches to house calves. All calves are housed under roof at the Milking Site. A collection system is present to capture liquid waste that is generated in the calf barn. That waste is transferred to permanent storage.

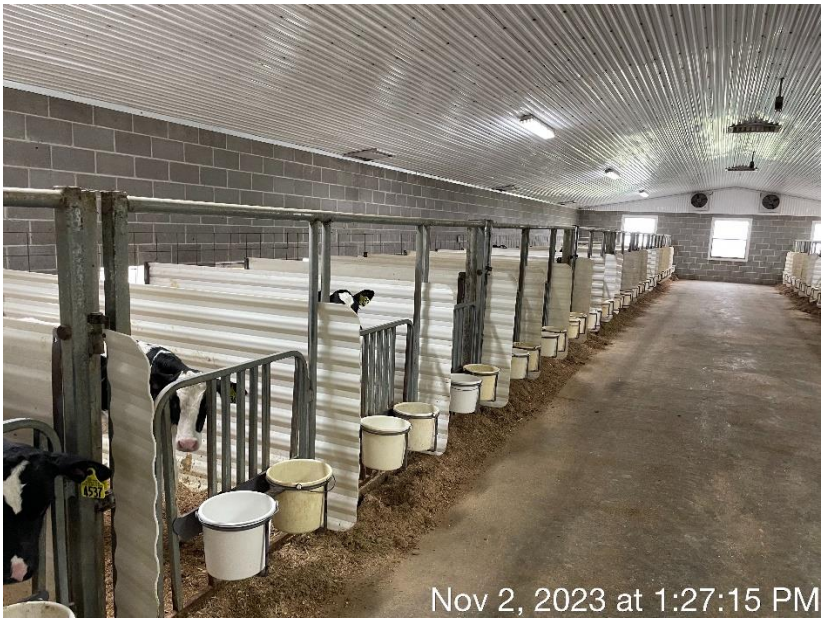


Photo 17. The calf barn located at the milking site. All calves at Srnka Farms LLC are housed under roof.

Photo 18. The floor drain that collects liquid waste from the calf pens in the calf barn, identified by the red arrow.

Waste Storage Facilities

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

Srnka Farms LLC utilizes three liquid manure storage facilities between the three sites. At Site 1, Srnka Farms uses an under-barn concrete tank to store manure generated by the heifers housed within the barn. The tank has a capacity of approximately 30,000 gallons of manure. The manure is augered into a manure spreader and land applied in the spring, summer, and fall. Scott Srnka stated during the inspection that the when the tank was constructed, bedrock was blasted out to create depth for the tank. Scott stated that he believes Kewaunee County LWCD required Srnka Farms LLC to place clay around the tank to provide a buffer between the storage tank and Silurian bedrock. Scott guessed that it might have been two feet of clay around the tank, but he was not sure. There is an abandoned slurry store located at Site 1, on the west side of the production site. The Slurrystore is no longer in-use, with one panel removed from the lowest row.

At the Milking Site, Srnka Farms LLC utilizes one two-stage liquid manure storage facility (WSF 1 and WSF 2). WSF 1 and 2 are an earthen storage with a concrete floor. The storage facility was constructed in 2012 and has a capacity of 4,629,166 gallons. WSF 1 and 2 accept manure and process wastewater generated at the milking site, as well as manure from Site 1 and Site 2 during the winter months. Solid manure is stacked on the concrete ramp leading into the northeast corner of the first cell. There were no permanent markers present and no fencing present at the time of the inspection. The sidewalls of the storage facility appeared to be in good condition with no sign of erosion or degradation. Plans are being drawn to construct additional storage to accommodate a feed storage area with complete collection at the Milking Site.

Photo 19. The floor drain that collects manure and process wastewater from the heifer barn at Site 1. Manure is manually pushed into the basin.

Photo 20. The northeast corner of WSF 1 at the Milking Site, where a concrete ramp slopes down into the storage facility. This photo was taken facing south.

Photo 21. A solid manure pile placed on the concrete ramp that slopes into WSF 1 at the Milking Site. This photo was taken facing west.

Photo 22. The earthen berm that separates WSF 1 and WSF 2 at the Milking Site. Manure flows through a concrete weir to WSF 2.

Photo 23. The earthen berm that separates WSF 1 and WSF 2 at the Milking Site. Manure flows through a concrete weir to WSF 2.

Photo 24. WSF 2 at the Milking Site, located on the southwest corner of the production site at the Milking Site. This photo was taken facing southwest.

Photo 25. WSF 2 at the Milking Site, located on the southwest corner of the production site at the milking site. This photo was taken facing east.

Photo 26. A concrete ramp and agitation pad located on the southwest corner of WSF 2 at the Milking Site.

Photo 27. WSF 1 at the Milking Site, located directly east of WSF 2. This photo was taken facing northeast.

Photo 28. WSF 1 at the Milking Site, located directly east of WSF 2. This photo was taken facing west.

Photo 29. The abandoned SlurryStore located at Site 1.

Photo 30. A concrete reception tank at the Milking Site that accepts manure from the freestall barn and conveys the manure to WSF 1.

Photo 31. The transfer pump that sends manure from the reception tank in Photo 30 to WSF 1.

Process Wastewater (other than feed storage area leachate/runoff)

Process wastewater sources (milking center, wash water, etc.) are managed to not have current or past indicators of discharges.

All process wastewater from the milking parlor is captured and comingled with the manure generated within the barn. The waste is then transferred to permanent storage where it is stored until it can be land applied.

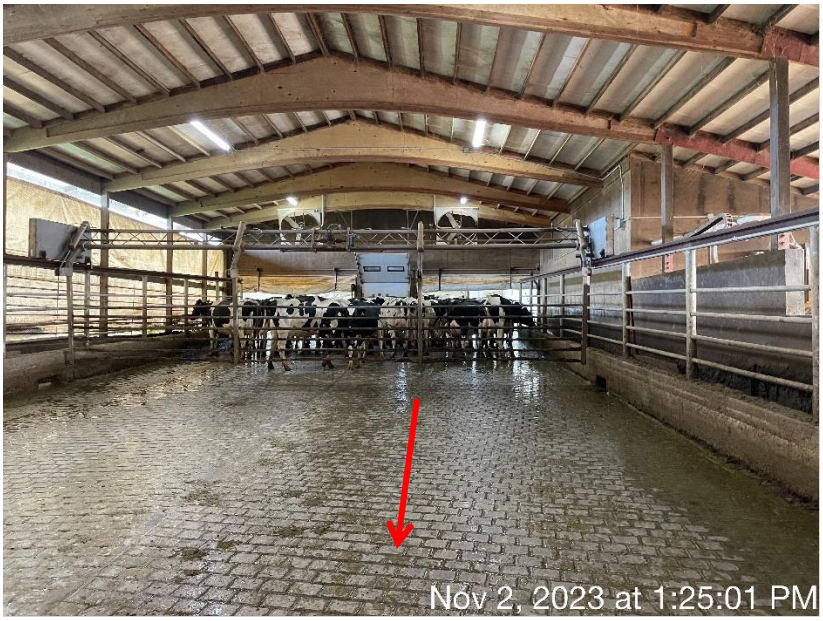


Photo 32. The walkup to the milking parlor at the Milking Site. Wastewater from the milking parlor is comingled with manure and washed down the alley to the manure transfer system.

Feed Storage Area Runoff

Feed storage areas and associated process wastewater (leachate, runoff) are not managed to not have current or past indicators of discharges.

Feed storage areas and runoff control systems are not well-maintained, in good repair and in compliance with permit requirements.

Srnka Farms LLC currently stores 100% of the feed for animals at all sites at Site 1, on an asphalt feed pad where runoff flows to the southeast corner of the pad where it enters an interim runoff collection system. Srnka

Farms LLC currently has an open Category II Notice of Discharge from a discharge from the feed storage area at Site 1 to an unnamed stream (WBIC 5015658) located south of the production site. The interim runoff control system consists of a 55-gallon drum buried on the southeast corner that accepts runoff. A sump pump is placed in the drum to pump runoff to a manure spreader tanker. When the tanker gets filled, Terry Srnka empties the tanker into the storage at the Milking Site or land applied if conditions allow. Srnka Farms LLC was required to construct permanent upgrades by December 31, 2022. Salscheider asked how the interim runoff control system were operating, which Terry replied that it does well but that it does not keep up with the heavier rain falls. Salscheider asked where the runoff flows when the drum overflows. Terry stated that runoff then leaves the southeast corner of the feed storage area and enters the same concentrated flow path that conveys runoff to the stream, where the original discharge occurred. Srnka Farms LLC plans to abandon the feed storage area at Site 1 due to the inability to meet separation to bedrock with the feed pad. Srnka Farms LLC will construct a new feed storage area at the Milking Site. The storage will have a complete collection system, capturing 100% of the runoff in a leachate management pond. Permit schedules will be included in the WPDES permit to reflect the need to abandon the current feed storage area and construct a new feed storage area.

Photo 33. The east side of the feed storage area at Site 1. Runoff was observed flowing on the adjacent driveway.

Photo 34. The flow path of runoff along the east side of the feed storage area at Site 1. This photo was taken facing north.

Photo 35. The interim runoff collection system for the feed storage area at Site 1. A 55-gallon drum and a sump pump transfers process wastewater to a manure tanker.

Photo 36. The manure tanker associated with the interim runoff collection system for the feed storage area at Site 1.

Photo 37. The interim runoff collection system for the feed storage area at Site 1, located on the southeast corner of the feed storage area.

Photo 38. The flow path of runoff that does not get collected from the interim runoff control system, located south of the feed storage area.

Photo 39. The flow path of runoff that does not get collected from the interim runoff control system, located south of the feed storage area.

Photo 40. The south side of the feed storage area at Site 1, where runoff leaves the concrete and flows on the adjacent driveway. This photo was taken facing west.

Photo 41. The south side of the feed storage area at Site 1, where runoff leaves the concrete and flows on the adjacent driveway. This photo was taken facing northwest.

Photo 42. The feed storage area at Site 2, where all the feed for Srnka Farms LLC is stored. This photo was taken facing north.

Photo 43. Corn silage in a feed bag located along the west side of the feed storage area, off the concrete pad. This photo was taken facing south.

Photo 44. An area where a corn silage feed bag was, located on the northwest corner of the feed storage area off the concrete pad. This photo was taken facing north.

Animal Mortality Disposal

Animal mortalities are managed to not have current or past indicators of discharges.

Animal mortalities are stored outside of an animal barn until Sandy Bay Mink Ranch can pick up the mortalities. No discharges from this location was observed during the inspection.

Ancillary Service Areas

Preventative maintenance actions and visual inspections are not occurring to minimize pollutant discharges from ancillary service and storage areas (i.e. storm water conveyance systems, driveways, etc.). Management practices are implemented to sustain sufficient vegetative cover on CAFO outdoor vegetated areas.

Most of the stormwater conveyance systems appeared to be in good condition with no signs of discharges of pollutants. One stormwater culvert located near the southwest corner of the feed storage area at Site 1 had water within and immediately adjacent to the outfall that appeared dark brown in color, similar to liquid manure observed near the concrete feedlot at Site 1.

Srnka Farms LLC utilizes an outdoor vegetated exercise area located on the east side of Site 1. Stormwater is diverted to prevent erosion on the vegetated area and animal walkway leading to the vegetated area. The outdoor vegetated area did not have signs of erosion observed during the inspection.

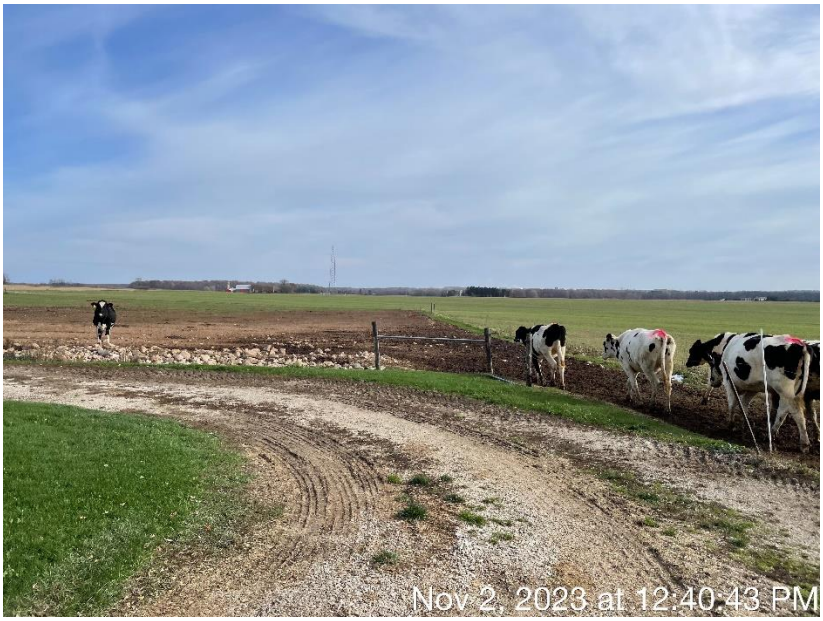


Photo 45. The outdoor exercise area located on the east side of the production site at Site 1. This photo was taken facing east.

Photo 46. The outdoor exercise area located on the east side of the production site at Site 1. This photo was taken facing east.

Photo 47. The outdoor exercise area located on the east side of the production site at Site 1. This photo was taken facing east.

Photo 48. A stormwater culvert located southwest of the feed storage area at Srnka Farms LLC. Brown, opaque water was preset in the culvert. The source of the water was not found.

Photo 49. The flow path of runoff from the culvert located southwest of the feed storage area.

Photo 50. The flow path of runoff from the culvert located southwest of the feed storage area.

Photo 51. The inlet from the culvert located on the north side of the feed storage area. There was no evidence of runoff entering the culvert.

Photo 52. A tile inlet located on the north side of the western barn at Site 1. The inlet accepts stormwater from the roof of the barn.

Photo 53. The driveway between the milking parlor and calf barn at the Milking Site. This photo was taken facing west.

Photo 54. The location where the cattle trailer was washed out, leaving manure-laden water on the gravel driveway on the east side of the production site at the Milking Site.

Photo 55. A stormwater culvert that accepts stormwater from the grassed area between the freestall barn and the existing waste storage facility at the Milking Site.

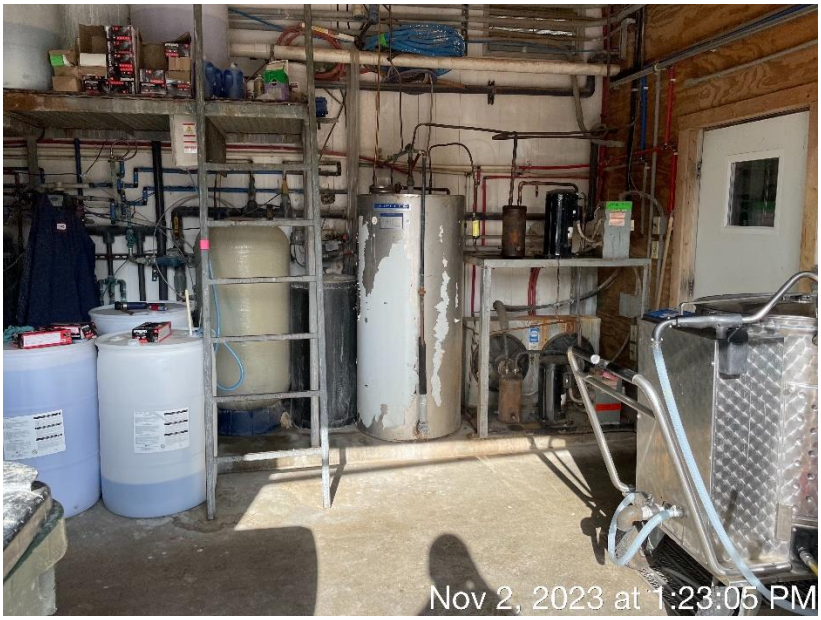


Photo 56. Chemical storage located adjacent to the milking parlor at the Milking Site.

SUMMARY

Substantial Compliance
The permittee is currently not in substantial compliance.

Areas of Concern
Feed storage interim runoff controls
- Evidence of runoff not being captured by the interim runoff controls.

Site 2 barnyard runoff controls
- Lack of runoff controls for the barnyard at Site 2, which is in close proximity to a navigable waterway.

Stormwater conveyance system
- Impacted water within the stormwater culvert on the southwest corner of the feed storage area at Site 2.

Site 1 barnyard runoff controls
- Lack of permanent transfer system to collected and convey runoff to an existing storage.

Permit Violations
N/A

Items for Next Permit Term
- Abandonment of the existing feed storage area at Site 1.
- Construction of a feed storage area and runoff control system at the Milking Site.
- Install permanent markers within existing waste storage facilities.
- Any additional evaluation information/upgrades needed for existing facilities.

Final Permit Application Requirements
Required materials must be submitted together as a complete permit application through the ePermitting System: http://dnr.wi.gov/permits/water/. The system will not allow you to electronically sign and submit your application until all of the following are included:

- 3400-025 form (Livestock/Poultry Operation WPDES Permit Application)
- 3400-025A form (Animal Units Calculation Worksheet)
- 3400-025G form (Evaluated Facilities of Systems Checklist)
- 3400-025C form (Reviewable Facilities of Systems Checklist)
- A soil survey map of the dairy's production area
- A labeled aerial map showing the existing and proposed features and structures of the dairy's production area
- Calculations documenting days liquid manure and process wastewater storage
- Supporting documentation for days storage calculations
- A complete 5-year Nutrient Management Plan (NMP). If necessary, include a description of permanent spray irrigation systems and any other land spreading or treatment systems (proposed or active)
- Plans and specifications for any proposed facilities
- Engineering evaluations for all existing facilities

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster St., PO Box 7921
Madison, WI 53707

Tony Evers, Governor
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

November 15th, 2024

Kewaunee County
Approval

Terry Srnka
Srnka Farms, LLC
E4127 Pheasant Rd
Algoma, WI 54201

SUBJECT: Conditional Approval of Srnka Farms, LLC Nutrient Management Plan, WPDES Permit No. 0067425-01-0

Dear Terry Srnka:

After completing a review of Srnka Farms, LLC 2024-2028 Nutrient Management Plan (NMP) the Wisconsin Department of Natural Resources (Department) is providing conditional approval that it is consistent with Nutrient Management Requirements in s. NR 243, Wis. Adm. Code. This part of your WPDES permit application is now ready for the public notice and comment process as required by Ch. 283 Stats.

Before applying manure onto approved fields each season, the Department recommends Srnka Farms, LLC review the NMP with those individuals involved with manure applications to ensure all remain familiar with the approved manure spreading protocol, spreading maps, field and map verification, record keeping requirements, and all the conditions of this approval. Specifically, some fields in Srnka Farms, LLC may have:

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

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

FINDINGS OF FACT

The Department confirms that:

1. A current dairy herd size of 818 animal units (478 milking & dry cows, 160 heifers, and 90 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 8,789,002 gallons of manure and process wastewater and 287 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 Srnka Farms, LLC currently has 1,382.78 acres (416.1 owned and 966.68 controlled through contracts, rental agreements or leases, or under manure agreements) of which 1,177.8 are spreadable acres.

6. That some fields included in the NMP are directly adjacent to or have high potential to deliver nutrients and sediment to Rio Creek (listed 303(d) impaired water by 'total phosphorus') & Kewaunee Creek (listed 303(d) impaired water by 'total phosphorus' & 'PCB's').
7. That no fields are directly adjacent to or have high potential to deliver nutrients and sediment to outstanding/exceptional waters.
8. That 26 fields are tiled:

- 01	- 02	- 02S	- 04-06
- 07	- 13	- 14/15	- 21
- 22	- TS-01	- TS-02	- TS-03
- TS-04A	- TS-05	- TS-07	- TS-09
- TS-10	- TS-12	- TS-13	- TS-14
- TS-15	- TS-16	- TS-17	- TS-18
- TS-19	- TS-20		

9. That all fields will be checked for the following features prior to/during manure or process wastewater applications: soil areas with possible shallow groundwater (i.e., within 24 inches of surface) at the time of manure application; required setbacks associated with wells, navigable waters, conduits to navigable waters, grassed waterways, wetlands, possible soil erosion/flow channels.
10. That surface applications of manure will not be completed when precipitation capable of producing runoff is forecasted within 24 hours of the time of planned application.

CONDITIONAL NUTRIENT MANAGEMENT PLAN APPROVAL

The Department hereby approves the 2025-2029 Srnka Farms, LLC Nutrient Management Plan subject to the following conditions and the applicable requirements of Ch. NR 243, Wis. Adm. Code:

FIELD AND MANURE MANAGEMENT

1. Fields not included in the NMP and new fields shall not receive manure or process wastewater applications until they have been properly soil sampled, entered into Snap Plus, evaluated for their nutrient needs, and approved by the Department.

2. The following fields have also been approved to receive industrial, municipal, or septage waste:

Field Name	Other Permittee Name	Other Permittee Site Name/ Field Name	DNR #
1	Packerland Whey Products Inc	Br / 2	37067

Prior to any manure applications on these fields Srnka Farms, LLC shall contact the entities listed above to obtain recent spreading records and make the necessary adjustments to the planned manure application rates. At the end of each year Srnka Farms, LLC shall contact each entity listed above to obtain spreading records from the previous year so that they can be properly tracked in the NMP. Please Note: Srnka Farms, LLC is responsible for obtaining nutrient content values for all other wastes spread on any field in their NMP.

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, Srnka 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. Srnka Farms, LLC shall record daily manure applications by using form 'Srnka Manure Log'. These forms shall be retained at the farm and provided to the department upon request.

7. Srnka 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 & CAFO Annual Spreading Reports generated by Snap Plus.

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:
   - 01
   - TS-3
   - TS-5
   - TS-6
   - TS-20
   - TS-21
   - TS-22

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 Srnka 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.
   - 01
   - 02
   - 02S
   - 3
   - 04-06
   - 07
   - 08
   - 09
   - 10
   - 11/12
   - 13
   - 14/15
   - 16
   - 17
   - 18
   - 19
   - 20
   - 21
   - 22
   - 23
   - H-13
   - H-18
   - H-19-20
   - H-21
   - H-22
   - H-23
   - H-24
   - H-25
   - H-26
   - H-27
   - P-S-1
   - TS-01
   - TS-02
   - TS-03
   - TS-04A
   - TS-04B

- TS-05	- TS-06	- TS-09	- TS-10
- TS-22	- V-1	-	-

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.

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: Brittiny Mueller, WDNR Agricultural Runoff Management Specialist (Brittiny.Mueller@Wisconsin.gov)
Joe Baeten, WDNR Watershed Field Supervisor (Joseph.Baeten@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)
Falon French, WDNR Intake Specialist (Falon.French@Wisconsin.gov)
Davina Bonness, Kewaunee County (Davina.Bonness@Kewauneeco.org)
Jake Geiger, Tilth Agronomy Group, Inc (Jake@Tilthag.com)
File

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

Tony Evers, Governor

Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

WISCONSIN DEPT. OF NATURAL RESOURCES

November 4, 2024

FILE REF: R-2024-0124
WPDES Permit #: WI-0063274

Terry Srnka
Srnka Farms LLC
E4127 Pheasant Rd
Algoma, WI 54201

Subject: Days of Storage Review for Srnka Farms LLC T25N, R24E, Section 35 in Lincoln Township, Kewaunee County – NO ADDITIONAL ACTION REQUIRED

Dear Terry Srnka:

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 Patrick Roach, Roach & Associates, LLC on May 1, 2024 with revisions received on October 31, 2024 on behalf of Srnka 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 Srnka Farms LLC has 192 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 818 with 793 animal units contributing to liquid waste. 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 Milking Farm Feed Storage Area, up to the 25-year 24-hour storm, is collected in a detention basin, then transferred to permanent waste storage. An additional feed storage area is located at Site 1 and is recommended to be abandoned according to the evaluation R-2024-0124 submitted on September 9, 2024. The Site 1 Feed Storage area does not have runoff controls. Abandonment plans have not been submitted to the department.

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	2,767,986		106,902		293,591	2,367,493
#2	3,126,345	106,180	114,403	325,596	315,540	2,264,626
					Total MOL Vol:	4,632,119
					Days of Storage:	**192**

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Bedding	3,809,990
Parlor Wastewater	1,219,890
Feed Storage Leachate	31,416
Feed Storage Runoff Collected	2,463,544
Net Precipitation on Storage Surface(s)	1,264,160
TOTAL:	**8,789,000**

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

Email: Terry Srnka; Srnka Farms LLC
(920) 360-6956; TinaSrnka@yahoo.com

Patrick Roach; Roach & Associates, LLC
(920) 833-6340; pat@jmroach.com

Aaron O'Rourke; DNR, Eau Claire
(715) 839-3775; aaron.orourke@wisconsin.gov

Matt Woodrow; DATCP
(920) 427-8505; matthew.woodrow@wisconsin.gov

Brittiny Mueller; DNR-Northeast Region
(608) 228-9184; brittiny.mueller@wisconsin.gov

Joe B Baeten; DNR-Northeast Region
(920) 366-2072; Joseph.Baeten@wisconsin.gov

Davina Bonness; Kewaunee County LCD
(920) 845-9743; bonness.davina@kewauneeco.org

Tabatha A Davis; DNR-Central Office
(608) 712-2324; tabatha.davis@wisconsin.gov

ENVIRONMENTAL ANALYSIS QUESTIONNAIRE
for Concentrated Animal Feeding Operations

The Environmental Analysis Questionnaire (EAQ) for Concentrated Animal Feeding Operations (CAFOs) is part of the Department of Natural Resources' (DNR) programmatic procedures for meeting the requirements of the Wisconsin Environmental Policy Act (WEPA), s. 1.11, Stats and Ch. NR 150, Wis. Adm. Code.

WEPA requires state agencies to analyze, consider and publicly disclose the anticipated environmental and socioeconomic effects of certain agency actions. Under NR 150, this includes the issuance, reissuance, or modification of individual Wisconsin Pollutant Discharge Elimination System (WPDES) permits for new source CAFOs.

A completed EAQ is not a decision document. It is an information tool that is part of the DNR's analysis and disclosure of the environmental and socioeconomic effects of proposed CAFOs and CAFO expansions.

Fill in the information below.

Operation Name:	Srnka Farms, LLC
Contact Name/Title:	Scott Srnka (owner/ operator)
Phone:	(920) 255-4126
Email:	tinasrnka@yahoo.com
EAQ Preparer Name (if different than above):	Courtney Roach
Title/Company:	Roach & Associates, LLC
Phone:	920-833-6340
Email:	courtney@jmroach.com
Date Prepared/Completed:	4/19/20242

Proceed to the "Screening Questions" on the next page.

Screening Questions

Answer the screening questions below for the animal feeding operation for which you are applying for a Wisconsin Pollution Discharge Elimination (WPDES) permit. Your responses will determine whether you need to complete the Environmental Analysis Questionnaire. Use a computer to answer these screening questions. (This section is a fillable form and cannot be completed by hand.) As you answer each question, it will auto-populate the form and direct you to the next step.

Part I. Determine whether the proposed operation is a "New Source CAFO" as defined under section NR 243.03 (41), Wis. Adm. Code.

1. Will the operation be entirely new (i.e., constructed on a site where no other animal feeding operation is currently located)?	No
2. Is the operation a large CAFO (housing 1,000 or more Animal Units) that was constructed on or after April 14, 2003, on a site where no other animal feeding operation was located?	No
3. Is the operation an animal feeding operation housing less than 1,000 Animal Units that was constructed on or after April 14, 2003, on a site where no other animal feeding operation was located – and is now proposing to become a large CAFO?	No
4. Is the operation a large CAFO that was in existence prior to April 14, 2003, but that *completely replaced* (or is proposing to replace) all of its production or processing equipment on or after April 14, 2003?	No
5. Is the operation (as it exists or as it's proposed) *an addition* to an existing large CAFO that was added on or after April 14, 2003? **And if so**, is it *essentially a new production area*, completely independent of the production area that was in existence on the site before April 14, 2003?	No

The operation is not a New Source CAFO as defined in NR 243.03(41). You do not need to fill out anything else. Please save this document, including the information you provided above, and submit along with your permit application.

ENVIRONMENTAL ANALYSIS QUESTIONNAIRE

Directions: Answer each of the following questions. If a question does not apply, explain why. For questions that require narrative responses (e.g., 'explain', 'describe', 'detail', 'discuss'…), your answer should be thorough and clear. Please note that this portion of the EAQ is not a fillable form.

If the proposed operation has, or will have, more than one production area (i.e., multiple locations), provide specific information on each of them, not just the main production area.

Some questions require attachments. These are specially noted. If you need additional space for a written response, include it as an attachment. Be sure to include all attachments with your completed EAQ, along with references to them in the EAQ itself (for example, "See Attachment 3: Soil Disturbance Map").

The symbol ❶ is used to indicate online sources of information requested in the EAQ, as well as additional information that may be of interest to members of the public reviewing your completed EAQ.

DESCRIPTION OF THE PROPOSED OPERATION OR EXPANSION

❶ For the public: *Additional information on the proposed project can be found in the WPDES permit application file. This includes the Permit Application (Form 3400-25) Animal Unit Calculation Worksheet (Form 3400-25A), Plans and Specifications, and Nutrient Management Plan. Search for the permit application file on the DNR Water Permits website:* https://permits.dnr.wi.gov/water/SitePages/Permits.aspx*. You will need a free WAMS ID to access. For more information, and to apply for a WAMS ID visit*: https://dnr.wisconsin.gov/permits/water

1. Provide a detailed overview of the proposed operation, including:

    a. Current Site Characteristics (including land use, buildings, manure storage facilities, runoff control systems, etc.)
    b. Proposed Changes (to above)
    c. Current and Proposed Animal Units
    d. Approximate timeline for construction
    e. Estimated cost
    f. Products (milk, eggs, feeder beef/swine, market ready beef/swine, etc.)
    g. Purpose or Need for the proposed operation or expansion

2. Attach a map showing the location of all current and proposed land application areas. The map should include county, town and municipal boundaries, roads and surface water features. Also include the location of the production area.

❶ Detailed maps of individual fields, showing setbacks or restricted areas for land application of manure or process wastewater, can be found in the Nutrient Management Plan.

3. Will the proposed operation involve applying for additional DNR permits or approvals (not including the CAFO WPDES Permit)? Check all that apply below:

    ☐ DNR Storm Water Construction Site Permit
    ☐ DNR High Capacity Well Permit
    ☐ DNR Non-Transient Non-Community System Testing
    ☐ DNR Chapter 30 Waterway Permit

- ☐ DNR Wetland Disturbance Permit
- ☐ DNR Air Permit
- ☐ DNR Solid or Hazardous Waste License
- ☐ DNR Wastewater Discharge Permit
- ☐ Other: _____
- ☐ Unsure or Undetermined

4. List any non-DNR permits or approvals (local, other state agency, federal, etc.) that will be required for the proposed operation or expansion of an existing operation.

LAND DISTURBANCE

ℹ *Any construction activities that disturb over 1 acre require coverage under the DNR Construction Site Storm Water Runoff General Permit. Information can be found at https://dnr.wi.gov/topic/stormwater.*

5. Estimate the total acreage of soil excavation and disturbance that will occur during the construction of proposed structures (amount of disturbance should also include disturbance that will take place outside the footprint of the proposed structure). Provide following information:

    a. Total Acres: _____
    b. Start Date: _____
    c. Disturbance Length of Time: _____

6. If an erosion control plan has been developed, attach a copy.

7. If a plan has not been developed provide:

    a. A description of the erosion control measures that will be used during soil disturbance to prevent offsite discharges of sediment runoff to wetlands and waterways.

    b. Attach a map showing planned areas of soil disturbance, including stockpile locations.

SOLID & HAZARDOUS WASTES

ℹ *For more information on what is defined as solid or hazardous waste: https://dnr.wisconsin.gov/topic/Waste*

8. Provide an estimate of monthly animal mortalities at the operation (quantity and types or percentage). Describe current or planned disposal methods.

9. List other types of solid waste that will be generated at the operation (e.g., plastic, garbage, etc.). Describe storage, use, disposal, and recycling methods.

10. List types and amounts of hazardous wastes (e.g., veterinary waste, cleaning chemicals, etc.) that will be used and generated at your operation. Describe storage, use, disposal, and recycling methods.

DRINKING WATER AND GROUNDWATER

ℹ *The questions in this section focus on drinking and groundwater associated with the production area. For information on groundwater and bedrock depths at land application sites (spreading fields) see the Nutrient Management Plan in the WPDES permit application file.*

ℹ *For more information on groundwater visit: https://dnr.wisconsin.gov/topic/Groundwater.*

11. Attach a site map showing all current private wells within the production area (including any residential wells on the property, if applicable). Attach a well log record for each well shown on the map.

    ℹ *An online mapping and information tool can be used to show the approximate location of wells and to access well log information. Visit: https://dnr.wi.gov/WellConstructionSearch/#!/PublicSearch/Index.*

12. How many residences and businesses have private wells located within one mile of the production area? Attach a map of the locations of the wells.

13. If any groundwater monitoring has been conducted, attach the latest groundwater monitoring report. Information should include results of parameters analyzed, groundwater depth measurements, general groundwater flow.

14. What is the average groundwater depth at the production area? Attach a site map that shows groundwater depths and groundwater flow direction (if determined). Indicate how this information was derived and attach supporting documentation (soil boring logs, temporary monitoring well measurements, general site assessment data collected, etc.)

15. Are you aware of any known pollutants (nitrates, bacteria, arsenic, etc.) detected in private wells located near the production area and land application sites? Please list pollutants and provide references to any reports.

    ℹ *Regional groundwater quality data can be found on the Groundwater Quality Viewer: https://gissrv3.uwsp.edu/webapps/gwc/pri_wells/*

16. Provide current water use information for the production area:
    a. Current daily water use (in gallons):
    b. Current annual water use (in gallons):

17. Specify if the above numbers are actual (metered) or estimated. If estimated, include information on how the estimates are calculated.

18. List any new wells proposed for the production area and their associated pumping rates (gallons per minute).

19. Provide water use estimates for the production area after new well installation is complete:
    a. Proposed Daily Water Use (in gallons):
    b. Proposed Annual Water Use (in gallons):

SURFACE WATER RESOURCES – WETLANDS & WATERWAYS

ℹ *An online interactive mapping tool, Surface Water Data Viewer (SWDV), is available to assist in answering the questions and for providing maps. Learn about its features and launch it from here: https://dnr.wi.gov/topic/SurfaceWater/swdv/*

Note: Other GIS mapping systems may be used provided they include appropriate map layers.

20. Attach an overview map of the production area that shows all nearby surface water resources (intermittent and perennial streams, mapped wetlands, and hydric soil areas). Label stream names (if an unnamed stream indicate which named stream it flows into, "unnamed tributary to…"). Show on map any areas that may be disturbed for planned construction.

21. Attach a map that identifies with arrows storm water surface drainage flow paths in the production area. If subsurface storm water features (e.g., underground tile, french drains, manholes, etc.) are present and/or proposed, clearly identify those features on the map. Label all outfalls (i.e., points at which storm water leaves production area).

22. Are there any proposed physical changes to land application sites that could impact water resources (i.e., stream channel changes, tile installation, wetland fill or grading, tree clearing, etc.)? If yes, describe the extent of disturbance and attach a map(s) showing proposed areas of disturbance.

AIR QUALITY

ℹ *For more information on air quality see: https://dnr.wi.gov/topic/AirQuality/Toxics.html. (See the "Ag Waste BMPs" tab for extensive information on air quality and livestock operations.) These references may be helpful for estimating emissions: https://www.ars.usda.gov/northeast-area/up-pa/pswmru/docs/dairy-gas-emissions-model/ or https://water.unl.edu/documents/Ammonia%20Emissions%20Estimator%20-%20Daily%20VersionV03.pdf*

23. List any odor mitigation measures that will be implemented for each production area facility.

24. Will odors from gaseous emissions be controlled from manure transport and land application? List any specific mitigation measures.

25. Refer to s. NR 415.04, Wis. Adm. Code (fugitive dust) to help answer the following.

    a. What will the sources of fugitive dust be during construction? What mitigation measures will be taken during construction to minimize fugitive dust?

    b. What will the sources of fugitive dust be at the operation? What mitigation measures will be taken to minimize these impacts. [Note: Fugitive dust is dust arising from a process that does not go through a fan or exhaust port.].

26. Provide a calculated estimate of potential hydrogen sulfide and ammonia emissions from the production area. List specific hydrogen sulfide and ammonia mitigation measures (if any) that will be practiced at the production area.

27. If applicable, discuss odor and emissions from the facility types below. Add any information on facilities specific to your operation.
    a. Anaerobic digester:
    b. Burning or drying systems:
    c. Sand lanes or sand washing systems:
    d. Composting:
    e. Mortality management:
    f. Spray irrigation of manure or process wastewater:
    g. Other:

ENDANGERED RESOURCES

Complete the steps below if the proposed operation or expansion will result in a change in land use (e.g., forested land converted to land application areas, wetland changes, etc.). If no land use change is proposed, no screening is necessary (Answer: "Not applicable"). Note: DNR will supplement the information you provide with specific data from its endangered resource records.

ⓘ Use the NHI Public Portal to generate an Endangered Resources Preliminary Assessment report for the proposed operation or expansion: *https://dnr.wi.gov/topic/ERReview/PublicPortal.html*.

28. Attach a copy of the Endangered Resources (ER) Preliminary Assessment.

29. According to the ER Preliminary Assessment, does the proposed operation or expansion have the potential to impact areas where state or federally listed endangered or threatened species may be present? Please specify.

PUBLIC LANDS

30. Attach a map of any public lands (natural areas, parks, public hunting lands, etc.) located within approximately five miles of the proposed production area.

    ⓘ *Use the public lands mapping tool: https://dnrmaps.wi.gov/H5/?Viewer=Public_Access_Lands*

31. What affects will the proposed operation or expansion have on users of these public properties?

TRAFFIC NOISE & SAFETY

32. Discuss changes in traffic volume and potential impacts of those changes during the following times (include specific information on the number and types of vehicles, frequency, duration, and noise and safety considerations):
    a. During construction (short term traffic)
    b. Post construction (long term traffic), (e.g., manure and process wastewater hauling; field preparation and harvest; livestock, feed, and milk transport; etc.)

33. Describe primary methods of manure and process wastewater hauling (e.g., temporary hose lines, permanent lines, tractor/tanker, semi-trucks, irrigation, etc.). How do each these methods affect traffic noise and safety?

More information on manure and process wastewater land application methods and spill response can be found within the Nutrient Management Plan.

ARCHAELOGICAL / HISTORICAL

Note: The DNR will supplement the information you provide here with data from its historical and archeological records.

34. Are you aware of any state or national historical sites on or adjacent to the proposed operation?

35. How will these sites be impacted? Include short-term (i.e. during construction) and long-term impacts.

36. Are you aware of any archaeological sites (for example, but not limited to, Native American burial sites) that are on or adjacent to the proposed operation?

37. How will these sites be impacted by the proposed project? Include short-term (i.e. during construction) and long-term impacts.

SOCIO-ECONOMIC

38. In the table below, provide the approximate number of homes, businesses and farmsteads within the proximities listed (from the production area).

	Within one mile	Within 5 miles
Residential homes		
Businesses (non-farm)		
Farmsteads		

39. Do you expect the value of nearby properties to increase, decrease, or remain the same in response to the proposed operation? What is the basis for this expectation?

40. Provide employee numbers for the operation in the table below. Provide current employees and an estimate of how many employees after the proposed operation or expansion is complete.

	Full-time Employees	Part-time Employees	Seasonal Employees
Current			
Proposed (after expansion)			

41. Provide information on local services/businesses your operation currently utilizes or will utilize after proposed operation completion. List types (veterinary, agronomic, equipment maintenance, etc.)

42. Describe any additional economic impacts (positive and negative) anticipated as a result of the proposal, and the basis for these expectations. Include specific dollar amounts (if available) entering or leaving the local economy.

PUBLIC CONTROVERSY

43. Describe any past or present public controversy associated with the operation. For example, contentious public meetings, petitions, signage, media coverage, etc.

44. What was or is the stated basis of the controversy or controversies? For example, concerns over particular waterbodies, economic impacts, odor impacts, increased traffic, etc.

45. Do you anticipate any additional public controversy in response to the proposed project?

ALTERNATIVES

Per the questions below, provide a summary of alternatives considered. Be as specific as possible.

46. Describe any alternatives that were considered, but not selected, in planning for the proposed operation or expansion. Describe how each alternative differed from the proposal in terms of the following

    a. Location:

    b. Production Area Size (footprint)):

    c. Animal Numbers (larger, smaller):

    d. Other:

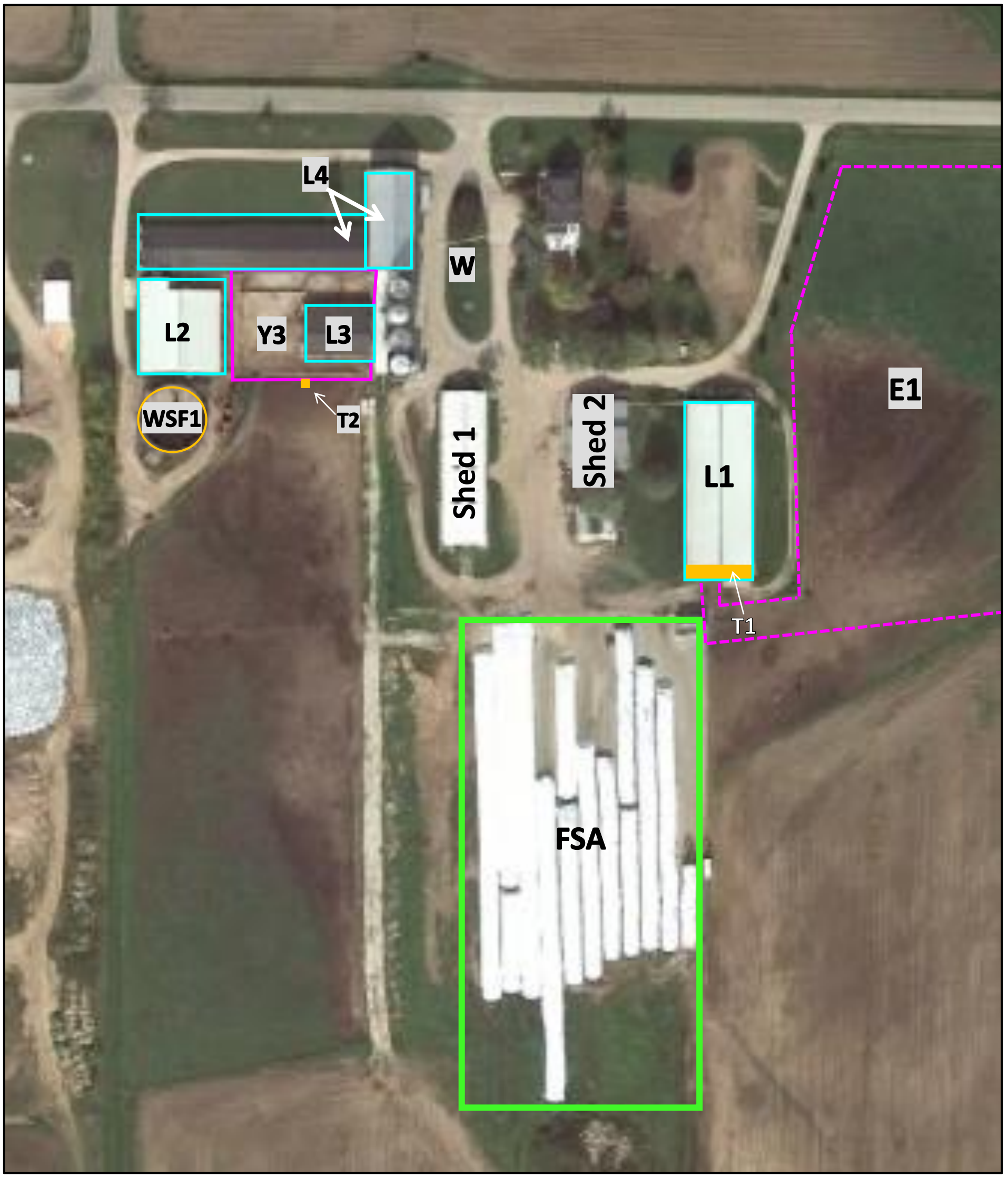
47. Explain why each alternative was not selected for the proposed operation/expansion.

48. If no alternatives were considered, explain why.

ADDITIONAL INFORMATION

49. Describe any other factors or pertinent information that should be considered in evaluating the overall environmental and socioeconomic effects of the proposed operation. Include any new technologies, best-practices, conservation or other measures not described above.

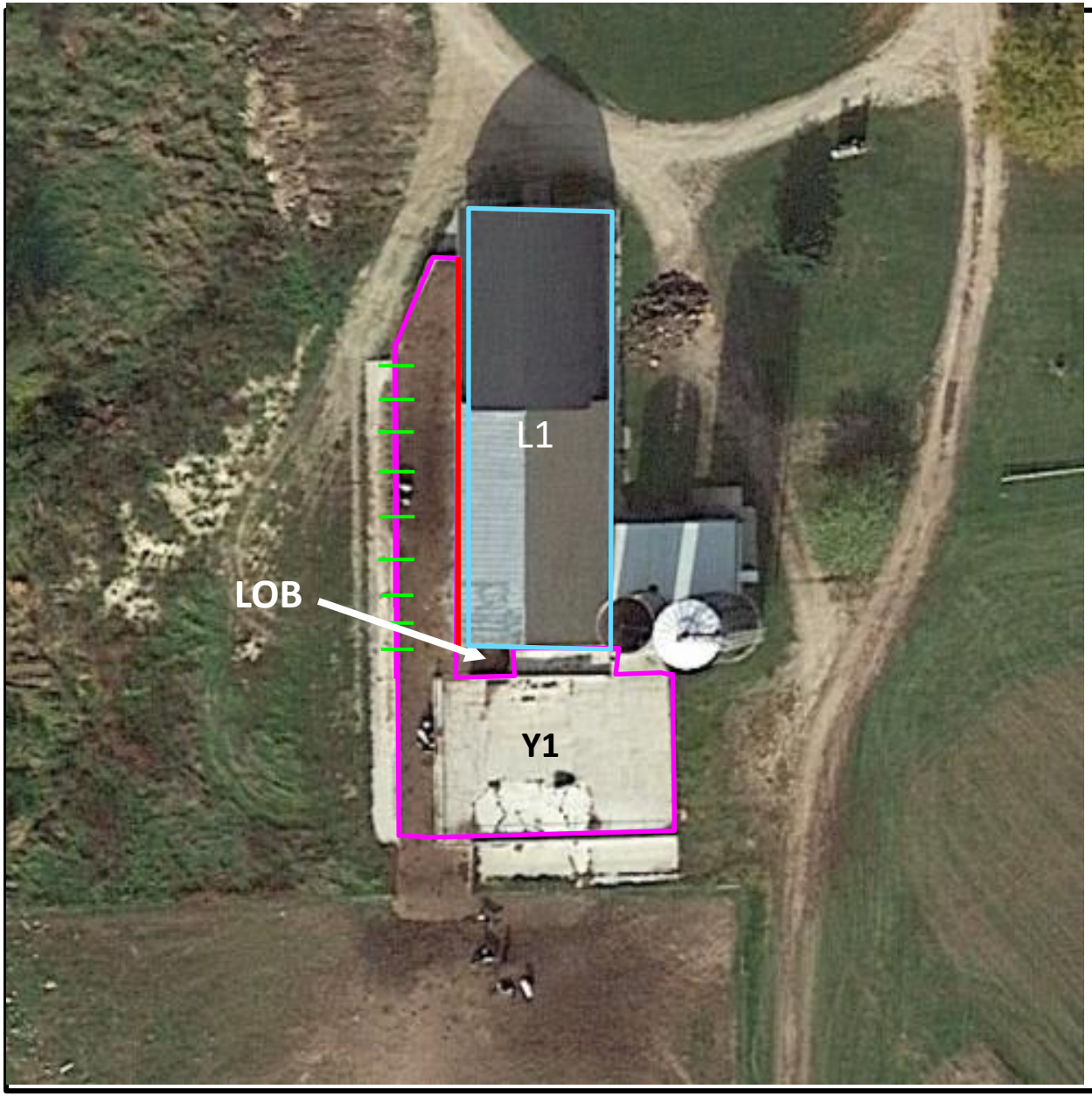
Srnka Farms, LLC ▪ E4127 Pheasant Rd, Algoma, WI 54201
Site 1 ~ HOME FARM



Map Legend

L1-L4	Existing Barns	T	Existing Tank
E	Existing Earthen Lot	WSF	Existing Waste Storage Facility
Y	Existing Concrete Yard	W	Existing Well
FSA	Feed Storage Area		

Srnka Farms Labeled Air Photo_ Terry Site - Site 2



Legend

L1	Barn
Y1	Concrete Yard
	Fenceline Line Feeding
LOB	Load Out Bunker
	Roof Gutters

Srnka Farms, LLC ▪ N7599 Hemlock Road Algoma, WI 54201
Srnka Farms Dairy Site

Legend

L	Existing Barn
WSF	Existing Waste Storage Facility
DB	Proposed Detention Basin
WTP	Proposed Waste Transfer Pipe
FSA	Proposed Feed Storage Area
C	Proposed Commodity Barn
CB	Calf Barn
W	Well