Permit Fact Sheet

General Information

Permit Number	WI-0064017-04-0
Permittee Name and Address	Strutz Farm Inc 13104 Lakeshore Rd, Two Rivers, WI 54241
Permitted Facility Name and Address	Strutz Farm Inc 7500 Irish Road; Two Rivers, WI 54241
Permit Term	August 01, 2026 to July 31, 2031
Discharge Location	7500 Irish Road; Two Rivers, WI 54241; Manitowoc County; T21N, R24E, SE ¼ of Sec 25
Receiving Water	Surface water within the East Twin River Watershed, and groundwaters of the state
Discharge Type	Existing

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.)	44	0	0	0	
Milking and Dry Cows	1981	2023	0	0	
Heifers (400 lbs. to 800 lbs.)	24	40	0	0	
Heifers (800 lbs. to 1200 lbs.)	55	50	0	0	
Total	2104	2023	0	0	

Facility Description

Strutz Farm Inc is an existing Concentrated Animal Feeding Operation (CAFO.) Strutz Farm Inc is owned and operated by the Strutz Family and consists of a single production site. This farm currently has 2,104 animal units (1,415 milking & dry cows, 90 heifers, and 220 calves). The farm does not plan to expand within this permit term. Strutz Farm Inc currently has 3,102 acres (866 owned and 2,236 controlled through contracts, rental agreements or leases, or under manure agreements) of which 3,013 are spreadable acres. Strutz Farm Inc currently has at least 266 days of storage for liquid manure and wastewater.

Substantial Compliance Determination

After a desk top review of all discharge monitoring reports, land application reports, compliance schedule items, and a site visit on 6/13/2025, this facility has been found to be in substantial compliance with their current permit.

Compliance determination made by Trenton Brenny (WDNR CAFO Specialist) on 5/11/2026.

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 Strutz Farm Inc. WSF 1 is an earthen storage and that is located directly east of the sand separation building. The facility has a capacity of 1,718,163 gallons and was constructed in 1995. This storage accepts manure and process wastewater from the existing freestall barns onsite and the milking parlor. WSF 1 is utilized as a solids separation cell, before liquid gravity flows into WSF 2. WSF 1 was last evaluated in 2008 and met permit requirements. Plans have been approved by the Department to expand and re-line WSF 1 during the permit term. Once completed, the concrete lined waste storage facility will have a usable volume of 3,232,501 gallons.	
002	WSF 2: Sample point (002) is for liquid waste storage facility #2 (WSF 2) located at Strutz Farm Inc. WSF 2 is a clay-lined storage located immediately north of WSF 1. The facility has a usable volume of 4,242,632 gallons and was constructed in 1995. This storage accepts manure and process wastewater from WSF 1. WSF 2 was last evaluated in 2008 and met permit requirements.	
003	WSF 3: Sample point (003) is for liquid waste storage facility #3 (WSF 3) located at Strutz Farm Inc. WSF 3 is a clay-lined storage located northwest of WSF 2. The facility has a usable volume of 7,123,476 gallons. It was constructed in 2012 and met permit requirements. This storage accepts manure and process wastewater from WSF 2 and WSF 4.	
004	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.	
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.	
006	Sample point (006) is for visual monitoring and inspection of the feed storage area and associated runoff control system located at Strutz Farm Inc. 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 monitoring program. The vegetative treatment area must be maintained according to the operation and maintenance plan.	
007	Sample point (007) is for visual monitoring and inspection of the concrete feedlot and associated runoff control system located at Strutz Farm Inc. Proper operation and maintenance is required to ensure discharges to waters of the state do not occur. Weekly inspections are required and shall be recorded according to monitoring program.	
008	Sample point (008) is for solid waste storage facility #4 (WSF 4) located at Strutz Farm Inc. WSF 4 is a concrete solids stacking pad located immediately west of WSF 3. The facility has a capacity of 72 tons and was constructed in 2020 with Department approval. The facility accepts waste from the animal barns onsite.	

Sample Point Designation For Animal Waste		
Sample Point Number	**Sample Point Location, Waste Type/Sample Contents and Treatment Description (as applicable)**	
009	Sample point (009) is for and manure solids removed from bottom of liquid waste storage facilities. This includes manure-laden sand solids, manure fiber solids, etc. Representative samples shall be taken from each waste storage facility.	
010	Sample point (010) is for visual monitoring and inspection of all production site storm water conveyance systems. This includes roof gutter and downspout structures, drainage tile systems, grassed waterways and other diversion systems that transport uncontaminated storm water. Proper operation and maintenance is required to keep uncontaminated runoff diverted away from manure and process wastewater handling systems. Weekly inspections are required and shall be recorded according to monitoring program.	

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 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 266 days of storage for liquid manure. The permittee must maintain 180 days of storage, unless temporary reductions in required storage are approved by the Department.

Solid Manure Stacking

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

Ancillary Service and Storage Areas

The permittee shall take preventative maintenance actions and conduct visual inspections to minimize pollutant discharges from areas of the operation that are not part of the production area or land application areas. These areas are called ancillary service and storage areas and include access roads, shipping and receiving areas, maintenance areas, refuse piles and CAFO outdoor vegetated areas.

Nutrient Management

With 2,104 animal units, it is estimated that approximately 20,044,540 gallons of manure and process wastewater and 1,443 tons of solid manure will be produced per year. The permittee owns *approximately* 866 acres of cropland and rents about 2,236 acres. Given the rotation commonly used by the permittee, 3,013 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. 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- Waste Storage Facility 1; 002- Waste Storage Facility 2; 003- Waste Storage Facility 3

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

No changes were made to Sample Point 001, 002, or 003.

1.1.2 Explanation of Operation and Management Requirements

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

1.2 Sample Point Number: 004- Miscellaneous Solid Manure; 005- Headland Stacking Sites; 008- Waste Storage Facility 4; 009- Settled 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

No changes were made to Sample Point 004, 005, 008, or 009.

1.2.2 Explanation of Operation and Management Requirements

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

1.3 Sample Point Number: 006- Feed Storage Area; 007- Outdoor Feedlot, and 010- Storm Water Conveyance Systems

1.3.1 Changes from Previous Permit

No changes were made to Sample Point 006, 007, or 010.

1.3.2 Explanation of Operation and Management Requirements

Sample Points 006, 007, and 010 are required to be inspected in accordance with the operation's monitoring and inspection program. Results shall be submitted to the department annually on January 31.

2 Schedules

2.1 Emergency Response Plan

Required Action	Due Date
Develop Emergency Response Plan: Develop a written Emergency Response Plan within 30 days of permit coverage, available to the Department upon request.	09/01/2026

2.2 Monitoring & Inspection Program

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

Required Action	Due Date
Proposed Monitoring and Inspection Program: Consistent with the Monitoring and Sampling Requirements subsection, the permittee shall submit a proposed monitoring and inspection program within 30 days of the effective date of this permit.	09/01/2026

2.3 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.	01/31/2027
Submit Annual Report #2: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2028
Submit Annual Report #3: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2029
Submit Annual Report #4: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2030
Submit Annual Report #5: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2031
Ongoing Annual Reports: Continue to submit Annual Reports until permit reissuance has been completed.	

2.4 Nutrient Management Plan

Submit annual nutrient management plan (NMP) updates by March 31 of each year. Note, in addition to annual NMP updates, submit NMP amendments and substantial revisions to the department for written approval prior to implementation of any changes to the NMP.

Required Action	Due Date
Management Plan Submittal: Submit any necessary updates to the Nutrient Management Plan to meet the conditions outlined in this permit (see conditions in the Livestock Operational and Sampling Requirements section).	
Submit NMP Update #1: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department for 3400-025D.	03/31/2027
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.	03/31/2028
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.	03/31/2029
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.	03/31/2030
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.	03/31/2031
Ongoing Management Plan Annual Updates: Continue to submit Annual Updates to the Nutrient Management Plan until permit reissuance has been completed.	

2.5 Submit Permit Reissuance Application

Required Action	Due Date
Reissuance Application: Submit a complete permit reissuance application 180 days prior to permit expiration.	01/31/2031

2.6 Explanation of Schedules

Schedule items 2.1, 2.2, 2.3, 2.4, and 2.5 are typical and required for all CAFO permittees.

Attachments

Map(s)

Plan Approval Letter(s)

Prepared By: Trent Brenny

Agricultural Runoff Management Specialist

Date: 5/11/2026


Lakeshore Rd
Solids Stacking Pad
WSF 3
Stormwater Transfer Line
WSF 2
Freestall Barn
Sand
WSF 1
Freestall Barn
Parlor
VTA Bypass Outlet
Shed
Calf Barn
Shed
FSA
VTA
FSA
Storage
Dry Cow Barn
Outdoor Lot
Image © 2023 Airbus
Irish Rd
Irish Rd

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

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
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May 1st, 2026

Manitowoc County
Approval

Russel Strutz
Strutz Farm, Inc
13104 Lakeshore Rd
Two Rivers, WI 54241

SUBJECT: Conditional Approval of Strutz Farm, Inc Nutrient Management Plan, WPDES Permit No. 0064017-04

Dear Russel Strutz:

After completing a review of Strutz Farm, Inc 2026-2030 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 Strutz Farm, Inc review the NMP with those individuals involved with manure applications to ensure all remain familiar with the approved manure spreading protocol, spreading maps, field and map verification, record keeping requirements, and all the conditions of this approval.

FINDINGS OF FACT

The Department confirms that:

1. A current dairy herd size of 2,104 animal units (1,415 milking & dry cows, 90 heifers, and 220 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 20,044,540 gallons of manure and process wastewater and 1,443 tons of solid manure in the first year of the permit term.
3. The use of application restriction options 1, 2 and 5 within surface water quality management areas.
4. The use of phosphorus delivery method P Index.
5. That Strutz Farm, Inc currently has 3,102 acres (866 owned and 2,236 controlled through contracts, rental agreements or leases, or under manure agreements) of which 3,013 are spreadable acres.
6. That all fields will be checked for the following features prior to/during manure or process wastewater applications: soil areas with possible shallow groundwater (i.e., within 24 inches of surface) at the time of manure application; required setbacks associated with wells, navigable waters, conduits to navigable waters, grassed waterways, wetlands, possible soil erosion/flow channels.
7. That surface applications of manure will not be completed when precipitation capable of producing runoff is forecasted within 24 hours of the time of planned application.

CONDITIONAL NUTRIENT MANAGEMENT PLAN APPROVAL

The Department hereby approves the 2026-2030 Strutz Farm, Inc Nutrient Management Plan subject to the following conditions and the applicable requirements of Ch. NR 243, Wis. Adm. Code:

FIELD AND MANURE MANAGEMENT

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

2. The following fields are prohibited from receiving applications of manure or process wastewater:
   - 3s (soil sample density)

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

3. If existing fields yield a soil test results equal to or greater than 200 ppm P, those fields would be prohibited from receiving manure or process wastewater applications, unless you obtain Department approval in accordance with NR 243.14(5)(b)2., Wis. Adm. Code.

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

5. If manure sample results have a dry matter (DM) content less than 2.0% and the percent ammonium (NH_4^+) is greater than 75% of the total N, STRUTZ FARM, INC 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. Strutz Farm, Inc shall record daily manure applications by using form 'Manure Record of Application'. These forms shall be retained at the farm and provided to the department upon request.

7. Strutz Farm, Inc shall annually submit a spreading report that summarizes the land application activities listed under NR 243.19(3)(c)5., Wis. Adm. Code by using 'CAFO Annual Spreading Reports' as generated by Snap Plus.

WINTER SPREADING

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:
   - GM1 - GM4 - 1S-19 - E1

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.

MANURE & PROCESS WASTEWATER IRRIGATION

13. Irrigation of manure or process wastewater is prohibited.

SUBMITAL AND RECORDKEEPING REQUIREMENTS

14. 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.

15. The farm is required to take a minimum number of manures samples to meet permit requirements as follows:
    - Solid Manure: One solid sample per source on a quarterly basis when hauling occurs.
    - Liquid Manure: Two liquid samples per source on a monthly basis when hauling occurs.

16.

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

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

CC:

Trent Brenny, WDNR Agricultural Runoff Management Specialist (trent.brenny@wisconson.gov)
Erin Hanson, WDNR Watershed Field Supervisor (erin.hanson@wisconsin.gov)
Joe Baeten, WDNR Agricultural Runoff Section Manager (joseph.baeten@wisconsin.gov)
Aaron O'Rourke, WDNR Nutrient Management Program Coordinator (aaron.orourke@wisconsin.gov)

Falon French, WDNR Intake Specialist (falon.french@wisconsin.gov)
Tabby Feller, WDNR CAFO Engineer (tabatha.davis@wisconsin.gov)
David Wetenkamp, Manitowoc County (david.wetenkamp@manitowoccounty.wi.gov)
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File

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April 1, 2026

FILE REF: R-2026-0022
WPDES Permit #: WI-0064017

Russel Strutz
Strutz Farm Inc.
13104 Lakeshore Rd
Two Rivers, WI 54241

Subject: Days of Storage Review for Strutz Farm Inc.SE¼ of T21N, R24E, Section 25 in Two Rivers Township, Manitowoc County – NO ADDITIONAL ACTION REQUIRED

Dear Russel Strutz:

This letter is to inform you that the Wisconsin Department of Natural Resources (Department) has completed its review of the calculation of days of storage submitted under certification by Douglas Gatrell P.E., GHD on January 30, 2026 on behalf of Strutz Farm Inc..

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 Strutz Farm Inc. has 266 days of liquid waste storage based on the volumes listed in the table below with respect to s. NR 243.15(3)(i) to (k), Wis. Adm. Code. The current number of animal units provided for the calculation is 2,104. 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 solids stacking pad up to the 25-year, 24-hour storm is collected in permanent storage. Leachate and 0.2 inches of first flush from the feed storage area is collected in permanent storage. The remaining runoff is directed to the farm's vegetated treatment area.

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	3,656,600		117,557		306,542	3,232,501
#2	5,348,561	478,155	180,589		447,185	4,242,632
#3	8,741,826	720,460	252,201	17,554	645,689	7,105,922
					Total MOL Vol:	14,581,055
					Days of Storage:	**266**

Total Annual Liquid Waste Volume (NRCS Table Values)	
Liquids Collected/Stored	Annual Gallons
Manure and Wastewater	16,108,555
Discarded Bedding	402,902
Feed Storage Leachate and Runoff	847,720
Stacking Pad Runoff	192,434
Net Precipitation on Storage Surface(s)	2,492,930
TOTAL:	**20,044,541**

Should you have any questions, please contact Tabby Feller, 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 Feller
CAFO Review Engineer
Watershed Management Program

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