



April 16, 2024

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SUBJECT: Preliminary Intake Review Request for Additional Information, Ridge Breeze Dairy Application for WPDES Permit Modification

The Department has conducted their preliminary intake review of Ridge Breeze Dairy's application for WPDES Permit Reissuance. The plan was received January 22, 2024 and was submitted by Michael Bucher, Auth Consulting & Associates, on behalf of Ridge Breeze Dairy. Below is a list of the Department's comments and requests.

## RESTRICTION MAPS

1. The headland stacking maps do not show the fields listed in the headland stacking approval dated March 7, 2023. There also appear to be additional headland stacking sites with different naming conventions shown on the spreading restriction maps, some of which are not included in this stacking approval. All headland stacking sited must be included as part of the nutrient management plan review. These sites should also be clearly labeled with a unique site name. Please provide updated stacking maps as necessary.

## NARRATIVE & CHECKLISTS

1. The 3400 form needs to be signed by the CAFO owner. Please print the last page of the attached form, cross out the current signature and ask the owner to sign. This page can be scanned or sent as a photo attachment to the Department.
2. The 180-days of storage information does not include the full build-out of all current, proposed and under construction facilities. Please provide the 180-days of storage information with all waste storage structures shown and using the generation volumes of the 9010 AU volume used in the NMP.

## APPLICATIONS AND CROPPING

1. The manure analysis shows that the main pit nutrient values in 2023 are higher than what is used for planning purposes (N = 4.6/6.1/7.6 in manure analysis and 3/4/6 in nutrient mass balance). There are also no other years of manure analyses shown in the averages. Please clarify how manure nutrient content is planned for future applications and provide any updated documentation as necessary.
2. The 590 assessment submitted shows past crop rotations (2017-2024 or 2020-2024) for several fields, as well as short crop rotation (2023-2025) for other fields. The nutrient management plan must show a realistic crop rotation for all fields, one that looks forward through the upcoming permit term. Please ensure that the crop rotations are appropriate. Please note: The crop rotation for some of the fields appears to show 4 or more years of alfalfa crop without a seeding year, or a buffer crop and reseeding year. Please ensure that the crop rotations correctly convey the anticipated plans for each field.

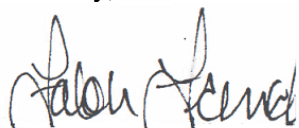
3. The Sorted by Crop reports also show several fields with no planned manure or commercial fertilizer applications planned in one or more future years. This is particularly unexpected for the fields that are planned with corn grain. Please ensure that the nutrient management plan represents the anticipated management strategies for all crop types and submit updated documentation as needed.
4. If Ridge Breeze Dairy has been able to obtain additional soil tests, please feel free to provide an updated soil test report.

**The department requests that you provide the requested updates to the nutrient management plan by April 30, 2024.** This deadline has been established to ensure that a full review of the plan can begin in a timely manner.

Feel free to contact me at (608) 228-5265 or [Falon.French@Wisconsin.gov](mailto:Falon.French@Wisconsin.gov) with any questions related to the Department's review. Please note that information regarding nutrient management planning and Chapter NR 243, Wisconsin Administrative Code, is available on the Department's website at <https://dnr.wisconsin.gov/topic/CAFO/NutrientManagementPlan.html>.

Thank you for your cooperation.

Sincerely,



Falon French  
WDNR CAFO Intake/Nutrient Management Specialist

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