



February 10, 2023

Jeffrey Sauer
CUMBERLAND LLC
N13126 Bruce Mound Ave
Thorp, WI 54771

SUBJECT: Request for Additional Information, Cumberland LLC. Nutrient Management Plan for WPDES Permit Reissuance.

Dear Mr. Sauer:

The Department has conducted their initial review of Cumberland LLC nutrient management plan for WPDES Permit Issuance. The plan was received December 30, 2022 and was submitted by Sam Guyer, Greener Acres Ag, on behalf of Cumberland LLC. Below is a list of the Department's comments and requests.

RESTRICTION MAPS

1. The following fields appear on the spreading restriction maps but are not included in the 590 Assessment:
 - C Johnson
2. The following fields appear on the 590 Assessment but are not included and/or clearly labeled in the spreading restriction maps:
 - Dennis Quimby
 - Herbert East
 - Home 40
 - Home S
 - JPM Chet Elrose
3. The following fields with their associated restriction maps were difficult to view and require resubmission. Careful consideration should be given to zoom and clarity for best viewing. Please update and resubmit.
 - Bill Tietz
 - C Johnson
 - C Johnson Middle
 - Huesset
 - Kaslow Arleth 5
 - Kaslow North of Road
 - Kaslow S of Road
 - Loomis
 - Loomis N
 - Loomis Peterson Rd

NARRATIVE & CHECKLISTS

1. The days of storage documentation submitted as part of the nutrient management plan does not match the days of storage information provided as part of the engineering documentation/plans and specifications. The NMP lists the same animal units (6,163) but shows approximately half the waste storage volume and greater liquid waste production. These calculations should be verified with the engineer established values and reconciled for continuity.
2. The narrative indicates that 6,789,137 gallons of manure and 2,007,500 gallons of wastewater will be generated annually. The manure tracking report and nutrient mass balance list two sources that appear to be manure sources. In total these two sources of manure equal 8,796,637 gallons per year. The wastewater source and sludge source included do not have any planned production. Please confirm what sources are

to be generated and required to be applied, and make sure it is consistently demonstrated within the NMP to show full allocation of the manure over the permit term.

3. It is required in NR 243 that a farm request 2 or more fields for emergency winter spreading approval. The current narrative does not specify what fields the farm is requesting for emergency approval. Please revise and resend

APPLICATIONS AND CROPPING

1. The days of storage documentation submitted as part of the NMP includes gallons of liquid manure/process wastewater applied in 2019 and 2020. Please provide documentation of these applications – what was applied, where it was applied, and any relevant land agreements and/or Department approvals.
2. The nutrient mass balance lists incinerator ash as a source of nutrients. Please provide the documentation you used to determine the nutrient content in this ash, and any plans to verify the nutrient content in the future.
3. The SnapPlus reports should be submitted for the full permit term and must include the crop rotations and planned manure applications through 2028. Please rerun all SnapPlus reports for the full crop rotation.
4. The tile maps indicate that there are known tiles for three fields, but are not flagged as tiled in the narrative or SnapPlus reports: Gary Bohn, Spook N, and Spook S. Please update these documents.
5. The department is requesting signed land agreements for all fields that are not owned by Cumberland LLC. These should be complete and include identifying naming for farm or fields to be able to be cross referenced within the NMP.

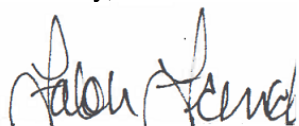
The department requests that you provide the updated documentation to the nutrient management plan by **February 22, 2023**: NMP Narrative, 590 Assessment, Compliance Check, Sorted by Crop Reports, and Nutrient Mass Balance Report. This deadline has been established in order to keep the review process moving in a timely matter.

All signed land agreements are required to be submitted back to the department no later than **March 10th, 2023**.

Feel free to contact me at (608) 228-5265 or 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 <http://dnr.wi.gov/topic/AgBusiness/CAFO/NutrientManagementPlan.html>.

Thank you for your cooperation.

Sincerely,



Falon French
WDNR CAFO Intake/Nutrient Management Specialist

cc: Tyler Dix, WDNR CAFO Permit Coordinator (Tyler.Dix@wisconsin.gov)
Christopher Clayton, WDNR Runoff Management Section Chief (ChristopherR.Clayton@wisconsin.gov)
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