

**CWA COMPLIANCE EVALUATION INSPECTION REPORT  
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

**Purpose:**

Compliance Evaluation Inspection

**Facility:**

Sandway Farms LLC  
E1411 Bolt Road  
Denmark, Wisconsin 54208

**Mailing Address:**

Same as above.

**NPDES Permit Number:** WI0066346

**Date of Inspection:** March 19, 2025

**EPA Representatives:**

Cheryl Burdett, Inspector 312-886-1463

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**State Representatives:**

Brittany Mueller, 608-228-9184 WDNR Runoff Agricultural Specialist

[brittany.mueller@wisconsin.gov](mailto:brittany.mueller@wisconsin.gov)

**Facility Representatives:**

Wayne Bradley, Owner 920-362-3941

[sandwayfarms@gmail.com](mailto:sandwayfarms@gmail.com)

CHERYL

**Inspector Signature:** BURDETT

Digitally signed by  
CHERYL BURDETT  
Date: 2025.05.15  
08:08:03 -05'00'

**Approver Name and Title:** Ryan J. Bahr, Supervisor, Section 2, Water Enforcement and  
Compliance Assurance Branch

**Approver Signature and Date:**

Bahr, Ryan

Digitally signed by Bahr,  
Ryan  
Date: 2025.05.15  
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## **1. BACKGROUND**

EPA conducted an unannounced compliance evaluation inspection on March 19, 2025 to determine compliance with the Clean Water Act and parts of their Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0066346 at Sandway Farms, LLC (Sandway) located at E1411 Bolt Road, Denmark, Wisconsin 54208. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollutant Control Act, as amended.

Sandway is a large dairy that confines 740 milking and dry cows. The definition of a large dairy concentrated animal feeding operation is it stables or confines as many as or more than 700 mature dairy cows, whether milking or dry.

Runoff from Sandway flows south and southwest into Jambo Creek into the East Twin River and then into Lake Michigan, a traditional navigable waterway. Jambo Creek is on the 303d list for impaired waters for nitrogen and phosphorus.

## **1. SITE INSPECTION**

**Table 1: Site Entry and Opening Conference**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| <b>Arrival Time:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 9:00 AM                                          |
| <b>Temperature:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 37 degrees Fahrenheit overcast and windy         |
| <b>Precipitation:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Yes. There was light rain during the inspection. |
| <b>Presented credentials?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Yes, to the Owner at 9:08 AM                     |
| <b>Credentials presented to whom and at what time?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The Owner.                                       |
| <b>Was an opening conference held? Yes. With whom?</b> Wayne Bradley<br><br>EPA arrived at approximately 9:00 AM and disinfected the tires on the government car before entering Sandway located at E1411 Bolt Road, Denmark, Wisconsin 54208. After spraying the tires, EPA drove the vehicle on-site and donned our yellow boots and then introduced themselves to the Owner. EPA presented their credentials and explained that the inspection would include conducting a walk-through of the facility, reviewing documents and asking questions from EPA's checklist. The Owner confirmed that EPA's car was in good location. EPA asked the Owner if there was a location to go through the checklist. The Owner lead EPA and WDNR inside to the machine barn to go through their Concentrated Animal Feeding Operation (CAFO) Inspection checklist. I explained that during the inspection if the Owner had any areas or information he considered Confidential Business Information (CBI), to let us know. The Owner did not make a request during the inspection to claim any of the information as CBI.<br><br>I said that the inspection may take approximately three to four hours. I discussed our biosecurity procedures with the Owner, explaining that we would not be going through any of the barns that house animals and that we have not been at any animal feeding operation in the last week. |                                                  |

|                                                                                                                              |                                                         |      |
|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|------|
| <b>If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?</b> |                                                         | None |
| <b>Which information does the facility consider to be CBI?</b>                                                               | Not applicable.                                         |      |
| <b>EPA vehicle parked in approved location.</b>                                                                              | Yes, confirmed with the Owner.                          |      |
| <b>Location where EPA vehicle was parked?</b>                                                                                | Government cars are parked in front of the office/shop. |      |
| <b>Disposable boots worn?</b>                                                                                                | Yes.                                                    |      |
| <b>Were bio-security measures taken?</b>                                                                                     | Yes.                                                    |      |

**2.1 Records Review** (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

**Table 2: Documents**

|                                                                                |
|--------------------------------------------------------------------------------|
| <b>Checklist(s) Used</b>                                                       |
| R5 CAFO Inspection Checklist                                                   |
| <b>Facility Documents Reviewed:</b>                                            |
| Daily and weekly inspections of waterlines and Waste Storage Facilities (WSF). |

**Table 3: Facility Description**

| Type of Animal                                                                                                      | Number of Animals | Capacity | Type of Confinement                                                                  |
|---------------------------------------------------------------------------------------------------------------------|-------------------|----------|--------------------------------------------------------------------------------------|
| Milking and Dry                                                                                                     | 740               | 740      | Freestall Barns                                                                      |
| Heifers                                                                                                             | 50                | 50       | Barn                                                                                 |
| Calves (0 -9 months)                                                                                                | 200               | 200      | calf hutches and superhutches.                                                       |
| <b>Minimum Number of Animals in previous 5 years:</b>                                                               |                   |          | 740 milking and dry cows.                                                            |
| <b>Maximum Number of Animals in previous 5 years:</b>                                                               |                   |          | 740 milking and dry cows.                                                            |
| <b>Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:</b> |                   |          | 740 milking and dry confined.                                                        |
| <b>Amount of Liquid Manure Generated per year:</b>                                                                  |                   |          | The Owner had stated that they generate 8 million gallons of liquid manure annually. |
| <b>Amount of Solid Manure Generated per year:</b>                                                                   |                   |          | The Owner had stated that they generate approximately 200 tons annually.             |
| <b>Does the facility have an NPDES Permit?</b>                                                                      |                   |          | Yes.                                                                                 |
| <b>SIC or NAICS code:</b>                                                                                           |                   |          | 0241.                                                                                |
| <b>CAFO Designation/Defined Date (If a designated CAFO)</b>                                                         |                   |          | Sandway is defined as a large CAFO by the number of milking and dry cows.            |
| <b>Do animals have direct access to WOUS?</b>                                                                       |                   |          | No.                                                                                  |
| <b>Are crops, vegetation, forage growth, or post-harvest residues sustained in the normal growing</b>               |                   |          | No.                                                                                  |

|                                                                               |                                                                                                     |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| <b>season over any portion of the lot or facility where animals are kept?</b> |                                                                                                     |
| <b>What is the area (acres) of the production area?</b>                       | Approximately 10 Acres.                                                                             |
| <b>What is the area (acres) of the pasture?</b>                               | According to the Owner, during the summer, cows are put out on pasture approximately 40 – 50 acres. |
| <b>How many employees (not counting family members)?</b>                      | I did not ask the number of employees.                                                              |
| <b>Other facilities under common ownership (name and address):</b>            |                                                                                                     |
| No other facility.                                                            |                                                                                                     |

**Table 4: Livestock Waste Storage**

| <b>Type of Storage</b>                                | <b>Storage Capacity</b>                                                     | <b>Type of Liner</b> | <b>Date of Construction</b>                                   | <b>Depth Markers Present</b> | <b>Last Time Waste was Removed</b> | <b>Amount of Waste Removed</b> | <b>Days of Storage</b>                      |
|-------------------------------------------------------|-----------------------------------------------------------------------------|----------------------|---------------------------------------------------------------|------------------------------|------------------------------------|--------------------------------|---------------------------------------------|
| Waste Storage Facility (WSF) 01                       | Total storage is 588,453 gallons (according to WDNR's e-permitting site).   | Concrete             | 1990s                                                         | No.                          | November/December 2024             | 585,000 gallons                | Have approximately 15-16 months of storage. |
| Waste Storage Facility (WSF) 02                       | Total storage 10,889,940 million gallons (off of WDNR's e-permitting site). | Concrete             | I did not get information on the construction date of WSF 02. | Yes                          | November/December                  |                                |                                             |
| Waste Storage Facility (WSF) 03<br>Solid Stacking Pad | The Owner was not sure and size not on WDNR's e-permitting site.            | Concrete Pad         | 2015                                                          | No.                          | January 30, 2025                   | Not sure.                      | Not sure.                                   |

**TABLE 5: Record Information on Waste Storage**

|                                                                                                                                |                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>Records at site of storage structure design?</b>                                                                            | According to the Owner, the storage design records are not on-site but may be able to be obtained from NRCS – Eric Schram. |
| <b>Is manure stored for the short term?<br/>If yes, describe where it is stored, how it is drained and where it drains to.</b> | There is a solid manure stacking pad on the north side of WSF 01.                                                          |
| <b>Are records kept of the level of manure in the storage structures?</b>                                                      | Yes. The Owner provided these documents for EPA's review at the time of the inspection.                                    |

|                                                                                                                                                                                         |                                                                                                             |
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| <b>When was the last time a storage structure was emptied, either partially or completely?</b>                                                                                          | The Owner stated that WSF 01 was emptied in November and December of 2024 and WSF 02 was partially emptied. |
| <b>What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?</b>                                         | According to the Owner, they had removed approximately 585,000 gallons of manure from WSF 01 and WSF 02.    |
| <b>Do the facility personnel inspect and keep records of all diversion devices?</b>                                                                                                     | Yes, for January 1, 2025 through March 18, 2025.                                                            |
| <b>Do the facility personnel inspect and keep records of all impoundments?</b>                                                                                                          | Yes, for January 1, 2025 through March 18, 2025.                                                            |
| <b>Do the facility personnel inspect and keep records of all the water lines?</b>                                                                                                       | Yes, for January 1, 2025 through March 18, 2025.                                                            |
| <b>Do the facility personnel perform routine visual inspections and keep records of the production area?</b>                                                                            | Yes for January 1, 2025 through March 18, 2025.                                                             |
| <b>Does the waste storage system have a managed outfall or discharge point?<br/>If yes, provide a description of the outfall and a description of the area receiving the discharge.</b> | No. The Owner stated that there is no managed outfall within WSF 01 and WSF 02.                             |
| <b>Has the facility had any documented discharges of livestock waste to surface water in the past year?</b>                                                                             | According to the Owner, there has not been any documented discharges to surface water in the past year.     |
| <b>Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)</b>                             | Yes. There is a fence around the WSF 01 and WSF 02.                                                         |

**Table 6: Livestock Waste Management**

|                                                                                                                                                                                                                                                                    |                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| <b>Describe the way manure is collected and disposed of at the facility:</b>                                                                                                                                                                                       |                                                                                                                          |
| The manure from Freestall Barn 1 is cleaned out using a skid loader and rubber tire which is used to push used bedding, manure, and process wastewater into a trench that uses gravity and an auger to convey manure, used sand, and process wastewater to WSF 01. |                                                                                                                          |
| The manure and used bedding in Freestall Barn 2 are cleaned using a chain to push manure, used sand, and process wastewater into the reception pit and then pumped to WSF 01.                                                                                      |                                                                                                                          |
| The calf barn is scaped and spread directly to the field if the fields can receive manure. If not, the manure is stored on the solid stacking pad.                                                                                                                 |                                                                                                                          |
| The liquid manure from WSF 1 flows by gravity into WSF 2.                                                                                                                                                                                                          |                                                                                                                          |
| <b>Describe the way used bedding is collected and disposed of at the facility:</b>                                                                                                                                                                                 |                                                                                                                          |
| Used sand is collected the same as the manure in the Freestall Barns 1 and 2 into either WSF 01 or WSF 02.                                                                                                                                                         |                                                                                                                          |
| <b>Are mortality records kept?</b>                                                                                                                                                                                                                                 | The Mortality Records are not kept on-site. According to the Owner, the records are kept with "Dairy Heard Improvement." |
| <b>Describe the way mortalities are managed at the facility:</b>                                                                                                                                                                                                   |                                                                                                                          |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                      |
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| Sandy Bay Mink Farm picks up the mortalities when they are called.                                                                                                                                                                                                                                                                                                                                                                                            |                                      |
| <b>What type of method is used to provide drinking water for the animals?</b><br><br><b>(Drinkers with float system? Nipple waters? If nipple waters, is backflow prevention installed?)</b>                                                                                                                                                                                                                                                                  | Water fountains with a float system. |
| <b>Describe the way spilled drinking water is collected and disposed of at the facility:</b><br>The water is collected with the manure in the Freestall Barns 1 and 2, maternity barn, and calf barns.                                                                                                                                                                                                                                                        |                                      |
| <b>Describe the way mist cooling water is collected and disposed of at the facility:</b><br>Misting is used in the Freestall Barns but not for the calves.                                                                                                                                                                                                                                                                                                    |                                      |
| <b>Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:</b><br>Chemicals and teat dip are stored in the milking parlor. There is a drain in the room. The Owner stated that they currently had 200 gallons of concentrated teat dip which is diluted when used.                                                                                                                                 |                                      |
| <b>Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:</b><br>Manually scraped in Freestall Barns using skid loader and tire.                                                                                                                                                                                                                                                                         |                                      |
| <b>Describe where water comes from that is used to clean and/or flush. (Wells, city, etc.)</b><br>Well water is used to clean the milking parlor. Holding area is cleaned by scraping and washing with plate cooler water.                                                                                                                                                                                                                                    |                                      |
| <b>Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:</b><br>Feed is stored on the feed storage pad and in bunkers. The leachate and process wastewater from the feed storage pad and bunkers is collected at the southwest corner of the feed storage pad and bunkers in different pipes that convey flow through underground pipes by gravity to either WSF 01, the VTA, or into a stormwater ditch. |                                      |
| <b>If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:</b><br>Plate cooler water is given to the cows and used to clean the milking parlor and holding area.                                                                                                                                                                                                                                |                                      |
| <b>If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:</b><br>Wastewater from the cleaning of the milking parlor is collected in WSF 01.                                                                                                                                                                                                                                        |                                      |
| <b>If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:</b>                                                                                                                                                                                                                                                                                                                                        |                                      |

|                                                                           |              |
|---------------------------------------------------------------------------|--------------|
| Wastewater from the cleaning of the milking tanks is collected in WSF 01. |              |
| <b>If a dairy, how many times per day are cows milked?</b>                | Three times. |

**Table 7: Land Application and Disposal of Manure and Process Wastewater**

|                                                                                           |                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Does the facility perform and keep records of the manure testing?</b>                  | Yes.                                                                                                                                                                                                                                                                                                              |
| <b>When was the last time a sample was taken of the manure and/or process wastewater?</b> | Liquid manure was last sampled in December of 2024.                                                                                                                                                                                                                                                               |
| <b>Describe the process to take the manure and/or process wastewater sample.</b>          | Several samples are collected at the time the manure is being pumped into the trucks for land application. Grab samples are collected from the solid manure stored on the solid manure stacking pad before it is land applied. However, solid manure that is applied directly to the fields is not being sampled. |
| <b>Number of acres available for land application:</b>                                    | 2000 acres which includes verbal and leased and rented.                                                                                                                                                                                                                                                           |
| <b>Are land application records kept?</b>                                                 | Kevin Becker, Consultant keeps the land application records.                                                                                                                                                                                                                                                      |
| <b>Who applies the manure and process wastewater to the fields?</b>                       | Sandway land applies the solid manure. Right Way Application, LLC land applied the liquid manure.                                                                                                                                                                                                                 |
| <b>Are weather conditions at time of application kept? (24 before – 24 after)</b>         | According to the Owner, he was not sure but said that he could check with Kevin Becker, the Consultant or Jeff Kohnle, Agronomist.                                                                                                                                                                                |
| <b>Does the facility perform and keep records of the soil testing?</b>                    | The Owner stated that I have to ask Kevin Becker or Jeff Kohnle.                                                                                                                                                                                                                                                  |
| <b>Is manure transferred off-site to another party?</b>                                   | No.                                                                                                                                                                                                                                                                                                               |
| <b>Are manure transfer records maintained?</b>                                            | Not applicable.                                                                                                                                                                                                                                                                                                   |
| <b>Do facility personnel perform periodic inspection of land application equipment?</b>   | Land application equipment is calibration by Right Way Applications, LLC.                                                                                                                                                                                                                                         |

**Table 8: Receiving Surface Waters**

|                                            |
|--------------------------------------------|
| <b>Describe the surface flow pathways:</b> |
|--------------------------------------------|

|                                                                                                                                                                                   |                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| According to the national hydrography dataset, the nearest stream is Jambo Creek. Jambo Creek is a perennial creek that flows to the East Twin River and then into Lake Michigan. |                                                                                     |
| <b>How many months out of the year is there flow in the nearest surface water pathway:</b>                                                                                        | According to the national hydrography dataset, Jambo Creek is a perennial waterway. |
| <b>Are there any storm water pathways entering the facility?</b>                                                                                                                  | No pathways entering the Facility.                                                  |
| <b>Are there any clean water ponds on site?</b>                                                                                                                                   | No clean water ponds onsite.                                                        |
| <b>What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?</b>                                       | East Twin River to Lake Michigan.                                                   |
| <b>Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent, or perennial?</b>                                                               | Intermittent.                                                                       |
| <b>Has the surface water pathway nearest to the facility been assessed for water quality?</b>                                                                                     | I am not sure if pathway nearest to the facility has been assessed.                 |

**Table 9: Nutrient Management Plan**

|                              |                                                                                                                                   |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| <b>NMP on site?</b>          | Not readily available on-site, but I explained that I was issuing an Information Request that would be sent after the inspection. |
| <b>Date NMP Submitted:</b>   | March 31 – Updated by Kevin Becker or Jeff Kohnle.                                                                                |
| <b>Planner Name/Company:</b> | Kevin Becker or Jeff Kohnle.                                                                                                      |

**Table 10: NPDES Permit**

|                                                                                                                                     |                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>Type of permit (General, individual)</b>                                                                                         | Individual                                                                                                |
| <b>Is a copy of the permit on site?</b>                                                                                             | During the inspection, it was not documented whether Sandway had the WPDES Permit on-site.                |
| <b>Date that the permit was issued:</b>                                                                                             | April 11, 2023                                                                                            |
| <b>Date that the permit will expire:</b>                                                                                            | March 31, 2028                                                                                            |
| <b>Permitted number of animal units:</b>                                                                                            | Permit does not include this information.                                                                 |
| <b>Does the permit contain a compliance schedule? If yes, provide a detailed description of the requirements and the status.</b>    | No.                                                                                                       |
| <b>Have there been any changes made to the production area since the permit was issued? If yes, provide a detailed description.</b> | I did not have the most updated NMP prior to the inspection to determine if the Facility had any changes. |

## **2.2 Walkthrough of the Facility**

EPA, WDNR, and the Owner (we) started the walk-through at the Office/Shop. We walked south then to the east between Freestall Barns 1 and 2 (Photo 2). We walked south to observe the south stormwater drain. EPA also looked inside the south stormwater drain between the Freestall Barn 1 and 2 (Photos 3, 4, 5.). We then walked back to the north between Freestall Barns 1 and 2 and EPA looked inside the north stormwater drain (Photo 6). EPA observed liquid flowing from under the garage door toward the north stormwater drain. The Owner had stated that this was plate cooler water (Photo 7). EPA looked to the west and observed that clean sand bedding is stored on the north side of the Freestall Barn 2. It was lightly raining at the time of the inspection and EPA observed runoff from the clean sand pile (red outlined box) to the east toward the north stormwater drain (Photo 8). EPA observed that calf hutches with calves inside them were between Freestall Barns 1 and 2 where runoff from the calf hutches could flow into the north stormwater drain (Photo 9).

We continued to walk from between Freestall Barns 1 and 2 to the west and then to the south and observed the maternity barn (Photos 10 and 11). We continued to walk south between the calf barn and the commodity barn (Photo 12). EPA observed the drain between the commodity barn and the calf barn and which had bedding material within the drain (Photo 13). EPA looked to the east to observe between the barns and observed feed had spilled under the feed silos (Photo 14). We continued to walk to the south and observed the hay barn storage (Photo 15) and the feed storage pad and bunkers (Photo 17). We walked along the west side of the feed storage pad and bunkers and observed the open face of silage within the bunker (Photo 18). EPA observed that the feed storage pad and bunkers are sloped to the southwest to collect leachate and process wastewater within a catch basin that the facility described has two levels of collection for silage leachate and process wastewater and a third level for stormwater that will flow into the stormwater ditch (Photos 19 through 22). The green PVC pipes and black pipes are designed by height and circumference. The silage leachate collection is lowest to the ground and has the smallest circumference. This pipe collects the highest nutrient content of leachate and process wastewater which will be conveyed through underground piping to the reception pit and pumped to WSF 02 (Photo 19, 23, and 24). The middle green PVC pipe is higher off the ground and slightly bigger in circumference to collect process wastewater during a precipitation event and gravity flows into the concrete spreader bar that distributes flow into the Vegetated Treatment Area (VTA) (Photos 19, 25, and 26). The black pipe which is the highest off the ground and has the largest circumference area and is intended to collect water that has the lowest nutrient value and discharge to the stormwater ditch. It was not clear during the inspection if the feed storage pad and bunker and catch basin were designed for the 25-year 24-hour storm (Photo 19). We walked to the southeast toward the VTA and observed the condition of the VTA (Photos 27).

EPA observed a gravel channel (Photo 29) along the east side of the silage bunker wall that the Owner explained was a perforated tile that collects any leachate on the east side of the silage bunkers and conveys it to the reception pit which then pumps the process wastewater into WSF 02 (Photos 23 and 24).

We walked to the southeast and observed the pastures which at the time of inspection did not have cows on it (Photos 30 and 31). EPA walked to the south side of Freestall Barn 1 to observe the calf hutch area. The calf hutch area is sloped to the east to collect process wastewater in a catch basin and convey flow through underground piping by gravity into WSF 02 (Photos 33, 35, 37). We walked to the calf barn north of the catch hutch area (Photo 38 through 40). We continued to walk to the east to the southside of WSF 01 (Photo 41 and Photo 42). There was no

staff gage within WSF 01. We walked to the southwest corner of WSF 02 and observed the pipe going into WSF 02 from the calf hutch area. We continued to walk to the east to south side of the heifer facility and observed the additional feed storage area at the heifer facility. The Owner explained that there is a process wastewater drain along the south side of the additional feed storage pad (Photo 48) that collects leachate and process wastewater and conveys flow through underground piping by gravity to WSF 02. The Owner stated that he can close the drain if no feed is stored on the pad or can partially close the drain either on the east or west side of the pad if feed is only stored on one side of the pad. At the time of the inspection, the Owner had stated that the additional feed storage pad drain was closed on the east side of the pad (Photo 47), since no feed was stored on the east side of the pad.

EPA walked to north to observe the heifer barn and observed that heifers and the feed fed to the heifers is under roof (Photo 49).

EPA walked to west to observe WSF 02 and WSF 01. EPA observed the depth markers within WSF 02 and that WSF 02 had been partially emptied (Photo 50). We walked to the solid manure stacking pad (Photo 52) and EPA observed that the block wall was pushed out and solids were on the ground outside of the solid manure stacking pad (Photo 53). The Owner stated that they were the process of putting in a solid concrete wall.

EPA walked between Freestall Barn 1 and WSF 01 and observed manure that had overflowed into the grassed stormwater drainage area between the WSF 01 and Freestall Barn 1 (Photos 57 through 60). The Owner thought that this may have been caused by the manure freezing and blocking the gravity flow of manure from Freestall Barn 1 into WSF 01.

We walked along the north side of Freestall Barn 1 and observed clean sand stored on the north side of Freestall Barn 1. EPA observed sand on the berm of the roadside ditch which had come from the north side of Freestall Barn 1 (Photo 65). EPA did not observe containment for the runoff from the clean sand to prevent runoff into the roadside ditch during a precipitation event.

We observed the stormwater area along the north side of Freestall Barn 1 (Photo 66 ). We walked back to the south side of the calf hutch area to observe the stormwater drain which was discharging at the time of inspection. EPA was trying to observe whether we could see the pipe coming from the feed storage pad and bunkers and whether it was discharging but could not see any pipes coming into the stormwater pipe on the south side of the calf hutch area (Photos 67 through 69).

### **2.3 Closing Conference and Post-Inspection**

EPA completed the walk-through of the Feed Storage Area and explained to the Owner that we had some areas of concern to discuss:

1. The Owner was not sure if the feed storage area, bunkers, and catch basin were designed to contain the 25-year, 24-hour storm event. WPDES Permit Section 1.1
2. EPA observed during the walkthrough of the Facility that calf hutches were put in the ancillary area between the Freestall Barns 1 and 2. Calf Hutches are part of the production area and must comply with the WPDES Permit WI-0066346 Section 1.1 and Section 1.2.

3. EPA observed runoff coming from the milk storage area and under the doors toward the stormwater drain between Freestall Barns 1 and 2. The Owner stated that it was plate cooler water discharging from under the doors toward the north stormwater drain between Freestall Barn 1 and 2. Plate Cooler water is considered wastewater and must be collected as required by your WPDES Permit WI-0066346 Permit.
4. EPA observed clean sand stored on the north side of Freestall Barn 2, up slope of the north stormwater drain between Freestall Barns 1 and 2. WPDES Permit WI-0066346 Section 1.2
5. EPA observed clean sand stored up-slope of the roadside ditch on the north side of Freestall Barn 1. WPDES Permit WI-0066346 Section 1.2
6. The Owner stated to EPA that they do not sample the solids that are directly taken from the calf barns, heifer barn, and maternity barn that is directly applied to the fields. WPDES Permit WI-0066346 Section 1.7.2 and Section 1.8.1.

**Table 11: Areas of Concern**

|                                                                                                                           |                        |
|---------------------------------------------------------------------------------------------------------------------------|------------------------|
| <b>Were specific Areas of Concern discussed with facility personnel?</b>                                                  | Yes.                   |
| <b>Who were the Areas of Concern discussed with?</b> With the Owner.                                                      |                        |
| <b>Were any deficiencies or areas of concern addressed or fixed during the inspection? If so, list what was done.</b> No. |                        |
| <b>Compliance assistance materials given to facility personnel:</b>                                                       |                        |
| No materials were provided to the facility personnel.                                                                     |                        |
|                                                                                                                           |                        |
| <b>Exit Time:</b>                                                                                                         | 11:32 AM               |
| <b>Disposable Boots Left at Facility?</b>                                                                                 | Yes.                   |
| <b>Vehicle Washed after leaving facility?</b>                                                                             | Yes.                   |
| <b>Date and Time that vehicle was washed:</b>                                                                             | 3/19/2025 at 5:10 PM . |

**Table 12: Waterway Documentation**

|                                                                                           |
|-------------------------------------------------------------------------------------------|
| <b>List the pathway taken by EPA inspectors to document the waterway at the facility.</b> |
| Flow from the facility is to the south and west and into Jambo Creek.                     |

**Table 13: Sampling Information**

|                            |     |
|----------------------------|-----|
| <b>Were samples taken?</b> | No. |
|----------------------------|-----|