

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

Purpose:

Compliance Evaluation Inspection

Facility:

Quality Dairy, LLC
N 5232 BK Line Road
Luxemburg, Wisconsin 54217
Kewaunee County
44.513856937943395, -87.764180364316

NPDES Permit Number: WI-0059579

Date of Inspection: 06/05/2024

EPA Representatives:

Benjamin Atkinson, Agronomist 312-353-8243
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Joan Rogers, Environmental Scientist 312-886-2785
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State Representatives:

James Salscheider, Wastewater Specialist 920-367-3007
james.salscheider@wisconsin.gov

Joe Baeten, NR Basin Supervisor 920-366-2072
Joseph.Baeten@wisconsin.gov

Facility Representatives:

Glen Dufek, Owner/Operator 920-371-3682
gdufek@gmail.com

Report Prepared by:

Benjamin Atkinson, Agronomist

Inspector Signature: BENJAMIN ATKINSON  Digitally signed by BENJAMIN ATKINSON
Date: 2024.08.05 06:44:04 -05'00'

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

Approver Signature: Ryan Bahr  Digitally signed by Ryan Bahr
Date: 2024.08.05 09:50:20 -05'00'

1. BACKGROUND

The purpose of this report is to describe, evaluate and document Quality Dairy, LLC's compliance with the Clean Water Act (CWA) and its WPDES Permit at its Luxemburg, Wisconsin facility (Facility) on June 5, 2024. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

The Facility is a large dairy Concentrated Animal Feeding Operation. The Facility confines approximately 1900 mature (dry and milking) dairy cows. The Facility was purchased in 2022 and was previously De-Ran Dairy.

Surface water at the facility is either collected by a series of storm water drains which outlet to a grassed waterway in an adjacent agricultural field or surface flows to the adjacent agricultural fields. The grassed waterway flows northeast approximately 3 miles to School Creek. School Creek flows to the Kewaunee River which is a Traditionally Navigable Waterway.

The Facility has coverage under WPDES Permit WI-0059579. The permit was issued August 31, 2022. It has an effective date of September 1, 2022 and expiration date of August 31, 2027.

2. SITE INSPECTION

Table 1: Site Entry and Opening Conference

Arrival Time:	8:47 AM
Temperature:	67° F
Precipitation:	Light Rain
Presented credentials?	Yes
Credentials presented to whom and at what time?	Presented credentials to Glen Dufek – the Operator
Was an opening conference held? With whom?	Yes, Dan Davister, Glen Dufek, Larry (last name unknown)
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	Next to Milking Parlor
Disposable boots worn?	Yes
Other bio-security measures taken (state vet contacted, etc.):	Yes, state vet contacted, vehicle washed after inspection.

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

Checklist(s) Used
R5 CAFO Inspection Checklist

Table 3: Facility Description

Type of Animal	Number of Animals	Capacity	Type of Confinement
Dairy Cows, Mature (milking and dry)	1,900	1,900	Total
Minimum Number of Animals in previous 5 years:			1,900
Maximum Number of Animals in previous 5 years:			1,900
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			1,900
Amount of Liquid Manure Generated per year:			Approximately 32 million gallons
Amount of Solid Manure Generated per year:			Approximately 250 tons
Does the facility have an NPDES Permit?			Yes
SIC or NAICS code:			0241
Do animals have direct access to WOUS?			No
Are crops, vegetation, forage growth, or post harvest residues not sustained in the normal growing season over any portion of the lot or facility where animals are kept?			Yes
What is the area (acres) of the production area?			Approximately 20 Acres
What is the area (acres) of the pasture?			0
How many employees (not counting family members)?			15
Other facilities under common ownership (name and address):			None

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Days of Storage
Pond	~20 M Gallons	Clay	Yes	May 2024	264 Total
Pond	~ 1 M Gallons	Concrete	No	May 2024	
Records at site of storage structure design?				Yes- kept electronically	

Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	No
Are records kept of the level of manure in the storage structures?	Yes
When was the last time a storage structure was emptied, either partially or completely?	May 2024
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	Not known at time of inspection
Do the facility personnel inspect and keep records of all diversion devices?	Yes
Do the facility personnel inspect and keep records of all impoundments?	Yes
Do the facility personnel inspect and keep records of all the water lines?	Yes
Do the facility personnel perform routine visual inspections and keep records of the production area?	Yes
Does the waste storage system have a managed outfall or discharge point? If yes, provide a description of the outfall and a description of the area receiving the discharge.	No
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	No

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
Manure from Barns 1, 2, and 3 is automatically scraped and pumped to Manure Storage 2. Manure from the Dry Cow Barn is pumped to Manure Storage 1.	
Describe the way used bedding is collected and disposed of at the facility:	
Composted manure solids are used as bedding. Used bedding is collected and disposed of with manure.	
Are mortality records kept?	Yes
Describe the way mortalities are managed at the facility:	
Mortalities are placed in a collection area and picked up daily by a milk farm.	
What type of method is used to provide drinking water for the animals? (Drinkers with float system? Nipple waters? If nipple waters, is backflow prevention installed?)	Drinking water is provided in tanks with floats. Spilled water is collected and disposed of with manure.
Describe the way mist cooling water is collected and disposed of at the facility:	
Collected and dispose of with manure.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
Chemicals are stored in a storage room in the Milking Parlor. Any spills would flow to a floor drain and to Manure Storage 2.	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
No barn flush water is used.	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
Feed is stored on an asphalt and concrete pad with full collection of all runoff.	
If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:	

Plate cooler water is used to water cows.	
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:	
Parlor wash water is collected and disposed of with manure.	
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:	
Milk tankers are used.	
If a dairy, how many times per day are cows milked?	Cows are milked three times a day. The Operator pointed out that the number of times a day a facility milks is a poor determiner of the volume of water used and pointed out that they had taken steps to substantially reduce the amount of wash water generated at the facility beyond what other facilities that milk twice a day produce.

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
When was the last time a sample was taken of the manure and/or process wastewater?	May 2024
Describe the process to take the manure and/or process wastewater sample.	Manure samples are collected when manure pumped following agitation.
Number of acres available for land application:	Approximately 4,000 acres.
Are land application records kept?	Yes
Who applies the manure and process wastewater to the fields?	The Facility
Are weather conditions at time of application kept? (24 before – 24 after)	Yes
Does the facility perform and keep records of the soil testing?	Yes
Is manure transferred off-site to another party?	No
Do facility personnel perform periodic inspection of land application equipment?	Yes

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
Surface water at the facility is either collected by a series of storm water drains which outlet to a grassed waterway in an adjacent agricultural field or surface flows to the adjacent agricultural fields. The grassed waterway flows northeast approximately 3 miles to School Creek. School Creek flows to the Kewaunee River which is a Traditionally Navigable Waterway.	
How many months out of the year is there flow in the nearest surface water pathway:	The Operator stated that the grassed waterways only flow in response to precipitation.
Are there any storm water pathways entering the facility?	There are two grassed waterways that flow into a culvert under the Facility from the south and outlet on the northeast side of the Facility.
Are there any clean water ponds on site?	No
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	Kewaunee River
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Ephemeral
Has the surface water pathway nearest to the facility been assessed for water quality?	No

Table 8: Nutrient Management Plan

NMP on site?	Electronically
Date NMP Submitted:	2022
Planner Name/Company:	United Coop
Date that the NMP was last updated:	March 2024
Storage Description:	

Table 9: NPDES Permit

Type of permit (General, individual)	Individual
Is a copy of the permit on site?	Electronically
Date that the permit was issued:	08/31/2022
Date that the permit will expire:	08/31/2027
Does the permit contain a compliance schedule? If yes, provide a detailed description of the requirements and the status.	The permit requires an engineering evaluation of Waste Storage 2.

Have there been any changes made to the production area since the permit was issued? If yes, provide a detailed description.	No
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2.2 Walkthrough of the Facility

Ben Atkinson and Joan Rogers of the US EPA (the Inspectors) arrived onsite at 8:47 AM. James Salscheider and Joe Baeten of WDNR (WDNR) arrived concurrently. The Inspectors donned their biosecurity boots and made contact with the Operator by phone. The Operator agreed to come meet them at the Facility. Following the Operator's arrival, EPA presented their credentials, explained the purpose of the Inspection, and confirmed that they were parked in an appropriate location. The Inspectors and the Operator then went into an office and conducted the opening conference and interview portion of the inspection. Following the interview, the Inspectors, WDNR, the Operator and his representatives began the walkthrough of the Facility.

The walkthrough began on the south side of the Milking Parlor. The Inspectors walked east in the grassed area north of Barn three and observed a storm water drain inlet near the east end of the grassed area (photo 1). The Inspectors then walked west along the north side of Barn 3 and across west end (photos 2 and 3). The Inspectors observed a bunker on the west end of Barn 3 with a pipe through the concrete at ground level. There were some organic solids around the west side of the bunker. No surface water flow paths were observed from the area.

The Inspectors walked east along the south side of Barn 3 and observed the two grassed waterways flowing into the culvert under the Facility from the South (photos 4-6).

The Inspectors continued walking east and arrived at Manure Storage 2. The Inspectors observed an animal burrow on the berm of Manure Storage 2 and pointed it out as an area of concern to the Operator. The Inspectors walked south along west side of Manure Storage 2 and observed an additional animal burrow (photo 8). The Inspectors walked south, around the southern end of Manure Storage 2 and then walked north along the east side (photos 9-11). The Inspectors observed indentions left in the pit's berm by the agitator being lowered in (photo 12). WDNR advised that the indentions could lead to erosion and compromising of the clay liner and recommended addressing the indentions. Additionally, WDNR pointed out that the concrete pad in the northwest corner of Manure Storage 2 had been undercut by erosion and should be addressed. The Inspectors walked west along the north side Manure Storage 2 and observed the depth marker for Manure Storage 2 (photo 13).

The Inspectors then walked northeast to the outlet of the culvert observed previously on the south side of the Facility (photos 14-16).

The Inspectors then walked north and observed Manure Storage 1 (photos 17 - 19). The Inspectors did not observe a depth marker present in Manure Storage 1. The Inspectors

did observe a pipe coming through the wall of the Dry Cow Barn (photo 20). The Inspectors observed an erosional pathway from the area around the pipe down to Manure Storage 1. The Operator stated that this pipe connected to a hand washing sink located in the maternity area.

The Inspectors then walked back southwest to the east end of Barn 3. The Inspectors observed a stormwater drain surface inlet in the gravel area (Photo 21). The Inspectors then walked west in the grassed area between Barn 3 and Barn 2. The Inspectors observed a stormwater drain surface inlet near the west end of the grassed area (photo 22). The Inspectors then walked east and observed the mortality staging area located at the southeast corner of Barn 2 (photos 23 and 24). The Inspectors observed and noted to the Operator that, while no runoff was observed, it appeared that there was the possibility for runoff from the mortality staging area to flow to the grassed area between Barn 2 and Barn 3 and then to the stormwater drain. The Operator stated that he would look into using a covered shed at the northeast corner of Barn 2 as a mortality staging area (photo 25).

The Inspectors then walked west to the west end of the grassed area between Barn 2 and Barn 1. The Inspectors observed a stormwater drain surface inlet (photos 26 and 27). The Inspectors then walked east to the east end of Barn 1 and observed series of stormwater drain surface inlets located between the Dry Cow Barn and the Commodity Building (photos 28-31).

The Inspectors walked south to the southern end of the Commodity Building and then north between the east side of the feed pad and the west side of the Commodity Building (photos 32 and 33). The Inspectors continued walking north and observed a pipe under the access road that could convey stormwater from the north end of the grassed area between the Commodity Building and the feed pad to the roadside ditch south of Luxemburg Road (photos 34 and 35).

The Inspectors then walked west across the north end of the feed pad and observed a pipe outletting on the north side of Luxemburg Road north of the northwest corner of the feed pad (photo 38). The Inspectors then walked south along the west side of the feed pad and observed two stormwater drain surface inlets in the grass between the feed pad and BK Line Road (photos 39 and 41). The Inspectors also observed an area where it appeared wind had blown feed over the berm of the feed pad (photo 40).

The Inspectors then walked south to the southwest corner of the feed pad and then east. The Inspectors observed the runoff collection drain that collects the runoff from the feed pad (photo 42).

The Inspectors then walked west around the west end of Barn 1 and then east to the east end of the grassed area between Barn 1 and the Milking Parlor. The Inspectors observed a stormwater drain surface inlet (photo 46). Inside the stormwater drain, the Inspectors observed a white pipe with trace wire entering the drain from the southwest (photo 45). The Inspectors walked southwest to the plate cooler tank and behind the tank they

observed a white pipe coming out of the wall of the animal walkway to the Milking Parlor (photo 47). The Inspectors observed that there was manure around the base of the pipe and on the wall around where the pipe penetrated the wall. The Operator stated that he believed the pipe was coming from a groundwater sump in the basement below the Milking Parlor and that the manure was being pushed around the pipe from the animal walkway but not entering or flowing through the pipe.

The Inspectors then walked west and observed a surface drain near the milk tanker parking area (photo 48). The Operator stated that this drain was not connected to the rest of the storm water drains. This drain is collected and sent to storage. He stated that WDNR had required that this drain collect any milk tank wash water. The inspectors then walked south and observed a stormwater drain surface inlet near the northwest corner of the Milking Parlor (photo 49).

This concluded the walkthrough of the Facility. The Inspectors and the Facility personnel then returned to office for the closing conference.

2.3 Closing Conference and Post-Inspection

Table 10: Post Walk-Through

Was a closing conference held? With whom?	Yes, the Operator
Were specific Areas of Concern discussed with facility personnel?	Yes
Who were the Areas of Concern discussed with?	The Operator
Were any deficiencies or areas of concern addressed or fixed during the inspection? If so, list what was done.	No
Exit Time:	12:15 PM
Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes

3. AREAS OF CONCERN

EPA observed these areas of concern:

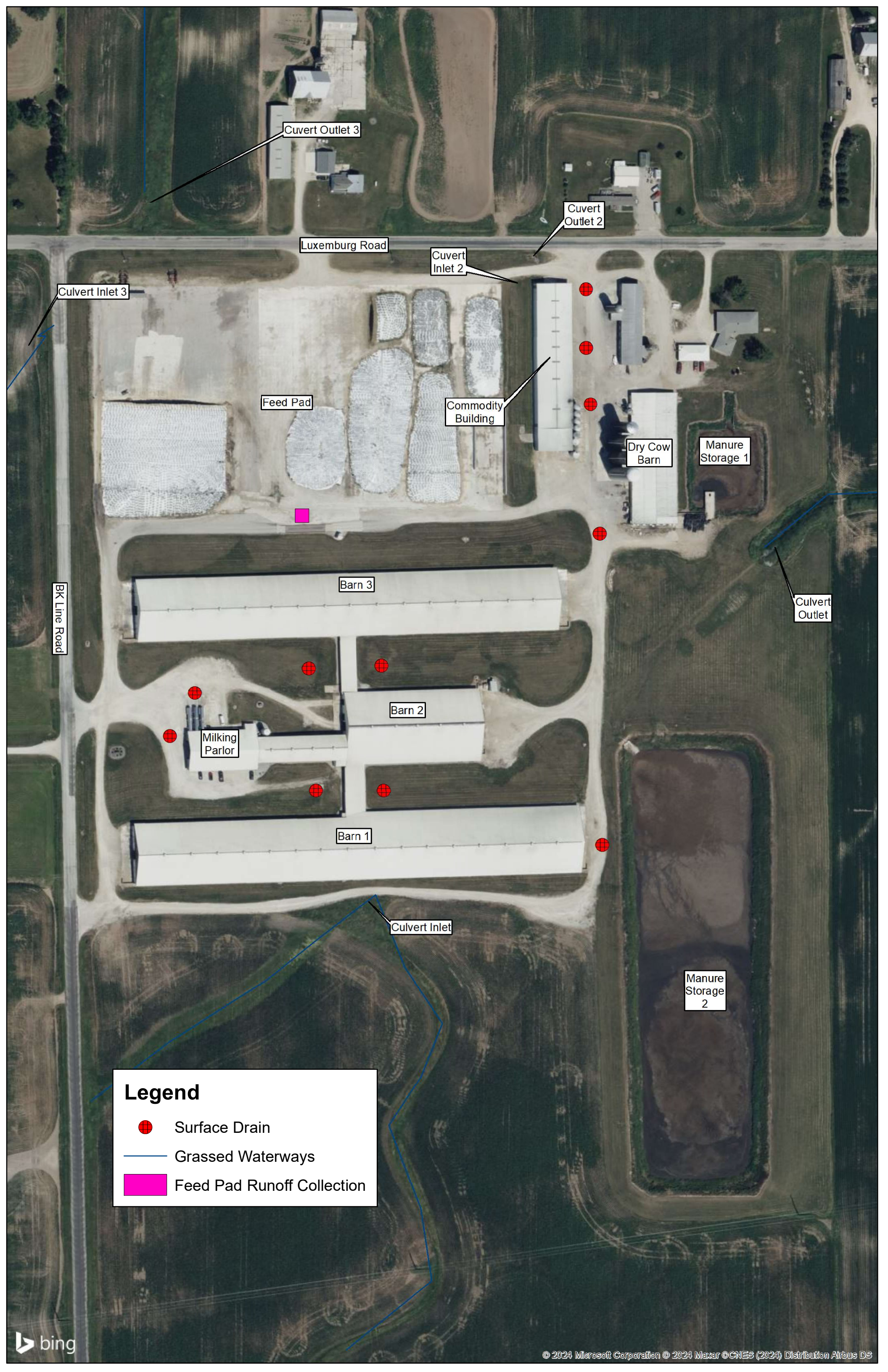
1. Lack of containment around the bunker at the southwest corner of Barn 3.
2. Animal burrows in the berm along Manure Storage 2.
3. Agitator wheel ruts in Manure Storage 2 creating the potential for liner erosion.
4. The concrete pad in Manure Storage 2 being undercut.
5. Lack of containment around the mortality staging area.
6. Feed outside the berm on the west side of the feed pad.

7. The PVC pipe entering the stormwater drain between Barn 1 and the Milking Parlor

4. LIST OF ATTACHMENTS

- A) Aerial photograph of Quality Dairy, LLC with buildings, waterways and discharge pathways labeled.
- B) Photo Log

Attachment A - Aerial Photo



Legend

-  Surface Drain
-  Grassed Waterways
-  Feed Pad Runoff Collection

Attachment B - Photo Log

Quality Dairy, LLC
EPA Inspection June 5, 2024
All photos taken by Joan Rogers, Environmental Scientist, U.S. EPA
Camera: Olympus TG-4



1: P6050658

Description: Storm water drain located between Barn 3 and the parlor walkway.

Location: Grassed area on the south side of the parlor walkway.

Camera Direction: West Date/Time: June 5, 2024 9:49 AM



2: P6050659

Description: Looking east along the south side of Barn 3. Note the drain at the bottom of the temporary bunker.

Location: Southwest corner of Barn 3.

Camera Direction: East Date/Time: June 5, 2024 9:51 AM



3: P6050660

Description: Looking southeast into the temporary bunker located at the southwest corner of Barn 3.

Location: Southwest corner of Barn 3.

Camera Direction: Southeast

Date/Time: June 5, 2024 9:52 AM



4: P6050661

Description: Looking southwest along grassed waterway that flows into culvert under the Facility.

Location: Centrally south of service road along the south side of Barn 3.

Camera Direction: Southwest

Date/Time: June 5, 2024 9:55 AM



5: P6050662

Description: Looking southeast along additional grassed waterway which flows into culvert under the Facility.

Location: Centrally south of service road along the south side of Barn 3.

Camera Direction: Southeast Date/Time: June 5, 2024 9:55 AM



6: P6050663

Description: Looking down at the confluence of the two grassed waterways as they enter the culvert under the Facility.

Location: Centrally south of service road along the south side of Barn 3.

Camera Direction: Down Date/Time: June 5, 2024 9:56 AM



7: P6050664

Description: Animal burrow in the west bank of Manure Storage 2.

Location: Centrally located on the west side of Manure Storage 2.

Camera Direction: East Date/Time: June 5, 2024 10:02 AM



8: P6050665

Description: Additional animal burrow on the side of Manure Storage 2 near the southwest corner.

Location: Southwest corner of Manure Storage 2.

Camera Direction: East Date/Time: June 5, 2024 10:04 AM



9: P6050666

Description: Looking northwest from the southeast corner of Manure Storage 2.

Location: Southwest corner of Manure Storage 2.

Camera Direction: Northwest Date/Time: June 5, 2024 10:07 AM



10: P6050667

Description: Looking northwest from the east side of Manure Storage 2. Note that the concrete pad built to protect the storage structures bank has been undercut and there is erosion on the internal walls of the pond.

Location: Centrally on the east side of Manure Storage 2.

Camera Direction: Northwest Date/Time: June 5, 2024 10:11 AM



11: P6050668

Description: Looking South along the east side of Manure Storage 2.

Location: Northeast corner of Manure Storage 2.

Camera Direction: South Date/Time: June 5, 2024 10:14 AM



12: P6050669

Description: Erosion in wheel ruts from where equipment was lowered into Manure Storage 2 on the north side.

Location: North side of Manure Storage 2.

Camera Direction: Down Date/Time: June 5, 2024 10:15 AM



13: P6050670

Description: Depth marker for Manure Storage 2 (red arrow).

Location: Northwest corner of Manure Storage 2.

Camera Direction: Down Date/Time: June 5, 2024 10:16 AM



14: P6050671

Description: Outlet of culvert under the Facility from the south side.

Location: East side of the Facility, south of Manure Storage 1.

Camera Direction: Southwest Date/Time: June 5, 2024 10:20 AM



15: P6050672

Description: Outlet of culvert under the Facility from the south side.

Location: East side of the Facility, south of Manure Storage 1.

Camera Direction: Southwest

Date/Time: June 5, 2024

10:20 AM



16: P6050673

Description: Downstream along waterway flowing out of culvert under the Facility.

Location: East side of the Facility, south of Manure Storage 1.

Camera Direction: Northeast

Date/Time: June 5, 2024

10:20 AM



17: P6050674

Description: Looking northwest from the south side of Manure Storage 1. The pier in Manure Storage 1 is left over from a previous manure handling system.

Location: South side of Manure Storage 1.

Camera Direction: Northwest Date/Time: June 5, 2024 10:22 AM



18: P6050675

Description: Looking north at Manure Storage 1.

Location: South side of Manure Storage 1.

Camera Direction: North Date/Time: June 5, 2024 10:22 AM



19: P6050676

Description: Looking east from the west side of the southwest corner of Manure Storage 1. Note the outlet of the manure pipe from the Dry Cow Barn (red arrow).

Location: West side of the southwest corner of Manure Storage 1.

Camera Direction: East Date/Time: June 5, 2024 10:30 AM



20: P6050677

Description: Pipe in the wall on the east side of the Dry Cow Barn. Operator stated that his pipe connected to a sink in the maternity pin. The eroded flow to the left led down toward Manure Storage 1.

Location: East side of the Dry Cow Barn.

Camera Direction: Down Date/Time: June 5, 2024 10:32 AM



21: P6050678

Description: Stormwater drain inlet located at the east end of Barn 3.

Location: Gravel area east of Barn 3.

Camera Direction: South Date/Time: June 5, 2024 10:36 AM



22: P6050679

Description: Stormwater drain inlet located centrally between Barn 2 and Barn 3 west of the walkway.

Location: Centrally between Barn 2 and Barn 3 west of the walkway

Camera Direction: North Date/Time: June 5, 2024 10:40 AM



23: P6050680

Description: Mortality holding area located at the east end of Barn 2. Note potential flow path from the mortality holding area to the south toward the grassed area between Barn 2 and Barn 3 (blue arrow).

Location: Southeast corner of Barn 2.

Camera Direction: North Date/Time: June 5, 2024 10:42 AM



24: P6050681

Description: Mortality holding area located at the east end of Barn 2. Note potential flow path from the mortality holding area to the south toward the grassed area between Barn 2 and Barn 3 (blue arrow).

Location: Southeast corner of Barn 2.

Camera Direction: South Date/Time: June 5, 2024 10:43 AM



25: P6050682

Description: Covered shed (left) to which the Operator proposed moving the mortality holding area and hydrated lime storage container (right).

Location: Northeast corner of Barn 2.

Camera Direction: North Date/Time: June 5, 2024 10:44 AM



26: P6050683

Description: Looking east along the north side of Barn 2.

Location: Northwest corner of Barn 2.

Camera Direction: East Date/Time: June 5, 2024 10:47 AM



27: P6050684

Description: Looking east across grassed area between Barn 2 (right) and Barn 1 (left). Note stormwater surface drain inlet (blue arrow).

Location: West end of the grassed area between Barn 2 and Barn 3.

Camera Direction: East Date/Time: June 5, 2024 10:48 AM



28: P6050685

Description: Stormwater surface drain inlet located in access road northeast of Barn 1.

Location: Northeast corner of Barn 1.

Camera Direction: East Date/Time: June 5, 2024 10:52 AM



29: P6050686

Description: Stormwater surface drain inlet (blue arrow) west of dry cown barn and east of Commodity Barn.

Location: Between Dry Cown Barn and Commodity Barn.

Camera Direction: South Date/Time: June 5, 2024 10:54 AM



30: P6050687

Description: Looking north toward stormwater suface drain inlet (blue arrow) north of drain seen in photo 29.

Location: Between Dry Cown Barn and Commodity Barn.

Camera Direction: North Date/Time: June 5, 2024 10:55 AM



31: P6050688

Description: Additional stormwater surface drain inlet (blue arrow) east of the east end of the Commodity Barn.

Location: East of the Commodity Barn.

Camera Direction: North Date/Time: June 5, 2024 10:55 AM



32: P6050689

Description: Looking north into the south end of the Commodity Barn where they store bedding.

Location: South end of the Commodity Barn.

Camera Direction: North Date/Time: June 5, 2024 10:58 AM



33: P6050690

Description: Looking south between bunker (right) and west side of the Commodity Barn (left).

Location: Between bunker and Commodity Barn.

Camera Direction: South Date/Time: June 5, 2024 11:01 AM



34: P6050691

Description: Inlet for stormwater culvert (blue arrow) under access road.

Location: Northwest corner of the Commodity Barn.

Camera Direction: Northeast Date/Time: June 5, 2024 11:02 AM



35: P6050692

Description: Outlet of stormwater culvert under access road to roadside ditch on the south side of Luxemburg Road.

Location: South of Luxemburg Road and north of the northwest corner of the Commodity Barn.

Camera Direction: Northeast

Date/Time: June 5, 2024

11:02 AM



36: P6050693

Description: Looking west along the north side of the feed pad.

Location: Northeast corner of the feed pad.

Camera Direction: West

Date/Time: June 5, 2024

11:03 AM



37: P6050694

Description: Looking south at a mound of feed not yet covered.

Location: Centrally on the north side of the feed pad.

Camera Direction: South Date/Time: June 5, 2024 11:05 AM



38: P6050695

Description: Looking north downstream along the waterway on the north side of Luxemburg Road

Location: Northwest of the Facility, north of Luxemburg Road.

Camera Direction: North Date/Time: June 5, 2024 11:06 AM



39: P6050696

Description: Looking south along the west side of the feed pad east of County Line Road. Note stormwater surface drain inlet (blue arrow).

Location: West side of feed pad.

Camera Direction: South Date/Time: June 5, 2024 11:10 AM



40: P6050697

Description: Feed observed beyond outside of the berm on the west side of the feed pad.

Location: West side of the feed pad.

Camera Direction: Southeast Date/Time: June 5, 2024 11:10 AM



41: P6050698

Description: Stormwater drain surface inlet (blue arrow) in grass area west of the southwest corner of the feed pad.

Location: West of the southwest corner of the feed pad.

Camera Direction: West Date/Time: June 5, 2024 11:14 AM



42: P6050699

Description: Feed pad leachate collection inlet (blue arrow) on the south side of the feed pad.

Location: Centrally on the south side of the feed pad.

Camera Direction: Northwest Date/Time: June 5, 2024 11:19 AM



43: P6050700

Description: Looking southwest at the plate cooler water tank.

Location: grassed area south of Barn 1 and west of animal walkway.

Camera Direction: Southwest Date/Time: June 5, 2024 11:28 AM



44: P6050701

Description: Looking down into interior of the stormwater drain at the east end of the grassed area between Barn 1 and the milking Parlor.

Location: East end of the grassed area between Barn 1 and the milking Parlor.

Camera Direction: Down Date/Time: June 5, 2024 11:29 AM



45: P6050702

Description: Looking down into interior of the stormwater drain at the east end of the grassed area between Barn 1 and the milking Parlor. Note white PVC pipe entering stormwater drain from the southwest with locator wire.

Location: East end of the grassed area between Barn 1 and the milking Parlor.

Camera Direction: Down Date/Time: June 5, 2024 11:30 AM



46: P6050703

Description: Looking southwest toward the plate cooler water tank (red arrow). Stormwater drain surface inlet in foreground (blue arrow).

Location: grassed area south of Barn 1 and west of animal walkway.

Camera Direction: Southwest Date/Time: June 5, 2024 11:31 AM



47: P6050704

Description: White PVC pipe with locator wire protruding the side of the animal walkway. Note manure around PVC pipe and on ground. The operator suspected that the white pipe is from a groundwater sump pump in the basement and that the area around the pipe was not well sealed allowing manure from the animal walkway to escape but he believed that no manure or process wastewater was in the pipe.

Location: Northeast corner of the Milking Parlor.

Camera Direction: Southeast

Date/Time: June 5, 2024

11:34 AM



48: P6050705

Description: Stormwater collection inlet at milk tanker parking. The Operator stated that stormwater collected by this drain was sent to storage.

Location: North of the northwest corner of the Milking Parlor.

Camera Direction: South

Date/Time: June 5, 2024

11:39 AM



49: P6050706

Description: Looking east at storwater surface drain inlet west of the northwest corner of the Milking Parlor.

Location: Northwest of the Milking Parlor.

Camera Direction: East Date/Time: June 5, 2024 11:41 AM