

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection February 13, 2002 Identification Number WMGR025SE001

Company/Facility/Site Name Nutra-Soils, Inc.

An inspection of Nutra-Soils, Inc. located in London Grove Township, Chester County was conducted on February 13, 2002, by Mr. Kevin Bauer of the Department. Mr. Carlos Tenorio and Mr. Phil Guenzer were present for Nutra-Soils. The following observations were noted:

1. Nutra-Soils, Inc. operates under general permit No. WMGR025SE001 for the composting of spent mushroom substrate (SMS) and other agricultural wastes as identified in the permit for use as soil substitute, soil amendments, fertilizer, or mulch.
2. Composting operations are currently occurring on all four wharfs (1A, 2A, 2B, & 2C). Daily records of the windrows on each pad were reviewed. The records show the starting date and temperature of each windrow. The daily site inspection sheets were also reviewed. The daily inspection includes the maintenance completed on the pad, the turning of the windrows, any spray irrigation, odor and dust controls taken, and other activities.
3. The outlet screens for the sedimentation basins by pads 2A-C should be immediately cleaned of all debris. The screens were clogged causing the leachate to pond. Nutra-Soils should notice such items during the daily inspection and then correct the problem. The pads were adequately compacted and graded so as to prevent the ponding of leachate on the pad. This action corrects the violation noted in section 2 of the March 13, 2001 inspection report.
4. Records of incoming and outgoing materials were reviewed. The facility is currently accepting water treatment plant (WTP) sludge, paper sludge, lime slag, and silica waste as co-products. Co-product determinations for drinking water residuals from the Stoney Garden Treatment Plant in Nazareth, PA and from the PA American Water Plant in Norristown, PA were reviewed. The Stoney Garden shipment is a once every three years delivery of approximately 300 tons. Approximately 30 tons of residuals come from the Norristown plant every week. The paper sludge comes from Plainwell Tissues. The co-product determination was reviewed in the past. Silica waste comes from PQ Corp and lime slag is obtained from Griffin Pipe Products. Co-Product determinations were obtained.
5. The annual operations report for the facility was received by the Department on February 6, 2002. The general permit states that the annual report is due on the anniversary date (August 3) that the permit was issued to the permittee; however, it was agreed by this inspector and Mr. Guenzer that the report can be submitted for a calendar year (Jan. 1 - Dec. 31), not a permit year. Records at the facility are maintained on a calendar year.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Phil Guenzer Date 2/13/2002

Inspector (signature) Kevin C. Bauer Date 2/13/2002

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6. Condensate from the drying unit is now collected in a tank on the unit, piped to an underground tank, and then pumped into the sedimentation pond of pad 1.

7. Large piles of finished product continue to be stored off the pads and over the 15-acre storage limit for general permit No. WMGR025. Piles of finished compost stored on pads 2A-C are slightly off the edge of the pads. The large pile of finished compost in the field across from pad 2C is approximately one-half the size that it was during the March 13, 2001 inspection, but it is still there and over one year. To the north and south of pad 1, Nutra Soils continues to store large piles of finished compost off of the pad. Large quantities of leachate are being generated off the pad and ponding in areas. Strong odors are being generated in the areas of the ponded leachate and where the finished compost is sitting in leachate. As stated in the March 13, 2001 report, the storage of raw materials, SMS, and finished product should be within 15 acres and on a composting pad constructed of concrete, asphalt, or similar materials (low permeability earthen pad). The pad should be in a well-drained area and prevent ponding. The storage over 15 acres and not on an approved pad is a violation of conditions 5, 10, 11, 12, and 14 of general permit No. WMGR025SE001. Nutra-Soils is therefore not eligible to operate under the general permit and is operating without a permit. Operation of a residual waste disposal and processing facility without a permit is a violation of 25 Pa. Code Section 287.101(a). Mr. Guenzer has contacted the Department's Central Office in Harrisburg and is attempting to modify the general permit to include additional materials and increase the size of a facility permitted under the general permit. In the meantime, Nutra-Soils should try to modify the areas north and south of pad 1 so that leachate drains down to the sedimentation basin and does not pond. By preventing the piles from sitting in leachate, fewer odors should be generated.

8. On the western end of pad 1, there is a large pile of SMS that has been passively composting for over one year. According to Mr. Tenorio, the SMS was passively composted because there was no room left on the pads. The general permit allows the use of windrows, aerated static piles, or within an enclosed vessel. Storage of compost should also be for less than one year. This pile, as well as the pile in the field across from pad 2C, has been there for over one year. The failure to use windrows, etc and the storage over one year is a violation of conditions 3 and 12 of the general permit. Nutra-Soils should attempt to use these piles before others in the bagging operation.

9. Nutra-Soils continues to receive stumps and other land clearing debris. The material is collected over a year, processed in a grinder, allowed to sit for a year, and then processed in a grinder again. The mulch is then bagged

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Person interviewed (signature) *Phil King* Date 2/13/2002Inspector (signature) *Terrill C Bauer* Date 2/13/2002

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and sold. As soon as the Department's land clearing and grubbing waste best management practices manual is completed, Nutra-Soils will be provided with a copy. The storage limit of the material may be an issue and need to be resolved.

Operation of the facility contrary to the conditions of the general permit is a violation of 25 Pa. Code Section 287.652.

Within fourteen (14) days of the receipt of this report, Nutra Soils should submit to the Department a schedule and plan detailing what actions will be taken to address the above violations and concerns.

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Person interviewed (signature) Phil Hughes Date 2/13/2002

Inspector (signature) Ken C. Bauer Date 2/13/2002



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
March 4, 2002

Southeast Regional Office

610-832-6212
Fax 610-832-6143

NOTICE OF VIOLATION

Mr. Michael Losito
Nutra Soils, Inc.
181 Willow Street
P.O. Box 485
Toughkenamon, PA 19374

Re: Routine Inspection
February 13, 2002
Nutra Soils, Inc.
London Grove Township
Chester County
General Permit No. WMGR025SE001

Dear Mr. Losito:

This letter is to confirm the findings of the Department of Environmental Protection's (Department) February 13, 2002, inspection of your residual waste activities. Requirements for residual waste facilities are contained in the Solid Waste Management Act, Act of July 7, 1980, P. L. 380, No. 97, as amended, 35 P.S. Sections 6018.101 et seq. (SWMA, Act 97), and in Chapters 287 through 299 of the Rules and Regulations of the Department. Violations observed during the inspection are as follows:

- A. Large piles of finished compost are stored over the edges of Pads 2A – C, in half of the field across from Pad 2C, and to the north and south of Pad 1. A composting facility, as defined in the General Permit, includes all raw materials and waste storage areas, the composting and curing areas, and the finished compost storage area. To operate under General Permit No. WMGR025SE001, the composting facility should not exceed fifteen (15) acres. Nutra Soils' storage of finished product, raw materials, and spent mushroom substrate (SMS) is in an area greater than fifteen (15) acres. This is contrary to permit Condition No. 5. The storage of the finished compost is in areas not delineated in Nutra Soils' General Permit application and drawings. This is contrary to permit Condition No. 34.



Mr. Michael Losito

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March 4, 2002

If you have any questions concerning this matter, please do not hesitate to call me at 610-832-6181.

Sincerely,

A handwritten signature in cursive script that reads "Kevin C. Bauer".

Kevin C. Bauer
Waste Management Specialist
Waste Management Program

cc: Mr. Bonner
Ms. Roncetti
Mr. Bigelow
Mr. Socash
London Grove Township
Re 30 (RN02)060-22