

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

Inspection Report Comments

Date of Inspection February 13, 2003 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, 2003, by Mr. Kevin Bauer of the Department. Mr. Carlos Tenorio, Mr. Phil Guenzer, and Ms. Rose Vazquez-Moses 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 were reviewed. The records show the starting date and temperature of each windrow as well as when the windrows are turned. The windrows are being turned every two to four weeks. Nutra Soils should ensure that the piles are sufficiently aerated so as to reduce the potential for odors. Odors were minimal to non-existent around the composting pads. Odors were moderate around the drying and bagging operations.

The daily site inspection sheets for 2002 and 2003 were 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 windrows on the pads are partially frozen and have not been turned for quite some time. As soon as the material thaws or when conditions allow, whichever is earlier, the windrows should be turned. Nutra Soils should also ensure that the piles are not directly next to each other and that accumulated SMS on the pads is scraped away so as to allow for the draining of leachate from the pads into the collection basins. Leachate should not pond on the pads. The roads around the facility especially in the area of the dryer and bagging operations should be cleaned routinely so as to ensure the removal of accumulated soil and composted SMS. Mr. Tenorio stated that this is conducted daily and that these areas are also sprayed with water, as needed, to minimize dust.

Finished compost is currently being stored along the northern edge of pads 2 B & C and by the dryer and bagging operations. The western side of the storage pile by the dryer should be consolidated such that the material is not spread out as much.

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) [Signature] Date 2-13-03

Inspector (signature) [Signature] Date 2/13/2003

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4. Records of incoming and outgoing materials were reviewed. The facility is currently accepting water treatment plant (WTP) sludge, paper sludge, and waste silica gel as co-products. A co-product determination for the paper sludge coming from the Newark Boxboard Company was obtained. Nutra Soils has also been receiving concrete waste from two sources and using the material as roadbed and structural fill. Records of bags (six distributors) and bulk composted SMS loads shipped from the facility as well as SMS received at the facility were inspected. The exact source of the incoming SMS should be specified on the records. The majority of the SMS is currently coming from Elite Mushroom. Frebro transports it Nutra Soil. The records should indicate which mushroom house of Elites it is coming from. Small amounts of SMS are coming from HMR. The amount of SMS coming into the facility has drastically been reduced over the past year, even with reduced dumping fees by Nutra Soils. Nutra Soils should ensure that it is supplying each customer with Appendix A – User Information of the general permit.

5. During the last routine inspection, it was agreed by this inspector and Mr. Guenzer that the annual 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. Nutra Soils should submit the report as soon as possible.

6. The piles of finished SMS that were stored to the north and south of pad 1 and across from pad 2A have been removed. This action corrects the storage violation (over 15 acres and off of permitted areas) that has been noted in previous inspection reports. Nutra Soils has submitted a revised site map to the Department for review. This map will delineate the storage and composting areas much more effectively than the previous map.

7. The pile of SMS that was passively composting on the western end of pad 1 has been removed.

8. Nutra Soils currently has approximately 150 – 200 tote bags of silica gel located along the western side of pad 1. The Department is still reviewing the co-product for this material. The material is slowly added to the SMS during the composting stage.

9. There is one windrow of leaves just off the southern edge of pad 1.

10. Nutra Soils should clean up any loose cardboard and plastic in the bagged compost and mulch storage areas.

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11. As soon as possible, Nutra Soils should use up the remaining wood chips it obtained from Shelton's Pallet Company. The facility continues to receive stumps and tree debris and grinds it accumulates.

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 concerns.

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