

# ***SOLID WASTE MANAGEMENT MINOR PERMIT MODIFICATION***

***NATURAL SOIL PRODUCTS***  
**2286 East Center Street**  
**Tremont, PA**  
**Frailey Township, Schuylkill County**

**I. D. No. 101628**

PREPARED BY:



**MAVICKAR Environmental Engineering Consultants**  
Environmental Engineers & Planners

2000 Bonita Court  
Harrisburg, PA 17110-3572

**JUANARY 2026**

**Natural Soil Products Company**

2286 East Center Street

P.O. Box 283

Tremont, PA 17981

Phone: 570-695-2525 Fax: 570-695-2568

June 23, 2026

David F. Matcho, P.E.  
Environmental Engineer Manager  
Pennsylvania Department of Environmental Protection  
Waste Management Program  
North East Regional Office  
2 Public Square  
Wilkes-Barre, PA 18701-1915

RE: Response to Technical Deficiency Letter Dated April 8, 2026

Minor Permit Modification Application – Compost Drying Capability

Application# 101628-A261

ASP ID#1157173, AUTH ID #1560318

Frailey Township, Schuylkill County

Dear Mr. Matcho,

Submitted herein is the response to the Technical Deficiency Letter dated April 8, 2026 as per meetings of April 22, 2026 at your office and June 11, 2026 at Natural Soil Products (NSP) facility with you and Roger Bellis.

1) **FORM GIF :**

(a) Volumes listed on the Form GIF are based on the Permit Limit of 350TPD Average Monthly Daily, 6 days per week. The Annual Average Tonnage is 109,200 Tons and will be corrected.

(b) The Environmental Justice (EJ) section will be correct to reflect the determination by the Department.

2) **Project Narrative:**

Project Narrative has been expanded to describe:

(1) Enhanced description of the drying process using the Motorized Komptech Model X 67 Top Turner Compost machine.

(2) Use of Inoculant technology to both help reduce moisture and odors during cold weather season.



### **3) FORM N:**

(a) As discussed in the April 22<sup>nd</sup> meeting, there are NO unprocessed biosolids stored on-site at the end of the operating day. All incoming biosolids are processed and taken to the Gore Bunker. The description in Form N will be corrected to reflect this.

(b) NSP has been involved in converting approximately 700+ acres of "Pre-Act" mining lands for the last 15 years, into agricultural land use. These "Pre-Act" mining lands are adjacent to and within a 3 mile radius of the NSP facility. This activity was done in conjunction with the PADEP Mining and Water Programs prior to initiation. Agricultural operations of these reclaimed mining lands continue today.

Additional "Pre-Act" lands are available within several miles of the NSP operation, as well as "Post Act" mine lands. Thus, given the continued success of the present agricultural activities for over a decade on mining lands, it is highly likely to continue in the future.

(c) Description of "compost technologies" or products to be introduced into windrows is described in Project Narrative, Section 4.2 Stage 2 – Windrow Drying on Pads 2–5 (New), paragraph 2.

(d) No additional odor controls will be utilized or are necessary on pads 2, 3, 4, 5 as the regular windrow turning and use of inoculant during cold weather season provide adequate measures to mitigate odors. Pad 6 is not utilized for unscreened compost; only new and screened wood chip bulking agent is stored on Pad 6.

(e) Nuisance Minimization Control Plan (NMCP) update will be included.

### **4) Appendix A :**

Dimensions of windrows are provided on Sheet 2 of 3, Drawing – Natural Soil Products, Gore System, Stage 1 and Stage 2, at bottom left titled "Typical Windrow".

### **5) Bonding:**

a) i) "Executive Summary" of the Project Narrative ends and the next page starts with the Title "Narrative" to more clarify the end of the Executive Summary and beginning of the Project Narrative Section.

The 137,398 cy Maximum Total Volume of all "on site materials" listed in Section 5, Project Narrative has been reduced to 122,242 cy. This is due to reduction of unscreened compost on pads 2, 3, 4, 5 by 15,156 cy and addition of 500 cy New Woodchips delivered to Building 1. Refer to "Bond Closure Narrative", Section : "Summary of Closure Materials/Volumes To Be Removed", bottom page 2.

The New Bulking Agent (new woodchips) storage on Pad 6 will be changed to 16,667 cy to reflect the volume on Drawing 3. The 16,166 cy was due to rounding.

Stage 2, Pad #3 volume was 15,889cy (a typo) has been changed due to volume reduction on Pad 3. The revised volume for Pad 3 is 11,389 cy. (Drawing 2).

ii) Bonding Worksheets – 125,722 cy (Total Volume of Materials to be Removed) has changed to 122,242 cy. This includes New Woodchips at 500 cy delivered to Building #1 (Refer to Bonding Closure Narrative Section “Summary of Closure Materials/Volumes To Be Removed”, Paragraph 2 D). The Total Volume to be Removed (122,242 cy) is listed directly below Section 2(D), bottom of Page 2.

New Woodchips will be removed by Non-Typical Farms Inc., Frank Krammes, as discussed at the April 22<sup>nd</sup> meeting.

b) As discussed at the April 22<sup>nd</sup> meeting, the volume differences are due to locations. Referring to Drawing 3, the location of 500 CY of new woodchips at Building #1 is typical for inclusion into daily incoming biosolids loads. Additional New Woodchips delivered beyond 500 CY are stored on Pad 6 for later use. New Woodchips are not typically an “off the shelf” commodity, and as such, NSP receives multiple loads on some days and none on other days. This is due to multiple factors, including weather and wood chip harvesting schedules. Therefore, it has been customary to store new woodchips in “inventory” when they are available.

c) As discussed in the April 22<sup>nd</sup> meeting, no incoming Class B biosolids are included in the Bonding Calculations, as none are stored in Building #1 or elsewhere on the site. All incoming Class B biosolids are incorporated into the Gore Bunkers by end of operational day. Form N will be corrected to reflect No Class B biosolids are stored at end of day.

d) As discussed in the April 22<sup>nd</sup> meeting, Bonding will be updated for disposal of Pad 6 runoff into Pond 6 for one year. Refer to Bonding Closure Narrative, Bonding Cost Detail, Section 2 (C).

e) As discussed in the April 22<sup>nd</sup> meeting Bonding Worksheet B, Item 11, the groundwater monitoring period is for 10 years.

#### 6.) Additional Information Regarding Revised Compost Process

a) As discussed in the April 22<sup>nd</sup> and June 11<sup>th</sup> meeting, the Gore Bunker Volume that was initially submitted was based on a standard volume design of 4 foot sidewalls and drawings supplied by the Gore System Company. A 5 foot wall option was available and provided by the Gore System Company, which was built. It was



determined that this height difference was not substantial as the bunkers are loaded by front end loaders and there are numerous "peaks and valleys" within the bunker itself.

b) As discussed in the April 22<sup>nd</sup> and June 11<sup>th</sup> meetings, the maximum volume of unscreened windows on Pads that was submitted with the initial Minor Permit Modification Application, (51,633 cy) does not reflect the daily conditions all year round, but rather a maximum volume, considered for Bonding. The number of windows and corresponding volume does fluctuate significantly from winter to summer by as much as 30+%. The drying phase is just that; a drying phase to allow the unscreened compost to become more easily "screened". In summer conditions, this happens considerably faster due to warmer temperatures and thus less time needed for drying on the Pads. This was evident at the June 11 meeting at NSP where Pads 2 and 3 were empty of unscreened compost.

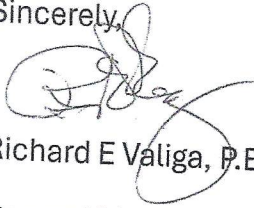
In lieu of the maximum number of windows for each Pad originally submitted, NSP has reduced the number of windows by 30.3% from the initial Minor Model Permit Modification. This maximum unscreened volume of 51,633 CY was reduced to 35,986 CY, as shown in the Narrative, Section 5. ON-SITE MATERIAL VOLUME SUMMARY, Stage 2 – Unscreened Compost – Pads and Drawing Sheet 2 of 3 – Stage Volume Estimates.

c) As discussed in the April 22<sup>nd</sup> and June 11<sup>th</sup> meetings, the quantity of stored finished compost onsite was the "maximum" quantity for Bonding (17,127 cy), but is also a small volume compared to unscreened volumes. . Additionally, the volume of stored finished compost will fluctuate over the year, due to the primary end users being agriculture and their ability to utilize the finished product at any given time. When fields are planted, some will go to storage at farm fields. When a crop has been harvested, significantly more compost will be utilized to fertilize for next crop planting. As finished compost has relatively no odor, storing up to 17,127 cy if necessary, has not contribute to offsite odors.

The comments discussed above will be incorporated into the "Project Narrative" and Bonding Narrative and Worksheets where appropriate, to clarify and/or correct any deficiencies within these documents.

Should you have additional questions regarding this response, please contact me  
either by phone (570 695 2525 – office) (917 299 6156 – cell) or via email –  
[RValiga@Tullyenvironmental.com](mailto:RValiga@Tullyenvironmental.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Valiga', with a large, stylized flourish at the end.

Richard E Valiga, P.E., BCEE

General Manager



# **GENERAL INFORMATION**



## GENERAL INFORMATION FORM – AUTHORIZATION APPLICATION

Before completing this General Information Form (GIF), read the step-by-step instructions provided in this application package. This form is used by the Department of Environmental Protection (DEP) to inform our programs regarding what other DEP permits or authorizations may be needed for the proposed project or activity. This version of the General Information Form (GIF) must be completed and returned with any program-specific application being submitted to the DEP.

|                         |                |                                               |
|-------------------------|----------------|-----------------------------------------------|
| Related ID#s (If Known) |                | DEP USE ONLY<br>Date Received & General Notes |
| Client ID# _____        | APS ID# _____  |                                               |
| Site ID# _____          | Auth ID# _____ |                                               |
| Facility ID# 101628     |                |                                               |

### CLIENT INFORMATION

|                                                                                |                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                     |
|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| DEP Client ID# _____                                                           | Client Type/Code<br>NPACO                                                                                                                                                                                                                                                                                                                                    | Dun & Bradstreet ID# _____                                                                                          |
| Legal Organization Name or Registered Fictitious Name<br>Natural Soil Products |                                                                                                                                                                                                                                                                                                                                                              | Employer ID# (EIN) 23-2708742 Is the EIN a SSN? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| State of Incorporation or Registration of Fictitious Name<br>PA                | <input type="checkbox"/> Corporation <input type="checkbox"/> LLC <input type="checkbox"/> Partnership <input type="checkbox"/> LLP <input type="checkbox"/> LP<br><input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Association/Organization<br><input type="checkbox"/> Estate/Trust <input checked="" type="checkbox"/> Other Company |                                                                                                                     |
| Individual Last Name                                                           | First Name                                                                                                                                                                                                                                                                                                                                                   | MI                                                                                                                  |
| Additional Individual Last Name                                                | First Name                                                                                                                                                                                                                                                                                                                                                   | MI                                                                                                                  |
| Mailing Address Line 1<br>2286 East Center Street                              |                                                                                                                                                                                                                                                                                                                                                              | Mailing Address Line 2<br>P.O. Box 283                                                                              |
| Address Last Line – City<br>Tremont                                            | State<br>PA                                                                                                                                                                                                                                                                                                                                                  | ZIP+4<br>17981                                                                                                      |
| Country<br>U.S.A.                                                              |                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                     |
| Client Contact Last Name<br>Valiga                                             | First Name<br>Richard                                                                                                                                                                                                                                                                                                                                        | MI<br>E                                                                                                             |
| Client Contact Title<br>General Manager                                        | Phone<br>570-695-2525                                                                                                                                                                                                                                                                                                                                        | Ext<br>-917                                                                                                         |
| Email Address<br>rvaliga@tullyenvironmental.com                                | FAX<br>570-695-2568                                                                                                                                                                                                                                                                                                                                          |                                                                                                                     |

### SITE INFORMATION

|                                                                |                                                        |                                     |       |
|----------------------------------------------------------------|--------------------------------------------------------|-------------------------------------|-------|
| DEP Site ID# _____                                             | Site Name<br>NSP                                       |                                     |       |
| EPA ID# _____                                                  | Estimated Number of Employees to be Present at Site 12 |                                     |       |
| Description of Site<br>Municipal Biosolids Composting Facility |                                                        |                                     |       |
| Tax Parcel ID(s):                                              |                                                        |                                     |       |
| County Name(s)<br>Schuylkill                                   | Municipality(ies)<br>Frailey Township                  |                                     |       |
| City                                                           | Boro                                                   | Twp                                 | State |
| <input type="checkbox"/>                                       | <input type="checkbox"/>                               | <input checked="" type="checkbox"/> | PA    |
| <input type="checkbox"/>                                       | <input type="checkbox"/>                               | <input type="checkbox"/>            |       |
| <input type="checkbox"/>                                       | <input type="checkbox"/>                               | <input type="checkbox"/>            |       |

|                                                                                                                                                                                                                                |                   |                               |                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------|--------------------------------|
| <div style="float: right; text-align: right;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div>                                                                                               |                   |                               |                                |
| <b>Site Location Line 1</b>                                                                                                                                                                                                    |                   | <b>Site Location Line 2</b>   |                                |
| 2286 East Center Street                                                                                                                                                                                                        |                   | P.O. Box 283                  |                                |
| <b>Site Location Last Line – City</b>                                                                                                                                                                                          |                   | <b>State</b>                  | <b>ZIP+4</b>                   |
| Tremont                                                                                                                                                                                                                        |                   | PA                            | 17981                          |
| <b>Detailed Written Directions to Site</b>                                                                                                                                                                                     |                   |                               |                                |
| Interstate 81 south to the Tremont exit (Exit 107) Take State Route 209 north into Tremont Borough. At the traffic light make a left and take SR 125 north for approximately 5 miles. The NSP site sits on the right of SR 125 |                   |                               |                                |
| <b>Site Contact Last Name</b>                                                                                                                                                                                                  | <b>First Name</b> | <b>MI</b>                     | <b>Suffix</b>                  |
| Valiga                                                                                                                                                                                                                         | Richard           | E                             |                                |
| <b>Site Contact Title</b>                                                                                                                                                                                                      |                   | <b>Site Contact Firm</b>      |                                |
| General Manager                                                                                                                                                                                                                |                   | Tully Environmental           |                                |
| <b>Mailing Address Line 1</b>                                                                                                                                                                                                  |                   | <b>Mailing Address Line 2</b> |                                |
| 2286 East Center Street                                                                                                                                                                                                        |                   | P.O. Box 283                  |                                |
| <b>Mailing Address Last Line – City</b>                                                                                                                                                                                        |                   | <b>State</b>                  | <b>ZIP+4</b>                   |
| Tremont                                                                                                                                                                                                                        |                   | PA                            | 17981                          |
| <b>Phone</b>                                                                                                                                                                                                                   | <b>Ext</b>        | <b>FAX</b>                    | <b>Email Address</b>           |
| 570-695-25625                                                                                                                                                                                                                  |                   | 570-695-2568                  | rvaliga@tullyenvironmental.com |
| <b>NAICS Codes</b> (Two- & Three-Digit Codes – List All That Apply)                                                                                                                                                            |                   |                               | <b>6-Digit Code</b> (Optional) |
| 562                                                                                                                                                                                                                            |                   |                               | 56221                          |
| <b>Client to Site Relationship</b>                                                                                                                                                                                             |                   |                               |                                |
| Owner                                                                                                                                                                                                                          |                   |                               |                                |

### FACILITY INFORMATION

**Modification of Existing Facility**

- |                                                                                        | Yes                      | No                       |
|----------------------------------------------------------------------------------------|--------------------------|--------------------------|
| 1. Will this project modify an existing facility, system, or activity?                 | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Will this project involve an addition to an existing facility, system, or activity? | <input type="checkbox"/> | <input type="checkbox"/> |

*If "Yes", check all relevant facility types and provide DEP facility identification numbers below.*

| Facility Type                                                     | DEP Fac ID# | Facility Type                                                                      | DEP Fac ID# |
|-------------------------------------------------------------------|-------------|------------------------------------------------------------------------------------|-------------|
| <input type="checkbox"/> Air Emission Plant                       |             | <input type="checkbox"/> Industrial Minerals Mining Operation                      |             |
| <input type="checkbox"/> Beneficial Use (water)                   |             | <input type="checkbox"/> Laboratory Location                                       |             |
| <input type="checkbox"/> Blasting Operation                       |             | <input type="checkbox"/> Land Recycling Cleanup Location                           |             |
| <input type="checkbox"/> Captive Hazardous Waste Operation        |             | <input type="checkbox"/> Mine Drainage Treatment / Land Recycling Project Location |             |
| <input type="checkbox"/> Coal Ash Beneficial Use Operation        |             | <input checked="" type="checkbox"/> Municipal Waste Operation                      | 101628      |
| <input type="checkbox"/> Coal Mining Operation                    |             | <input type="checkbox"/> Oil & Gas Encroachment Location                           |             |
| <input type="checkbox"/> Coal Pillar Location                     |             | <input type="checkbox"/> Oil & Gas Location                                        |             |
| <input type="checkbox"/> Commercial Hazardous Waste Operation     |             | <input type="checkbox"/> Oil & Gas Water Poll Control Facility                     |             |
| <input type="checkbox"/> Dam Location                             |             | <input type="checkbox"/> Public Water Supply System                                |             |
| <input type="checkbox"/> Deep Mine Safety Operation -Anthracite   |             | <input type="checkbox"/> Radiation Facility                                        |             |
| <input type="checkbox"/> Deep Mine Safety Operation -Bituminous   |             | <input type="checkbox"/> Residual Waste Operation                                  |             |
| <input type="checkbox"/> Deep Mine Safety Operation -Ind Minerals |             | <input type="checkbox"/> Storage Tank Location                                     |             |
| <input type="checkbox"/> Encroachment Location (water, wetland)   |             | <input type="checkbox"/> Water Pollution Control Facility                          |             |
| <input type="checkbox"/> Erosion & Sediment Control Facility      |             | <input type="checkbox"/> Water Resource                                            |             |
| <input type="checkbox"/> Explosive Storage Location               |             | <input type="checkbox"/> Other:                                                    |             |



| Latitude/Longitude<br>Point of Origin | Latitude |         |         | Longitude |         |         |
|---------------------------------------|----------|---------|---------|-----------|---------|---------|
|                                       | Degrees  | Minutes | Seconds | Degrees   | Minutes | Seconds |
| USGS Tremont Quad                     | 40       | 38      | 6       | 76        | 26      | 52      |

Horizontal Accuracy Measure      Feet      --or--      Meters

Horizontal Reference Datum Code      ☐      North American Datum of 1927  
☐      North American Datum of 1983  
☐      World Geodetic System of 1984

Horizontal Collection Method Code

Reference Point Code

Altitude      Feet      --or--      Meters

Altitude Datum Name      ☐      The National Geodetic Vertical Datum of 1929  
☐      The North American Vertical Datum of 1988 (NAVD88)

Altitude (Vertical) Location Datum Collection Method Code

Geometric Type Code

Data Collection Date

Source Map Scale Number      Inch(es)      =      Feet  
--or--      Centimeter(s)      =      Meters

### PROJECT INFORMATION

#### Project Name

Natural Soil Products

#### Project Description

Modification/addition to the existing approved Gore aertated static pile system to include drying/screening composted biosolids operations on existing approved Pads 2,3,4 and 5

| Project Consultant Last Name | First Name | MI | Suffix |
|------------------------------|------------|----|--------|
| Archer                       | Hugh       | V  |        |

| Project Consultant Title | Consulting Firm                    |
|--------------------------|------------------------------------|
| Principal Engineer       | Mavickar Environmental Consultants |

| Mailing Address Line 1 | Mailing Address Line 2 |
|------------------------|------------------------|
| 2000 Bonita Court      |                        |

| Address Last Line - City | State | ZIP+4      |
|--------------------------|-------|------------|
| Harrisburg               | PA    | 17110-3572 |

| Phone        | Ext | FAX | Email Address        |
|--------------|-----|-----|----------------------|
| 717-574-1618 |     |     | harcher@mavickar.com |

| Time Schedules | Project Milestone (Optional)                                      |
|----------------|-------------------------------------------------------------------|
| Immediately    | Drying & screening of compost on existing approved Pads 2,3,4 & 5 |

1. Is the project located in or within a 0.5-mile radius of an Environmental Justice community as defined by DEP? ☒ Yes ☐ No

To determine if the project is located in or within a 0.5-mile radius of an environmental justice community, please use the [online PennEnviroScreen tool](#). To see specific EJ areas, select the appropriate year of your submittal from the themes box on the right.

2. Have you informed the surrounding community prior to submitting the application to the Department? ☒ Yes ☐ No

Method of notification: Act 14 notifications

3. Have you addressed community concerns that were identified? ☒ Yes ☐ No ☐ N/A

If no, please briefly describe the community concerns that have been expressed and not addressed.

4. Is your project funded by state or federal grants? ☐ Yes ☒ No

Note: If "Yes", specify what aspect of the project is related to the grant and provide the grant source, contact person and grant expiration date.

Aspect of Project Related to Grant

Grant Source: \_\_\_\_\_

Grant Contact Person: \_\_\_\_\_

Grant Expiration Date: \_\_\_\_\_

5. Is this application for an authorization on Appendix A of the Land Use Policy? (For referenced list, see Appendix A of the Land Use Policy attached to GIF instructions) ☐ Yes ☒ No

Note: If "No" to Question 5, the application is not subject to the Land Use Policy.

If "Yes" to Question 5, the application is subject to this policy and the Applicant should answer the additional questions in the Land Use Information section.

### LAND USE INFORMATION

**Note:** Applicants should submit copies of local land use approvals or other evidence of compliance with local comprehensive plans and zoning ordinances.

1. Is there an adopted county or multi-county comprehensive plan? ☐ Yes ☐ No
2. Is there a county stormwater management plan? ☐ Yes ☐ No
3. Is there an adopted municipal or multi-municipal comprehensive plan? ☐ Yes ☐ No
4. Is there an adopted county-wide zoning ordinance, municipal zoning ordinance or joint municipal zoning ordinance? ☐ Yes ☐ No

Note: If the Applicant answers "No" to either Questions 1, 3 or 4, the provisions of the PA MPC are not applicable and the Applicant does not need to respond to questions 5 and 6 below.

If the Applicant answers "Yes" to questions 1, 3 and 4, the Applicant should respond to questions 5 and 6 below.

5. Does the proposed project meet the provisions of the zoning ordinance or does the proposed project have zoning approval? If zoning approval has been received, attach documentation. ☐ Yes ☐ No
6. Have you attached Municipal and County Land Use Letters for the project? ☐ Yes ☐ No



## COORDINATION INFORMATION

**Note:** The PA Historical and Museum Commission must be notified of proposed projects in accordance with DEP Technical Guidance Document 012-0700-001 [at PHMC's online portal, PA-SHARE](#).

**If the activity will be a mining project** (i.e., mining of coal or industrial minerals, coal refuse disposal and/or the operation of a coal or industrial minerals preparation/processing facility), respond to questions 1.0 through 2.5 below.

**If the activity will not be a mining project**, skip questions 1.0 through 2.5 and begin with question 3.0.

|     |                                                                                                                                                                                                                                                                                                                                                                                     |                              |                                        |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------|
| 1.0 | Is this a coal mining project? If "Yes", respond to 1.1-1.6. If "No", skip to Question 2.0.                                                                                                                                                                                                                                                                                         | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 1.1 | Will this coal mining project involve coal preparation/processing activities in which the total amount of coal prepared/processed will be equal to or greater than 200 tons/day?                                                                                                                                                                                                    | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 1.2 | Will this coal mining project involve coal preparation/processing activities in which the total amount of coal prepared/processed will be greater than 50,000 tons/year?                                                                                                                                                                                                            | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 1.3 | Will this coal mining project involve coal preparation/processing activities in which thermal coal dryers or pneumatic coal cleaners will be used?                                                                                                                                                                                                                                  | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 1.4 | For this coal mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?                                                                                                                                                                                                                                                 | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 1.5 | Will this coal mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet? | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 1.6 | Will this coal mining project involve underground coal mining to be conducted within 500 feet of an oil or gas well?                                                                                                                                                                                                                                                                | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2.0 | Is this a non-coal (industrial minerals) mining project? If "Yes", respond to 2.1-2.6. If "No", skip to Question 3.0.                                                                                                                                                                                                                                                               | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2.1 | Will this non-coal (industrial minerals) mining project involve the crushing and screening of non-coal minerals other than sand and gravel?                                                                                                                                                                                                                                         | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2.2 | Will this non-coal (industrial minerals) mining project involve the crushing and/or screening of sand and gravel with the exception of wet sand and gravel operations (screening only) and dry sand and gravel operations with a capacity of less than 150 tons/hour of unconsolidated materials?                                                                                   | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2.3 | Will this non-coal (industrial minerals) mining project involve the construction, operation and/or modification of a portable non-metallic (i.e., non-coal) minerals processing plant under the authority of the General Permit for Portable Non-metallic Mineral Processing Plants (i.e., BAQ-PGPA/GP-3)?                                                                          | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2.4 | For this non-coal (industrial minerals) mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?                                                                                                                                                                                                                       | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |



|       |                                                                                                                                                                                                                                                                                                                                                                                                               |                          |     |                                     |    |
|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-----|-------------------------------------|----|
| 2.5   | Will this non-coal (industrial minerals) mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet? | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |
| 3.0   | Will your project, activity, or authorization have anything to do with a well related to oil or gas production, have construction within 200 feet of, affect an oil or gas well, involve the waste from such a well, or string power lines above an oil or gas well? If "Yes", respond to 3.1-3.3. If "No", skip to Question 4.0.                                                                             | <input type="checkbox"/> | Yes | <input checked="" type="checkbox"/> | No |
| 3.1   | Does the oil- or gas-related project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water (including wetlands)?                                                                                                                                                              | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |
| 3.2   | Will the oil- or gas-related project involve discharge of industrial wastewater or stormwater to a dry swale, surface water, ground water or an existing sanitary sewer system or storm water system? If "Yes", discuss in <i>Project Description</i> .                                                                                                                                                       | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |
| 3.3   | Will the oil- or gas-related project involve the construction and operation of industrial waste treatment facilities?                                                                                                                                                                                                                                                                                         | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |
| 4.0   | Will the project involve a construction activity that results in earth disturbance? If "Yes", specify the total disturbed acreage.                                                                                                                                                                                                                                                                            | <input type="checkbox"/> | Yes | <input checked="" type="checkbox"/> | No |
| 4.0.1 | Total Disturbed Acreage                                                                                                                                                                                                                                                                                                                                                                                       |                          |     |                                     |    |
| 4.0.2 | Will the project discharge or drain to a special protection water (EV or HQ) or an EV wetland?                                                                                                                                                                                                                                                                                                                | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |
| 4.0.3 | Will the project involve a construction activity that results in earth disturbance in the area of the earth disturbance that are contaminated at levels exceeding residential or non-residential medium-specific concentrations (MSCs) in 25 Pa. Code Chapter 250 at residential or non-residential construction sites, respectively?                                                                         | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |
| 5.0   | Does the project involve any of the following: water obstruction and/or encroachment, wetland impacts, or floodplain project by the Commonwealth/political subdivision or public utility?<br>If "Yes", respond to 5.1-5.7. If "No", skip to Question 6.0.                                                                                                                                                     | <input type="checkbox"/> | Yes | <input checked="" type="checkbox"/> | No |
| 5.1   | Water Obstruction and Encroachment Projects – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water?                                                                                                                                                         | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |
| 5.2   | Wetland Impacts – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a wetland?                                                                                                                                                                                                                    | <input type="checkbox"/> | Yes | <input type="checkbox"/>            | No |

|                                         |                                                                                                                                                                                                                                                                                                                                                                         |                                         |                                        |
|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|----------------------------------------|
| 5.3                                     | Floodplain Projects by the Commonwealth, a Political Subdivision of the Commonwealth or a Public Utility – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a floodplain?                                                                                  | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            |
| 5.4                                     | Is your project an interstate transmission natural gas pipeline?                                                                                                                                                                                                                                                                                                        | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            |
| 5.5                                     | Does your project consist of linear construction activities which result in earth disturbance in two or more DEP regions AND three or more counties?                                                                                                                                                                                                                    | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            |
| 5.6                                     | Does your project utilize Floodplain Restoration as a best management practice for Post Construction Stormwater Management?                                                                                                                                                                                                                                             | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            |
| 5.7                                     | Does your project utilize Class V Gravity / Injection Wells as a best management practice for Post Construction Stormwater Management?                                                                                                                                                                                                                                  | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            |
| 6.0                                     | Will the project involve discharge of construction related stormwater to a dry swale, surface water, ground water or separate storm water system?                                                                                                                                                                                                                       | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| 6.1                                     | Will the project involve discharge of industrial waste stormwater or wastewater from an industrial activity or sewage to a dry swale, surface water, ground water or an existing sanitary sewer system or separate storm water system?                                                                                                                                  | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            |
| 7.0                                     | Will the project involve the construction and operation of industrial waste treatment facilities?                                                                                                                                                                                                                                                                       | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| 8.0                                     | Will the project involve construction of sewage treatment facilities, sanitary sewers, or sewage pumping stations? If "Yes", indicate estimated proposed flow (gal/day). Also, discuss the sanitary sewer pipe sizes and the number of pumping stations/treatment facilities/name of downstream sewage facilities in the <i>Project Description</i> , where applicable. | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| 8.0.1 Estimated Proposed Flow (gal/day) |                                                                                                                                                                                                                                                                                                                                                                         |                                         |                                        |
| 9.0                                     | Will the project involve the subdivision of land, or the generation of 800 gpd or more of sewage on an existing parcel of land or the generation of an additional 400 gpd of sewage on an already-developed parcel, or the generation of 800 gpd or more of industrial wastewater that would be discharged to an existing sanitary sewer system?                        | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| 9.0.1                                   | Was Act 537 sewage facilities planning submitted and approved by DEP? If "Yes" attach the approval letter. Approval required prior to 105/NPDES approval.                                                                                                                                                                                                               | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            |
| 10.0                                    | Is this project for the beneficial use of biosolids for land application within Pennsylvania? If "Yes" indicate how much (i.e. gallons or dry tons per year).                                                                                                                                                                                                           | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 10.0.1                                  | Gallons Per Year (residential septage)                                                                                                                                                                                                                                                                                                                                  |                                         |                                        |
| 10.0.2                                  | Dry Tons Per Year (biosolids)                                                                                                                                                                                                                                                                                                                                           | 45,561.82 Annual DryTons (2025)         |                                        |



11.0 Does the project involve construction, modification or removal of a dam? If "Yes", identify the dam. ☐ Yes ☒ No

11.0.1 Dam Name \_\_\_\_\_

12.0 Will the project interfere with the flow from, or otherwise impact, a dam? If "Yes", identify the dam. ☐ Yes ☒ No

12.0.1 Dam Name \_\_\_\_\_

13.0 Will the project involve operations (excluding during the construction period) that produce air emissions (i.e., NOX, VOC, etc.)? ☐ Yes ☒ No

13.0.1 If "Yes", is the operation subject to the agricultural exemption in 35 P.S. § 4004.1? ☐ Yes ☐ No

13.0.2 If the answer to 13.0.1 is "No", identify each type of emission followed by the estimated amount of that emission.

Enter all types & amounts of emissions; separate each set with semicolons.

14.0 Does the project include the construction or modification of a drinking water supply to serve 15 or more connections or 25 or more people, at least 60 days out of the year? If "Yes," check all proposed sub-facilities. ☐ Yes ☒ No

14.0.1 Number of Persons Served \_\_\_\_\_

14.0.2 Number of Employee/Guests \_\_\_\_\_

14.0.3 Number of Connections \_\_\_\_\_

14.0.4 Sub-Fac: Distribution System ☐ Yes ☐ No

14.0.5 Sub-Fac: Water Treatment Plant ☐ Yes ☐ No

14.0.6 Sub-Fac: Source ☐ Yes ☐ No

14.0.7 Sub-Fac: Pump Station ☐ Yes ☐ No

14.0.8 Sub-Fac: Transmission Main ☐ Yes ☐ No

14.0.9 Sub-Fac: Storage Facility ☐ Yes ☐ No

15.0 Will your project include infiltration of storm water or waste water to ground water within one-half mile of a public water supply well, spring or infiltration gallery? ☐ Yes ☐ No

16.0 Is your project to be served by an existing public water supply? If "Yes", indicate name of supplier and attach letter from supplier stating that it will serve the project. ☐ Yes ☒ No

16.0.1 Supplier's Name \_\_\_\_\_

16.0.2 Letter of Approval from Supplier is Attached ☐ Yes ☐ No

17.0 Will this project be served by on-lot drinking water wells? ☐ Yes ☒ No

18.0 Will this project involve a new or increased drinking water withdrawal from a river, stream, spring, lake, well or other water bod(ies)? If "Yes," reference Safe Drinking Water Program. ☐ Yes ☒ No

18.0.1 Source Name \_\_\_\_\_



- 19.0 Will the construction or operation of this project involve treatment, storage, reuse, or disposal of waste? If "Yes," indicate what type (i.e., hazardous, municipal (including infectious & chemotherapeutic), residual) and the amount to be treated, stored, re-used or disposed. ☒ Yes ☐ No

19.0.1 Type & Amount

Municipal Biosolids (Class B) Permitted at 350 wet tons/day

- 20.0 Will your project involve the removal of coal, minerals, contaminated media, or solid waste as part of any earth disturbance activities? ☐ Yes ☒ No

- 21.0 Does your project involve installation of a field constructed underground storage tank? If "Yes," list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit. ☐ Yes ☒ No

21.0.1 Enter all substances & capacity of each; separate each set with semicolons.

- 22.0 Does your project involve installation of an aboveground storage tank greater than 21,000 gallons capacity at an existing facility? If "Yes," list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit. ☐ Yes ☒ No

22.0.1 Enter all substances & capacity of each; separate each set with semicolons.

- 23.0 Does your project involve installation of a tank greater than 1,100 gallons which will contain a highly hazardous substance as defined in DEP's Regulated Substances List, 2570-BK-DEP2724? If "Yes," list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit. ☐ Yes ☒ No

23.0.1 Enter all substances & capacity of each; separate each set with semicolons.

- 24.0 Does your project involve installation of a storage tank at a new facility with a total AST capacity greater than 21,000 gallons? If "Yes," list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit. ☐ Yes ☒ No

24.0.1 Enter all substances & capacity of each; separate each set with semicolons.

**NOTE:** If the project includes the installation of a regulated storage tank system, including diesel emergency generator systems, the project may require the use of a Department Certified Tank Handler. For a full list of regulated storage tanks and substances, please go to [www.dep.pa.gov](http://www.dep.pa.gov) search term storage tanks

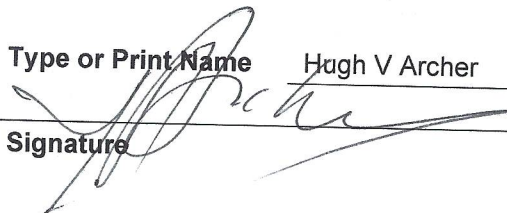
- 25.0 Will the intended activity involve the use of a radiation source? ☐ Yes ☒ No

## CERTIFICATION

I certify that I have the authority to submit this application on behalf of the applicant named herein and that the information provided in this application is true and correct to the best of my knowledge and information.

For applicants supplying an EIN number: I am applying for a permit or authorization from the Pennsylvania Department of Environmental Protection (DEP). As part of this application, I will provide DEP with an accurate EIN number for the applicant entity. By filing this application with DEP, I hereby authorize DEP to confirm the accuracy of the EIN number provided with the Pennsylvania Department of Revenue. As applicant, I further consent to the Department of Revenue discussing the same with DEP prior to issuance of the Commonwealth permit or authorization.

Type or Print Name Hugh V Archer

Signature 

Principal Engineer

Title

6/22/2026

Date



# **PROJECT NARRATIVE**

**MUNICIPAL BIOSOLIDS COMPOSTING**  
**MINOR PERMIT MODIFICATION**  
**PROJECT NARRATIVE**  
**NATURAL SOIL PRODUCTS**  
**FRAILEY TOWNSHIP, SCHUYLKILL COUNTY**

**EXECUTIVE SUMMARY**

Natural Soil Products (NSP) requests a Minor Permit Modification to the current PADEP Gore Compost Process Permit issued in January 2024, to formally incorporate additional compost drying capability essential for a screened Class A Exceptional Quality (EQ) compost. Under the existing permit, compost exiting the Gore bunkers is intended to achieve screenable moisture levels after a short drying period in Building 2. However, operational experience since January 2024 has demonstrated that seasonal weather conditions require extended drying time to achieve screenable material.

To address this operational need, NSP has implemented Stage 2 drying operations on Pads 2, 3, 4, and 5. In Stage 2, compost that has already met PFRP and VAR requirements (Stage 1) is formed into windrows and mechanically turned to accelerate drying. Windrows may then be screened either directly on the Pads or in Building 2, depending on processing needs. This modification improves moisture-control reliability and ensures screenable compost material.

The Minor Permit Modification request includes updated volume quantities for unscreened compost (Stage 1 and Stage 2), screened compost, and bulking agent storage across the site, summarized in Section 5. The proposed modification is fully reflected in updated engineering plan sheets and does not alter pathogen reduction requirements, odor control systems, or the fundamental Gore Compost Process.

NSP respectfully seeks PADEP approval of this Minor Permit Modification to ensure operational efficiency, regulatory compliance, and continued service to end users of Class A EQ compost.

## NARRATIVE

### 1. INTRODUCTION

The Minor Modification permit application is submitted in keeping with the provisions of the Pennsylvania Municipal Waste Regulations at 25 Pa Code Chapters 271 and 281 relating to Composting Facilities. Natural Soil Products (NSP) is submitting this Minor Permit Modification application in compliance with Condition 10(a) of Municipal Waste Processing Permit No. 101628, reissued to NSP in February 2017, with expiration date of April 15, 2027.

25 Pa Code Chapter 271, 271.222 requires that a permittee that plans to make a change in the municipal waste operational plan different from the plan contained in the application upon which the permit was issued shall file a complete permit modification application with the Pennsylvania Department of Environmental Protection (PADEP) prior to making any operational change.

The existing NSP municipal biosolids composting operation facility is located on approximately 106.5 acres in both Frailey and Porter Townships, Schuylkill County, Pennsylvania. The permitted site, which comprises approximately 97.5 acres, lies totally within Frailey Township.

NSP has operated a Class A Exceptional Quality (EQ) biosolids composting facility using the Sustainable Energy "Gore Cover Aerated Static Pile Compost System" (Gore Compost Process) since January 2024. The PADEP issued a minor permit modification for this operation in January 2024, modifying the previous permit, that governed the Aerated Windrow Compost Process. The Aerated Windrow Compost Process had been utilized since 1998.

This document requests Minor Permit Modification of the Gore Compost Process, to incorporate additional drying steps necessary to ensure consistent moisture reduction of compost prior to screening.

### 2. CURRENT PADEP-APPROVED GORE COMPOST PROCESS

#### 2.1 Biosolids Receiving and Mixing

- Approved dewatered biosolids are received at Building 1.
- Reused screened woodchips and new woodchips are added as bulking agent at a 4:1 bulking-agent-to-biosolids ratio.

#### 2.2 Staging and Bunker Loading

- The blended mixture is transferred to the Bunker Staging Building, then placed into the concrete Gore System bunkers.



### 2.3 Aerated Static Pile Composting

- Bunkers are covered with Gore Covers to manage odors and maintain controlled composting conditions.
- Forced Air is introduced into the Static Pile to maintain aerobic conditions within the compost pile contained within the bunker.
- Compost remains under cover until it meets PFRP and VAR requirements, producing Class A EQ compost.

### 2.4 Post-Bunker Drying and Screening

- Finished compost is moved to Building 2, where a mechanical windrow turner is used to facilitate additional drying.
- Once sufficiently dried, compost is screened to separate wood bulking agent from compost, for reuse. Screened compost is stockpiled in Building 2 and Building 3 areas.

### 2.5 Bulking Agent Production

- Local residential yard waste, wood waste, and commercial pallets are processed on Pad 6 using a tub grinder.
- Additional new purchased woodchips are stored on Pad 6.

## 3. NEED FOR MODIFICATION

The current Permitted Gore Compost Process assumed that compost removed from the Gore bunkers would achieve screenable moisture levels after only a few days of drying in Building 2. However, operational experience has demonstrated that seasonal weather conditions directly affect compost drying rates.

To ensure consistent drying, NSP has added Stage 2 drying operations on Pads 2, 3, 4, and 5.

## 4. DESCRIPTION OF THE MINOR PERMIT MODIFICATION REQUEST

### 4.1 Stage 1 – Gore System (Current)

- Compost achieving PFRP and VAR requirements is removed from the Gore bunkers.
- Defined as Finished Unscreened Compost (Stage 1).

#### 4.2 Stage 2 – Windrow Drying on Pads 2-5 (New)

- Stage 1 compost is transferred to Pads 2, 3, 4, and 5.
- Windrows are constructed and mechanically turned for extended drying. Turning of the windrows is done utilizing a Komptech Top Turn Unit, Model X67. This unit is a high capacity, self-propelled compost window turning machine designed for large scale operations. It features a heavy-duty 446 HP CAT engine and massive 5'9" diameter turning drum that can handle windrows up to 21 feet wide. NSP has used the Komptech Model X67 for over a decade. The intensive turning of the windrows breaks up any large "clumps" and affords the aeration needed to assist in drying of the windrow so they can be screened.
- At times an "inoculant" will be added to the compost in windows, which maintains an aerobic environment within the window pile. This is typically added in the colder season to amplify the aerobic conditions within the window. This provides additional odor control by degrading volatile organic compounds, if present, in the window. The microbial inoculant typically added to composting operations consists of aerobic bacteria, fungi and actinomycetes, which help to improve the quality, drying and reduce odors as they grow.
- After several weeks of drying, windows may be screened directly on the Pads and/or brought to Building 2 for screening.

#### 4.3 Plan Sheet Overview

- Sheet 1: Site layout for Stage 1 bunkers and Stage 2 areas.
- Sheet 2: Windrow layouts and volume quantities for Pads 2-5 and Building 2.
- Sheet 3: Screened compost areas/volumes and bulking agent storage on Pad 6 with volumes.

### 5. ON-SITE MATERIAL VOLUME SUMMARY

#### Unscreened Compost:

- Stage 1 – Gore Bunkers: 25,200 CY
- Stage 2 – Pad 2: 4,417 CY
  - Pad 3: 11,389 CY
  - Pad 4: 8,625 CY
  - Pad 5: 11,555 CY
- Building 2: 5,000 CY

Screened Compost:

- For Distribution: 17,167 CY

Bulking Agent:

- Building 1: 5,000 CY

- Pad 6:

Screened Bulking Agent Storage: 22,222 CY

New Bulking Agent Storage: 16,166 CY

## 6. SUMMARY OF REQUESTED MINOR PERMIT MODIFICATIONS

NSP requests PADEP approval to:

1. Transfer Stage 1 compost from the Gore bunkers to Pads 2-5 for extended drying.
2. Construct and mechanically turn windrows on the Pads.
3. Screen windrows either on the Pads or in Building 2.
4. Store screened compost in approved locations including Pads 2-5, Building 2, and Building 3.
5. Adopt updated maximum on-site material volume limits as summarized in Section 5.

## 7. CONCLUSION

The proposed Minor Permit Modification provides essential operational flexibility to manage compost moisture variability and continue producing high-quality Class A EQ compost. NSP respectfully requests PADEP approval of this Minor Permit Modification to support ongoing compliance and efficient facility operations.



# **BOND CLOSURE NARRATIVE**

# Natural Soil Products

## Bond Closure Narrative

June 2026

### **CLOSURE ASSUMPTIONS:**

1. Gore Composting Bunkers are full, as per Drawing 2
2. Unscreened & Screened Class A EQ Compost and Screened Bulking Agent & New Woodchips stored on Pads and Buildings 2 & 3 areas as per Drawings 2 & 3
3. Ponds 6 and 8 removal
4. Site Plan drawings (3) are attached that verify locations and quantities of materials to be removed

### **SUMMARY OF CLOSURE MATERIALS/VOLUMES TO BE REMOVED**

1. *Gore Composting Bunkers*: 18 bunkers@1,400 cy equals **25,200 cy**. (Drawing 2).

The bunker compost process would be operated to achieve Class A requirements. Then Class A Unscreened Compost would be removed for agriculture by Non Typical Farms currently using NSP Class A Compost fertilizer. Bunker generated leachate as well as wash water cleanup of the interior of the Gore Bunkers, is to be collected/disposed at a municipal wastewater treatment facility.

2. *Unscreened and Screened Class A EQ Compost/Bulking Agent*:

#### **A. Unscreened Compost (Drawing 2):**

##### **(a) Building 2:**

5,000 cy

##### **(b) Pads:**

2 - 4,417 cy

3 - 11,389 cy

4 - 8,625 cy  
5 - 11,555 cy  
**Total 35,986 cy**

**B. Screened Compost (Drawing 3):**

Building 2 - 2,778 cy  
Building 3 - 4,945 cy  
Pad 2 - 2,222 cy  
Pad 3 - 2,222 cy  
Pad 4 - 2,222 cy  
Pad 5 - 2,778 cy  
**Total 17,167cy**

**C. Screened Bulking Agent (Drawing 3):**

Building 1 - 4,500 cy  
Pad 6 - 22,222 cy  
**Total 26,722 cy**

**D. New Bulking Agent (woodchips) Stored/Not Used in Compost Process (Drawing 3):**

Building 1: 500 cy  
Pad 6: 16,667 cy  
**Total: 17,167 cy**

**Total Volume of Materials to Remove (1, 2A, 2B, 2C, 2D):**

25,200cy + 35,986 cy + 17,167 cy + 26,722 cy + 17,167 cy = **122,242 cy**

Site Plan Drawings (2 &3) are attached, verify locations and quantities of materials to be removed.



3. *Close Ponds 6 and 8.* The pond 6 water to be hauled off site for disposal at a WWTP. Pond 8 is a fresh water pond and is to be pumped/drained. Liners in both ponds are to be removed/disposed at landfill. Ponds to be regraded/revegetated.

## **BONDING COST DETAIL**

### **Natural Soil Products Facility Closure Costs**

#### **1. GORE BUNKERS**

(A) 18 bunkers @ 1,400 cy/bunker = **25,200 cy**

Operate the Gore Compost Process aeration system and convert all bunker compost to Class A quality.

The 25,200 cy of Class A EQ bunker compost material would be removed by "Non Typical Farms, Inc" for use as compost fertilizer on farmland, as is the current practice. Non Typical Farms would load, haul and spread the 25,200 cy of compost at \$30/ton<sup>(h)</sup> as follows:

$$\begin{aligned} 1 \text{ cy unscreened bunker compost} &= 1800 \text{ lb/cy} / 2000 \text{ lb/ton} = \\ &= 0.9 \text{ tons/cy} \\ 25,200 \text{ cy} \times 0.9 \text{ t/cy} &= \underline{22,680 \text{ tons}} \end{aligned}$$

#### **2. LEACHATE REMOVAL – GORE BUNKER TANKS AND POND 6**

(A) Remove/Disposal of Bunker Compost Leachate from 4- 4000 gallon tanks

(1) 16,000 gallons leachate/mo x 12 mo = 192,000 gallons x  
**\$0.111/gallon<sup>(g)</sup>** (Worksheet A - #8) haul/dispose at Harrisburg WWTP  
= \$21,312

(B) Wash Bunker Floor/Walls/equipment & Dispose of Wash Water.

(1) Water truck/hose<sup>(d)</sup> for 8 hours –  
wash bunkers/equipment: **\$1,760** (Worksheet A -#6) & (Worksheet A #14c)

(2) Use 1000 gallons per bunker to wash: 18,000 gallons

(C) Pond 6 Leachate Removal & Disposal at WWTP

(1) Pond 6 Capacity: 429,532 gallons\*

(2) Annual Average water runoff from Pad 6 to Pond 6 = 2,702,638  
Gallons\*\*

(3) Total Pond 6 Capacity Plus One Year Post Closure Leachate  
Removal:

$$429,532 \text{ gallons} + 2,702,638 \text{ gallons} = \underline{3,127,170 \text{ gallons}}$$

\*Pond 6 Capacity based on "Installed" Pond Volume/Gallons

\*\*Annual Average Pad 6 water runoff based on gallons

removed/disposed from Pond 6 (2015-2021 -7 year period with high  
rainfall amounts).

**(D) TOTAL BUNKER LEACHATE, WASHWATER &  
POND 6 LEACHATE REMOVED:**

$$192,000 \text{ gal} + 18,000 \text{ gal} + 3,127,170 \text{ gal} = \underline{3,337,170 \text{ gal}} \text{ (Worksheet A - \#7)}$$

$$3,337,170 \text{ gal} \times \$0.111/\text{gal}^{(g)} = \underline{\$370,426} \text{ (Worksheet A - \#14d)}$$

**3. BUILDINGS & PADS – UNSCREENED AND SCREENED  
COMPOST/BULKING AGENT AND NEW WOODCHIPS**

A. Building 2 and Pads would have Class A EQ "Unscreened" Compost  
stored as follows – (Drawing 2):

(a) Building 2 - 5,000 cy

(b) Pad 2 - 4,417 cy

(c) Pad 3 - 11,389 cy

(d) Pad 4 - 8,625 cy

(e) Pad 5 - 11,555 cy

Total 35,986 cy

B. Building 3 and Pads would have Class A EQ "Screened" Compost stored as follows – (Drawing 3):

(f) Building 2 - 2,778 cy

(g) Building 3 - 4,945 cy

(h) Pad 2 - 2,222 cy

(i) Pad 3 - 2,222 cy

(j) Pad 4 - 2,222 cy

(k) Pad 5 - 2,778 cy

Total 17,167cy

C. Screened Bulking Agent (Woodchips) Would Be Stored as Class A EQ Bulking Agent Only – (Drawing 3):

Building 1 - 4,500 cy

Pad 6 - 22,222 cy

Total 26,722 cy

D. New Woodchips Stored as Follows – (Drawing 3):

Building 1 - 4,500 cy

Pad 6 - 16,667 cy

Total 17,127 cy

**TOTAL** Bunker Unscreened Compost + Pads/Building 2 Unscreened Compost + Screened Compost + Screened Bulking Agent +New Woodchips:

25,200 cy+35,986 cy+17,167 cy+26,722 cy+17,167cy = **122,242 cy**

Of the 122,242 cy, 105,075 cy of Class A EQ compost would be removed by Non Typical Farms for use as compost fertilizer on farmland, as is the current practice. New Woodchips (17,126 cy) would also be removed and



sold by Non Typical Farms. The rate for loading, transportation and ultimate end use would be \$30/ton<sup>(h)</sup> as follows:

1. Unscreened Class A EQ “Compost”:

Unscreened compost 1,000 lb/cy = 0.5 ton/cy

$$35,986 \text{ cy} \times 0.6 \text{ ton/cy} \times \$30/\text{ton}^{(h)} = \underline{\$647,748}$$

2. Screened Class A EQ “Compost”:

Screened compost 1,200 lb/cy = 0.6 ton/cy

$$17,167 \text{ cy} \times 0.6 \text{ ton/cy} \times \$30/\text{ton}^{(h)} = \underline{\$309,006}$$

3. Screened Class A EQ “Bulking Agent”:

Screened Bulking Agent 1,000 lb/cy = 0.5 ton/cy

$$26,772 \text{ cy} \times 0.5 \text{ ton/cy} \times \$30/\text{ton}^{(h)} = \underline{\$401,580}$$

4. Bunker Unscreened Class A EQ “Compost”:

Unscreened compost 1,800 lb/cy = 0.9 ton/cy

$$25,200 \text{ cy} \times 0.9\text{t/cy} \times \$30/\text{ton} = \underline{\$680,400}$$

5. New Woodchips:

1,000 lb/cy = 0.5 ton/cy

$$17,167 \text{ cy} \times 0.5 \text{ ton/cy} \times \$30/\text{ton}^{(h)} = \underline{\$257,505}$$

**TOTAL COST TO REMOVE COMPOST/BULKING AGENT FROM BUILDINGS, PADS and BUNKER:**

$$\$647,748 + \$309,006 + \$401,580 + \$680,400 + \$257,505 = \underline{\$2,296,239} \text{ (Worksheet A - \#14a)}$$

**TOTAL "COST/CUBIC YARD" OF BUNKER COMPOST, PADS & BUILDING COMPOST/BULKING AGENT RESIDUALS AND OTHER MATERIALS TO BE REMOVED :**

\$2,296,239/122,242 cy = \$18.785/cy (Worksheet A - #3)

**4. PONDS 6, 8 CLOSURE -LINER REMOVAL/DISPOSAL**

(A) Water in ponds is rainfall runoff from previously decommissioned pad 6/pond 6 and never used for biosolids processing or compost storage, Pad 8/Pond 8.

However, for closure, all Pond 6 water will be hauled to WWTP for disposal, unless later determined that it qualifies for discharge to surface/stream due to water quality meeting such discharge requirements.

Pond 8 only collected rainfall runoff from Pad 8, which never had any biosolids or compost stored on it. Therefore, to empty pond 8, water is pumped out at the spillway and allowed to flow into the onsite surface water management system. Then both pond 6/8 liners removed and pond wall sides graded and contoured.

**(1) Pumping Water Out of Ponds**

Pond 6: 424,995 Gallons - Capacity

Pond 8: 1,927,879 Gallons - Capacity

**(2) 6" Trash Pump discharges 1500 Gallon/Minute**

**Hours to drain full pond**

Pond 6      Included in Section 2(C)\*

Pond 8      21.4

Total:      21.4 Hours

\*Pond 6 Closure Costs in Section 2(C) include removal of 1 year of Pad 6 runoff plus removal of the Total Capacity Volume of Pad 6 via collection, haul, disposal at WWTP. These costs are in Section 2(C).

**(3) Pump & Operator Rental/Week \$4,080<sup>(i)</sup>**

(B) Liner Removal Cost

(1) Pond Liner Area

|         |   |                             |
|---------|---|-----------------------------|
| ·Pond 6 | - | 6000 ft <sup>2</sup>        |
| ·Pond 8 | - | <u>21000 ft<sup>2</sup></u> |
| TOTAL   |   | 27,000 ft <sup>2</sup>      |

$$\begin{aligned} 30 \text{ Mil Liner} &= 1200 \text{ lbs}/6671 \text{ sq ft roll}^{(j)} \\ &= 0.18 \text{ lbs/sq ft} \end{aligned}$$

(1) Liner Weight:

$$\begin{aligned} 27,000 \text{ sq ft} \times 0.18 \text{ lbs/sq ft} &= 4,860 \text{ lbs} / 2,000 \text{ lbs/ton} \\ &= 2.43 \text{ tons} \end{aligned}$$

(2) LANDFILL DISPOSAL<sup>(a)</sup> COST

$$\$77.25/\text{ton} \times 2.43 \text{ ton} = \underline{\$187.71}$$

(4) HAUL<sup>(b)</sup> COST TO LANDFILL

$$\begin{aligned} 1 \text{ Trips @ } 1.5 \text{ hour RT} &= 1.5 \text{ hours} \\ \$125/\text{Hour} \times 1.5 \text{ Hours} &= \underline{\$187.5} \text{ haul to landfill} \end{aligned}$$

(5) Equipment/labor Costs for Liner Removal

$$\begin{aligned} 1 \text{ Loader}^{(c)} &- \underline{\$4,000/\text{week}^{(c)}} \\ 1 \text{ Hydraulic Excavator}^{(k)} &- \underline{\$4,750/\text{week}^{(k)}} \\ 1 \text{ Dozer}^{(l)} &- \underline{\$4,500/\text{week}^{(l)}} \\ 2 \text{ Laborer}^{(m)} &- \$59/\text{hr} \times 8 \text{ hr} \times 2 = \$944/\text{day} \\ &\times 3 \text{ days} = \underline{\$2,832} \end{aligned}$$

(6) Temporary Erosion Control for Pond Liner Removal & Site Work

$$\begin{aligned} &\text{Install 150 feet per pond of 8" erosion control sock (ECS):} \\ &(4 \text{ Ponds}) \times (150 \text{ feet ECS}) = 600 \text{ feet of ECS} \\ &600 \text{ ft (ECS)} \times \$8.85/\text{linear foot of ECS}^{(n)} = \underline{\$5,310} \end{aligned}$$



(7) Revegetation of Regraded Ponds

(a) Pond Liner Area

|          |   |                             |
|----------|---|-----------------------------|
| · Pond 6 | - | 6000 ft <sup>2</sup>        |
| · Pond 8 | - | <u>21000 ft<sup>2</sup></u> |
| TOTAL    |   | 27,000 ft <sup>2</sup>      |

(b) Revegetate all Pond Liner Areas via Hydroseeding

Hydroseeding cost per square foot: \$0.952<sup>(o)</sup>

38,000 ft<sup>2</sup> x \$0.0952/ft<sup>2</sup> = \$3,618

(8) TOTAL EQUIPMENT/LABOR COST for REMOVAL  
LINERS/REGRADE POND SIDES – 1 WEEK:

|              |                 |
|--------------|-----------------|
| · Loader     | \$4,000         |
| · Excavator  | \$4,750         |
| · Dozer      | \$4,500         |
| · 2 Laborers | <u>\$2,832</u>  |
| TOTAL        | <u>\$16,082</u> |

(C) TOTAL POND CLOSURE COSTS

|                           |                                           |
|---------------------------|-------------------------------------------|
| · Pumping Rental          | \$ 4,080                                  |
| · Liner Removal/Regrade   | \$16,082                                  |
| Haul liners to Landfill   | \$ 188                                    |
| · Landfill Disposal       | \$ 188                                    |
| Temporary Erosion Control | \$ 5,310                                  |
| Revegetate Pond Areas     | <u>\$ 3,618</u>                           |
| TOTAL                     | <u><b>\$29,466</b></u> (Worksheet D - #4) |

#### 4. ENGINEERING/QA/QC/PROJECT MANAGEMENT

Per Bonding guidelines, 5% is to be added to Total Bond Amount as follows:

1. Bonding Worksheet A – “Cost Summary” 14 a, c, d:  
 $\$2,296,239 + \$1,760 + \$370,426 = \underline{\$2,668,425}$
2.  $\$2,668,425 \times 5\% = \underline{\$133,422}$  (Worksheet A - #13)

#### 5. INFLATION CALCULATION

Inflation Rate projection for next three years based on inflation for previous three years, as per Bonding Requirements, Inflation item 6. Data taken from U S Department of Commerce, Bureau of Labor Statistics for years 2022 – 2025<sup>(p)</sup>

| <u>Year</u> | <u>Annual Inflation Rate<sup>(p)</sup></u> |
|-------------|--------------------------------------------|
| 2023        | 4.12%                                      |
| 2024        | 2.95%                                      |
| 2025        | 2.7%                                       |

$$4.12 + 2.95 + 2.7 = 9.77 / 3 = \underline{3.26\%}$$

(Worksheet D - #6)

## REFERENCES

- (a) CES Landfill Disposal Cost February 2026 - \$77.25/ton
- (b) Stadium Dirt Hauling Cost February 2026 - Tri-Axel Dump Truck - \$125/hour
- (c) Aungst Construction Cost Loader/Operator , February 2026 - \$4,000/week
- (d) Aungst Construction Cost February 2026: Water Wash Truck/Operator, - \$1,760/day
- (e) Leachate Haul Cost/gallon to Harrisburg WWTP (Capital Water) February 2026 : Litzenberger Liquid Hauling- \$0.075/gallon
- (f) Leachate Disposal Cost/Gallon at Harrisburg WWTP (Capital Water) February 2026 - \$0.036/gallon
- (g) Leachate Haul + Disposal Cost from (e) & (f):  $\$0.075/\text{gallon} + \$0.036/\text{gallon} = \mathbf{\$0.111/\text{gallon}}$
- (h) Non Typical Farms Load, Haul and Utilization of Compost – February 2026 – \$30/ton
- (i) Aungst Construction Cost February 2026: 6” Trash Pump/Operator, - \$1155/day; \$4,080/week
- (j) GeoSolutions, Inc., (GeosolutionsInc.com) 30 mil PVC Geomembrane Liner specifications, August, 2023
- (k) Aungst Construction Cost February 2026: Hydraulic Excavator/Operator - \$4,750/week
- (l) Aungst Construction Cost February 2026: Track Dozer/Operator - \$4,500/week
- (m) Aungst Construction Cost February 2026: Laborer - \$59/hour; \$472/day; \$2,360/week
- (n) Aungst Construction Cost February 2026: 8 inch erosion control sock - \$8.85/linear foot- includes labor
- (o) Aungst Construction Cost February 2026: Hydroseeding Cost per Square Foot/Labor Included:\$0.952
- (p) U S Department of Commerce, Bureau of Labor Statistics, December, 2025



# **BONDING WORKSHEETS**

# BONDING WORKSHEETS FOR COMPOSTING FACILITIES

Revised August 30, 2001

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT



## General Information

**Permits:** Please list all permits, approvals, licenses, registrations, other bonds, etc. for this facility.

[illegible]

1. List the permit I.D. number, registration number, etc. If there is no number, put in "none".
2. List the issuing authority's name, address and telephone number
3. List any closure features or monitoring requirements. As examples: For storage tanks, list the number, type and size of tanks. For NPDES permits list the number of outfalls to be monitored and ponds/plants to be maintained and/or closed.

Date Prepared COMMONWEALTH OF PENNSYLVANIA I.D. Number DEPARTMENT OF ENVIRONMENTAL PROTECTION

6-23-2026

BUREAU OF WASTE MANAGEMENT

101628

## BONDING WORKSHEET A COMPOSTING FACILITIES

**How do I start?** Select a likely "worst case" scenario where you would have a maximum amount of the facility open and in need of closure. Provide a description of the scenario with references to site development stages:

Natural Soil Products Compost Facility - Closure Assumptions:

- (1) All Gore Compost Bunkers are full.
- (2) Unscreened and Screened Class A EQ Compost & Bulking Agent Stored in Buildings and Pads are full
- (3) Ponds 2, 3, 5, 6 and 8 will be removed.

Refer to Attached Bond Closure Narrative, Bonding Cost Detail and Site Plan Sheets (3)

1. Number of acres of the facility 100.6 acres
2. Maximum volume of waste, residue, and other materials to be removed 122,242 CY
3. Unit cost to dispose of waste off-site (this should include, but not be limited to removal, transportation and disposal costs). 18.7844 \$/CY
4. Maximum amount of contaminated soils and materials to be removed and disposed of off-site 0 CY
5. Unit cost to dispose of contaminated materials (this should include but not be limited to sampling and analysis, excavation, transportation and disposal) 0 \$/CY
6. Cost to decontaminate equipment \$ 1,760 (LS)
7. Maximum amount of leachate and washwater that will be generated during closure and decontamination. 3,337,170 Gal
8. Unit cost to treat/dispose of contaminated liquids (including any transportation) 0.111 \$/gal
9. Describe sedimentation & erosion controls:  

Stormwater basin installed to handle rainfall site runoff. All composting activities are contained on pads/inside structures with leachate runoff separately collected. No special sedimentation & erosion controls are required for the operation.
10. Cost for maintaining erosion & sedimentation controls \$ 0 (LS)
11. Revegetation Cost
  - (Seeding rate used:      lbs/acre)
  - (Lime rate used:      tons/acre)
  - (Fertilizer rate used:      tons/acre)



(Mulch rate used: \_\_\_\_\_ tons/acre)

Unit cost to revegetate<sup>1</sup>

12. Cost for facility maintenance:

\$ \_\_\_\_\_ 0 \$/acre

\$ \_\_\_\_\_ 0 LS

13. Engineering and QA/QC costs

\$ \_\_\_\_\_ 133,422

LS

14. Cost Summary

a. Waste Removal (line 2 x line 3)

\$ \_\_\_\_\_ 2,296,239

b. Contaminated soils (line 4 x line 5)

\$ \_\_\_\_\_ 0

c. Equipment decontamination (line 6)

\$ \_\_\_\_\_ 1,776

d. Liquid disposal (line 7 x line 8)

\$ \_\_\_\_\_ 370,426

e. Erosion &amp; sedimentation controls (line 10)

\$ \_\_\_\_\_ 0

f. Revegetation cost (line 11 x line 1)

\$ \_\_\_\_\_ 0

g. Maintenance (line 12)

\$ \_\_\_\_\_ 0

h. QA/QC (line 13)

\$ \_\_\_\_\_ 133,422

**Total \$ \_\_\_\_\_ 2,800,087**

(Place this total on Summary Cost Worksheet – line 1)

<sup>1</sup> The unit price should include the material cost, transportation cost, handling cost and installation cost.

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## BONDING WORKSHEET B

### GROUNDWATER MONITORING SYSTEM

- |                                                                                                                    |                   |     |           |
|--------------------------------------------------------------------------------------------------------------------|-------------------|-----|-----------|
| 1. Number of wells in the approved monitoring plan. 1 well, 2 mine discharge points & 1 pond                       |                   |     |           |
| a. Shallowest well depth                                                                                           | 153               | ft. |           |
| b. Deepest well depth                                                                                              | 153               | ft. |           |
| c. Average well depth                                                                                              | 153               | ft. |           |
| d. Number with dedicated pumps                                                                                     | 0                 |     |           |
| 2. Unit cost to upgrade a well with a dedicated pump                                                               | 2,209             |     | 1 \$/well |
| 3. Unit cost to install a well (including, drilling, installation, developing and pump installation)               | 10,360            |     | 1 \$/well |
| 4. Number of wells to be installed (wells in the approved plan that haven't been installed)                        | 0                 |     |           |
| 5. Number of wells to be replaced over the life of the monitoring period (use 10% of line 1 and round up)          | 0                 |     |           |
| 6. Number of pumps to be replaced/repairs (use 25% of line 1 over the monitoring period)                           | 1                 |     |           |
| 7. Unit cost to purge and sample a well (include methane monitoring, record keeping and shipping)                  | 2,335             |     | \$/well   |
| 8. Unit cost to analyze sample(s)                                                                                  | 1,364             |     | \$/well   |
| 9. Unit cost to analyze data (includes review of lab QA/QC data, database input, form completion, and data review) | 1,557             |     | \$/well   |
| 10. Cost to purge, sample and analyze: quarterly (line 7 + line 8 + line 9)                                        | 5,256             |     | \$/well   |
| 11. Number of years of sampling (___ + time to close)                                                              | 10                |     | 10 years  |
| 12. Cost Summary –Groundwater Monitoring System                                                                    |                   |     |           |
| a. System upgrade ([line 1 – line 1d] x line 2)                                                                    | \$ 2,209          |     |           |
| b. Wells to be Installed (line 3 x line 4)                                                                         | \$ 0              |     |           |
| c. Wells to be replaced (line 3 x line 5)                                                                          | \$ 0              |     |           |
| d. Pumps to be replaced (line 2 x line 6)                                                                          | 2,209             |     |           |
| e. Cost of Quarterly Monitoring (line 1 x "4" x line 10 x line 11)                                                 | \$ 210,240        |     |           |
| <b>Subtotal</b>                                                                                                    | <b>\$ 214,658</b> |     |           |

Adjustment for resampling, assessments, etc.

- |                                                               |      |
|---------------------------------------------------------------|------|
| a. Use 0% of subtotal if no assessments in last 2 yrs.        |      |
| b. Use 5% of subtotal if assessment in last 2 yrs.            |      |
| c. Use 10% if in assessment, abatement or increase monitoring | \$ 0 |

**Total \$ 214,658**

(Place this total on Summary Cost Worksheet – line 2)

Date Prepared COMMONWEALTH OF PENNSYLVANIA I.D. Number DEPARTMENT OF ENVIRONMENTAL PROTECTION

6-23-2026

BUREAU OF WASTE MANAGEMENT

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## BONDING WORKSHEET C

### UNSATURATED ZONE MONITORING SYSTEM

1. Number of lysimeters monitored \_\_\_\_\_ Shallowest depth N/A ft.  
 Deepest depth N/A ft.  
 Average depth N/A ft.
  
2. Number of samples per year \_\_\_\_\_ #/yr/lys
  
3. Unit cost to install a lysimeter (including, drilling, installation, and developing) \_\_\_\_\_ \$/lys
  
4. Number of wells to be replaced over the life of the monitoring period (use 10% of line 1 and round up)
  
5. Unit cost to purge and sample a well (include record keeping and shipping) \_\_\_\_\_ \$/lys
  
6. Unit cost to analyze sample(s) \_\_\_\_\_ \$/lys
  
7. Unit cost to analyze data (includes review of lab QA/QC data, database input, form completion, and data review) \_\_\_\_\_ \$/lys
  
8. Cost to purge, sample and analyze (line 5 + line 6 + line 7) \_\_\_\_\_ \$/well
  
9. Number of years of sampling (\_\_\_\_ + time to close) \_\_\_\_\_ years
  
10. Cost Summary –Groundwater Monitoring System
  - a. Wells to be replaced (line 3 x line 4) \$
  - b. Cost of monitoring  
 (line 1 x line 2 x line 8 x line 9) \$
  - Subtotal** \$ 0
  
- Adjustment for resampling, assessments, etc.
  - a. Use 0% of subtotal if no assessments in last 2 yrs.
  - b. Use 5% of subtotal if assessment in last 2 yrs.
  - c. Use 10% if in assessment, abatement or increase monitoring \$
  
- Total** \$ 0

(Place this total on Summary Cost Worksheet – line 3)



Date Prepared

6-23-2026

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

I.D. Number

101628

**BONDING WORKSHEET D  
SUMMARY COST WORKSHEET**

***Cost Summary – Composting Facility***

|                                                         |                            |
|---------------------------------------------------------|----------------------------|
| 1. Decontaminating the Facility                         | \$ <u>2,800,087</u>        |
| 2. Groundwater Monitoring System                        | \$ <u>214,658</u>          |
| 3. Unsaturated Zone Monitoring                          | \$ <u>0</u>                |
| 4. Other Costs <sup>1</sup> Pond Closure – Section 4(C) | \$ <u>29,466</u>           |
| 5. Other Costs <sup>1</sup>                             | \$ <u>0</u>                |
| <b>Subtotal</b>                                         | <b>\$ <u>3,044,211</u></b> |

***Inflation***

|                                                                                                                    |                  |
|--------------------------------------------------------------------------------------------------------------------|------------------|
| 6. Inflation rate (projected inflation for the next three years based on the inflation for the prior three years). | <u>3.26</u> %    |
| 7. Inflation cost for facility (subtotal x line 6)                                                                 | \$ <u>99,242</u> |

***Contingency and administrative fees***

|                                                                                     |                   |
|-------------------------------------------------------------------------------------|-------------------|
| 8. Administrative fees (10%) (subtotal x 0.1)                                       | \$ <u>304,421</u> |
| 9. Contingency fee amount (subtotal x rate of contingency fee from Table 1) (12.5%) | \$ <u>380,527</u> |

**Total** (subtotal + line 7 + line 8 + line 9) **\$ 3,828,401**

<sup>1</sup> You should include any costs that would be incurred by the Department, but were not included in these sheets. Provide separate sheets for documentation

# **NUISANCE MANAGEMENT PLAN**

# NATURAL SOIL PRODUCTS NUISANCE MINIMIZATION AND CONTROL PLAN

***“Updated June 2026”***

## **1. INTRODUCTION**

Natural Soil Products (NSP), a biosolids composting operation, is located in Frailey and Porter Townships, Schuylkill County. NSP has developed and will utilize the procedures described in this Nuisance Minimization and Control Plan (NMCP) to assist in achieving compliance with the specific performance standards related to nuisances that are established in 25 Pa Code Chapter 281 § 281.218. This plan is intended to replace/revise the previous NMCP submitted to the Department.

The NMCP will be periodically revised and/or changed as nuisance control activities are refined and new techniques are developed or changes are necessary to maintain compliance with applicable rules and regulations. The current version of this Plan along with reports, and information/data relevant and pertinent to the NMCP, will be maintained on site for reference by site personnel and for review, as necessary, by regulatory personnel.

## **2. MANAGEMENT TEAM**

### **2.a. Overview**

NSP’s Management Team (MT) has been established to monitor the facility’s performance and to monitor conditions in nearby communities for off-site nuisance observations.

The MT has been established with a primary role of monitoring and assessing site conditions while offering a quick response capability. It also provides a more direct conduit for establishing a cooperative relationship with the neighbors of NSP by quickly addressing their concerns, problems, or questions. Routine observations by NSP management are made during regular operation hours.

Monitoring locations and frequency are determined and vary depending upon such factors as season, temperature, weather conditions, and site operational activities. MT personnel are to be trained to be aware of the relevant portions of this plan, and are equipped with two-way radios such that NSP management can be notified of any potential nuisance condition

As part of the MT approach, NSP will have staff available on a 24-hour basis to respond to MT observations and citizen complaints. The MT and on-call staff will also ensure that resources are available to accompany DEP staff within no more than 3 hrs of DEP’s request to conduct an inspection at the facility.

## 2.b. “Monitor-Respond-Assess-Monitor Loop”

The MT follows an action sequence called the “Monitor-Respond-Assess-Monitor Loop” (MRAM Loop). This sequence and function relates primarily to potential nuisances related to odors, noise and dust.

In the normal routine, a MT member is **monitoring** the performance of the facility. This physical monitoring can occur both off-site and on-site and is particularly focused on determining in real-time whether nuisance conditions exist or have the potential to exist. Monitoring at NSP can also consist of NSP management inspections and regulatory assessments.

When monitoring activities indicate that there is a condition that requires or suggests that action is needed to avoid or correct a potential nuisance condition, the MT moves into the **respond** mode. The primary response is for the MT member to immediately contact the NSP operations management, so the corrective action can be quickly identified and implemented. As a secondary response, the MT can also contact other NSP operations personnel to make operations suggestions. NSP management will then ensure that operations corrections are made either by the MT or by NSP personnel and indirection of the MT.

Upon implementation of corrective action, the MT will **assess** the affect and success of the implemented corrective action(s). The MT will continue to communicate the findings of this assessment to NSP management until the situation is properly addressed.

At this point, the MT returns to the routine **monitoring** mode.

**The NSP MT personnel point of contact, for all matters, are as follows:**

- (1) Matt Ackerly  
Regional Manager  
[631-833-8091 – cell]
- (2) Adam Koziol  
Operations Manager  
[631-245-2134 – cell]  
[570-695-2525 – office]
- (3) Jennifer Hatter  
Administrative Staff  
[917-217-4095 - cell]  
[570-695-2525 - office]



### **3. VECTORS**

#### **3.a. Vector Control Measures**

##### **Rodents**

The primary control to prevent the attraction, harborage and breeding of these potential vectors is turning of windrows to minimize the attraction of rodents. Windrow turning is to be based on the requirement to have and maintain temperatures for complete composting. If needed rodent traps are to be purchased and strategically located for proper rodent control.

If necessary, NSP would contract with licensed animal removal services to evaluate the site for additional animal control activity. The licensed animal removal service would perform any necessary control or removal measures and completes written reports.

##### **Mosquitoes**

NSP works with the Schuylkill County West Nile Virus Program Surveillance Technician Supervisor and implements the program recommendations. If appropriate, NSP would contract with a licensed contractor to evaluate the site for the breeding of the insects. The licensed contractor would execute a plan and develop reports with the results of such inspections and treatment activities. This type of program would continue until the risk of the West Nile Virus of other diseases known to be carried by mosquitoes has diminished.

The primary mosquito control program will include the elimination of all sources of standing water on NSP property during the breeding season. The program would not include any spraying to control adult mosquitoes but focuses on the breeding areas of the insects. In addition, NSP uses commercial grade lure-type fly traps, that are located throughout the site.. Trays are changed on an as-needed basis and are monitored by the MT.

#### **3.b. Vector Monitoring and Follow-up**

The licensed contractors discussed in Section 3.a. above would provide the primary monitoring and follow-up activities related to rodents and mosquitoes. These firms would periodically evaluate conditions at the NSP site and implement appropriate prevention and response activities if needed.

In addition, the MT members are on the lookout for particular problems involving vectors as they perform their routine on-site and off-site work activities.

## **4. ODORS**

### **4.a. Odor Control Measures**

The following subsections discuss NSP's current activities for reducing the potential for on-site odor generation and for minimizing or eliminating the possibility of off-site malodors.

Wind pattern around the NSP site tends to generally blow west to east. When the compost is being turned, with the compost turner, odor maybe released when fresh areas become exposed or when some incoming class B biosolids are brought in and prior to mixing with wood chips.

The MONMS system is used for odor control as needed and is a mobile odor control neutralizing misting OdorBoss system. The three forced air odor neutralizing OdorBoss systems dispenses water soluble air treatment agents using water as the delivery vehicle. The single air atomizing nozzle fractures the air stream into tiny droplets and a powerful fan into the air stream where the air treatment agents converts into a gas and attaches to odorous compounds [VOCs, sulfides, mercaptans, ammonia and amines]

To assist in locational positioning of the MONMS systems recently installed onsite weather monitoring system, which is now consistently being monitored in association with local weather predictions, is being used to make operational changes, as needed, to the composting process and where to locate/employ MONMS as maybe needed.

### **4.b. Odor Monitoring and Follow-up**

#### **Community Out-Reach**

As part of NSP's on-going community out-reach program to work with our neighbors to become a partner in the community, it is very important that if a neighbor says that they smell an odor, and the complaint can be verified or is unverified but is from a credible source, then there is a potential odor issue that must be addressed. {"Verified" and "Unverified" complaints are further defined below}. NSP's community outreach includes timely responses to local issues/complaints that maybe raised by local and county officials

Odor complaints usually begin with one or more persons that may be more sensitive to odors or may be closest to the site boundary; remembering that odor perception is subjective and qualitative.

The most common factors that cause neighbors to file odor complaints are:

- The intensity of the odor
- The duration and frequency of odorous emissions
- Lack of attempts and progress on the part of the site in mitigating odorous discharges.
- A belief that no one cares
- The negative attitude of the site concerning the issue
- Not involving the neighbors in a solution



- Other issues- such as political concerns such as adversarial groups who identify odor as a subjective issue that is difficult for composting facilities to address

The most effective initial course of action is to adopt a strong proactive program to address odor complaints. The following are elements of an effective proactive odor control program that should be considered.

- Immediately response. via an investigation and make any operational changes that maybe necessary.
- Respond to complaints by personal visit (determine if the complaint is verified or unverified); should contact be made to the NSP office.
- Avoid any and all adverse relationships.
- Establish a single point of contact and/or a center of responsibility for dealing with odor complaints (refer to the attached organizational flow chart) and establish and implement a formal odor complaint management program and complaint response system
- Build a team composed of a key operations person, the “point of contact” This has been assigned as one of the primary functions of the Operations Manager.
- Develop an aggressive program to address the potential issue. Activities under the program should include:
  - Set up meetings or attend regular municipal meetings with local authorities, complaints, and community leaders and create a reliable response system to complaints. (Complaints and authorities need to know that something is being done).
  - As necessary, enlist the help of qualified consultants and vendors who can assist your odor control efforts.
  - Document your efforts to mitigate any identified issues, consistent with DEP inspections.
  - Document what operational activates were being performed at the time the odor occurred (e.g. biosolids unloading, removal of cover materials, etc.)
  - Let the communities know, through local officials about progress or changes meant to mitigate the odor issue.
  - Set up a complaint response system for the site personnel to investigate possible complaints that are received by NSP, in conjunction with DEP complaint response inspections.

A large and rather significant problem with current odor monitoring and odor mitigation at NSP is (1) there are several potential alternative sources of odors in the general area(s) of NSP and the two closest un-incorporated villages (residential areas - Good Springs and Donaldson) and (2) odor complaints are now persistently being made directly to DEP with the complainant(s) almost always failing to understand or appreciate other potential odor sources to be investigated. NSP has now installed and are closely monitoring an air monitoring system (wind direction and intensity) which now provides better information as to whether or not NSP is the viable source of the odor complaint.

## **Setting up and managing an Odor Complaint Tracking System**

### **Complaint Sources**

Odor complaints are received in a number of ways including:

- Direct call in from complaint(s);
- Calls referred to the site from local officials such as Mayors, City Council members, Township Supervisors, County commissioners, other governmental officials, fire departments, etc.;
- Calls and letters from City, County, Regional, or State or Federal regulatory officials;
- Written reports from officials that have investigated complaints; and/or
- Written reports from assigned site personnel that investigate complaints.

### **Complaint Tracking**

Because DEP is now the primary source of odor complaints made by individual residential sources, complaint tracking, will be reliant on DEP response and odor inspections documentation.

There are numerous ways to set up and manage an odor complaint system. The goal of any system is to create a logical method of recording and maintaining a history of complaints. The system should be established to record the following basic information:

- Complainant- location of complaint
- Complainant- date of complaint
- Complainant- time of day of complaint
- Complainant- weather conditions (at time of the complaint)
- Complainant- wind direction and speed (at time of the complaint)
- Duration of odor
- Characteristic of odor (What did it smell like)
- Intensity of odor (very weak, weak, moderate, strong, very strong)
- Characteristic of wind (steady, variable, swirling)
- Any other general observations

Complaint tracking is now severely hampered by the fact that all odor complaints are now only being made to DEP

### **Verified and Unverified Complaints**

In addition to the above basic information, the complaint record should indicate the type and source of the complaint. It is helpful to distinguish the difference between a “verified” and “unverified” complaint.

- “Verified Complaints” are complaints where a second party\* (other than the complainant) identifies the location during the time of the odorous discharge and perception.



\*Note: For the purposes of this plan the definition of a second party includes any of the following:

- A NSP employee
  - A regulatory Agent
  - An official from the Township or the County
- “Unverified Complaints” are complaints from a single person

The odor complaint record system should include the type and source of complaint as:

- Single complaint call in
- Referred complaint
- Field investigated complaint

### **Complaint Analysis**

Complaint forms have been developed by NSP and are provided as attachments to this plan. The long-term goal for these forms by NSP is to utilize the information that may be gathered to analyze potential odor issues. Several formats can be utilized for this analysis, these include:

- By time of day, time of year, monthly totals
- By wind direction and intensity
- As a function of site processing activities
- Seasonal changes in weather and prevailing wind
- As a function of implementation of odor control practices

### **Investigation & Response by NSP**

Once an odor complaint is received, action should be taken as soon as possible. Unverified complaints will be treated seriously, but they should not be relied upon to justify a permanent modification to current operations or actions from regulatory agencies.

A timely response is important to maintain credibility with neighbors, customers, regulators and the community at large.

Refer to the attached forms that will be utilized by NSP to track each reported complaint (verified or unverified) that is received by the facility as part of formally implementing this plan. The following forms may be utilized:

- Complaint Investigation/Interview Form
- Verified Complaint Mitigation and Resolution Form
- Odor Complaint Follow-Up Form

As each complaint is received, it will be assigned a “tracking number” this tracking number will be a unique number assigned by NSP and utilized on each of the subsequent forms if a complaint is verified and requires additional activities on the behalf of NSP. NSP will keep an on-going

record containing all complaint forms that may be utilized at a later date to analysis potential odor issues and for review accessibility by regulatory community.

### **Mitigation by NSP**

Once a complaint is verified and potentially during the verification process, NSP will investigate the potential source of that odor and make all reasonable attempts to mitigate the odor at the source if it is determined to originate from the NSP facility. The Best Management Practices (BMP's) utilized at the facility will be reviewed and modified as necessary. This may include the use additional BMPs as deemed necessary by facility personnel. BMP's currently utilized by NSP include:

- Cover materials (finished compost)/ ground leaves and/or woodchips
- Working with NSP's customer to implement BMP's at the generators
- Working with NSP's customers to implement BMP's with the transporters

If the source of the odor is determined not to be from the NSP facility or generator/ transporter, this information should also be logged and communicated to all involved parties.

### **Follow-up and Closure by NSP**

Each verified complaint, or unverified complaint from a reliable source, investigation will see follow-up and closure by NSP. This may be an iterative process by which on-going modifications to facility operations will be tracked with complainants in order to track progress.

Typically follow up will be conducted by the Operations Manager and documented on an Odor Complaint Follow up Form, which is provided with this plan. Information garnered from this follow up will be utilized to either provide closure to that tracking number/odor complaint or to provide further insight for investigative procedures.

Follow up may be conducted in several different ways. These methods include via phone call, a meeting with DEP and/or local officials, or in letterform, as necessary. It is NSP's goal to document each incident and keep this documentation for future analysis or review.

## **5. NOISE**

### **5.a. Noise Control Measures**

Composting operations ( receipt of biosolids and mixing with bulking agent) are limited by permit to the hours between 7AM and 5PM on weekdays and Saturdays. These limited permitted hours of acceptance minimize any problematic off-site noise conditions.

Heavy equipment engine noise is primarily controlled by insuring that all equipment is operated with the required muffler systems functioning properly.

Back-up alarms are required under OSHA regulations and are necessary to insure the safety of our employee's and customers. Back-up alarms can be an additional source of noise from heavy equipment.

## **6. DUST**

### **6.a. Dust Control Measures**

Dust is generated from unpaved roads and areas that are used for composting, curing and storage, and can be prevalent during dry times of the year in the facility.

A speed limit restriction is enacted for site safety. This also has the dual effect to limit dust that is generated from improved and unpaved roads. The main truck queuing area and primary site entrance road has improved with asphalt. A water truck is available full time on site and is currently used, as necessary, to control dust along all site roads. Personnel using power sweeper brooms / shovels are also used to clean the public roads leading to and from the facility to ensure that nothing that maybe tracked out onto the public roadway remains.

During inclement weather, water trucks can also be used to control any accumulation of mud and dust from unpaved or improved parking and road surfaces.

NSP can designate "no-drive zones" during dry weather conditions. This helps to limit traffic to only those areas that can be maintained for dust control through watering and/or sealing.

### **6.b. Dust Monitoring and Follow-up**

The primary means employed by NSP for the monitoring of potential dust conditions is the "Monitor-Respond-Assess-Monitor Loop" used by the Management Team and described in Section 2.b of this Plan.

Equipment operators and maintenance personnel also continually monitor for dust problems, and communicate via radio to fellow operations personnel or management to facilitate follow-up activities.

## **7. LITTER**

### **7.a. Litter Control Measures**

Site personnel regularly inspect the roadways and windrows for litter, however since plastic bagged leaves and yard waste is no longer accepted, there is virtually no litter generated at the operation. In addition, all incoming Class B biosolids loads are unloaded inside building 1. No litter is generated from these incoming loads.



NSP will utilize the following guidelines to further control active area and unloading operations during high wind conditions, if any litter results from unloading activities.

- NSP will deploy litter pickers at those times and in the number necessary to prevent anticipated litter conditions from becoming a nuisance. Should windblown litter present a nuisance, additional measures to reduce litter will be implemented.

In general, trucks/trailers will remain tarped during unloading activities. Exceptions will be allowed under certain circumstances such as (1) special operational circumstances, such as frozen loads, snowy tarps, blockage or bridging within the trailer if the load must be untarped to unload; and (2) during safe weather conditions when winds are extremely light or nonexistent. These trucks deliver woodchips, and limbs / waste wood requiring grinding for compost mixture. Plastic or other debris is not put on these loads.

#### **7.b. Litter Monitoring and Follow-up**

All NSP personnel continually monitor the facility for litter. In particular, NSP management personnel are continuously evaluating litter conditions during operations, and are responsible for deploying the necessary labor and equipment to pick-up accumulated litter.

Additionally, the “Monitor-Respond-Assess-Monitor Loop” used by the Management Team and described in Section 2.b of this plan is utilized to evaluate and control potential nuisance conditions caused by litter.

### **8. TRAFFIC**

Traffic nuisances are minimized through a comprehensive program that combines control activities with monitoring and follow-up activities.

NSP is committed to transportation safety and proactively enforces the policies and procedures along with site-specific rules.

Some of the key initiatives currently employed through this plan are as follows:

- All long haul vehicles are required to utilize the Interstate 81 to access and exit the facility area.
- Each driver is required to stop after the tare weight is recorded and prior to exiting to conduct a walk around self-inspection of his or her vehicle such that any loose litter and debris may be removed and any rocks removed from between dual wheels before exiting the facility.
- As part of NSP’s Vehicle Inspection Program, all trucks are required to be inspected by the driver after unloading. Drivers are to look inside all open-top trailers and roll-off trucks for any loose litter or debris, which must be removed before exiting the facility.

- Overweight trucks are logged and notifications are made to the applicable driver and trucking company. As a general rule, overweight trucks are not rejected, in order to avoid such vehicles re-entering the public roadways. On the driver's first offense, he is notified in writing of the overweight condition. If the second offense occurs within 6 months of the initial infraction, the driver is penalized for one hour wait prior to unloading. On a third offense, the driver is penalized with a three hour wait. The driver is banned from NSP if there are any further offenses within one year.

Tracking Number \_\_\_\_\_

**COMPLAINT INVESTIGATION / REVIEW FORM**

Complainant Name: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Complainant Address: \_\_\_\_\_

Location of Complaint (including Direction and Distance): \_\_\_\_\_

Weather Conditions at time of complaint: \_\_\_\_\_

Wind direction and speed at time of complaint: \_\_\_\_\_

1. What time was the odor initially observed? \_\_\_\_\_
2. Describe the characteristics of the odor. What did it smell like? \_\_\_\_\_
3. Did the odor disturb or annoy you? In what way? \_\_\_\_\_
4. Do you know anyone else who was disturbed by the odor? How do you know? \_\_\_\_\_
5. Besides making a complaint, did you take any action in response to the odor? (For example, did the complainant go and/or stay indoors on a pleasant day? Shut windows? Cancel outdoor activities?) \_\_\_\_\_
6. Do you detect the odor now? If not, when did you last detect the odor? \_\_\_\_\_
7. How often do you experience the odor? \_\_\_\_\_
8. Is the odor always basically the same, or does it differ in intensity or characteristics? \_\_\_\_\_
9. How long does each odor incident typically last? \_\_\_\_\_
10. Do you know where the odor is coming from? How do you know? \_\_\_\_\_
11. How does the current odor intensity compare to the intensity when the complaint was initiated? \_\_\_\_\_



Tracking number \_\_\_\_\_

**VERIFIED COMPLAINT MITIGATION AND RESOLUTION FORM**

Verified Complaint \_\_\_\_\_

Unverified Complaint \_\_\_\_\_

1. Was the source and probably cause of the odor identified? \_\_\_\_\_ Yes \_\_\_\_\_ No

If

yes,

describe: \_\_\_\_\_

2. What Best Management Practice (BMP) recommended to the odor? (Check all that apply)

- ☐ Will this circumstance/situation exist again (e.g. continuous waste stream)?
- ☐ BMP's for transporter (e.g. tapping; truck demurrage time load sitting time?)
- ☐ BMP's for generator
- ☐ Handling hour-limitation (e.g. low wind conditions)
- ☐ Specific odor control agent applicable and available
- ☐ Verify Proper operation of existing system
- ☐ Long range capital investments control
- ☐ Restriction or elimination of the waste stream

3. Odor intensity and character after hours under #2 were implemented, describe: \_\_\_\_\_

4. Resolution or further action required? \_\_\_\_\_ Yes \_\_\_\_\_ No

If

yes,

Describe: \_\_\_\_\_

Was complainant informed and was their perception of results verified? \_\_\_\_\_ Yes \_\_\_\_\_ No

If

yes,

describe: \_\_\_\_\_

Tracking Number \_\_\_\_\_

**ODOR COMPLAINT FOLLOW UP FORM**

1. How \_\_\_\_\_ was \_\_\_\_\_ follow-up \_\_\_\_\_ conducted?  
Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
2. Who \_\_\_\_\_ conducted \_\_\_\_\_ the \_\_\_\_\_ follow-up?  
\_\_\_\_\_
3. When \_\_\_\_\_ was \_\_\_\_\_ follow-up conducted? \_\_\_\_\_
4. In what format (phone call, letter, personal visit), describe: \_\_\_\_\_  
\_\_\_\_\_
5. Results/discussion note: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
6. Further/follow action items? \_\_\_\_\_ Yes \_\_\_\_\_ No  
If \_\_\_\_\_ yes,  
describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Tracking Number \_\_\_\_\_  
**NSP COMPOST FACILITY ODOR SURVEY FORM**

Date: \_\_\_\_\_

Time of Inspection: \_\_\_\_\_

Name \_\_\_\_\_

of

Inspector: \_\_\_\_\_

Weather Conditions at Time of Inspection:

Temperature \_\_\_\_\_

Wind Intensity & Direction \_\_\_\_\_

Precipitation \_\_\_\_\_

Were there any odor observations at the facility perimeter: \_\_\_\_ Yes \_\_\_\_ No

If \_\_\_\_\_ so,  
describe: \_\_\_\_\_

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If there were any odor observations, was the source of the odor identified? If so,  
describe: \_\_\_\_\_

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# **FORM N**

## FORM N Narrative

2.

- a. All incoming biosolids are Class B from a number of wastewater treatment plants all authorized by completed Municipal Waste Form 43s. The biosolids are 18 to 25% solids and in this high moisture condition very suitable for biological composting.
- b. Composting is currently being done using the Gore direct aerated static pile composting process.
- c. Expected life of the Gore facilities is anticipated to be 60 years.
- d. The existing NSP composting facilities have existing agreements with other municipal biosolid waste processing facilities, including municipal landfills, to which biosolids waste streams can be redirected.
- e. All incoming Biosolids waste streams are Class B.
- f. NSP currently and will continue to produce a biocompost that meet all the stipulations at §271.911(b) and have contracts for almost all of the biocompost for beneficial agricultural reuse.
- g. As current agricultural reuse is ongoing with more mined out lands available for reclamation into agriculture, it is highly unlikely that this market will go away.
- h. There is no residual waste material produced by the composting process.
- i. All incoming Class B biosolids are regularly tested monthly for nutrients, PCBs and inorganic metals.
- j. Hiring and training of new employees is an ongoing process.
- k. Measurement of all incoming and outgoing materials is done by means of a regularly maintained and calibrated truck scales. Trucks are weighed going in loaded and going out empty.
- l. Operating hours are 7:00 am to 3:00 pm.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

Date Prepared/Revised  
6/20/2026

DEP USE ONLY

Date Received

## FORM N COMPOSTING FACILITIES

This form must be fully and accurately completed. All required information must be typed or legibly printed in the spaces provided. If additional space is necessary, identify each attached sheet as Form N, reference the item number and identify the date prepared. The "date prepared/revised" on any attached sheets should match the "date prepared/revised" on this page.

**General References:** Chapter 281, 295

### SECTION A. SITE IDENTIFIER

Applicant/permittee: Natural Soil Products

Site Name: Natural Soil Products

Facility ID (as issued by DEP): 101628

### SECTION B. OPERATING PLAN

1. Complete the following table:

| Type of Waste Or Other Materials To Be Composted On A Daily Basis | Maximum Weight Or Volume To Be Composted At Any One Time (Include Units) | Maximum Weight Or Volume To Be Stored At Any One Time (Include Units) | % Of Total |
|-------------------------------------------------------------------|--------------------------------------------------------------------------|-----------------------------------------------------------------------|------------|
| a. Municipal Waste Biosolids                                      | 450 tons/daily - 350 tons/max. daily average                             | No Incoming waste stored                                              | 100        |
| b.                                                                |                                                                          |                                                                       |            |
| c.                                                                |                                                                          |                                                                       |            |
| d.                                                                |                                                                          |                                                                       |            |
| e.                                                                |                                                                          |                                                                       |            |
| f.                                                                |                                                                          |                                                                       |            |
| g.                                                                |                                                                          |                                                                       |            |
| <b>TOTAL</b>                                                      |                                                                          |                                                                       |            |

Attach a completed Form U for each residual waste proposed to be composted.

Attach a complete Municipal Waste Form 43 for each sewage sludge proposed to be composted.

2. Attach a narrative which describes the following:

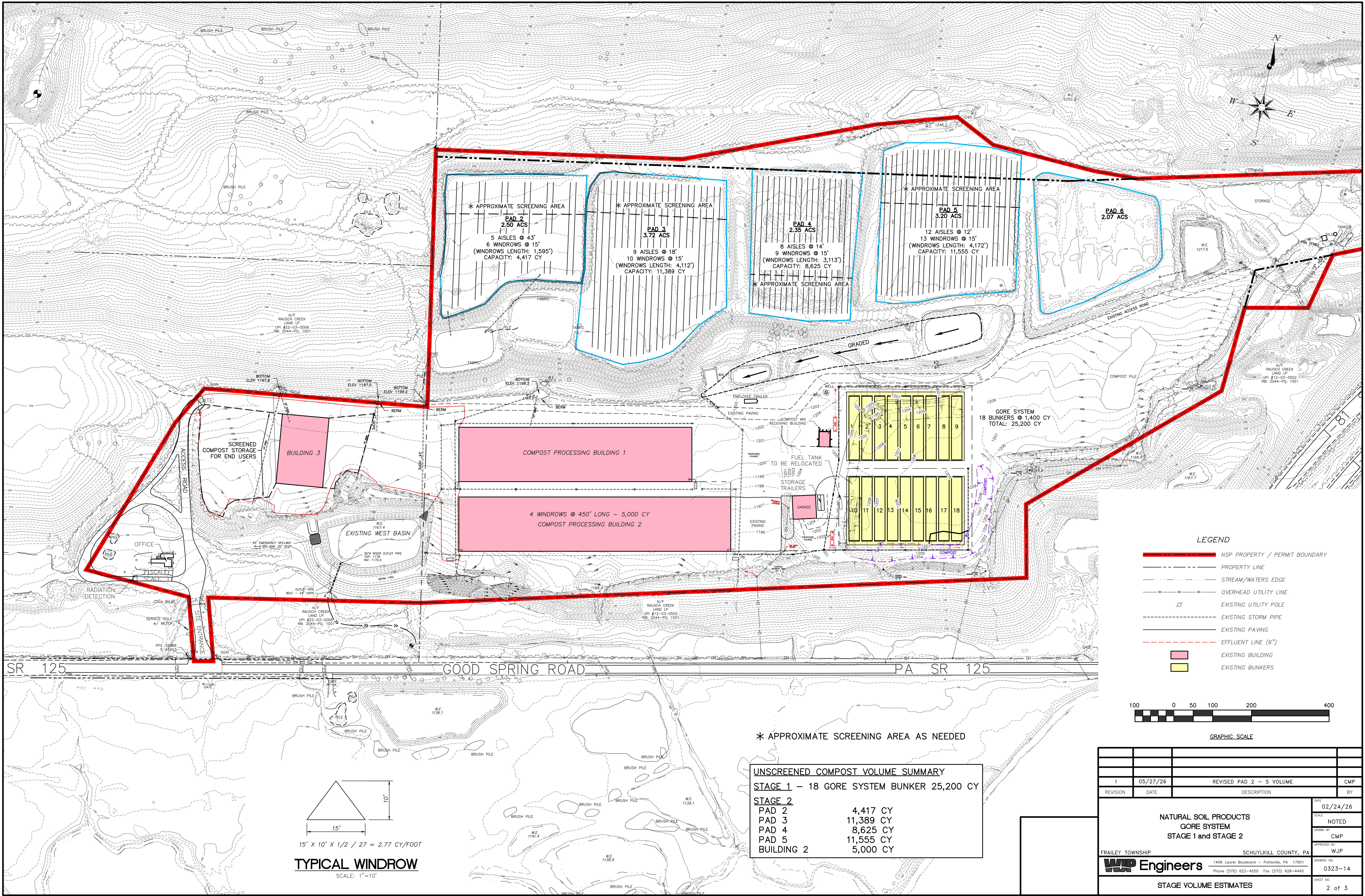
- The source and composition of each waste or other material listed above including a description of its suitability for composting.
- The compost process and the daily operation methodology to be used at the facility.
- The expected life of the facility.
- A plan for alternative waste handling or disposal during periods when the proposed facility is not in operation.

# **DRAWINGS**









LEGEND

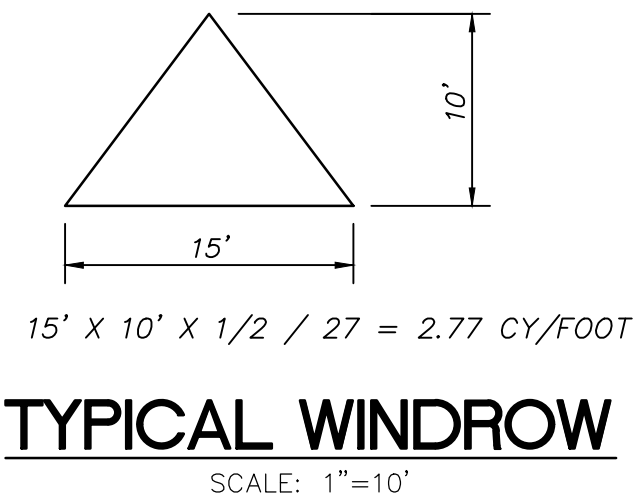
- NSP PROPERTY / PERMIT BOUNDARY
- PROPERTY LINE
- STREAM/WATERS EDGE
- OVERHEAD UTILITY LINE
- EXISTING UTILITY POLE
- EXISTING STORM PIPE
- EXISTING PAVING
- EFFLUENT LINE (6")
- EXISTING BUILDING
- EXISTING BUNKERS



GRAPHIC SCALE

\* APPROXIMATE SCREENING AREA AS NEEDED

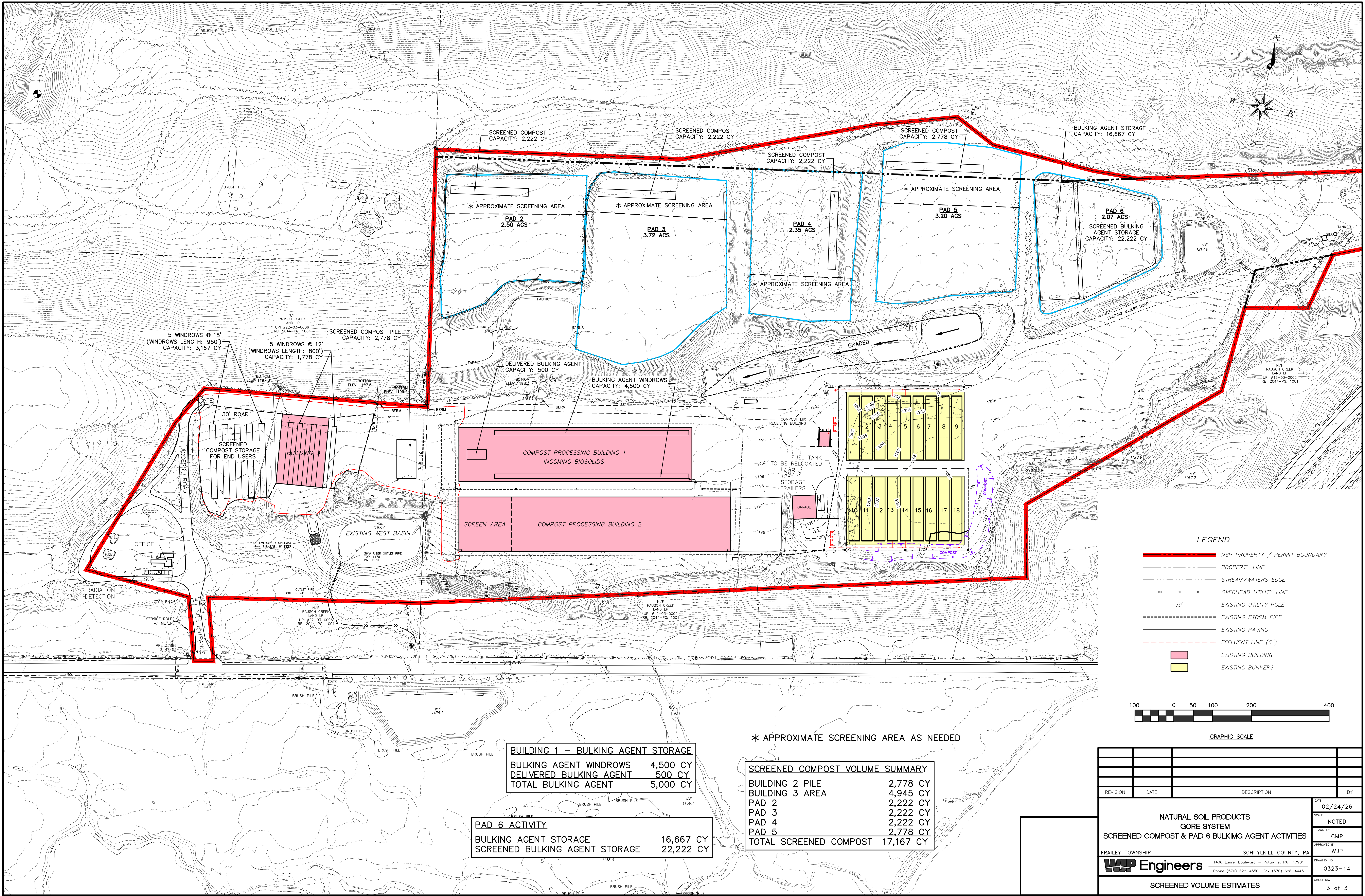
| UNSCREENED COMPOST VOLUME SUMMARY         |           |  |
|-------------------------------------------|-----------|--|
| STAGE 1 - 18 GORE SYSTEM BUNKER 25,200 CY |           |  |
| STAGE 2                                   |           |  |
| PAD 2                                     | 4,417 CY  |  |
| PAD 3                                     | 11,389 CY |  |
| PAD 4                                     | 8,625 CY  |  |
| PAD 5                                     | 11,555 CY |  |
| BUILDING 2                                | 5,000 CY  |  |



TYPICAL WINDROW  
SCALE: 1"=10'

| REVISION                                                    | DATE     | DESCRIPTION              | BY                  |
|-------------------------------------------------------------|----------|--------------------------|---------------------|
| 1                                                           | 05/27/26 | REVISED PAD 2 - 5 VOLUME | CMP                 |
| NATURAL SOIL PRODUCTS<br>GORE SYSTEM<br>STAGE 1 and STAGE 2 |          |                          |                     |
| FRAILEY TOWNSHIP                                            |          |                          | DATE 02/24/26       |
| SCHUYLKILL COUNTY, PA                                       |          |                          | SCALE NOTED         |
| WJP Engineers                                               |          |                          | DRAWN BY CMP        |
| 1406 Laurel Boulevard - Pottsville, PA 17901                |          |                          | APPROVED BY WJP     |
| Phone (570) 622-4550 Fax (570) 628-4445                     |          |                          | DRAWING NO. 0323-14 |
| STAGE VOLUME ESTIMATES                                      |          |                          | SHEET NO. 2 of 3    |





| BUILDING 1 – BULKING AGENT STORAGE |          |
|------------------------------------|----------|
| BULKING AGENT WINDROWS             | 4,500 CY |
| DELIVERED BULKING AGENT            | 500 CY   |
| TOTAL BULKING AGENT                | 5,000 CY |

| PAD 6 ACTIVITY                 |           |
|--------------------------------|-----------|
| BULKING AGENT STORAGE          | 16,667 CY |
| SCREENED BULKING AGENT STORAGE | 22,222 CY |

\* APPROXIMATE SCREENING AREA AS NEEDED

| SCREENED COMPOST VOLUME SUMMARY |           |
|---------------------------------|-----------|
| BUILDING 2 PILE                 | 2,778 CY  |
| BUILDING 3 AREA                 | 4,945 CY  |
| PAD 2                           | 2,222 CY  |
| PAD 3                           | 2,222 CY  |
| PAD 4                           | 2,222 CY  |
| PAD 5                           | 2,778 CY  |
| TOTAL SCREENED COMPOST          | 17,167 CY |

|                                                                                           |      |             |                        |
|-------------------------------------------------------------------------------------------|------|-------------|------------------------|
| REVISION                                                                                  | DATE | DESCRIPTION | BY                     |
|                                                                                           |      |             |                        |
|                                                                                           |      |             |                        |
|                                                                                           |      |             |                        |
|                                                                                           |      |             |                        |
| NATURAL SOIL PRODUCTS<br>GORE SYSTEM<br>SCREENED COMPOST & PAD 6 BULKING AGENT ACTIVITIES |      |             | DATE<br>02/24/26       |
| FRAILEY TOWNSHIP                                                                          |      |             | SCALE<br>NOTED         |
| SCHUYLKILL COUNTY, PA                                                                     |      |             | DRAWN BY<br>CMP        |
| WJP Engineers                                                                             |      |             | APPROVED BY<br>WJP     |
| 1406 Laurel Boulevard – Pottsville, PA 17901<br>Phone (570) 622-4550 Fax (570) 628-4445   |      |             | DRAWING NO.<br>0323-14 |
| SCREENED VOLUME ESTIMATES                                                                 |      |             | SHEET NO.<br>3 of 3    |