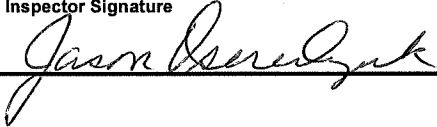


Department of Environmental Protection		GENERAL INSPECTION REPORT		Bureau of Land Recycling and Waste Management	
Type of Inspection Routine	WM Identification Number N/A	Entry Time/Date 10:00am 12/27/2022	Inspection ID		
Facility/Incident Name and Location Spring City Acres, LLC			Municipality East Coventry Township		
851 Bethel Church Road, Spring City, PA 19475			County Chester		
Name, Address of Responsible Official Nathaniel Nolt		Title Owner			
		Telephone	Interviewed Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

On December 27, 2022, I, Jason Oseredzuk, Solid Waste Supervisor, conducted a site visit at Spring City Acres, LLC, located at 851 Bethel Church Road in Spring City, PA. Carol Canigiani, Aquatic Biologist 2, and Anderson Hartzell, Office of Chief Counsel, were also present for the Department. The site visit was conducted in response to complaints received by the Department specifying concerns related to food processing residual (FPR) storage and land application activities on this and other Spring City Acres, LLC controlled properties. Present for Spring City Acres, LLC was Nathaniel Nolt, Owner, and James Clark and Robert Schena with Fox Rothschild LLP.

Mr. Clark and Mr. Nolt stated that there is no current or planned land application of FPR at any of the Spring City Acres, LLC controlled farms at this time. Mr. Nolt indicated that to date, FPR was applied only one time on one field at the 851 Bethel Church Road farm in November 2021 and included the land application of 5000 gallons of FPR as a soil amendment on field BC5. We discussed the need to ensure that prior to any land application of FPR, each site needs to be assessed for site suitability and all isolation distances listed in the FPR Management Manual (manual) should be incorporated into its plan and implemented. Mr. Nolt stated that his consultant, Bill Rogers with AET Consulting, Inc. was primarily responsible for assessing field BC5 for site suitability for FPR land application, including the consideration of appropriate isolation distances. Although Mr. Rogers was not present during the site visit, Mr. Nolt indicated that he would ask Mr. Rogers to provide additional documentation related to the November 2021 FPR application to the Department. Nutrient analysis information for this FPR application was previously provided to the Department by Mr. Rogers. We discussed that the eastern portion of field BC5 is adjacent to

Inspector Name Jason Oseredzuk	Inspector Signature 	Headquarters SERO 2 East Main Street Norristown, PA 19401	Date 02/08/2023
Person Interviewed Name Nathaniel Nolt	Signature of Person Interviewed Copy Emailed to Facility	Title Owner	Telephone 484-250-5158

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

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

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

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Facility/Incident Name and Location Spring City Acres, LLC		East Coventry Township
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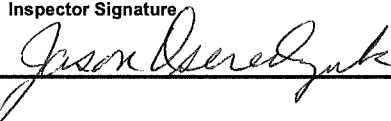
a stream and a possible wetland complex (wetlands have not been delineated at the property) and that isolation distance requirements for these features would likely apply. Carol Canigiani also indicated the soil survey maps show that hydric soils may be present in this portion of field BC5 as well. Hydric soils may indicate the presence of wetland features and may be unsuitable for FPR land application due to drainage considerations, as detailed in Chapter 8 of the manual. I offered the recommendation that visual markers be used in the future to identify any features that may be difficult to observe while applying FPR and may be subject to siting and isolation distance requirements.

Mr. Nolt also indicated that at this time, construction of the storage tank for FPR is not currently planned but may be considered in the future. Both Carol Canigiani and I stressed that the previous proposed location for the construction of the FPR storage tank appeared to be in close proximity to the stream and possible wetland complex that runs through the pasture area and that this area would need to be assessed for the presence of aquatic resources before any construction takes place. We indicated that if any future construction activities would encroach on any wetlands or streams present, permits may be required. We recommended that Mr. Nolt consider an alternative location for any future construction to avoid potential stream and wetland impacts and permitting requirements. Carol offered to conduct an initial assessment of the previously proposed FPR storage tank construction area for the presence of regulated aquatic features if that would be helpful. It was stated again that construction is not planned at this time, but that Carol would be contacted for guidance, if needed, should they decide to move forward with any such construction. We discussed that a wetland delineation is advisable to identify the extent of wetlands on the property and would be necessary if the previously proposed area will be used for any construction. Mr. Nolt was receptive to this information.

I informed Mr. Nolt that one of the complaints received involved another property at 970 Ebelhare Road in Spring City, PA and presented concerns regarding FPR land application at that property. Mr. Nolt indicated again that FPR has never been applied to this property. We discussed the need to comply with all the requirements of the manual, including site selection criteria, isolation distance requirements, and recordkeeping requirements for any future FPR land application on all properties.

On January 12, 2022, Spring City Acres, LLC provided their 2022 Crop Year Report for review. The report details the single FPR land application that took place in November 2021 on field BC5. In response to this inspection report, please provide the following additional information and/or clarifications regarding this report:

- Three (3) FPR Materials are listed on Page 8 of the report as being stored in the Overlook Storage prior to the November 2021 application. Please detail whether these materials were blended and subsequently land applied during the November 2021 application. If these sources are blended, please confirm that the FPR Average Analysis information provided on Page 7 includes an assessment of these blended sources.

Inspector Name Jason Oseredzuk	Inspector Signature 	Date 02/08/2023
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Department of Environmental Protection	GENERAL INSPECTION REPORT	Bureau of Land Recycling and Waste Management
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Facility/Incident Name and Location Spring City Acres, LLC	East Coventry Township
851 Bethel Church Road, Spring City, PA 19475	County Chester

- Page 10 Field Report indicates that FPR from the Overlook Storage was land applied in November 2021 on a portion of field BC5. The table also appears to indicate the land application of another source of material listed as Tyson for November 2021 through May 2022 on field BC5. Please describe the Tyson source identified on this table, and if this is a separate FPR source, provide the required records and details.
- Provide any accomplishments for the year including crop yields available for field BC5 if available.
- Identify the owners and/or operators for the 851 Bethel Church Road site.
- The Crop Report indicates that Lloyd Z Nolt Trucking transported and land applied the FPR from the Overlook Storage to field BC5. Please indicate who transported the FPR(s) from the time of acceptance from the generator(s) to the Overlook Storage.
- It is recommended that the facility review and revise all plans that include maps that detail areas where FPR application is restricted to accurately reflect the isolation distances provided in the manual. Maps included in the Manure Management Plan and the 2022 Crop Year Report provided following the site visit indicate that no FPR can be applied within 100 feet of any well. Table 8.11 in the manual includes the required isolation distances for agricultural utilization of FPR's and indicates a minimum isolation distance of 300 feet from individual or public water supply wells. Also, the maps for the 851 Bethel Church Road property do not include the location of any streams or possible wetlands and should be revised to include these aquatic resources and associated isolation distances where applicable.

Within ten (10) days of the receipt of this report, please provide a written response that addresses the request for additional information and/or clarifications as detailed above.

Inspector Name Jason Oseredzuk	Inspector Signature 	Date 02/08/2023
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