



April 8, 2026

Mr. Richard E. Valiga, General Manager
Natural Soil Products
2286 East Center Street
P.O. Box 283
Tremont, PA 17981
via email: rvaliga@tullyenvironmental.com

Re: Technical Deficiency Letter
Minor Permit Modification Application – additional compost drying capability
Application# 101628-A261
APS ID #1157173, AUTH ID #1560318
Frailey Township, Schuylkill County

Dear Mr. Valiga:

The Pennsylvania Department of Environmental Protection (DEP) has reviewed the submittal for Minor Permit Modification to permit application #101628-A261 and has identified deficiencies. The deficiencies are based on applicable laws, regulations, policies and this guidance sets forth DEP's preferred means of satisfying the applicable regulatory requirements.

Technical Deficiencies

1.) Form GIF

- a.) Volumes listed in the Form GIF should be verified (100,000 tpy, 350 tpd) and revised if necessary. Volume calculations vary across different documents in the application.
- b.) Please correct the Environmental Justice (EJ) section of the form. This facility has been determined by the Department to be in an EJ area.

2.) Project Narrative

The project narrative should provide more detailed information for the drying process (mechanical turning) that will occur in Phase 2. It should also provide more detailed information for the methods to be employed for odor control. (i.e. per NSP's response to Pa DEP 12/2/2025 Notice of Violation "the use of additional composting technologies that will enhance drying conditions in Phase 2, seasonally")

3.) Form N

- a.) Biosolids volumes stored onsite are not included in the site drawings or bonding calculations. This information needs to be verified and revised as necessary.

b.) Please provide a detailed justification for the following information included in the Form N narrative:

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.

c.) Please provide a detailed description of the “composting technologies” or products that will be introduced into the windrows that will “enhance drying conditions” and help minimize odors. From NSP’s response to DEP’s 12/2/2025 Notice of Violation for the permit application: *“The Permit Modification Application will also include the use of additional composting technologies that will enhance drying conditions in Phase 2, seasonally.”*

d.) Please provide what, if any, additional odor controls will be used at pads 2,3,4,5 and 6.

e.) The permittee should submit an updated Nuisance Minimization Control Plan (NMCP) to account for the changes in the permit modification.

4.) **Appendix A**

Gore System -utilization of existing pads – drawings

Provide windrow dimensions (H x W x L) to verify volumes to be stored on pads 2,3,4,5 and 6.

5.) **Bonding**

a.) Using the application drawings as a basis for site quantities (142,889 cy), the following were noted:

i.) Executive summary - 137,398 cy (stage 2 Pad #3 should be 15,889, not 15,899; does not account for 16,667 cy new bulking agent storage at Pad #6, uses incorrect amount of 16,166 cy new bulking agent storage)

ii.) Bond Worksheets - 125,722 cy (does not account for 500 cy delivered bulking agent at Bldg.#1 or 16,667 cy bulking agent storage at Pad #6)

b.) The permittee should provide a written justification for the volume differences.

c.) It also is not clear if any incoming Class B biosolids are included in the bonding calculations or what volume would be stored onsite. Form N states 70 tons maximum will be stored at anytime but there is no information in the bond worksheets or drawings accounting for it. Please provide this information.

d.) Bond Worksheets need to be updated to include pumping and disposal of “Drying Pad” leachate collection ponds for 1 year to allow time for DEP to forfeit the bond, develop a bid package, and execute a contract to remove the unscreened compost.

e.) Bond Worksheets need to be updated to include groundwater monitoring of the site for 2 years to allow time for DEP to the forfeit bond, develop a bid package, and execute a contract to remove all materials from the site.

6.) **Additional information regarding revised compost process**

a.) Provide an explanation for the difference in the quantity of compost in the Gore system now verses when the Gore Modification was submitted.

b.) Provide a justification for the quantity of unscreened compost that will be on the pads for the “windrow drying” phase. Currently NSP is estimating as much as 51,643 CY of material could be on the pads. This volume estimate appears to be based on total pad capacity rather than the minimum volume necessary to accommodate the windrow drying phase while limiting the impact this material would have on odor generation.

c.) Provide a justification of the quantity of finished compost that is estimated to be onsite. (17,167 CY).

You must submit a response fully addressing each of the technical deficiencies set forth above within 60 business days or DEP may deny the application.

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to that deficiency, you have the option of asking DEP to render a decision based on the information provided. If you choose this option, you should explain and justify how your current submission satisfies the deficiency(s).

Should you have any questions regarding the identified deficiencies, please contact me at (570) 830-3111 and refer to Application No. 101628-A621 to discuss your concerns or to schedule a meeting. You may also follow your application through the review process via *eFACTS on the Web* at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,

David F. Matcho

David F. Matcho, P.E.
Environmental Engineer Manager
Waste Management Program

cc: Hugh V. Archer, Mavickar Environmental Consultants (via email: harcher@mavickar.com)