

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, ECAD-WCB
 21st Floor, 290 Broadway, NY, NY 10007

COMPLIANCE EVALUATION INSPECTION REPORT

Program: Industrial Compliance Evaluation Inspection	Inspection Type: Compliance Evaluation Inspection	
Permittee Name: Burlington Beef	NPDES/ICIS No.: NJ0099198 (Ground Water) and NJG197670 (Terminated SW Permit)	
Inspection Entry Date: February 19, 2025 Inspection Entry Time: 11:00 AM	Inspection Exit Date: February 19, 2025 Inspection Exit Time: 1:30 PM	
Facility Inspected: Burlington Beef 30 Burlington Road Monroeville, NJ, 08343	Lat, Long: 39.620338, -75.199911 NAICS / SIC Code: 2011 (Meat Packing Plants)	
EPA Representative(s): Daniel Asselin, Environmental Engineer, EPA Region 2, ECAD-WCB, (212) 637-4262, Asselin.daniel@epa.gov		
State Representative(s): Tiffany Malcolm, NJDEP, tiffany.malcolm@dep.nj.gov Steve Mathis, NJDEP, steve.mathis@dep.nj.gov		
On-Site Facility Representative(s): Adam Kohn, General Manager, adam@burlingtonbeef.com Cynthia "Cindy" Kohn, Owner & Vice President, cindy@burlingtonbeef.com Thomas "Tommy" Patten, Office Manager, tom@burlingtonbeef.com		
Responsible Official(s): Henry Kohn, Owner & President, henry@burlingtonbeef.com Cynthia "Cindy" Kohn, Owner & Vice President, cindy@burlingtonbeef.com Thomas "Tommy" Patten, Office Manager, tom@burlingtonbeef.com		
Name and Signature of Inspector DANIEL ASSELIN <small>Digitally signed by DANIEL ASSELIN Date: 2025.03.11 11:38:12 -04'00'</small> Daniel Asselin, Environmental Engineer	Agency/Office/Phone Number ECAD-WCB (212) 637-4262	Date
Name and Signature of Management QA Reviewer MURRAY LANTNER <small>Digitally signed by MURRAY LANTNER Date: 2025.03.11 13:26:25 -04'00'</small> Murray Lantner, P.E., Acting Section Supervisor	Agency/Office/Phone Number ECAD-WCB (212) 637-3976	Date

I. INTRODUCTION

On February 19, 2025, representatives of the United States Environmental Protection Agency (“EPA”) Region 2 and the New Jersey Department of Environmental Protection (“NJDEP”) Southern Bureau conducted a Compliance Evaluation Inspection (“CEI” or “Inspection”) at Burlington Beef, located at 30 Burlington Road, Monroeville, New Jersey (the “Site” or “Facility”). The facility maintains coverage under the New Jersey Pollutant Discharge Elimination System (“NJPDES”) Discharge to Ground Water Permit NJ0099198 (“Permit”), which became effective on March 1, 2015, expired on February 29, 2020, but has been administratively extended. Discharges of wastewater from Burlington Beef are only authorized to discharge to the Site’s spray field (and underlying groundwater), provided the discharge is contained within the spray field for irrigation purposes. The NJPDES Ground Water Discharge Permit does not authorize discharges to Waters of the U.S.

Upon arrival, EPA inspector Daniel Asselin and NJDEP inspectors Tiffany Malcolm and Steve Mathis, presented their credentials to Mrs. Cynthia “Cindy” Kohn, Owner and Vice President, Mr. Thomas “Tommy” Patten, Office Manager, and Mr. Adam Kohn, General Manager. Weather conditions at the time of the inspection were cloudy and approximately 28°F with no precipitation. A brief opening conference was held to discuss the scope of the inspection with the Site representatives and afterwards, EPA conducted the Site inspection with the Site representatives.

The Site representatives stated that the Site receives cows, pigs, goats and lambs from the tristate area. The animals are slaughtered and bled within 24 hours of arrival. Animals are then put in the freezer overnight and deboned and cut the following day. Facility representatives stated that the Site has five (5) United States Department of Agriculture (“USDA”) employees onsite (approximately 2-3 of which are inspectors) who oversee the process. The Site representatives stated they receive, on average, between 75 and 90 animals/day. The Site representative stated that the unused parts (blood, guts, etc) are put in a truck and shipped to Darling Ingredients, and they fill approximately 1-2 trucks/day. Untreated wastewater from the process is discharged to the spray field and sampled quarterly. The Site representative stated that they discharge approximately 1,000 gallons of wastewater in 20 minutes to the spray field. Multiple cows and goats, which were said to be the owners’ pets are feeding and living on the spray fields.

II. FINDINGS

EPA began the inspection on the northern portion of the spray field. EPA observed mild puddling in the spray field (as shown in photograph P2190006). The Site representatives stated that there are four (4) lines of sprinklers in the spray field (with line 1 being the northernmost line and line 4 being the southernmost line), prior to discharging process wastewater to the spray field they said that they inspect the spray field for signs of puddling and if present, they discharge to a different line of sprinklers. EPA observed groundwater monitoring well 1 north of the spray field (as shown in photograph P2190009). EPA noted that PVC pipe was missing a cap and the well cover was not locked. Following the inspection, the Site representatives provided EPA with photographs of the PVC pipe capped and the cover locked. The Site representative stated that groundwater monitoring well 1 (“MW-1”) was located upgradient, north of the spray field, groundwater monitoring well 2 (“MW-2”) was located within the spray field, and groundwater monitoring well 3 (“MW-3”) was located downgradient, south of the spray field, with each being a separate well not connected in any way.

EPA also observed the western stormwater retention basin (as shown in photograph P2190008). The Site representative stated that there are two (2) retention basins onsite, one in the west and one in the east. All stormwater from the parking lots and roof gutters are channeled to one of the two retention ponds.

The inspection continued to the western edge of the spray field, along Burlington Road. EPA observed mild puddling and erosion along the western portion of the spray field (as shown in photographs P2190010 and P2190011, respectively). EPA observed an unauthorized discharge leaving the southwestern corner of the spray field. Photograph P2190034 shows the unauthorized discharge along Burlington Road, south of the Site. EPA observed MW-3, south of the spray field (as shown in photograph P2190012). The PVC pipe within MW-3 was uncapped and the well cover was unlocked, similar to MW-1.

The inspection continued to the southeastern portion of the Site. Prior to reaching the southern edge of the spray field, EPA observed a flow from the direction of the Site (as shown in photographs P2190014, P2190015, P2190020, and P2190021). The flow appeared to be red in nature, as shown in photographs P2190016, P2190017, P2190018, P2190022, P2190023, and P2190024. Additionally, EPA observed multiple signs of erosion on the southern portion of the Site (as shown in photographs P2190019 and P2190025). EPA was able to track the unauthorized discharge back to the southeastern corner of the Site's spray field. EPA observed multiple signs of frozen puddling within the spray field in the southeastern corner (as shown in photographs P2190013, P2190026, P2190027, P2190029, and P2190030). Additionally, EPA observed signs of erosion within the spray field (as shown in photographs P2190028 and P2190031) and just outside the southeastern portion of the spray field (as shown in photographs P2190032 and P2190033). EPA noted a distinct foul odor while in this portion of the Site. Additionally, EPA noted that the perimeter of the spray field was not bermed and only contained a metal fence. EPA was able to track the unauthorized discharge to an unnamed tributary of Muddy Run, which is a tributary of Maurice River, which flows to the Delaware Bay, a water of the US.

At the time of the inspection, the Site representatives discussed the possibility of regrading the spray field to increase the elevation of the edges (specifically the southeastern portion), installing a berm around the perimeter of the spray field, creating a path surrounding the spray field to allow for easy access to MW-3 and to observe all portions of the spray field, and dividing the spray field in sections to allow vegetation growth in one section at a time.

EPA continued the inspection to the eastern portion of the Site. While walking over, EPA observed a container full of animal bones and parts to the west of the main building (as shown in photograph P2190036). EPA observed evidence of forklift maintenance and dry absorbent placed on the ground in the eastern portion of the Site (as shown in photographs P2190037 and P2190044). The Site representative stated this was from a hydraulic leak in the forklift and that the floor drain is connected to an underground storage tank. EPA observed the eastern stormwater retention basin (as shown in photographs P2190041 and P2190042). EPA observed mild litter and debris within the eastern stormwater basin.

III. RECORDS REVIEWED

Following the inspection, the Site provided EPA with electronic copies of the following documents:

- 1) Spray Field Operations and Maintenance Manual (“O&M” Manual); and
- 2) Photographs of groundwater monitoring wells 1, 2 and 3 with caps on the PVC pipes and locked caps.

IV. POTENTIAL NONCOMPLIANCE ITEMS

A. Unauthorized Discharge

- a. Section 301(a) of the Clean Water Act (“CWA”), 33 U.S.C. § 1311(a), makes it unlawful for any person to discharge any pollutant from a point source to waters of the United States, except, among other things, with the authorization of, and in compliance with, a National Pollutant Discharge Elimination System (“NPDES”) permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.
- b. As discussed in the attached Notice of Violation (“NOV”) which was sent by NJDEP to Burlington Beef dated March 27, 2024, (Attachment 2), there were unpermitted discharges found on the property.
- c. As shown in the photographs provided to EPA by the Cumberland Salem Soil Conservation District (“SCD”), (Attachment 3), the red discharge can be seen downstream, in an unnamed tributary of Muddy Run, adjacent to the Burlington Beef property. This attachment includes photographs displaying a red discharge entering a stream south of the Site. These photographs were taken on March 12, 2024 and February 3, 2025.
- d. During EPA’s inspection on February 19, 2025, EPA observed multiple instances of unauthorized discharge leaving the southern portion of the spray field. As described previously in this report, the Facility discharges its process wastewater to the spray field. EPA observed an unauthorized discharge on the southwestern portion of the spray field, along Burlington Road (as shown in photograph P2190034). Additionally, EPA observed an unauthorized discharge leaving the southeastern portion of the spray field as well (as shown in photographs P2190014-P2190033), entering an unnamed tributary of Muddy Run (which is a tributary of Delaware Bay and the Atlantic Ocean, both considered Waters of the U.S.). EPA noted the discharge appeared to be red in nature. EPA observed erosion within the spray field, as shown in photographs P2190028 and P2190031.
- e. Following the inspection, EPA reviewed past aerial images of the Site online at CONNECTExplorer EagleView, (Attachment 4). The aerial images show a potential discharge leaving the southeastern portion of the Site’s spray field as far back as May 13, 2007.

- f. The Facility does not have a NPDES or NJPDES Permit that authorizes the discharge of its process wastewater to Waters of the U.S./Navigable Waters as required by Section 301 of the Clean Water Act.

B. Potential Noncompliance Items – Discharge to Ground Water Permit (NJ0099198)

- a. Part III of the Permit addresses the *Limits and Monitoring Requirements* for groundwater monitoring well 1 (“MW-1”), groundwater monitoring well 2 (“MW-2”) and groundwater monitoring well 3 (“MW-3”) in Table III – A – 1. Following the inspection, EPA reviewed the Site’s Waste Characterization Reports (“WCRs”) for the period of March 2022 through February 2025, permit exceedances are displayed below in Table 1.

Table 1: NJPDES Permit Exceedances submitted in Burlington Beef’s WCRs for the period of March 2022 through February 2025.

Postmarked Date	Outfall	Parameter Description	Statistical Base Type	WCR Value Unit	Limit Value	WCR Value
4/11/2022	MW-1	Solids, Total Dissolved (TDS)	Grab	mg/l	500	904
4/11/2022	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	900
4/11/2022	MW-3	Nitrogen, Ammonia Total (N)	Grab	mg/l	3	3.1
4/11/2022	MW-3	Sodium, Total (Na)	Grab	mg/l	50	390
4/11/2022	MW-3	Chloride (Cl)	Grab	mg/l	250	624
7/19/2022	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	652
7/19/2022	MW-2	Sodium, Total (Na)	Grab	mg/l	50	220
10/11/2022	MW-2	Sodium, Total (Na)	Grab	mg/l	50	198
10/11/2022	MW-2	Chloride (Cl)	Grab	mg/l	250	308
1/9/2023	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	716
1/9/2023	MW-2	Sodium, Total (Na)	Grab	mg/l	50	64.6
1/9/2023	MW-3	Sodium, Total (Na)	Grab	mg/l	50	89.2
4/20/2023	MW-2	Sodium, Total (Na)	Grab	mg/l	50	69.5
7/20/2023	MW-2	Nitrogen, Ammonia Total (N)	Grab	mg/l	3	10
7/20/2023	MW-2	Sodium, Total (Na)	Grab	mg/l	50	72.2
10/23/2023	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	1212
10/23/2023	MW-2	Sodium, Total (Na)	Grab	mg/l	50	410
10/23/2023	MW-2	Chloride (Cl)	Grab	mg/l	250	599
10/23/2023	MW-3	Sodium, Total (Na)	Grab	mg/l	50	76.2
1/22/2024	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	984
1/22/2024	MW-2	Sodium, Total (Na)	Grab	mg/l	50	329
1/22/2024	MW-2	Chloride (Cl)	Grab	mg/l	250	362
1/22/2024	MW-3	Sodium, Total (Na)	Grab	mg/l	50	79
4/22/2024	MW-2	Sodium, Total (Na)	Grab	mg/l	50	369
4/22/2024	MW-2	Chloride (Cl)	Grab	mg/l	250	430
7/22/2024	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	712
7/22/2024	MW-2	Sodium, Total (Na)	Grab	mg/l	50	197
7/22/2024	MW-2	Chloride (Cl)	Grab	mg/l	250	275
10/24/2024	MW-1	Solids, Total Dissolved (TDS)	Grab	mg/l	500	1056
10/24/2024	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	1052
10/24/2024	MW-2	Sodium, Total (Na)	Grab	mg/l	50	349
10/24/2024	MW-2	Chloride (Cl)	Grab	mg/l	250	400
1/23/2025	MW-2	Solids, Total Dissolved (TDS)	Grab	mg/l	500	1292
1/23/2025	MW-3	Sodium, Total (Na)	Grab	mg/l	50	67.4

- b. Part III of the Permit addresses the *Limits and Monitoring Requirements* for the Site’s discharge well (“G01G”) in Table III – B – 1. Discharge well, G01G, stores the wastewater prior to being discharged to the spray field. Following the inspection, EPA reviewed the Site’s Discharge Monitoring Reports (“DMRs”) for the period of March 2022 through February 2025, permit exceedances are displayed below in Table 2.

Table 2: NJPDES Permit Exceedances submitted in Burlington Beef’s DMRs for process wastewater during the period of March 2022 through February 2025.

Postmarked Date	Outfall	Parameter Description	Statistical Base Type	DMR Value Unit	Limit Value	WCR Value
9/22/2023	G01G	pH Minimum	Grab	SU	5	2.83

- c. Part IV.B.1.c of the Permit states that “DMRs shall be postmarked no later than the 25th day of the month following the completed monitoring period.” EPA reviewed the Site’s DMRs for the period of March 2022 through February 2025. Table 3 below, displays the DMRs postmarked after the specified timeframe required by the permit.

Table 3: Late DMR submissions for the period of March 2022 through February 2025.

Monitoring Period	Postmarked Date	Days Late
March 2023 - May 2023	6/28/2023	3
March 2024 - May 2024	7/1/2024	6
June 2024 - August 2024	9/26/2024	1

- d. Part IV.D.2.f of the Permit lists the minimum provisions required to be included in the Site’s O&M Manual. At the time of the inspection, the Site’s O&M Manual did not include the following provisions, as required by the Permit:
 - i. A list of all pollutants generated and/or discharged to all units regulated by this permit.
 - ii. Assessment of emergency situations which affect the discharge activities as outlines in N.J.A.C. 7:14A-6.12(d)3. Emergency procedures in the O&M Manual shall not create an unpermitted discharge or contravene any rules or regulations. If the discharge flows to the regulated unites without the aids of pumps, the emergency plan only needs to address equipment and emergency procedures.
 - iii. Procedures for correcting emergency situations.
 - iv. Procedures for notifying the appropriate agencies.
- e. Part IV.E.2.a.i of the Permit states that the Facility’s O&M Manual should contain a schedule of physical inspections of entire visible spray field on a weekly basis during the periods of active discharge. During the inspection the

permittee should look for areas of buildup of solids, ponding or channeling, and excessive or lack of vegetative growth. Part II of the Site's O&M Manual contains the stated requirements, however, at the time of the inspection, it was apparent to EPA that weekly visual inspections were not being taken place as multiple areas of ponding and erosion within the spray area were observed (as shown in photographs P2190013, P2190027, P2190028, P2190029, P2190030, and P2190031) and the entire spray field to be barren (as shown in photograph P2190006).

- f. Part IV.E.2.a.ii of the Permit states that the Facility's O&M Manual should contain a "schedule of tilling, growth and harvesting of vegetation to ensure appropriate cover of the spray field." At the time of the inspection, EPA observed the spray field completely barren (as shown in photograph P2190006).
- g. Part IV.E.2.c.i of the Permit states that "during the first year of the permit, the permittee is to determine the critical [wind] velocity limit above which spraying should not occur." At the time of the inspection, EPA did not observe a critical wind velocity limit within the Site's Soil Temperature and Wind Velocity logbook.
- h. Part IV.E.2.c.ii of the Permit states that when using the manual soil temperature probe, "a minimum of three locations, within the spray field at least 500 feet apart, shall be tested. Spraying shall not commence when the soil temperature is below 40 degrees Fahrenheit."
 - i. According to the Site's Soil Temperature and Wind Velocity logbook, only one (1) soil temperature is collected and the required three (3) minimum soil temperatures were not being collected.
 - ii. Following the inspection, EPA reviewed the Site's Soil Temperature and Wind Velocity logbook entries from June 14, 2024 through February 18, 2025. During this period, EPA noted three (3) instances when the Site discharged to the spray field when the ground temperature was below 40°F. Table 4 below shows the Soil Temperature and Wind Velocity data for the three (3) days.

Table 4: Discharge to Ground Water Permit violations from the Site’s Soil Temperature and Wind Velocity Logbook

Date	Anemometer Wind Velocity Min. [mph]	Anemometer Wind Velocity Max. [mph]	Air Temperature [°F]	Ground Temperature [°F]	Discharge?
2/6/2025	1	3	38	35	20 min spray
2/7/2025	1	5	38	36	20 min spray
2/14/2025	1	3	36	38	20 min spray

- i. Part IV.E.2.d of the Permit states that the permittee must maintain records of wind speed and temperature measurements and “these records must include information regarding the date, time, and location of the measurements.” EPA noted that the Site’s Soil Temperature and Wind Velocity logbook did not record the time or location the sample was taken.
- j. Part IV.E.2.f of the Permit states that “the discharge to the permitted spray fields shall not exceed the boundaries as indicated on the site plans submitted to the Department.” At the time of the inspection, EPA observed multiple areas where the Site’s wastewater discharge was exceeding the spray field’s boundary (as shown in Attachment 1) and the wastewater was flowing off-site.

V. AREAS OF CONCERN

1. The Site representatives stated that the Facility is a slaughterhouse, where cows, pigs, goats and lambs are brought in for slaughter for meat to be sold. Therefore, the Site is classified under the Standard Industrial Classification (“SIC”) Code 2011 (Meat Packing Plants). At the time of the inspection, the Site did not have coverage under the Basic Industrial Stormwater Permit (“5G2”) for Stormwater Discharges associated with Industrial Activity (NJ0088315). Industrial activity under SIC Code 2011 is a regulated SIC code, and therefore the Site may be required to be permitted under the 5G2 per Section 402(p) of the CWA and 40 CFR 122.26(b)(14). Please work with NJDEP to discuss whether or not a 5G2 Permit is required for the Facility.
2. At the time of the inspection, EPA observed absorbent spread across the eastern portion of the Site and under a forklift (as shown in photographs P2190044 and P2190037). The Site representative stated that the forklift had a hydraulic leak which was fixed. The hydraulic fluid and absorbent outside the garage have potential to enter the eastern retention pond. Please ensure that all vehicle maintenance is conducted inside and contained, and that the absorbent is cleaned up and properly disposed.

VI. CLOSING

At the conclusion of the inspection, EPA held a closing conference with the Site representatives and discussed the preliminary findings and follow-up.

ATTACHMENTS

Attachment 1 – Photographs

Attachment 2 – NJDEP Notice of Violation (“NOV”) for unpermitted discharge dated March 27, 2024

Attachment 3 – SCD Photographs from March 12, 2024 and February 3, 2025

Attachment 4 – Aerial Images of the Site

Attachment 5 – Spray Field Operations and Maintenance Manual (“O&M” Manual)

Att. 1, Unedited Photos
Burlington Beef,
Monroeville, NJ,
February 19, 2025
Taken by, Daniel Asselin
USEPA Region 2, ECAD-WCB
OM Systems TG-7 Digital Camera

Date	Time	Wind Speed	Wind Dir	Temp	Notes	GT
11/12/25	32-46	3 mph	17 mph	47°	20 min spray	41°
11/2/25	28-45	2 mph	4 mph	46°	20 min spray	40°
11/3/25	29-45	1 mph	5 mph	46°	No spray	38°
11/6/25	35-45	2 mph	7 mph	44°	No spray	35°
11/7/25	35-48	3 mph	6 mph	49°	20 min spray	40°
11/8/25	30-53	1 mph	15 mph	53°	20 min spray	43°
11/9/25	46-58	8 mph	14 mph	56°	20 min spray	45°
11/10/25	38-59	6 mph	9 mph	59°	20 min spray	43°
11/13/25	32-51	2 mph	7 mph	53°	20 min spray	40°
11/14/25	25-44	1 mph	14 mph	48°	20 min spray	40°
11/15/25	25-30	3 mph	6 mph	30°	No spray	32°
11/16/25	14-30	2 mph	6 mph	30°	No spray	32°
11/17/25	14-32	3 mph	15 mph	33°	No spray	33°
11/20/25	17-35	2 mph	15 mph	34°	No spray	33°
11/21/25	17-45	1 mph	3 mph	46°	No spray	32°
11/22/25	27-45	1 mph	2 mph	44°	No spray	33°
11/23/25	35-54	1 mph	3 mph	40°	No spray	32°
11/24/25	43-54	2 mph	15 mph	54°	20 min spray	40°
11/25/25	34-42	3 mph	15 mph	41°	20 min spray	40°
11/26/25	34-43	2 mph	5 mph	43°	20 min spray	40°
11/29/25	30-49	2 mph	6 mph	49°	20 min spray	42°
11/30/25	30-48	3 mph	15 mph	49°	20 min spray	43°
11/31/25	31-50	4 mph	7 mph	49°	20 min spray	43°

2025/02/19 11:57

P2190001 – Soil Temperature & Wind Velocity Logbook

Date	Time	Wind Speed	Wind Dir	Temp	Notes	GT
11/28/25	17-32	2/5 mph	34°		no spray	30°
11/29/25	22-34	4/4 mph	34°		no spray	33°
11/30/25	32-44	2/6 mph	39°		20 min spray	40°
12/1/25	30-38	1/3 mph	36°		20 min spray	35°
12/2/25	29-40	1/5 mph	38°		20 min spray	36°
12/3/25	25-32	1/3 mph	30°		no spray	31°
12/4/25	28-36	1/3 mph	30°		no spray	30°
12/5/25	20-28	1/3 mph	24°		no spray	32°
12/6/25	28-40	2/6 mph	30°		20 min spray	40°
12/7/25	32-39	1/3 mph	36°		20 min spray	38°
12/8/25	14-25	8/10 mph	20°		no spray	33°
12/9/25	18-30	8/10 mph	20°		no spray	32°

Date	Time	Wind Speed	Wind Dir	Temp	Notes	GT
12/10/24	39-48	1 mph	14 mph	66°	20 min spray	
12/11/24	40-69	2 mph	15 mph	68°	20 min spray	
12/12/24	42-76	1 mph	15 mph	78°	20 min spray	
12/13/24	53-82	3 mph	15 mph	90°	20 min spray	
12/14/24	57-82	4 mph	15 mph	91°	20 min spray	66
12/15/24	40-67	1 mph	7 mph	68°	20 min spray	55
12/16/24	40-76	2 mph	15 mph	75°	20 min spray	59
12/17/24	50-80	4 mph	15 mph	79°	20 min spray	64
12/18/24	61-80	3 mph	14 mph	80°	20 min spray	68
12/19/24	49-78	2 mph	7 mph	79°	20 min spray	58
12/20/24	57-94	3 mph	15 mph	82°	20 min spray	61
12/21/24	47-74	4 mph	15 mph	73°	No spray	52
12/22/24	34-59	2 mph	7 mph	59°	20 min spray	43
12/23/24	34-51	1 mph	4 mph	50°	20 min spray	44
12/24/24	34-58	2 mph	9 mph	57°	20 min spray	51
12/25/24	45-68	2 mph	15 mph	69°	20 min spray	51
12/26/24	47-60	3 mph	15 mph	60°	20 min spray	52
12/27/24	52-63	1 mph	4 mph	61°	20 min spray	57
12/28/24	47-57	3 mph	10 mph	58°	No spray	50
12/29/24	37-53	1 mph	6 mph	53°	No spray	42
12/30/24	37-57	1 mph	13 mph	54°	20 min spray	46
12/31/24	37-62	2 mph	16 mph	61°	20 min spray	51
1/1/25	37-61	1 mph	15 mph	61°	No spray	44
1/2/25	No operation					

2025/02/19 11:57

P2190002 – Soil Temperature & Wind Velocity Logbook

P25 8046RD		8546 PMS 610		560 900 PMS 610	
8/21/24	57-75	1mph/8mph/77°	20 min spray		
8/22/24	57-78	1mph/5mph/79°	20 min spray		
8/23/24	54-82	2mph/15mph/81°	20 min spray		
8/24/24	65-89	2mph/10mph/87°	20 min spray		
8/27/24	68-90	1mph/10mph/85°	20 min spray		
8/28/24	68-96	2mph/15mph/95°	20 min spray		
8/29/24	73-96	1mph/10mph/94°	20 min spray		
8/30/24	67-86	1mph/10mph/88°	20 min spray		
9/1/24	No Operation				
9/3/24	57-80	3mph/8mph/82°	20 min spray		
9/4/24	56-81	1mph/13mph/80°	20 min spray		
9/5/24	59-81	2mph/14mph/81°	20 min spray		
9/6/24	58-82	1mph/15mph/81°	20 min spray		
9/9/24	54-78	3mph/17mph/79°	20 min spray		
9/10/24	55-81	2mph/16mph/80°	20 min spray		
9/11/24	60-84	1mph/14mph/83°	20 min spray		
9/12/24	59-83	2mph/14mph/81°	20 min spray		
9/13/24	62-84	1mph/15mph/83°	20 min spray		
9/16/24	61-84	3mph/17mph/84°	20 min spray		
9/17/24	60-80	2mph/18mph/91°	20 min spray		
9/18/24	64-81	1mph/9mph/82°	No spray		
9/19/24	64-87	3mph/17mph/85°	20 min spray		
9/20/24	62-85	1mph/14mph/83°	20 min spray		
9/23/24	61-79	2mph/15mph/80°	20 min spray		

Oct 1000 PMS 610	
9/24/24	61-72 2mph/10mph/74° 20 min spray
9/25/24	62-73 1mph/18mph/71° 20 min spray
9/26/24	64-81 3mph/16mph/80° No spray
9/27/24	66-81 1mph/15mph/79° 20 min spray
9/30/24	62-75 2mph/7mph/76° 20 min spray
10/1/24	61-76 4mph/11mph/75° 20 min spray
10/2/24	61-74 1mph/15mph/73° 20 min spray
10/3/24	60-75 1mph/13mph/74° 20 min spray
10/4/24	59-77 1mph/12mph/76° 20 min spray
10/7/24	51-78 2mph/10mph/79° 20 min spray
10/8/24	53-78 2mph/10mph/78° 20 min spray
10/9/24	52-71 1mph/16mph/73° 20 min spray
10/10/24	48-70 3mph/14mph/71° 20 min spray
10/11/24	45-69 2mph/17mph/68° 20 min spray
10/14/24	54-84 4mph/12mph/85° 20 min spray
10/15/24	45-70 3mph/8mph/71° 20 min spray
10/16/24	45-60 2mph/17mph/62° 20 min spray
10/17/24	37-52 5mph/10mph/52° 20 min spray
10/18/24	42-71 3mph/16mph/70° 20 min spray
10/21/24	45-81 1mph/14mph/80° 20 min spray
10/22/24	48-84 1mph/13mph/82° 20 min spray
10/23/24	53-83 2mph/16mph/81° 20 min spray
10/24/24	53-79 2mph/17mph/78° 20 min spray
10/25/24	44-69 2mph/16mph/71° 20 min spray

P2190003 – Soil Temperature & Wind Velocity Logbook

June 8006RD	
6/14/24	64-90 2mph/14mph/88° 20 min spray
6/17/24	63-89 1mph/16mph/86° 20 min spray
6/18/24	66-91 1mph/10mph/90° 20 min spray
6/19/24	71-90 2mph/17mph/91° 20 min spray
6/20/24	71-91 3mph/17mph/91° 20 min spray
6/21/24	71-93 2mph/16mph/92° 20 min spray
6/24/24	75-98 1mph/15mph/96° 20 min spray
6/25/24	68-89 2mph/10mph/87° 20 min spray
6/26/24	68-95 1mph/15mph/93° 20 min spray
6/27/24	70-95 2mph/15mph/91° No spray
6/28/24	65-87 1mph/14mph/88° 20 min spray
7/1/24	63-90 3mph/11mph/89° No spray
7/4/24	63-86 2mph/14mph/87° 20 min spray
7/3/24	65-86 1mph/15mph/88° 20 min spray
7/4/24	No Operation
7/5/24	69-95 1mph/13mph/92° 20 min spray
7/9/24	76-95 2mph/15mph/94° 20 min spray
7/9/24	75-94 2mph/16mph/91° 20 min spray
7/10/24	75-95 1mph/13mph/94° 20 min spray
7/11/24	75-88 4mph/19mph/86° No spray
7/12/24	73-89 1mph/14mph/89° 20 min spray
7/15/24	75-97 3mph/17mph/95° No spray
7/16/24	77-98 2mph/15mph/96° 20 min spray
7/17/24	74-98 1mph/14mph/98° 20 min spray

July 8736RD	
7/18/24	74-95 2mph/7mph/94° 20 min spray
7/19/24	69-86 1mph/13mph/85° 20 min spray
7/22/24	70-88 1mph/15mph/86° 20 min spray
7/23/24	73-86 2mph/14mph/89° No spray
7/24/24	73-87 1mph/14mph/87° 20 min spray
7/25/24	74-87 2mph/17mph/88° No spray
7/26/24	68-85 3mph/15mph/84° 20 min spray
7/29/24	67-90 2mph/17mph/91° 20 min spray
7/30/24	72-87 1mph/19mph/88° 20 min spray
7/31/24	74-91 3mph/19mph/90° 20 min spray
8/1/24	74-97 1mph/14mph/95° 20 min spray
8/2/24	76-96 1mph/15mph/96° 20 min spray
8/15/24	74-94 2mph/14mph/93° 20 min spray
8/16/24	75-94 1mph/13mph/95° 20 min spray
8/17/24	69-91 4mph/17mph/90° No spray
8/18/24	68-82 2mph/16mph/84° No spray
8/19/24	68-86 5mph/11mph/86° No spray
8/12/24	66-83 1mph/15mph/82° 20 min spray
8/13/24	63-83 1mph/14mph/84° 20 min spray
8/14/24	63-87 2mph/15mph/86° 20 min spray
8/15/24	67-88 1mph/17mph/89° 20 min spray
8/16/24	68-88 2mph/14mph/88° 20 min spray
8/19/24	71-86 20 min spray
8/20/24	63-86 4mph/11mph/87° 20 min spray

P2190004 – Soil Temperature & Wind Velocity Logbook



P2190005 – Burlington Beef main building.



P2190006 – Northern portion of the spray field.



P2190007 – Owner's pets in the spray field.



P2190008 – Retention pond on the western portion of the Site.



P2190009 – Monitoring Well 1, located north of the spray field.



P2190010 – Western edge of the spray field, along Burlington Road.



P2190011 – Mild erosion along the southwestern corner of the spray field.



P2190012 – Monitoring Well 3, located south of the spray field.



P2190013 – Frozen puddles in the southeastern corner of the spray field.



P2190014 – Frozen, unauthorized discharge leaving the southeastern portion of the spray field.



P2190015 – Unauthorized discharge leaving the southeastern portion of the spray field.



P2190016 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190017 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190018 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190019 – Erosion in the southeastern portion of the Site.



P2190020 – Frozen, unauthorized discharge leaving the southeastern portion of the spray field.



P2190021 – Frozen, unauthorized discharge leaving the southeastern portion of the spray field.



P2190022 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190023 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190024 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190025 – Erosion in the southeastern portion of the Site.



P2190026 – Frozen, red, puddles in the southeastern portion of the spray field.



P2190027 – Frozen, red, puddles in the southeastern portion of the spray field.



P2190028 – Frozen, red, puddles in the southeastern portion of the spray field.



P2190029 – Frozen, red, puddles in the southeastern portion of the spray field.



P2190030 – Frozen, red, puddles in the southeastern portion of the spray field.



P2190031 – Frozen, red, puddles in the southeastern portion of the spray field.



P2190032 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190033 – Red, unauthorized discharge leaving the southeastern portion of the spray field.



P2190034 – Unauthorized discharge leaving the southwestern portion of the spray field, along Burlington Road.



P2190035 – Container full of bones on the western portion of the Site.



P2190036 – Container full of bones on the western portion of the Site.



P2190037 – Forklift maintenance and quick dry on the ground in the eastern portion of the Site.



P2190038 – Outside the maintenance area on the eastern portion of the Site.



P2190039 – Underground storage tank in the eastern portion of the Site.



P2190040 – Septic tank cover.



P2190041 – Retention pond on the eastern portion of the Site.



P2190042 – Retention pond on the eastern portion of the Site.



P2190043 – Burlington Beef.



P2190044 – Quick dry over hydraulic fluid leak.

New Jersey Department of Environmental Protection
Water Compliance and Enforcement
NOTICE OF VIOLATION

File # _____
PI # _____

Site Name: Burlington Beef Site Address: 36 Burlington Rd
Municipality: Monroeville Block: _____ Lot: _____ County: Salem Zip: 07843
Property Owner: _____ Prop. Owner's Address: _____ Phone: _____
Responsible Entity (if other than Property Owner): _____ R.E. Address: _____
R.E. City: _____ State: NJ Zip: 07843 Phone: (856) 358-2321

On 3/27 a representative from the NJDEP Water Compliance and Enforcement (W C&E) conducted an investigation into this site/matter. This **NOTICE** is issued based on facts observed by or known to the Department's representative issuing this **NOTICE**, to warn you that a violation(s) of the Statutes and Rules checked below has been found:

- New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq.
- New Jersey Safe Drinking Water Act, N.J.S.A. 58:12A-1 et seq.
- New Jersey Water Supply Management Act, N.J.S.A. 58:1A-1 et seq.
- New Jersey Water Supply and Waste Operators Licensing Act, N.J.S.A. 58:11-64 et seq.

EXPLANATION OF THIS NOTICE - Violations with citation(s) to the specific Rules issued under the above checked Statutes:

Unpermitted discharge found on the property.

- Violation above corrected at time of issuance
- See additional 1 (#) pages of **EXPLANATION OF THIS NOTICE**

PURPOSE OF THIS NOTICE - This is intended to serve as a **NOTICE** to you, to warn you of the above violations, in order to 1) provide you with an opportunity to voluntarily investigate the matter and, voluntarily take corrective action to address the identified violation(s) and 2) identify those violations, and time periods, pursuant to the Grace Period Law, N.J.S.A. 13:1D-125 et seq. where your voluntary action can prevent formal enforcement orders and penalties issued by the Department (see violations marked with an asterisk above *). This **NOTICE** does not constitute a formal enforcement order, a final agency action or a final legal determination that a violation has occurred. Therefore, this **NOTICE** may not be appealed or contested.

Neither the issuance of this **NOTICE** nor any corrective actions taken by you to address the violation(s) cited, precludes the State of New Jersey or any of its agencies from initiating future enforcement action (including issuance of a formal enforcement order and the assessment of penalties) with respect to the violations listed above or for any other violations. In the event the Department determines to pursue future formal enforcement action, you will then be provided with an opportunity to appeal or contest such action.

RESPONDING TO THIS NOTICE - Voluntary corrective actions taken in response to this **NOTICE** can affect the Department's determination on the need for or severity of any potential future enforcement action in this matter. In accordance with the Grace Period Law, the Department will not assess a penalty against you for the violations marked with an asterisk * above, if you take voluntary action to address and correct these violations at the time of issuance, or within the time periods indicated in this **NOTICE**. For violations identified in this **NOTICE** that are not subject to the Grace Period Law, the Department may consider any voluntary actions you take in response to this **NOTICE** as part of its determination 1) on whether to initiate future formal enforcement action for this site/matter and, 2) on the amount of any penalty that may be assessed in future enforcement actions. Please see items checked below regarding actions you may voluntarily undertake to address violations identified in this **NOTICE**:

CORRECTIVE ACTION PAGE(S) -The Corrective Action Page(s) outlines the timeframes pursuant to the Grace Period Law during which you may voluntarily take action to come into compliance. Depending on the nature of violations cited in this **NOTICE**, corrective action or compliance assistance recommendations for violations that are not subject to the Grace Period Law may also be outlined on this form

- Not Provided for this Notice
- See additional 1 (#) attached pages

COMPLIANCE RESPONSE FORM - Submission of a Compliance Response Form if checked below is voluntary. Completed forms should be sent to the Department contact indicated at the bottom of this **NOTICE**.

- Not Applicable
- If received within ___ days of receipt it will preserve your protection from penalty under Grace Period Law.
- If received within ___ days of receipt, it will be considered in potential future Department action regarding the violations cited

FOR QUESTIONS REGARDING THIS NOTICE, please contact the Department representative issuing this **NOTICE** at the location indicated::

<input type="checkbox"/> Southern Water Enforcement 2 Riverside Drive, Suite 201 Camden, New Jersey 08103 Telephone: (856) 614-3655 Fax: (856) 614-3608	<input type="checkbox"/> Northern Water Enforcement 7 Ridgedale Ave. Cedar Knolls, NJ 07927 Telephone: (973) 656-4099 Fax (973) 656-4400	<input checked="" type="checkbox"/> Central Water Enforcement PO Box 407 Trenton, NJ 08625-0407 Telephone: (609) 584-4200 Fax (609) 584 4220
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Issued by: Tiffany Malcolm Date: 3/27/24 Signature: [Signature]
Received by (print): _____ Date: _____ Signature (receipt only): [Signature]

NJDEP Use Only: Certified Mail Date Mailed _____ Article Number _____

New Jersey Department of Environmental Protection
Water Compliance and Enforcement

NOTICE OF VIOLATION Attachment
CORRECTIVE ACTION PAGE (1 of 1)

Site Name Burlington Reef Date 3/27/24

Corrective Action: Cease discharge and investigate

by immediately (date) OR _____ calendar day(s) from _____

Corrective Action: _____

by _____ (date) OR _____ calendar day(s) from _____

Corrective Action: _____

by _____ (date) OR _____ calendar day(s) from _____

Corrective Action: _____

by _____ (date) OR _____ calendar day(s) from _____

Additional recommendations or compliance assistance information:

Additional Resources

Water Compliance and Enforcement <http://www.nj.gov/dep/enforcement>

For UST Registration and Billing Questions: <http://www.nj.gov/dep/srp/bust/>

Division of Water Supply - <http://www.state.nj.us/dep/watersupply/> - Phone 609-292-5550

For Permitting Questions: Division of Water Quality - www.nj.gov/dep/dwq/ (609) 292-4543

issuer's initials TM rec'd by initials J.P.

Att. 3, Unedited Photos
Burlington Beef,
Monroeville, NJ,
Taken by the Cumberland Salem Soil
Conservation District
March 12, 2024



DSC02096



DSC02099

Burlington Beef,
Monroeville, NJ,
Taken by the Cumberland Salem Soil
Conservation District
February 3, 2025



DSC03167



DSC03169

Att. 4, Aerial Imagery
Burlington Beef,
Monroeville, NJ,
Taken from CONNECTExplorer
EagleView



December 7, 2019



April 13, 2018



December 19, 2016



May 13, 2007

Title: Burlington Beef Spray Field

Operations and Maintenance Manual

Subject : Part I - Pump Specs

Filed in Office Files under PUMP

Subject : Part II - Maintenance Schedule

Weekly- visual inspection of spray heads and spray field. Look for buildup solids, ponding or channeling, excessive or lack of vegetative growth

Monthly – 1) Mechanic disassembles Pump and examines Seals, Valves, Lubrication, Excessive Part Wearing. Any questionable parts are replaced. 2) cut excess vegetation growth during warm seasonal months.

Subject ; Part III - Maintenance Log- maintained on office manager computer

- 1/27/25 replace spray head
- 11/4/24 replace 2 spray heads
- 11/1/2024 replace pump flap valve, diaphragm
- 8/26/24 add dirt berm to field
- 7/8/24 replace seal on pump

Subject: Part IV- Weather and Spray Log Book

- Log book with recorded weather and spray conditions is maintained in office file drawer labeled DEP

Subject: Part V- Record Keeping

- Records and maintenance logs are updated by the office manager: Thomas Patten
- Records are maintained in office file drawer labeled-DEP

Subject: Part VI - Burlington Beef Points of contact

Burlington Beef Main Office - 856-358-2321

Henry Kohn - owner 856-296-1778 (mobile)

Cynthia Kohn - owner 609-280-6355 (mobile)

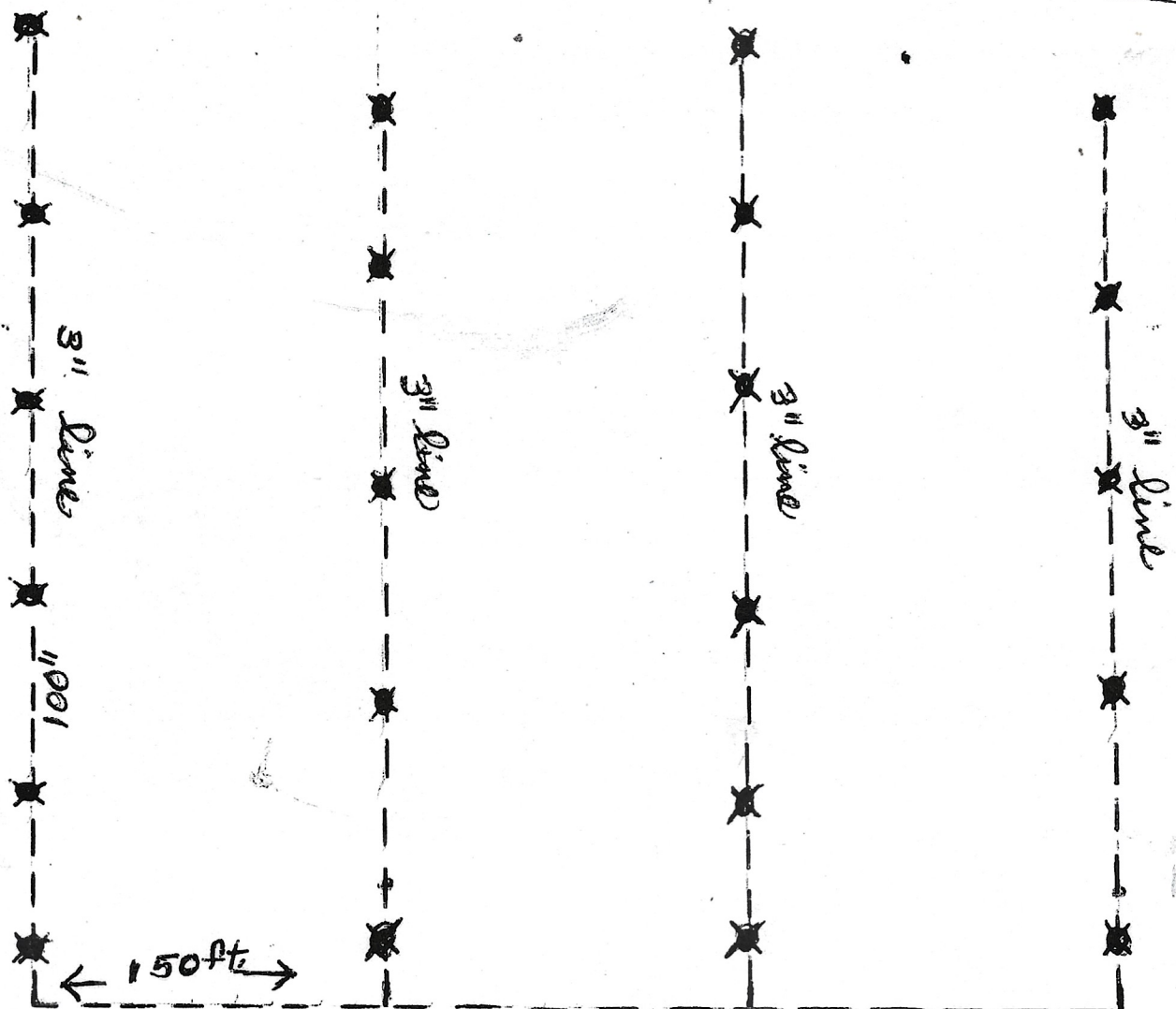
Adam Kohn - owner 609-975-2291 (mobile)

David Kohn - owner 856-524-8101 (mobile)

Thomas Patten - office manager 732-915-8572 (mobile)

BURLINGTON Rd.

LANE



OFFICE

4" Line

SHIP FLOOR 2/1 gal.

IRELL SPRINKLER SYSTEM