

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

Inspection Date(s):	2/6/2023	
Time:	Entry: 2:20 PM (EST)	Exit: 3:30 PM (EST)
Weather Conditions:	Cloudy with temperatures of approximately 46° F	
Media/Program:	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Nolt Services LLC	
Facility or Site Name:	Nolt Services LLC	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	4953 – Refuse Systems The Facility representative was unsure of the Facility's SIC code. The SIC code was inferred by the Inspector based on the industrial activities occurring at the time of the inspection.	
Facility Address:	728 Rettew Mill Road	
(city, state, zip code)	Lititz, PA 17543	
Geographic Coordinates:	40.187604°, -76.208436°	
Mailing address:	728 Rettew Mill Road	
(city, state, zip code)	Lititz, PA 17543	
County:	Lancaster	
Regular Days/Hours of Operation:	Monday – Friday, 6:00 AM – 6:00 PM	
# of Employees at location:	5 full time	
Size of Facility (in acres):	Approximately 66 acres – This includes the whole farm, not just the observed industrial areas	
Receiving Water(s):	Meadow Run	
Date facility est. @ location:	Facility representative stated the Facility commenced operations in 2006	
Onsite Representatives:		
Name: Nelson Nolt	Title: Owner	Phone: (717) 738-1066
	Email: nelson@noltservices.com	
Authorized Official:	→ Contacted? ☒ Yes ☐ No	
Name: Nelson Nolt	Title: Owner	Phone: (717) 738-1066
	Email: nelson@noltservices.com	
Inspector(s):		
Taylor Fontaine (PG Environmental)	Title: Inspector	Phone: (703) 956-1977
Sean Ireland (U.S. EPA Headquarters)	Title: Inspector	Phone: (202) 564-2923
Ivy Koberlein (U.S. EPA Headquarters)	Title: Inspector	Phone: (202) 564-2549

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST
Nolt Services LLC Stormwater
Inspection Date: February 6, 2023

Monica Crosby (U.S. EPA Region III)	Title: Inspector	Phone: (410) 305-2930
Inspection Report Author:		
Name: Taylor Fontaine	Signature: <i>Taylor Fontaine</i>	Date: 3/30/2023
Supervisor Review:		
Name:	Signature:	Date:

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the Clean Water Act (CWA) and its implementing regulations found at 40 CFR Part 122.26. The inspection was unannounced and consisted of interviewing Facility representatives, recording field observations, and taking photographs to document site conditions throughout the Facility at the time of the inspection.

Opening Conference

- 1) On February 6, 2023, U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, conducted an unpermitted industrial facility stormwater inspection at Nolt Services LLC located in Lititz, Pennsylvania (Facility). Taylor Fontaine of PG Environmental, Sean Ireland of U.S. EPA Headquarters (EPA HQ), Ivy Koberlein of EPA HQ, and Monica Crosby of EPA Region III (collectively the EPA Inspection Team) met with the Facility representative. Mr. Taylor Fontaine displayed his CWA credentials, and the EPA Inspection Team conducted an opening conference. The EPA Inspection Team explained the purpose of the inspection was to document the facility's industrial activity and any obligations to apply for a National Pollutant Discharge Elimination System (NPDES) Permit (Permit). At the time of the inspection, the Facility did not have coverage under a Permit.

Weather conditions at the time of the inspection were cloudy with temperatures of approximately 46° F. There was no precipitation during the inspection. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the Lititz, Pennsylvania area received no rain the day before the inspection.

- 2) Credentials presented to: Nelson Nolt – Owner
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements? ☐ Yes ☒ No

¹Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

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Nolt Services LLC Stormwater

Inspection Date: February 6, 2023

According to the Facility representative, the Facility is a permitted septage transfer facility and provided the Septage Transfer Facility Permit number (#101681) with the Pennsylvania Department of Environmental Protection (PADEP). However, the Facility did not have an NPDES stormwater permit at the time of the inspection.

- 4) Facility has been individually notified by Permit authority or EPA that it is subject to stormwater requirements? ☐ Yes ☒ No

FACILITY'S OPERATION & PRODUCT DESCRIPTION

The Facility was comprised of approximately 66 acres located on Rettew Mill Rd in the City of Lititz, Pennsylvania. The acreage includes a working farm, predominantly cropland, as well as the industrial operations described below. The Facility is bordered by private farmland on all sides. The Facility includes several buildings used for materials and equipment storage.

According to the Facility representative, the Facility serves as an on-lot sewage disposal, treatment, and transfer facility. The representative stated the Facility receives and treats manure, liquid waste from food processing facilities (e.g. food processing washout), and biosolids. These materials are sorted and stored/treated in the following concrete in-ground treatment tanks, as identified by the Facility representative. Once the products are ready, they are pumped out of the tanks via vacuum trucks or lagoon pumps. The Facility representative stated that treated waste is then utilized for land application/fertilizer. The tanks below were observed during the inspection:

- P1 – 396,000 – gallon tank designed to store and treat waste via lime stabilization or other treatment methods.
- P2 – 252,000 – gallon tank designed to store and treat manure.
- P3 – 1,353,600 – gallon tank designed to store and treat biosolids and food processing waste.

The EPA Inspection Team observed that all the identified tanks above were uncovered and exposed to stormwater at the time of the inspection.

Other industrial facilities owned/operated by same business entity? ☐ Yes ☒ No

SECTION II – OBSERVATIONS

SITE EVALUATION

Pollutant Sources	Observations
Loading/Unloading Operations	Materials and products are shipped in and out via semi-trucks.
Industrial Manufacturing/Processing Operations	According to the Facility representative, Facility industrial operations (waste storage and treatment) occur entirely outdoors and are exposed to stormwater.

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SITE EVALUATION	
Industrial Machinery & Equipment Storage	The EPA Inspection Team observed outside uncovered storage areas for vehicles and Facility equipment (refer to <u>Appendix B, Photographs DSCN5017 and DSCN5068</u>). The outside storage areas did not have any cover. The Facility representative stated that the Facility has its own trucks, but also receives septage/biosolids materials directly from customers/contractors via their respective vehicles.
Storage of Industrial Materials or Products	The industrial products (i.e. septage/biosolids materials) are stored entirely in the three (3) concrete in-ground treatment tanks listed above in the Facility's Operation & Product Description section of this report (refer to <u>Appendix B, Photographs DSCN5018 – DSCN5021</u>).
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection Team observed six (6) 1,000-gallon diesel tanks used for fueling onsite equipment and vehicles (refer to <u>Appendix B, Photographs DSCN5039, DSCN5040, and DSCN5057</u>). It was unclear if the tanks were double walled, but they were covered by a canvas awning and were within a concrete secondary containment structure. It is unclear whether the secondary containment structure was large enough for the oil stored in that area.
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed one (1) dumpster with a closed lid used for general waste located adjacent to the fuel storage area (refer to <u>Appendix B, Photograph DSCN5057</u>).
Waste Treatment Facilities (e.g., Pretreatment Systems)	The Facility serves as an on-lot sewage disposal, treatment, and transfer facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	As stated above in the Liquid Storage section of the checklist, the EPA Inspection Team observed six (6) 1,000-gallon diesel tanks used for fueling onsite equipment and vehicles (refer to <u>Appendix B, Photographs DSCN5039, DSCN5040, and DSCN5057</u>).
Sediment & Erosion Controls	The EPA Inspection Team did not observe any sediment and erosion controls at the time of the inspection.
Spills/Leaks Handling	The EPA Inspection Team did not observe spill containment measures or materials (e.g., spill kits or absorbents) at the Facility.
Outside Shelters	☐ Temporary (Date Established _____) ☒ Permanent One outside shelter at the Facility is used to cover the six (6) 1,000-gallon diesel tanks.

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Nolt Services LLC Stormwater
Inspection Date: February 6, 2023

SITE EVALUATION	
Evidence of non-stormwater sources/discharges (allowable if permitted under the Permit)?	None observed.
Evidence of process wastewater sources/discharges?	The EPA Inspection Team did not observe any evidence of process wastewater sources/discharge.
OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	Meadow Run flows southwest through the Western portion of the Facility. Due to the topography, the EPA Inspection Team observed several points of potential discharge adjacent to Tank P2 and the maintenance/storage building. Stormwater in this area appears it would flow north from these areas towards Meadow Run located approximately 25 feet north of the Facility (refer to <u>Appendix B, Photographs DSCN5065 and DSCN5066</u>).
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	The EPA Inspection Team did not observe any pollutants in Meadow Run; however, approximately six cattle were located in a vegetated area of approximately 3,000 square feet at the very beginning to Meadows Run.
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	None observed.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The EPA Inspection Team observed that stormwater from the middle and north portions of the Facility would flow northward towards Meadow Run (refer to <u>Appendix B, Photographs DSCN5022-DSCN5026, and DSCN5061-DSCN5067</u>). Stormwater from the south portion of the Facility would flow north across a grass field. There were no drains or stormwater conveyance pipes observed during the inspection, other than the outlet from a pipe that conveyed stormwater from a residential neighborhood located approximately 3,000 feet east of the operations facility.

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed the Facility conducts refuse management operation concrete manufacturing at the Facility, an industrial activity classified under SIC 4953 – Refuse Systems.

- a. Businesses classified under SIC Code 4953 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. Waste treatment operations occur outside and are exposed to stormwater.
 - c. The Facility did not have coverage under a Permit at the time of the inspection.
- 2) The EPA Inspection Team observed several areas at the Facility adjacent to the tanks where there was evidence of spillage on the gravel and paved surfaces (refer to Appendix B, Photographs DSCN5019, DSCN5020, DSCN5034-DSCN5038, DSCN5043-DSCN5047, DSCN5054, DSCN5055, DSCN5059, and DSCN5060). In some instances, it was unclear if the observed spillage was waste materials or petroleum based. Due to the topography, there was the potential for stormwater would be directed toward the headwaters of Meadow Run.

SECTION IV – CLOSING CONFERENCE

After the site walk, the EPA Inspection Team met with the Facility representative from Nolt Services LLC for a closing conference and shared preliminary observations. The EPA Inspection Team reiterated that all preliminary observations discussed were not compliance determinations; however, it was observed there was the potential for pollutants to be discharged from the facility. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 3:30 PM (EST).

SECTION V – LIST OF APPENDICES

Appendix A – Aerial Map

Appendix B – Photograph Log

Appendix A. Aerial Map
Clean Water Act Inspection
Nolt Services LLC.

Inspection Date: February 6, 2023

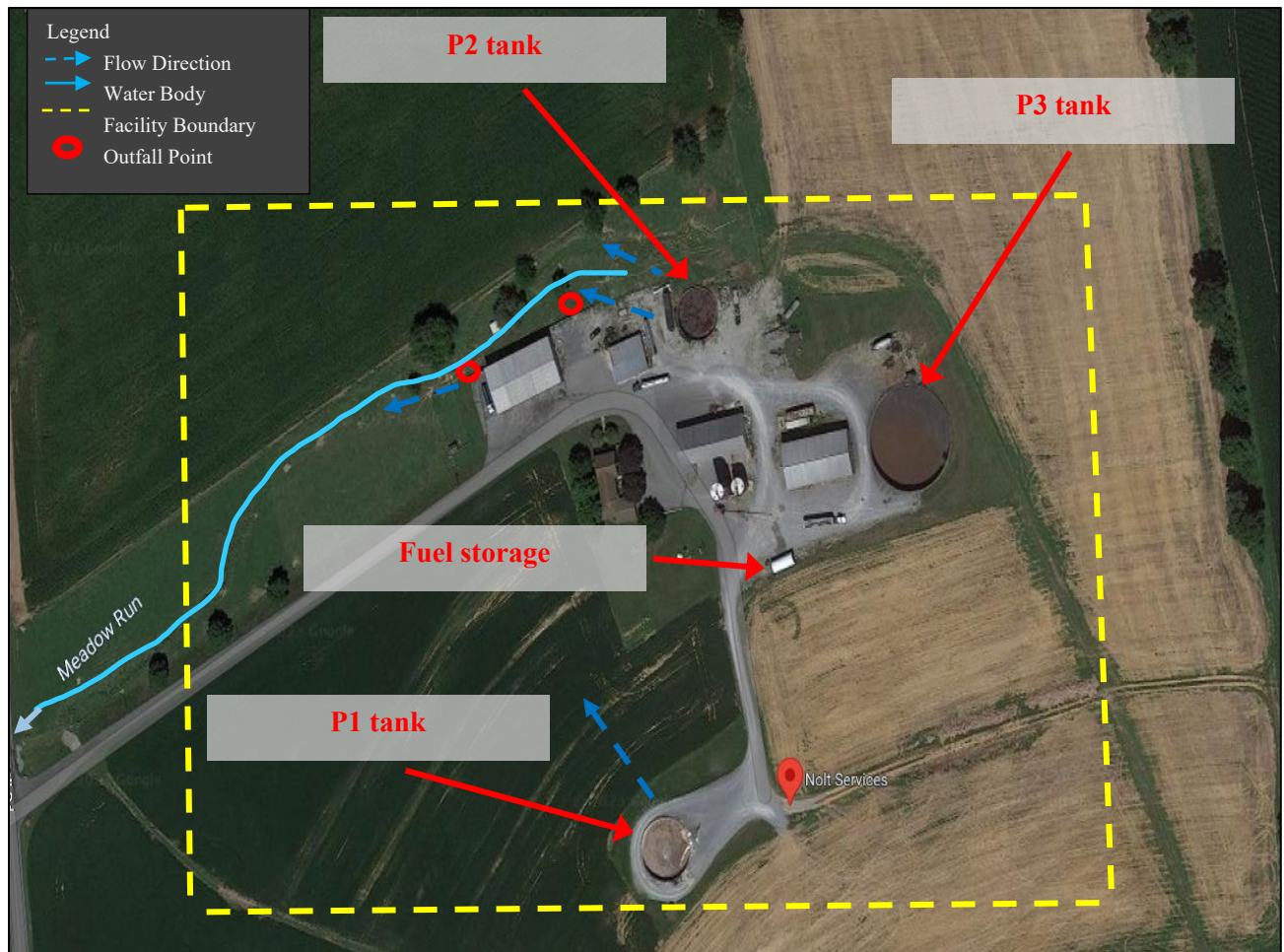


Figure 1. Aerial image of Nolt Services LLC from Google Maps (imagery dated 2023). Meadow Run flows from the east to the west and is located on the north side of the Facility.

Appendix B. Photograph Log
Clean Water Act Inspection
Nolt Services LLC.

Inspection Date: February 6, 2023

* **Disclaimer:** All photos were taken on 2/6/2023. Some photographs do not contain GPS coordinates.

DSCN5017.JPG



N 38° 46' 23.27"
W 77° 36' 04.20"

2/5/2023 2:43:59 PM

Description	Facing northeast of Facility machinery storage with Meadows Run flowing right to left just beyond the gravel lot.
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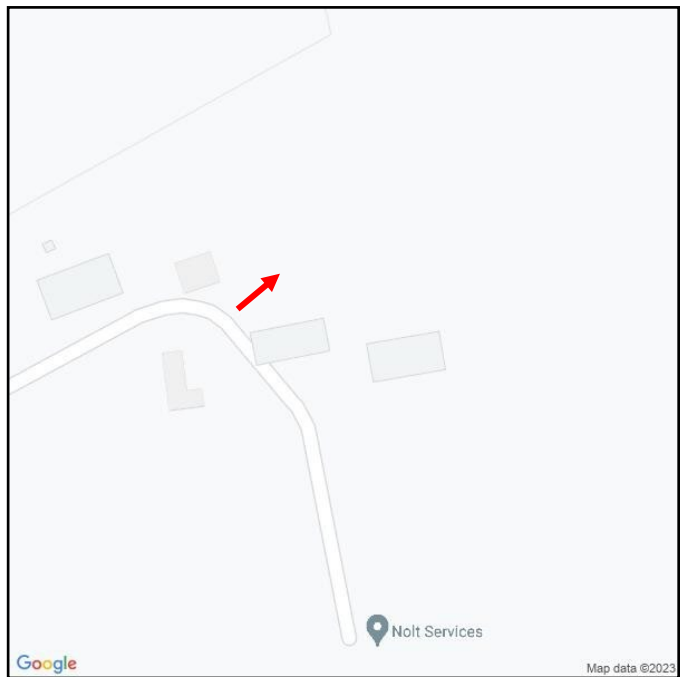
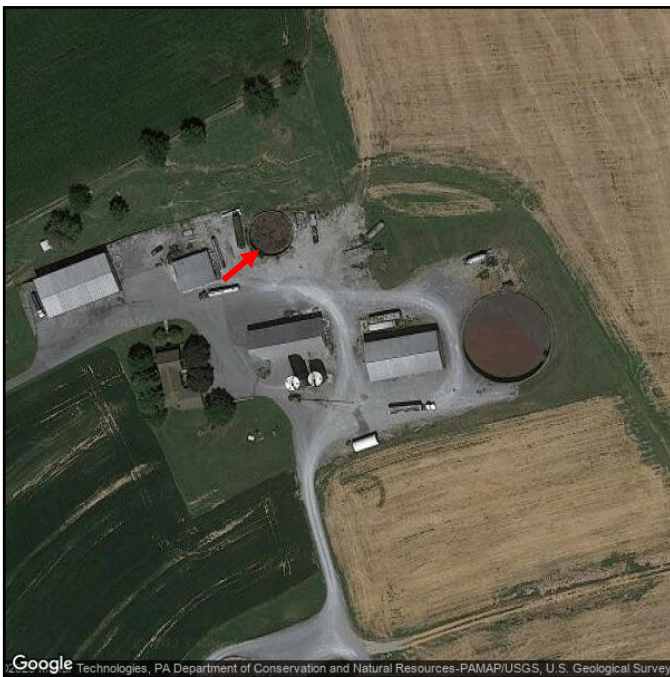
DSCN5018.JPG



2/5/2023 2:44:18 PM

Description	Facing northeast, of Tank P2, a 252,000 – gallon tank designed to store and treat manure located in the north area of the Facility.
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DSCN5019.JPG



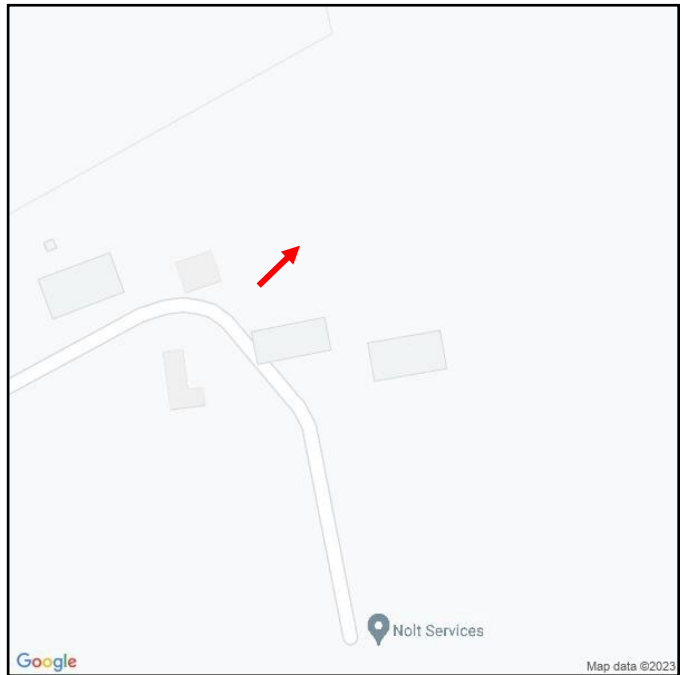
Description	Tank P2, note the spillage in front of the tank.
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DSCN5020.JPG



N 40° 11' 14.98"
W 76° 12' 28.31"

2/5/2023 2:44:38 PM



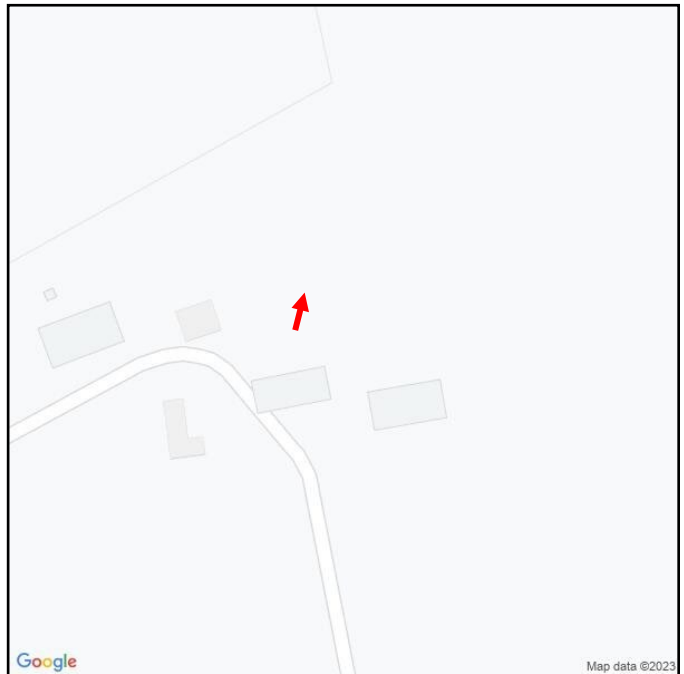
Description	Tank P2, note the additional spillage in front of the tank
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DSCN5021.JPG



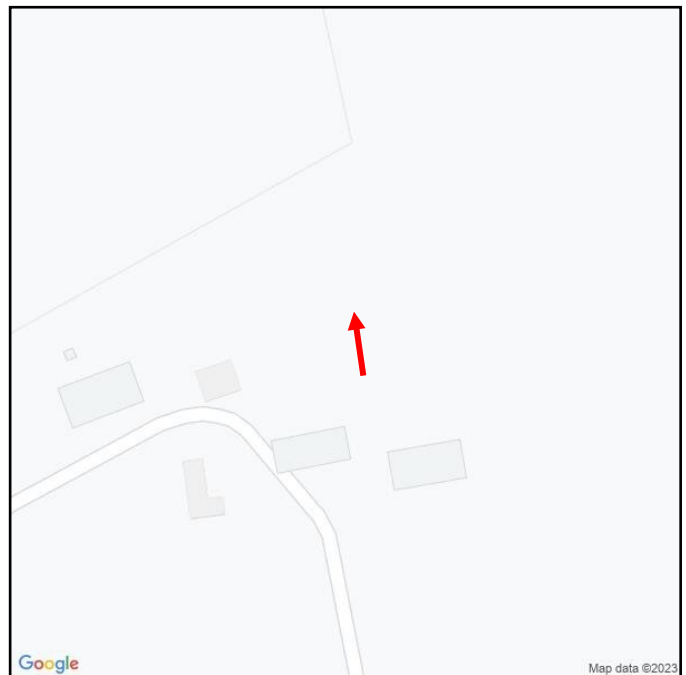
N 40° 11' 15.62"
W 76° 12' 28.32"

2/5/2023 2:44:59 PM



Description	Facility equipment by Tank P2.
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DSCN5022.JPG



Description	Meadow Run section that is piped flowing from east to west from a residential neighborhood 3,000 feet to the east along the Facility's north boundary.
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DSCN5023.JPG



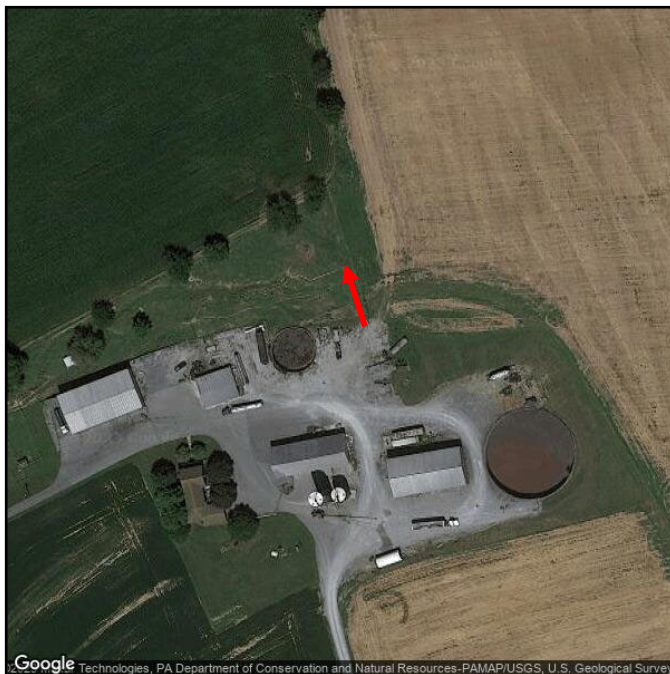
Description	Meadow Run viewed from Tank P2.
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DSCN5024.JPG



N 40° 11' 16.49"
W 76° 12' 28.67"

2/5/2023 2:45:34 PM



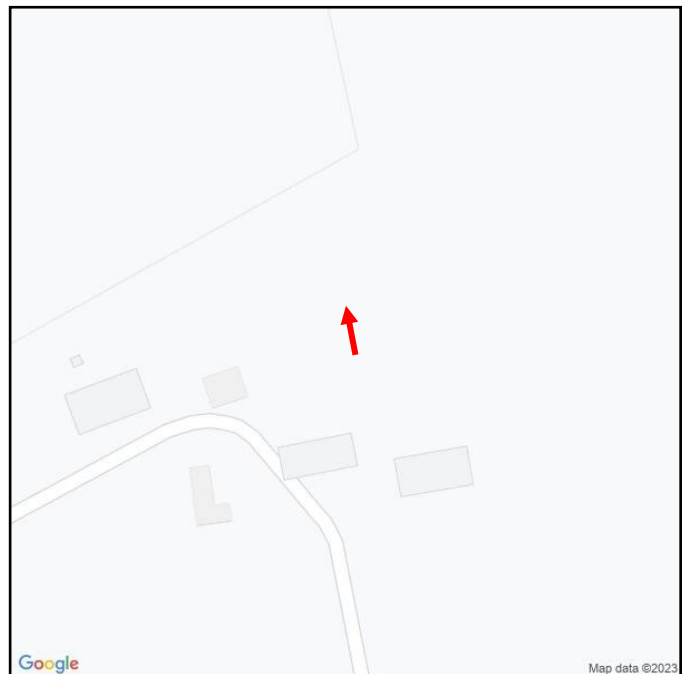
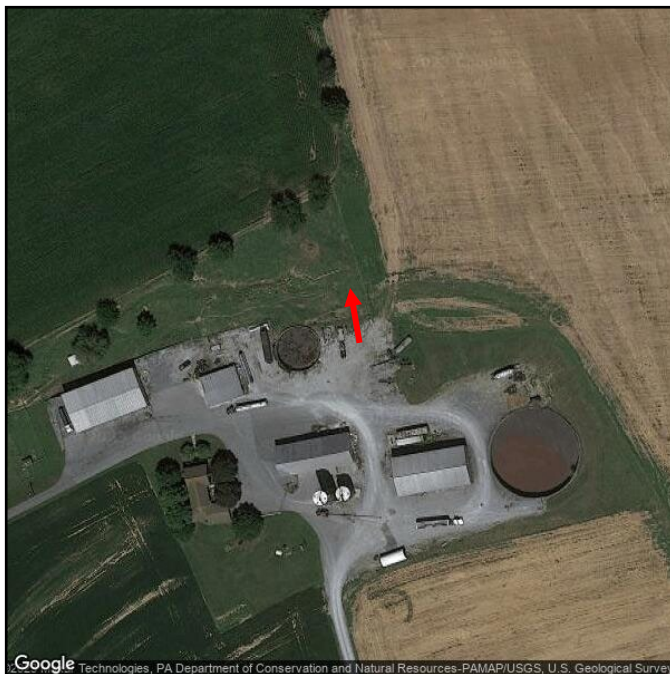
Description	Meadow Run.
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DSCN5025.JPG



N 40° 11' 16.48"
W 76° 12' 28.74"

2/5/2023 2:46:09 PM



Description	Area upgradient of Meadow Run.
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DSCN5026.JPG



N 40° 11' 16.46"
W 76° 12' 29.02"

2/5/2023 2:46:16 PM



Google Technologies, PA Department of Conservation and Natural Resources-PAMAP/USGS, U.S. Geological Survey



Google Map data ©2023

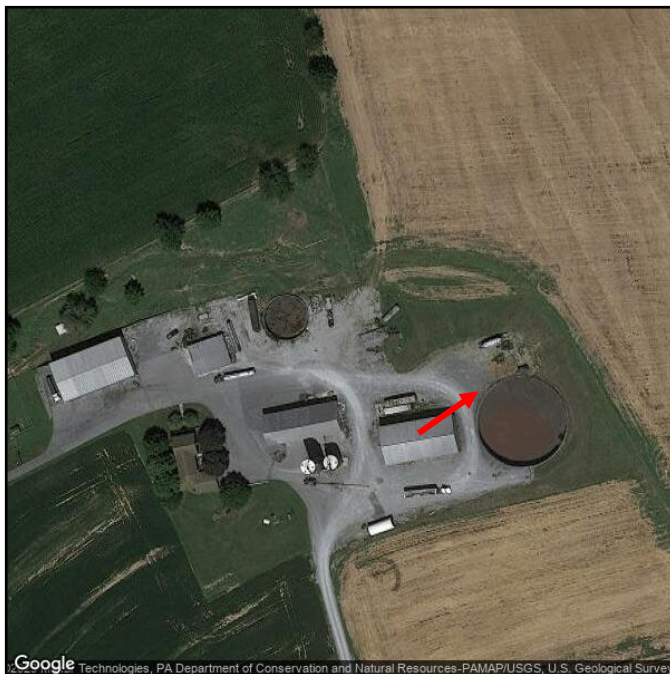
Description	Additional view of Meadow Run with outlet from pipe coming from residential neighborhood located 3,000 feet to the east.
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DSCN5027.JPG

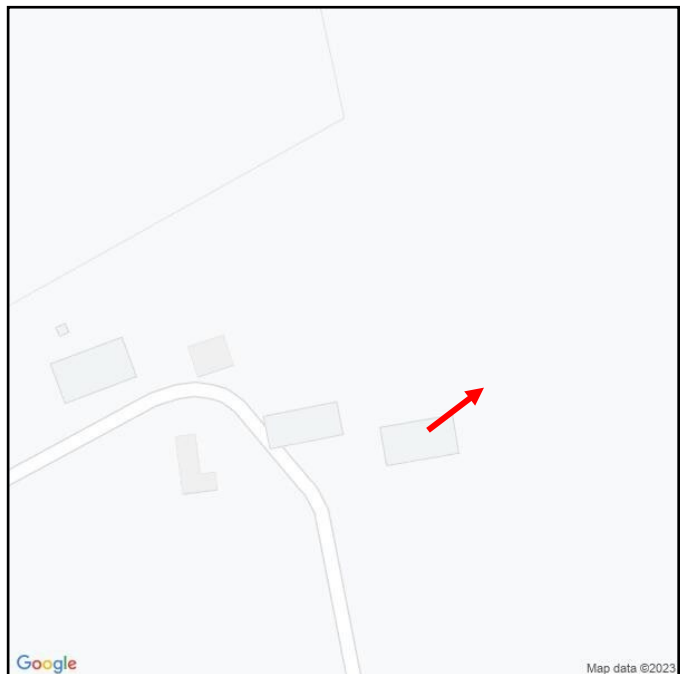


N 40° 11' 16.07"
W 76° 12' 28.53"

2/5/2023 2:48:23 PM



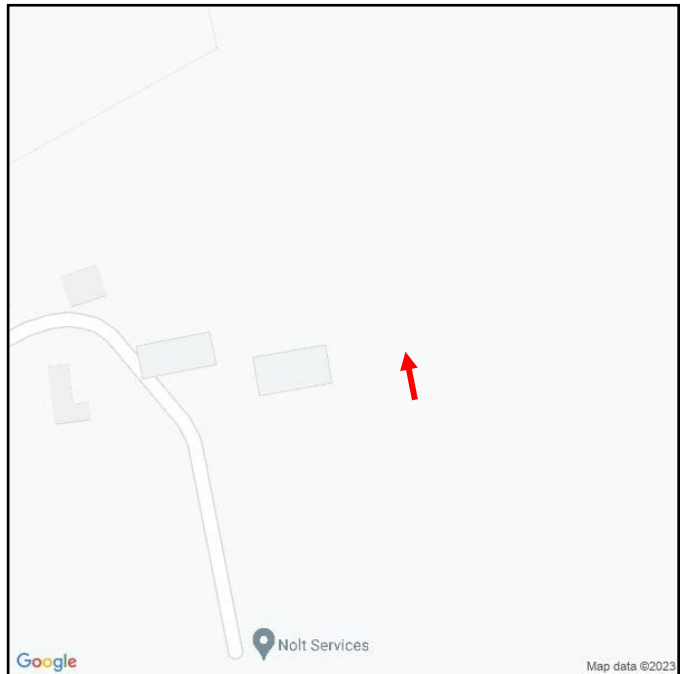
Google Technologies, PA Department of Conservation and Natural Resources-PAMAP/USGS, U.S. Geological Survey



Map data ©2023

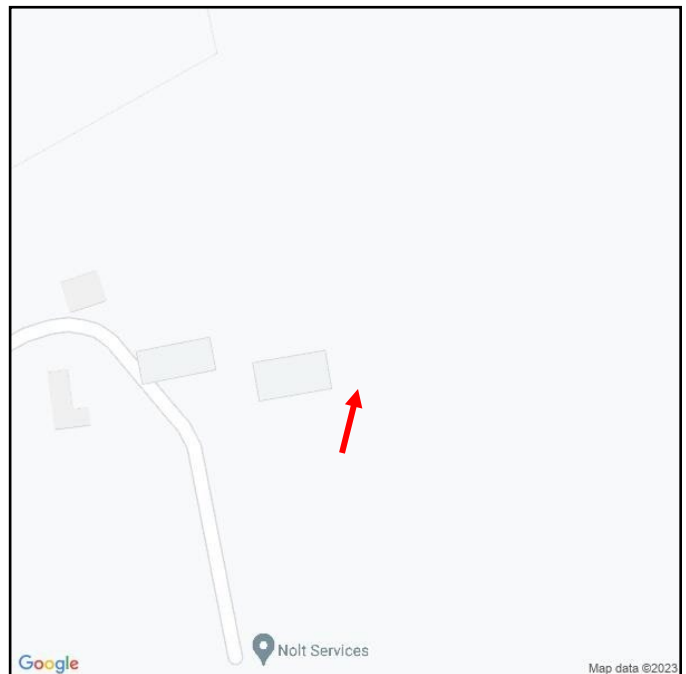
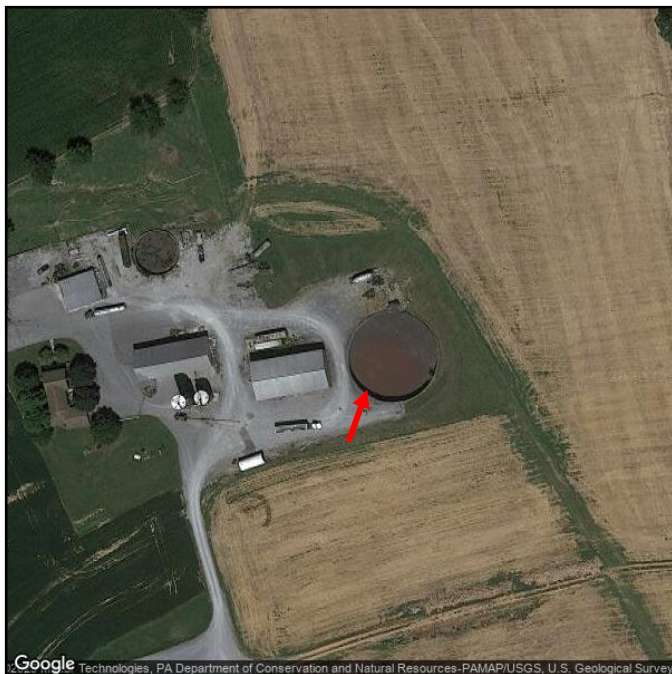
Description	Tank P3, a 1,353,600-gallon tank designed to store and treat biosolids and food processing waste.
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DSCN5028.JPG



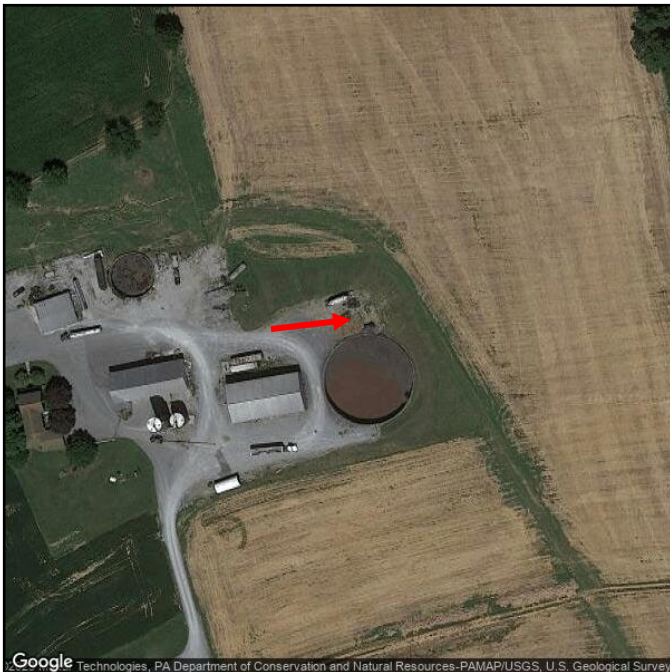
Description	Tank P3.
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DSCN5029.JPG



Description	Tank P3.
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DSCN5030.JPG



Description	Furnace adjacent to Tank P3.
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DSCN5031.JPG



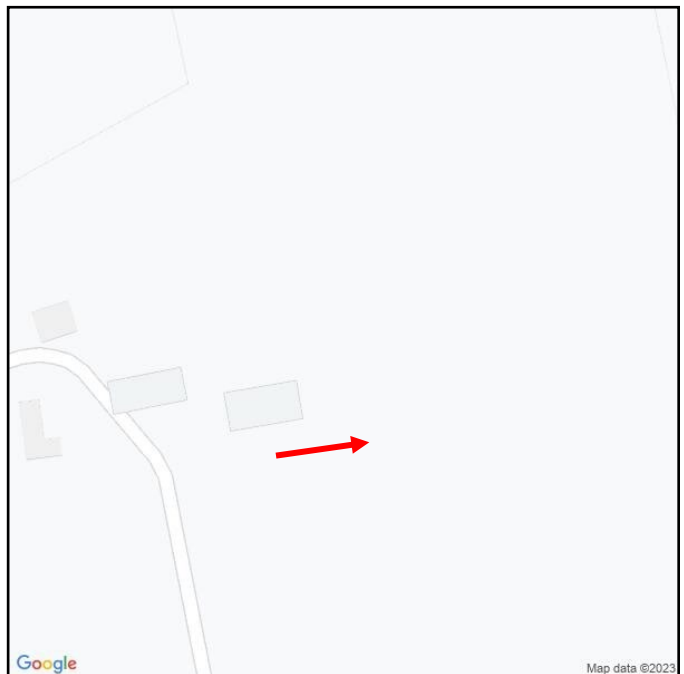
Description	Connection pipe to Tank P3.
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DSCN5032.JPG



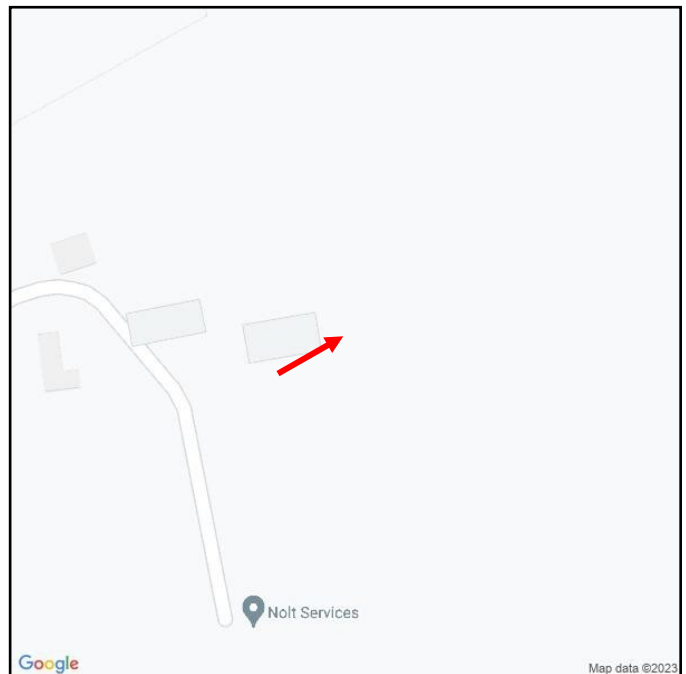
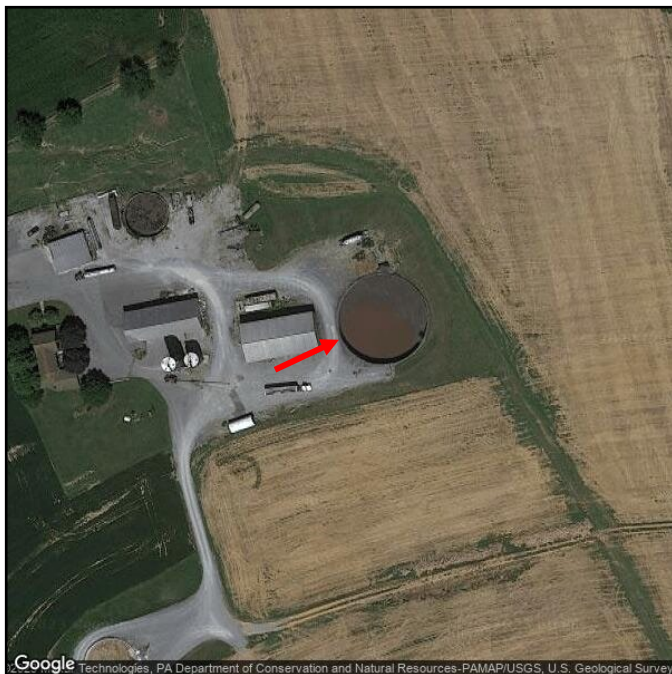
N 40° 11' 15.61"
W 76° 12' 25.82"

2/5/2023 2:50:44 PM



Description	Connection pipes for Tank P3.
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DSCN5033.JPG



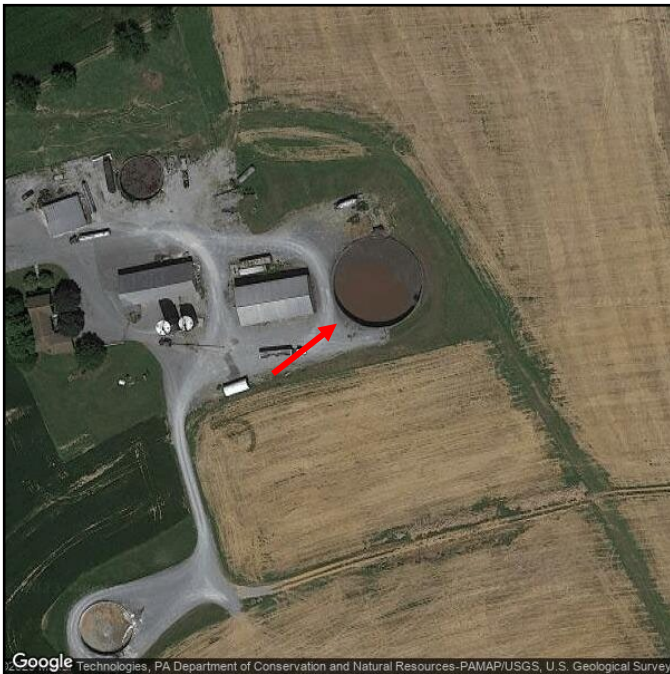
Description	Gate for Tank P3.
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DSCN5034.JPG

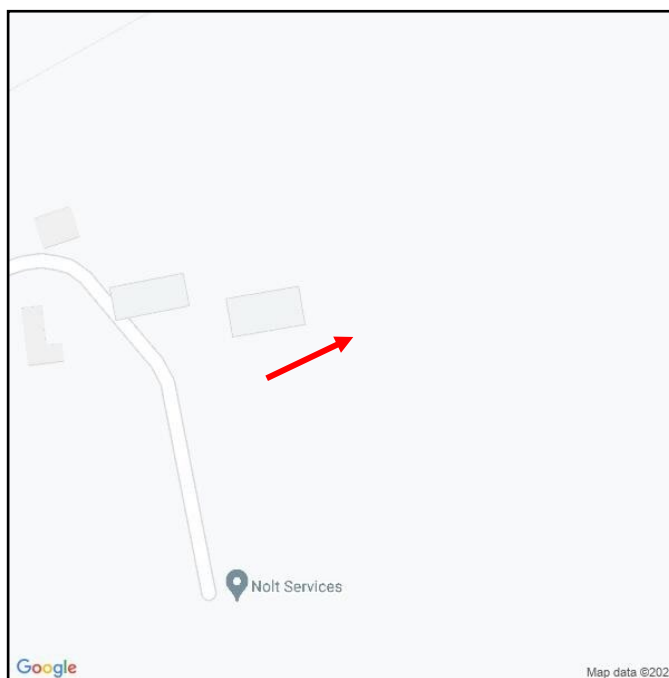
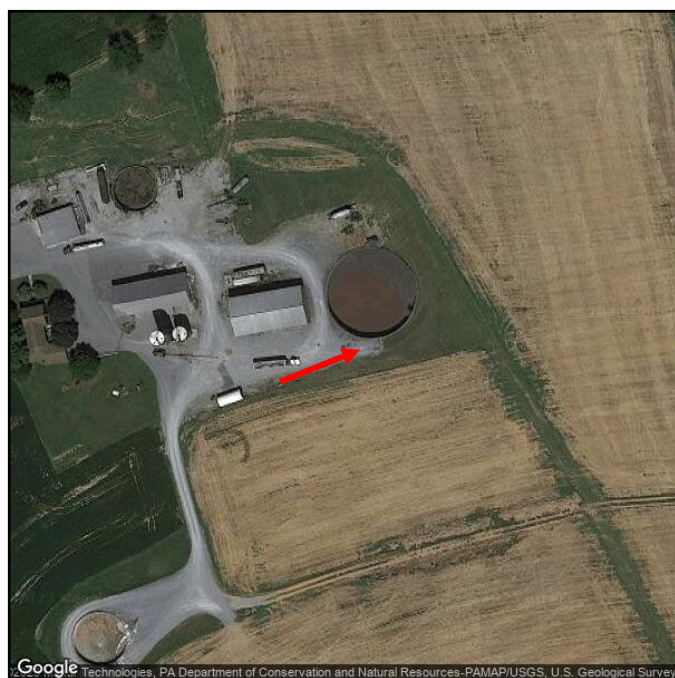


N 40° 11' 14.25"
W 76° 12' 26.05"

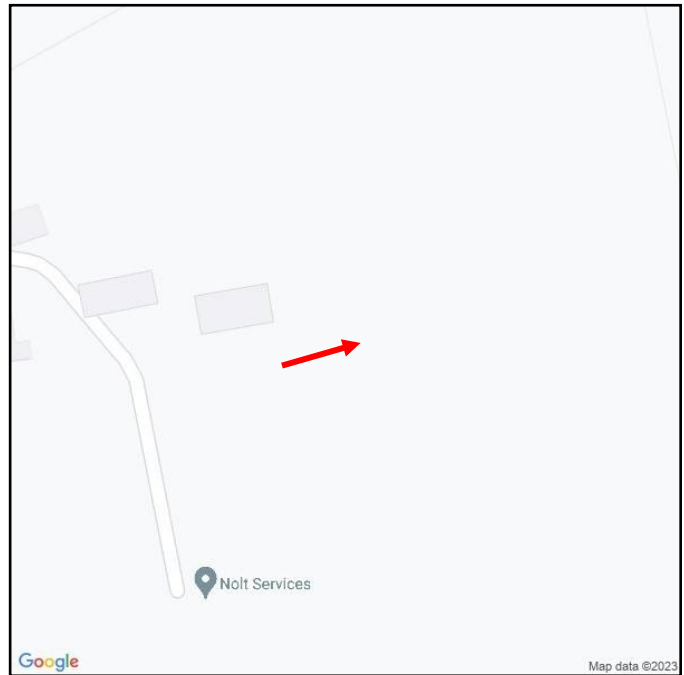
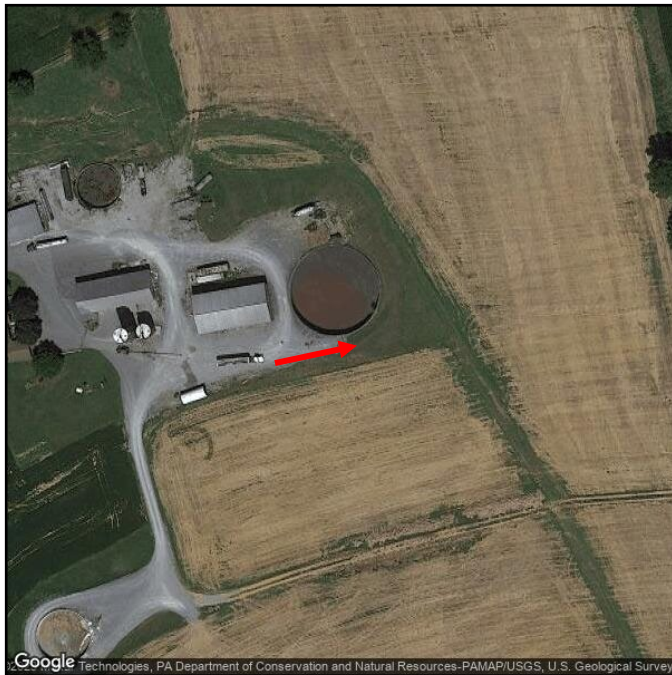
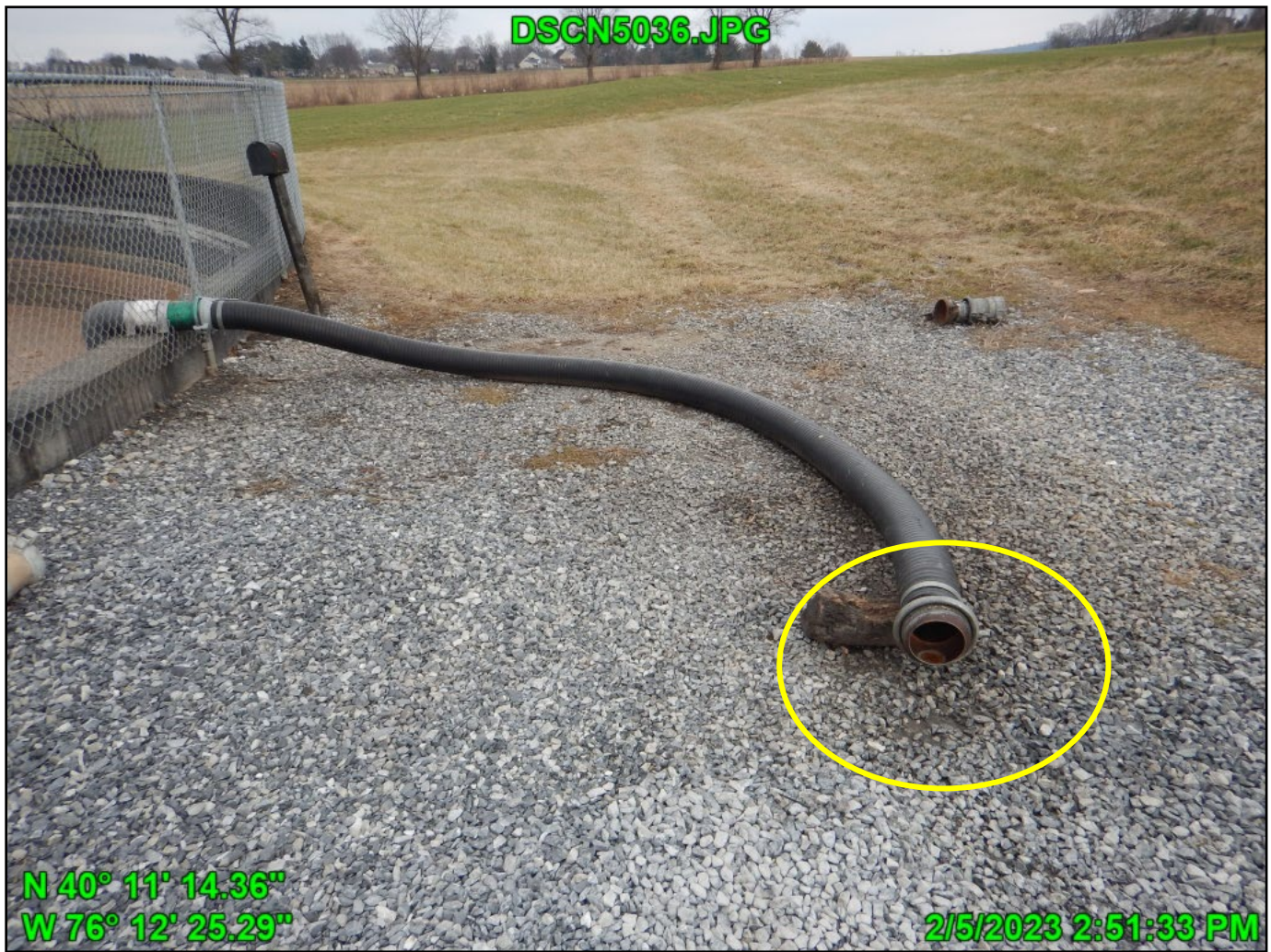
2/5/2023 2:51:07 PM



Description	Spillage staining adjacent to Tank P3.
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Description	Closer view of the spillage staining as shown in Photograph DSCN5034.
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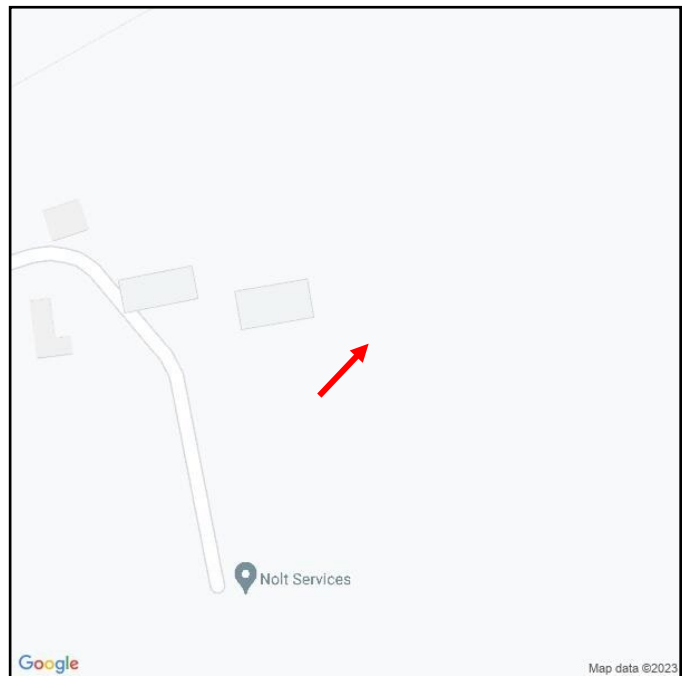
Description	Spillage staining from the connection pipes to Tank P3.
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DSCN5037.JPG

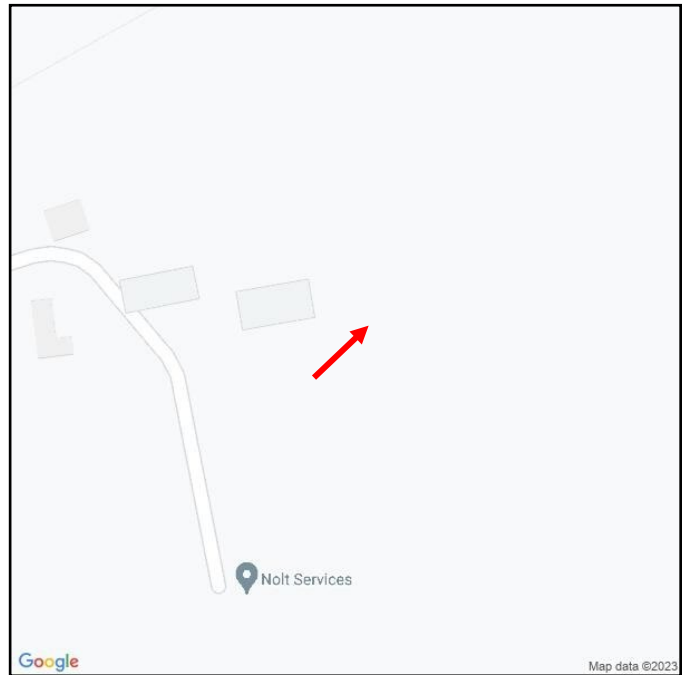
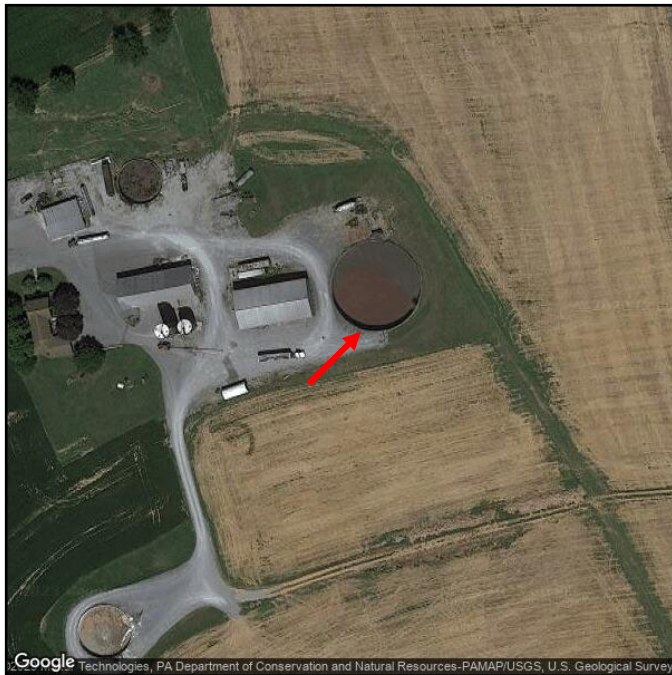
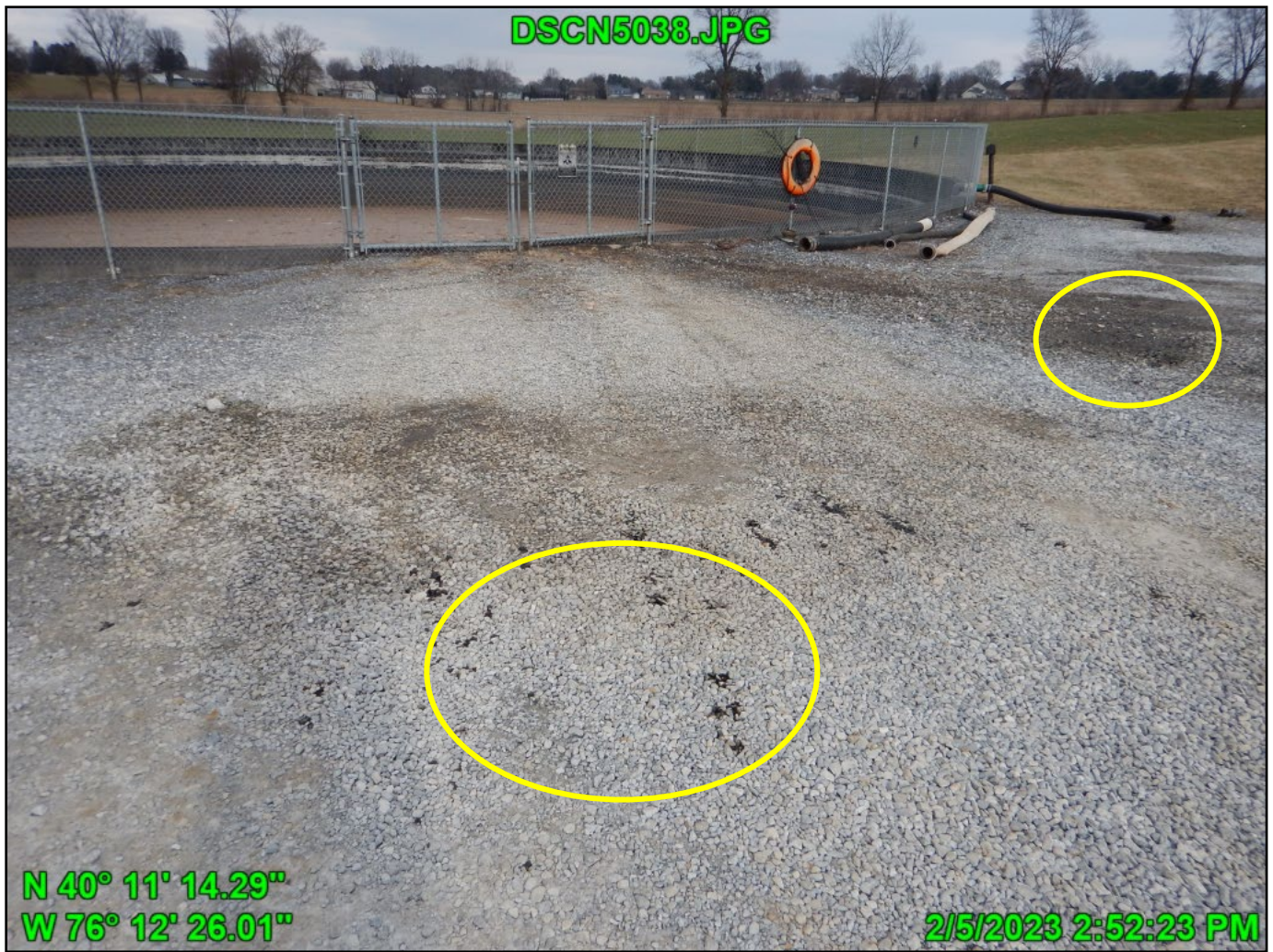


N 40° 11' 14.26"
W 76° 12' 25.97"

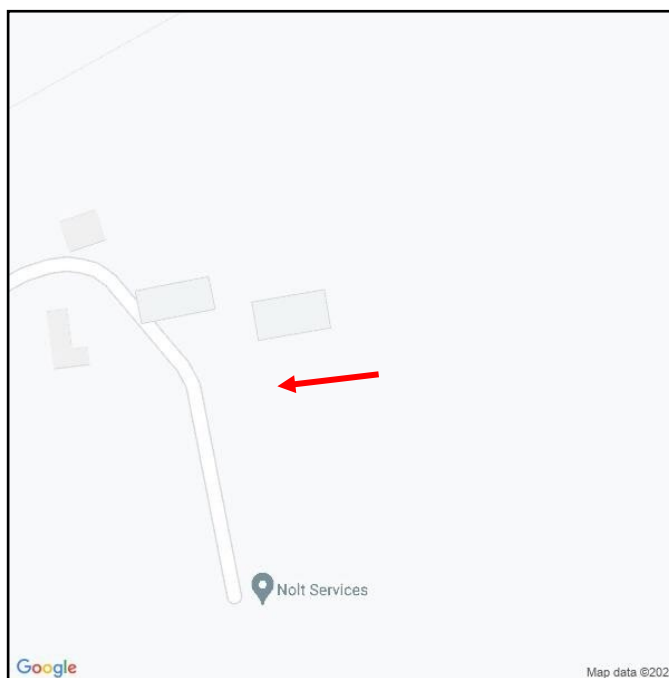
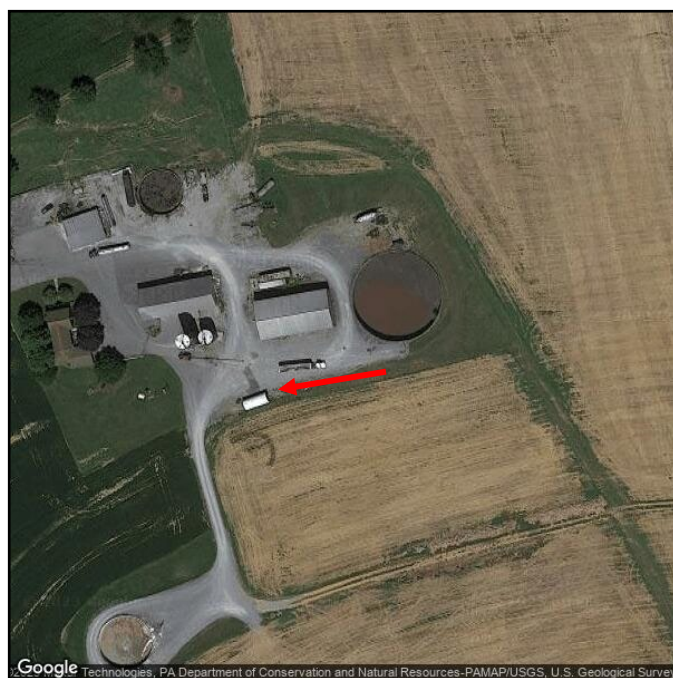
2/5/2023 2:51:52 PM



Description	Spillage staining adjacent to Tank P3.
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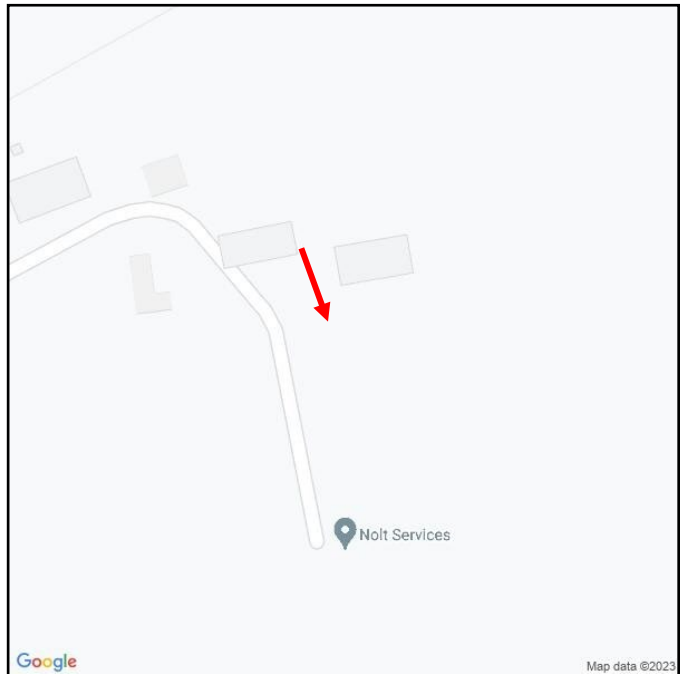
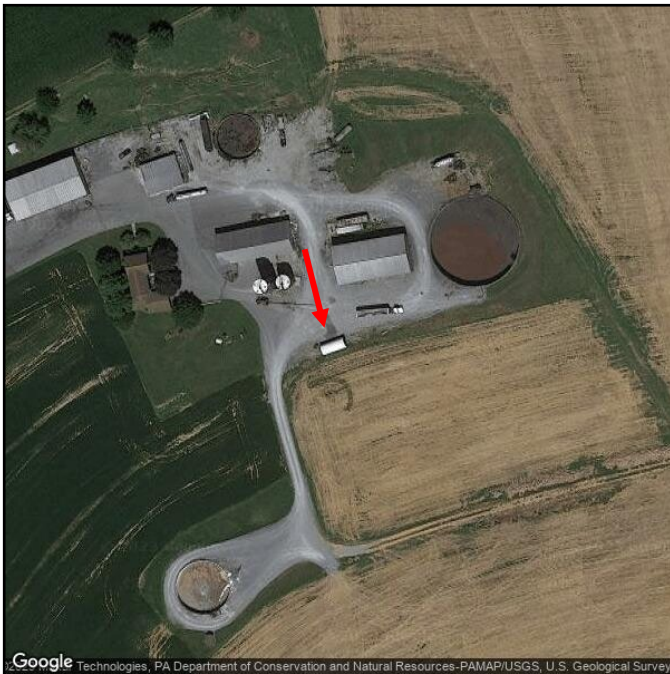


Description	Spillage staining adjacent to Tank P3.
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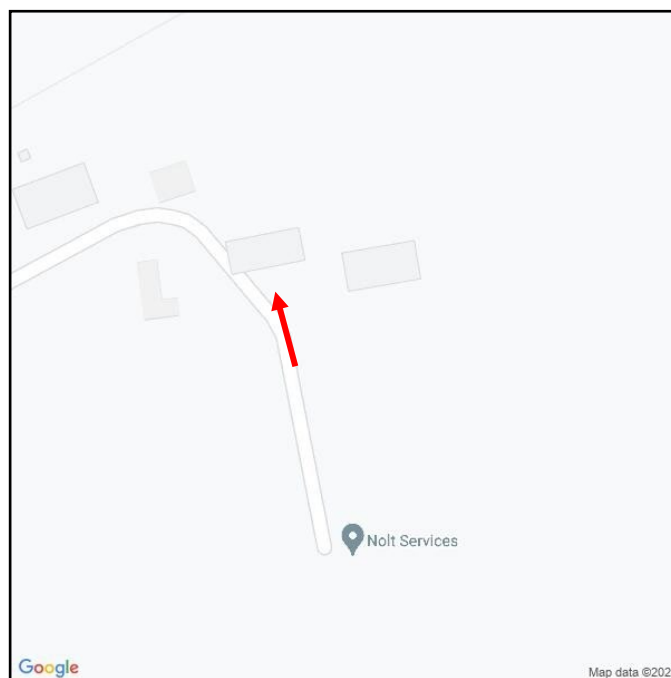
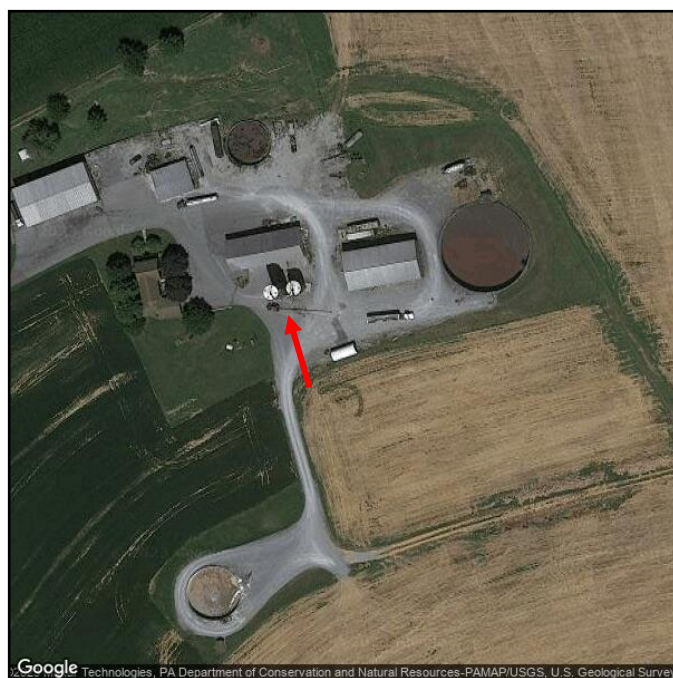
Description	Six (6) 1,000-gallon diesel tanks used for fueling onsite equipment and vehicles under a canvas structure.
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DSCN5040.JPG



Description

Front view of the six (6) 1,000-gallon diesel tanks used for fueling onsite equipment and vehicles under a canvas structure.



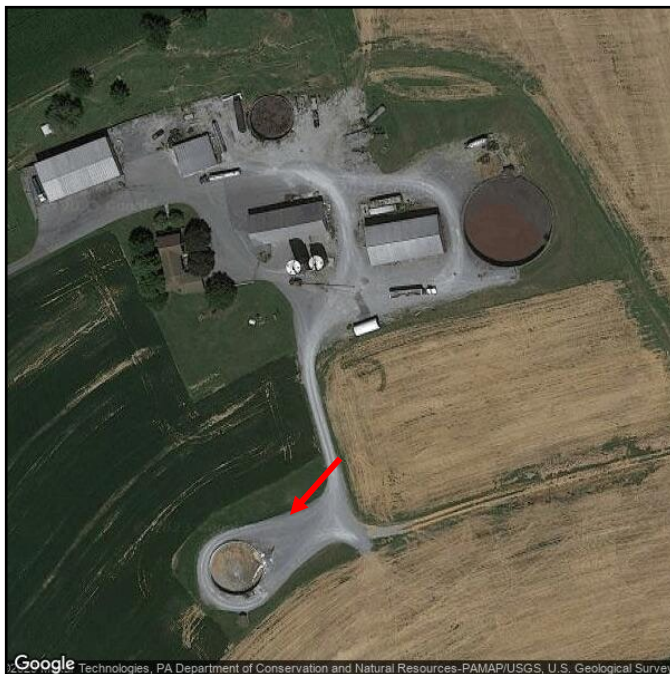
Description	750-gallon fuel container for farm use, located in front of two silos.
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DSCN5042.JPG

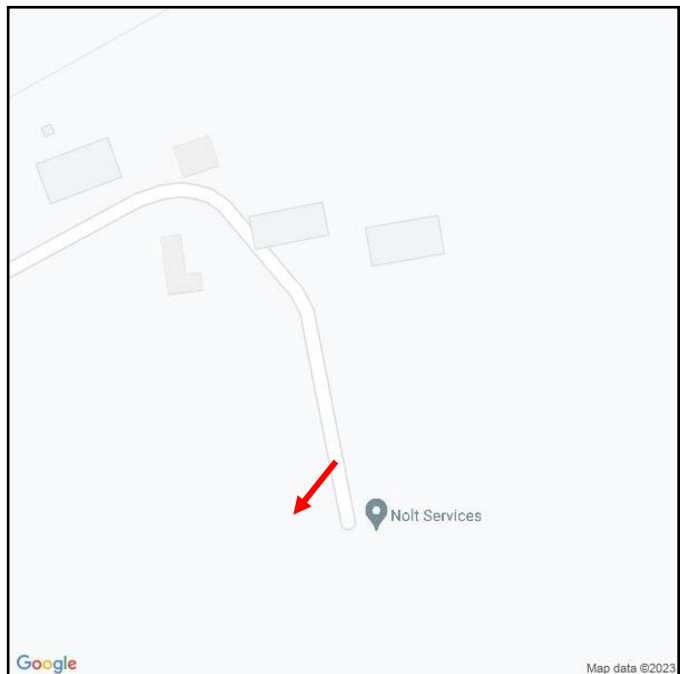


N 40° 11' 13.42"
W 76° 12' 28.27"

2/5/2023 2:55:52 PM



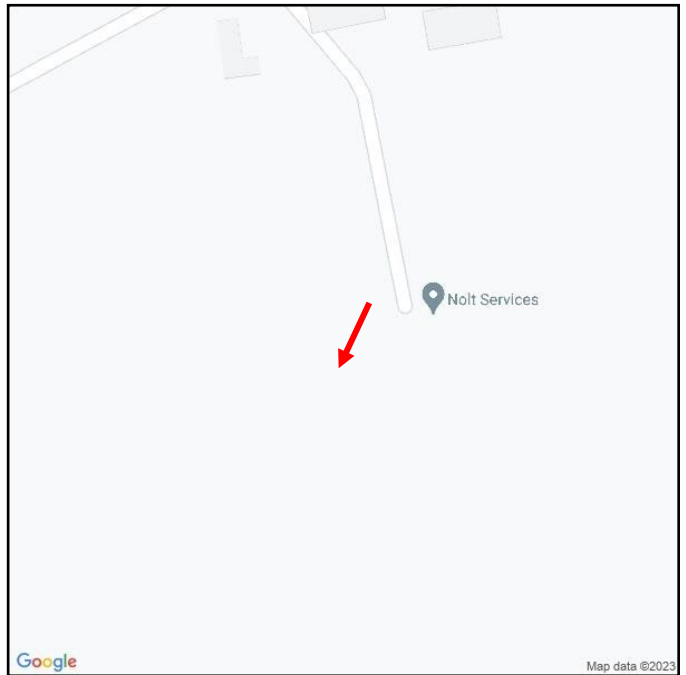
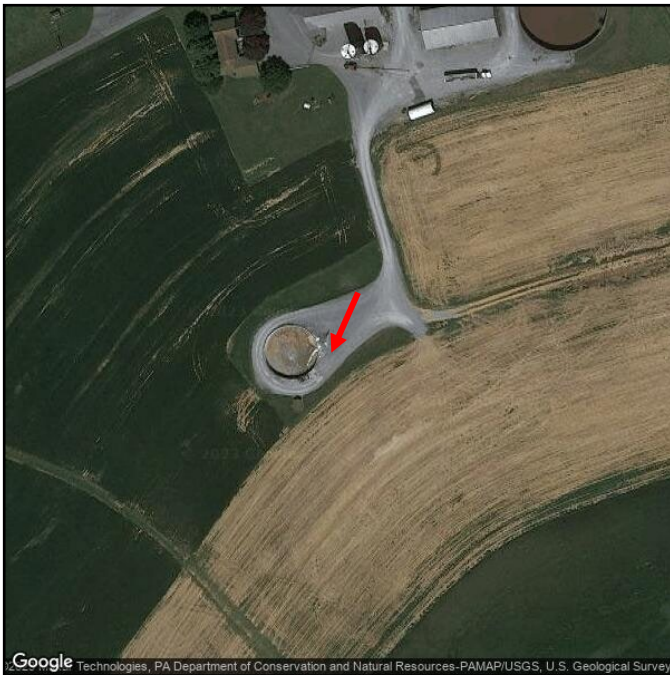
Google Technologies, PA Department of Conservation and Natural Resources-PAMAP/USGS, U.S. Geological Survey



Google Map data ©2023

Description	Upgradient view of Tank P3.
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DSCN5043.JPG



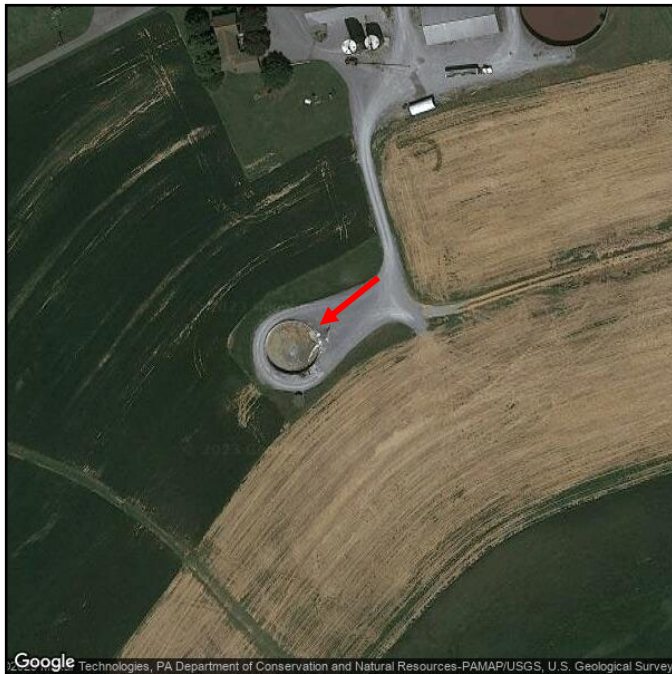
Description	Lime and unknown spillage adjacent to Tank P1. P1 stores and treats waste via lime stabilization.
-------------	---

DSCN5044.JPG

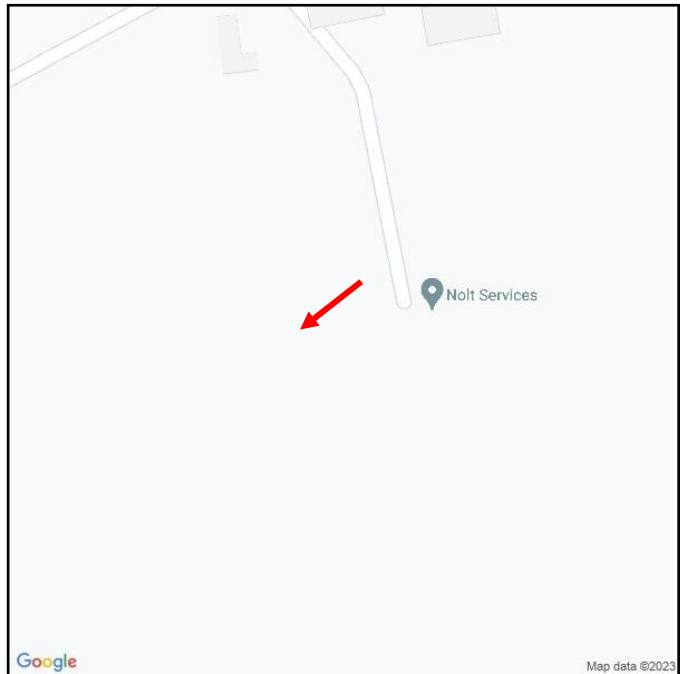


N 40° 11' 10.53"
W 76° 12' 29.24"

2/5/2023 2:56:16 PM

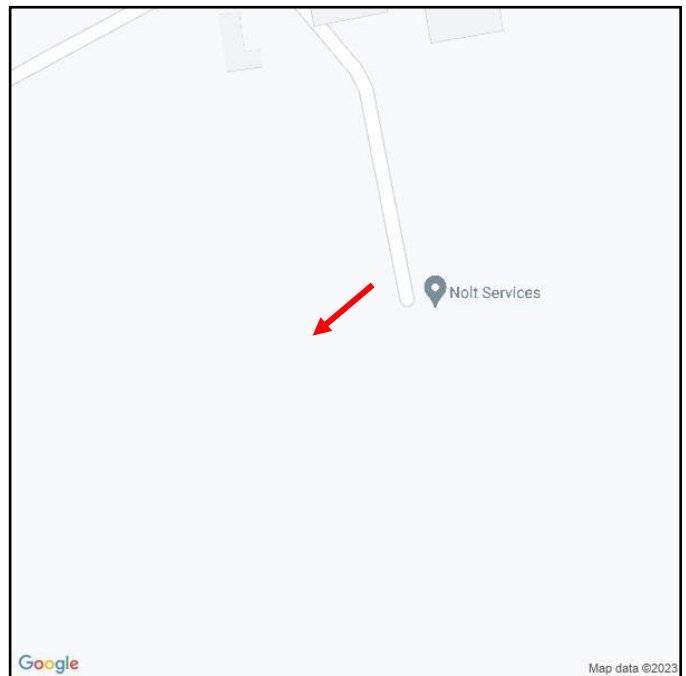
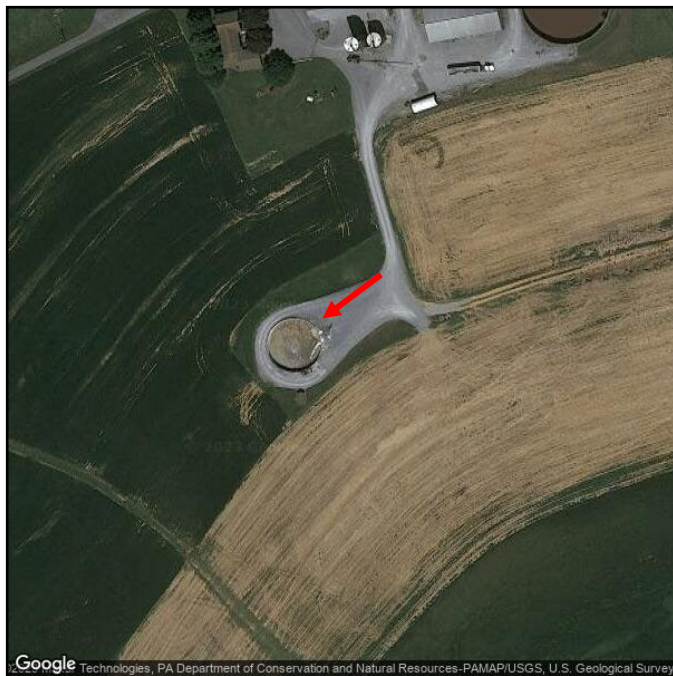


Google Technologies, PA Department of Conservation and Natural Resources-PAMAP/USGS, U.S. Geological Survey



Google Map data ©2023

Description	Lime and unknown spillage adjacent to Tank P1.
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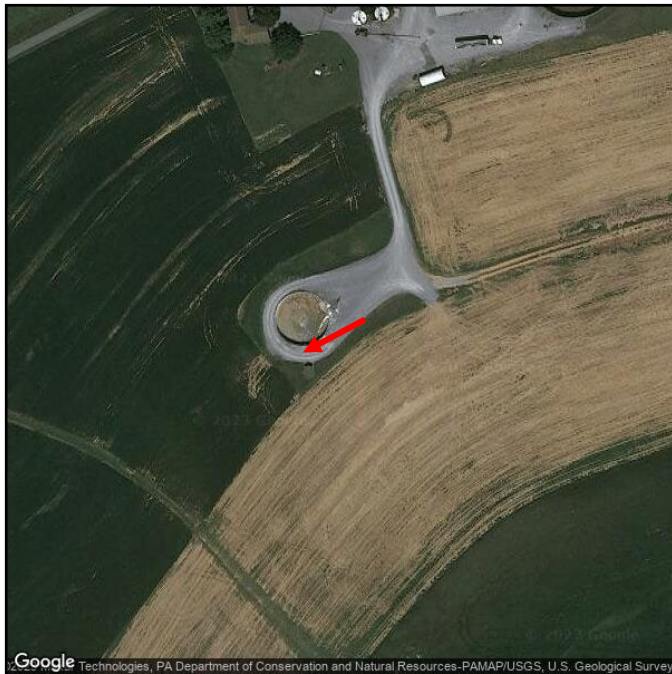
Description	Lime and unknown spillage adjacent to Tank P1.
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DSCN5046.JPG

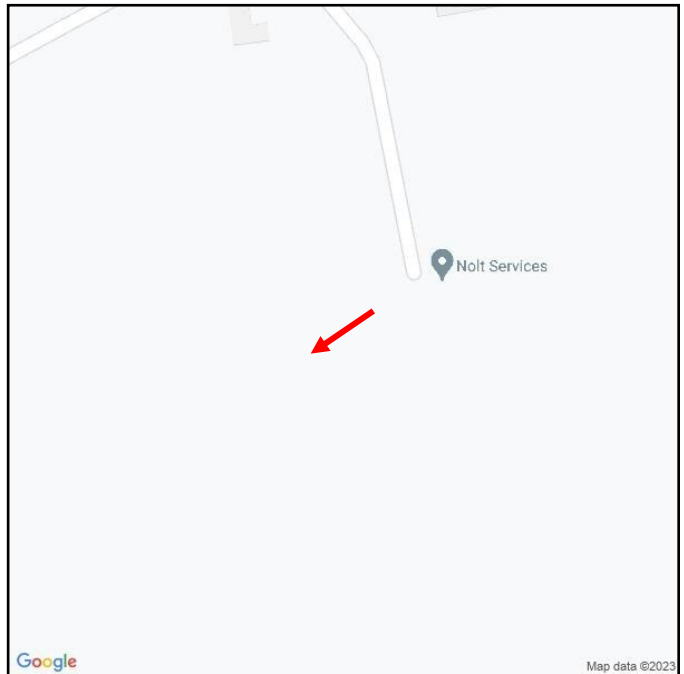


N 40° 11' 10.15"
W 76° 12' 29.42"

2/5/2023 2:56:37 PM



Google Technologies, PA Department of Conservation and Natural Resources-PAMAP/USGS, U.S. Geological Survey



Google Map data ©2023

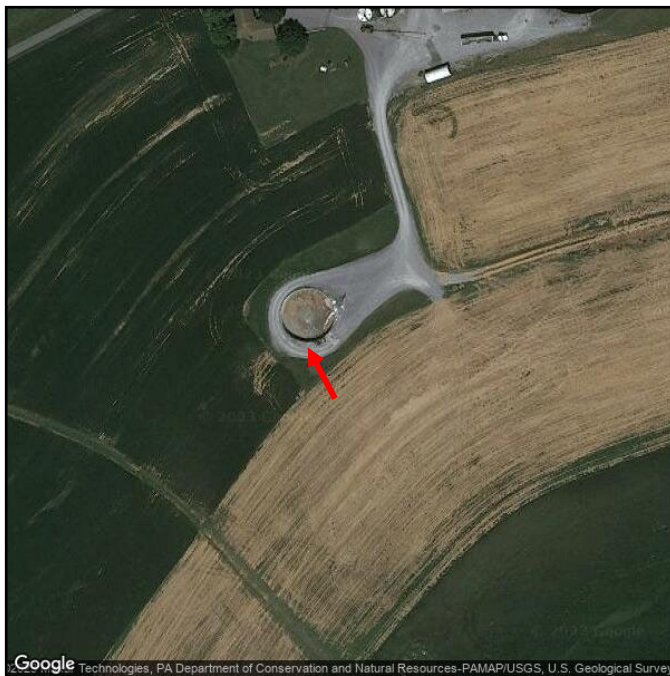
Description	Spillage on the concrete area adjacent to Tank P1.
-------------	--

DSCN5047.JPG

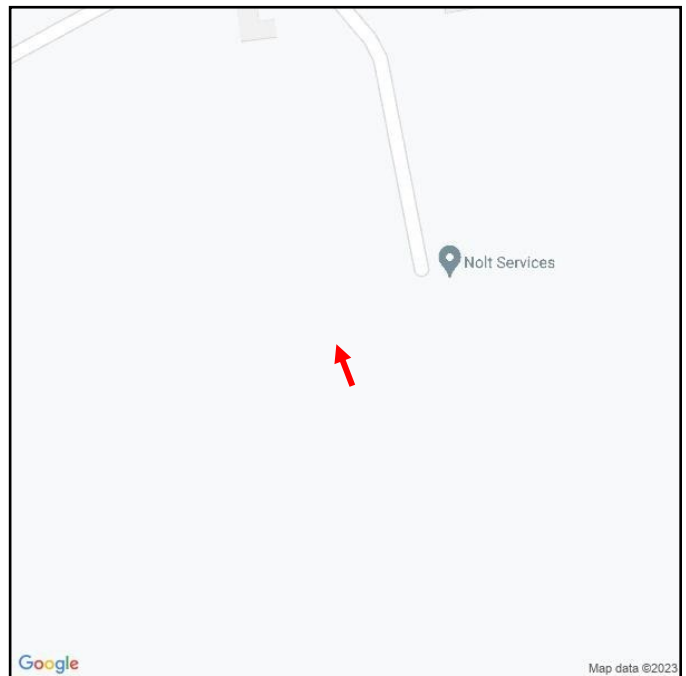


N 40° 11' 10.07"
W 76° 12' 29.52"

2/5/2023 2:56:45 PM



Google Technologies, PA Department of Conservation and Natural Resources-PAMAP/USGS, U.S. Geological Survey



Google Map data ©2023

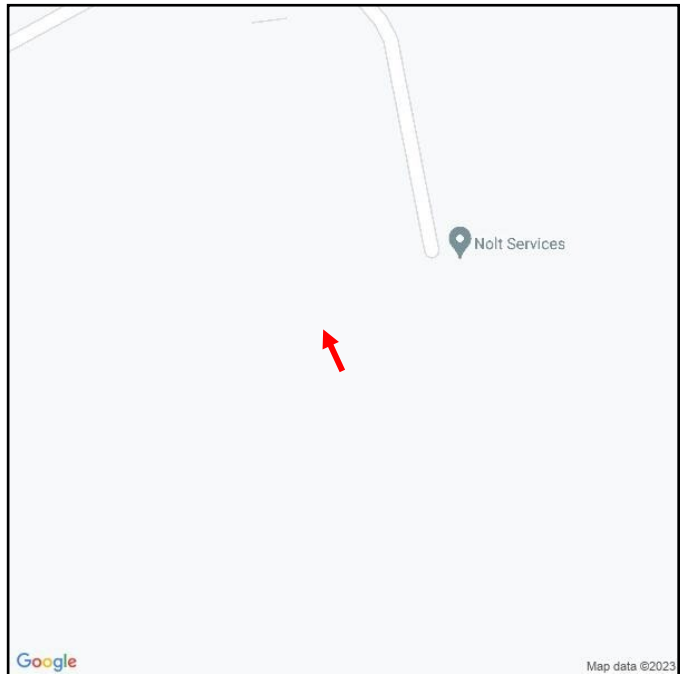
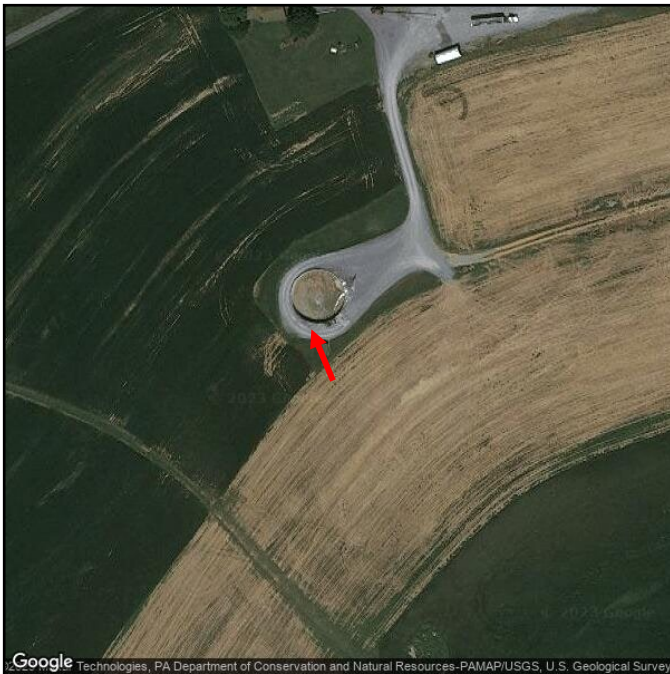
Description	Spillage on the concrete area adjacent to Tank P1.
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DSCN5048.JPG



N 40° 11' 09.85"
W 76° 12' 29.73"

2/5/2023 2:56:57 PM



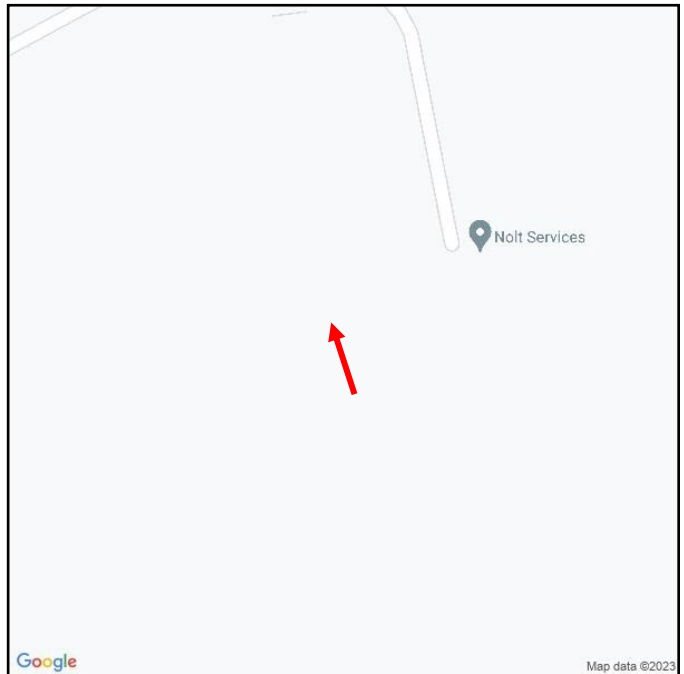
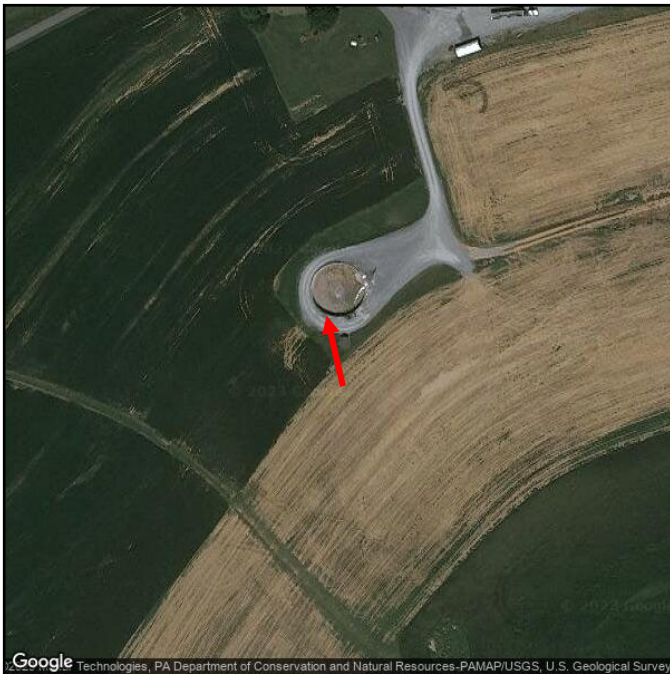
Description	Solids and grit removal machine adjacent to Tank P1.
-------------	--

DSCN5049.JPG

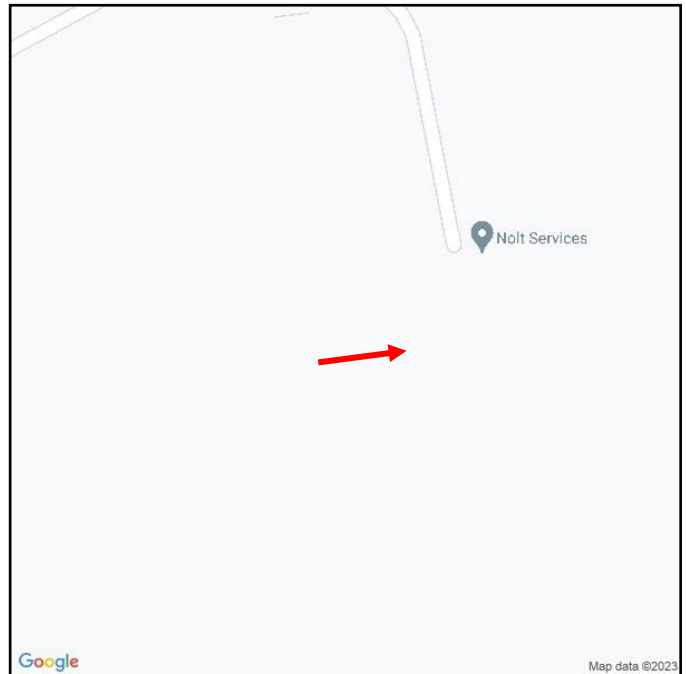
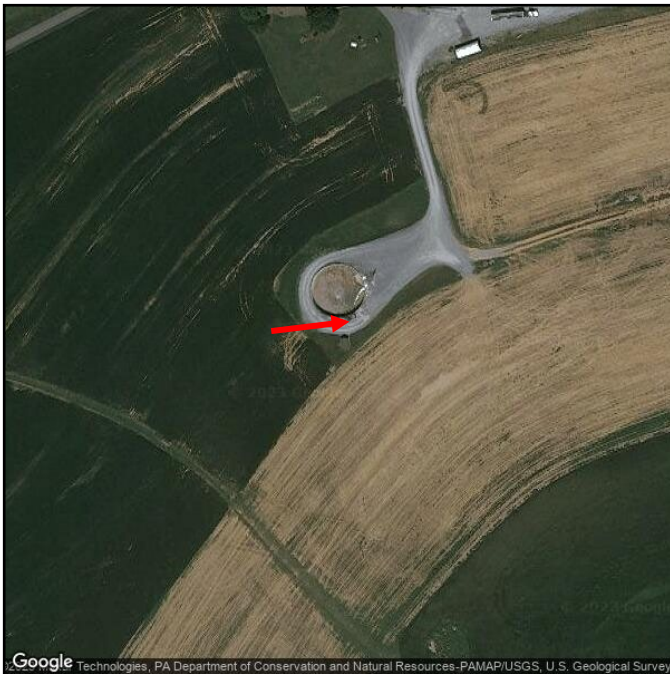


N 40° 11' 09.77"
W 76° 12' 30.07"

2/5/2023 2:57:10 PM

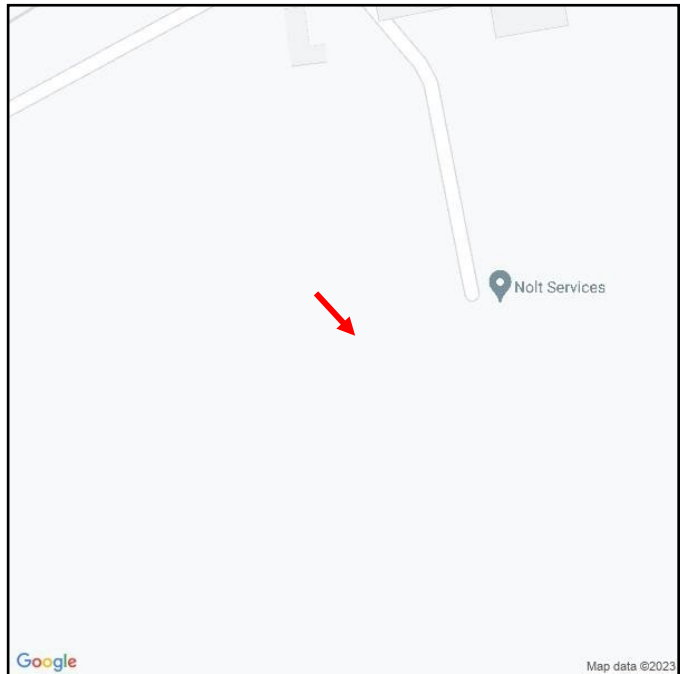
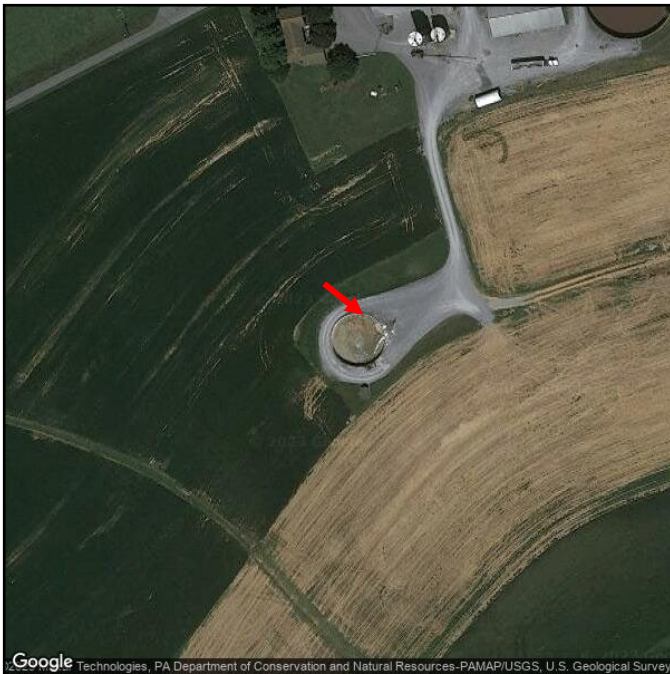


Description	Pumping equipment for Tank P1.
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Description	Solids and grit removal machine adjacent to Tank P1.
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DSCN5051.JPG



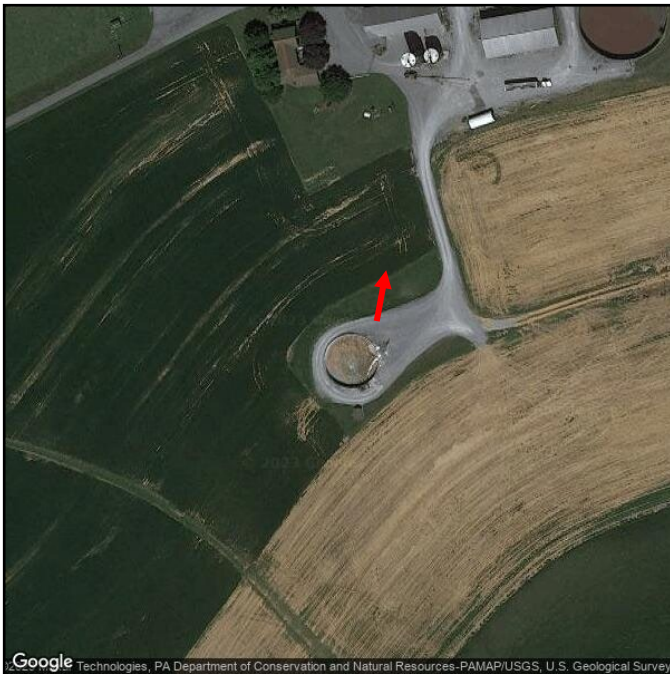
Description	Tank P1 in the south area of the Facility.
-------------	--

DSCN5052.JPG

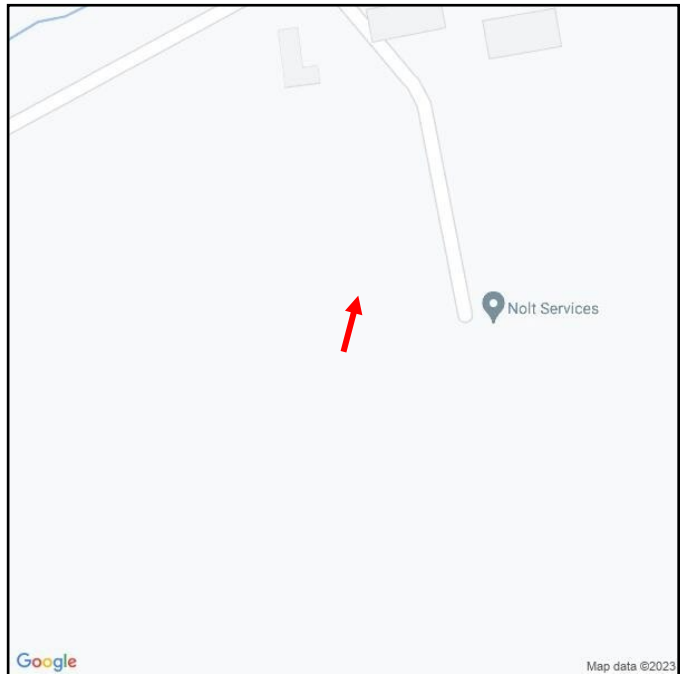


N 40° 11' 10.70"
W 76° 12' 30.32"

2/5/2023 2:58:08 PM

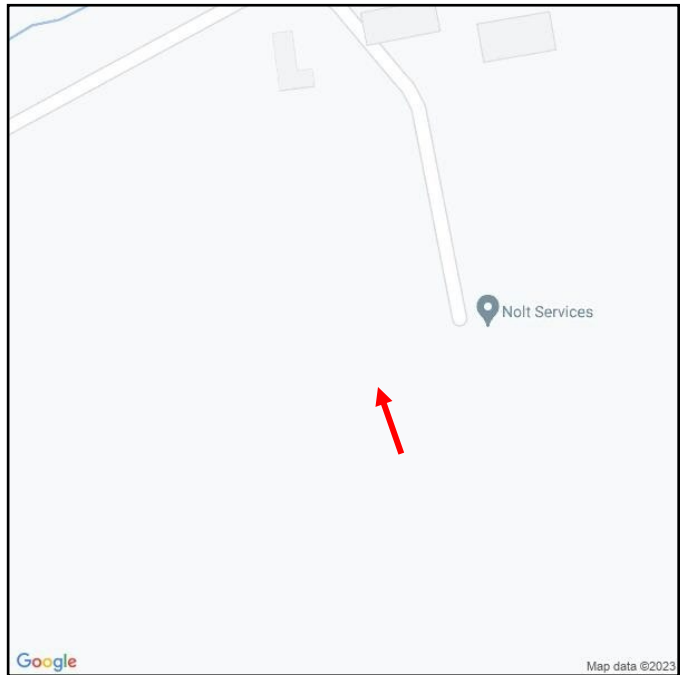
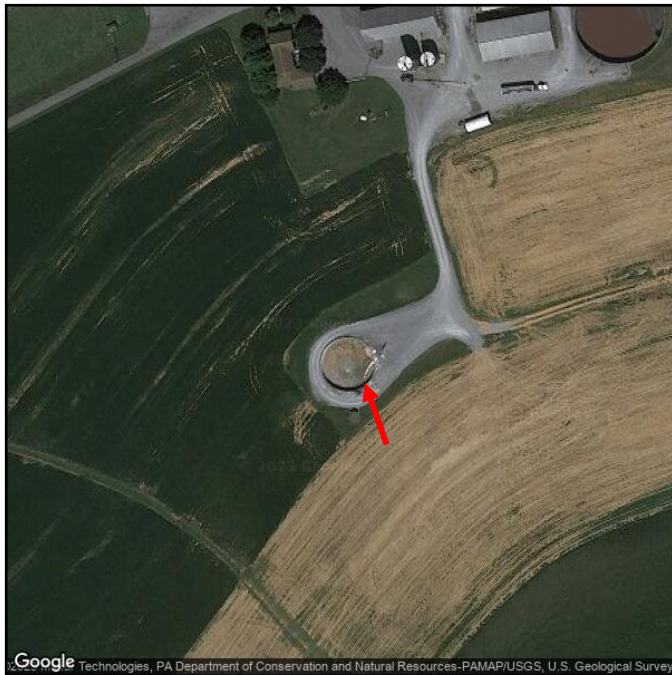


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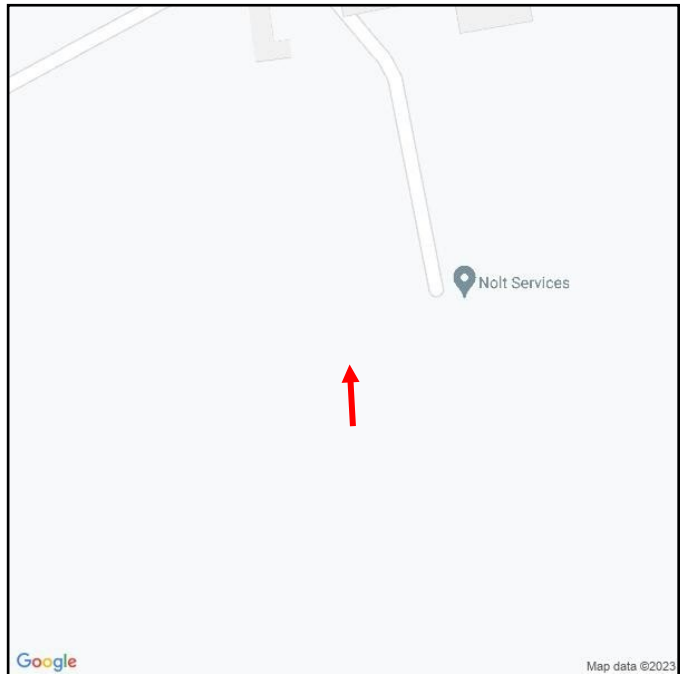
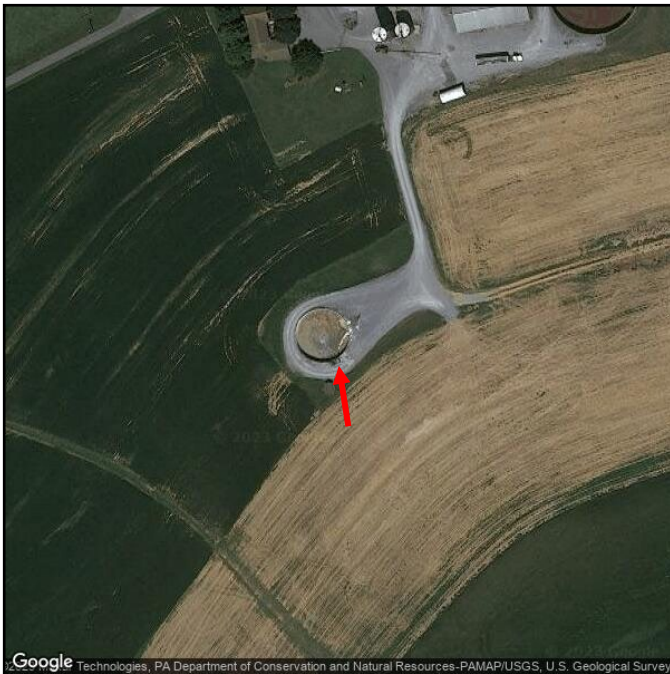


Google Map data ©2023

Description	Slope leading away from Tank P1.
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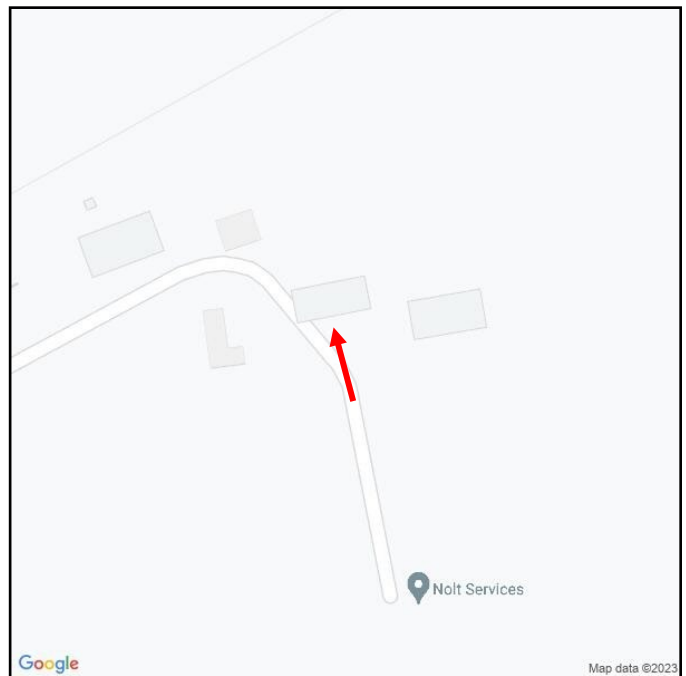
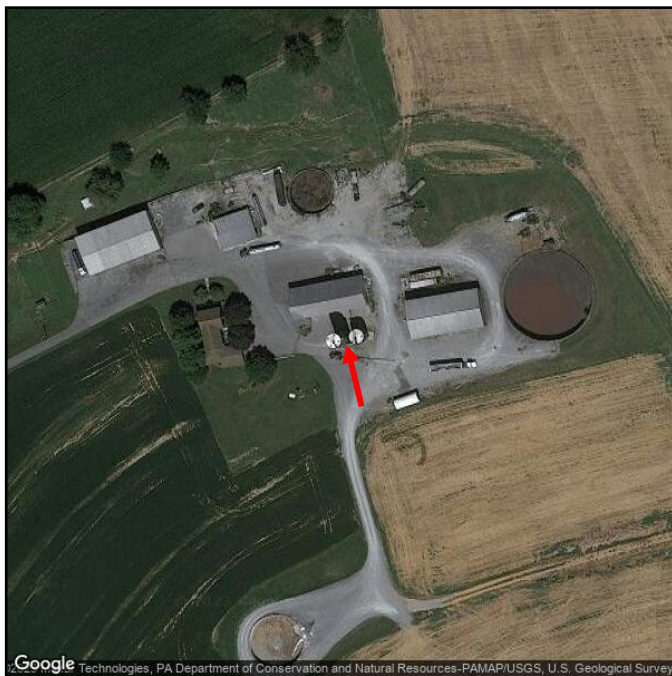
Description	Solids and grit removal machine adjacent to Tank P1.
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Description	Spillage on the concrete surface adjacent to Tank P1.
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Description	View, facing southwest, of spilled lime on the ground adjacent to Tank P1.
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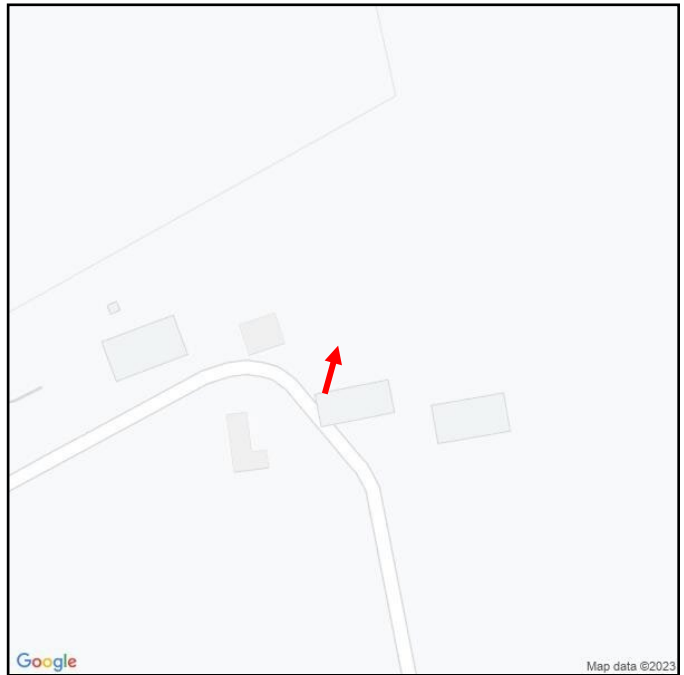


Description	Approximate 750-gallon fuel container for farm use.
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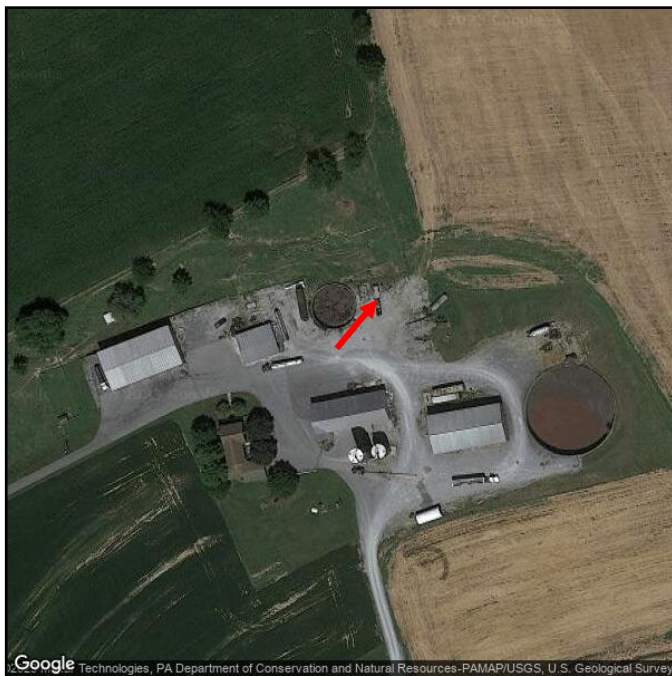
Description	View, facing northeast, of Tank P2.
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DSCN5059.JPG



Description
Spillage on the ground adjacent to Tank P2.

DSCN5060.JPG



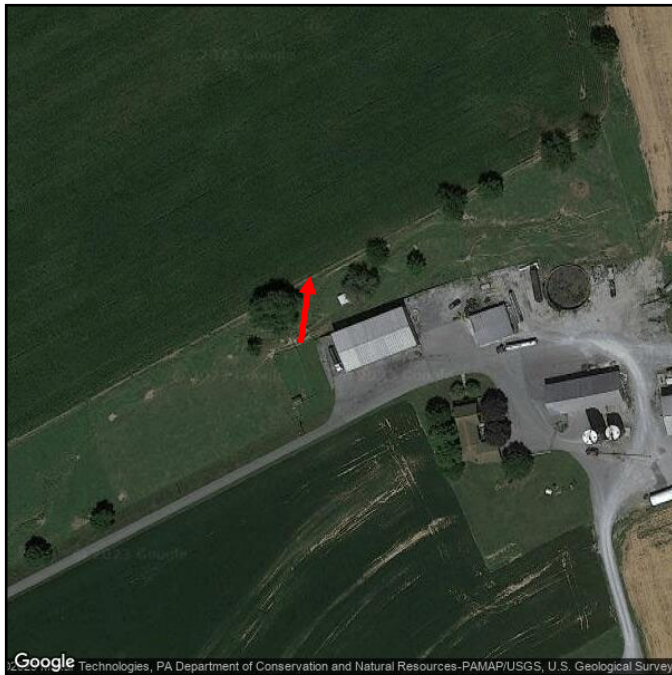
Description	Spillage on the ground adjacent to Tank P2.
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Description	Downgradient view of Meadow Run.
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Description	Upgradient view of Meadow Run to the north of a small white shelter.
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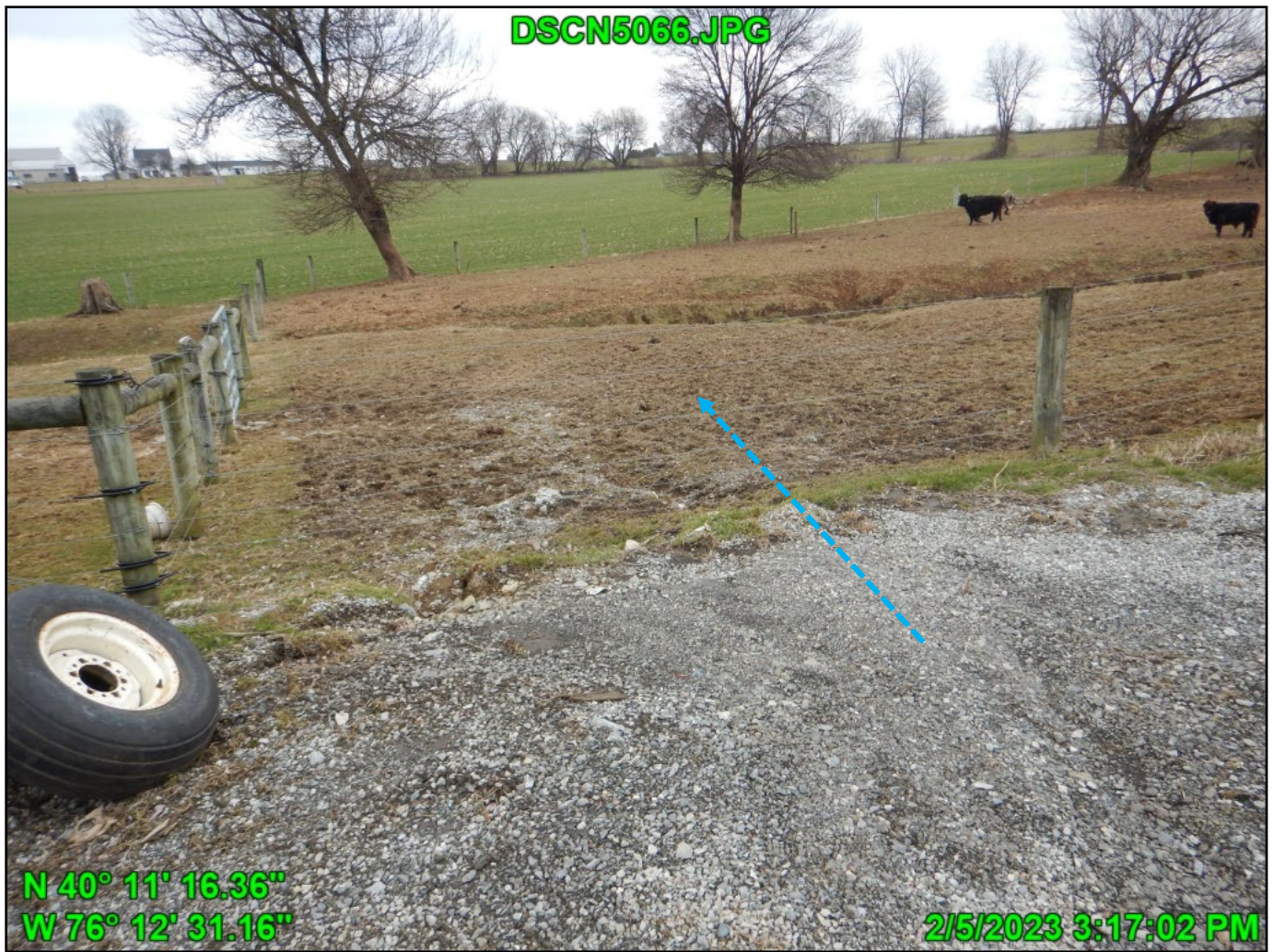
Description	Upgradient view of Meadow Run.
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Description	Downgradient view of Meadow Run flowing from the east to the west.
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Description	Direction of sloping terrain from the area adjacent to Tank P2 towards Meadow Run.
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Description	Direction of sloping terrain from the area adjacent to Tank P2 towards Meadow Run.
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Description	Meadow Run headwaters and Facility trucking equipment.
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DSCN5068.JPG



N 40° 11' 16.31"
W 76° 12' 31.12"

2/5/2023 3:17:09 PM



Description
View of Facility trucking equipment.