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June 10, 2026

Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Food Processing Residual (FPR) Management in Plumstead Township

To Whom It May Concern:

As solicitor for Plumstead Township, I have been asked to convey the Township's cooperation with and appreciation for the Department of Environmental Protection's recent inspections and enforcement actions regarding the handling and land application of Food Processing Residual at 7060 Groveland Road. The Township has heard significant concerns from residents living near the property, and we believe it is important to share those concerns with the Department while also reaffirming our longstanding support for agriculture.

Plumstead Township is home to a robust farming community, and the Township has long supported agricultural operations, including those located within Agricultural Security Areas. We recognize that FPR spreading, when properly managed, is a lawful practice under Pennsylvania law. We also recognize that the Commonwealth's best management practices manual for FPR dates to 2001 and that the General Assembly is currently reviewing the broader statutory framework through House Bills 586 and 587. The Township appreciates that the Department continues to apply and enforce the existing regulatory standards while the legislature considers potential updates.


At the same time, the Township has an obligation to ensure that agricultural and related activities within its borders comply with state law and do not create conditions harmful to public health, safety, or the environment. The Department's April 30, 2026 and May 13, 2026 Notices of Violation and subsequent inspections documented failures to implement required best management practices, failures to control odors and vectors, and an unpermitted discharge of FPR leachate to a tributary of Geddes Run. These findings have understandably caused concern among nearby residents, who rely on the Department's oversight to ensure that FPR is handled in a manner consistent with the Solid Waste Management Act, the Clean Streams Law, and the residual waste regulations.

The Township does not seek to impede lawful agricultural operations, nor does it wish to contribute to unnecessary burdens on farmers. Our goal is simply to ensure that all parties—residents, farmers, and the Township—can rely on a consistent and enforceable regulatory process. We respectfully request that the Department continue its oversight of the activities at 7060 Groveland Road and ensure that all corrective actions required under the Notices of Violation are completed and maintained. The Township will continue to cooperate fully with the Department and will enforce its own ordinances and conservation easements to the extent they apply.

We appreciate the Department's attention to this matter and its ongoing efforts to balance the needs of agriculture with the protection of public health and the environment. Please feel free to contact the Township should additional information or coordination be helpful.

Very truly yours,

GRIM, BIEHN & THATCHER

By: 
William D. Oetinge