



Eastburn and Gray, PC

Attorneys at Law

John A. VanLuvanee

60 East Court Street

P.O. Box 1389

Doylestown, PA 18901

215-345-1342

215-345-9142 - fax

jvanluvanee@eastburngray.com

June 18, 2026

Via email

William D. Oetinger, Esquire

Grim, Biehn & Thatcher

104 South 6th Street

P.O. Box 215

Perkasie, PA 18944

**RE: Notice to Cure – Stipulated Settlement Agreement
Plumstead Township v. Kingdom Provisions, et al, No. 2024-04356**

Dear Will:

This letter is written in response to your June 5, 2026, correspondence in which you, on behalf of Plumstead Township, allege that Kingdom Provisions is in violation of multiple obligations under its Settlement Agreement with Plumstead Township. As you state in your letter, those allegations were based upon the General Inspection Report dated June 2, 2026, issued by PA DEP.

Kingdom Provisions responded to the June 2, 2026, letter on June 8, 2026. Note that Plumstead Township was copied on the email response. A copy of the response is enclosed. In the email response, Kingdom Provisions asserts that it was not in violation of any of the regulations cited in the June 2, 2026, letter. The response contains an explanation of the facts and circumstances based upon which Kingdom Provisions asserts that none of the conditions observed by Mr. Majeed on June 2, 2026, were in violation of any of the cited DEP regulations.

On June 16, 2026, Mr. Majeed performed a follow-up inspection. A 6-page Inspection Report prepared following that inspection is attached. The Report concludes by stating that no composting, FPR wastewater application or odors were observed and, most significantly, states “No violations noted.”

In your June 5 letter, you state that the findings contained in the June 2, 2026, General Inspection Report constitute violations of the Stipulated Settlement Agreement. As indicated above, Kingdom Provisions does not

William D. Oetinger, Esquire

June 18, 2026

Page 2 of 2

believe that the conditions observed by DEP on June 2, 2026, constituted a violation of any applicable regulations. To the extent that there were any violations in existence on June 2, Mr. Majeed's follow-up Inspection Report on June 16 confirms that the observed conditions had been corrected within two weeks of the date of the letter and, accordingly, had been corrected within the 14-day cure period provided under the Stipulated Settlement Agreement.

Kingdom Provisions is and, in its opinion, has been in compliance with the terms of the Stipulated Settlement Agreement.

Very truly yours,



John A. VanLuvanee

JAV/eah

Enclosures

Cc: Diane M. Ellis-Marseglia,
Bucks County Board of Commissioners Chair
Daniel D. Grieser, Esquire, Bucks County Solicitor
Gina Thomas, Esquire, Department of Environmental Protection
Stacy Mulholland, Plumstead Township Manager
Steve Hicks, Plumstead Township Assistant Manager

John A. VanLuvanee

From: Kingdom Provisions <kingdomprovisions22@gmail.com>
Sent: Monday, June 8, 2026 4:55 PM
To: John A. VanLuvanee
Subject: Fwd: Kingdom Provisions LLC - Notice of Violation

----- Forwarded message -----

From: **Kingdom Provisions** <kingdomprovisions22@gmail.com>
Date: Mon, Jun 8, 2026, 4:54 PM
Subject: Re: Kingdom Provisions LLC - Notice of Violation
To: Majeed, Bedhr <bmajeed@pa.gov>
Cc: Ted Bootie <tmcustomservices@gmail.com>, Bower, Jonathan <jobower@pa.gov>, Bauer, Kevin <kbauer@pa.gov>, Mountain, Shawn <smountain@pa.gov>, <info@plumstead.gov>

Good afternoon ,

Last week, Kingdom Provisions received a report of the inspection conducted by Bedhr Majeed on Tuesday, June 2, 2026, between the hours of 7:30AM and 12PM. In the report, Mr. Majeed alleges that the “storage of butchering waste” as described in his report was contrary to 5 regulations applicable to the storage of butchering waste. As requested, this letter constitutes the written response of Kingdom Provisions, LLC to the alleged violations.

First, Kingdom Provisions does not believe that it was in violation of any of the cited regulations. To the extent Kingdom Provisions is prepared to take action in response to the report, such actions are taken without prejudice to our contention that none of the conditions were sufficient to constitute a violation of the cited regulation.

Kingdom Provisions has a contract with Holley Containers to pick up our waste products. We are contracted to have a pick-up every Monday morning. On Monday, June 1, Holley Containers came to the site but did not dump the two containers that are described in Mr. Majeed’s report. We were advised that the containers were too heavy to be picked up. I established that that was not the case by loading the containers onto my trailer and taking them to a weigh station. Neither of the containers was overloaded. The two pull-along wagons described in the last paragraph of page 2 of Mr. Majeed’s report contain materials that were waiting to be deposited in the Holley containers as soon as the containers were dumped. As noted in photograph #5, they were tightly covered.

During the morning of Mr. Majeed’s visit, the slaughterhouse was in active operation. All of the activities described in the report were taken in the ordinary course of business and do not evidence the storage of

residual waste. The 26-foot top load trailer that Kingdom Provisions utilized is not utilized for the purpose of storing FPRs. It is loaded, covered with a mesh cover and transported to an appropriate disposal site. To the best of my knowledge, there is no regulations that a sold vinyl tarp be utilized. We have been utilizing this mesh cover for several years and have never been advised that there is any issue with it.

With regard to the assertion that the trailer was leaking, Kingdom Provisions' normal practice is to put the trough behind the truck so that any leaking material that is generated during the time period that the trailer is being loaded for disposal is captured by the trough and discharged directly into a storage tank, as described by Mr. Majeed in the second paragraph on page 2 of his report. Normally, we tilt the bed of the trailer for the purpose of permitting the leakage from the truck into the trough and then into the storage facility, so that there is no leakage that occurs during the course of transporting the filled trailer to a disposal site. Without prejudice to our contention that the existing trailer is not in violation of any regulations, we will install a new seal on the tailgate of the trailer to ensure no leakage occurs.

With regard to the two containers shown in photograph #3, those are two of many such containers that are used every day in the slaughtering process. As the slaughtering occurs and containers are filled inside the slaughterhouse, they are placed outside on the concrete pad (as shown in photo #3) and promptly dumped into the trailer by our loader. Those containers never sit on the concrete surface for more than 30 minutes. The leaking container has been taken out of service.

I hope that this explanation will be sufficient to establish that Kingdom Provisions was not operating in violation of any applicable regulation.

Sincerely

Ephraim

On Thu, Jun 4, 2026, 1:48 PM Majeed, Bedhr <bmajeed@pa.gov> wrote:

Good evening,

Please find attached a Notice of Violation (NOV) issued to Kingdom Provisions LLC from the latest DEP inspection conducted on 6/2/2026.

Within three (3) days of receipt of this notice, please submit a written report to DEP addressing the cause and correction of the violations listed in the NOV.

Best,

Bedhr Salam Majeed | Solid Waste Specialist
Department of Environmental Protection | Southeast Regional Office

[2 East Main Street | Norristown, PA 19401](#)

Phone: 484.250.5766

www.dep.pa.gov<<http://www.dep.pa.gov/>>

General Inspection Report

Permit Number	----	EPA ID Number	----
Facility Name	KINGDOM PROVISIONS LLC	Operator Name	----
Address	----	Address	----
City/State/Zip	----	City/State/Zip	----
Municipality	----	County	----
Responsible Official	Ted Bootie	Title	Operations Manager
Person Interviewed	Ted Bootie	Title	Operations Manager
		Telephone #	(223) 363-0242
Lead Inspector	BEDHR MAJEED	Title	Solid Waste Specialist
Site ID	0	Client ID	377262
PF ID	----	SF ID	----
Inspection Start Date	06/16/2026 12:30 PM	Inspection End Date	06/16/2026 02:00 PM
Inspection Type	FUI - Follow-up Inspection	Inspection Result	No Violations Noted
Permit Expiration Date	----	Days/Week Operated	6
		Max. Daily Volume	----

Comments

On Tuesday, June 16th, 2026, I, Bedhr Salam Majeed, Solid Waste Specialist, conducted a follow up inspection for Kingdom Provisions (KP) located at 5960 Durham Road, Plumstead Township, Pipersville PA. This inspection was also a response to a complaint (CTS ID: 398092) on the report of strong decomposition odors. Weather conditions during the inspection were sunny with a temperature of 68F, winds at 6 mph from the N.

Prior to arriving on site, the surrounding area was surveyed for odors. This was done by driving from East and West on Durham Road. No odors were detected on Durham prior to arrival.

A response to the violations noted on DEP waste management 6/2/2026 inspection report was received on 6/8/2026 from Mr. Ephraim Stoltzfus – property owner. A notice of violation (NOV) was issued to KP on 6/9/2026 for the violations observed on 6/2/2026.

The focus of this inspection was on the south side of the facility. Upon arrival, I was greeted by Mr. Ted Bootie who granted access to the site. Pumping of the underground storage tank was ongoing during this inspection. No odors were observed around the tanker truck being pumped into. No leaks were observed in the hose or tanker truck. Per Mr. Bootie the tanks were being agitated with a pressure wash system to collect solids which will help reduce odors on site. No containers filled with skins of processed animals were observed at this time. Active loading of FPR material from the chutes on the backside of the facility was observed. One trailer with FPR material intended for composting was observed on site, this trailer is transported offsite every two days for composting at Lancaster and Berks County farms. No signs of leaks or depositing of residual waste were observed around the perimeter of the trailer. The trough used to collect leaking waste was observed dry at this time. No depositing of waste was observed around the trough area leading into the underground storage tank on site. No odors were observed around the trailer being loaded. At the underground FPR storage tank opening, no odors were observed emanating from the tank as the manhole cover was placed securely overtop. Two 8yd top load dumpsters provided by Holly container service were observed with proper closure and no signs of leaks or odors. Mr. Bootie stated bulk bones and hooves are disposed of in the municipal 8yd top load waste containers on site.

The DEP has requested the required best management practice (BMP) record keeping documents for the transportation of all FPR material to the Lancaster and Berks County sites. The DEP also requested all previous BMP record requirements for the composting operation at the Shull Farm for the period that KP had been utilizing the Shull Farm approximately August 1st, 2024, to April 23rd, 2026. Record keeping is required by the department's BMP manual. Mr. Bootie states these documents will be made available within a week of my request. At the time of this inspection report the requested documents have not been received.

Upon conclusion of this inspection no composting, FPR (food processing residual) wastewater application or odors were observed. Visual observations also confirmed no signs of turkey vultures were present on the property.

No violations noted.

INSPECTION IMAGES



Photo #1 Hose leading inside to underground storage tank.



Photo #2 8yd top load containers on site.



Photo #3 No signs of spills or staining in driveway area.



Photo #4 Trailer holding FPR with trough for draining into underground storage tank.



Photo #5 Manhole cover over underground storage tank opening.

Inspection Report Signature Page

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

Signatures

Person Interviewed	Unable To Obtain Reason: Delivered Electronically	Date	--/--/----
Inspector		Date	06/18/2026