



martin and martin, incorporated

37 South Main Street • Suite A • Chambersburg, Pennsylvania • 17201-2251
Phone: (717) 264-6759; Fax: (717) 264-7339; Website: martinandmartininc.com

November 10, 2025

PaDEP – Northeast Regional Office
Attn: David F. Matcho, P.E.
Environmental Engineer Manager
2 Public Square
Wilkes-Barre, PA 18701-1915

RE: 2nd Technical Deficiency Letter
Permit Renewal Application
Blythe Recycling and Demolition Site (BRADS)
Landfill
Application # 101679-A241
APS ID # 1106245, Auth ID # 1470869
Blythe Township, Schuylkill County
Response to letter from PADEP dated 9/19/2025
Our file: b/1312.3/RL09192025

Dear Mr. Matcho,

Please find below BRADS Landfill's responses to your letter dated September 19, 2025 regarding the referenced plan. Responses are provided in **bold** for clarity.

Deficiencies

1) Trucks over 10 tons entering the facility from the West (Approach Route #2)

The facility plan requires all vehicles—except those delivering waste generated within St. Clair Borough—to enter from the East (Approach Route #1). The Department continues to receive complaints about vehicles over 10 tons using the West approach through St. Clair Borough. Please provide additional measures to ensure compliance.

Response:

The Traffic Compliance Plan has been updated to explicitly require all waste vehicles over 10 tons, other than St. Clair waste, to enter via the East approach (Route #1). Site personnel will conduct random observations of incoming vehicles to verify compliance (see Attachment A).

2) Unsafe trucks utilizing the facility

Please provide details on measures addressing this issue, including whether sanctions will be applied to haulers cited for safety violations.

Response:

BRADS is committed to promoting compliance with all transportation safety laws. We will collaborate with local and state law enforcement to enforce these laws and encourage on-site enforcement activities. The Traffic Compliance Plan has been updated accordingly (see Attachment A). Additionally, letters have been sent to both the PA State Police at the Frackville barracks and the Blythe Township Police encouraging them to set up as needed, at the BRADS facility for enforcement inspections (see Attachment B).

3) Air Quality violations regarding the H₂S control system and landfill odors on Burma Road

Please provide a detailed plan to address air quality violations and odor concerns, including any operational changes, control technologies, or equipment upgrades.

Response:

In addition to the flare blower and H₂S treatment system installed in 2024 (as noted in our April 16, 2024 PADEP response), BRADS has implemented several enhancements to improve landfill gas management and odor control:

- **Installation of five vertical gas extraction wells, one leachate collection pipe LFG extraction well, and multiple horizontal collection wells.**
- **Increased media changeout frequency in the H₂S treatment system through proactive vendor coordination and maintaining on-site replacement media to minimize downtime.**
- **System flexibility improvements via piping and fittings that allow operation in parallel or lead-lag configurations. The system currently operates in lead-lag mode to ensure continued treatment after breakthrough in the lead vessel.**

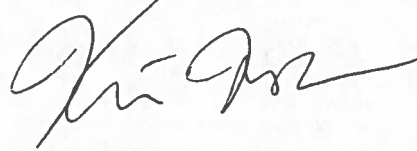
Recent monitoring shows flare inlet H₂S concentrations well below the 3,670 ppmv limit, with some readings at non-detect levels. Weekly monitoring of system inlet, outlet, and blended landfill gas header will continue. Media changeout downtime will be limited to less than 24 hours whenever practical.

Sulfur dioxide emissions remain significantly below the permitted annual limit of 100 tons. These measures collectively strengthen compliance, enhance odor control, and maintain operational reliability.

Mr. Matcho
November 10, 2025
Page 3

If you have any questions regarding this correspondence, please contact our office at your convenience.

Very truly yours,
MARTIN AND MARTIN, INCORPORATED

A handwritten signature in black ink, appearing to read 'Kevin Bodner', written over the company name.

Kevin Bodner

cc: Blythe Township (via email: blythetwp@verizon.net)
Schuylkill County (via email: bhetherington@co.schuylkill.pa.us)
Schuylkill County Planning Commission: via email: ssmith@co.schuylkill.pa.us)

ATTACHMENT A

Revised Traffic Compliance Plan

**BRADS LANDFILL
SCHUYKILL COUNTY, PENNSYLVANIA**



WASTE CONNECTIONS INC.
Connect with the Future®



**TRANSPORTATION
COMPLIANCE
PLAN**

November 2025

BRADS TRANSPORTATION COMPLIANCE PLAN

I. TRANSPORTATION COMPLIANCE PLAN

BRADS site is committed to working with the owner/operators of construction and demolition waste transportation vehicles in an effort to continually improve waste transportation safety and environmental compliance. In support of this effort, BRADS has developed and will implement a Transportation Compliance Plan, which will be disseminated to the owners/operators of waste transportation vehicles that deliver waste to the facility. This plan will also be maintained on file at the facility. BRADS is a construction and demolition waste site. Upon arrival at the facility, waste transportation vehicles are required to first proceed to the scale upon entering the facility. At the scale, the Weighmaster records all the pertinent information regarding the waste delivery, customer name, truck number, gross vehicle weight, waste type and origin. The Weighmaster will also inspect all waste transportation vehicles and trailers for compliance with the Act 90 Waste Transporter Authorization Program. All BRADS equipment operators are trained for, among other things, waste acceptance procedures.

II. TRAINING AND EDUCATION

BRADS will participate in transportation and vehicle safety programs offered by DEP and the Pennsylvania Department of Transportation (PennDOT). Literature provided by DEP or PennDOT will be distributed to all customers, and where appropriate, incorporated into BRADS Transportation Compliance Plan. Further, BRADS will provide handouts to customers listing the hauler rules and regulations. BRADS will distribute the Transportation Compliance Plan to all new customers. Through these measures, BRADS will help educate all customers on the transportation regulations listed in PA Code Title 25 Environmental Protection Chapters 271-285.

III. STRATEGIES TO ASSIST IN COMPLIANCE

BRADS will implement operational controls to address Transportation Compliance. First, BRADS will require that all waste vehicles over 10 ton use the I-81, Mahanoy City route to enter and exit the facility. Exclusive use of the Mahanoy City exit eliminates the concern with such trucks traveling through the Borough of St. Clair. This designated Approach Route for waste vehicles also eliminates other potential nuisances and concerns, as there are no occupied dwellings along this segment of Burma Road and general use of this high-quality state roadway is limited as BRADS has entered into an Excess Maintenance Agreement with PennDOT effective 12/23/2022. The operating procedures requiring use of the Approach Route will be enforced by the facility by performing random observations of incoming waste vehicles and, if necessary, by the Blythe Township police department. Under these procedures, if a waste vehicle enters from the opposite direction, the driver will be issued a written notice and the vehicle will be placed in a holding area for a minimum of 3 hours prior to dumping. (Written notices and placement in the holding area will also be imposed for vehicles without proper cover over the waste, and violation of on-site operational procedures.) If a driver receives three (3) written notices for rule violations the driver will be prohibited from using the BRADS landfill for a period of one (1)

working day. Each additional infraction thereafter will result in a one (1) day suspension during the month when the violation is accrued. BRADS reserves the right to impose longer periods of suspension, including permanent suspensions for repeated and significant violations. In addition, BRADS will create a queuing/parking area near the scale of the facility for any early arriving vehicles. As a result, such vehicles will stage at an area away from the Burma Road. A file will be maintained on site that includes copies of the inspection forms and any documentation BRADS has accumulated due to this Transportation Compliance Plan. The Transportation Compliance Plan will be re-evaluated on a regular basis in order to determine its effectiveness. If this evaluation reveals that waste transportation vehicles are entering the facility on a routine non-compliant basis, then revisions to the program will be made and enforcement measures will be enhanced.

IV. COMPLIANCE CHECKS

Waste transportation vehicles will be checked at the scale house by the Weighmaster on a routine basis for the following: (1) gross vehicle weight, (2) tarps, (3) leaky loads, (4) load securement, (5) signage, and (6) Act 90 Stickers. Random inspections of waste transportation vehicles will be conducted. Vehicles will be asked to pull off the scale and a thorough inspection will be conducted. In addition to the above items, the vehicle will be checked for the following: (1) fire extinguishers, (2) transporter's daily operational record, and (3) residual waste contingency plan.

V. INSPECTION FORM

BRADS utilizes a three (3) part Truck Inspection Form (Attachment 1) during the compliance checks when a violation is noted. Both the driver of the waste transportation vehicle and the person conducting the inspection will be required to sign the inspection form. A copy will be supplied to the driver and the transportation company, and a copy will be maintained in the scale house.

VI. WARNINGS

Local waste transportation vehicles will be inspected in accordance with the compliance checks listed above. A warning will be issued to the driver of the waste transportation vehicle and the transportation company in the form of the three (3) part inspection form whenever there is a violation found. Overweight vehicles are currently a common occurrence at the landfill facility with some overweight vehicles being minor while others are more significant. BRADS believes that all our customers and their haulers should comply with the legal requirements imposed by government transportation authorities. The purpose of these requirements is the protection of the public from injury and the public roads from damage. To encourage compliance a charge for overweight loads crossing the scales at the BRADS landfill shall be implemented in the manner as set forth in the attached Notice of Violation Surcharge (Attachment 2). BRADS will no longer consider waiving any penalties due to a "declaration of emergency". Blythe Township will use the proceeds of overweight charges for the benefit of the local community. Charges will be included on the weekly invoice and are payable by the recipient. A copy of the NOV Surcharge form will be provided to the driver, a copy will be supplied to the transportation company and another copy will be maintained in the scale house files. To further encourage weight compliance, Vehicles arriving overweight for their first violation will be placed in a holding area for a minimum of 1 hour and a second violation will be

placed in a holding area for a minimum of 2 hours and a warning issued to the driver of the waste transportation vehicle and the transportation company. Upon the third violation, in addition to the previous penalties, the driver of the vehicle will not be permitted back on site for one (1) working day. Each additional infraction thereafter will result in one (1) day suspension during the month when the violation is accrued. BRADS reserves the right to impose longer periods of suspension, including permanent suspensions for repeated and significant violations. All vehicles and drivers exceeding 3% of the gross vehicle weight will not be permitted back on site for three (3) working days. This program will be evaluated and revised as needed.

BRADS will ensure that as regulations change and as new information is available that the scale attendant is kept up to date and has this information readily available for all the owner/operators of waste transportation vehicles that utilize the facility. In addition, all waste transportation vehicles will be inspected to ensure that they are in compliance with the Act 90 Waste Transportation Authorization Program. If a waste transportation vehicle or its trailer meets the Act 90 criteria and is not registered with the DEP they will not be permitted to utilize the facility.

VII. TRUCK SAFETY

In addition to the random inspections of waste transportation vehicles as noted in IV, BRADS will work fully with local and state law enforcement to further encourage waste transportation vehicles utilizing BRADS are in full compliance with required safety laws. This includes encouraging law enforcement to set up on-site to enforce safety laws.

Attachment 1

BRADS TRUCK INSPECTION

Date _____ Ticket No. _____ # Violations _____

Customer: _____

Address: _____

Telephone: _____

Driver: _____

VIOLATIONS

- ☐ Gross weight vehicle exceedance - 277.311 (b) (11)
- ☐ Load must be completely covered during transportation - 285.211 (a)
- ☐ There shall be no release or leakage of waste during transportation - 285.213 (c)
- ☐ Loads in vehicles shall be secured to prevent any of the load from escaping - 285.214 (b)
- ☐ Signs on transportation vehicles must include: name, city, state and zip code - 285.218 (1)
- ☐ Signs must include specific type solid waste transported (6" height) - 285.218 (2) and (3)
- ☐ Transportation equipment shall be equipped with fire extinguisher - 285.213 (a)
- ☐ A daily operation record needs to be maintained in the cab of each vehicle - 285.217
- ☐ Residual waste transporters shall have safety equipment available - 299.216 (a)
- ☐ Other - _____

Driver: _____

Weighmaster: _____

Date: _____

Date: _____

Attachment 2

Notice of Violation Surcharge

BLYTHE TOWNSHIP

Overweight Vehicles

The Pennsylvania Department of Environmental Protection ("Department") oversees overweight truck records from the Blythe Recycling and Demolition Site (BRADS) located in Blythe Township, Schuylkill County. Waste transportation vehicles exceeding the statutory maximum gross vehicle weights are a hazard to public safety. The BRADS facility is committed to working with owner/operators of Construction and Demolition waste transportation vehicles in an effort to continually improve waste transportation safety and environmental compliance.

To that end, Pennsylvania Code, 75 Pa. C.S. § 4941 states 'Maximum gross weight of vehicles (a)General rule.-- Except as provided for in subsection (d), no vehicle shall, when operated upon a highway, have a gross weight exceeding 80,000 pounds, and no combination driven upon a highway shall have a gross weight exceeding 80,000 pounds, or the applicable weight set as forth in subsection (b) or (c), whichever is less.'

ADVISE OF LIMITS

When a commercial motor vehicle exceeds the maximum gross weight as identified by a BRADS Weighmaster, the following tier structure will apply:

Tier 0 ☐ 80,001 – 82,400 lbs. GVW \$200.00 Surcharge

Tier 1 ☐ 82,401 – 84,999 lbs. GVW \$300.00 Surcharge

Tier 2 ☐ 85,000 – 89,999 lbs. GVW \$500.00 Surcharge

Tier 3 ☐ 90,000+ lbs. GVW \$1,000.00 Surcharge

TOWNSHIP RESOLUTION

The Board of Supervisors of Blythe Township, Schuylkill Township, Pennsylvania authorizes the Overweight Vehicle Surcharge to be assessed at the Blythe Recycling and Demolition Site (BRADS) by decree of Resolution #2024-05.

STRUCTURED PENALTIES

- November 7, 2024 – Grace Period
- November 8, 2024 – Surcharge in Effect

Payments for surcharges are for the benefit of the local Blythe Township community.

Customer: _____ Driver: _____ Weighmaster: _____

Date: _____

Please make payments to:

BLYTHE TOWNSHIP SUPERVISORS
P.O. BOX 91
CUMBOLA, PA 17930

ATTACHMENT B

Letters to the PA State Police & Blythe
Township Police

BRADS LANDFILL

November 3, 2025

Pennsylvania State Police - Troop L - Frackville
31 Eleanor Drive
Frackville, PA 17931

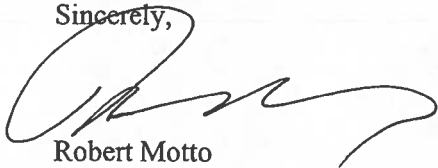
Re: BRADS Landfill
Transportation Safety Enforcement
Our file: b/1312.3/TSE ltr

Dear State Police:

BRADS is committed to promoting compliance with all transportation safety laws. In that regard, we encourage your staff to set up, as needed, at our facility to inspect and enforce safety laws on any vehicles entering our site.

In the event you have any questions, please don't hesitate to contact me.

Sincerely,



Robert Motto
Operations Manager

cc: Kevin Bodner, Martin & Martin, Inc.

BRADS LANDFILL

November 3, 2025

Blythe Township Police
P.O. Box 1
Cumbola, PA 17930

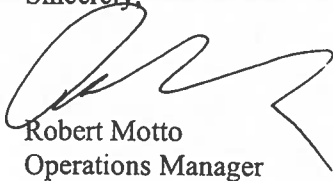
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