

April 30, 2026

Mr. David Pannucci, Regional Engineer
Blythe Recycling and Demolition Site Holdings, Inc.
P.O. Box 335
St. Clair, PA 17970
via email: david.pannucci@wasteconnections.com

Re: Operation Permit Renewal
Blythe Recycling and Demolition Site (BRADS) Landfill
Application No. 101679-A241
Blythe Township, Schuylkill County

Dear Mr. Pannucci:

Enclosed is the permit renewal for Solid Waste Management Permit No. 101679 which the Department is issuing to Blythe Recycling and Demolition Site Holdings, Inc. for the continued operation of a construction and demolition waste landfill known as Blythe Recycling and Demolition Site (BRADS) Landfill. This permit renewal is based on information in the application entitled “Blythe Recycling and Demolition Site Holdings, Inc. Permit Renewal” received by the Department on January 25, 2024. The notice of the application was published in the PA Bulletin on February 10, 2024. A technical deficiency letter was issued on July 30, 2024. The Department received a response to the deficiency letter on August 29, 2024. A second technical deficiency letter was issued on September 19, 2025. The Department received a response to the second technical deficiency letter on November 10, 2025. The application was prepared by Martin and Martin, Inc.

The expiration for the renewal permit is January 20, 2035.

Enclosed as part of this approval is a permit modification Form 13-A. Any conditions stated on the Form 13-A modifies and replaces permit conditions regarding your operating permit. All other items and conditions from your permit shall remain in force and effect.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board) pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa. C.S. Chapter 5A. The Board’s address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at www.ehb.pa.gov or by contacting the Secretary to the Board at 717-787-3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions regarding this matter, please contact Matthew Glogowski at (570) 830-3128.

Sincerely,

Roger Bellas

Roger Bellas
Environmental Program Manager
Waste Management Program

Enclosures – Form 13-A and Comment Response Document

cc: Martin and Martin, Inc., knbodner@yahoo.com (w/enc.)
Blythe Township, blythetwp@verizon.net (w/enc.)
Schuylkill County, bhetherington@co.schuylkill.pa.us (w/enc.)
Schuylkill County Planning Commission, ssmith@co.schuylkill.pa.us (w/enc.)

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT**

**FORM NO. 13-A
MODIFICATION TO SOLID WASTE DISPOSAL AND/OR PROCESSING PERMIT**

Under the provisions of Act 97, the Solid Waste Management Act of July 7, 1980, Solid Waste Permit
Number 101679 issued on (date original permit was issued) January 20, 2015 to
(permittee) Blythe Recycling and Demolition Site Holdings, Inc.
(address) 1061 Burma Road, PO Box 335
Saint Clair, PA 17970

is hereby modified as follows:

1. This permit modification is being issued pursuant to the Pennsylvania Solid Waste Management Act of July 7, 1980, and the Municipal Waste Management Regulations effective September 14, 2002.
2. This permit renewal is based on the information in the application package received by the Department on January 25, 2024, entitled "Blythe Recycling and Demolition Site Holdings, Inc. Permit Renewal"; supplemental information was received on August 29, 2024, and November 10, 2025. The application was prepared by Martin and Martin, Inc. The application package included the following:
 - a. Narrative
 - b. GIF – General Information Form
 - c. Form A – Application for Municipal or Residual Waste Permit
 - d. Form B – Professional Certification
 - e. Form B1 – Application Form Certification
 - f. Form C-1 – Compliance History
 - g. Form 46 – Relationship Between Municipal Waste Management Plans and Permits
3. This permit renewal allows Blythe Recycling and Demolition Site Holdings, Inc. to continue operation of this facility per the approved application and the existing terms and conditions of this permit until January 20, 2035.
4. Within sixty (60) days of issuance of this permit, the permittee shall submit an updated Cell Development Plan which includes estimated dates for waste disposal, placement of intermediate cover, and placement of final cover for each Cell. Cell Development Plan drawings should include sequencing for each Cell which identifies active areas, intermediate areas, final cover areas, and areas planned to be vegetated.
5. The permittee shall relocate well MW-4D to a more suitable location for monitoring of groundwater downgradient of the landfill. The new location shall be free from any external factors that may affect groundwater chemistry in the new well. Prior to relocation, the permittee shall submit a plan to the Department containing a well plan and potential locations for MW-4D.
6. The permittee shall construct litter fencing around the southern limit of future Cell 4, similar to the construction of the existing litter fencing located along the southern and eastern perimeter of Cell 1.
7. For each partial lift that the permittee does not intend to place additional waste material for one (1) year, intermediate cover or an approved alternative must be installed. The intermediate cover

areas must be capable of supporting germination and propagation of vegetative cover. Vegetation on intermediate cover areas must be established within thirty (30) days.

8. The permittee shall implement and enforce a traffic control plan which identifies the permitted route for all waste hauling vehicles traveling to and from BRADS. The permittee shall communicate the proper travel route with all waste haulers. In the event that complaints are received regarding vehicles traveling to the landfill, or vehicles are found to not be adhering to the approved traffic plan, the permittee shall conduct an investigation for any possible violations.
9. BRADS shall submit a Major Modification application to the Department to modify its Solid Waste Permit to permit the vehicular transportation of leachate from Leachate Tanks 1 and 2 to an off-site facility for treatment as the Facility's basic and primary treatment method by May 29, 2026, if an agreement to direct discharge leachate to the Schuylkill Valley Sewer Authority wastewater treatment facility is not reached.
10. The permittee shall keep a record of the volume of landfill leachate generated and the volume of leachate disposed of. All leachate generation and disposal data shall be provided to the Department with the monthly landfill report.
11. The permittee shall construct a gas control system within Cell 3, Cell 4, Cell 5, and Cell 6 for the collection of landfill gas and mitigation of odors related to hydrogen sulfide gas. The gas control system shall be constructed in conjunction with the development of each Cell. Within sixty (60) days of the issuance of this permit, the permittee shall submit plans to the Department detailing the gas control system to be constructed within each Cell.
12. The permittee shall continue to maintain and operate the hydrogen sulfide vacuum adsorption vessels, V-201 and V-301, and the landfill gas flare. These systems may be modified if the Department or permittee determine the equipment is not adequately mitigating landfill gas odors or performing to manufacturer or regulatory standards. The Department shall be notified at least ten (10) days prior to modification of these systems and a minor permit modification may be required.
13. The permittee shall continue to submit monthly landfill gas data and reports including but not limited to landfill gas well data, landfill gas readings, and landfill gas flare emissions data. All reports shall be submitted to the Department before the 15th of each month.
14. The permittee shall maintain a hydrogen sulfide meter with a detection limit of less than 10 ppb onsite for use as needed. The permittee shall have staff on site during normal business hours trained in the use of the meter.
15. The permittee shall conduct daily site perimeter checks for hydrogen sulfide odors. If hydrogen sulfide odors are detected, the permittee shall attempt to identify the area(s) causing the odors with the hydrogen sulfide meter and implement corrective action consistent with the most recently approved nuisance minimization and control plan (NMCP). The permittee shall document the results of the daily perimeter checks along with any corrective actions taken. These records shall be made available to the Department upon request.
16. The permittee shall conduct quarterly surface emissions monitoring (SEM) for hydrogen sulfide across all active disposal areas and areas with intermediate cover, including the northwest side of Cell 1 and Cell 2 and the southeast slope. The permittee shall document the monitoring results and identify any exceedances or elevated hydrogen sulfide readings above 30 ppb and initiate

corrective actions for any identified exceedances. This SEM, corrective actions and re-monitoring will be the same general procedures as dictated by NSPS SEM events and consistent with the most recently approved NMCP.

17. Cell 1 regrading, placement of final cover, and revegetation, as per the Minor Modification approved by the Department on April 30, 2025, shall be completed prior to waste disposal taking place in Cell 4. Final cover placement and revegetation shall be completed within thirty (30) days of completion of regrading. The permittee shall submit a Form 37 Construction Certification to the Department upon completion of the regrading and revegetation of Cell 1.
18. Within 5 years of the date of this renewal permit, the Department will evaluate the permit to determine if it reflects currently applicable operating requirements as well as current technology and management practices. The Department may require modification, suspension or revocation of the permit if necessary. Within thirty (30) days of April 30, 2031, the permittee shall submit to the Department a summary of changes to the operations since the date of this permit.

This modification shall be attached to the existing Solid Waste Permit described above and shall become a part thereof effective on (date) April 30, 2026.

Roger Bellas

FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Comment-Response Document

**Blythe Recycling and Demolition Site (BRADS)
Landfill
Permit Renewal Application
Permit No. 101679
Blythe Township, Schuylkill County
May 29, 2024 Public Hearing**

Prepared by:
Pa. Department of Environmental Protection
Northeast Regional Office
Waste Management – Facilities Section

April 2026



Pennsylvania
**Department of
Environmental Protection**

PROJECT DESCRIPTION

The Blythe Recycling and Demolition Site (BRADS) landfill is comprised of an existing construction/demolition waste landfill located off Burma Road in Blythe Township, Schuylkill County. The permit area is 252 acres, with a 110-acre disposal area. On January 25, 2024, the Department of Environmental Protection (DEP) received an application for renewal of BRADS landfill's solid waste permit. The application seeks to allow the continued operation of the landfill for another 10-year permit term.

A public hearing regarding the permit renewal application was held on May 29, 2024. The Municipal Waste regulations require DEP to prepare a summary of the written and oral comments submitted at a public hearing and provide responses to the comments. This Comment-Response Document summarizes public comments received by DEP at the May 29, 2024 Public Hearing and provides the Department's responses to those comments. All commenters are individually listed in this document. Additionally, since the application has been submitted, DEP has received public comments regarding the landfill via mail and email. Comments/concerns which were not raised as part of the hearing comments have also been included and responded to.

LIST OF COMMENTATORS

1. Brian Pearson
Citizen
2. Taryn Fatula
Citizen
3. Adrian Portland
Citizen
4. Emmet Portland
Citizen
5. Erin Portland
Citizen
6. Joshua Hart
Citizen
7. Alissa Holiday
Citizen
8. Richard Kost
Citizen
9. Deborah Piccioni
Citizen
10. Walter Haas
Citizen
11. David Plachko
Magisterial District Judge for St. Clair and Blythe Township
12. Richard Tomko
Mayor of St. Clair
13. Lindsay Hand
Citizen
14. Ted Hughes
Citizen

15. Michael McCord
Citizen (and former Council member)
16. Chris McCoach
Citizen
17. Carl Miller
Citizen
18. Norm Dihl
Citizen
19. Vaughn Besay
Citizen
20. Diane Thorn
Citizen
21. Robert Kuzio
Citizen

COMMENTS AND RESPONSES

Odors

1. **Comment:** There are regular off-site hydrogen sulfide odors from the landfill causing a nuisance in the community.

Response: The Department acknowledges that, at times, BRADS has been the source of odors. The Department cited BRADS for violations related to malodors causing nuisances in the community as a result of complaint investigations. Specifically, Notices of Violation were issued to BRADS on January 2, 2024, May 8, 2024, September 30, 2024 and October 29, 2024. In response, BRADS installed a flare as well as a system of vertical landfill gas (LFG) extraction wells and horizontal collectors in addition to its hydrogen sulfide (H₂S) treatment system to address landfill gas/hydrogen sulfide odors. The H₂S treatment system removes/reduces the concentration of sulfur compounds entering the flare. The flare destroys any remaining odorous constituents in the LFG. BRADS has also submitted drawings for future gas collection in Cell 3 through Cell 6 which includes plans for future gas extraction wells and gas collection pipeline. Additional horizontal collection systems will be installed as needed when construction and active use of each new cell progresses. The Department has executed a Consent Order & Agreement with BRADS to resolve past violations regarding odor, litter, intermediate cover and leachate management issues. The Agreement included a \$96,525.00 penalty and corrective actions to minimize the possibility of these issues from reoccurring. Included in the corrective actions are requirements to perform daily site perimeter checks for odors, conduct quarterly surface emissions monitoring for H₂S and a modified Nuisance Minimization and Control Plan (NMCP). The Department also conditioned the renewed permit with additional requirements to further minimize the possibility of these issues from recurring. DEP's regular inspections, offsite odor patrols and complaint investigations have confirmed that these corrective actions have been effective to minimize offsite odors.

2. **Comment:** Odors are reported and confirmed with DEP inspectors; however, nothing gets done and it just keeps happening.

Response: See response to Comment #1.

3. **Comment:** Renewal of the landfill permit should only be considered if there is mitigation of the odor issues.

Response: See response to Comment #1.

4. **Comment:** There is no mention of H₂S removal or containment from in solution such as in the leachate. This is another source which can/will cause odors. This will require additional mitigation measures.

Response: Leachate generated at BRADS landfill is conveyed to and stored in two open top storage tanks on site. All leachate is currently transported by tanker truck to approved wastewater treatment facilities for treatment. BRADS has installed a leachate conveyance piping system to transfer leachate directly from the landfill to the Schuylkill Valley Sewer Authority (SVSA) for treatment. BRADS is negotiating an agreement with SVSA to commence the use of this line. DEP has not identified the storage tanks as a source of odors. No additional odor mitigation measures are necessary.

5. **Comment:** Not all of the odor is produced by H₂S. There are other sulfur containing compounds generated by C&D landfill wastes that also cause strong odors which are malodorous with low odor thresholds such as various mercaptans and sulfides.

Response: See response to Comment #1.

Health Effects

6. **Comment:** The hydrogen sulfide emissions causing odors in the community are unsafe and can negatively affect health.

Response: Regulations and permits are developed to be protective of public health. Implementation of proposed operational controls, mitigation plans and the NMCP are designed to protect public health. That said, some people can have a strong reaction to unpleasant environmental odors, while others may have no reaction. At times, the H₂S levels observed may have been high enough to potentially cause symptoms or conditions related to the smell of H₂S, such as headache, nausea, fatigue, or stress in some people. This may occur more in those people who have strong reactions to odors. The level at which people can smell H₂S in air, also referred to as an odor threshold, varies widely and ranges from 0.0005-0.3 parts per million (ppm), or 0.5-300 parts per billion (ppb). People are primarily exposed to H₂S by inhalation, and since it naturally occurs in the environment, the general population will have some exposures. H₂S sampling conducted by DEP staff, using a Jerome Meter, occurs frequently at the landfill to measure the concentrations of H₂S being emitted from the surface of the landfill. The majority of these readings are significantly less than 1 part per million (ppm). Given the majority of readings obtained on site, taken inches from the surface of the landfill, are below 1 ppm, it is unlikely that residents over 1.5 miles from BRADS are/were exposed to harmful levels of H₂S. Established exposure limits are 70 ppb for acute exposure, 20 ppb for intermediate exposure and 1.8 ppb for long term daily exposure.

See also response to Comment #8.

7. **Comment:** The community has been exposed to hydrogen sulfide, asbestos, and countless other harmful and cancer-causing agents like lead, cadmium, dioxin, mercury, and PCBs that are found in leachate produced and currently hauled from the landfill to a local treatment facility. The landfill relies on their liner to prevent chemicals from leaking

into the surrounding soil and waterways. Unfortunately, these liners sometimes fail, allowing chemicals to be released into the environment.

Response: BRADS landfill is designed with a protective liner according to current engineering design standards and 25 Pa Code Chapter 277 for construction / demolition (“C&D”) landfills. DEP regulations clearly provide liner and construction requirements that are designed to be protective of the environment. As such, the design is a lined system with leachate collection and detection. The landfill design met or exceeded all applicable design standards. BRADS is required to certify all of its construction work. These certifications are reviewed by DEP staff to ensure all construction standards are met. BRADS landfill has a system of groundwater wells to monitor for any potential environmental degradation. BRADS performs quarterly analysis of chemical composition of leachate to monitor and determine any impact of leachate on the liner system, ensure analytical limits of leachate constituents per the permit are being met, any potential need for modification of groundwater monitoring system, and any potential need for change to any effluent limitations of their NPDES permit. Based on this groundwater monitoring, there is no evidence that BRADS’s current C&D waste landfill operation is impacting soil or groundwater.

8. **Comment:** Hydrogen sulfide from the landfill is causing headaches, burning eyes, stomach illness, breathing difficulty, sinus issues, nose bleeds, and brain foginess.

Response: There have been 317 complaints since January 2024. Of those complaints, 223 complaints occurred in 2024. In 2025 there were 74 complaints received. Approximately 20 complaints were received in 2026. All complaints are responded to. The number of complaints has decreased since 2024. Past odor issues were responded to through odor complaint investigations, H2S gas monitoring using a Jerome meter, and monthly inspections of the landfill. BRADS addressed these past odor issues through the implementation of weekly inspections, daily flare inspections, daily odor patrols, and regular media changeouts of the H2S capture system. These mitigation measures are now permit requirements.

See also response to Comments #1 and #6.

Noise

9. **Comment:** There is often noise from the landfill.

Response: While the Department acknowledges that noise is generated from landfill operations, the impact of the noise on the public is lessened by the landfill’s distance from residential areas and that noise-generating activities generally only occur during normal daytime working hours.

Litter/Debris

10. **Comment:** Debris from the landfill blows off-site onto adjacent property and Burma Road.

Response: Permit conditions require BRADS to control offsite litter by using litter fences at the working face of the landfill and performing weekly litter collection. BRADS had some litter issues in the past due to litter fence failure, improper temporary litter fence placement, operating in high winds, delayed response in clean-up and cover issues. These issues have been addressed by BRADS changing the fence vendor, applying more uniform cover, shutting the tipper when winds are greater than 35 mph. and timelier clean-up of the litter fence/permitted area. Historically, off-site litter clean-up took some time due to BRADS not having adequate equipment on site. BRADS has acquired equipment to enable more rapid clean-up of off-site litter, including litter that had landed in the surrounding trees.

Traffic

11. **Comment:** Landfill truck traffic travels directly through St. Clair.

Response: BRADS has an approved Traffic Control Plan that it is required to adhere to. This plan has designated truck routes based on size and type of truck as well as the origin of the waste being hauled. All trucks hauling waste generated outside of the Borough of St. Clair must use approach route number 1. This route requires all trucks to enter the landfill from the East via Burma Road. Approach route number 2, which allows for trucks to utilize roads and streets within the Borough of St. Clair can only be used by trucks hauling waste generated within the borough and these trucks must be under 10 ton. Any complaints or observations that trucks are not following the routes and/or the landfill is not using procedures for trucks to adhere to landfill travel routes are investigated for any potential violations. As part of this renewal application, BRADS updated its Traffic Compliance Plan to specifically restrict any vehicles over 10-ton from utilizing approach route #2. Only trucks carrying waste generated within the Borough of St. Clair can utilize approach route #2. BRADS will conduct random observations of incoming vehicles approach routes to ensure compliance. BRADS also sent the Borough of St. Clair's Chief of Police a letter informing them of this change and encouraging them to contact the landfill if they suspect any vehicles of violating BRADS Traffic Compliance Plan.

12. **Comment:** Trucks carrying leachate drive through St. Clair passing the Little League field, the playgrounds, and school.

Response: All leachate hauling trucks are required to follow a prescribed route in accordance with the facility Traffic Compliance Plan and also pursuant to the Department permit minor modification issued October 9, 2024, condition #2, which provides: All leachate hauling vehicles shall enter and exit the site via "Approach Route 1" as identified in the BRADS Traffic Control Plan. No leachate hauling vehicle may travel through Saint Clair Borough, with the exception of Route 61.

13. **Comment:** Debris falling off trucks is causing flat tires and trucks traveling to/from BRADS through St. Clair have also spilled liquid contents onto streets.

Response: Trucks that utilize the landfill are required to have tarping on their loads while traveling to the BRADS. BRADS does not accept liquids at the landfill. The Department has not received any complaints regarding the issue of flat tires or liquid contents spilling onto the street. If residents observe these types of issues, the Department recommends that they contact BRADS and/or file a complaint with the Department. The best way to file a complaint regarding waste from trucks utilizing BRADS would be to call the DEP Northeast Regional Office complaint line at 570-826-2511. Complaints can be filed day or night. To report a complaint online, concerned citizens can complete the electronic complaint form [Environmental Complaint Form](http://www.pa.gov/agencies/dep/report-incidents-and-complaints) at www.pa.gov/agencies/dep/report-incidents-and-complaints, which will be automatically forwarded to the regional office covering the area where they live. Complaints can also be registered by calling [1-800-541-2050](tel:1-800-541-2050).

See also response to Comment #11.

14. **Comment:** Traffic is a concern. Many of the trucks hauling waste have safety violations and are overweight.

Response: The State Police have jurisdiction over enforcing vehicle safety laws. In an effort to minimize the number of unsafe vehicles utilizing the landfill, BRADS sent letters to the Pennsylvania State Police Troop L and the Blythe Township Police encouraging them to utilize their facility to conduct safety inspections on the vehicles entering the landfill. Overweight truck concerns were brought up to BRADS during the application review process. In response, BRADS revised its Transportation Compliance Plan to include placing overweight drivers in a holding area for first and second offenses and prohibiting drivers from coming to BRADS upon the third offense. BRADS also requested that Blythe Township update its Surcharge Fee Tier Resolution. The new resolution, signed in November 2024, now includes a minimum \$200 surcharge for any truck over 80,000 pounds. Since this \$200 surcharge for overweight trucks within 3% of the 80,000-pound maximum gross vehicle weight came into effect in November 2024, the number of overweight trucks reported by BRADS has markedly decreased.

15. **Comment:** If a truck carrying waste were to be involved in an accident, it could impact the environment.

Response: Accidents involving any type of vehicle have the potential to impact the environment. Owners of waste transportation vehicles are responsible for cleaning up any waste spilled or contamination generated by an accident.

16. **Comment:** The heavy weight of tri-axle trucks can damage local infrastructure, leading to increased maintenance costs and potential hazards for other road users.

Response: The Pennsylvania Department of Transportation (PennDOT) has a maintenance agreement with the landfill to address the concern of wear and tear on Burma Road associated with landfill truck traffic.

See also response to Comment #11.

17. **Comment:** Tri-axle waste trucks contribute to air pollution through the emission of diesel exhaust, which contains harmful pollutants such as particulate matter (PM), nitrogen oxides (NOx), and volatile organic compounds (VOCs). These pollutants can exacerbate respiratory conditions like asthma and bronchitis among residents living near landfills and waste truck routes.

Response: The Department of Environmental Protection does not have authority to regulate motor vehicle emissions, however, diesel vehicles operating in Pennsylvania must adhere to the Diesel Idling Act (Act 124).

See also response to Comments #11 and #12.

18. **Comment:** The Applicant's Traffic Compliance Plan has had little effect in the past as can be seen in the extraordinary amount of overweight trucks which come to the facility.

Response: See response to Comment #14

19. **Comment:** The high level of truck traffic and their speeds have made it less than ideal for my children to feel safe crossing Hancock Street.

Response: See response to Comments #11, #12 and #14.

Leachate

20. **Comment:** There are leachate disposal concerns.

Response: See response to Comments #4, #7, #12, #22, #23, #24, and #27.

21. **Comment:** There have been documented violations of leachate not being contained and pouring directly on the ground. How will groundwater be protected from the forever chemicals that have been documented in other areas of the county?

Response: BRADS was cited for violations related to an incident on December 27, 2023, in which leachate was discharged from a failed valve at the leachate sump area. As a result, leachate had run off the lined disposal area and onto the ground adjacent to the lined area. BRADS responded that day to stop the discharge and contain the flow. The contaminated soil from the affected area was removed the following day.

Groundwater sampling data from downgradient wells, collected on a quarterly basis, indicates no impacts from the landfill.

22. **Comment:** Leachate can contain corrosive materials making it only a matter of time before the planned leachate pipeline will eventually contaminate the environment.

Response: The leachate force main is a dual contained 4" x 8" DR 11 high density polyethylene (HDPE) pipeline. HDPE pipe is the design standard for landfill leachate conveyance. It has high abrasion and chemical resistance to an extensive number of reagents and solvents. The standard design life for this pipe material is 100 years. When designed, installed /constructed properly it has high resistance to buckling, crushing and deflection. Landfill leachate pipeline conveyance systems are designed, constructed and certified by a Professional Engineer and must satisfy all DEP regulations and requirements.

23. **Comment:** Leachate typically contains high levels of organic contaminants (measured by COD and BOD), ammonia, heavy metals, and other toxic substances. For example, the U.S. Geological Survey (USGS) found that leachate samples from various landfills contained numerous contaminants, including lidocaine, bisphenol A, and carbamazepine, at significant concentrations. The presence of these substances can pose serious risks if they enter groundwater or surface water systems.

Response: BRADS is a construction and demolition waste-only landfill. The referenced study was conducted at municipal waste landfills, which accepted pharmaceutical waste. Due to BRADS being a C&D-only landfill, it is not permitted to receive any pharmaceutical waste, such as lidocaine or carbamazepine, therefore pharmaceutical waste is not an issue at BRADS.

Bisphenol A, commonly known as BPA, was, and is still, found in many plastic and thermal paper products, but has been phased out of many consumer-grade plastics in the last few decades. Any BPA released by degrading plastics in the landfill would be captured by the landfill's leachate collection system, thereby preventing it from entering the groundwater system. Additionally, the Department has contingencies in place, including groundwater assessment and abatement requirements, if landfill-related contaminants were to be found in groundwater downgradient of the site

See also response to Comment #33.

24. **Comment:** There are several concerns with the monitoring of leachate from the landfill. NPDES Permit No. PA0064211 for the Schuylkill Valley Sewer Authority, which receives leachate from the BRADS Landfill via trucks, requires BRADS to do monthly sampling and reporting for a number of chemicals, including asbestos, however, no monthly IU DMR form was included in the application. BRADS is required to do quarterly sampling and reporting for aluminum and iron, etc.; however, this form was also not provided with this application. Other Leachate Treatment Agreement Metals are

not monitored either monthly or quarterly. Quarterly leachate monitoring is not enough to “...detect spiking concentrations.” BRADS has not been completing the Non-SVSA Untreated Leachate Monitoring Report adequately, resulting in “...limited available leachate data from BRADS Itself.” There has been indication of the presence of PCBs in a Schuylkill Valley Sewer Authority sample and BRADS has been identified as the only “Industrial User,” it was unclear as to why PCBs were detected in the sample.

Response: Compliance with discharge limitations is under the authority of the receiving wastewater treatment plant who also establishes monitoring requirements and frequencies. Under BRADS individual NPDES Permit 0065137, leachate has been tested quarterly for PCBs since at least the third quarter 2020 and PCB results have been below method detection limits for each of the quarterly events over the 5+ years of testing (22 monitoring events).

25. **Comment:** DEP Clean Water Program approved a permit that allows the BRADS Landfill to pump leachate underground through a pipe from the landfill, across Burma Road, underground through natural areas, to a manhole that is located at the corner of a residential area. The WQM permit review and recommendations states that the leachate has the possibility of eating through the pipes and that trucking leachate to and from the BRADS Landfill is still likely. Moreover, the WQM document states that “the force main will cross Little Wolf Creek.” The piping of the leachate will occur near several residential properties. Once reaching the manhole, it will travel to the Schuylkill Valley Sewer Authority, which does not have the treatment capacity to handle leachate. The leachate will eventually flow into the Schuylkill River. This is an extremely concerning permit approval. The actual plan to run the pipe underground over the terrain of a very rocky anthracite coal region is outrageous. I did not see any geological report stating that this was even possible, given the local geology.

Response: The WQM permit review referenced in the comment above identifies aspects of the project that needed to be addressed prior to issuing the associated WQM approval. These concerns were addressed prior to the issuance of WQM Permit number 5423401.

See also response to Comment #22.

26. **Comment:** The original permit 10 years ago required a permanent leachate treatment and disposal system to be in place; however, this is still not in place.

Response: On May 1, 2020 BRADS received approval to replace the leachate treatment system with a direct discharge of untreated leachate to SVSA. BRADS received subsequent approvals to continue to truck leachate to SVSA until December 30, 2025. In December 2025 BRADS completed the installation of this leachate conveyance line. BRADS is negotiating an agreement with SVSA to commence the use of this line. If an agreement cannot be reached BRADS will submit a major modification application to the Department requesting to modify its leachate management plan to allow for the

permanent hauling of leachate as the primary means of conveying its leachate to approved wastewater treatment facilities.

27. **Comment:** What is going to happen after the landfill is closed? There will still be leachate generated. The volume won't be as much, but it will be more concentrated.

Response: BRADS is required to continue to collect and treat leachate even after waste acceptance ceases and the landfill is closed. Additionally, the groundwater monitoring network continues to be sampled for decades after the landfill is closed, with contingencies remaining fully in place, regarding offsite migration of any site-related contaminants. This continued, post-closure monitoring is ensured by site bonding requirements, which the landfill is required to maintain.

Compliance

28. **Comment:** The landfill has received many odor complaints and documented violations regarding leachate and odors; however, has not paid any fines.

Response: Unless a facility is showing no intent to address violations when they are cited by the Department, the Department typically waits to assess penalties for violations until after they are resolved by the violator. The Department can take unilateral enforcement actions with civil penalties such as Civil Penalty Assessments and Administrative Orders. The Department may also enter into settlement agreements to address civil penalty liabilities. There are times when the Department may assess civil penalties prior to violations being addressed, if the violations will take an extended time to correct. In those instances, the violations can be addressed through a settlement agreement called a Consent Order and Agreement, which would contain corrective actions to address the violations within specific deadlines. These documents also typically contain stipulated penalties, which are penalties that accrue for failure to complete corrective actions in accordance with the timeframes specified in the Consent Order and Agreement. Since the violations related to vegetation documented in the Department's January 7, 2026 Notice of Violation will take BRADS some time to address, the Department has executed a Consent Order and Agreement with BRADS, which contains a \$96,525.00 penalty for violations cited by the Waste Management Program in Notices of Violation from 2024 to the present.

See also response to Comment #1.

29. **Comment:** The documented number of complaints, past violations and continuing violations for the existing facility should provide sufficient evidence for the permit to be revoked.

Response: Under the Pennsylvania Solid Waste Management Act, the Department may deny, suspend, modify or revoke a permit if it finds that the applicant has failed or continues to fail to comply with the environmental protection acts, rules or regulations of

the Department, or any permits or orders issued by the Department; or if the Department finds that the applicant has shown a lack of ability or intention to comply. Further, the Solid Waste Management Act provides that any applicant who has engaged in unlawful conduct as defined in the Act, or whose related party has engaged in such unlawful conduct, shall be denied any permit required by the Solid Waste Management Act unless the permit application demonstrates to the satisfaction of the Department that the unlawful conduct has been corrected.

While BRADS does have past violations, BRADS has not demonstrated a lack of ability or intention to comply with the environmental protections acts, the regulations promulgated thereunder, or its permits. BRADS has addressed the cause of the majority of the complaints through the extension of the gas collection system, maintaining the onsite H₂S removal system, installation of the flare and the deployment of proper cover. DEP's regular inspections, offsite odor patrols and complaint investigations have confirmed that these corrective actions have been effective to minimize offsite odors.

Additionally, the Department has entered into a Consent Order and Agreement with BRADS that addresses violations cited by the Waste Management Program in Notices of Violation from 2024 to the present, and contains corrective actions related to intermediate and final cover, vegetation, leachate management, surface emissions monitoring, daily perimeter odor checks and revisions to BRADS Nuisance Minimization and Control Plan to address odors. As this was a consensual agreement, the execution of the Consent Order and Agreement demonstrates the permittee's commitment to correcting the violations and evinces its intention and ability to comply. Moving forward these enhanced controls and measures should address these past compliance issues.

Landfill Ownership

30. **Comment:** Waste Connections has a well-documented poor record of landfill ownership in other areas of Pennsylvania and other states and therefore should not be approved to purchase and own more landfills.

Response: Under the Pennsylvania Solid Waste Management Act, the Department may deny permit issuance if a principal of a corporation was a principal of another corporation which committed past violations of the Pennsylvania Solid Waste Management Act. Also, it provides that any applicant whose related party has engaged in unlawful conduct under the Act shall be denied any permit required by the Solid Waste Management Act unless the permit application demonstrates to the satisfaction of the Department that the unlawful conduct has been corrected.

Waste Connections owns two other landfills in Pennsylvania – Bethlehem Landfill and Blue Ridge Landfill. The Department acknowledges that Bethlehem Landfill Company (BLC) has past and outstanding violations of its operating permit. The Department entered into a Consent Order and Agreement which addresses the outstanding issues through corrective actions with deadlines. BLC also paid a penalty of \$137,750. As this

was a consensual agreement between the parties, BLC has not demonstrated a lack of ability or intent to comply with the environmental protection acts, the regulations or its permit. Blue Ridge Landfill has a rather limited compliance history since the time that Waste Connections has taken over ownership.

While the Waste Connections facilities in the Northeast Region do have past violations, the execution of the Consent Order and Agreement demonstrates the permittee's commitment to correcting the violations and evinces its intention and ability to comply. While the Department does acknowledge that Waste Connections facilities in other states do have compliance history, that compliance history varies from facility to facility. The Department focused on the Pennsylvania facilities regulated under the Pennsylvania Solid Waste Management Act. The Department will continue to evaluate compliance with the BRADS permit and can require modification, suspension or revocation of the permit if necessary.

31. **Comment:** Waste Connections is facing odor complaints and other environmental violations at other landfills they own, making it clear that they are unable to safely operate these facilities.

Response: See response to Comment #30.

DEP Application Review

32. **Comment:** Do any requests for expansion ever get denied by DEP?

Response: Requests for expansion need to meet all requirements as set forth in law and Department regulations. If an applicant does not satisfy the requirements, DEP can and has denied expansion applications.

Waste Types

33. **Comment:** The landfill accepts municipal waste other than construction/demolition waste. There is litter and paper materials in the litter fencing; birds swarm the landfill (indicating that there is a food source in the waste); trucks going to the landfill are registered municipal waste haulers; and a truck on its way to the landfill was carrying dead animals.

Response: The facility is permitted to accept only construction and demolition waste. It is not uncommon for C&D waste to contain packing materials such as paper, plastic, and cardboard. All trucks entering BRADS landfill are required to be labeled with the words "Municipal Waste." C&D waste is municipal waste. DEP has investigated several complaints regarding the type of waste BRADS receives and disposes of. DEP has never identified any unacceptable waste being disposed of during its inspections. However, BRADS site personnel have discovered unacceptable waste streams entering the facility. These loads were rejected and sent back to the generator.

34. **Comment:** The landfill accepts asbestos which is a known carcinogen.

Response: Pursuant to the existing operating permit, Part II, I Basic Limitations, condition #3, the permittee is allowed to dispose of friable asbestos as long as the requirements of 25 Pa. Code §§ 288.192 & 288.302 are met.

35. **Comment:** Municipal waste is being dumped there causing a constant smell of rotten food.

Response: See response to Comments #1 and #33.

36. **Comment:** We should not be accepting trash from other areas. Let those areas maintain their own wastes.

Response: The facility is allowed to accept wastes from other areas, the practice protected under the Commerce Clause/Interstate Commerce Act. DEP cannot take into consideration the quantity of out-of-state waste that is disposed of at BRADS. The transport of waste across state boundaries is considered a matter of interstate commerce. Interstate commerce is protected by the Commerce Clause of the United States Constitution, Article I. A state may not prohibit or place barriers to articles of commerce entering or exiting its boundaries without express Congressional authorization or a compelling state interest. Solid and liquid refuse and the rights to landfill space to dispose thereof are articles of commerce under the Commerce Clause.

Property Values

37. **Comment:** The landfill is lowering property values.

Response: Property devaluation is difficult to prove because of the many factors that affect the value of a property, perception being one of those factors. DEP has not seen any evidence that BRADS is negatively affecting the sale of existing homes, or the construction of new residential development in the area.

Environmental Impacts

38. **Comment:** The landfill is polluting the air and water.

Response: Regulations and permits are developed to be protective of public health. Implementation of proposed operational controls, mitigation plans and the NMCP are designed to protect air, water and public health. BRADS has obtained permits from DEP's Waste, Air and Clean Water Programs. All of these permits are evaluated to ensure compliance with regulatory standards which are protective of the environment and the community.

See also response to Comments #6, #7, #17, #21, #23, #25, #27, #42, #43, #55 and #65.

39. **Comment:** The animals that we hunt for food are being exposed to toxins from the landfill.

Response: See response to Comment #38.

40. **Comment:** The accumulation of waste in such a large quantity could disrupt local ecosystems, harming wildlife and vegetation. This environmental degradation not only affects biodiversity but also impacts the natural beauty and recreational value of our area.

Response: During the evaluation of the original permit, potential visual and recreational impacts were evaluated during the Environmental Assessment phase. Also, potential biodiversity and wildlife impacts are evaluated through a PNDI (Pennsylvania Natural Diversity Inventory) Environmental Review. The PNDI Environmental Review analyzes project footprints against species locations and recommends conservation measures and other actions that may be needed to fulfill the requirements of a permit.

See also response to Comment #38.

41. **Comment:** What happens in 20 years when the so call protective barrier under the waste fails?

Response: See responses to Comments #7 and #27.

42. **Comment:** The landfill has impacted groundwater and soil.

Response: The landfill is required to follow the Groundwater Quality Monitoring requirements within 25 Pa. Code §§ 277.281 through 277.288, which specify the groundwater monitoring requirements BRADS must follow to be protective of groundwater. DEP reviews groundwater monitoring results from BRADS' groundwater monitoring network, on both a quarterly and annual basis. To date, no landfill-related impacts have been observed in downgradient monitoring wells.

BRADS also has a leachate detection zone that is monitored quarterly. To date, iron and manganese are the only two monitored analytes that are over their respective secondary maximum contaminant levels (secondary MCL) within the leachate detection zone. Both iron and manganese have been detected over their secondary MCL in one or more upgradient wells, since the sampling program began at BRADS, and they are both commonly elevated in old coal mining regions of Schuylkill County, PA.

While soil is not typically sampled at municipal waste landfills, waste in BRADS landfill, and generally at all modern landfills, does not ever come into contact with site soils and is segregated from native soils by the landfill liner system. Leachate is managed through the leachate collection system, which is also segregated completely from site soils.

If BRADS were to impact any soils through any landfill-related activities, they would be required to immediately remediate the impacted soils. Remediation of impacted soil includes completely removing all impacted soils, and disposing of them at an appropriate facility, depending on the soil's waste characterization. A specific example of this enforcement by DEP, occurred when BRADS was cited for violations related to an incident on December 27, 2023 in which leachate was discharged from a failed valve at the leachate sump area. As a result, leachate had run off the lined disposal area and onto the ground adjacent to the lined area. BRADS responded that day to stop the discharge and contain the flow. All contaminated soil from the affected area was removed the following day.

Again, groundwater sampling data from downgradient wells, collected on an ongoing quarterly/annual basis, indicate no impacts from the landfill.

43. **Comment:** The landfill is polluting the creek that runs through the community.

Response: The landfill is required to manage stormwater through designed channels and collection system. The effluent discharge from their stormwater management system is regulated under the Clean Water Program Industrial Stormwater Discharge PAG-03 NPDES Permit number PAG032357. This permit requires periodic sampling during a storm event to ensure compliance with stormwater discharge limits. This NPDES permit ensures BRADS is not discharging any contaminated water to any surface water bodies located near the site, via their NPDES monitored discharge.

Additionally, the site's Groundwater is monitored on a quarterly and annual basis and no impacts have been observed.

See also response to Comment #42.

Renewal Application Contents

44. **Comment:** The application includes an incorrect address for an adjacent property owner.

Response: BRADS re-sent the notification letter to the correct address when this was brought to DEP's attention shortly after the application was submitted.

45. **Comment:** There is no evidence of a formal notification process for the Borough of St. Clair.

Response: The landfill and the Department followed all regulatory requirements for public and municipal notifications.

46. **Comment:** The responses to questions 2 and 3 on the General Information Form are incorrect.

Response: DEP and BRADS followed all regulatory requirements for public and municipal notifications and comment periods for the permit renewal application and the major modification application for a tonnage increase. Additional community outreach was conducted by DEP's Environmental Justice Office and information was made available on DEP's website. A public hearing was held on May 29, 2024 and a public outreach meeting was held on November 19, 2024.

47. **Comment:** The project information is incorrect. The landfill's location is designated as an environmental justice area and the location is within a half mile of St. Clair Borough, also an environmental justice area.

Response: While the landfill is located in an environmental justice area, a permit renewal is not a "trigger permit" as defined in DEP's Environmental Justice Policy; therefore, the Department did not require BRADS to correct the General Information Form. Furthermore, despite the response in the application, DEP did choose to "opt in" under the Environmental Justice Policy and implemented enhanced public participation such as posting the application on DEP's website and conducting community outreach.

48. **Comment:** Form C1 indicates there are no changes; however, BRADS Landfill is currently out of compliance.

Response: DEP required BRADS to submit a revised Form HW-C with an updated compliance history.

See also response to Comment #29.

49. **Comment:** The county waste management plan filed with DEP is dated 2015; however, the plan submitted with the Form 46 for the renewal application is dated 2016.

Response: The County Waste Management Plan that was submitted with the BRADS renewal application was the County Waste Management Plan revision that was submitted for final review to DEP on August 14, 2017 and approved on October 3, 2017. This is the most recent approved County Waste Plan.

50. **Comment:** The ownership of the landfill within the county plan is attributed to FKV, LLC. Waste Connections is not identified as the owner.

Response: Thank you for bringing this to the Department's attention. This type of issue is typically addressed when the plans are renewed. The Department informed the County of the change of ownership so that it will be corrected in the next Plan.

51. **Comment:** What criteria does the DEP use to determine whether or not to renew the permit?

Response: The Department performs a complete review of the renewal application to ensure conformance with all applicable requirements under 25 Pa Code Chapter 277 for Construction/Demolition Waste Landfills (25 Pa Code 277.201). Conformance with Operating Requirements (25 Pa Code 277.202), inspection records, compliance history and the consideration of public comments are also factors used in making the determination to renew the operating permit. As part of DEP's review, the Regional Waste Management Program also worked with other regional staff and legal counsel, to be sure that its review of issues and concerns were properly considered and documented in the record.

52. **Comment:** If the landfill hasn't fixed the issues before, what makes DEP think they will fix them after the permit is renewed?

Response: The Department has identified issues with odors, insufficient cover and litter. In response to the odor issues, BRADS installed a flare as well as a system of vertical landfill gas extraction wells and horizontal collectors in addition to its H₂S treatment system to address landfill gas/hydrogen sulfide odors. In response to cover and litter issues, BRADS applied more uniform cover, increased litter cleanup efforts, and shuts down its tipper during high wind conditions.

See also response to Comment #1.

Environmental Justice

53. **Comment:** BRADS is located in and near an environmental justice area. St. Clair is an environmental justice area and is continually harmed by the BRADS Landfill.

Response: A landfill permit renewal application is not a trigger permit under the Environmental Justice Policy. However, because the landfill is located in an environmental justice area and there was heightened public interest in this application, DEP opted to conduct enhanced public participation actions (i.e., posting information on website, conducting outreach and holding a public hearing and public meeting).

54. **Comment:** The BRADS Landfill is close to Saint Clair, a low-income area already facing many challenges. The landfill's emissions, leaking waste and constant truck traffic make life even harder for residents, affecting their health and quality of life.

Response: See response to Comments #7, #11, #12, #14 #38, #42, and #53.

Quality of Life

55. **Comment:** The presence of the landfill reduces the quality of life in St. Clair.

Response: BRADS was required to submit an Environmental Assessment with its initial application and with the more recent major modification application. In the

Environmental Assessment, which is included as part of Form D of the application, numerous criteria which could potentially affect quality of life are evaluated. These criteria include any potential geologic hazards, stream or river impacts, traffic, aesthetics, stormwater discharge rates, wetland impacts, parks and recreational areas, fish, game and plant impacts, groundwater, potential impacts to historical areas, airport impacts, air quality impacts, and a determination on whether the landfill meets zoning criteria. The applicant also must address any additional potential harms raised through public comment, DEP concerns, or concerns raised by other departments within state government. Where necessary the applicant develops mitigation measures for impacts the landfill will create. The applicant then conducts an evaluation of the environmental, social, and economic harms and benefits that would occur should the permit application be approved. The Department then reviews all of the above information and makes its own evaluation of the harms and benefits of the project. The Department found the benefits of the project to outweigh the harms when BRADS was originally issued the permit. For the renewal application, DEP evaluated how effective BRADS' mitigation measures have been since they began operating and required BRADS to take additional measures as necessary to ensure harms continue to be mitigated to the fullest extent.

56. **Comment:** The extension of the permit would be deleterious to the environment in St. Clair and to the health of the residents.

Response: See response to Comments #6, #7, #11, #12, #14 #38, #42, #53 and #55.

Benefits to the Local Community

57. **Comment:** The St. Clair fire department and police department were supposed to receive \$0.05/ton; however, no money has been received. No agreement for the exchange of funds exists between the BRADS Landfill, the St. Clair School District, or the Borough of St. Clair.

Response: The agreement to provide money to the St. Clair fire department and police department is part of the pending application for major modification. The fees would not have to be paid unless that modification is approved.

58. **Comment:** BRADS Landfill has no benefit to local residents and local government.

Response: There were multiple benefits approved, affecting more than just Blythe Township, during the initial permitting of the landfill. These include discounted disposal rates for multiple municipalities, re-establishing Little Wolf Creek, employment, recycling drop-off, removing historically disposed wastes, state taxes, and a fossil repository.

Harms/Benefits Analysis

59. **Comment:** The benefits of the landfill do not outweigh the harms. The only benefits are financial and are to entities that don't even live in the community. The benefits included would be negligible.

Response: There is no harms/benefits analysis completed as part of the renewal application. The benefits of the landfill were determined to outweigh the harms in the initial decision to approve the landfill permit.

See also response to Comment #58

60. **Comment:** There is not any reflection of the additional costs to be incurred by residents through fee increases, taxes increases, etc. to account for this additional harm.

Response: The Department is not aware of any fee increases or tax increases directly related to the landfill.

61. **Comment:** There is only one Benefit. The weight of that Benefit should be significantly reduced due to costs associated with unmitigated Harms. In addition, the one Benefit is temporary for the life of the landfill. The only municipality receiving the Benefit is Blythe Township, but the ultimate responsibility falls on them if there is a failure of this permanent landfill.

Response: There are no unmitigated harms. While some harm/potential harm remains, DEP requires the landfill to have mitigation measures for each harm. There were multiple benefits approved, affecting more than just Blythe Township, during the initial permitting of the landfill. These include discounted disposal rates for multiple municipalities, re-establishing Little Wolf Creek, employment, recycling drop-off, removing historically disposed wastes, state taxes, and a fossil repository.

Public Outreach

62. **Comment:** DEP fails to recognize the importance of effectively communicating critical information, such as opportunities to comment on permit applications and request hearings.

Response: DEP and BRADS followed all regulatory requirements for public and municipal notifications and comment periods for the permit renewal application and the major modification application for a tonnage increase. Additional community outreach was conducted by DEP's Environmental Justice Office and information was made available on DEP's website. A public hearing was held on May 29, 2024, and a public outreach meeting was held on November 19, 2024.

Vectors

63. **Comment:** The current permit does not address the hazards posed by foraging birds. However, recent observations have revealed a significant presence of a varied bird community within the landfill premises. This indicates that the landfill waste serves as a food source for these birds, posing health hazards to landfill crews due to potential disease transmission. Additionally, ingestion of waste by birds can lead to harm and subsequent issues. Furthermore, there is a risk that bird related problems may extend to the surrounding community. The presence of foraging birds clearly indicates the presence of “Putrescible waste,” solid waste containing organic matter capable of decomposition by microorganisms, leading to malodor, gases, offensive conditions, or serving as food for birds and vectors. Birds frequenting landfills can be carriers of over 60 transmissible diseases, some of which can be fatal to humans. These diseases are spread through their feces, which contaminates both the landfill site and surrounding areas. This poses a health risk to landfill workers and the nearby community as the birds can transport pathogens to residential zones.

Response: The landfill conducts operations to limit the attraction of vectors, such as birds, by limiting the size of the working face and compacting and covering the waste daily. Furthermore, BRADS only accepts construction and demolition waste which does not typically attract vectors to the extent putrescible municipal waste does. DEP has not observed anything other than construction and demolition waste being disposed of at BRADS Landfill nor have DEP inspectors observed any vector issues.

64. **Comment:** The community has observed a rise in pest populations, such as rodents and insects, which are often attracted to landfill sites. These pests can carry diseases and create further health hazards for residents.

Response: The landfill conducts operations to limit the attraction of vectors by limiting the size of the working face and compacting and covering the waste daily. Furthermore, BRADS only accepts construction and demolition waste which does not typically attract vectors to the extent putrescible municipal waste does.

Air Quality

65. **Comment:** According to EPA Document 600/R-14/039, landfill gas control at C&D landfills may be complicated by the fact that substantial quantities of other gases such as CH₄ are not produced, which is a reflection of the types of waste normally deposited in C&D landfills. In cases where active landfill gas controls are used at C&D landfills, supplemental fuel may be required to provide enough BTU content to combust the gas. Therefore, the mitigation would require off gassing a flare which releases CO₂ which is a harm and transporting and burning another fuel source which is two more harms. Also, burning of H₂S can produce SO₂ which is primary pollutant subject to national ambient air quality standards in the United States.

Response: The primary concern at BRADS is removal of H₂S to minimize potential for off-site odors. H₂S inlet concentrations at the flare are limited in order to ensure that

outlet sulfur dioxide concentrations remain below ambient air quality standards. Secondary concerns such as carbon dioxide production and fuel transport as a result of H₂S control are necessary to reduce the immediate risk of elevated H₂S emissions and are within acceptable standards.

Drinking Water Impacts

66. **Comment:** The landfill's waste management is poor, leading to leaks near our drinking water source.

Response: See response to Comments #7, #21, #22, #23, #27, #38, #42, #43, and #55