



September 19, 2025

Mr. David Pannucci, Regional Engineer
Blythe Recycling and Demolition Site Holdings, Inc.
1786 Salcman Road
Waterloo, NY 13165
via email: david.pannucci@wasteconnections.com

Re: 2nd Technical Deficiency Letter
Permit Renewal Application
Blythe Recycling and Demolition Site (BRADS) Landfill
Application No. 101679-A241
APS ID# 1106245, Auth ID# 1470869
Blythe Township, Schuylkill County

Dear Mr. Pannucci:

The Department of Environmental Protection (DEP) has reviewed the technical deficiency response for the permit renewal application for the above referenced facility and has identified additional deficiencies.

As you are aware, the renewal application was deemed administratively complete on January 29, 2024. Technical review of the renewal application commenced at that time. The Department issued a Technical Deficiency Letter on July 30, 2024, and additional information was requested via email on November 13, 2024.

On January 17, 2025, the Department granted a permit modification for an extension to the term of BRADS permit until July 30, 2025. The extension purpose was specific to evaluation of application sections related to the gas collection and control system.

On July 30, 2025, the Department granted a permit modification for a second extension to the term of the BRADS permit until January 30, 2026. The purpose of the second extension was to allow for additional time to evaluate the landfill's gas collection and control system and to evaluate concerns related to traffic.

The Department's questions regarding the unaddressed deficiencies are outlined below.

Deficiencies

1.) Trucks over 10 ton entering the facility from the West. (approach route #2)

The facility plan requires all vehicles, other than those delivering waste generated in the borough of St. Clair, to enter the facility from the East (approach route #1). The Department is still receiving citizen complaints of waste vehicles over 10 tons using the West approach route through St. Clair

Borough. Please provide additional measures to the facility plan to ensure/enforce use of the East approach route for vehicles over 10 tons and other nonlocal haulers delivering waste or construction/operational materials to the landfill.

2.) Unsafe trucks utilizing the facility

Please provide information on further measures included that address this issue. For example, if the facility is implementing sanctions to haulers if the landfill becomes aware they have been cited for safety violations by police.

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

Please provide a detailed plan to address Air Quality violations for the H₂S control system and the continued observation of landfill odors from Burma Road. This may include details of any changes of operational processes, control technology and/or equipment.

As was previously noted in the 2nd permit term extension approval issued by the Department July 30, 2025:

If the terms of this extension are not complied with, it is not guaranteed that this permit term will be extended again. Therefore, if the conditions of this extension are not complied with to the satisfaction of the Department, BRADS may have to prepare to cease all operations at the site and commence closure activities.

Therefore, you must submit a response fully addressing each of the significant technical deficiencies set forth above within 60 calendar days. If you believe that any of the stated deficiencies is not significant, instead of submitting a response to the deficiency, you have the option of asking the DEP to decide based on the information regarding the subject matter of that deficiency that you have already made available. If you choose this option regarding any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please keep in mind that if you fail to respond, your application may be denied, and BRADS may have to prepare to cease all operations at the site and commence closure activities.

Should you have any questions regarding the identified deficiencies, please contact Matthew Glogowski at (570) 830-3128.

Sincerely,

David F. Matcho

David F. Matcho, P.E.
Environmental Engineer Manager
Waste Management Program

cc: Martin and Martin, Inc. (via email: knbodner@yahoo.com)
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)