



July 30, 2024

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: Technical Deficiency Letter
Permit Renewal Application
Blythe Recycling and Demolition Site (BRADS) Landfill
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 the following remaining deficiencies. The deficiencies are based on applicable laws and regulations:

Deficiencies

Form C-1 – Compliance History Certification

1. Section C.2 – The revised permit list provided still does not include Waste Transportation Authorizations. This should be revised to include these.
2. Section D – The revised compliance history list did not include any information from 2024. Additionally, the list provided for 2023 lacked the following information: Permit/License/EPA ID#, Issuing Agency, Nature of Violation (the summaries provided did not give sufficient information about the violations), Disposition and Penalty. The list for 2023 should be revised to include this information, and the up-to-date compliance history for 2024 should be provided.

Attachment 1 - Annual Report Form

3. An updated calculation for the remaining life of the landfill should be provided. This should include both the permitted 1,500 tons per day and the 3,000 tons per day which is currently being requested through a major modification application.

Attachment 2 – Total Bond Liability

4. Please provide new bonding calculations which should include updated quotes and inflation rates.

General Information Form

5. Coordination Information 13.0 – The applicant answered no to the question “Will the project involve operations that produce air emissions?”. This response should be changed to include emissions from the hydrogen sulfide treatment system and future gas flare.

Form 46 – Relationship Between Municipal Waste Management Plans and Permits

6. The provided plan titled “Schuylkill County Municipal Solid Waste Management Plan” contains outdated information regarding BRADS and should be corrected.

Odor Mitigation

7. Due to recent odor issues, public concern, and increased odor complaints, BRADS should further evaluate the implementation of current and future gas collection at the landfill. The response should include an updated construction schedule for all odor mitigation efforts completed and planned in the future. This response should also include a gas collection plan and drawings which detail how landfill gas will be collected for landfill cells that have yet to be constructed.

You must submit a response fully addressing each of the significant technical deficiencies set forth above within 60 calendar days or the DEP may deny the application.

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.

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)