

July 23, 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: Second Technical Deficiency Letter
Major Modification for Tonnage Increase
Blythe Recycling and Demolition Site (BRADS) Landfill
Application# 101679-A223
APS# 1113025, AUTH#1483864
Blythe Township, Schuylkill County

Dear Mr. Pannucci:

The Department of Environmental Protection (DEP) has reviewed the technical deficiency response for the major modification 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.

Form 14 – Operation Plan

3. 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.

4. Based on DEP's review of BRADS' records, BRADS has a higher-than-average number of overweight trucks coming on site when comparing to the average daily tonnage. BRADS should propose additional mitigation measures to reduce the number of overweight trucks coming to the site.

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)