

February 27, 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
Major Modification for Tonnage Increase
Blythe Recycling and Demolition Site (BRADS) Landfill
Application# 101679-A223
Blythe Township, Schuylkill County

Dear Mr. Pannucci:

The Department of Environmental Protection (DEP) has reviewed the major modification application for the above referenced facility and has identified the following deficiencies. The deficiencies are based on applicable laws and regulations:

Deficiencies

Form C-1 – Compliance History Certification

(Please note these deficiencies refer to the most recent Form HW-C – Compliance History submitted to the Department with the 2022 Annual Operation Report dated June 16, 2023)

1. Section B.6 is incorrectly answered “N/A” and should be revised. This answer can reference the corporate structure diagram (Attachment 2).
2. Section C.2 – The permit list provided does not include expiration dates or Waste Transportation Authorization(s) and should be revised to include these.
3. Section C.3 references Attachment 5 for permit denials, but no permit denials are identified in that list. This answer should be revised.
4. Section D – The compliance history was only provided for the previous 5 years. An updated list should be provided, which includes the compliance history for the previous 10 years.

Form 14 – Operation Plan

1. DEP continues to receive periodic odor complaints alleging BRADS is causing odors in the community of St. Clair. DEP investigations of these complaints and DEP’s regular inspections continue to document onsite and offsite odors, specifically hydrogen sulfide type odors. BRADS should provide additional mitigation measures for these odors.

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)