



10 Highland Avenue
Chester, PA 19013
610.497.8100

May 5, 2026

Mr. Jim Horan
Commonwealth of Pennsylvania
Pennsylvania Department of Environmental Protection
Bureau of Waste Management
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Subject: Reworld Delaware Valley, LLC.
 Solid Waste Permit No. 400593
 Radiation Violation Response Letter

Dear Mr. Horan:

On April 23, 2026, the Pennsylvania Department of Environment (PADEP) Waste Management Program issued to Reworld Delaware Valley, LLC (Reworld) a violation pertaining to non-compliance associated with 25 Pa. Code Sections 283.220(a) & (b) and 25 Pa. Code Sections 283.201(b)(1), (2) & (c). According to the letter, the facility was cited for the following:

- *By accepting a load of waste containing radioactive material for processing that was intended to be rejected back to the generator, the facility failed to implement the approved plan for this load of waste in coordination with the Department's Radiation Protection Program, and therefore failed to implement the approved Radiation Protection Plan (Form X), incorporated in Permit 400593, approved on December 6, 2019, contrary to 25 Pa. Code Sections 283.220(a) & (b); and*
- *The Facility's acceptance and processing of unapproved waste and failure to operate in accordance with the approved plans and specifications, the terms and conditions of the permit, and the environmental protection acts is contrary to 25 Pa. Code Sections 283.201(b)(1), (2) & (c).*

PADEP requested that Reworld submit written correspondence identifying the circumstances under which the identified violations occurred, and the actions taken to prevent future non-compliance.

On March 23, 2026, East Penn Sanitation, Bethlehem PA, arrived at the facility with a trailer of municipal solid waste for disposal. Upon scaling into the facility, the trailer activated the facility's inbound scale radiation detection alarm. In accordance with the approved radiation plan, the scale radiation detectors are set to alarm at background plus 10 μ R/hr. When a vehicle activates the radiation alarm, an audible alarm occurs in the scale house. The scale house operator instructed the vehicle operator to park the vehicle onsite in the permitted radiation isolation area until the

vehicle dose level and isotope could be identified by either Reworld or our third-party Health Physicist.

Reworld conducted the initial scan on March 24, 2026, with the facility's portable radiation detector/isotope identifier. Due to possible shielding of the isotope by waste and/or trailer panels, Reworld obtained a very low vehicle exposure rate of 25.3 $\mu\text{R/h}$ and was unable to identify the exact isotope. The trailer was rescanned on March 26, 2026. A much lower vehicle exposure rate of 19.3 $\mu\text{R/hr}$ was obtained although the exact isotope could not be identified. Reworld contacted our Radiation Health Physicist to review the vehicle dose rates and spectra. On March 27, 2026, the Health Physicist concluded that the information provided by Reworld was consistent with Thallium-201 (TL-201), a medical isotope with a 73-hour half-life. This information was provided to PADEP for review and approval for shipment to an acceptable landfill. On March 31, 2026, PADEP did not agree with the isotope determination and asked the facility to continue providing dose rates for further analysis.

On April 3rd, the Health Physicist came on-site to perform a vehicle survey. He initially identified the isotope as Radium-226, a non-medical isotope with a very low vehicle dose reading of 36 $\mu\text{R/hr}$ and a confidence level of 74%. The Health Physicist issued a report of findings and recommended that the load be shipped back to the originator upon PADEP approval. The findings and recommendations were communicated to East Penn Sanitation. They agreed that it was best to return the load to their facility for isolation services.

On April 6, 2026, Reworld was granted approval (PA-PA-26-062) to return the trailer to East Penn Sanitation in Bethlehem for isolation. On April 10, 2026, at 05:00 am, East Penn Sanitation arrived on-site to pick up the trailer with the PADEP approval. The driver did not understand the paperwork provided to him by East Penn and proceeded to scale into the facility for disposal. When the driver proceeded to scale in, the radiation alarm was not activated in the scale house, thus clearing the trailer to proceed into the facility disposal. At approximately 08:30 am, Reworld realized that the trailer had been processed on the tipping floor and proceeded to walk the entire floor, scanning the waste to detect radiation. The portable radiation detector did not detect radiation in the waste on the tipping floor. At approximately 10:30 am, Reworld notified PADEP via email of the load status.

As stated earlier, the Reworld scale radiation detection system is set to alarm at background plus 10 $\mu\text{R/hr}$ as well as being function tested daily prior to trucks scaling in. When the trailer entered the facility on March 23rd, the alarm was activated because it detected radioactivity in the trailer. On April 10th, the scale radiation detection system did not alarm because the previously detected radiation was well below the detection limits. If the isotope was indeed Radium-226, our Health Physicist and Reworld are confident that the detector would have alarmed on April 10th as the half-life of Radium is 1,600 years. It is believed that the initial scans that determined the radioactive waste was a short-lived isotope were correct, and that it decayed to below the detection limit between March 23rd and April 10th, thus making the trailer processible at the facility. The facility reached out to the Health Physicist for an analysis of the situation based on the timeline of events. The Health Physicist agrees that the very low-dose isotope was indeed short-lived based on the decay rate observed across multiple survey dates and being non-detectable by the scale radiation system on April 10th. Given these facts, we believe that the facility complied with the requirements of the approved radiation plan when it processed waste on April 10th that did not trigger the scale radiation detectors.

As an additional safeguard against human error, the facility has implemented an additional control measure of locking the trailer's air lines when staged within the permitted radiation isolation area to prevent unauthorized movement of vehicles containing radioactive materials.

Reworld Delaware Valley is contesting the Notice of Violation based on the above information and requests the Department to review the timeline of events and attached reports/emails from the Health Physicist. Reworld is requesting a meeting with PADEP to discuss these events and the information presented further.

If you have any questions, please contact me or Allie Jozwik at (717) 308-8742.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. Piscitelli".

Alex Piscitelli
Facility Manager

cc:

Kim Bradford, Reworld
George Drew, Reworld
File – Del Valley Solid Waste



RAD/COMM SYSTEMS CORP.

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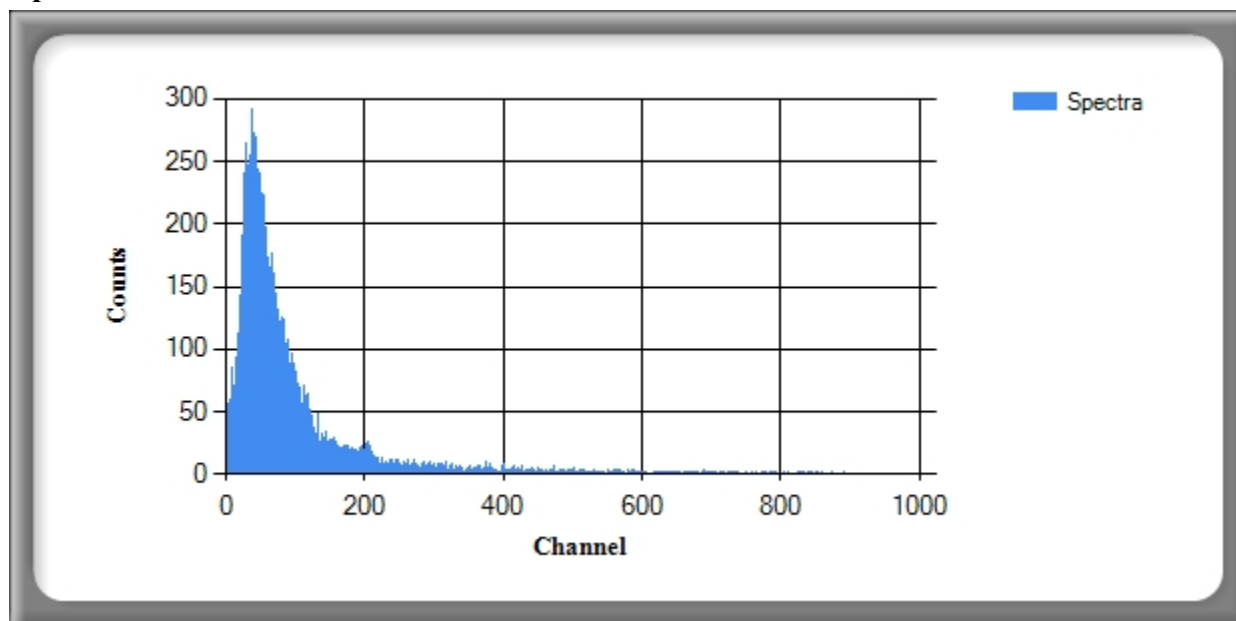
Syclone 50167 Report

Date	3/24/2026
Time	6:19 AM
Acquisition Time	55 Sec.
Spectra Number	52
Temperature	13.875 'C
Label	
Location	0° 0' 0" 0° 0' 0"

Identified Isotopes :

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Spectra :



Unidentified Peaks :

Peak Channel	Peak Energy
204130.62	84.28 keV

Comments :

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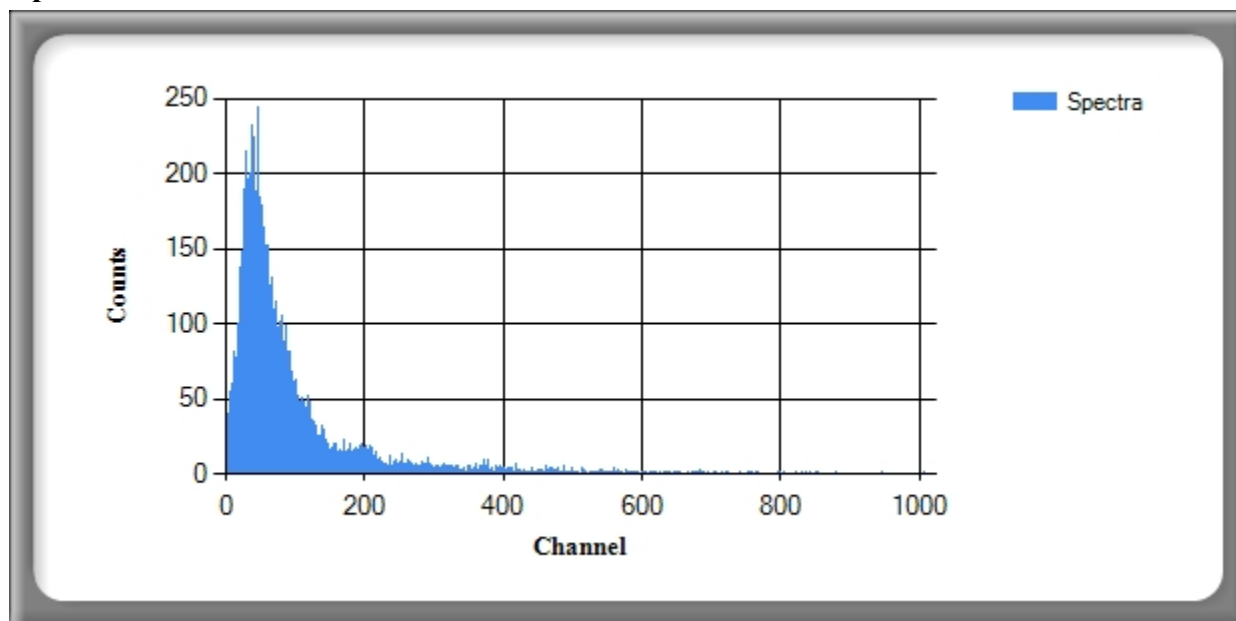
Syclone 50167 Report

Date	3/26/2026
Time	2:59 PM
Acquisition Time	55 Sec.
Spectra Number	53
Temperature	29.0625 'C
Label	
Location	0° 0' 0" 0° 0' 0"

Identified Isotopes :

--

Spectra :



Unidentified Peaks :

Peak Channel	Peak Energy
204129.96	86.32 keV

Comments :

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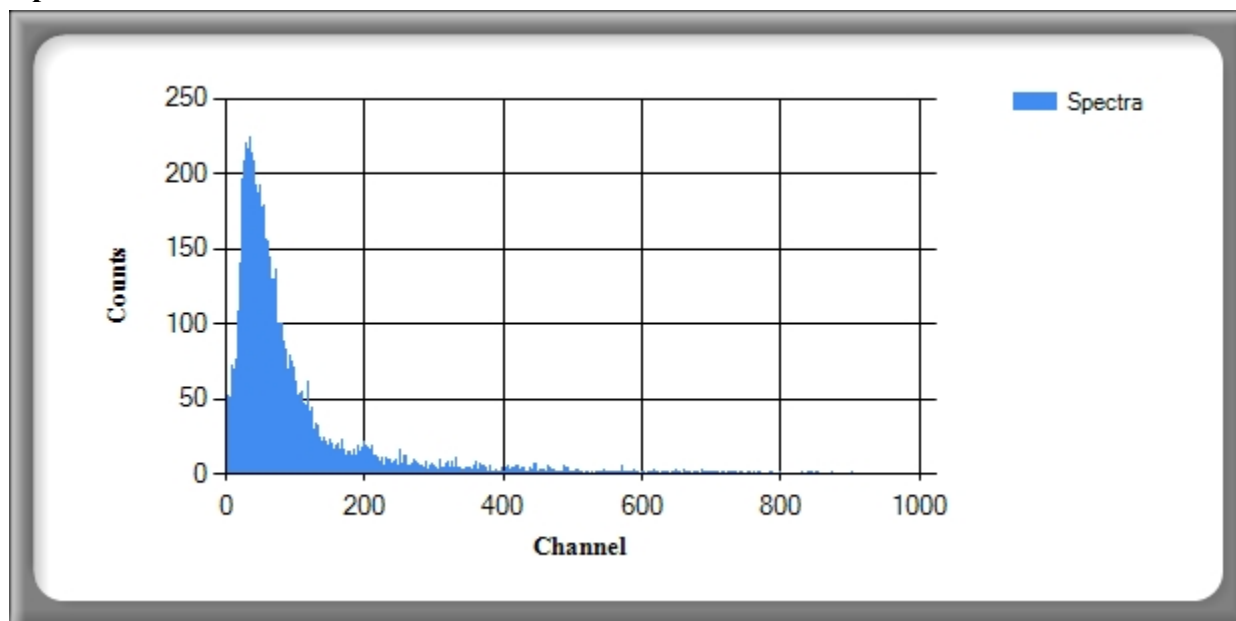
Syclone 50167 Report

Date	3/26/2026
Time	3:01 PM
Acquisition Time	55 Sec.
Spectra Number	54
Temperature	29.125 'C
Label	
Location	0° 0' 0" 0° 0' 0"

Identified Isotopes :

--

Spectra :



Unidentified Peaks :

Peak Channel	Peak Energy

Comments :

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Jozwik,Alexandra

From: jgfong@aol.com
Sent: Friday, March 27, 2026 8:08 AM
To: Rosario,Adam; Jozwik,Alexandra; Whitworth,Patrick
Cc: Bowman,Charles; Schutz,Timothy J
Subject: RE: Hot Load Identification

*** Warning: External message - exercise caution. ***

Hi Folks,

I looked at the peaks and did a decay calculation. Both methods point to Tl-201. Medical isotope, 73 hour half life low energy, around 80 keV.

That is the best match for this vehicle.

Thank you,

Jim

From: Rosario,Adam <ARosario2@reworldwaste.com>
Sent: Thursday, March 26, 2026 4:14 PM
To: James Fongheiser <jgfong@aol.com>; Jozwik,Alexandra <ajozwik@reworldwaste.com>; Whitworth,Patrick <pwhitworth@reworldwaste.com>
Cc: Bowman,Charles <CBowman@reworldwaste.com>; Schutz,Timothy J <TSchutz@reworldwaste.com>
Subject: Hot Load Identification

Hey Jim,

We are in need of your assistance as usual. We have a hot load that came on site and we cant identify the isotope. I even switched libraries from Medical to Waste to Standard and couldn't identify. I have attached 3 spectrums for you to view along with dose rates below. If you could let us know what you come up with when you have the time. Thank you!

3-24-26 @ 7:19 am 25.3 uR/h

3-26-26 @ 4:01 pm 19.3 uR.h

Adam Rosario

Tipping Floor Supervisor

Reworld
.....

Reworld Delaware Valley

10 Highland Ave, Chester, PA 19013

Office : 717-323-6560

Email : arosario2@reworldwaste.com

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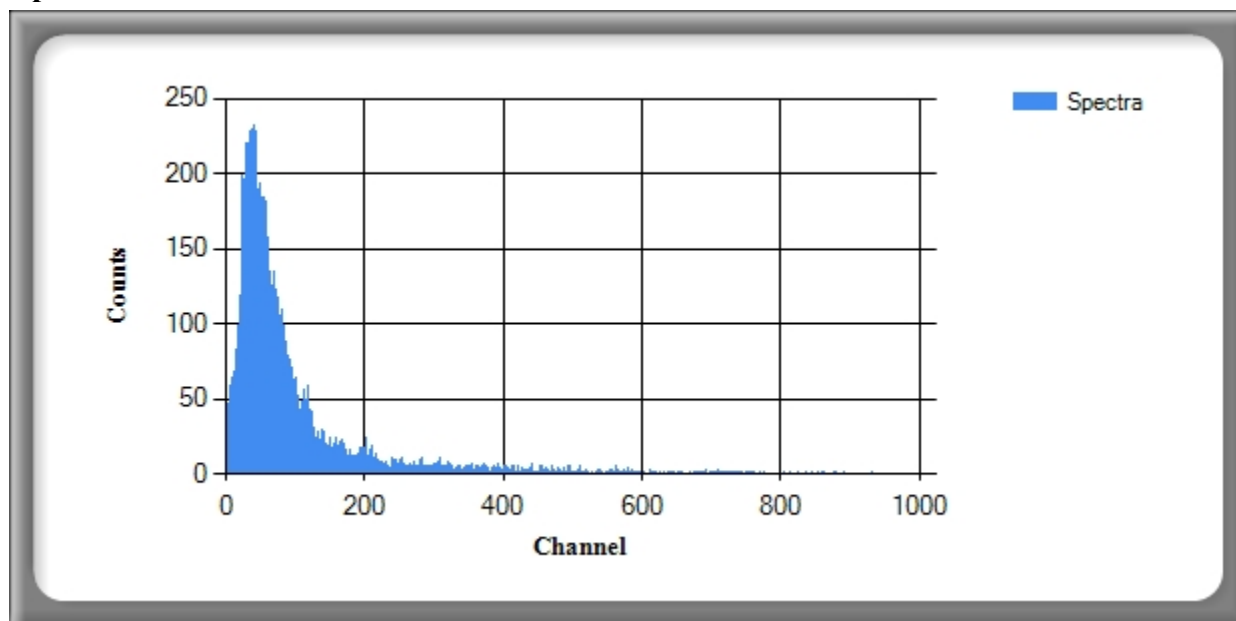
Syclone 50167 Report

Date	3/31/2026
Time	12:08 PM
Acquisition Time	55 Sec.
Spectra Number	55
Temperature	24.3125 'C
Label	
Location	0° 0' 0" 0° 0' 0"

Identified Isotopes :

--

Spectra :



Unidentified Peaks :

Peak Channel	Peak Energy

Comments :

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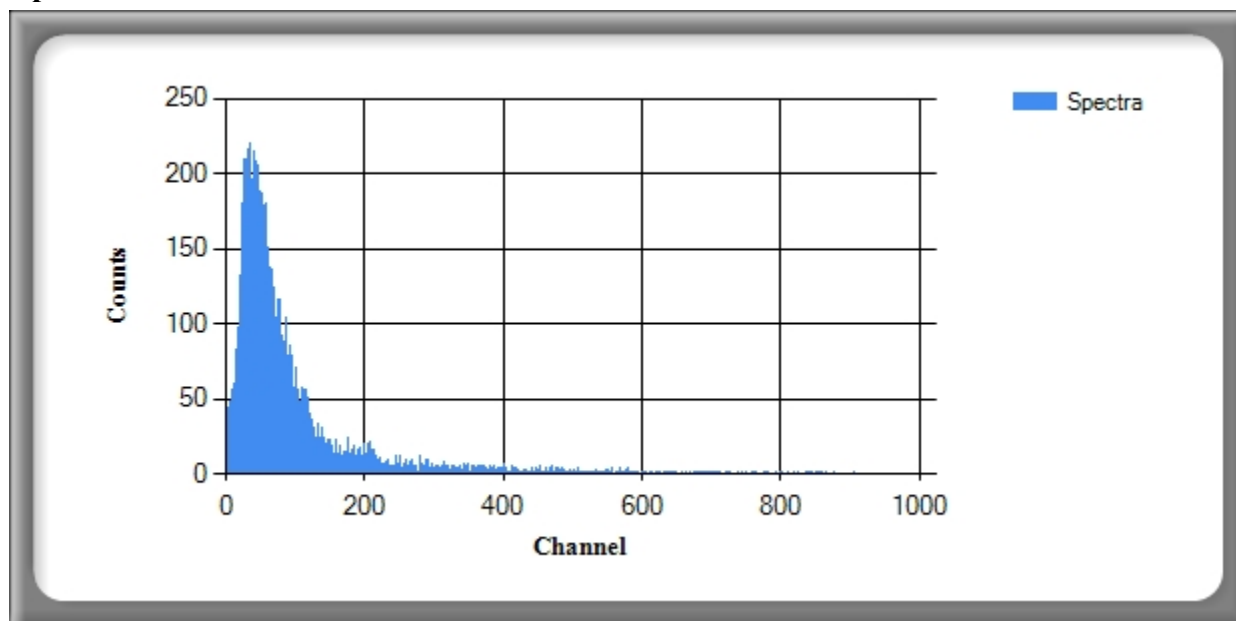
Syclone 50167 Report

Date	3/31/2026
Time	12:10 PM
Acquisition Time	55 Sec.
Spectra Number	56
Temperature	24.5625 'C
Label	
Location	0° 0' 0" 0° 0' 0"

Identified Isotopes :

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Spectra :



Unidentified Peaks :

Peak Channel	Peak Energy
204129.44	87.91 keV

Comments :

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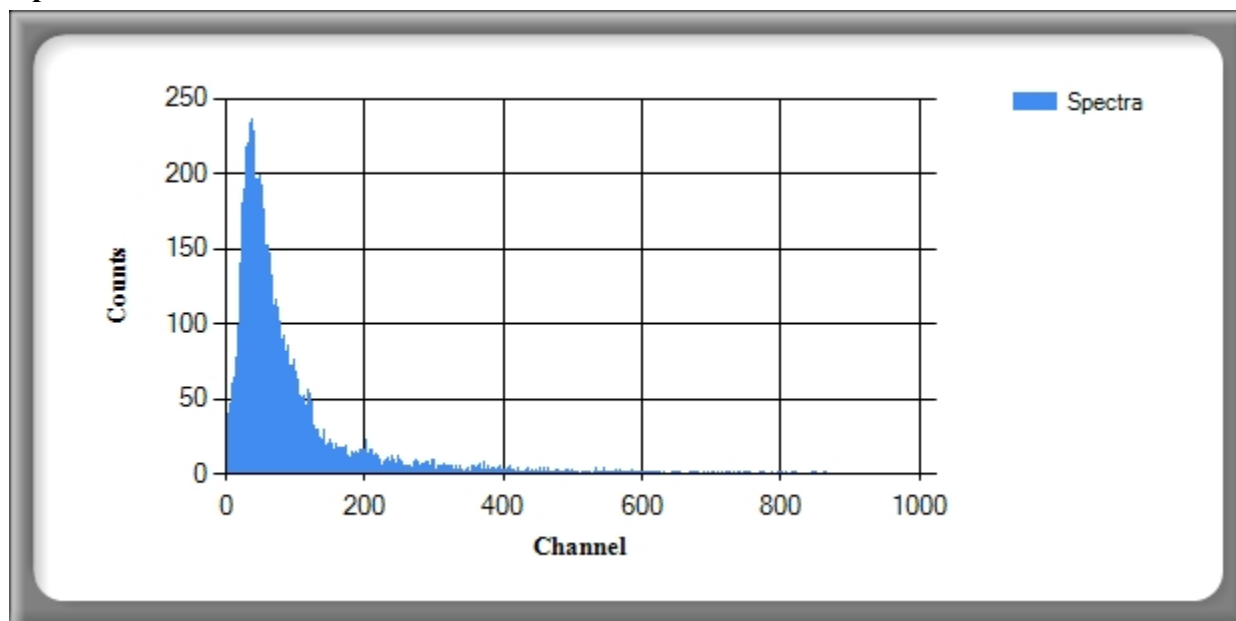
Syclone 50167 Report

Date	4/2/2026
Time	3:07 PM
Acquisition Time	55 Sec.
Spectra Number	57
Temperature	19.8125 'C
Label	
Location	0° 0' 0" 0° 0' 0"

Identified Isotopes :

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Spectra :

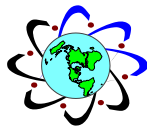


Unidentified Peaks :

Peak Channel	Peak Energy
204132.38	78.91 keV
204126.09	98.17 keV

Comments :

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FROM: Jim Fongheiser

1019 Nicholas Drive, West Chester, PA 19380

phone: (610) 745-6901

To : **Adam Rosario** Date: 4/3/26
Reworld, Delaware Valley
10 Highland Ave., Chester, Pa.

From : Jim Fongheiser

Subject : **Vehicle Survey at Delaware Valley**

Mr. Rosario,

The following is a summary of my visit to your facility on 4/3/26.

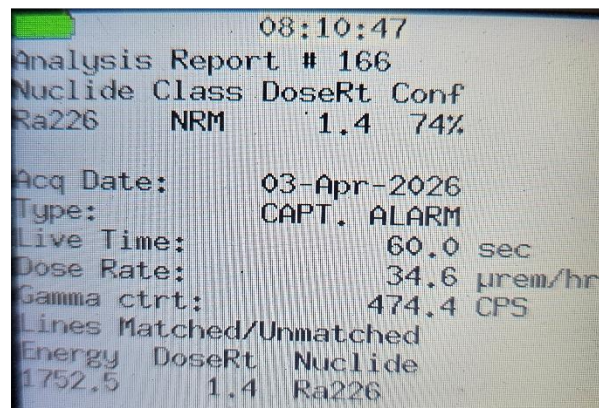
I was asked to be on site to perform a survey and isotopic ID on a vehicle that had alarmed the scale radiation monitor last week. It had been difficult to ID the isotope.

The vehicle is a large, walking floor trailer. The trailer was located in the designated area when I arrived this morning. Adam met me and showed me the hot spot. It was on the driver side, about 10 feet up on the 7th small panel from the front. I started up my Ludlum 702 MCA, performed the auto-calibration and collected a new background spectrum. I then found the hot spot location, with the assistance of a ladder, where Adam had described it, and found a peak dose rate of 36 uR/hr.

I performed a succession of scans on and near the hot spot to ID the isotope. It identified as Ra-226, utilizing a peak at 1,752.5 keV. The scan had a percent confidence of 74%

Truck Survey

Instrument used: Ludlum Model 702 MCA, SN: RD1105
Background: 7 uR/hr
Contact dose rate: up to 36 uR/hr on contact (0.036 mR/hr)
Isotopic ID: Ra-226. 74% confidence



I spoke with Adam in the scale house and reviewed the scan information.

Discussion:

Adam's prep and information previously gathered was correct. His instructions for the location were easy to follow. The isotope was verified as Ra-226. The source presents a relatively low dose rate outside of the trailer, making it difficult to ID. It does require a ladder to get to the location. The source is not detectable from a short distance away.

As Ra-226, this could be a naturally occurring source such as a rock or sand/sludge or it could be a small device such as a compass, dial or even a smoke detector.

Recommendation:

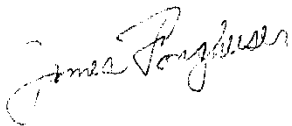
I do not recommend trying to retrieve the Ra-226 source from this load at this location. It is large volume, and a source of this nature could be very small. This operation could tie up a significant area of your tipping floor for a long time, with the worst case of not being able to find it at all. The tipping floor is being tightly managed now for volume and this would be an extreme burden on this facility. Because of the location in the trailer, it would be difficult to follow the source as it is "walked" off.

I recommend rejecting this load back to the originator with a DEP approved DOT exemption form.

Any exposure from this source while on the trailer, to workers at this or other facilities, including the driver, would be negligible, and most likely, not even measurable.

Please call me if you have any further questions regarding this report.

Thank You,

A handwritten signature in cursive script, appearing to read "Jim Fongheiser".

Jim Fongheiser, Health Physicist
Cell: 610-745-6901

Annex A DOT-SP 11406 SHIPMENT APPROVAL FORM

Approval Number _____ (Refer to SP 11406, paras. 8a-8b)

This shipment of waste contains unidentified radioactive material causing low levels of radiation outside the transport vehicle. Shipment is under Special permit DOT-SP 11406 without a determination of materials meeting or not meeting the regulatory definition of radioactive material. The shipment is a minor radiological concern based on considerations of the U.S. Department of Transportation and the state official signing this shipment approval document.

In case of an emergency, notify the National Response Center @ 800-424-8802 and the ⑧ authorizing official and give the Special permit No. and Approval No.

SECTION 1 - DETAILS of DETECTION SITE, MATERIALS, ORIGIN, and DESTINATION**① Detection Facility**

Facility name: _____ Type: _____

Address: _____

Contact person: _____ Email: _____ Phone: _____

Description of waste and release risks: _____

Radiation Measurement

Survey Date (YYYY-MM-DD): _____ Survey Time (HH:MM 24hr): _____

Bkg. reading: _____ Units: _____ Vehicle cab (max): _____ Units: _____

Load (max): _____ Units: _____

Location of highest reading on vehicle and additional info:

Instrument manufacturer/model: _____

Surveyor's name: _____ Organization: _____ Phone: _____

② Carrier

Company name: _____ Operator: _____

Mode: _____ Vehicle type: _____ Vehicle I.D. #: _____

Contact person: _____ Email: _____ Phone: _____

③ Shipment Origin

Company name: _____

Address: _____

Contact person: _____ Email: _____ Phone: _____

SP-11406 Approval Number _____

Page 2

④ Destination for Identification and Disposition ☐ Check if same as Shipment Origin ③*If carrier and shipper to this location are different than ②, provide their information in "Section 5 - Remarks, Other Information".*

Company name: _____

Address: _____

Contact person: _____ Email: _____ Phone: _____

SECTION 2 - RADIATION CONTROL OFFICIALS**⑤ Origin State Official**

Name: _____ Organization: _____

Phone: _____ Email: _____

⑥ Transit State(s) Official(s)*

Name: _____ Organization: _____

Phone: _____ Email: _____

Name: _____ Organization: _____

Phone: _____ Email: _____

Additional Transit State information should be listed in the "Section 5 - Remarks, Other Information".*⑦ Destination State Official** ☐ Check if same as Origin State Official ⑤

Name: _____ Organization: _____

Phone: _____ Email: _____

SECTION 3 - APPROVAL of SHIPMENT and SPECIAL CONDITIONS**⑧ Detection State Official** ☐ Check if same as Origin State Official ⑤

Name: _____ Title: _____ Organization: _____

Phone: _____ Email: _____

Special Conditions:

Date: _____ Signature: _____

*DOT-SP process initiated, but not completed. Provide comments in "Section 5 - Remarks, Other Information".*

SP-11406 Approval Number _____

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SECTION 4 - IDENTIFICATION and DISPOSITION INFORMATION at DESTINATION

Identification Details: _____

Radionuclide: _____ Other (e.g. Lu-177): _____

Disposition Details: _____

⑨ Disposition State Official ☐ *Check if same as Destination State Official ⑦*

Name: _____ Date: _____

Title: _____ Organization: _____

Phone: _____ Email: _____

SECTION 5 - REMARKS, OTHER INFORMATION:

In case of an emergency, notify the National Response Center @ 800-424-8802 and the
⑧ authorizing official and give the Special permit No. and Approval No.

SECTION 6 - RECORD of TRANSMITTALS
(Circumstances may influence distribution)

Shipment Approval – Date sent by ⑧ to ①, ②, ③, ④, ⑤, ⑥, and ⑦:

Record of Identification and Disposition – Date Sent by ⑨ to ⑤, ⑦, ⑧, and other:

Completed DOT SP Form – Date Sent or Uploaded by ⑨ to OED CRCPD & Other:

If “Other,” please provide details in the “Section 5 - Remarks, Other Information”.

RADIOACTIVE

US DOT SP-11406

Shipment Approval #:

- - -

Date: _____

RADIOACTIVE

US DOT SP-11406

Shipment Approval #:

- - -

Date: _____

Jozwik,Alexandra

From: jgfong@aol.com
Sent: Friday, April 10, 2026 10:26 AM
To: Jozwik,Alexandra; Rosario,Adam
Cc: Bradford,Kimberly
Subject: RE: Trailer Survey

*** Warning: External message - exercise caution. ***

Good morning, Adam,
Thank you for calling me this morning concerning the vehicle.
I understand that:

1. It was intended that it would be sent back to the hauler's facility
2. It scaled in at about 5 AM this morning and did not generate an alarm.
3. Because there was no alarm, the driver proceeded to the tip floor and dumped the load, which was not the agreed upon plan.
4. When you learned of this, you surveyed on the tip floor and did not find any dose rates above background.

As to why this did not generate an alarm:

Originally the scans you collected had a peak near 80 keV and seemed to decay at a rate approximating Tl-201, which has a half-life of 73 hours. DEP wanted that to be verified and you asked me to come on site to re-survey.. The dose rates I found were much lower than yours and approximately 30-35 uR/hr. My first survey did not come up with any obvious peaks. A second survey identified Ra-226 at a medium confidence level and I recommended rejecting the load back to the originator.

The fact that this load did not generate an alarm today when it scaled in suggests that the isotope may have been short-lived, and it had a dose rate very low already when I tried to identify it. Tl-201 would decay like this. We have discussed in the past that there is some art involved in these identifications and low dose rates can make it more difficult.

I believe that there will be no exposure consequence from this event.
Thank you,
Jim