

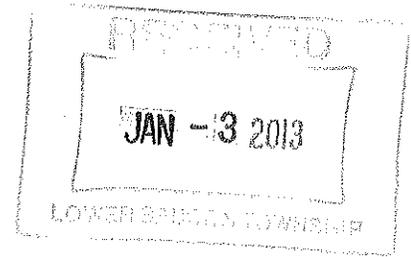


pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BETHLEHEM DISTRICT OFFICE

January 2, 2013



Lower Saucon Township Manager
3700 Old Philadelphia Pike
Bethlehem, PA 18015

Attn: Mr. Jack Cahalan

Re: IESI PA Bethlehem Landfill
I.D. #100020
Lower Saucon Township, Northampton County

Dear Mr. Cahalan:

Please find enclosed a copy of the report of an inspection performed by this District Office at the IESI PA Bethlehem Landfill, located in your municipality. A copy of the inspection report is being provided to you pursuant to the provisions of Section 1101(a)(1) of Act 101, the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988.

If you have any questions, please feel free to contact me at 610-861-2136.

Sincerely,

Walter F. Govern III
Solid Waste Specialist
Waste Management Program

ROUTING

- Council
- Manager *orig*
- Asst. Mgr.
- Zoning
- Finance *Enclosure*
- Police
- P. Works
- P/C
- P & R
- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EMC
- Other

4530 Bath Pike | Bethlehem, Pennsylvania 18017-9074

610.861.2136 | Fax 610-861-2072

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Website

DEP01-02-13



INSPECTION REPORT – MUNICIPAL WASTE LANDFILL

Site I.D. 100020
 Site Name IESI PA BETHLEHEM LANDFILL
 Address 2335 APPLEBUTTER RD
 Municipality 8924 LOWER SAUCON
 Responsible Official SANUEL DONATO, JR.
 Person Interviewed AL SCHLEYER
 Inspector WALTER F. GOVERN
 eFACTS ID # PF 268729 SF 266826

Telephone # _____
 Operator Name IESI PA BETHLEHEM LANDFILL
 Address 2335 APPLEBUTTER RD
 County NORTHAMPTON
 Title PA DISTRICT MANAGER
 Title COMPLIANCE MANAGER
 Title SOLID WASTE SPECIALIST

Comment: Routine Complete Inspection

Inspection Date: 12/20/2012 Type: RTNC Results: NO VIOLS Resolved: / /
 Permit Expiration Date: 4/18/13 Days/Week Operated: 6 Max. Daily Volume: 1800

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				REVISION	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
GENERAL PROVISIONS							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required insurance in effect (expiration date <u>12/31/2012</u>)	<input type="checkbox"/>	271.371	1
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation in accordance with approved plans and permit.	<input type="checkbox"/>	273.201(c)(2)	2
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation within permit boundaries (vertical and horizontal).	<input type="checkbox"/>	273.201(c)(2)	3
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disposal Timing and sequence as per Section 273.112(1).	<input type="checkbox"/>	273.201(c)(2)	4
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No unapproved wastes or liquids.	<input type="checkbox"/>	273.201(d)-(m)	5
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Isolation distances are adhered to.	<input type="checkbox"/>	273.202(a)	6
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facilities certification requirements followed.	<input type="checkbox"/>	273.203(a), (b)	7
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written Department approval of new construction prior to waste disposal.	<input type="checkbox"/>	273.203(c)	8
DAILY OPERATIONS							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper signs posted.	<input type="checkbox"/>	273.211(a)	9
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site perimeter clearly marked and grid coordinate system in use.	<input type="checkbox"/>	273.311(b)-(d)	10
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper barriers installed around site and access controlled when attendant not present.	<input type="checkbox"/>	273.212(a)-(i)	11
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access roads maintained and negotiable by collection vehicles.	<input type="checkbox"/>	273.213(a)-(i)	12
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved means of measuring and inspected waste utilized.	<input type="checkbox"/>	273.214(a), (b)	13
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate equipment on-site and stand-by equipment available.	<input type="checkbox"/>	273.215(a), (b)	14
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vehicles directed promptly to unloading area and promptly unloaded.	<input type="checkbox"/>	273.216(a), (b)	15
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Solid waste spread and compacted as approved by Department as part of permit.	<input type="checkbox"/>	273.216(c)	16
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements fugitive air contaminant control/measures and prevents and controls air pollution including no exceeding of ambient air quality standards, no open burning, and minimizing generation of fugitive dust emissions from facility.	<input type="checkbox"/>	273.217(a)	17
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator complies with Air Quality Plan approval and Air quality Operating Permit.	<input type="checkbox"/>	273.217(b)	18

Site Name	IESI PA BETHLEHEM LANDFILL
ID Number	100020
Date	12/202012

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
DAILY OPERATIONS (Cont'd)							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not cause or allow attraction, harborage, or breeding of vector.	<input type="checkbox"/>	273.218(a)	19
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements nuisance minimization and control plan.	<input type="checkbox"/>	273.218(b)(1)	20
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator performs regular, frequent, and comprehensive site inspections to reduce potential for offsite odors.	<input type="checkbox"/>	273.218(b)(2)	21
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator promptly addresses and correct problems and deficiencies discovered during inspections.	<input type="checkbox"/>	273.218(b)(3)	22
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements nuisance minimization and control plan to minimize and control other conditions harmful to the environment or public health, or which create safety hazards, odors, dirt, noise, unsightliness and other public nuisances.	<input type="checkbox"/>	273.218(c)	23
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not receive solid waste at a landfill in excess of the maximum or average daily volume approved in the permit.	<input type="checkbox"/>	273.221(a)	24
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements radiation protection action plan.	<input type="checkbox"/>	273.223(a)	25
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator monitors incoming waste in accordance with Department's guidance or in a manner at least as protective of the environment, facility staff and public health and safety.	<input type="checkbox"/>	273.223(b)	26
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Radiation detector elements shall be as close as practical to wasteload and in appropriate geometry to monitor the waste.	<input type="checkbox"/>	273.223(c)	27
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator has portable radiation monitors capable of determining the dose rate and presence of contamination of a vehicle that has caused an alarm. Upon exceedance of alarm level, a radiological survey of the vehicle is performed.	<input type="checkbox"/>	273.223(d)	28
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator notifies Department immediately and isolates vehicle when radiation dose rates are exceeded.	<input type="checkbox"/>	273.223(e)	29
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Monitoring equipment is calibrated at frequency specified by manufacturer, but not less than once a year.	<input type="checkbox"/>	273.223(f)	30
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If radioactive material is detected, vehicle containing material shall not leave facility without written Department approval and an authorized federal Department of Transportation exemption form.	<input type="checkbox"/>	273.223(g)	31
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uniform cover of the approved daily cover material is placed on exposed solid waste at the end of each working day or at the end of every 24 hours, whichever interval is less.	<input type="checkbox"/>	273.232(a)	32
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If intermediate cover requires revegetation, it is established within 30 days.	<input type="checkbox"/>	273.233(e)	33
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Slopes constructed during daily landfilling and intermediate cover activities may not exceed 50 percent.	<input type="checkbox"/>	273.233(f)	34
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not cause or allow waste pollution within or outside the site from operation of the facility.	<input type="checkbox"/>	273.241(a)-(c)	35
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator has restored or replaced adversely affected water supply with an alternative source of like quantity and quality.	<input type="checkbox"/>	273.245(a)	36
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Temporary water supply is provided within 48 hours.	<input type="checkbox"/>	273.245(b)	37
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Permanent water supply is provided within 90 days.	<input type="checkbox"/>	273.245(c)	38
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No waste 15 feet of inside top of the lined perimeter berm.	<input type="checkbox"/>	273.252(e)	39

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
DAILY OPERATIONS (Continued)							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lined perimeter berm 4 ft. high constructed and maintained along edge of the lined disposal area.	<input type="checkbox"/>	273.252(f)	40
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Edge of liner clearly marked.	<input type="checkbox"/>	273.252(g)	41
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Alternate leachate recirculation method may be used if approved if one of the liner systems is a composite liner.	<input type="checkbox"/>	273.274(b)	42
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Underground pipes used to transport leachate to leachate storage impoundments or tanks equipped with secondary containment or comply with 245.445.	<input type="checkbox"/>	273.275(g)	43
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator isolates coal seams, coal outcrops and coal refuse from waste deposits to prevent combustion of waste and damage to liner.	<input type="checkbox"/>	273.291(a)	44
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mine openings within site sealed as approved by Department.	<input type="checkbox"/>	273.291(b)	45
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements plan for controlling potential damage from subsidence submitted and approved under 273.120.	<input type="checkbox"/>	273.291(c)	46
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Landfill designed, constructed, maintained and operated to prevent and minimize potential for fire, explosion, or release of solid waste constituents into air, water, or soil of the Commonwealth.	<input type="checkbox"/>	273.301	47
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency equipment including portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment available. For fire equipment requiring water, facility has a water supply of or adequate quantity and pressure to supply the equipment.	<input type="checkbox"/>	273.302(a)	48
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency equipment tested and maintained.	<input type="checkbox"/>	273.302(c)	49
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate space maintained to allow unobstructed movement of emergency personnel and equipment.	<input type="checkbox"/>	273.302(d)	50
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Litter controlled/collected and barriers/fences in place.	<input type="checkbox"/>	273.220(a)-(c)	51
COVER/SLOPES/REVEGETATION							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily/intermediate cover meets performance and design requirements.	<input type="checkbox"/>	273.232(b), 273.233(b), (c)	52
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minimum 5 day supply of daily and intermediate cover maintained on-site.	<input type="checkbox"/>	273.232(c) & 273.233(d)	53
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Intermediate cover applied within time limits.	<input type="checkbox"/>	273.233(a)	54
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Intermediate slopes do not exceed 50%.	<input type="checkbox"/>	273.232(d)	55
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cap placed over entire surface of final lift meets performance standards.	<input type="checkbox"/>	273.234(a)(1)	56
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final cover meets performance and design requirements; applied within time limits.	<input type="checkbox"/>	273.234(b)-(e)	57
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final slopes stable and erosion controlled.	<input type="checkbox"/>	273.234(f)	58
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final slopes graded 3-15% or terraced to 33% as approved.	<input type="checkbox"/>	273.234(g)	59
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minimum revegetation and successful revegetation requirements adhered to.	<input type="checkbox"/>	273.235(a)-(e) & 273.236(a), (b)	60
WATER QUALITY PROTECTION							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Surface and groundwater treatment facilities properly operated and maintained.	<input type="checkbox"/>	273.241(b)	61
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Surface water percolation minimized/prevented.	<input type="checkbox"/>	273.242(b)(1) & 273.234(e)(4)	62

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Soil erosion and sedimentation controls designed and implemented as per approved plans; gullies over nine inches repaired.	<input type="checkbox"/>	273.242(a)-(c)	63
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sedimentation ponds and discharge structures designed, constructed, operated, and maintained in accordance with Chapters 273, 102, and 105.	<input type="checkbox"/>	273.243(a)-(g) & 273.244	64
LINER SYSTEM							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Liner system designed, constructed, operated, and maintained when required.	<input type="checkbox"/>	273.251(a), (b)	65
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Edge of liner requirements adhered to (i.e., no waste within 25 feet of adjacent liner, 4 feet high lined berm, to prevent lateral escape of leachate, adequate spacing on inside of berm to collect stormwater and sediment).	<input type="checkbox"/>	273.252(d)	66
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate detection zone monitored weekly.	<input type="checkbox"/>	273.255(c)	67
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover protects primary liner and leachate collection system and allows free flow of leachate into the collection system.	<input type="checkbox"/>	273.257(a)	68
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover meets minimum requirements and at least 18 inches thick.	<input type="checkbox"/>	273.257(b)	69
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collection system within protective cover meets minimum requirements.	<input type="checkbox"/>	273.258(a), (b)	70
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.	<input type="checkbox"/>	273.259(a)-(d)	71
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8 feet of select waste placed over protective cover.	<input type="checkbox"/>	273.260	73
LEACHATE TREATMENT							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collected and handled through Department approved method(s).	<input type="checkbox"/>	273.272(a)-(c)	74
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate transportation requirements adhered to.	<input type="checkbox"/>	273.273(a)-(c)	75
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cessation of site operation if alternate leachate handling not available.	<input type="checkbox"/>	273.273(d)	76
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate treatment system permitted and fully operational at least 3 years before closure.	<input type="checkbox"/>	273.273(e)	77
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate recirculation in accordance with regulations.	<input type="checkbox"/>	273.274(1)-(4)	78
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallons, whichever is greater.	<input type="checkbox"/>	273.275(a)-(f)	79
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate flow rate measured daily; analyzed quarterly.	<input type="checkbox"/>	273.276(a)-(b)	80
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Department notified when remedial action(s) required.	<input type="checkbox"/>	273.277(1)-(4)	81
WATER QUALITY MONITORING							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved monitoring system installed and maintained.	<input type="checkbox"/>	273.281(a), (b) & 273.283	82
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quarterly and annual monitoring requirements adhered to and results submitted Department within time constraints.	<input type="checkbox"/>	273.284 & 273.285	83
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Groundwater assessment plan submitted and implement as required.	<input type="checkbox"/>	273.286(a)-(g)	84
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Groundwater abatement plan submitted and implemented as required.	<input type="checkbox"/>	273.287(a)-(f)	85
RECORDKEEPING AND REPORTING							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operational records maintained, available and submitted as required.	<input type="checkbox"/>	273.288 & 273.311-273.313	86
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily Operational Records kept in accordance with regulations for the life of the facility bond or longer if necessary.	<input type="checkbox"/>	273.311(d)	87

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator submits quarterly operation report.	<input type="checkbox"/>	273.312	88
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator submits annual operation report with fee.	<input type="checkbox"/>	273.313	89
				MINERALS AND GAS	<input type="checkbox"/>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Gas venting and monitoring in accordance with approved plans.	<input type="checkbox"/>	273.292(a)-(d)	90
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Combustible gas levels not exceeded.	<input type="checkbox"/>	273.292(e)	91
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Forced gas venting if required.	<input type="checkbox"/>	273.292(f)	92
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Gas recovery conducted as per approved plan and §273.293, including annual analysis.	<input type="checkbox"/>	273.293(a), (b)	93
				EMERGENCY PROCEDURES			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Contingency plan implemented if there is an emergency.	<input type="checkbox"/>	273.303(a)-(c)	94
				RECYCLING			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator shall salvage and recycle waste in accord with recycling plan. (273.196)	<input type="checkbox"/>	273.331(a)	95
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Salvaging and recycling controlled by operator and prevents interference within operations and prevents health hazardous nuisance.	<input type="checkbox"/>	273.331(b)	96
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Salvaged materials stored in an approved area or transported offsite.	<input type="checkbox"/>	273.331(c)	97
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drop off center established for at least three recyclables.	<input type="checkbox"/>	273.332(a)	98
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drop off center properly located, contains bins or containers, open at least 8 hours per week and 4 hours during evenings or weekends.	<input type="checkbox"/>	273.332(b), (c)	99
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved public notice of availability of drop off center availability is provided.	<input type="checkbox"/>	273.332(d)	100
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	On or before January 15 each year, operator informs municipality in writing of weight and type of materials recycled previous year.	<input type="checkbox"/>	273.332(e)	101
				SPECIAL HANDLING AND RESIDUAL WASTES			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special handling and residual wastes disposed with prior Department approval, and in accordance with permit and Chapter 273.	<input type="checkbox"/>	273.501	102
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Infectious waste disposal restrictions adhered to.	<input type="checkbox"/>	273.511(a)-(d)	103
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chemotherapeutic waste disposal restrictions adhered to.	<input type="checkbox"/>	273.512	104
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sewage sludge co-disposal and monofill requirements followed.	<input type="checkbox"/>	273.513	105
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sewage sludge sampling requirements adhered to and sludge meets standards for control of pathogens, vectors, and odors.	<input type="checkbox"/>	273.513(c)	106
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disposal of municipal waste incineration ash in landfill or landfill cell that meets Chapter 273 requirements.	<input type="checkbox"/>	273.514(a)	107
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ash residue disposal in dedicated landfill or landfill cell unless co-disposal in accordance with Chapter 273 (including leachability treatment).	<input type="checkbox"/>	273.514(b)	108
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ash residue covered immediately or as approved by the Department.	<input type="checkbox"/>	273.514(c)	109



INSPECTION REPORT COMMENTS

Date of Inspection 12/20/2012 Identification Number 100020

Company/Facility/Site Name IESI PA BETHLEHEM LANDFILL

Comments:

On December 20, 2012, a routine complete inspection was conducted at IESI PA Bethlehem Landfill (IESI). Representing the PA Department of Environmental Protection (Department) was Solid Waste Specialist Walter F. Govern III (this inspector). Representing IESI PA Bethlehem Landfill (IESI) during this inspection was Jill Hurst, Weighmaster, and Al Schleyer, Compliance Manager via phone.

Included during this routine complete inspection is an evaluation of the resolutions to the concerns mentioned in the previous report dated 08/30/2012.

ITEMS OF CONCERN SPECIFIED IN THE INSPECTION DATED AUGUST 30, 2012

"5(a). August 4th Storm Event - Reporting Requirement"

IESI submitted to the Department the required reporting documentation. A copy of the report is attached to this inspection report.

"8. IESI PPC Plan"

IESI is currently working on upgrading the electronic interfaces to the pumps in the leachate pump houses. The purpose of this upgrade is to allow a generator to be hooked up to the pumps to run them in the event of a power outage. Mr. Schleyer wanted to include this in the new PPC Plan update resulting in a delay of finalizing the PPC Plan. Mr. Schleyer stated that he will get the PPC Plan updated and if it needs to be amended later he will do that as well.

EMERGENCY STORM APPROVALS

IESI is using its storm approval conditions. IESI is approved to increase its maximum daily tonnage from 1,800 tons per day to 2,300 tons per day. Increase average daily tonnage from 1,375 tons per day to 1,800 tons per day. And extend operating hours to include being open on Sunday from 0700 hrs to 1600 hrs. This approval expires on December 31, 2012. During the time of this inspection, IESI was operating within the conditions set forth in the emergency storm approval. IESI is not using the extended hours condition of the approval.

ADDITIONAL OBSERVATIONS

Prior to entering the landfill for the inspection, an odor patrol was conducted along Applebutter Road, throughout Steel City and around the north side of the landfill on Riverside Drive. No landfill related odors were observed during this odor patrol. No malodors were observed during this inspection. IESI appears to be implementing their Nuisance Minimization and Control Plan as required.

The entrance road to the facility and the access roads to the working face had accumulated some soil. IESI personnel delayed use of the water truck in the morning due to temperatures being below freezing. The water truck was running during the time of this inspection. Mr. Schleyer stated that they were going to run the street sweeper after using the water truck to clean the roads. No windblown litter was observed in the trees within the landfills fences. No windblown litter was observed on the slopes of the landfill during the time of this inspection.

The flare was in operation at IESI during the time of this inspection. It was burning landfill gas at a temperature of 1680 °F at a flow rate of 2161 scfm.

Cell 4E is the area that is accepting waste during the time of this inspection. There were four trucks dumping at the working face during the time this inspector was observing the working face. Six trucks were waiting to dump.

IESI is prepping the south slope for scheduled capping activities. IESI estimates that more than two acres of the south slope will be capping prior to the end of this year (weather permitting). Areas to be capped cover parts of Cell

4A, 4B, & 4C.

During the site tour, slight intermittent gas odors were observed on-site, west of the MSE wall. Mr. Schleyer stated that IESI had recently installed four vertical gas wells and installed a 14" gas header line under Cells B Phase III, Cell F and Cell D. The new gas lines collection devices were only cracked open as they had just been installed. Mr. Schleyer stated that IESI personnel will adjust the gas wells in the area to minimize the odor. No odors were observed off-site during the time of this inspection.

The radiation logs for November and December to the date of this inspection were reviewed. There were five radiation hits since this inspector's last inspection. On 11/19/12 and 11/21/12, Tc-99 was detected at a level 1 alarm. On 11/06/12, 11/17/12, and 11/20/12, I-131 was detected at a level 1 alarm. The loads were disposed of at IESI as per the Radiation Action Monitoring Plan. Log sheets were reviewed showing that the radiation monitors were detecting hits on known sources. Radiation monitor calibration was calibrated on June 20, 2012. The radiation monitor is due for calibration on June 20, 2013.

Daily tonnage reports were observed for November and December. The weight logs appear complete. The maximum daily tonnage observed in November was logged on 11/19/2012 at 2218.66 tons (1125.0 tons of MSW and 1093.71 tons of Storm Debris). The maximum daily tonnage observed in December to the date of this inspection was logged on 12/18/2012 at 1882.08 tons (1174.6 tons of MSW and 707.5 tons of Storm Debris). The overweight report for the month of November logged 13 overweight trucks. One of the trucks was over the 3% mark. The overweight report for the month of December logged 42 overweight trucks to the date of this inspection. Four of the trucks were over the 3% mark. A copy of the overweight trucks report November and December is attached to this report.

IESI ran an advertisement for public drop off at the landfill from July 1st through July 3 in the Express Times.

Insurance certificates were reviewed and are valid. The certificate expires 12/31/2012.

This concludes this inspection report.

WJH 01/02/2013

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed Sent Via 1st Class Mail Date 01/02/2013
(Signature)

Inspector *Walt P. [Signature]* Date 01/02/2013
(Signature)



martin and martin, incorporated

37 South Main Street e Suite A e Chambersburg, Pennsylvania 17201-2251

Phone: (717) 264-6759
Fax: (717) 264-7339
web: www.martinandmartininc.com

DATE: 11/21/2012 FILE NO.: 1162.1
RE: Bethlehem Landfill
8/4/12 Bench/Pipe Storm Event Report

TO
Jack Cahalan - Lower Saucon Township
Susan French - PaDEP

GENTLEMEN:

WE ARE SENDING YOU: ENCLOSED UNDER SEPARATE COVER VIA _____

THE FOLLOWING ITEMS:

PRINTS PLANS FORMS REPORT OTHER _____

NO. OF COPIES	DESCRIPTION
1 each	Storm event of 8/4/12 Bench/Pipe Report

THESE ARE TRANSMITTED AS CHECKED BELOW:

FOR YOUR INFORMATION FOR YOUR SIGNATURE FOR APPROVAL
 AS REQUESTED FOR REVIEW & COMMENT _____

REMARKS:

Herewith is our report on the August 4, 2012 bench/pipe storm event. Feel free to call us with any questions.

IN THE EVENT YOU HAVE ANY QUESTIONS CONCERNING THIS MATERIAL, PLEASE DO NOT HESITATE TO CONTACT US.

COPY(S) TO: Bethlehem Landfill
LAW

Richard M. Bodner, P.E.

MARTIN AND MARTIN, INCORPORATED

**Bethlehem Landfill
Engineering Analysis of August 4, 2012
Landfill Bench and Stormwater Pipe Overflow Event**

During an extreme high intensity storm event on August 4, 2012, a bench on an uncapped area (which is not to final grade) overtopped, which in turn overloaded channel A and an 18 inch stormwater pipe that directs stormwater from Channel A to Basin #4. The subject area is shown on the attached drawing titled "STATUS AS OF AUGUST 2012 OVERFLOW". The storm event was estimated to have produced over 1 inch of rain in 45 minutes, which is a much more intense storm than the requisite design standard, a 25-year storm event of 5.72 inches of rain over a 24-hour period.

As part of the approved Phase IV landfill design, stormwater from the South side of the landfill and the access road is conveyed via Channel A to Basin 4 (see above referenced drawing). During the construction of Cell 4-C, which ties into Cell 3-C, it was determined that the anchor trench of Cell 3-C on the South side of the landfill was at a higher elevation than anticipated, thereby creating a low point in channel A. In order to convey the stormwater to Basin 4, an 18-inch pipe was installed in the low point of Channel A and directed to Basin 4. Attached is the Channel A Culvert – Phase IV Design SEDCAD analysis, which shows that the installed 18-inch pipe was sufficiently sized for the Channel A design flow of 10 cfs. The SEDCAD analysis indicates that a minimum 15-inch pipe was required, however a larger (18-inch) pipe was installed.

As part of the approved Cell 4-F minor modification, Downdrain # 2 (DS-2) stormwater will be directed to Basin #4, per the attached drawing titled "CELL 4F MSE BERM

MODIFICATION – ENGINEERING ANALYSIS AUGUST 2012 OVERFLOW”. It should be noted that DS-2 has not yet been constructed. Said minor modification includes the design of a stormwater conveyance system to direct stormwater from Downdrain # 2 (DS-2) through an inlet (Inlet 13) to a 36-inch pipe (C-18) which empties to Channel S and into Basin# 4. Attached is the Channel A Culvert 4F Mod SEDCAD analysis from the approved minor modification, which shows that the 36-inch pipe is sufficient for the designed flows (67.4 cfs) associated with the Cell 4-F modification. Channel A remains as previously designed & installed, and is more than adequate to handle the design flows.

Following the August storm event, site personnel replaced the existing 18-inch stormwater pipe with a larger (36 inch) pipe. In addition to this replacement pipe, Inlet 13 and the 36-inch pipe (C-18) that is designed to carry the water from DS-2 and from the western reaches of Channel A to Basin # 4 will be installed during the 2013 construction season, prior to the future construction of DS-2. This 2013 construction will reduce flows in the eastern reaches of Channel A, and to the replacement 36-inch pipe.

As a result of increasing the size of the existing pipe (18” to 36”) from Channel A to Basin #4; with the soon to be installed inlet (Inlet 13) and its associated 36-inch pipe (C-18); and with Site Personnel more carefully and routinely inspecting the landfill benches, pipes and perimeter channels to insure that they are free of accumulated sediments, the stormwater overflow event of August 4, 2012 should not reoccur.

Channel A Culvert 4F Mod

CELL 4F MODIFICATION

Culvert Inputs:

Length (ft)	Slope (%)	Manning's n	Max. Headwater (ft)	Tailwater (ft)	Entrance Loss Coef. (Ke)
94.00	11.00	0.0120	6.00	0.00	0.90

Culvert Results:

Minimum pipe diameter: 1 - 36 inch pipe(s) required

Detailed Performance Curves

Design Discharge = 67.40 cfs

Maximum Headwater = 6.00 ft

(BOLD indicates design pipe size)

Headwater (ft)	Discharge (cfs) (30 in)	Discharge (cfs) (36 in)	Discharge (cfs) (42 in)
0.60	2.44	2.92	3.41
1.20	6.88	8.26	9.63
1.80	12.64	15.17	17.70
2.40	19.46	23.36	27.25
3.00	27.01	32.64	38.08
3.60	32.76	42.25	50.06
4.20	37.82	50.23	62.17
4.80	42.30	57.14	72.28
5.40	46.34	63.30	81.23
6.00	50.04	68.91	89.29
6.60	53.50	74.10	96.69
7.20	56.75	78.95	103.55
7.80	59.82	83.52	109.99
8.40	62.74	87.85	116.07
9.00	65.53	91.98	121.85



Channel A Culvert

PHASE IV DESIGN

Culvert Inputs:

Length (ft)	Slope (%)	Manning's n	Max. Headwater (ft)	Tailwater (ft)	Entrance Loss Coef. (Ke)
94.00	11.00	0.0190	4.50	0.00	0.90

Culvert Results:

Minimum pipe diameter: 1 - 15 inch pipe(s) required

Detailed Performance Curves

Design Discharge = 10.00 cfs

Maximum Headwater = 4.50 ft

(BOLD indicates design pipe size)

Headwater (ft)	Discharge (cfs) (12 in)	Discharge (cfs) (15 in)	Discharge (cfs) (18 in)
0.45	0.64	0.80	0.96
0.90	1.79	2.24	2.68
1.35	3.10	4.11	4.93
1.80	4.05	5.79	7.48
2.25	4.83	7.09	9.51
2.70	5.49	8.19	11.19
3.15	6.09	9.16	12.64
3.60	6.63	10.03	13.95
4.05	7.13	10.83	15.15
4.50	7.59	11.57	16.26
4.95	8.03	12.28	17.29
5.40	8.34	12.95	18.27
5.85	8.57	13.58	19.20
6.30	8.75	14.19	20.09
6.75	8.87	14.76	20.93





pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

November 5, 2012

Mr. Samuel Donato, District Manager
IESI Bethlehem Landfill
2335 Applebutter Road
Bethlehem, PA 18015

Re: Emergency Approval to Increase the Average and Maximum Daily Tonnage
and Operating Hours
IESI Bethlehem Landfill
ID# 100020
Lower Saucon Township, Northampton County

Dear Mr. Donato:

The Department of Environmental Protection ("Department") has reviewed IESI Bethlehem Landfill's ("IESI") email request of November 3, 2012 for approval to temporarily increase the average and maximum daily tonnage and the hours of operation at your facility as a result of the cleanup of storm related debris and residue from Hurricane Sandy. Based on the information provided, this approval will be in effect through December 31, 2012. Any extensions to this approval and term will need to be made in writing and will be on a case-by-case basis by the Department.

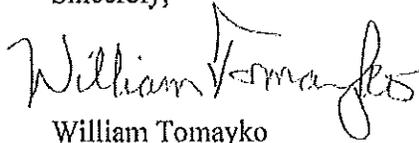
Daily Volume Increases: This emergency approval authorizes a temporary increase in IESI's average daily tonnage from 1,375 to 1,800 and the maximum daily tonnage from 1,800 tons/day to 2,300 tons/day for storm related waste only.

Operating Hours: This emergency approval authorizes IESI to operate on Sunday from 7:00 am to 4:00 pm for storm related waste only.

If you have not already done so, you should directly notify the host municipalities of this approval so that the municipalities are made aware of the possible increase in local truck traffic and operating hours. IESI shall keep operational records of storm related debris accepted. The records shall differentiate between the storm related debris and other wastes accepted at the facility as per the Department's letter dated October 29, 2012. Also, IESI is advised to keep in regular communications with the Department informing it of the scope of any operational changes and the volume of storm related waste being received.

If you have any questions feel free to contact me or John Leskosky, Operations Manager.

Sincerely,



William Tomayko
Program Manager
Waste Management Program

Cc: Lower Saucon Township

2 Public Square | Wilkes-Barre, PA 18701-1915
www.depweb.state.pa.us

570.826.2201 | Fax 570.826.5448

IESI Bethlehem LANDFILL

MONTH OF: NOVEMBER 2012

DAILY TONNAGE REPORT

4th Quarter total work days 79
 ODAT 1,375
 4th Quarter total tonnage 108,625
 Saturday Tonnage @ 500
 Monthly Budget Tonnage 37,123
 Days in Month 26
MAX 1800 PER DAY



Daily Tonnage Max (Column R) for ALL tonnage = 2300

Day Number	Date	Daily Tonnage	Month ODAT	Day of Quarter	Quarter Tonnage	Quarter ODAT	Remaining Days	Remaining Quarter Tonnage	Tons Above or (below) Budget	Daily Tonnage Sat. @ 500	Gross Average Tip Fee	Total Revenue	IESI Loads Received	STORM TONNAGE	Total Tonnage Including Food	STORM REVENUE									
1	1-Nov	1,633.5	1,633.5	28	37,993.0	1,633.5	51	70,632.0	1,633.5	1,574.6			24		1,633.51										
2	2-Nov	1,634.8	1,634.2	29	39,627.8	1,366.5	50	68,997.2	3,268.3	1,588.3			19		1,634.84										
3	3-Nov	1,520.5	1,527.2	30	40,947.7	1,366.9	49	67,673.3	4,598.2	1,553.9			21	23.21	1,543.71										
4	4-Nov	1,520.5	1,527.2	31	42,468.2	1,376.9	47	66,156.8	6,108.7	1,552.9			24	441.27	2,034.88										
5	5-Nov	1,593.6	1,540.5	32	44,061.8	1,373.7	46	64,563.2	7,702.3	1,560.3			22	734.28	2,004.69										
6	6-Nov	1,270.4	1,496.5	33	45,392.3	1,371.9	45	63,292.8	8,972.7	1,567.1			17	573.90	1,884.55										
7	7-Nov	1,310.7	1,496.5	34	46,642.9	1,358.4	44	61,079.5	10,283.4	1,599.4			27	1,007.80	1,910.38										
8	8-Nov	902.6	1,398.3	35	47,545.5	1,329.6	43	60,758.2	11,507.2	1,590.5			25	808.78	1,930.08										
9	9-Nov	321.3	1,278.6	36	47,866.8	1,318.0	42	59,889.7	12,406.7	1,610.2			15	712.07	1,611.56										
10	10-Nov	899.5	1,240.7	37	48,766.3	1,310.0	41	58,846.7	13,418.7	1,627.8			22	871.15	1,883.16										
11	11-Nov	1,012.0	1,219.9	38	49,778.3	1,302.3	40	57,835.1	14,430.3	1,648.5			24	983.08	1,994.71										
12	12-Nov	1,011.6	1,202.5	39	50,789.9	1,296.9	39	56,747.3	15,578.0	1,679.6			26	1,026.98	2,114.72										
13	13-Nov	1,087.7	1,193.7	40	51,877.7	1,282.8	38	56,031.3	16,234.0	1,710.7			26	1,114.55	1,830.54										
14	14-Nov	716.0	1,159.6	41	52,593.7	1,260.0	37	55,706.8	16,958.5	1,700.2			25	941.04	1,265.55										
15	15-Nov	324.5	1,103.9	42	52,918.2	1,248.6	36	55,181.9	17,583.5	1,719.4			20	1,093.71	2,218.66										
16	16-Nov	1,250.1	1,093.9	43	54,043.1	1,231.7	35	54,581.9	18,579.5	1,747.8			24	1,098.27	1,934.35										
17	17-Nov	896.1	1,089.3	44	54,939.2	1,207.7	34	53,685.8	19,106.0	1,792.8			24	892.03	1,380.56										
18	18-Nov	488.5	1,007.1	45	55,427.7	1,201.7	33	53,130.5	19,134.8	1,809.5			18	527.09	993.90										
19	19-Nov	66.8	1,005.9	46	55,494.5	1,184.0	32	52,146.7	20,118.6	1,895.8			17	762.65	1,746.45										
20	20-Nov	993.8	975.0	47	56,478.3	1,183.0	31	51,791.3	20,474.0	1,895.8			22	420.23	776.44										
21	21-Nov	356.4	975.0	48	56,833.8	1,183.0	30	51,621.4	21,643.9	1,824.8			20	437.94	1,607.82										
22	22-Nov	1,169.9	985.1	49	58,003.6	1,180.3	29	49,609.2	22,656.1	1,962.9			20	646.83	1,658.04										
23	23-Nov	1,012.2	985.1	50	59,015.8	1,180.3	28	48,397.7	23,668.1	1,995.6			23	713.04	1,824.49										
24	24-Nov	1,211.5	983.7	51	60,227.3	1,177.0	27	47,422.5	24,642.8	2,155.6			21	602.11	1,577.37										
25	25-Nov	975.3	993.7	52	61,202.6	1,174.8	26	46,361.2	25,904.0	2,207.7			16	587.26	1,648.49										
26	26-Nov	1,061.2	996.3	53	62,263.8	1,174.8	25																		
Month Total:																25,904.3									
Quarter Total:																80,823.37									
Average Tip Fee: \$																									
TOTAL:																694	18,559.59	44,463.92							

Oct	36,359.5
Nov	25,904.3
Dec	

Oct	
Nov	
Dec	
4th Quarter	\$

