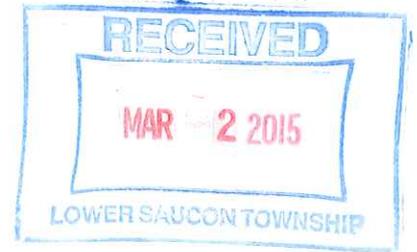




# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BETHLEHEM DISTRICT OFFICE



February 23, 2015

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

Attn: Mr. Jack Cahalan

Re: IESI PA Bethlehem Landfill  
Permit # 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 610-861-2150.

Sincerely,

*Jessica Wagoner*

Jessica Wagoner  
Solid Waste Specialist  
Waste Management Program

ROUTING

- Council
- Manager
- Asst. Mgr.
- Zoning Enclosure
- Finance
- Police
- P. Works
- P/C
- P & R
- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EMC 610.861.2070 | Fax 610-861-2072
- Other

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COMMONWEALTH OF PENNSYLVANIA  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 BUREAU OF WASTE MANAGEMENT  
 P.O. BOX 8472, HARRISBURG, PA 17105-8472

2344716 2/11/15  
 2345371 2/17/15  
 2345372 2/18/15

Inspection ID \_\_\_\_\_  
 Field Code NA

## INSPECTION REPORT – MUNICIPAL WASTE LANDFILL

Site I.D. 255983  
 Site Name IESI PA BETHLEHEM LANDFILL  
 Address 2335 APPLEBUTTER RD  
BETHLEHEM, PA 18015  
 Municipality 8924 LOWER SAUCON  
 Responsible Official SAMUEL DONATO, JR.  
 Person Interviewed AL SCHLEYER  
 Inspector Jessica Wagoner & Amy Faulch  
 eFACTS ID # PF 268729 SF 266826

Telephone # 610-317-3200  
 Operator Name IESI PA BETHLEHEM LANDFILL  
 Address 2335 APPLEBUTTER RD  
BETHLEHEM, PA 18015  
 County NORTHAMPTON  
 Title PA DISTRICT MANAGER  
 Title COMPLIANCE MANAGER  
 Title Solid Waste Specialist

Comment: Inspections were conducted on 2/11/15, 2/17/15, and 2/18/15.

Inspection Date: 2/11/2015, 2/17/15 & 2/18/15 Type: Complaint Results: No Resolved: / /  
**Violations**

Permit Expiration Date: 4/17/2023 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				
<b>GENERAL PROVISIONS</b>							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required insurance in effect (expiration date <u>12/31/2015</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
<b>DAILY OPERATIONS</b>							
<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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	02/11/15

### 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				
<b>DAILY OPERATIONS (Cont'd)</b>							
<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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				
<b>DAILY OPERATIONS (Continued)</b>							
<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
<b>COVER/SLOPES/REVEGETATION</b>							
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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
<b>WATER QUALITY PROTECTION</b>							
<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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
<b>LINER SYSTEM</b>							
<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
<b>LEACHATE TREATMENT</b>							
<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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate recirculation in accordance with regulations.	<input type="checkbox"/>	273.274(1)-(4)	78
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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
<b>WATER QUALITY MONITORING</b>							
<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
<b>RECORDKEEPING AND REPORTING</b>							
<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
				<b>MINERALS AND GAS</b>	<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
				<b>EMERGENCY PROCEDURES</b>			
<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
				<b>RECYCLING</b>			
<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
				<b>SPECIAL HANDLING AND RESIDUAL WASTES</b>			
<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 2/11/15, 2/17/15, & 2/18/15 Identification Number 100200

Company/Facility/Site Name IESI PA Bethlehem Landfill

On February 11, 2015 Jessica Wagoner conducted a complaint investigation at IESI PA Bethlehem Landfill. See narrative below.

### February 11, 2015

Jessica Wagoner ("this inspector") conducted a complaint investigation at IESI PA Bethlehem Landfill ("IESI") in response to odor complaints received by the Department on February 1, 2015 at 2022 hours and 2226 hours. This inspector entered IESI at 0915 hours. Ms. Tara Redding, Air Quality Specialist, was also present on behalf of the Department. Mr. Mike Shelden was present on behalf of IESI.

Prior to entering the landfill an odor patrol was conducted in the surrounding area from 0818- 0907 hours. A slight to moderate, persistent landfill gas and working face odor was detected along Applebutter Rd. to the west of the landfill entrance. A light, persistent working face odor was detected at the end of Skyline Dr. No other landfill related odors were detected at this time. A copy of the odor patrol log is attached.

During the site tour the flare and working face were observed. Landfill gas was being sent to the flare and Bethlehem Renewable Energy at this time. The flare was operating at 1663° F and 1426 scfm.

A very light sweet odor was detected while traveling along a perimeter road on the east side of the landfill.

The working face was located in cell 4E. Two trucks were unloading at this time. A light working face odor was detected along the North West side of the landfill near the water tower.

A light landfill gas odor was detected near PS-2 along the south west access road.

Mr. Shelden stated that there did not appear to be any particularly odorous loads that morning and operations were normal.

At the time of this inspection IESI had not conducted any odor patrols for this date. The misters were not in operation at the time of this inspection due to cold temperatures.

This concludes this complaint investigation.

On February 17 and 18, 2015 Amy Faulch conducted complaint investigations at IESI PA Bethlehem Landfill. See narratives below.

### February 17, 2015

Amy Faulch ("this inspector") responded to a complaint of odors at a residence along Johnston Ave. from IESI Bethlehem Landfill ("IESI"), received by the Department's Waste Management Program on 2/17/15 at 1102 hours. This inspector arrived in the area of IESI at 1153 hours on 2/17/15. At the time of this inspection the weather was described as light snow, 19.9°F, with winds from the north-northeast at 3.5mph.

An odor patrol was conducted in the following areas: Rt. 412, Shimersville Rd., Saucon Rd., Roberts Ave., Snyder Ave., Johnston Ave., Mixsell Ave., Adams Ave., Riverside Dr., Redington Rd., Lower Saucon Rd., Applebutter Rd.,

Ringhoffer Rd., Sherry Hill Rd. and Easton Rd. This inspector met with the complainant at their residence at 1201 hours. This inspector did not confirm an odor on their property at the time of this inspection. The complainant stated that they did not detect an odor on their property on the day of this response, but that they had detected a strong gas odor from approximately 0653-0740 hours on 2/14/15. The complainant also stated that they have been documenting garbage and gas odors on their property since last summer. During this odor patrol, a moderate, persistent sewage odor was detected along Shimersville Rd. near Applebutter Rd. and a light, intermittent sewage odor was detected along Applebutter Rd. near Shimersville Rd. Light, intermittent wood-burning odors were also detected along Easton Rd. and Sherry Hill Rd. No offsite landfill-related odors were detected at the time of this patrol. See 2/17/15 odor patrol log for details.

**February 18, 2015**

Amy Faulch ("this inspector") responded to a complaint of odors in the area of IESI Bethlehem Landfill ("IESI"). This inspector arrived in the area of IESI at 0857 hours on 2/18/15. At the time of this inspection the weather was described as haze, 7°F, with winds from the north at 3.5mph.

An odor patrol was conducted in the following areas: Shimersville Rd., Saucon Rd., Roberts Ave., Snyder Ave., Johnston Ave., Mixsell Ave., Adams Ave., Riverside Dr., Redington Rd., Lower Saucon Rd., Applebutter Rd., Ringhoffer Rd., Sherry Hill Rd. and Easton Rd. Light, intermittent sewage odors were detected along Shimersville Rd., Easton Rd. and Applebutter Rd. near the goat farm. A moderate, intermittent "burning plastic" odor was detected along Ringhoffer Rd. A light, intermittent gas and garbage odor was detected along Applebutter Rd. just west of the landfill entrance at 0931 hours. When this inspector returned to Applebutter Rd. at 0950 hours with IESI District Manager Sam Donato, the gas and garbage odor had dissipated and a light, intermittent wood burning odor was detected just west of the landfill entrance.

This inspector entered the landfill at 0945 hours. Mr. Donato provided a site tour and was interviewed on behalf of IESI. Landfill gas was being sent to the flare and to Bethlehem Renewable Energy ("BRE") at the time of this inspection. The gas flow to the flare was 1980cfm and the flare temperature was 1635°F. Mr. Donato stated that BRE was offline sometime over the weekend, but was not certain how long it was offline. As BRE was starting up on 2/17/15, Mr. Donato did detect a gas and condensate odor near the energy plant. This inspector observed the working face, which was located in Cell 4E Stage 2. There were three trucks dumping at the working face at the time of this inspection. A gas crew was also repairing a gas well just south of the working face at this time. This inspector detected light working face odors in the immediate area of the working face, however this odor did not match the character and intensity of the garbage odor detected along Applebutter Rd. during the odor patrol.

This concludes this complaint investigation.

Person Interviewed Sent via First Class Mail Date \_\_\_\_\_

(Signature)

Inspector

Jessica Wagoner  
(Signature)

Date 2/23/15

2344714 WM A

# IESI PA BETHLEHEM LANDFILL ODOR PATROL SURVEY

Investigator: J. Wagoney / T. Redding Date: 2/11/15  
Weather Conditions: 5/4 mph SSE 27° of 67% humidity

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
Skimersville Rd.	8:18	N			
Saucun Ave.	8:19	N			
Roberts Ave.	8:20	N			
Mathews Ave.	8:21	N			
Mixsell Ave.	8:24	N			
Johnston Ave.	8:22	N			
Mathews Ave.	8:22	N			
Schwab Ave.	8:22	N			
Fritz Ave.	8:23	N			
Johnston Ave.	8:23	N			
Adams Ave.	8:24	N			
Mixsell Ave.	8:24	N			
Saucun Ave.	8:27	N			
Schwab Ave.	8:30	N			
Riverside Ave.	8:30	SL			Wood burning
Saucun Ave.	8:32	O	P		Skunk
Roberts Ave.	8:33	N			
Mathews Ave.	8:34	N			



2345371

# IESI PA BETHLEHEM LANDFILL ODOR PATROL SURVEY

Investigator: Amy Fawcok Date: 2/17/15  
Weather Conditions: Light snow, 19.9°F, wind NNE @ 3.5 mph

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
Rt. 412	1153	N			eFACTS # 2345371
Shinersville	1155	M	P	S	near Sewage treatment plant
Sawcon	1159	N			
Roberts	1159	N			
Snyder	1200	N			
Johnston	1200	N			
Mixsell	1224	N			
Adams	1225	N			
Riverside	1226	N			
Beddington	1230	N			
Lower Sawcon Rd.	1235	N			
Applebutter	1238	N			
Ringhoffer	1241	N			
Easton rd	1243	SL	I	O	light wood burning odor
Ringhoffer	1245	N			
Sherry Hill	1248	SL	I	O	light wood burning odor
Applebutter	1251	SL	I	S	light Sewage odor near Shinersville Rd
Shinersville	1259	N			

Ac

2345372

IESI PA BETHLEHEM LANDFILL  
ODOR PATROL SURVEY

Investigator: Amy Faulch Date: 2/18/15  
Weather Conditions: Hazy, 70F wind N @ 3.5 mph

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
Shimersville	857	SL	I	S	light sewage odor
Sawcon	859	N			
Roberts	900	N			
Snyder	900	N			
Johston	901	N			
Mixsell	902	N			
Adams	903	N			
Riverside	904	N			
Beddington	909	N			
Lower Sawcon Rd	912	N			
Applebutter	915	N			
Binghoffer	918	M	I	O	"burning plastic" odor
Easton Rd	921	SL	I	S	very light sewage odor
Binghoffer	924	N			
Sherry Hill	926	N			
Applebutter	931	SL	I	LFG / G / S	light gas & garbage odor just west of landfill entrance light sewage odor near goat farm
ENTER LANDFILL	945				
Applebutter	950	SL	I	O	light "wood burning" odor just west of landfill entrance. Patrol w/ Sam Donato.

AC