



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BETHLEHEM DISTRICT OFFICE

*aw*

MAR 15 2012

March 13, 2012

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

S

### ROUTING

- Council
- Manager *Orig*
- Asst. Mgr. *Enclosure*
- Zoning
- Finance
- 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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COMMONWEALTH OF PENNSYLVANIA  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 BUREAU OF WASTE MANAGEMENT  
 P.O. Box 8472, Harrisburg, PA 17105-8472

Inspection ID 1790463

**INSPECTION REPORT - MUNICIPAL WASTE LANDFILL**

Permit Number 100020  
 EPA I.D. Number \_\_\_\_\_ Employer I.D. Number (EIN) \_\_\_\_\_  
 Facility Name IESI PA BETHLEHEM LDFL Operator Name IESI PA BETHLEHEM LDFL CORP  
 Address 2335 APPLEBUTTER RD Address 2335 APPLEBUTTER RD  
 SR 2012  
 City BETHLEHEM State PA Zip 18015 City BETHLEHEM State PA Zip 18015-6004  
 Municipality 8924 Lower Saucon County Northampton  
 Responsible Official SAMUEL DONATO, JR. Title PA. DISTRICT MANAGER  
 Person Interviewed Al Schleyer Title Compliance Manager  
 Telephone # \_\_\_\_\_ x \_\_\_\_\_  
 Inspector Walter F Govern Title Solid Waste Specialist  
 eFACTS ID # Client 112995 Site 255983 PF 268729 SF 266826  
 Comment \_\_\_\_\_  
 Inspection Date Start Jan 24, 2012 Inspection Time Start 0930 hrs Inspection Date End Jan 24, 2012 Inspection Time End 1600 hrs  
 Inspection Type COMPL Complaint Inspection Inspection Result NOVIO No Violations Noted

Permit Expiration Date: 04/18/2013 Days/Week Operated: 6 Max. Daily Volume: 1800 tons

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance 5 - Resolved

STATUS					REQUIREMENT	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4	5				
<b>GENERAL PROVISIONS</b>								
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required insurance in effect (expiration date _____).	<input type="checkbox"/>	271.371	1
<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Site perimeter clearly marked and grid coordinate system in use.	<input checked="" type="checkbox"/>	273.311(b)-(d)	10
<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Vehicles directed promptly to unloading area and promptly unloaded.	<input type="checkbox"/>	273.216(a), (b)	15

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<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<input type="checkbox"/>	Operator complies with Air Quality Plan approval and Air quality Operating Permit.	<input type="checkbox"/>	273.217(b)	18
<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements radiation protection action plan.	<input type="checkbox"/>	273.223(a)	25
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	<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"/>	<input type="checkbox"/>	Operator notifies Department immediately and isolates vehicle when radiation dose rates are exceeded.	<input type="checkbox"/>	273.223(e)	29
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	<input type="checkbox"/>	If intermediate cover requires revegetation, it is established within 30 days.	<input checked="" type="checkbox"/>	273.233(e)	33
<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	273.233(f)	34

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1	2	3	4	5				
<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	No waste 15 feet of inside top of the lined perimeter berm.	<input type="checkbox"/>	273.252(e)	39
<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	Edge of liner clearly marked.	<input type="checkbox"/>	273.252(g)	41
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Mine openings within site sealed as approved by Department.	<input type="checkbox"/>	273.291(b)	45
<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Daily/intermediate cover meets performance and design requirements.	<input checked="" type="checkbox"/>	273.232(b) AND 273.233(b), (c)	52
<input checked="" type="checkbox"/>	<input 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) AND 273.233(d)	53
<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	Intermediate slopes do not exceed 50%.	<input checked="" type="checkbox"/>	273.232(d)	55
<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Final slopes graded 3-15% or terraced to 33% as approved.	<input checked="" type="checkbox"/>	273.234(g)	59

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1	2	3	4	5				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minimum revegetation and successful revegetation requirements adhered to.	<input type="checkbox"/>	273.235(a)-(e) AND 273.236(a), (b)	60
<b>WATER QUALITY PROTECTION</b>								
<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	Surface water percolation minimized/prevented.	<input type="checkbox"/>	273.242(b)(1) AND 273.234(e)(4)	62
<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	273.242(a)-(c)	63
<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	273.243(a)-(g) AND 273.244	64
<b>LINER SYSTEM</b>								
<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Approved monitoring system installed and maintained.	<input type="checkbox"/>	273.281(a), (b) AND 273.283	82

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1	2	3	4	5				
<input checked="" type="checkbox"/>	<input 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 AND 273.285	83
<input checked="" type="checkbox"/>	<input 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"/>	<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"/>	<input type="checkbox"/>	Operational records maintained, available and submitted as required.	<input type="checkbox"/>	273.288 AND 273.311-273.313	86
<input checked="" type="checkbox"/>	<input 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
<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	Operator submits annual operation report with fee.	<input type="checkbox"/>	273.313	89
					<b>MINERALS AND GAS</b>			
<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>	Combustible gas levels not exceeded.	<input type="checkbox"/>	273.292(e)	91
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Approved public notice of availability of drop off center availability is provided.	<input type="checkbox"/>	273.332(d)	100
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	<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"/>	<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"/>	<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"/>	<input type="checkbox"/>	Sewage sludge co-disposal and monofill requirements followed.	<input type="checkbox"/>	273.513	105
<input type="checkbox"/>	<input 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"/>	<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



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

### Comments:

On January 24<sup>th</sup>, 2012, the Pennsylvania Department of Environmental Protection (Department) conducted a complaint investigation at IESI PA Bethlehem Landfill (IESI). Representing the Department during this inspection was Walter F. Govern III, Solid Waste Specialist (this inspector), Dean Fisher, Solid Waste Supervisor, Andy Schweitzer, Air Quality Supervisor, Jessica Wagoner, Air Quality Specialist, Ralph Policichio, Air Quality Specialist, Susan French, Waste Management Program Engineer, Sheena Ripple, Water Quality Specialist, and Bharat Bham, Hydrogeologist. Representing IESI was Al Schleyer, Compliance Manager.

#### COMPLAINT #1: LEACHATE DISCHARGE UNREPORTED NOVEMBER 2011

The discharge occurred at a leachate line clean out point west of pump station 1 which is located on the southern slope of the landfill. IESI had a similar event occur on January 12, 2012. IESI reported this event to the Department. IESI stated during the January 12<sup>th</sup> incident, that a discharge had also occurred in November but the amount of untreated leachate that escape was insignificant and the untreated leachate did not reach a stormwater basin; therefore, IESI did not report the November incident to the Department.

IESI hypothesized that there was a blockage in the leachate line between pump station one and the clean out line. IESI hired Mobile Dredge to try to remove the blockage in the leachate line. The blockage was successfully removed and a cap with gasket was installed on the clean out line and bolted in place. A photograph of the clean out line as observed by this inspector during the time of this investigation is attached to this report as Attachment B.

#### COMPLAINT #2: WHITE AND TEAL SEEPS ENTERING STORMWATER BASINS

IESI was removing silt that accumulated at the bottom of Basin 1 as part of routine maintenance. After the sediment was removed, landfill personnel noted a white precipitate seeping out of an upgradient bank on the north side of Basin 1. IESI collected a sample of the precipitate and sent it for analysis at the Penn State University Material Research Institute. Results showed that the material seeping from the north bank of Basin 1 was calcium carbonate. IESI excavated the area on the north bank of Basin 1 where the seep occurred and excavated the white material that was present. This material was identified as historic fill used by the City of Bethlehem during construction of the original landfill. The impacted area was backfilled with clay and brought to final grade with onsite fill material and topsoil.

#### COMPLAINT #3: ELEVATED pH OF STORMWATER BASIN DISCHARGE

IESI stated that the elevated pH mentioned in this part of the complaint is a result of the calcium carbonate mentioned above. IESI reported this elevation in pH in May of 2011. The basin maintenance and remediation mentioned above has resolved the elevated pH in Basin 1. During this inspection, Basin 1 and Basin 2 were discharging stormwater. Sheena Ripple of the Department's water quality program tested the discharges pH level. The Basin 1 discharge had a pH of 8.13. The Basin 2 discharge had a pH of 8.14. See Department's NPDES

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

### Comments:

Compliance Inspection Report dated January 24<sup>th</sup>, 2012, which is included in Attachment A.

#### COMPLAINT #4: IMPROPERLY INSTALLED/MAINTAINED STORMWATER BASIN RISERS LIMITING DETENTION TIME AND THEREFORE NOT MINIMIZING SEDIMENT DISCHARGE

During this inspection, Department personnel observed no sediment accumulation at the Basin 1 and Basin 2 discharge points. The risers were also observed during the time of this inspection. Upon review of the stormwater basin construction drawings detailing the basin riser pipe construction and discharge hole placement, it appeared the risers are constructed in a manner consistent with the drawings.

#### COMPLAINT #5: INTERMEDIATE AND FINAL CAPPING BEHIND SCHEDULE

IESI explained that normally, the landfill constructs about three acres of final capping. In 2011, the area received record amounts of rainfall from August through September which delayed final cap construction projects. IESI determined that reducing the acreage of final cap constructed to 1.2 acres would be most practical in order to complete the construction before winter weather could potentially interfere with the construction schedule. IESI plans on increasing the acreage capped in 2012 to account for the reduction of capping in 2011.

IESI stated that the intermediate slopes are covered with a minimum of twelve inches of soil and are routinely maintained at that depth.

#### COMPLAINT #6: SLOPES ARE TOO STEEP AND NOT PROPERLY BENCHED

No issues observed by Department Waste Program Engineer, Susan French during the time of this inspection.

In IESI's response document, attached to this inspection report as Attachment A, IESI states that the slopes and benches are constructed as designed and benches on intermediate slopes are constructed as needed to control stormwater run-off and provide access to the intermediate slopes.

According to Department regulations, slopes constructed during daily landfilling and intermediate cover activities may not exceed 50% (Pa Code 25 § 273.233(f)). It is the responsibility of IESI to maintain compliance with this regulation.

#### COMPLAINT #7: INTERMEDIATE COVER INADEQUATE TO SUPPORT VEGETATION OR PREVENT ESCAPE OF LANDFILL GAS ODORS

In April 2011, IESI proposed to manufacture its own topsoil to replace the need from buying topsoil from outside sources. This is an ongoing project as the manufactured topsoil successfully grew vegetation in the first growing season, but a determination remains to be made on whether the manufactured topsoil could maintain the growth through the winter months and promote the reemergence of vegetation during

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

### Comments:

this coming spring growing season. This project has been reviewed and approved by the Department. During the Spring of 2012, IESI plans on covering the remainder of the disposal area in the intermediate cover phase with manufactured topsoil and vegetating it.

During this inspection, the Department's Air Quality Program was represented by, Jessica Wagoner, Air Quality Specialist, Ralph Policichio, Air Quality Specialist, and Andy Schweitzer, Air Quality Supervisor. The Department Air Quality personnel conducted surface monitoring with a TVA-1000 Flame Ionization Detector. No Air Quality violations were noted during the time of this inspection.

### COMPLAINT #8: FAILURE TO PROPERLY VEGETATE SLOPES

See above (INTERMEDIATE COVER INADEQUATE TO SUPPORT VEGETATION OR PREVENT ESCAPE OF LANDFILL GAS ODORS)

### COMPLAINT #9: LANDFILL GAS ODORS LEAVING SITE TO WEST OF LANDFILL

There was an odor related incident on November 16, 2010. That incident is detailed in this inspector's inspection reports dated November 24<sup>th</sup>, 2010 and December 20<sup>th</sup>, 2010. A Notice of Violation was issued to IESI regarding the incident. To resolve the issue, IESI had installed additional landfill gas wells to more efficiently collect landfill gas along the western slope of the landfill. IESI also conducts routine odor patrols around the surrounding community to ensure that landfill odors are not traveling offsite.

During the time of this inspection, Department personnel observed slight intermittent landfill gas odors, but the odors were not determined to be violations as per the Department's Air Quality Inspection Report which is attached to this inspection report as part of Attachment A.

### COMPLAINT #10: TRUCK WASH WATER NOT DISCHARGED TO SANITARY SEWER AND ALLOWED TO ENTER STORMWATER CONVEYANCES

IESI stated that the truck wash system is a self-contained recirculating wash water system. The when the water level gets too high as a result of stormwater infiltration the truck wash water pit is pumped to the sanitary sewer water line that pipes the water to the Bethlehem Waste Water Treatment Plant. During this inspection, the level of the wash water in the pit was high. The stationary pump adjacent the wash water pit that is used to regulate the water level was not in service. IESI was using a portable submersible pump to regulate the level of the pit. It was advised that the stationary pump be fixed and brought back into service.

In the response document IESI submitted to the Department on March 7<sup>th</sup>, 2012, IESI stated that the stationary pump has been replaced and the truck wash water level in the pit is maintained by a float system with a gravity drain in place as a back-up.

### COMPLAINT #11: NO GRID SYSTEM FOR TRACKING WASTE DISPOSAL LOCATION

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Comments:

IESI has a grid system in place as part of their standard operating procedures. Martin & Martin Inc., the engineering firm that designs cell construction at IESI and submits the cell certification to the Department also provides IESI with copies of the current disposal cell that includes the corresponding designated grid coordinates. A copy of the grid system over working face is attached to the response document attached to this inspection report as Attachment A.

LIST OF ATTACHMENTS TO THIS INSPECTION REPORT

Attachment A - IESI's Response Document Received by the Department on March 7th, 2012, Photographs provided by Complainant and Outline of Allegations, Attendance list of the individuals present for this complaint inspection, Sample Results of white discharge from Laboratory at Penn State University Material Research Institute, NPDES Compliance Inspection Report dated 01/24/2012 drafted by Sheena Ripple, Department Water Quality Specialist, NPDES Compliance Inspection Report dated 01/12/2012 drafted by Steve Pletchan, Air Quality Inspection Report dated 01/24/2012 drafted by Ralph Policichio, and a Sample Disposal Grid Sheet showing grid system in place at IESI.

Attachment B - Photographs taken by this inspector during the time of this inspection.

This concludes this inspection report as no waste management violations were observed during the time of this inspection.

*[Handwritten signature]*  
*03/13/2012*

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 1<sup>st</sup> Class Mail Date 03/13/2012  
(Signature)

Inspector *[Handwritten Signature]* Date 03/13/2012  
(Signature)



March 5, 2012

Pa Department of Environmental Protection  
Dean Fisher, Supervisor  
Bethlehem District Office  
Bethlehem, PA 18015

RECEIVED

MAR 07 2012

BETHLEHEM DISTRICT OFFICE  
PA DEP

Re: Response to PADEP Complaint ID# 285822

Dear Mr. Fisher:

IESI Bethlehem Landfill is providing the following response to the issues raised in the PADEP complaint discussed at Bethlehem Landfill during the site inspection conducted on January 24, 2012.

DEP Complaint ID# 285822-IESI PA Bethlehem Landfill  
January 24, 2012

#1. Leachate discharge unreported November 2011 (see attached images)

This incident occurred on the morning of November 23, 2011, after an overnight rain event. The incident was reported as a release from the leachate cleanout pipe west of pump house #1 by phone to Sam Donato, Landfill Manager and Allen Schleyer, Compliance Manager prior to their arrival at the landfill. The end cap was reattached thereby stopping the flow. The attached images of the release were not provided to either the compliance manager or landfill manager, nor were there any discussion of photos being taken. This occurrence was not reported to the Department because there was no evidence indicating that the water/leachate reached Stormwater Basin #4. We did not believe it met the criteria of an environmental release into the waters of the Commonwealth or pose a hazard or threat to the public. The leachate/stormwater did enter the stormwater channel directly under the end of the cleanout pipe, but as shown in the photo attached, the flow path did not traverse past the extent of the photo. The end cap was sealed and the employee responsible for making the repair and preventing a reoccurrence was instructed to fasten the end cap with screws to prevent the cap from coming off under pressure. The preventive repair to fasten the cap with screws was not completed which resulted in a recurrence of leachate/stormwater discharging from the cleanout again on January 12, 2012. During that incident, I (Compliance Manager) did observe the discharge from the cleanout and also observed the flow into Basin #4. This incident was reported to the Department by phone and also during a scheduled routine meeting with S. French, PADEP Engineer on January 12, 2012.



Attachment A  
1 of 24

Additional PADEP personnel arrived on site to conduct an inspection of the incident and asked if this had ever previously occurred. I stated that it did occur on the day before Thanksgiving but it was not a significant release nor did it contact the stormwater Basin #4, or waters of the Commonwealth and did not report the release to the Department. Results of the January 12, 2012 inspection have been addressed in other reports.

In the future, as discussed with PADEP Water Quality Specialist, Sheena Ripple, any leachate release of this nature will be reported to the Department even if it is a maintenance issue.

#2. White & teal colored seeps entering Stormwater Basins.

#3 Elevated pH of Stormwater Basin Discharge.

These two complaints are interconnected, both relating to a maintenance program of Basin #1. In May 2011 the elevated pH of the stormwater discharge was reported to the Department. IESI began an investigation to the cause of the elevated pH in the stormwater. The accumulated silt in the bottom of the basin was cleaned out as routine maintenance. Later there was a white precipitate that seeped out of the upgradient bank on the north side of Basin #1. This precipitate material was collected and sent to the Penn State University Material Research Institute for an X-ray diffraction analysis (see attached). The results confirmed that the precipitate was a calcium carbonate material and was the likely cause of the elevated pH of the stormwater in the Basin. The impacted area on the north side of the basin was excavated and some areas were identified as historic fill material that contained this white precipitate used by the City of Bethlehem during construction of the up-gradient slope on the north side of the basin. As much soil as practical was removed. The excavated area was then covered with compacted clay and brought to final grade with onsite fill material and topsoil. This Basin maintenance has remediated the elevated pH.

#4 Improperly installed/maintained stormwater basin risers limiting detention time and therefore not minimizing sediment discharge.

During the January 24, 2012 inspection by PADEP personnel, Basin risers and stormwater discharge outlets were inspected for evidence of sediment build-up in the outlets and also analyzed for pH. All discharges observed showed no indication of sediment release, short-circuiting or elevated pH. In addition to the observations and analysis of the discharge water, the stormwater basin construction drawings detailing the Basin riser pipe materials and discharge hole placement were reviewed. Basin risers were consistent with construction criteria and determined to be in compliance.

#5 Intermediate and Final capping behind schedule.

Each year Bethlehem Landfill constructs approximately 3 acres of final capping that includes synthetic liner, cover soil and topsoil vegetated for stabilization. In 2011, there was a record amount of rainfall that occurred from late August through September, which

delayed the cap construction schedule considerably. As late fall/winter approached it was determined that best practical construction effort would be made by reducing the acreage to 1.2 acres in order to ensure that the cap would be completed before winter weather could potentially interfere with the construction and liner placement. This reduced acreage will be accounted for with a more aggressive capping schedule for 2012. Intermediate cover is maintained to a minimum of 12 inches.

#6. Slopes are too steep and not properly benched.

Slopes and benches are constructed as designed and benches on intermediate slopes are constructed as needed to control stormwater run-off and provide access to the intermediate slopes.

#7. Failure to properly vegetate slopes.

In April 2011, IESI proposed to develop a manufactured topsoil (letter dated April 18, 2011) to replace the use of topsoil from outside sources. The manufactured topsoil was placed on the top of the slopes on the west side of the landfill as a demonstration project. This manufactured soil successfully supported vegetation throughout the summer and fall growing season. This evaluation will continue into the spring 2012 during the early growing season to determine if the vegetation can "winter over" in the manufactured topsoil. During the spring of 2012, the remainder of the disposal area in the intermediate cover phase will be recovered with the manufactured topsoil and vegetated.

#8 Landfill Gas odors Leaving Site To West Of Landfill.

An incident of off-site odors did occur on November 16, 2010 and IESI Bethlehem Landfill was investigated by PADEP personnel and cited with a Notice of Violation for the incident. Investigation into the cause of the off-site odor, determined it was from the interface of a new cell constructed and the older disposal area tie-in. IESI has modified its' construction procedures for this type of connecting cell tie-in and has prevented a recurrence. In addition, IESI has an aggressive lfg well construction and placement program to counter the growing landfill area and to control odor emissions. One particular procedure is to place a horizontal collector as close as practical to the toe of the slope of the connecting older disposal cell and the new cell construction tie-in. One such horizontal collector is located on the west slope of the disposal area. IESI also installed thirteen vertical landfill gas wells in the Cell 4-C and D areas which are located west and south of the general disposal area. Routine odor patrols are conducted to monitor for odors. During the January 24, 2012 DEP site inspection; odors were monitored using gas detectors and odor detection by smell. In addition wind speed and direction were noted. Some intermittent, slight odors were detected by PADEP personnel but were determined not be malodorous or having the potential to be detected off-site.

#9 Truck Wash Water Not Discharged To Sanitary Sewer And Allowed To Enter Stormwater Conveyances.

The landfill truck wash system is a self contained recirculating wash water system. The truck wash water is pumped into a discharge pipe system located internally in the truck wash reservoir tank that is directly connected to the Bethlehem WWTP sanitary sewer system. At the time of the January 24, 2012 inspection the discharge pump was out of service but the water level was maintained via gravity drain into the sanitary sewer system. The pump has since been replaced and the truck wash water level is maintained by a float system with the gravity drain as a back-up.

#10 No Grid System For Tracking Waste Disposal Location.

Providing a grid location sheet to the operators at the working face and scalehouse is standard procedure for every new disposal cell constructed and approved for use by the Department. Martin & Martin Inc., the engineering firm who designs the cells and submits the cell certification to the Department also provides IESI with copies of the current disposal cell that includes the corresponding designated grid coordinates. This sheet is typically laminated for use in the field by the lead operators at the working face (see attached grid sheet).

If you have any further questions please call either Sam Donato or me at 610-317-3200.

Sincerely



Allen Schleyer  
Compliance Manager

Enclosures As stated

Cc: W. Tomayko, PADEP NERO  
S. French, PADEP Engineer  
Jack Cahalan, Lower Saucon Township  
Sam Donato, IESI Corporation

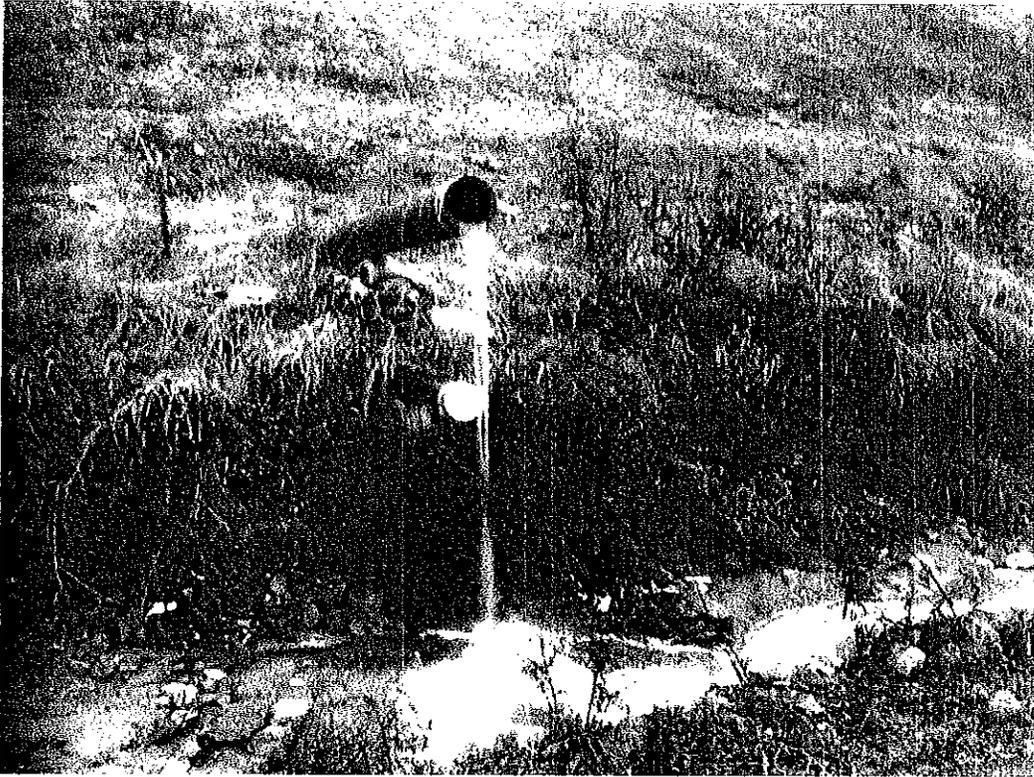
Attachment A  
4 of 24

# ATTACHMENT

PADEP Complaint ID# 285822

**DEP Complaint ID# 285822 – IESI PA Bethlehem Landfill**  
January 24, 2012

- Leachate Discharge Unreported November 2011 (See Attached Images)
- White & Teal Colored Seeps Entering Stormwater Basins
- Elevated pH Of Stormwater Basin Discharges
- Improperly Installed/Maintained Stormwater Basin Risers Limiting Detention Time And Therefore Not Minimizing Sediment Discharge
- Intermediate & Final Capping Behind Schedule
- Slopes Are Too Steep And Not Properly Benched
- Intermediate Cover Inadequate To Support Vegetation Or Prevent Escape Of Landfill Gas/Odors
- Failure To Properly Vegetate Slopes
- Landfill Gas Odors Leaving Site To West Of Landfill
- Truck Wash Water Not Discharged To Sanitary Sewer And Allowed To Enter Stormwater Conveyances
- No Grid System For Tracking Waste Disposal Location



1/24/12 IEST

Don J. Fisher 610-861-2063 Solid Waste Specialist  
Walter F. Govern 610-861-2136 Solid Waste Specialist  
Jessica Wagoner 610-861-2150 Air Quality Specialist  
Bharat Pham 610-861-2156 Hydrogeologist/BDO  
Al Schleyer 484-357-3135 IEST  
Andy Schweitzer 610-861-2143 DEP-AQ  
Susan French 570-826-2064 DEP-WM  
Ralph Policichio 610-861-2024 DEP-AQ  
Sheena Ripple 610-861-2153 DEP-WQ

Attachment A

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# ATTACHMENT

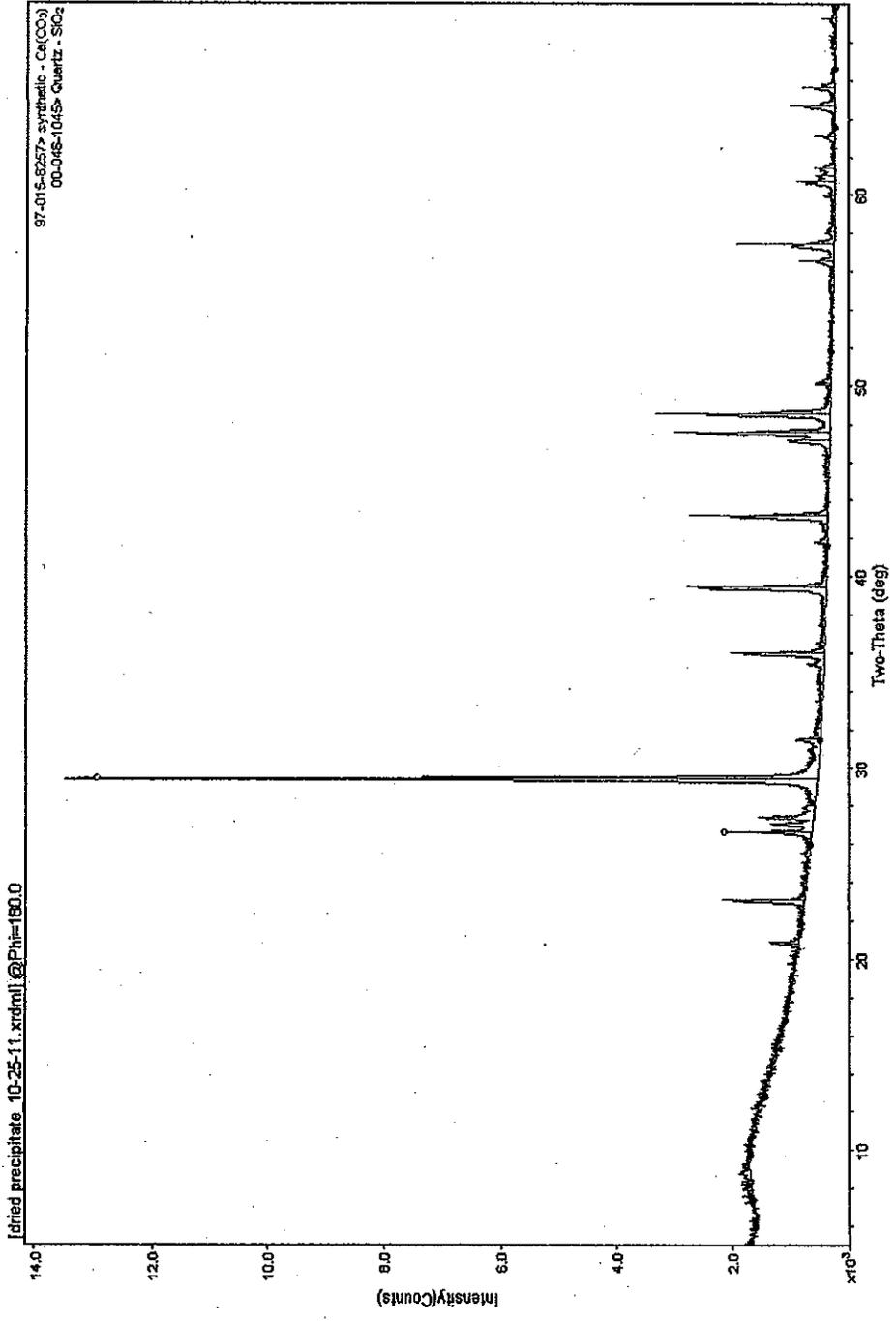
Penn State University

Material Research Institute

XRD Analysis

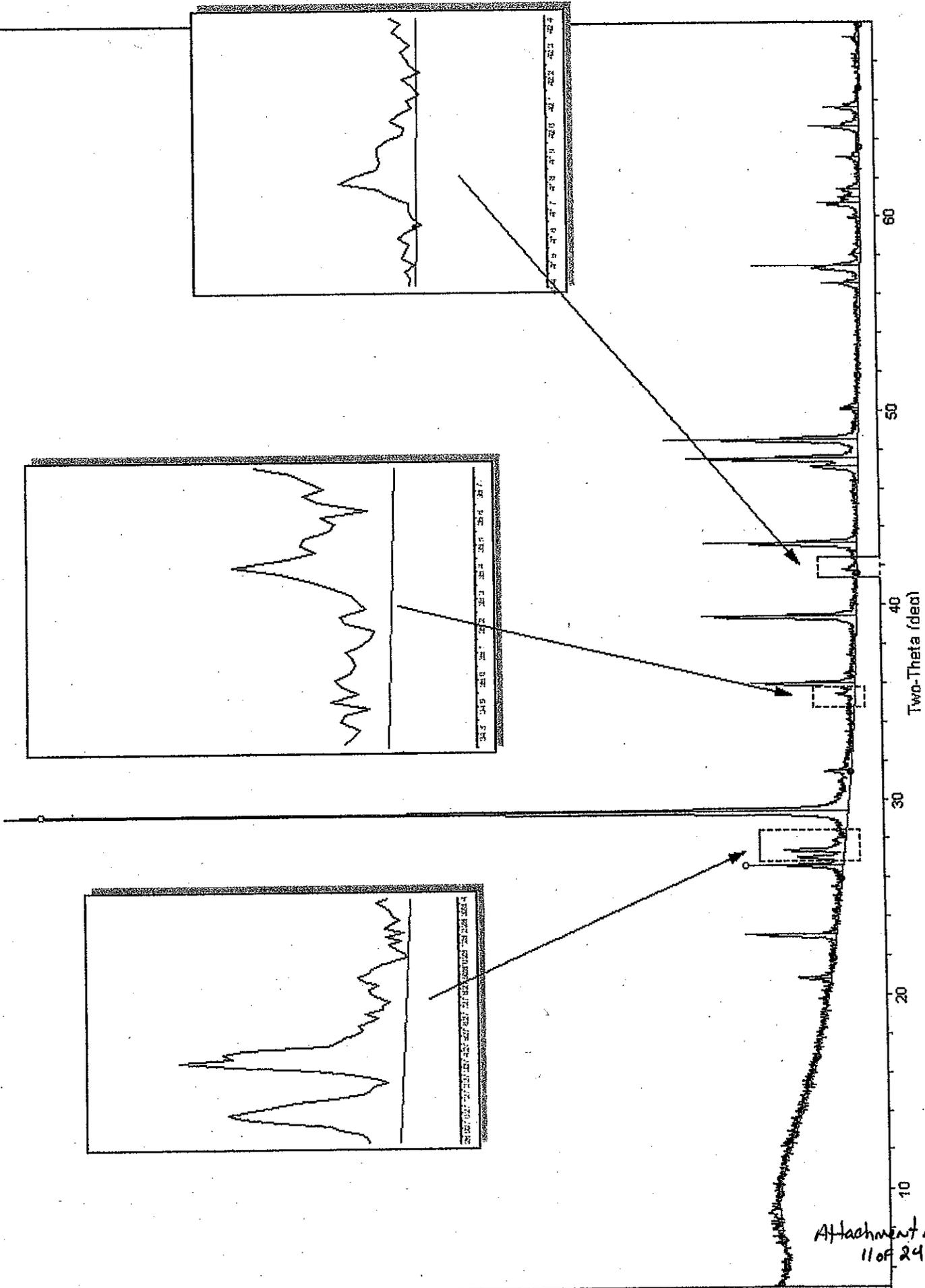
Deg. 2-theta	Intensity
5.01313	1608
5.089891	1679
5.065651	1692
5.091912	1781
5.118173	1680
5.144433	1750
5.170693	1703
5.196954	1695
5.223215	1708
5.249475	1674
5.275736	1647
5.301996	1684
5.328257	1640
5.354517	1667
5.380778	1678
5.407039	1627
5.433299	1612
5.45956	1626
5.48582	1613
5.512081	1630
5.538342	1571
5.564602	1605
5.590863	1625
5.617123	1666
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5.774686	1599
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5.853468	1631
5.879729	1560
5.905989	1684
5.93225	1644
5.95851	1577
5.984771	1556
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6.037292	1602
6.063553	1619
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6.116074	1605
6.142334	1624
6.168595	1601
6.194856	1579
6.221116	1561
6.247377	1623
6.273637	1645
6.299898	1682
6.326159	1614
6.352419	1527

Dried material appears to be primarily calcite (calcium carbonate). A small amount of quartz is also present. Additional compound(s) that were unidentifiable are present and indicated by the zoomed boxes in the pattern at right. (Scroll to right to see additional view.) Additional testing (i.e., a chemical analysis to determine elemental composition) is required if it is necessary to determine the nature of these unidentified peaks. The unidentified peaks likely correspond to a small weight percent of unknown compounds.

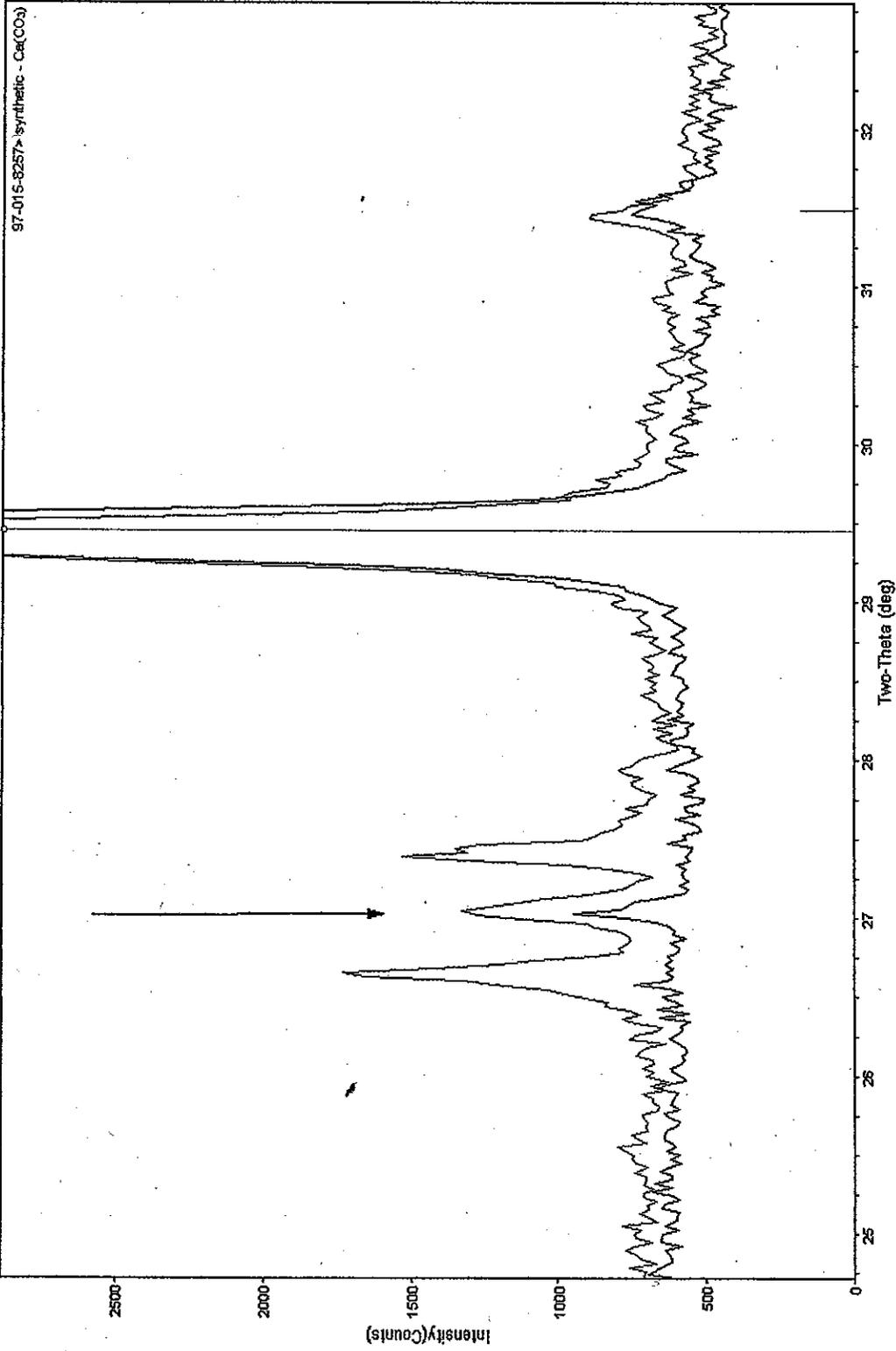


Attachment A  
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97-015-8257> synthetic - Ca(CO<sub>3</sub>)  
00-046-1045> Quartz - SiO<sub>2</sub>



[dried precipitate\_10-25-11.xrdm] @Phi=180.0  
[creamy white substance\_10-25-11.xrdm] @Phi=180.0



[WONDERLING\me10]\M\Excel\Industry\EST\WRD> Tuesday, October 26, 2011 12:03p (MJD\JADB)

Penn State

Attachment A  
12.05.24

**ATTACHMENT**

**PADEP  
Site Inspection Reports**

**Water Quality Program**

**Air Quality Program**



**NPDES COMPLIANCE INSPECTION REPORT**  
**Section A: National Data System Coding**

NPDES		Mo. / Day / Yr.		Inspection Type		Inspection ID No.	
PAR502205		012412		COMPL			
Primary Facility Name IESI - Bethlehem Landfill				Municipal Authority or Operating Authority			
Location of Facility Applebutter Rd, Bethlehem						Permit Expiration Date 11/16/15	
Municipality Lower Saucon			County Northampton		Permit Renewal Application Due		
Primary Facility Kind <input type="checkbox"/> Sewage <input type="checkbox"/> Industrial Waste <input checked="" type="checkbox"/> Stormwater <input type="checkbox"/> Other							
Responsible Person Sam Donato				Operator in Responsible Charge Allen Schleyer			
Title PA District Manager				Certificate Number		Class & Subclasses	Client ID Number
Address 2335 Applebutter Rd Bethlehem PA				Address Compliance Manager			
Business Phone Number		FAX Number		Business Phone Number 6103173200		Cell Phone Number	
E-mail Address				E-mail Address			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Samples have been collected by the Department, violations may be revealed upon receipt of the analysis.							
Grab samples not collected. Field measurements were collected from Basin 1 + 2.							
Name of Person Interviewed Allen Schleyer			Date	Name of Inspector Sheena Ripple			Date 1/24/12
Signature of Person Interviewed Allen Schleyer			Phone Number 6103173200	Signature of Inspector Sheena Ripple			Phone Number 6108612458
Title Compliance Manager				Title WQS			
This document is official notification that a representative of the Department of Environmental Protection inspected the above facility or site. The findings of this inspection are shown above and on any attached pages.							
Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records. Notification will be forthcoming, if such violations are noted.							



## NPDES COMPLIANCE INSPECTION REPORT

### Additional Comments

The Department received multiple complaints about LESI landfill.

The following DEP employees went to the landfill to investigate the complaints:

Waste Management - Dean Fisher,  
Wally Govern  
Bhorat Bham

Air Quality - Andy Schweitzer  
Jessica Wagoner  
Ralph Policichio

Environmental Engineer - Susan French

Water Quality Complaints:

1) Leachate discharge unreported  
November 2011

In November 2011, a cap from a cleanout pipe disconnected and leachate was discharged. The discharge was unreported because leachate did not make it to the stormwater basin.

On 1/12/12, Steve Pletcher (WQS) investigated a similar leachate

Page 2 of 5

Date: 1/24/12

Permit No.: PA R502205

White - Regional Office

Yellow - Responsible Person

Pink - Inspector

Attachment A  
15 of 24



## NPDES COMPLIANCE INSPECTION REPORT

### Additional Comments

discharge. The cap came off the clean out pipe west of pump station 2 + discharged leachate. The leachate did make it to stormwater basin 4. Steve asked IESI to sample the discharge from Basin 4. IESI pumped Basin 4 out and sent the water to the Bethlehem STP.

### 2) White + Teal Colored Seeps entering Stormwater Basins

Calcium carbonate in the soil of the stormwater basins caused the white + teal color seeps. These seeps were removed and the area was capped with clay.

### 3) Improperly Installed / Maintained Stormwater Basin Risers limiting Detention time and therefore not minimizing Sediment discharge

The stormwater basin risers were installed and are maintained properly.

### 4) Truck wash water not discharged to the sanitary sewer + allowed to enter stormwater conveyances



## NPDES COMPLIANCE INSPECTION REPORT

### Additional Comments

During the inspection on 1/24/12, the water level in the truck wash was very high. The pump station for the truck wash is currently not operational. IESI is using a portable submersible pump to discharge truck wash water to the sanitary sewer.

By the truck wash there is a stormwater drain. I asked IESI to pump down the truck wash water to prevent a possible overflow.

The cap on the cleanout pipe that discharged leachate was replaced. The cap is bolted & sealed. It should not come off again.

During the inspection Basins 1+2 were discharging. I tested the pH of both discharges.

IESI is going to complete a report for the Department addressing the complaints.

Page 4 of 5

Date: 1/24/12

Permit No.: PA R 502205

White - Regional Office

Yellow - Responsible Person

Pink - Inspector

Attachment A

17 of 24



# NPDES COMPLIANCE INSPECTION REPORT

## Effluent/Receiving Water Evaluation

Stream Name Unnamed Trib to E. Branch Salcon Creek

Upstream Conditions/Location:

Field Measurements

Flow	_____	c.f.s.
pH	_____	s.u.
Conductivity	_____	umhos/cm
Dissolved Oxygen	_____	mg/L
Total/Free Chlorine Residual	_____	mg/L
Temperature	_____	°C
DEP Collector Number	_____	

Latitude: \_\_\_\_\_

Longitude: \_\_\_\_\_

Location: \_\_\_\_\_

Outfall Number

Basin 7

Field Measurements

Flow	_____	mgd
pH	<u>8.13</u>	s.u.
Conductivity	_____	umhos/cm
Dissolved Oxygen	_____	mg/L
Total/Free Chlorine Residual	_____	mg/L
Temperature	_____	°C
DEP Collector Number	_____	

Location: \_\_\_\_\_

Downstream Conditions/Location:

Field Measurements

Flow	_____	c.f.s.
pH	_____	s.u.
Conductivity	_____	umhos/cm
Dissolved Oxygen	_____	mg/L
Total/Free Chlorine Residual	_____	mg/L
Temperature	_____	°C
DEP Collector Number	_____	

Latitude: \_\_\_\_\_

Longitude: \_\_\_\_\_

Location: \_\_\_\_\_

Outfall Number

Basin 2

Field Measurements

Flow	_____	mgd
pH	<u>8.14</u>	s.u.
Conductivity	_____	umhos/cm
Dissolved Oxygen	_____	mg/L
Total/Free Chlorine Residual	_____	mg/L
Temperature	_____	°C
DEP Collector Number	_____	

Location: \_\_\_\_\_

Downstream Conditions/Location:

Field Measurements

Flow	_____	c.f.s.
pH	_____	s.u.
Dissolved Oxygen	_____	mg/L
Conductivity	_____	umhos/cm
Total/Free Chlorine Residual	_____	mg/L
Temperature	_____	°C
DEP Collector Number	_____	

Latitude: \_\_\_\_\_

Longitude: \_\_\_\_\_

Location: \_\_\_\_\_

Page 5 of 5

Date: 1/24/12

Permit No.: PAR 502205

White - Regional Office

Yellow - Responsible Person

Pink - Inspector

Attachment A  
18 of 24



**NPDES COMPLIANCE INSPECTION REPORT**  
**Section A: National Data System Coding**

NPDES							Mo. / Day / Yr.						Inspection Type					Inspection ID No.											
P	A	S	5	0	2	2	0	5	0	1	1	2	1	2	I	N	C	D	T										
Primary Facility Name <b>IESI PA – Bethlehem Landfill</b>												Municipal Authority or Operating Authority <b>NA</b>																	
Location of Facility <b>Applebutter Road, Bethlehem</b>												Permit Expiration Date <b>11/16/2015</b>																	
Municipality <b>Lower Saucon Twp</b>						County <b>Northampton</b>						Permit Renewal Application Due <b>No Later Than 180 days before Expiration</b>																	
Primary Facility Kind <input type="checkbox"/> Sewage <input type="checkbox"/> Industrial Waste <input checked="" type="checkbox"/> Stormwater <input type="checkbox"/> Other																													
Responsible Person <b>Sam Donato</b>												Operator in Responsible Charge <b>Allen Schleyer – Compliance Manager</b>																	
Title: <b>PA District Manager</b>												Certificate Number <b>N/A</b>				Class & Subclasses <b>N/A</b>				Client ID Number <b>N/A</b>									
Address: <b>2335 Apple Butter Rd</b>												Address:																	
<b>Bethlehem, PA</b>																													
Business Phone Number						FAX Number						Business Phone Number <b>610-317-3200</b>						Cell Phone Number											
E-mail Address												E-mail Address <b>aschleyer@iesi.com</b>																	
<b>VIOLATIONS:</b> <input type="checkbox"/> Yes <input type="checkbox"/> Samples have been collected by the Department, violations may be revealed upon receipt of the analysis.																													
Met with Allen Schleyer in response to notification from IESI regarding a discharge or untreated leachate to a stormwater swale leading to stormwater basin No 4, discharging to the East Branch of the Saucon Creek.  Allen gave me a tour of the facility and explained what occurred. Allen informed me that just after 0800 today, it was noticed that the first clean out pipe west of the pump station 1 was discharging leachate. Upon closer inspection, Allen noticed that the lid had become dislodged from the pipe as it was not screwed on to the clean out. He checked the sump from the leachate system and said that it was reading normal levels. Allen believes that there must be a blockage in the line, causing leachate to backup and discharge out of the clean-out due to elevation or pressure.																													
Name of Person Interviewed <i>Allen Schleyer</i>												Date <i>1/12/2012</i>						Name of Inspector <b>Stephen M. Pletchan</b>						Date <i>1/12/2012</i>					
Signature of Person Interviewed <i>Allen Schleyer</i>												Phone Number <i>610-317-3200</i>						Signature of Inspector <i>Step - Pk</i>						Phone Number (Office) 610-861-2078 (Cell) 570-592-2678					
Title <i>Compliance Manager</i>												Title <b>Water Quality Specialist</b>																	
This document is official notification that a representative of the Department of Environmental Protection inspected the above facility or site. The findings of this inspection are shown above and on any attached pages. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records. Notification will be forthcoming, if such violations are noted.																													

White – Regional Office

Yellow – Responsible Person

Pink - Inspector

*Attachment A*  
*19 of 24*



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WATER STANDARDS AND FACILITY REGULATION

NPDES COMPLIANCE INSPECTION REPORT

Additional Comments

- Continued -

Allen said that they replaced the clean out to stop or slow the discharge and had the cap fastened with screws. Unfortunately, this only slowed the rate of discharge. At the time of my inspection, I estimated the flow to be about +/- 1 gallon per minute. The leachate was being conveyed to Storm Water Basin No 4. We did confirm that basin No 4 was discharging at an estimated rate of about +/-20 gallons per minute. Allen explained that he has contacted Mobile Dredge to jet the clean-out in an attempt to remove the blockage and return the flow to the leachate conveyance lines. He is also going to have basin 4 pumped out by Godwin Pumps. The water is going to be sent to Bethlehem STP for treatment. Leachate is not treated onsite but is piped into the City of Bethlehem Sewer Lines for treatment. Allen has contacted his Environmental sampling contractor and is having them sample the discharge from Basin 4 as soon as possible for the normal stormwater parameters listed in their NPDES Stormwater permit under Appendix C.

Allen is trying tapes and seals to try and further stop the flow today. He said that once the discharge stops, they are going to weld on a flange so they can bolt and seal the fitting shut. Allen said this is the second time that this cleanout has discharged. He said that around Thanksgiving, they discovered a small trickle coming from the same cleanout that was discharging today. He said discharge was right after a rain event as well. Allen said that he did not notify DEP of this occurrence because the volume was insignificant. He feels that the partial causes of these discharges are the drainage area. The new cell is uncapped which is resulting in higher than usual flows in that line and a blockage may exist between the cleanout and the pump station.

I requested that Allen follow-up when the repairs are complete. The report should include what steps IESI has taken to resolve the blockage in the lines and what steps they have taken to eliminate any future discharges from the leachate conveyance clean-out. Also, please include the sample results from ERG once testing is complete.

*Al Schley*

White - Regional Office

Yellow - Responsible Person

Pink - Inspector

Attachment A  
20 of 24



# INSPECTION REPORT

Commonwealth of Pennsylvania  
Department of Environmental Protection  
Air Quality Program

Date(s) of Inspection: <b>1-24-12</b>	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): <b>48-00027</b>	Expiration Date: <b>Permit shield</b>	Case #: <b>N/A</b>	PF ID #: <b>549728</b>
--	--	---	---------------------------------	--	-----------------------	---------------------------

Company Name: <b>IESI PA Bethlehem Landfill Corporation</b>	Municipality: <b>Lower Saucon Township</b>	County: <b>Northampton</b>
--	---	-------------------------------

Plant Name: <b>Bethlehem Landfill</b>	Physical Location: <b>2335 Applebutter Road</b>	Federal ID - Plant Code #: <b>22-3575227-1</b>
--	--	---

Responsible Official: <b>Sam Donato</b>	Mailing Address: <b>IESI PA Bethlehem Landfill Corp.</b>
--	---

Title: <b>Landfill Manager</b>	<b>2335 Applebutter Road</b>
-----------------------------------	------------------------------

Phone #(s): <b>610-317-3200</b>	<b>Bethlehem, PA 18015-6004</b>
------------------------------------	---------------------------------

### Mark (X) All Inspection Types That Apply To This Inspection:

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Full Compliance Evaluation (FCE)  | <input type="checkbox"/> Plan Approval Inspection                | <input type="checkbox"/> File Review (FR)            |
| <input type="checkbox"/> Operating Permit Inspection (PI)  | <input type="checkbox"/> Initial Permit Inspection (IPI)         | <input type="checkbox"/> Complaint Inspection (CI)   |
| <input checked="" type="checkbox"/> Routine/Partial (RTPT) | <input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____) | <input type="checkbox"/> Sample Collection (SC)      |
| <input type="checkbox"/> Minor Source(s) Inspection (RFD)  | <input type="checkbox"/> Stack Test Observation                  | <input type="checkbox"/> Multi-Media Inspection (MM) |
| <input type="checkbox"/> Other:                            | <input type="checkbox"/> Announced                               |  |

Annual Compliance Certification Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:
AIMS Report Received: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received:

### Mark (X) All Activities That Apply:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> File Review                            | <input checked="" type="checkbox"/> Pre-Inspection Briefing | <input checked="" type="checkbox"/> Exit Interview/Briefing |
| <input checked="" type="checkbox"/> Pre-Inspection Observations | <input type="checkbox"/> Check For New/Unreported Sources   | <input type="checkbox"/> Sample(s) Collected                |
| <input type="checkbox"/> Visible Emissions Observations         | <input type="checkbox"/> Verify Operation of CEMS           | <input type="checkbox"/> Other                              |

Comments/Recommendations: Enforcement since last FCE  Yes  No (If yes, attach summary)

**Today Jessica Wagoner and I conducted surface monitoring with a TVA-1000 flame ionization detector at IESI PA Bethlehem Landfill Corporation. We were accompanied by Allen Schleyer of IESI.**

**The following wells were checked with the FID: EW 4-20, EW 4-26, EW 4-5A, EW 4-24, 414, 4-4A, 4-1A, EW 4-17, HW 14, HW 44, EW 4-30, EW 4-127, EW 4-28, HW 42A, EW 4-30, HW 4-13, EW-10-11, HW 4-11, HW 4-12. A seep & the west end valve were also checked.**

**The following Readings above 500 ppm on the FID were**

Compliance Status:  In  Out  Pending  Awaiting Co. Report Needs a Follow-Up Inspection?  Yes  No

Company Representative: <b>Allen Schleyer</b>	Title: <b>Compliance Mgr</b>	Signature: <i>Allen Schleyer</i>	Date: <b>1-24-12</b>
--	---------------------------------	-------------------------------------	-------------------------

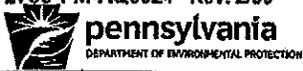
DEP Representative: <b>Ralph Policichio</b>	Title: <b>Environmental Trainer</b>	Signature: <i>Ralph Policichio</i>	Date/Time: <b>1-24-12</b>
--	--	---------------------------------------	------------------------------

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

Page 1 of 2 eFacts Inspection ID#: 2036548 Date: 1/25/2012 Reviewed By: (Signature) 1/26/12

White - Regional Office  Yellow - Site  Pink - District Office

**Attachment A**  
**21 of 24**



# INSPECTION REPORT

Continued

Commonwealth of Pennsylvania  
Department of Environmental Protection  
Air Quality Program

measured at the following west end valve (2200 ppm)  
EW-4-26 (2250 ppm) } EW-4-5A (1700 ppm)  
4-4A (6000 ppm) } 4-1A (5000 ppm)  
EW 4-17 (2600 ppm) } HW-44 (1200 ppm)  
HW-42A (600 ppm) } HW 4-12 (2000 ppm)

These areas were immediately marked.  
IEST said these areas corrective action will be  
completed on these areas in the next few days. After  
this SCS Field Services will remonitor these areas.  
No Air Quality Violations noted at this time.

Company - plant name:  
IES IMA Bethlehem

Initials of representative interviewed:  
J

Date:  
1-24-12

Page 2 of 2

Reviewed By: (AFD) 1/25/12

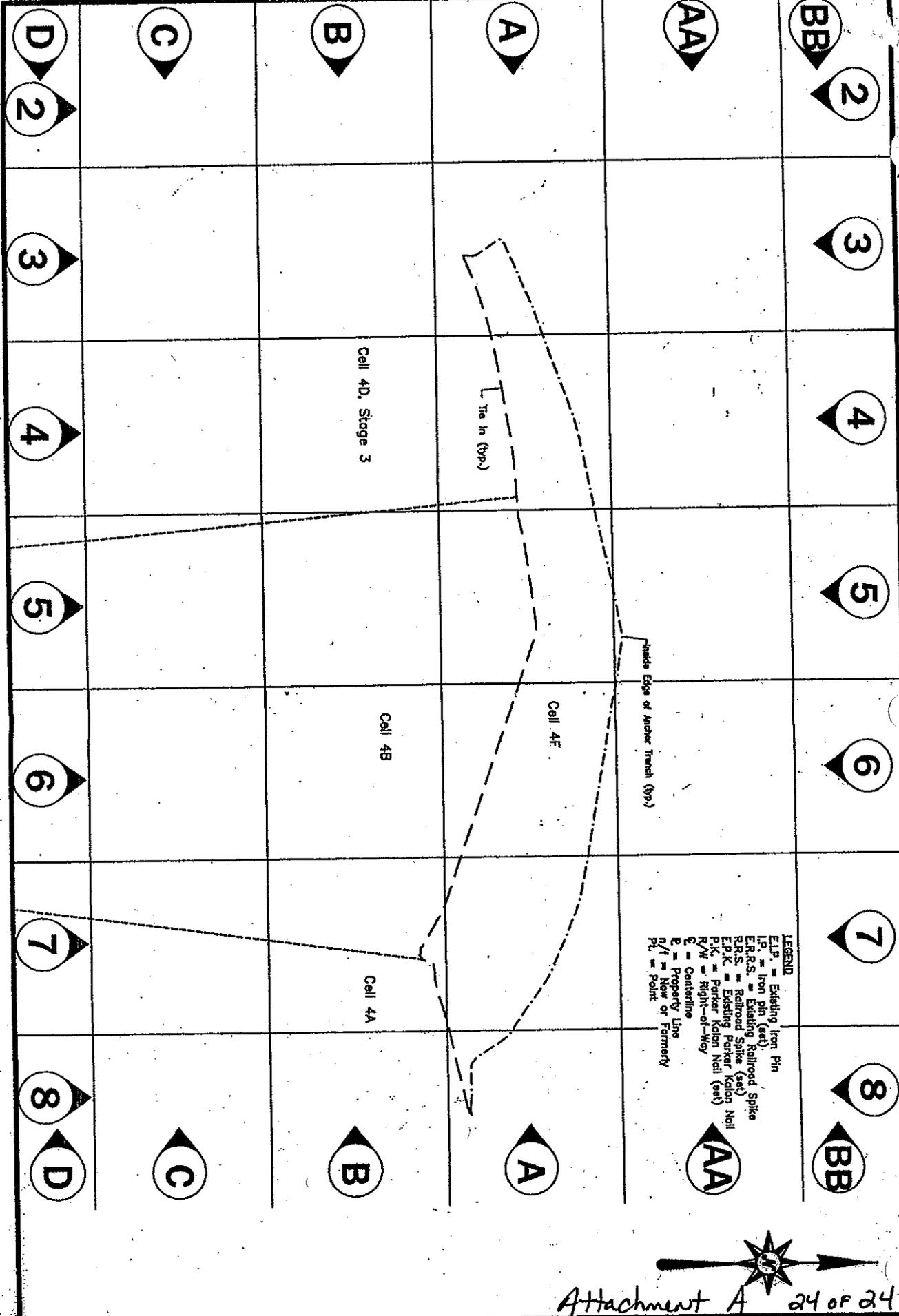
- White - Site
- Yellow - District Office
- Pink - Regional Office

Attachment A  
22 of 24

# ATTACHMENT

## Sample Disposal Grid Sheet

Attachment A  
23 of 24



- LEGEND**
- ELP - Existing Iron Pin
  - IP - Iron pin (set)
  - ER.R.S. - Existing Railroad Spike
  - R.R.S. - Railroad Spike (set)
  - E.P.K. - Existing Porter Keaton Nail
  - P.K. - Porter Keaton Nail (set)
  - R/W - Right-of-Way
  - C - Centerline
  - P - Property Line
  - N/F - New or Formerly
  - PL - Point

  
 Attachment A 24 of 24

**Case:** IESI Complaint Investigation  
**Location:** 2335 Applebutter Road  
**Municipality:** Lower Saucon Township  
**County:** Lehigh  
**Date / Time:** 01/24/2012 / 1030 hrs  
**Photographer:** Walter F. Govern III



Photos of the leachate clean out line. IESI installed a cap with gasket and bolted it closed.



Photos of the leachate clean out line. IESI installed a cap with gasket and bolted it closed.

