



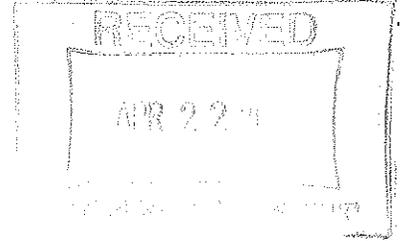
pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BETHLEHEM DISTRICT OFFICE

April 15, 2014

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,

Amy E. Faulch
Solid Waste Specialist
Waste Management Program

ROUTING

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

Enclosure

4530 Bath Pike | Bethlehem, Pennsylvania 18017-9074

610.861.2136 | Fax 610-861-2072

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INSPECTION REPORT – MUNICIPAL WASTE LANDFILL

Site I.D. 100020
 Site Name IESI PA Bethlehem Landfill
 Address 2335 Applebutter Rd.
Bethlehem, PA 18015
 Municipality Lower Saucon Township
 Responsible Official Samuel Donato, Jr.
 Person Interviewed Mike Shelden
 Inspector Amy E. Faulch
 eFACTS ID # PF 268729 SF 266826

Telephone # _____
 Operator Name IESI PA Bethlehem Landfill
 Address 2335 Applebutter Rd.
Bethlehem, PA 18015
 County Northampton
 Title PA District Manager
 Title Operations Manager
 Title Solid Waste Specialist

Comment: _____
 Inspection Date: 04/10/2014 Type: COMPL Results: VIOLS Resolved: / /
 Permit Expiration Date: 04/17/2023 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				
GENERAL PROVISIONS							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required insurance in effect (expiration date <u>12/31/2014</u>)	<input type="checkbox"/>	271.371	1
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Operation in accordance with approved plans and permit.	<input type="checkbox"/>	273.201(c)(2)	2
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation within permit boundaries (vertical and horizontal).	<input type="checkbox"/>	273.201(c)(2)	3
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disposal Timing and sequence as per Section 273.112(1).	<input type="checkbox"/>	273.201(c)(2)	4
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No unapproved wastes or liquids.	<input type="checkbox"/>	273.201(d)-(m)	5
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Isolation distances are adhered to.	<input type="checkbox"/>	273.202(a)	6
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facilities certification requirements followed.	<input type="checkbox"/>	273.203(a), (b)	7
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written Department approval of new construction prior to waste disposal.	<input type="checkbox"/>	273.203(c)	8
DAILY OPERATIONS							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper signs posted.	<input type="checkbox"/>	273.211(a)	9
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site perimeter clearly marked and grid coordinate system in use.	<input type="checkbox"/>	273.311(b)-(d)	10
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper barriers installed around site and access controlled when attendant not present.	<input type="checkbox"/>	273.212(a)-(i)	11
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access roads maintained and negotiable by collection vehicles.	<input type="checkbox"/>	273.213(a)-(i)	12
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved means of measuring and inspected waste utilized.	<input type="checkbox"/>	273.214(a), (b)	13
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate equipment on-site and stand-by equipment available.	<input type="checkbox"/>	273.215(a), (b)	14
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vehicles directed promptly to unloading area and promptly unloaded.	<input type="checkbox"/>	273.216(a), (b)	15
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Solid waste spread and compacted as approved by Department as part of permit.	<input type="checkbox"/>	273.216(c)	16
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 04/10/2014

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
DAILY OPERATIONS (Cont'd)							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not cause or allow attraction, harborage, or breeding of vector.	<input type="checkbox"/>	273.218(a)	19
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator implements nuisance minimization and control plan.	<input checked="" type="checkbox"/>	273.218(b)(1)	20
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator performs regular, frequent, and comprehensive site inspections to reduce potential for offsite odors.	<input checked="" type="checkbox"/>	273.218(b)(2)	21
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator promptly addresses and correct problems and deficiencies discovered during inspections.	<input checked="" type="checkbox"/>	273.218(b)(3)	22
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	273.218(c)	23
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	273.221(a)	24
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator implements radiation protection action plan.	<input checked="" type="checkbox"/>	273.223(a)	25
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	273.223(b)	26
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	273.223(c)	27
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	273.223(d)	28
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator notifies Department immediately and isolates vehicle when radiation dose rates are exceeded.	<input checked="" type="checkbox"/>	273.223(e)	29
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Monitoring equipment is calibrated at frequency specified by manufacturer, but not less than once a year.	<input checked="" 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 checked="" type="checkbox"/>	273.223(g)	31
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	273.232(a)	32
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If intermediate cover requires revegetation, it is established within 30 days.	<input type="checkbox"/>	273.233(e)	33
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Slopes constructed during daily landfilling and intermediate cover activities may not exceed 50 percent.	<input type="checkbox"/>	273.233(f)	34
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not cause or allow waste pollution within or outside the site from operation of the facility.	<input type="checkbox"/>	273.241(a)-(c)	35
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator has restored or replaced adversely affected water supply with an alternative source of like quantity and quality.	<input type="checkbox"/>	273.245(a)	36
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Temporary water supply is provided within 48 hours.	<input type="checkbox"/>	273.245(b)	37
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Permanent water supply is provided within 90 days.	<input type="checkbox"/>	273.245(c)	38
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No waste 15 feet of inside top of the lined perimeter berm.	<input type="checkbox"/>	273.252(e)	39

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
DAILY OPERATIONS (Continued)							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lined perimeter berm 4 ft. high constructed and maintained along edge of the lined disposal area.	<input type="checkbox"/>	273.252(f)	40
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Edge of liner clearly marked.	<input type="checkbox"/>	273.252(g)	41
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Alternate leachate recirculation method may be used if approved if one of the liner systems is a composite liner.	<input type="checkbox"/>	273.274(b)	42
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Underground pipes used to transport leachate to leachate storage impoundments or tanks equipped with secondary containment or comply with 245.445.	<input type="checkbox"/>	273.275(g)	43
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator isolates coal seams, coal outcrops and coal refuse from waste deposits to prevent combustion of waste and damage to liner.	<input type="checkbox"/>	273.291(a)	44
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mine openings within site sealed as approved by Department.	<input type="checkbox"/>	273.291(b)	45
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements plan for controlling potential damage from subsidence submitted and approved under 273.120.	<input type="checkbox"/>	273.291(c)	46
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Landfill designed, constructed, maintained and operated to prevent and minimize potential for fire, explosion, or release of solid waste constituents into air, water, or soil of the Commonwealth.	<input type="checkbox"/>	273.301	47
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency equipment including portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment available. For fire equipment requiring water, facility has a water supply of or adequate quantity and pressure to supply the equipment.	<input type="checkbox"/>	273.302(a)	48
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency equipment tested and maintained.	<input type="checkbox"/>	273.302(c)	49
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate space maintained to allow unobstructed movement of emergency personnel and equipment.	<input type="checkbox"/>	273.302(d)	50
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Litter controlled/collected and barriers/fences in place.	<input type="checkbox"/>	273.220(a)-(c)	51
COVER/SLOPES/REVEGETATION							
<input 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
WATER QUALITY PROTECTION							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Surface and groundwater treatment facilities properly operated and maintained.	<input type="checkbox"/>	273.241(b)	61
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Surface water percolation minimized/prevented.	<input type="checkbox"/>	273.242(b)(1) & 273.234(e)(4)	62

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
<input 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
LINER SYSTEM							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Liner system designed, constructed, operated, and maintained when required.	<input type="checkbox"/>	273.251(a), (b)	65
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Edge of liner requirements adhered to (i.e., no waste within 25 feet if 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.	<input type="checkbox"/>	273.259(a)-(d)	71
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8 feet of select waste placed over protective cover.	<input type="checkbox"/>	273.260	73
LEACHATE TREATMENT							
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate collected and handled through Department approved method(s).	<input checked="" type="checkbox"/>	273.272(a)-(c)	74
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate transportation requirements adhered to.	<input checked="" type="checkbox"/>	273.273(a)-(c)	75
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cessation of site operation if alternate leachate handling not available.	<input checked="" type="checkbox"/>	273.273(d)	76
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate treatment system permitted and fully operational at least 3 years before closure.	<input checked="" type="checkbox"/>	273.273(e)	77
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate recirculation in accordance with regulations.	<input checked="" 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 checked="" 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 checked="" type="checkbox"/>	273.276(a)-(b)	80
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Department notified when remedial action(s) required.	<input checked="" type="checkbox"/>	273.277(1)-(4)	81
WATER QUALITY MONITORING							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved monitoring system installed and maintained.	<input type="checkbox"/>	273.281(a), (b) & 273.283	82
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quarterly and annual monitoring requirements adhered to and results submitted Department within time constraints.	<input type="checkbox"/>	273.284 & 273.285	83
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Groundwater assessment plan submitted and implement as required.	<input type="checkbox"/>	273.286(a)-(g)	84
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Groundwater abatement plan submitted and implemented as required.	<input type="checkbox"/>	273.287(a)-(f)	85
RECORDKEEPING AND REPORTING							
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operational records maintained, available and submitted as required.	<input checked="" type="checkbox"/>	273.288 & 273.311-273.313	86
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	273.311(d)	87

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

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



INSPECTION REPORT COMMENTS

Date of Inspection 04/10/2014 Identification Number 100020

Company/Facility/Site Name IESI PA Bethlehem Landfill

Comments:

The PA Department of Environmental Protection (Department) conducted a complaint inspection on April 10, 2014 at 1007 hours at IESI PA Bethlehem Landfill (IESI). Representing the Department was Ms. Jessica Wagoner of the Air Quality Program and Ms. Amy Faulch (this inspector). Mr. Mike Shelden provided a site tour and was interviewed on behalf of IESI. The weather was described as partly cloudy, 55°F, with winds from the west-northwest at 10.4mph.

4/10/14 Odor Patrol:

Four complaints of odors from IESI were received by the Department on the following dates: 4/4/14 at 1026 hours along Saucon Ave., 4/8/14 at 2117 hours along Applebutter Rd., 4/9/14 hours along Applebutter Rd, and 4/10/14 at 0907 hours along Hilltop Cir. in Palmer Township. On 4/10/14, this inspector and Ms. Wagoner arrived at the complainant's residence along Hilltop Cir. at 1007 hours. This inspector did not confirm an odor with the complainant at their residence at the time of this inspection. The complainant stated that they noticed a "methane" or a "decomposition of landfill garbage" odor on their property at 0900 hours, and the odor had dissipated by 0930 hours. The weather at the time of the complaint was described as clear, 46°F with winds from the west at 5.8 mph. The complainant stated that they have been experiencing more odors recently, mostly in the morning, but occasionally in the evenings. This inspector and Ms. Wagoner conducted an odor patrol along Freemansburg Ave., Berger Rd., and in the area of Chrin Brothers Sanitary Landfill, but did not detect any landfill-related odors during this time. This inspector and Ms. Wagoner then continued an odor patrol in the area of IESI: along Berger Rd., Island Park Rd., Applebutter Rd., Shimersville Rd., Saucon Ave., Roberts Ave., Snyder Ave., Matthews Ave., Mixsell Ave., Adams Ave., Riverside Dr., Redington Rd. and Lower Saucon Rd. A light, intermittent sewage odor was detected along Shimersville Rd. A very light, intermittent wood burning odor was detected along Adams Ave. A very light, intermittent landfill gas odor was detected along Riverside Dr. just east of the "Hill Climb". No other offsite odors were detected. See 4/10/14 odor patrol log for details.

Site Tour:

This inspector and Ms. Wagoner entered the landfill at 1123 hours. Mr. Sheldon stated IESI is currently installing seven extraction wells and tying the western gas collection loop into the header. IESI is also repairing some leachate seeps along the southern face of the landfill. A gas well was open this morning for repair in Cell 4C, and a leachate seep was being repaired in Cell 4D during the time of this inspection, as per Mr. Sheldon. IESI's flare was not running at the time of this inspection because of the well tie-in work, and the Bethlehem Renewable Energy (BRE) Plant was shut down for maintenance, as per Mr. Sheldon. The working face was observed in Cell 4E. Three trucks were dumping at the working face at the time of this inspection. A light working face odor was detected from the southwest of the working face.

A light to moderate landfill gas and working face odor was detected near the maintenance shop and at the eastern edge of the MSE berm. This odor was traced to gas well LC-5, just upslope from the maintenance building. This inspector observed an open pit excavated around gas well LC-5, approximately 6 feet in diameter. Exposed waste was observed in the open pit, and a strong "sharp, cheesy" leachate, garbage and landfill gas odor was detected in the immediate area of the pit around LC-5. Mr. Sheldon explained that the pit was excavated at least a week ago as part of the well tie-in work. This inspector also observed two leachate seeps on the slope to either side of gas well LC-5. Mr. Sheldon stated that he would have the pit covered and would begin leachate seep repair work in this area this afternoon and tomorrow.

Mr. Sheldon stated that an offsite odor patrol had not yet been conducted when this inspector entered the landfill on the date of this inspection. This inspector, Ms. Wagoner and Mr. Sheldon conducted an odor patrol at 1204 hours along Applebutter Rd., Shimersville Rd., Riverside Dr., Redington Rd. and Lower Saucon Rd. No offsite odors were detected at this time.

The strong "sharp, cheesy" leachate, garbage and landfill gas odor mixture detected on site could not be conclusively connected to the character and intensity of the very light, intermittent landfill gas odor detected along Riverside Dr. No malodor violation could be determined as a result of this investigation.

Line item # 20-23: : IESI's daily inspection logs, offsite odor patrols, odor control measures and other nuisance control measures were not reviewed by this inspector to determine compliance with their Nuisance Minimization and Control Plan.

Line item #24: Daily tonnage records were not reviewed during this inspection.

Line item #25-31: Radiation records were not reviewed during this inspection.

Line item #32: The open pit excavated around gas well LC-5 was not properly covered for at least one week, up to and including the date of this inspection. Exposed waste and odors were present at the excavation.

Line item #74-81: Leachate and wastewater treatment data were not reviewed during this inspection.

Line item #86-87: Daily operational records were not reviewed during this inspection.

Line item #91, 93: On the date of this inspection, IESI was conducting gas well tie-in work.

4/11/14 Odor Patrol:

On 4/11/14, this inspector returned to Hilltop Cir. at 0900 hours. The weather was described as scattered clouds, 64.9°F, with winds from the southwest at 5.8 mph. At 1000 hours, this inspector detected a very light, intermittent "mulch" odor along Hillton Cir. This inspector continued an odor patrol along Mt. View Ave., Toursdale Dr., Sutton Rd., Overlook Cir., Stone Crossing Rd., Southwood Dr., Freemansburg Ave., Rt. 33-S, I-78-W, Rt. 412, Shimersville Rd., Saucon Ave., Roberts Ave., Snyder Ave., Matthews Ave., Mixsell Ave., Adams Ave., Riverside Dr., Redington Rd., Lower Saucon Rd., Applebutter Rd., Ringhoffer Rd., Easton Rd. and Sherry Hill Rd. A very light, intermittent landfill gas odor was detected along Overlook Cir. A very light, intermittent landfill gas odor was detected on Rt. 33-S, on the Lehigh River bridge. A moderate, intermittent "burning rubber" odor was detected along I-78W at mile 68. A light, intermittent car exhaust and "burning plastic" odor was detected along Rt. 412. A moderate, persistent sewage odor was detected along Shimersville Rd. near the sewage treatment plant. A light intermittent landfill gas and garbage odor was detected along Riverside Dr. near the Steel City Gun Club entrance. A light, intermittent ammonia and manure odor was detected along Applebutter Rd. near the goat farm, and a moderate, intermittent sewage odor was detected along Applebutter Rd. near the sewage treatment plant. See 4/11/14 odor patrol log for details.

VIOLATIONS:

1. IESI failed to operate in accordance with approved plans and Permit #100020, in violation of 25 PA Code §273.201(c)(2).
2. IESI failed to place a uniform cover of the approved daily cover material on exposed solid waste at the end of each working day, or at the end of every 24 hours, whichever interval is less, in violation of 25 PA Code §273.232(a).

Mr. Walter F. Govern III will follow-up with additional investigation at his next inspection. This concludes this inspection report. AR 4/15/14

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.

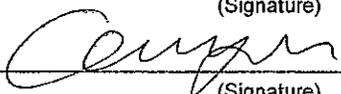
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

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 Certified Mail #70081830000364501992

Date _____

(Signature)

Inspector 

Date 4/15/14

(Signature)

Investigator: A Feuchth/S Wagoner Date: 4/10/14
 Weather Conditions: partly cloudy, 55°F, wind 10.4 WNW

2261783
 IESI PA BETHLEHEM LANDFILL
 ODOR PATROL SURVEY

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
Hilltop Circle	1007	N			
Freemansburg Ave	1020	N			
Berger Rd	1024	N			
ODOR PATROL @ CHAZIN					
Berger Rd	1100	N			
Island Park Rd	1101	N			
Apple Butter Rd	1102	N			
Shinersville	1108	SL	1	S	light, intermittent sewage odor
Saucen Ave	1109	N			
Roberts Ave	1110	N			
Snudger Ave	1110	N			
Masthous Ave	1110	N			
Mixsell Ave	1111	N			
Adams Ave	1111	SL	1	D	very light, intermittent wood burning odor
Riverside	1112	SL	1	LFG	very light, intermittent gas odor just east of Hill Climax
Bedington	1116	N			
Lur. Saucen Rd	1119	N			
Apple Butter Rd	1121	N			

Investigator: A. Faulich Date: 4/11/14
 Weather Conditions: Scattered clouds, 64, 90°F, wind 5-8 SW

2261741
 IESI PA BETHLEHEM LANDFILL
 ODOR PATROL SURVEY

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
Hilltop Cir.	966	N			
Hilltop Cir.	1006	SL	1	O	very light, intermittent "mudch" odor
Hilltop Cir.	1030	N			
Mt. View Ave	1031	N			
Toursdale Dr.	1031	N			
Sutton Rd	1032	N			
Overlook Cir	1033	SL	1	LFG	very light, intermittent gas odor. wind appears light from WSW
Sutton Rd	1034	N			
Stone Crossing Rd	1036	N			
Southwood Dr.	1039	N			
Toursdale Dr.	1039	N			
Sutton Rd	1040	N			
Overlook Cir.	1040	N			
Toursdale Dr.	1042	N			
Mt. View Ave	1043	N			
Stone Crossing Rd	1044	N			
Freemansbury Ave	1045	N			
Rt. 33-S	1048	SL	1	LFG	very light, intermittent gas odor on Rt. 33 bridge over Lehigh River

Investigator: A. Fowler Date: 4/11/14
 Weather Conditions: Scattered clouds, 64.9°F, wind 5.8 SW

IESI PA BETHLEHEM LANDFILL
 ODOR PATROL SURVEY

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
1-78-N	1051	M	1	O	Moderate, intermittent "burning rubber" odor @ mile 68
Rt. 412	1055	SL	1	O	light, intermittent car exhaust & "burning plastic" odor
Shmersville	1059	M	P	S	moderate, persistent sewage odor near Sewage Treatment Plant
Saucen Ave	1101	N			
Roberts Ave	1102	N			
Snyder Ave	1102	N			
Matthews Ave	1103	N			
Mixsell Ave	1103	N			
Adams Ave	1104	N			
Riverside	1105	SL	1	LFG	light, intermittent gas & garbage odor near steel city gas club entrance
Redington	1118	N			
Lwr. Saucen Rd	1122	N			
Applebutter Rd	1124	N			
Binghoffer Rd	1127	N			
Easton Rd	1129	N			
Lwr. Saucen Rd	1131	N			
Applebutter Rd	1134	N			
Sherry Hill Rd	1135	N			

Original: PA DEP NERO WM File-thru J. Leskosky

Cc: BDO WM File- thru A. Faulch

Facility-sent via Certified Mail

Lower Saucon Township

D. Fisher

S. French

W. Govern

A. Faulch

M. Nestor: CTS ID#303600