



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BETHLEHEM DISTRICT OFFICE

May 8, 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,

Walter F. Govern III
Solid Waste Specialist
Waste Management Program

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

Enclosure



INSPECTION REPORT – MUNICIPAL WASTE LANDFILL

Site I.D. 255983
 Site Name IESI PA BETHLEHEM LANDFILL
 Address 2335 APPLEBUTTER RD
BETHLEHEM, PA 10817
 Municipality 8924 LOWER SAUCON
 Responsible Official SAMUEL DONATO, JR.
 Person Interviewed AL SCHLEYER
 Inspector WALTER F. GOVERN
 eFACTS ID # PF 268729 SF 266826

Telephone # _____
 Operator Name IESI PA BETHLEHEM LANDFILL
 Address 2335 APPLEBUTTER RD
BETHLEHEM, PA 18017
 County NORTHAMPTON
 Title PA DISTRICT MANAGER
 Title COMPLIANCE MANAGER
 Title SOLID WASTE SPECIALIST

Comment: Routine Complete Inspection

Inspection Date: 04/22/2014 Type: RTNC Results: NO VIOLS Resolved: / /
 Permit Expiration Date: 4/17/2023 Days/Week Operated: 6 Max. Daily Volume: 1800

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

STATUS				REVISION	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation in accordance with approved plans and permit.	<input type="checkbox"/>	273.201(c)(2)	2
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation within permit boundaries (vertical and horizontal).	<input type="checkbox"/>	273.201(c)(2)	3
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disposal Timing and sequence as per Section 273.112(1).	<input type="checkbox"/>	273.201(c)(2)	4
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No unapproved wastes or liquids.	<input type="checkbox"/>	273.201(d)-(m)	5
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Isolation distances are adhered to.	<input type="checkbox"/>	273.202(a)	6
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facilities certification requirements followed.	<input type="checkbox"/>	273.203(a), (b)	7
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written Department approval of new construction prior to waste disposal.	<input type="checkbox"/>	273.203(c)	8
DAILY OPERATIONS							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper signs posted.	<input type="checkbox"/>	273.211(a)	9
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site perimeter clearly marked and grid coordinate system in use.	<input type="checkbox"/>	273.311(b)-(d)	10
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper barriers installed around site and access controlled when attendant not present.	<input type="checkbox"/>	273.212(a)-(i)	11
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access roads maintained and negotiable by collection vehicles.	<input type="checkbox"/>	273.213(a)-(i)	12
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved means of measuring and inspected waste utilized.	<input type="checkbox"/>	273.214(a), (b)	13
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate equipment on-site and stand-by equipment available.	<input type="checkbox"/>	273.215(a), (b)	14
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vehicles directed promptly to unloading area and promptly unloaded.	<input type="checkbox"/>	273.216(a), (b)	15
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Solid waste spread and compacted as approved by Department as part of permit.	<input type="checkbox"/>	273.216(c)	16
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements fugitive air contaminant control/measures and prevents and controls air pollution including no exceeding of ambient air quality standards, no open burning, and minimizing generation of fugitive dust emissions from facility.	<input type="checkbox"/>	273.217(a)	17
<input 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	04/22/2014

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

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

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

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

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

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

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



INSPECTION REPORT COMMENTS

Date of Inspection 04/22/2014 Identification Number 100020

Company/Facility/Site Name IESI PA BETHLEHEM LANDFILL

Comments:

On April 22, 2014, a routine monthly inspection was conducted in the afternoon at IESI PA Bethlehem Landfill (IESI). Also during this inspection, an investigation was conducted as a result of odor complaints received by the Department on March 27, 2014, April 1, 2014, April 4, 2014, April 8, 2014, April 9, 2014, and April 10, 2014. Attending the inspection was Walter F. Govern III (this inspector) representing the PA Department of Environmental Protection (Department). Representing IESI PA Bethlehem Landfill (IESI) during this inspection was Al Schleyer, Compliance Manager. During the time of this inspection it was sunny, 54°F, wind out of the northwest at 21 mph, gusting at 30 mph. (www.accuweather.com)

On April 8, 2014, Susan French was onsite representing the Department. On April 10, 2014, Amy Faulch and Jessica Wagoner were onsite conducting a complaint inspection. On April 23, 2014, Bharat Bham was onsite representing the Department.

Prior to entering the landfill for the inspection, an odor patrol was conducted along Applebutter Road, throughout Steel City and around the north side of the landfill on Riverside Drive, out to Easton Road and along Skyline Drive. During the time of this inspection this inspector observed a slight intermittent landfill gas odor along Ringhoffer Road and the intersection of Ringhoffer Road and Applebutter Road.

The entrance road to the facility and the access roads to the working face were clean and free of litter and debris. Some windblown litter was observed on the north side of the landfill. Mr. Schleyer stated that the laborers are currently collecting litter on the west slope and that they are working towards the north side of the landfill.

The flare was in operation at IESI during the time of this inspection. Landfill gas was being burned in the Flare at 1658°F at a flow of 938 scfm. Landfill gas from IESI was also being burned at the Bethlehem Renewable Energy (BRE) Plant adjacent the landfill during the time of this inspection.

IESI plans to start a capping project in May. The capping project is expected to cover approximately three acres of the landfill.

During a complaint inspection conducted by Amy Faulch and Jessica Wagoner on 04/10/2014, an area of exposed waste was observed around gas well LC-5. During this inspection, this inspector observed that the area of exposed waste had been covered since the last inspection. No odors were observed by this inspector around gas well LC-5.

On the south slope of the landfill, IESI was conducting a large seep repair. During this seep repair, the excavator damaged the liner. The liner has been temporarily patched and will be permanently repaired by the end of the week. IESI will fill in the excavation with soil to help minimize odors until the permanent repairs can be completed. While observing this area, this inspector was able to detect a similar odor to the odor this inspector experienced along Ringhoffer Road prior to this inspection. No malodors were detected off-site during the time of this inspection.

Cell 4E Stage II was the area accepting waste during the time of this inspection. There were four trucks dumping at the working face during the time this inspector was observing the working face. Three trucks were waiting to dump during the time of this inspection. Tippers are not yet in use at the landfill.

The radiation logs for April to the date of this inspection were reviewed. There was one radiation hit since this inspector's last inspection. On 04/17/2014, Tc-99 was detected. The driver informed the scale operator that he recently had a medical procedure done. The truck was inspected and no radiation hits were detected on the load of waste. The load was permitted to be dumped at the landfill. Log sheets were reviewed showing that the radiation monitors were detecting hits on known sources. Calibration for the radiation monitor was conducted on 06/24/2013 and is due 06/24/2014.

Daily tonnage reports were observed for April to the date of this inspection. The weight logs appear complete. The maximum daily tonnage observed in April to the date of this inspection was logged on 04/22/2014 at 1,740.0 tons. The overweight report for the month of April logged 36 overweight trucks to the date of this inspection. Seven of the trucks were over the 3% mark. A copy of the overweight trucks report for April is attached to this report. The scale was last

calibrated on 12/30/2013. It is due for calibration in June 2014.

IESI ran an advertisement for public drop off at the landfill from January 3rd, 4th, and 5th, 2014 in the Express Times.

Insurance certificates were reviewed and are valid. The certificate expires 12/31/2014.

COMPLAINT INVESTGATIONS

On 03/27/2014 at approx. 0800 hrs and 1500 hrs: An individual reported a trash odor at their residence. These times the flare was not operating as it was down for maintenance. The energy plant adjacent IESI was burning landfill gas at 2350 scfm at 0800 hrs and 2135 scfm at 1500 hrs. IESI appeared to be implementing their Nuisance Minimization and Control Plan as required.

On 04/01/2014 at approx. 1031 hrs: An individual reported an odor coming from the landfill along Easton Rd. During the time of the complaint, the flare was again off-line, this time, for a header connection. The flare was off-line from 0930 hrs to 1230 hrs. Flare was running by 1230 hrs. The energy plant adjacent IESI was burning landfill gas at 2181 scfm during the time of this complaint. IESI appeared to be implementing their Nuisance Minimization and Control Plan as required.

On 04/04/2014 at approx. 1026 hrs: An individual reported an odor coming from the landfill along Saucon Rd. During the time of the complaint, the flare was burning landfill gas at 1035 scfm. The energy plant adjacent IESI was burning landfill gas at 2078 scfm during the time of this complaint. Landfill gas was being consumed by the flare and the adjacent energy plant at a total of 3113 scfm during the time of this complaint. Mr. Schleyer stated that IESI was working on some seep repairs throughout the day on 04/04/2014. IESI appeared to be implementing their Nuisance Minimization and Control Plan as required.

On 04/08/2014 (time not provided at the time of this inspection): An individual reported an odor coming from the landfill while driving. The flare was burning landfill gas at an average flow of 925 scfm during the day. The energy plant adjacent IESI was burning landfill gas at an average flow of 2024 scfm during the day. Landfill gas was being consumed by the flare and the adjacent energy plant at an average total of 2949 scfm throughout the day. There were no flare or energy plant shut downs on 04/08/2014. IESI appeared to be implementing their Nuisance Minimization and Control Plan as required.

On 04/09/2014 (time not provided at the time of this inspection): An individual reported an odor coming from the landfill while driving. The flare was burning landfill gas at an average flow of 900 scfm during the day. The energy plant adjacent IESI was burning landfill gas at an average flow of 2100 scfm during the day. Landfill gas was being consumed by the flare and the adjacent energy plant at an average total of 3000 scfm throughout the day. There were no flare or energy plant shut downs on 04/09/2014. IESI appeared to be implementing their Nuisance Minimization and Control Plan as required.

On 04/10/2014 at approx. 0907 hrs: An individual reported an odor coming from the landfill while driving on Applebutter Rd. The flare was burning landfill gas at 2070 scfm during the time of this complaint. The energy plant adjacent IESI was shut down for routine maintenance from 0730 hrs to 1622 hrs. The energy plant was running again after 1622 hrs.

This concludes this inspection report.

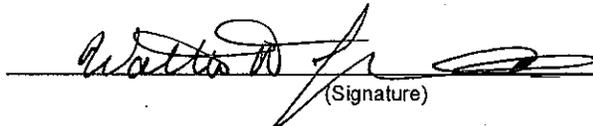
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other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

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

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

Person Interviewed Sent via 1st Class Mail
(Signature)

Date 05/08/2014

Inspector 
(Signature)

Date 05/08/2014

IESI PA BETHLEHEM LANDFILL
 QDOR PATROL SURVEY

Date: 04/22/2014

Investigator: Walter F. Gorman III

Weather Conditions: Sunny, 54°F w/ wind out of NW at mph, gust 30 mph www.accuweather.com

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
Shinersville Rd.	1321	N	N	—	
Sawcon Rd.	1324	SL	P	O	Woody Odor - Resident observed splitting wood/Chippings
Roberts Ave	1325	N	N	—	
Mixsell Ave	1327	N	N	—	
Adams Ave	1328	N	N	—	
Riverside Dr.	1333	N	N	—	
Redington Rd.	1336	N	N	—	Pern DOT observed collecting litter along Riverside Dr.
L. Sawcon Rd.	1339	N	N	—	
Applebutter Rd.	1341	SL	I	LFG	Slight Intermittent LFG Odor. Here + Grove.
Ringhoffer Rd.	1345	SL	I	LFG	" " " " " "
Easton Rd.	1348	N	N	—	
Ringhoffer Rd.	1351	SL	I	LFG	Slight Intermittent LFG Odor. Here + Grove
Applebutter Rd.	1355	N	N	—	
IESI Entrance	1355	N	N	—	
Applebutter Rd.	1357	N	N	—	
Skyline Dr.	1407	N	N	—	
Applebutter Rd.	1409	N	N	—	
Entered IESI	1411	—	—	—	Entered IESI to Conduct Routine Inspection

* END OF ODOR PATROL *

**The Following Odor Patrol Logs
Are General Odor Patrols
Not Associated with an IESI Inspection
(General Odor Patrols are Conducted as Time Permits)**

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: Walter F. Gavern III Date: 01/14/2014
Weather Conditions: Raining, 45°F, Wind out of SW @ 4 mph

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
					eFACTS IO# 2238272
Sawcon Ave	1445	N	N	—	
Roberts Ave	1446	SL	P	O	Wood Burning Odor
Mixsell Ave	1448	SL	P	O	Wood Burning Odor
Adams Ave	1450	SL	I	O	Paint Booth Odors @ Big Pete's Auto Repairs
Riverside Drive	1455	N	N	—	
Scrap Yard	1456	SL	I	O	Very Slight Auto Odor @ Scrap Yard
Redington Drive	1459	N	N	—	
Lower Sawcon Rd.	1502	N	N	—	
Applebutter Rd.	1508	SL	I	LFG	Slight Landfill Gas Odor @ The Autobody/Scrap Yard on Rd. ^{Applebutter}
Skyline Dr.	1517	N	N	—	
Applebutter Rd.	1522	SL	I	O	Manure Odor @ Farm West of Landfill
IESI GATE	1524	SL	I	LFG	Slight Landfill Gas Odor @ Gate of Landfill
Applebutter Rd.	1525	N	N	—	Town around @ Storage facility No Odors
IESI GATE	1526	N	N	—	
Applebutter Rd.	1528	SL	I	O	Manure Odor @ Farm West of Landfill
Int. Applebutter Rd.	1529	SL	P	S	Sewage Odors from Brown Sewer Smith.
End Patrol	1530				

2232253

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: A. Fowlch Date: 12/26/13
Weather Conditions: cloudy, 33°F, wind SW

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
Shinersville	1308	M	P	S	moderate Sewage odor near Sew. trt. plant
Applebutter	1311	M	P	S	moderate sewage odor near Sew. trt. plant
Binghoffer	1315	N			
Sherry Hill	1317	N			
Applebutter	1320	N			
Lower Sawcon Rd	1321	N			
Bedington	1323	SL	1	LFG?	very light, intermittent odor - possibly landfill gas?
Riverside	1327	N			
Bedington	1328	SL	1	O	very light wood burning odor
Lower Sawcon Rd	1331	SL	1	O	light wood burning odor
Applebutter	1333	M	P	S	moderate Sewage odor near Sew. trt. plant
Shinersville	1340	N			
Sawcon Ave	1341	N			
Roberts	1342	N			
Mixsell	1342	SL	P	O	light wood burning odor
Adams	1344	SL	1	O	light "manure" odor
Riverside	1345	SL	P	O	very light wood burning odor
Bedington	1348	SL	1	LFG?	very light, intermittent odor - possibly landfill gas?

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: Walter F. Govers III Date: 12/24/2013
Weather Conditions: 29°F, Wind WNW @ 7mph Sunny

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
Riverside Dr.	0924	N	N	-	It's Garbage Collections Day in Steel City. eFACTS ID# 2231990
Sawcon Ave.	0924	N	N	-	
Roberts Ave.	0926	SL	I	G	Garbage Truck pulled out in front of this inspection
Mixell Ave.	0927	N	N	-	
Adams Ave.	0928	N	N	-	
Riverside Dr.	0930	N	N	-	
Redington Rd.	0934	N	N	-	
Lower Sawcon Rd.	0935	N	N	-	
Applebutter Rd.	0938	N	N	-	
Skyline Dr.	0944	N	N	-	
Applebutter Rd.	0946	N	N	-	
Shimersville Rd.	0947	N	N	-	

2231778

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: A. Fawcch / S. Wagoner Date: 12/23/13
Weather Conditions: Rain, 53.6°F, wind 10.4 NW

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
Rt. 412	1102	SL	I	O	light "dryer sheet" odor
Shimmersville Rd.	1112	M	P	S	moderate sewage odor
Apple Butter Rd	1114	M	P	S	moderate sewage odor
Apple Butter Rd	1115	M	I	O	moderate ammonia & manure odor near goat farm.
Apple Butter Rd	1119	M	P	S	moderate sewage odor
SKYLINE	1120	SL	P	S	light sewage odor right top of hill, no odor past top of hill
Apple Butter	1125	SL	P	S	light sewage odor
Shimmersville	1126	N			
Sawcon Ave	1126	M	I	O	moderate wood burning odor
Roberts Ave	1127	N			
Snyder Ave	1127	N			
Matthews Ave	1128	N			
Riverside Dr.	1129	N			
Main St	1131	N			
AC 12/23/13					