

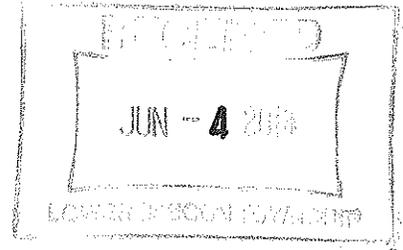


# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BETHLEHEM DISTRICT OFFICE

June 3, 2013



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

Attn: Mr. Jack Cahalan

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

Dear Mr. Cahalan:

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

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

Sincerely,

Walter F. Govern III  
Solid Waste Specialist  
Waste Management Program

**ROUTING**

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

4530 Bath Pike | Bethlehem, Pennsylvania 18017-9074

610.861.2136 | Fax 610-861-2072

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## INSPECTION REPORT - MUNICIPAL WASTE LANDFILL

|  |   |   |  |
|--|---|---|--|
| Permit Number <u>100020</u>                            |   | Employer I.D. Number (EIN) _____                            |  |
| EPA I.D. Number _____                                  |   | Operator Name <u>IESI PA BETHLEHEM LDFL CORP</u>            |  |
| Facility Name <u>IESI PA BETHLEHEM LDFL</u>            |   | Address <u>2335 APPLEBUTTER RD</u>                          |  |
| Address <u>2335 APPLEBUTTER RD</u>                     |   | Address <u>2335 APPLEBUTTER RD</u>                          |  |
| SR <u>2012</u>   |   | City <u>BETHLEHEM</u> State <u>PA</u> Zip <u>18015</u>      |  |
| City <u>BETHLEHEM</u> State <u>PA</u> Zip <u>18015</u> |   | City <u>BETHLEHEM</u> State <u>PA</u> Zip <u>18015-6004</u> |  |
| Municipality <u>8924 Lower Saucon</u>                  |   | County <u>Northampton</u>                                   |  |
| Responsible Official <u>SAMUEL DONATO, JR.</u>         |   | Title <u>PA. DISTRICT MANAGER</u>                           |  |
| Person Interviewed <u>Samuel Donato Jr.</u>            |   | Title <u>PA District Manager</u>                            |  |
| Inspector <u>Walter F Govern</u>                       |   | Telephone # _____ x _____                                   |  |
| eFACTS ID # Client <u>112995</u> Site <u>255983</u>    |   | Title <u>Solid Waste Specialist</u>                         |  |
| PF <u>268729</u> SF <u>266826</u>                      |   | _____   |  |
| Comment _____  |   |   |  |
| Inspection Date Start                                  | <u>May 29, 2013</u>                     | Inspection Time Start                                       | <u>0800 hrs</u>                                    |
| Inspection Date End                                    | <u>May 29, 2013</u>                     | Inspection Time End   | <u>1600 hrs</u>                                    |
| Inspection Type  | <u>RTNC Routine/Complete Inspection</u> |   | Inspection Result <u>NOVIO No Violations Noted</u> |

Permit Expiration Date: 04/17/2023 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Required insurance in effect (expiration date <u>01/31/2014</u> ).                      | <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 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        |

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                        |   |                          |                  |           |
| <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 checked="" type="checkbox"/> | <input 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"/> | <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"/> | <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"/> | <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 checked="" type="checkbox"/> | <input 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"/> | <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"/> | <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 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 type="checkbox"/> | 273.233(f)       | 34        |

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| STATUS                              |                                     |                                     |                          |                          | REQUIREMENT  | COMMENTS ATTACHED        | CHAPTER CITATION               | LINE ITEM |
|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--|--------------------------|--------------------------------|-----------|
| 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 type="checkbox"/>            | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> | <input 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) 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 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 type="checkbox"/> | 273.234(g)                     | 59        |

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                        |  |                          |  |           |
| <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Minimum revegetation and successful revegetation requirements adhered to.  | <input type="checkbox"/> | 273.235(a)-(e)<br>AND 273.236(a),<br>(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)<br>AND<br>273.234(e)(4)    | 62        |
| <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" 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"/> | <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)<br>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 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"/> | <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)<br>AND 273.283           | 82        |

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                        |  |                          |                             |           |
| <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 type="checkbox"/>                    | <input checked="" 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 checked="" type="checkbox"/>         | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | On or before January 15 each year, operator informs municipality in writing of weight and type of materials recycled previous year.    | <input type="checkbox"/> | 273.332(e)                  | 101       |
| <b>SPECIAL HANDLING AND RESIDUAL WASTES</b> |                                     |                          |                          |                          |  |                          |                             |           |
| <input checked="" type="checkbox"/>         | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <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 checked="" 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 May 29, 2013, a routine complete inspection was conducted at IESI PA Bethlehem Landfill (IESI). Representing the PA Department of Environmental Protection (Department) was Solid Waste Specialist Walter F. Govern III (this inspector). Representing IESI PA Bethlehem Landfill (IESI) during this inspection was Sam Donato, PA District Manager.

On May 6, 2013 and May 16, 2013, Sheena Ripple was onsite at IESI representing the Department's Water Quality Program. On May 9, 2013, Susan French was onsite at IESI 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. No landfill related odors were observed during this odor patrol. No malodors were observed during this inspection. IESI appears to be implementing their Nuisance Minimization and Control Plan as required.

The entrance road to the facility and the access roads to the working face were clean and free of litter and debris. No windblown litter was observed in the trees within the landfills fences. No windblown litter was observed on the slopes of the landfill during the time of this inspection.

The flare was in operation at IESI during the time of this inspection. It was burning landfill gas at a temperature of 1600°F at a flow rate of 2493 scfm.

*4E w/for 5/29/13*  
Cell 4Q Stage I is the area that is accepting waste during the time of this inspection. There was one truck dumping at the working face during the time this inspector was observing the working face. No trucks were waiting to dump during the time of this inspection. No landfill gas odors were detected during the time of this inspection.

Construction of the new disposal cell is scheduled to begin in early June. This inspector observed a blast event at the landfill in preparation to clear soil and rock for the new cell.

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

### Comments:

During the last host municipality inspection, the host municipality inspector observed an area along the western high wall where some erosion occurred. IESI immediately addressed the issue and during the time of this inspection, this inspector observed that the sedimentation channel that runs along the base of the western high wall was clear of material. This inspector also observed no immediate movement along the western high wall during the time of the blast event which occurred immediately adjacent the western high wall were erosions occurred. Mr. Donato explained that if erosions continued to occur along the western high wall, then IESI will implement conditions in the permit mod, specifically, IESI will "shoot" the wall with posi-shell to stabilize the face of the high wall.

The radiation logs for May to the date of this inspection were reviewed. There were two radiation hits since this inspector's last inspection. On 05/03/13 and 05/08/13, Tc99 was detected at level 1 alarms. The loads were disposed of at IESI as per the Radiation Action Monitoring Plan. Log sheets were reviewed showing that the radiation monitors were detecting hits on known sources. Radiation monitors were last calibrated on June 20, 2012. The radiation monitors are due for calibration on June 20, 2013.

Daily tonnage reports were observed for May. The weight logs appear complete. The maximum daily tonnage observed in May to the date of this inspection was logged on 05/21/2013 at 1,528.7 tons. The overweight report for the month of March logged 38 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 May is attached to this report.

IESI ran an advertisement for public drop off at the landfill from January 1<sup>st</sup> through January 3<sup>rd</sup> in the Morning Call.

Insurance certificates were reviewed and are valid. The certificate expires 01/31/2014.

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

Samuel J. Bousky  
(Signature)

Date

5-29-2013

Inspector

[Signature]  
(Signature)

Date

05/29/2013

