



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BETHLEHEM DISTRICT OFFICE



October 23, 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
- Asst. Mgr.
- Zoning
- Finance
- Police
- P. Works
- P/C
- P & R
- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EMC
- Other

Enclosure

4530 Bath Pike | Bethlehem, Pennsylvania 18017-9074

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INSPECTION REPORT – MUNICIPAL WASTE LANDFILL

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

Telephone # _____
 Operator Name IESI PA BETHLEHEM LANDFILL
 Address 2335 APPLEBUTTER RD
BETHLEHEM, PA 18015
 County NORTHAMPTON
 Title PA DISTRICT MANAGER
 Title COMPLIANCE MANAGER
 Title SOLID WASTE SPECIALIST / AIR QUALITY SPEC

Comment: _____

Inspection Date: 10/21/2014 Type: Routine Partial Inspection Results: NOVIO 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 10/21/2014

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If intermediate cover requires revegetation, it is established within 30 days.	<input type="checkbox"/>	273.233(e)	33
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Slopes constructed during daily landfilling and intermediate cover activities may not exceed 50 percent.	<input type="checkbox"/>	273.233(f)	34
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not cause or allow waste pollution within or outside the site from operation of the facility.	<input type="checkbox"/>	273.241(a)-(c)	35
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator has restored or replaced adversely affected water supply with an alternative source of like quantity and quality.	<input type="checkbox"/>	273.245(a)	36
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Temporary water supply is provided within 48 hours.	<input type="checkbox"/>	273.245(b)	37
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Permanent water supply is provided within 90 days.	<input type="checkbox"/>	273.245(c)	38
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No waste 15 feet of inside top of the lined perimeter berm.	<input type="checkbox"/>	273.252(e)	39

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

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

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

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

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
<input 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 if adjacent liner, 4 feet high lined berm, to prevent lateral escape of leachate, adequate spacing on inside of berm to collect stormwater and sediment).	<input type="checkbox"/>	273.252(d)	66
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate detection zone monitored weekly.	<input type="checkbox"/>	273.255(c)	67
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover protects primary liner and leachate collection system and allows free flow of leachate into the collection system.	<input type="checkbox"/>	273.257(a)	68
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover meets minimum requirements and at least 18 inches thick.	<input type="checkbox"/>	273.257(b)	69
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collection system within protective cover meets minimum requirements.	<input type="checkbox"/>	273.258(a), (b)	70
<input 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate collected and handled through Department approved method(s).	<input type="checkbox"/>	273.272(a)-(c)	74
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate transportation requirements adhered to.	<input type="checkbox"/>	273.273(a)-(c)	75
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cessation of site operation if alternate leachate handling not available.	<input type="checkbox"/>	273.273(d)	76
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate treatment system permitted and fully operational at least 3 years before closure.	<input type="checkbox"/>	273.273(e)	77
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate recirculation in accordance with regulations.	<input type="checkbox"/>	273.274(1)-(4)	78
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallons, whichever is greater.	<input type="checkbox"/>	273.275(a)-(f)	79
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leachate flow rate measured daily; analyzed quarterly.	<input type="checkbox"/>	273.276(a)-(b)	80
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Gas venting and monitoring in accordance with approved plans.	<input type="checkbox"/>	273.292(a)-(d)	90
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Combustible gas levels not exceeded.	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Gas recovery conducted as per approved plan and §273.293, including annual analysis.	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Salvaged materials stored in an approved area or transported offsite.	<input type="checkbox"/>	273.331(c)	97
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Drop off center established for at least three recyclables.	<input type="checkbox"/>	273.332(a)	98
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Approved public notice of availability of drop off center availability is provided.	<input type="checkbox"/>	273.332(d)	100
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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 10/21/2014 Identification Number 100020

 Company/Facility/Site Name IESI PA BETHLEHEM LANDFILL
Comments:

On October 21, 2014 the Pennsylvania Department of Environmental Protection (Department) conducted a routine partial inspection at IESI PA Bethlehem Landfill (IESI). Walter F. Govern III, Department Solid Waste Specialist, and Tara Redding, Department Air Quality Specialist, were representing the Department during the time of this inspection. Al Schleyer, IESI Compliance Manager represented IESI during the time of this inspection. As this is a routine partial inspection, only the items mentioned below were observed during the time of this inspection, due to time constraints. During the time of this inspection it was mostly sunny, 58°F with wind out of the north (N) at 2 mph. (www.wunderground.com)

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. See attached odor patrol log dated 10/21/2014 for details.

The entrance road to the facility had some mud being tracked out onto Applebutter Road during the time this inspector entered the landfill. Mr. Schleyer had the truck wash running and had a street sweeper cleaning the mud from Applebutter Road during the time of this inspection.

The flare was in operation at IESI during the time of this inspection. Landfill gas was being burned in the Flare at 1677°F at a flow of 1411 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. Upon review of the flare log chart, the flow of landfill gas increased to almost 2800 scfm from October 10, 2014, through October 13, 2014. This was due to BRE being shut down for maintenance. During this time, no odor complaints were received by the Department.

During the time of this inspection, this inspector observed the misting lines installed to assist with odor control. The misters were not on during the time of this inspection. Mr. Schleyer stated that the misters are turned on every morning prior to removing the tarp on the working face. If odors are under control the misters are turned off until needed.

Cell 4E Stage I was the area accepting waste during the time of this inspection. A tipper is onsite and was in use during the time of this inspection. There were three trucks dumping during the time of this inspection and none waiting to dump.

During the time of this inspection, this inspector along with Ms. Redding, and Mr. Schleyer walked the northern slope of Cell 4F, created by the MSE wall. The slope was recently covered with soil and tracked in. The slope was seeded and new vegetation was observed beginning to grow. No odors were detected in this area during the time of this inspection.

Since the last inspection, sixteen new vertical gas collection wells were installed at IESI and one horizontal gas collection well was installed on the southwestern corner of Cell 4E Stage 1.

Calibration for the radiation monitor was conducted on 06/09/2014 and is due 06/09/2015.

COMPLAINT INVESTGATIONS

Please see attached spreadsheet regarding the data collected for the complaints received by the Department since the last inspection.

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 10/23/2014

 Inspector Walter F. Govern III

(Signature)

 Date 10/23/2014

 Page 7 of 7

IESI ODOR COMPLAINT LOG for October 21, 2014 Inspection Report (2335 Applebutter Rd, Bethlehem, PA 18017)

Date	Time	Address	Distance from Landfill (miles)	Weather Data (Wassergas (PAHLEUZ))				Resident Location in Relation to Landfill	Description / Notes	Gas Management Data			Addressed in Insp Report Date
				Skies	Temperature	Wind (out of)	Wind (out of)			Flare (scfm)	BRE (scfm)	Total (scfm)	
08/29/14	1145 hrs	Adams Ave, Steel City	0.923	Broken Clouds	66.1°F	N @ 5.8 mph	NW	Residence	Strong Odor	1455	1560	3015	10/21/2014
08/29/14	1214 hrs	Skyline Dr, Bethlehem	0.883	Broken Clouds	68.1°F	NW @ 3.5 mph	NW	Residence	Strong Odor	1492	1604	3096	10/21/2014
08/29/14	1409 hrs	Skyline Dr, Bethlehem	No Address Provided	Broken Clouds	63.3°F	NW @ 6.0 mph	W	Residence	Strong Odor	1499	1551	3144	10/21/2014
08/29/14	1439 hrs	Skyline Dr, Bethlehem	No Address Provided	Broken Clouds	66.3°F	NNE @ 5.0 mph	W	Residence	Strong Odor	1487	1527	3114	10/21/2014
08/29/14	1516 hrs	Skyline Dr, Bethlehem	0.627	Broken Clouds	67.1°F	NW @ 3.8 mph	W	Residence	Strong Odor and Police Response	1464	1522	3086	10/21/2014
08/29/14	1725 hrs	Skyline Dr, Bethlehem	No Address Provided	Broken Clouds	64.7°F	NNE @ 3.5 mph	W	Residence	Strong Odor	1239	1388	3227	10/21/2014
08/29/14	1826 hrs	Mikell Ave, Steel City	0.801	Broken Clouds	64.3°F	Calm - No Wind	NW	Residence	Strong Odor	1228	1390	3158	10/21/2014
08/29/14	1898 hrs	Adams Ave, Steel City	0.923	Broken Clouds	64.3°F	Calm - No Wind	NW	Residence	Strong Odor	1228	1315	3148	10/21/2014
08/29/14	1851 hrs	Adams Ave, Steel City	0.923	Broken Clouds	64.2°F	Calm - No Wind	NW	Residence	Strong Odor	1228	1342	3170	10/21/2014
08/29/14	1857 hrs	Frite Ave, Steel City	0.950	Broken Clouds	64.2°F	Calm - No Wind	NW	Residence	Strong Odor	1228	1317	3142	10/21/2014
08/29/14	1903 hrs	Saucon Ave, Steel City	0.883	Broken Clouds	64.0°F	NW @ 2.3 mph	NW	Residence	Strong Odor	1224	1317	3141	10/21/2014
08/29/14	2047 hrs	Adams Ave, Steel City	0.923	Broken Clouds	63.2°F	Calm - No Wind	NW	Residence	Strong Odor	1234	1332	3166	10/21/2014
08/29/14	2356 hrs	Saucon Ave, Steel City	0.904	Broken Clouds	63.2°F	Calm - No Wind	NW	Residence	Strong Odor	1219	1315	3134	10/21/2014
08/29/14	1204 hrs	Frite Ave, Steel City	0.950	Broken Clouds	61.5°F	NW @ 2.3 mph	NW	Residence	Strong Odor coming from IESI landfill	1222	2002	3224	10/21/2014
08/29/14	1214 hrs	Saucon Ave, Steel City	0.883	Broken Clouds	76.5°F	NW @ 4.0 mph	NW	Residence	Strong odor coming from IESI landfill	1226	1389	3215	10/21/2014
08/29/14	1217 hrs	Frite Ave, Steel City	0.950	Broken Clouds	77.2°F	N @ 3.5 mph	NW	Residence	Strong odor coming from IESI landfill	1220	1382	3202	10/21/2014
08/29/14	1800 hrs	Saucon Ave, Steel City	0.883	Broken Clouds	74.9°F	Calm - No Wind	NW	Residence	Gas Odors, again	1186	2064	3250	10/21/2014
08/29/14	1917 hrs	Quincy Ave, Steel City	0.827	Broken Clouds	76.1°F	Calm - No Wind	NW	Residence	Strong odor coming from IESI landfill	1261	2046	3307	10/21/2014
08/29/14	1881 hrs	Adams Ave, Steel City	0.923	Broken Clouds	82.6°F	Calm - No Wind	NW	Residence	Strong odor coming from IESI landfill	1197	2034	3231	10/21/2014
08/27/14	1957 hrs	Saucon Ave, Steel City	0.883	Broken Clouds	78.3°F	Calm - No Wind	NW	Residence	Strong Odors	1599	1537	3130	10/21/2014
08/27/14	1958 hrs	Frite Ave, Steel City	0.950	Broken Clouds	78.3°F	Calm - No Wind	NW	Residence	Strong Odors	1588	1526	3114	10/21/2014
08/27/14	2214 hrs	Frite Ave, Steel City	0.950	Broken Clouds	76.7°F	5 @ 1.2 mph	NW	Residence	Strong Odors	1564	1524	3088	10/21/2014
08/27/14	1527 hrs	Skyline Drive, Bethlehem	0.627	Broken Clouds	74.4°F	S @ 2.3 mph	W	Residence	Strong Odors	1312	2085	3397	10/21/2014
09/02/14	0724 hrs	Frite Ave, Steel City	0.950	Broken Clouds	71.1°F	Calm - No Wind	NW	Residence	Strong Odors entering home	1505	1512	3117	10/21/2014
09/08/14	1000 hrs	Skyline Drive, Bethlehem	0.627	Scattered Clouds	67.4°F	N @ 5.8 mph	W	Drive-by	Gas odor on Applebutter Rd	1403	1545	2548	10/21/2014
09/08/14	1100 hrs	Skyline Drive, Bethlehem	0.627	Scattered Clouds	70.1°F	NW @ 10.4 mph	W	Drive-by	Gas odor on Applebutter Rd	1414	1555	2969	10/21/2014
09/08/14	1649 hrs	Frite Ave, Steel City	0.950	Scattered Clouds	69.9°F	NW @ 3.0 mph	NW	Residence	Strong Odors	1426	1541	2967	10/21/2014
09/08/14	2130 hrs	Frite Ave, Steel City	0.950	Scattered Clouds	62.0°F	NNE @ 1.2 mph	NW	Residence	Strong Odors	1484	1495	3014	10/21/2014
09/09/14	1115 hrs	Skyline Drive, Bethlehem	0.627	Scattered Clouds	66.0°F	NW @ 6.0 mph	W	Drive-by	Gas odor on Applebutter Rd	1392	1532	2924	10/21/2014
09/10/14	0716 hrs	Frite Ave, Steel City	0.950	Scattered Clouds	62.6°F	NW @ 3.5 mph	NW	Drive-by	Foul odor smelled on the way to work	1433	1466	2979	10/21/2014
09/11/14	1617 hrs	Schwab Ave, Steel City	1.147	Scattered Clouds	79.8°F	SSE @ 6.0 mph	NW	Residence	Odor	1519	1482	2966	10/21/2014
09/11/14	2113 hrs	Saucon Ave, Steel City	0.883	Scattered Clouds	74.4°F	SW @ 4.6 mph	NW	Drive-by	Gas odors on Applebutter Rd & Shinersville Rd.	1484	1482	2966	10/21/2014
09/13/14	0755 hrs	Kitchline Rd, Hellertown	2.679	Weather Station Down			ESE	Residence	Gas odors on property	1760	1534	3294	10/21/2014
09/13/14	0821 hrs	Burnerut Rd, Hellertown	2.963	Weather Station Down			ESE	Residence	Garbage odors on property	1760	1537	3297	10/21/2014
09/13/14	1420 hrs	Frite Ave, Steel City	0.950	Scattered Clouds	66.4°F	N @ 3.5 mph	NW	Drive-by	Very strong odors on Rt 33 between Hellertown and Eaton Exte	1731	1584	3334	10/21/2014
09/13/14	1748 hrs	Saucon Ave, Steel City	0.883	Scattered Clouds	66.3°F	SW @ 3.5 mph	NW	Residence	Gas odor on property	1731	1584	3334	10/21/2014
09/24/14	1046 hrs	Saucon Ave, Steel City	0.883	Scattered Clouds	66.3°F	VW @ 5.8 mph	NW	Residence	Strong odor from IESI	1750	1495	3255	10/21/2014
09/30/14	0533 hrs	Mikell Ave, Steel City	0.796	Scattered Clouds	59.0°F	Calm - No Wind	NW	Residence	Strong odor from IESI	1750	1545	3295	10/21/2014
10/02/14	1609 hrs	Frite Ave, Steel City	0.950	Clear	67.9°F	Calm - No Wind	NW	Residence	Odors Detected in Most of Steel City	2111	2017	2689	10/21/2014
10/02/14	1811 hrs	Jefferson Ave, Steel City	0.741	Clear	64.7°F	Calm - No Wind	NW	Residence	Odors Detected in Most of Steel City	2111	2017	2689	10/21/2014
10/02/14	1836 hrs	Mikell Ave, Steel City	0.801	Clear	64.3°F	Calm - No Wind	NW	Residence	Odors Detected in Most of Steel City	2891	2691	2691	10/21/2014
10/02/14	1839 hrs	Johnson Ave, Steel City	0.883	Clear	64.3°F	Calm - No Wind	NW	Residence	Odors Detected in Most of Steel City	2702	2690	2690	10/21/2014
10/02/14	1847 hrs	Johnson Ave, Steel City	0.980	Clear	64.0°F	Calm - No Wind	NW	Residence	Odors Detected in Most of Steel City	2673	2673	2673	10/21/2014
10/02/14	1935 hrs	Johnson Ave, Steel City	1.083	Clear	63.9°F	Calm - No Wind	NW	Residence	Odors Detected in Most of Steel City	2673	2673	2673	10/21/2014
10/02/14	1933 hrs	Mikell Ave, Steel City	0.940	Clear	62.9°F	Calm - No Wind	NW	Residence	Odors Detected in Most of Steel City	2673	2673	2673	10/21/2014
10/06/14	0625 hrs	Frite Ave, Steel City	0.950	Clear	43.3°F	Calm - No Wind	NW	Residence	Strong odor from landfill	1750	1481	3231	10/21/2014

Case: IESI Routine Partial Insp 10/21/2014

Location: 2335 Applebutter Road

Municipality: Lower Saucon Township

County: Northampton County

Date / Time: 10/21/2014 / 1500 hrs

Photographer: Walter F. Govern III



New intermediate cover on the northern slope of Cell 4F. Photo looking east.



New intermediate cover on the northern slope of Cell 4F. Photo looking west.

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: ^{Tara} Walter F. ~~Groves III~~ + Rating Date: 10/21/2014
Weather Conditions: 53°F Mostly Sunny, Wind out of N @ 2 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
Shinersville Rd.	0910 hrs	N	N	-	eFACTS ID # 2314209
Saucon Ave	0911 hrs	N	N	-	
Roberts Ave	0912 hrs	N	N	-	
Mixsell Ave	0913 hrs	SL	P	O	Mushroom Soil - Earthy
Adams Ave	0915 hrs	N	N	-	
Riverside Ave	0919 hrs	SL	I	O	Scrap Yard debris
Redingtons Rj.	0924	N	N	-	
L. Saucon Rd	0928	SL	P	O	
Kings Mill Rd. (west)	0931	N	N	-	
Kings Mill Rd. (east)	0932	N	N	-	
Easton Ave (west)	0935	N	N	-	
Easton Ave (east)	0937	N	N	-	
Ringbaffer Rd.	0939	N	N	-	
Applebutter Rd.	0940	N	N	-	
Entrance DFEI landfil	0940	M	P	G/LFG	At gate
Applebutter Rd	0941	SLM	I/P	G/S	To End of Power Plant (Caprine) ^{Midwest Persistent sewage debris}
Skyline Dr. (East)	0947	SL	P	G	At Dead end of skyline Adjacent to Landfill
Skyline Dr. (west)	0950	PM	P	S	on skyline

Client#: 18927

IESI

ACORD™

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
12/17/2013

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER HUB International Ins Svcs Inc PO Box 90756 Albuquerque, NM 87199-0756 800-800-5661 / CA Lic# 0757776	CONTACT NAME: Margie Blackmon	FAX (A/C, No): 866-487-3972	
	PHONE (A/C, No, Ext): 505-828-4000	E-MAIL ADDRESS: margie.blackmon@hubinternational.com	
INSURED IESI Corporation and Its Subsidiaries 2301 Eagle Pkwy Ste 200 Fort Worth, TX 76177	INSURER(S) AFFORDING COVERAGE		NAIC #
	INSURER A: Greenwich Insurance Company	22322	
	INSURER B: Catlin Specialty Insurance Comp	15989	
	INSURER C: Liberty Insurance Underwriters	19917	
	INSURER D: Great American Assurance Compan	26344	
	INSURER E: Arch Insurance Company	11150	
INSURER F:			

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> Contractual Liability			GEC002511807	12/31/2013	12/31/2014	EACH OCCURRENCE \$1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$100,000 MED EXP (Any one person) \$5,000 PERSONAL & ADV INJURY \$1,000,000 GENERAL AGGREGATE \$2,000,000 PRODUCTS - COMP/OP AGG \$
E	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO ALL OWNED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> MCS-90 ENDT <input type="checkbox"/> SCHEDULED AUTOS NON-OWNED AUTOS			41CAB4928008	12/31/2013	12/31/2014	COMBINED SINGLE LIMIT (Ea accident) \$2,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
B	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> EXCESS LIAB			UMC936341214	12/31/2013	12/31/2014	EACH OCCURRENCE \$25,000,000
C	<input type="checkbox"/> CLAIMS-MADE			EXCSF1839429	12/31/2013	12/31/2014	AGGREGATE \$25,000,000
D	DED RETENTION \$			EXC4647724	12/31/2013	12/31/2014	\$
E	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		N/A	41WCI4927808 41WCI4927808 (NY)	12/31/2013	12/31/2014	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$1,000,000 E.L. DISEASE - EA EMPLOYEE \$1,000,000 E.L. DISEASE - POLICY LIMIT \$1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)
For informational purposes only

CERTIFICATE HOLDER

CANCELLATION

IESI BETHLEHAM PA
LANDFILL CORP 2335 APPLE BUTTER
ROAD
BETHLEHAM, PA 18015

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Robert H. Masbook

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Township Council
of Lower Saucon Township

Officials:
Ron Horisny, President
Tom Maxfield, Vice President
Priscilla deLeon
Glenn Kern
David Willard

RECEIVED

SEP 26 2014

BETHLEHEM DISTRICT OFFICE
PA DEP

September 24, 2014

Mr. Andrew F. Schweitzer, District Supervisor
Air Quality Program – PA Department of Environmental Protection
4530 Bath Pike
Bethlehem, PA 18017-9074

Re: Landfill Gases and Malodor – IESI PA Bethlehem Landfill – ID No. 10020

Dear Mr. Schweitzer:

Thank you for meeting with the Township officials on June 24, 2014 and providing inspections for the landfill gases both on the landfill site and offsite over the last few months.

Based upon the identification of offsite landfill odors, experienced by area residents and confirmed by the DEP "Emergency Response Field Inspection Report," dated August 23, 2014, the Township Council, at their regular meeting of September 17, 2014, voted to request that the Department undertake a program of ambient air quality sampling and testing to identify the level and frequency of landfill gases that are impacting residential areas; specifically identifying the components of landfill gases that are harmful to health.

Please let me know if the Township can help with any local coordination regarding the placement and protection of the sampling equipment.

Sincerely,


Jack Cahalan
Township Manager

JC/llh

cc: Council

Mr. Allen Schleyer, IESI compliance Manager

Govern, Walter

From: Allen Schleyer <aschleyer@iesi.com>
Sent: Wednesday, October 01, 2014 11:41 AM
To: Schweitzer, Andrew; Redding, Tara; Govern, Walter
Cc: 'Ken Minton'
Subject: Bethlehem-BRE SSM Summary

The following is an update to the BRE Gas Turbine Generator / IESI Flare activity.

We had the following LFG Flare and BRE turbine shut downs at Bethlehem Landfill. Auto-valves closed as designed for each shutdown of the flare or turbine.

No odors were noted or odor complaints received by Bethlehem Landfill during the outage events. BRE is currently operating as the primary GCCS with the landfill flare as back-up.

July 31, 2014	Turbine shutdown	11:04	Maintenance
Aug 1, 2014	Flare shutdown	10:18	To start turbine
	Turbine startup	12:24	Duration 2 hr 6 min
	Flare startup	13:44	Duration 2 hr 6 min then turbine running
Aug 4, 2014	Turbine shutdown	19:20	Protective Shutdown
	Flare shutdown	23:40	To start turbine
Aug 5, 2014	Turbine startup	01:10	Duration 1 hr 30 min
	Flare startup	01:46	Duration 1 hr 30 min turbine running
	Turbine shutdown	07:04	Protective shutdown
	Flare shutdown	07:47	To start turbine
	Turbine startup	07:52	Duration 5 min
	Flare startup	10:05	Duration 5 min then turbine running
Aug 13, 2014	Turbine shutdown	09:07	Protective shutdown
	Turbine startup	09:21	Flare running
Aug 21, 2014	Turbine shutdown	10:58	Protective shutdown
	Turbine startup	11:39	Flare running
Aug 29, 2014	Turbine shutdown	08:37	Maintenance
	Flare shutdown	19:07	To start turbine
	Turbine startup	20:20	Duration 1 hr 14 min
	Flare startup	21:26	Duration 1 hr 14 min turbine running

Documentation is on file.

Al Schleyer

Compliance Manager

IESI

A Progressive Waste Solutions Company

T: 610-317-3200 Bethlehem

T: 717-709-1700 Blue Ridge

C: 484-357-3135

IESI PA Blue Ridge Landfill

PO Box 399

Scotland, PA 17254

IESI PA Bethlehem Landfill
2335 Apple Butter Road
Bethlehem, PA 18015

www.iesi.com

Govern, Walter

From: Allen Schleyer <aschleyer@iesi.com>
Sent: Friday, October 03, 2014 11:34 AM
To: Fisher, Dean J; Sam Donato
Cc: Govern, Walter; pdeleon@lowersaucontownship.org; Tom Maxfield; manager@lowersaucontownship.org; 'Chris Taylor' (ctaylor@hanovereng.com)
Subject: RE: Emergency Response TEam - Odor Investigation

Dean

BRE was shut down for some plc control work, the Flare was operating avg 2,700 +/- 50 scfm throughout the shutdown. I'll check with the lfg gas construction crew to see what else was going on.

From: Fisher, Dean J [<mailto:defisher@pa.gov>]
Sent: Friday, October 03, 2014 9:25 AM
To: Sam Donato; Allen Schleyer
Cc: Govern, Walter; pdeleon@lowersaucontownship.org; Tom Maxfield; manager@lowersaucontownship.org; 'Chris Taylor' (ctaylor@hanovereng.com)
Subject: Emergency Response TEam - Odor Investigation

Sam/Al:

Late last night the Department's ER Team responded to odor complaints in Steel City. There were seven (7) calls.

I do not yet have the full report. However, it is my understanding that no odors were detected or confirmed with any of the complainant's.

A light LFG odor was persistent at the Hill Climb. The sewer plant was allegedly very strong last evening. The sewer plant odor dissipated upon entering Steel City.

Multiple complainant's were interviewed. LFG odors were allegedly very strong from 4:30 pm until 7:30 pm.

Any problems with gas collection at the landfill late yesterday? Wally will be following up during the next inspection.

Dean

Dean J. Fisher | Solid Waste District Supervisor
Department of Environmental Protection
Waste Management Program | Operations Compliance Enforcement
Bethlehem District Office – Carbon, Lehigh, Monroe & Northampton Counties
4530 Bath Pike | Bethlehem, PA 18017-9074
Phone: 610.861.2063 | Fax: 610.861.2072
www.dep.state.pa.us

Govern, Walter

From: Allen Schleyer <aschleyer@iesi.com>
Sent: Friday, October 03, 2014 2:56 PM
To: Fisher, Dean J; Sam Donato
Cc: Govern, Walter; pdeleon@lowersaucontownship.org; Tom Maxfield; manager@lowersaucontownship.org; 'Chris Taylor' (ctaylor@hanovereng.com)
Subject: RE: Emergency Response TEam - Odor Investigation

Dean

As a follow-up; The gas crew was only welding pipe yesterday and did not have any excavation or drilling.

Our landfill crew did reshape a bench and slope on the SW corner of the fill area, but that was completed and covered by 3:00pm.

The rest was routine disposal.

Al Schleyer

From: Fisher, Dean J [<mailto:defisher@pa.gov>]
Sent: Friday, October 03, 2014 9:25 AM
To: Sam Donato; Allen Schleyer
Cc: Govern, Walter; pdeleon@lowersaucontownship.org; Tom Maxfield; manager@lowersaucontownship.org; 'Chris Taylor' (ctaylor@hanovereng.com)
Subject: Emergency Response TEam - Odor Investigation

Sam/Al:

Late last night the Department's ER Team responded to odor complaints in Steel City. There were seven (7) calls.

I do not yet have the full report. However, it is my understanding that no odors were detected or confirmed with any of the complainant's.

A light LFG odor was persistent at the Hill Climb. The sewer plant was allegedly very strong last evening. The sewer plant odor dissipated upon entering Steel City.

Multiple complainant's were interviewed. LFG odors were allegedly very strong from 4:30 pm until 7:30 pm.

Any problems with gas collection at the landfill late yesterday? Wally will be following up during the next inspection.

Dean

Dean J. Fisher | Solid Waste District Supervisor
Department of Environmental Protection
Waste Management Program | Operations Compliance Enforcement
Bethlehem District Office – Carbon, Lehigh, Monroe & Northampton Counties
4530 Bath Pike | Bethlehem, PA 18017-9074
Phone: 610.861.2063 | Fax: 610.861.2072
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Govern, Walter

From: Priscilla deLeon <pdeleon@lowersaucontownship.org>
Sent: Saturday, October 04, 2014 9:57 AM
To: Fisher, Dean J; Sam Donato - IESI; Allen Schleyer - IESI
Cc: Govern, Walter; Jack Cahalan; 'Chris Taylor' (ctaylor@hanovereng.com); ; dlouder2013@gmail.com; thehijazis@hotmail.com; rsichler@msn.com; lmcnemarpe@verizon.net; jbirdsall@hanovereng.com
Subject: Police report 10/2/2014 Steel City residence - gas odor
Attachments: 2014 10-2 police report LFG steel city residence 201410031328.pdf

Hi Dean,
thank you for the email. Attached is a copy of the police report from that night.

*Priscilla deLeon, Councilwoman,
Lower Saucon Township
Cell 610-216-0566*

From: Fisher, Dean J [defisher@pa.gov]
Sent: Friday, October 03, 2014 9:24 AM
To: Sam Donato - IESI; Allen Schleyer - IESI
Cc: Govern, Walter; Priscilla deLeon; Tom Maxfield; Jack Cahalan; 'Chris Taylor' (ctaylor@hanovereng.com)
Subject: Emergency Response TEam - Odor Investigation

Sam/Al:

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Incident Report



LOWER SAUCON TOWNSHIP POLICE DEPARTMENT
3700 OLD PHILADELPHIA PIKE
BETHLEHEM, PA 18015

Phone: (610)317-6110 Fax: (610)694-9609

	Municipality Report Type	LOWER SAUCON TWP (210) INCIDENT
Incident #	Reference #	Location
20141002M4049	3337	4290 ADAMS AVE - BETHLEHEM
		Landmark
		Premise
		Point of Entry
		Meth. of Entry
		Patrol Zone
		Grid
		Reported
		10/02/2014 @ 18:18 (Thur)
		Discovered
		@
		Last Secure
		@
		Received
		Dispatched 18:18
		Arrived
		18:28 Cleared 18:42
		Status
		CLOSED/CLEARED
		Disposition
		CLOSED - NO FURTHER ACTION
		Clear Date
		10/02/2014
		Badge
		180 - PTL ERIC MARTH

	Title :	
Criminal Code	Section :	
	Sub-Section :	
	Description :	

UCR Codes	7502 ASSIST OTHER AGENCIES - FIRE DEPT.
-----------	---

Investigating Officer _____	Approving Officer _____
Signature	Signature
Date	Date



Persons Involved

BRUNEO, CINDY		Arrest Date :	Disposition Date :
Role COMPLAINANT	Incident Classification 7502 ASSIST OTHER AGENCIES - FIRE DEPT.	How Charged	Disposition

Alias
Age-DOB 41 - 06/19/1973 Height
Race WHITE Weight 0 Home Addr 4290 ADAMS AVE
Sex FEMALE Hair BETHLEHEM, PA 18015
Ethnicity NON-HISPANIC Eyes
Marital Stat MARRIED Build Home Ph # (610)317-6341
Residency Resident Complex. Work Ph #
SSN Cell Ph #
Gang Other Ph # No Photo
Tattoo E-Mail
Clothing Employer
GBM Id
-Entered // Occupation
-Released // Addl Addr None
OLN/State 23059757/PA
Injury

Main Narrative

PTL ERIC MARTH (180)

10/02/2014 21:21 - 180 PTL ERIC MARTH c2
Dispatched along with Steel City FD to said address for a complaint of the odor of methane gas in the area. Upon arrival, a slight unpleasant odor could be detected in the air and was determined to be originating from the Landfill as usual. Comp Bruneo stated that the odor was stronger approx. an hour earlier and that she called the DEP complaint line and received the answering service approx. five minutes before calling NC-911. Fire units cleared and I advised Bruneo that a report would be completed documenting her complaint. Comp was appreciative of the response. Nothing further.

Supplemental Narrative

POLICE CLERK JULIE (CLRK)

SUPPLEMENTAL 10/03/2014 08:46:58 - CLRK POLICE CLERK - JULIE
Incident given to the township.



Govern, Walter

From: Allen Schleyer <aschleyer@iesi.com>
Sent: Tuesday, October 21, 2014 1:05 PM
To: Schweitzer, Andrew; Redding, Tara
Cc: Govern, Walter
Subject: Bethlehem SSM summary

The following is an update to the BRE Gas Turbine Generator / IESI Flare activity.

We had the following LFG Flare and BRE turbine shut downs at Bethlehem Landfill. Auto-valves closed as designed for each shutdown of the flare or turbine.

No odors were noted or odor complaints received by Bethlehem Landfill during the outage events. BRE is currently operating as the primary GCCS with the landfill flare as back-up.

Sept 2, 2014	Turbine shutdown	10:12	Maintenance
	Flare shutdown	13:52	To start turbine
	Turbine startup	14:35	Duration 43 min
	Flare startup	15:22	Duration 43 min then turbine running
	Flare shutdown	15:37	Hi temp
	Flare startup	16:43	Turbine running
Sept 5, 2014	Turbine shutdown	14:30	Maintenance
	Turbine startup	14:50	Flare running
Sept 9, 2014	Flare shutdown	14:57	switch blower
	Flare startup	15:05	Turbine running
Sept 12, 2014	Turbine shutdown	19:50	Maintenance
	Turbine startup	21:00	Flare running
	Flare shutdown	21:12	To start turbine
	Flare startup	21:57	turbine running
Sept 15, 2014	Turbine shutdown	05:16	Protective shutdown
	Flare shutdown	22:59	To start turbine
Sept 16, 2014	Turbine startup	00:01	Duration 1 hr 2 min
	Flare startup	01:32	Duration 1 hr 2 min then turbine running
Sept 17, 2014	Turbine shutdown	23:15	Loss of power
	Flare shutdown	23:28	Loss of power
	Flare startup	23:41	Duration 13 min
Sept 18, 2014	Flare shutdown	02:10	Start turbine
	Turbine startup	02:52	Duration 42 min
	Flare startup	04:27	Duration 42 min turbine running
Sept 22, 2014	Flare shutdown	10:20	well field construction
	Flare startup	15:00	Turbine running
Sept 23, 2014	Flare shutdown	08:41	well field construction
	Flare startup	13:00	turbine running
Sept 26, 2014	Turbine shutdown	09:33	Maintenance
Sept 26, 2014	Flare shutdown	10:39	Maintenance
	Flare startup	11:52	Duration 1 hr 13 min
	Flare shutdown	13:22	Maintenance
	Flare startup	14:23	Duration 1 hr 1 min
	Flare shutdown	15:24	Maintenance
	Flare startup	15:42	Duration 18 min

Sept 27, 2014

Flare shutdown	22:34	Start turbine
Turbine startup	23:56	Duration 3 hr 50 min flare downtime
Flare startup	00:32	Duration

Documentation is on file.

Al Schleyer

Compliance Manager

IESI

A Progressive Waste Solutions Company

T: 610-317-3200 Bethlehem

T: 717-709-1700 Blue Ridge

C: 484-357-3135

IESI PA Blue Ridge Landfill

PO Box 399

Scotland, PA 17254

IESI PA Bethlehem Landfill

2335 Apple Butter Road

Bethlehem, PA 18015

www.iesi.com

Govern, Walter

From: Allen Schleyer <aschleyer@iesi.com>
Sent: Wednesday, October 22, 2014 10:26 AM
To: Govern, Walter
Subject: RE: Odor complaints for Follow-up
Attachments: IESI Odor Compl Spreadsheet for AI for followup.xlsx

Wally

Attached is the requested information for the flare and BRE operations. Also for reference, the BRE plant was down from approx. 01:00 am 10-1-14 through 13:06 pm 10-3-14.

Best of luck on your new career... keep in touch.

AI

From: Govern, Walter [<mailto:wgovern@pa.gov>]
Sent: Thursday, October 16, 2014 11:28 AM
To: Allen Schleyer
Subject: Odor complaints for Follow-up

Hey AI,

I will be doing an inspection at IESI this month (October).
Here's the complaints for gas data follow-up.

Don't be alarmed as there are a number of complaints that need to be addressed from prior to the 8/27/14 insp. I will explain during the inspection. Please begin collecting data ASAP so we can get this report done by the and routed by the end of October.

Thank you, your work and help is greatly appreciated!

Walter F. Govern III | Solid Waste Specialist
Department of Environmental Protection | Waste Management
Bethlehem District Office
4530 Bath Pike | Bethlehem, PA 18017-9074
Phone: 610.861.2136 | Fax: 610.861.2072
www.dep.state.pa.us

Govern, Walter

From: Allen Schleyer <aschleyer@iesi.com>
Sent: Wednesday, October 22, 2014 12:19 PM
To: Govern, Walter; Redding, Tara
Subject: RE: Insurance
Attachments: Beth LFG System Update 2014.pdf

Wally, Tara;

Attached is a pdf of the updated Bethlehem LFG Well Drawing.

Highlighted wells are the ones recently constructed. We did construct 16 vertical wells and one horizontal collector located on the west side of Cell 4-E stage 1.

Al

-----Original Message-----

From: Govern, Walter [<mailto:wgovern@pa.gov>]
Sent: Tuesday, October 21, 2014 2:30 PM
To: Allen Schleyer
Subject: RE: Insurance

No problem.

Thanks!

Walter F. Govern III | Solid Waste Specialist Department of Environmental Protection | Waste Management Bethlehem District Office
4530 Bath Pike | Bethlehem, PA 18017-9074
Phone: 610.861.2136 | Fax: 610.861.2072
www.dep.state.pa.us

-----Original Message-----

From: Allen Schleyer [<mailto:aschleyer@iesi.com>]
Sent: Tuesday, October 21, 2014 2:29 PM
To: Govern, Walter
Subject: Insurance

Wally

See attached insurance document. I will have to forward the odor report tomorrow morning. I have an appointment to go to.

Al

-----Original Message-----

From: scanner@progressivewaste.com [<mailto:scanner@progressivewaste.com>]
Sent: Tuesday, October 21, 2014 9:49 AM
To: Allen Schleyer

Subject: Scan from a Xerox WorkCentre

Number of Images: 1

Attachment File Type: PDF

Device Name: BethXerox

The Following Odor Patrol Logs

Are General Odor Patrols

Not Associated with an IESI Inspection

(General Odor Patrols are Conducted as Time Permits)

Investigator: Tara Redding Date: 9/18/14 CASE: 40 Complaint 30 7597
 Weather Conditions: clear, 50-70°F, wind pred N/W ODOR PATROL SURVEY

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
Washington St.	9:17	SL	P	O	mixture of burning and gas-like smell.
Applebutter Rd.	9:20	SL	I	O	indeterminant, possible LFG-like - near street with
Applebutter Rd.	9:23	M	P	G	working fire like odor - heading east
Valley Views Rd.	9:28	N			garbage bins at driveways
Hexenkopf Rd.	9:31	N			
Raichsille / Easton Rd	9:34	SL	I	G/LFG/D	near end of Hexenkopf - very slight mostly garbage
Louise Saucen Rd	9:37	N			garbage bins/recycle bins at driveways
Kichline Dr.	9:39	N			
Butternut Rd.	9:40	N			Some garbage/recycling bins at driveways
Kichline Dr.	9:48	SL	I	LFG-like	extremely faint, very short (color ascends) LFG - also
Hexenkopf Rd.	10:00	N			also slightly odor
Raichsille/Hexenkopf Rd.	10:09	SL	I	G/LFG/O	near end of Hexenkopf Rd. - slight - mostly garbage-like
Easton Rd	10:10	SL	I	G/D	slight, mostly garbage-like (heading west)
Easton Rd.	10:15	N			heading east + back to Kingshuff - again
Ringhofer Rd.	10:25	SL	I	LFG-like	closer to Easton Rd. / not near Applebutter end.
Applebutter Rd.	10:30	SL-M	P	G	working fire from BEST entrance/BRE to driveway
Koberitz Ave.	10:33	N			appears to be truck collection day for curbside
Mixell Ave.	10:40	N			mowing

