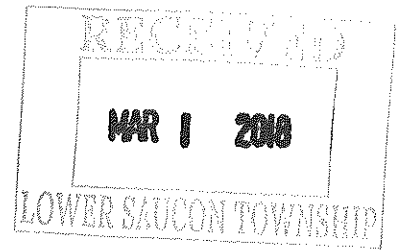




**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

BETHLEHEM DISTRICT OFFICE



February 27, 2018

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

Attention: Ms. Leslie Huhn

Re: IESI PA Bethlehem Landfill  
TV 48-00027  
Lower Saucon Township, Northampton County

Dear Ms. Huhn:

Please find enclosed a copy of the report of the 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 610-861-2070.

Sincerely,

Jessica Wagoner  
Air Quality Specialist  
Air Quality Program

Enclosure

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

4530 Bath Pike | Bethlehem, PA 18017



# INSPECTION REPORT

Commonwealth of Pennsylvania  
Department of Environmental Protection  
Air Quality Program

Date(s) of Inspection: <b>2/13/18</b>	TV <input checked="" type="checkbox"/> SM <input type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): <b>48-00027</b>	Expiration Date: <b>4/12/18</b>	Case #: _____	PF ID #: <b>549728</b>
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Company Name: <b>IESI PA Bethlehem Landfill</b>	Municipality: <b>Lower Saucon Township</b>	County: <b>Northampton</b>
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Plant Name:- _____	Physical Location: <b>Same as mailing address</b>	Federal ID -- Plant Code #: <b>22-3575227-1</b>
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Responsible Official: <b>Donald Hallock</b>	Mailing Address: <b>2335 Applebutter Road</b>
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Title: <b>District General Manager</b>	Bethlehem, PA 18015
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Phone #(s): <b>518-783-2827</b>	
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**Mark (X) All Inspection Types That Apply To This Inspection:**

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

Annual Compliance Certification Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: 1/30/18
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AIMS Report Received: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	Date Received: 2/28/17 -2017 AIMS due 3/1/18
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**Mark (X) All Activities That Apply:**

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

On February 13, 2018, this inspector conducted a full compliance evaluation (FCE) at IESI PA Bethlehem Landfill (IESI). Ms. Amy Faulch and Ms. Teresa Sirnic, Waste Management Program, were also present on behalf of the Department. Mr. Nick Rogers provided a site tour and was interviewed on behalf of IESI.

IESI operates a landfill under TV permit #48-00027 and Plan Approval 48-00027A which covers the following sources: 001 Landfill Operations, 002 Landfill Surface and Roadways, 004 Leachate Storage, 008 Cat Engine, and 755884 Portable Crushing Operations.

The Cat Engine and Portable Crusher have not been used since the last FCE. IESI plans to submit a Plan Approval application for future use of a crusher onsite. There is no leachate in storage.

IESI is preparing Request for Determinations (RFD's) for a truck tipper with engine and a portable odor neutralizer unit.

Prior to entering the landfill an odor patrol was conducted in the areas surrounding the landfill. No landfill related odors were detected at this time. A copy of the odor patrol log is attached.

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report	Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Company Representative: 	Title: <b>District General Manager</b>	Signature: 	Date: <b>2/15/18</b>
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DEP Representative: <b>Jessica Wagoner</b>	Title: <b>AQS</b>	Signature: 	Date/Time: <b>2/15/18</b>
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This document is official notification that a representative of the Department of Environmental Protection Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming if such violations are noted.



# INSPECTION REPORT

Continued

Commonwealth of Pennsylvania  
Department of Environmental Protection  
Air Quality Program

During the site tour it was noted that the working face was in Cell 4B. Trucks were observed dumping at this time. Working face odors were detected in the immediate area of the working face. Mistifiers are not currently in use due to low temperatures. The flare was operating at 1646°F and 2425scfm. BRE was receiving ~1000scfm. Surface monitoring was conducted on the south slope of the landfill and in the temporary cap area. No exceedances were noted.

While conducting the odor patrol, black smoke and flames were observed coming from the flare, it lasted for approximately 30 seconds. Upon entering the landfill this inspector inquired about the observations. Mr. Rogers stated that BRE was conducting maintenance and if a compressor went down, more gas would be sent to the flare, and the flare louvers take a moment to adjust the air flow in the flare, causing the smoke and flames. Mr. Rogers also stated that in addition to this event, these conditions could occur during startups of the flare. During the inspection the circular chart was reviewed and showed a brief increase in LFG and temperature.

TV Permit 48-00027, Section E, Group 1, Condition 1 states no flare shall produce visible flame or emissions, except for periods not to exceed 5 minutes in any 2 consecutive hours. Emissions during the periods shall not exceed 10% opacity. In addition, IESI is to comply with the visible emission requirements of 25 Pa Code 123.41.

The flames and black smoke did not exceed 5 minutes. Opacity was not determined as this inspector was driving at the time. IESI is reminded that if the visible emissions from the flare exceed the permit requirements or 25 PA Code 123.41 that the event should be reported as a malfunction and logged in the semiannual deviation report.

No fugitive or malodor emissions were noted at the time of the inspection.

#### Records Review:

Asbestos Disposal Records- Reviewed and appear complete.

Flare Chart Records- Reviewed and flare appears to be operated >1600°F

Flare Calibration/Maintenance Records- Records maintained.

Monthly Wellhead Monitoring (Pressure, Temperature, Oxygen)- Monthly records reviewed from last FCE to present and appear complete.

Waste-in- Place- 7,006,548 tons as of 2016 (SCS is preparing this record)

Monthly Cover inspections- Conducted monthly

Road Treatment Logs- Reviewed and appear complete.

Weekly site inspections- Reviewed and appear complete.

Neutralizer Logs (Usage and Hours of Operation)- records reviewed and appear complete. 1155 gallons used from July 2017 to present.

Monthly LFG Flow- reviewed in quarterly LFG collection efficiency reports.

Estimated LFG generation- SCS is preparing this record.

SSM Plan and reports- SSM submitted to Department and maintained onsite. Plan and records reviewed onsite.

Odor Patrol Logs- Reviewed since last FCE.

Water Truck records- reviewed since last FCE and appear complete.

Monthly dust control inspection and sweeper log- reviewed since last FCE and appear complete.

#### Reports Submitted since last FCE:

2016 Compliance Cert- Received 1/30/18

LFG Collection Efficiency Reports- 2Q2017 (rec'd 7/12/17), 3Q2017 (rec'd 10/9/17), 4Q2017 (rec'd 1/3/18)

2016 AIMS- Received 2/28/17, 2017 AIMS due by 3/1/18

Semiannual NSPS and NEHSAP reports- 1<sup>st</sup> Half 2017 (rec'd 7/28/17), 2<sup>nd</sup> Half 2017 (rec'd 1/30/18)

Odor Complaint: The Department received an odor complaint on 1/25/18. An odor patrol was conducted on 1/26/18, no landfill related odors were detected at that time. Mr. Rogers provided LFG data for the time of the complaint. This concludes this complaint investigation as no AQ violations were noted.

This concludes this inspection as no air quality violations were noted.

Due to time constraints, this report was not issued at the time of the inspection.

Company - plant name:  
IESI PA Bethlehem Landfill

Initials of representative interviewed:

Date:  
2/15/18

Surface Methane Monitoring  
Calibration Form



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DEPARTMENT OF ENVIRONMENTAL PROTECTION

Site: IES1

Date: 2/13/18

Model: TVA-1000A

Serial #: 660688

Weather: 23°F 64% Humidity  
Sunny

Wind: NNE @ 5MPH

Zero Accepted (Y/N): Yes

Span Accepted (Y/N): Yes

Response Time (450 ppm)

T<sub>1</sub>: 4.24 sec

T<sub>2</sub>: 4.09 sec

T<sub>3</sub>: 3.67 sec

Avg Response: 4 sec

Ok if response is <30 sec

Calibration Precision (500 ppm)

R<sub>1</sub>: 500 ppm

R<sub>2</sub>: 498 ppm

R<sub>3</sub>: 499 ppm

$$\frac{|500-R_1| + |500-R_2| + |500-R_3|}{3(500)} \times 100 = \underline{0.2}\%$$

Ok if deviation is <10%

Calibrated by: [Signature]

Surface Methane Monitoring  
Field Sheet



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DEPARTMENT OF ENVIRONMENTAL PROTECTION

<b>Landfill</b>	IESI	<b>Inspection Date</b>	2/13/18
<b>Specialist</b>	J. Wagoner	<b>Date Instrument was last calibrated</b>	2/13/18
<b>Background Location (Upwind of Facility)</b>	BDO	<b>Background Value (FID Reading ppm)</b>	1.38 BDO

Time	Location	FID Reading ppm	Comment
10:44	EW4-58	3.87	
10:47	EW4-53	8.04	
10:49	EW4-26	2.05	
10:49	EW4-26-R	3.69	
10:51	EW420-R	3.41	
10:54	TC-08	1.35	
10:55	EW410-R	1.28	
10:55	HW4-15	1.36	
10:58	HW <sup>TH</sup> EW4-1A	3.14	
11:00	EW4-44	2.80	
11:02	EW40	1.32	
11:03	4-27R	1.74	
11:04	EW4-19	1.71	
11:08	EW4-43	7.51	

Surface Methane Monitoring  
Field Sheet



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DEPARTMENT OF ENVIRONMENTAL PROTECTION

<b>Landfill</b>		<b>Inspection Date</b>	2/13/18
<b>Specialist</b>	<i>see page 1</i>	<b>Date Instrument was last calibrated</b>	
<b>Background Location (Upwind of Facility)</b>		<b>Background Value (FID Reading ppm)</b>	

Time	Location	FID Reading ppm	Comment
11:09	Flange pipe SW	5.59	
11:11	EW 4-52	1.67	
11:13	EW 449	2.85	
11:14	TC 02	2.94	
11:15	<del>LC17</del> LC17	3.71	
11:16	HW 4-17	4.88	
11:16	EW 450	3.25	
11:19	EW 4-30R	2.69	
11:21	EW 416	1.54	
11:23	HW 4-31	15.81	
11:24	EW 4-11	1.28	
11:25	EW 4-11R	1.30	
11:26	301A	1.21	
11:28	EW 303	1.35	

Surface Methane Monitoring  
Field Sheet



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DEPARTMENT OF ENVIRONMENTAL PROTECTION

<b>Landfill</b>		<b>Inspection Date</b>	2/13/18
<b>Specialist</b>	<i>see page 1</i>	<b>Date Instrument was last calibrated</b>	
<b>Background Location (Upwind of Facility)</b>		<b>Background Value (FID Reading ppm)</b>	

Time	Location	FID Reading ppm	Comment
11:29	EW 3-05	1.22	
11:35	HW 3-1	1.20	
11:36	In between	1.15	
11:37	In between	1.20	
11:38	SW 03	1.44	
11:42	HW 4-2	1.42	

IESI PA BETHLEHEM LANDFILL  
ODOR PATROL SURVEY

Investigator: A. Feulich/S. Wagner / T. Strubbe Date: 2/13/18  
Weather Conditions: Clear 30°F, wind 0

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.	910	SL	1	S	very light sewage odor near Sew. Tr. Pit.
Sawcon Ave	912	SL	1	O	very light wood burning odor
Roberts	914	N			
Snyder	915	N			
Myxell	916	N			
Adams	916	SL	1	O	light wood burning odor
Johnston	917	N			
Jefferson	917	N			
Riverside	918	N			
Fritz	918	N			
Johnston	919	N			
Snyder	920	N			
Schwab	920	N			
Matthews	921	N			
Riverside	922	N			
Bedington	927	N			
Lwn Sawcon Rd	930	N			
Applebutter	931	N			



**IESI PA BETHLEHEM LANDFILL  
ODOR PATROL SURVEY**

Investigator: A. Feuch / J. Wagner / I. Sirmic Date: 2/13/18  
 Weather Conditions: Clear, 30°F, wind 0

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
Stony Hill	932				
Reynhoffer	937				
Applebutter	939	SL	1	O	light "burning" odor
ENTER LANDFILL	940				