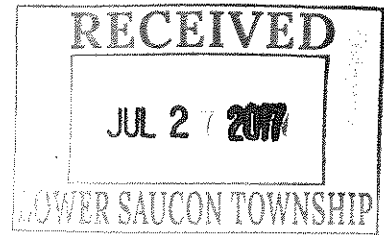




pennsylvania

DEPARTMENT OF ENVIRONMENTAL
PROTECTION

BETHLEHEM DISTRICT OFFICE



July 14, 2017

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

Date(s) of Inspection: **6/28/17** TV SM NM PA GP MEGA Permit #(s): **48-00027** Expiration Date: **4/12/18** Case #: _____ PF ID #: **549728**

Company Name: **IESI PA Bethlehem Landfill** Municipality: **Lower Saucon Township** County: **Northampton**

Plant Name: _____ Physical Location: **Same as mailing address** Federal ID — Plant Code #: **22-3575227-1**

Responsible Official: **Donald Hallock** Mailing Address: **2335 Applebutter Road**

Title: **District General Manager** **Bethlehem, PA 18015**

Phone #(s): **518-783-2827**

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: YES NO N/A Date Received: **3/1/17**

AIMS Report Received: YES NO N/A Date Received: **2/28/17**

Mark (X) All Activities That Apply: Arrival: 13:15 hours Exit: 16:00 hours

- | | | |
|---|---|---|
| <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 June 28, 2017, this inspector conducted a full compliance evaluation (FCE) at IESI PA Bethlehem Landfill (IESI). Ms. Amy Faulch and Ms. Jen Cimera, Waste Management Program, were also present on behalf of the Department. Mr. Nick Rogers, Mr. Don Hallock, and Mr. David George (SCS Field Services) were interviewed on behalf of IESI.

IESI operates a landfill under TV permit #48-00027 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. There is no leachate in storage.

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.

The landfill's monthly gas meeting was also being held on this date and was attended. The landfill meets with SCS Field Services staff and reviews landfill gas (LFG) data and system information at these meetings.

Compliance Status: In Out Pending Awaiting Co. Report Needs a Follow-Up Inspection? Yes No

Company Representative: **Donald Hallock** Title: **manager** Signature: _____ Date: **7/13/17**

DEP Representative: **Jessica Wagoner** Title: **AQS** Signature: _____ Date/Time: **7/13/17**

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 located in Cell 4E/4F. Trucks were observed dumping at this time. Working face odors were detected in the immediate area of the working face. The misters were observed in operation. IESI is currently using a lemon scented neutralizer.

The flare was operating at 1640°F and 1086scfm. BRE was receiving 2110scfm. The LFG quality was 50.5% methane and 0.4% oxygen.

Surface monitoring was conducted on the top of the landfill and in the temporary cap area. Three exceedances (>500ppm methane) were noted, see the attached log. IESI was notified of the exceedances during the 7/5/17 site visit and has 10-days from that date to make repairs and re-monitor. Also during surface monitoring the FLIR (thermal imaging infrared camera) was used to observe wells. The FLIR was also used to observe wells on 7/5/17.

No fugitive, visible, 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- Calibrated 11/14/16

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

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. 660 gallons (Neutralizer diluted with water) have been used since April 2017. The northern mister came online 4/3/17 and the southern mister came online 4/24/17.

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

Estimated LFG generation- 2561.3 cfm

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 Jan-May 2017.

The Department has been reviewing IESI's quarterly SEM procedures and reports for 3Q 2016, 4Q 2016, 1Q 2017, and 2Q 2017 to determine if IESI is following the December 2015 Gas Collection and Control Design (GCCD) Plan, and 40 CFR Part 60 Subpart WWW and Section 4.3.1 of Method 21 of Appendix A of this part. After reviewing reports and landfill operations data for these times it appears IESI is following the GCCD Plan and Subpart WWW.

Reports Submitted since last FCE:

2016 Compliance Cert- Received 3/1/17

LFG Collection Efficiency Reports- 1Q 2016 (Rec'd 5/2/16), 2Q 2016 (Rec'd 7/14/17), 3Q 2016 (Rec'd 10/20/16), 4Q 2016 (Rec'd 1/13/17), 2017 1Q (Rec'd 4/11/17)

2016 AIMS- Received 2/28/17

Semiannual NSPS and NEHSAP reports- 2nd Half 2016 received.

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:

D. H. H. H.

Date:

7/13/17

Surface Methane Monitoring
Calibration Form



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DEPARTMENT OF ENVIRONMENTAL PROTECTION

Site: IES1

Date: 10/28/2017

Model: TVA-1000

Serial #: 40/49883

Weather: Clear, 100°F, 60% humidity

Wind: NNE @ 1 mph

*Calibrated in DEP NERO @ 8:10 am

Zero Accepted (Y/N): Y

Span Accepted (Y/N): Y

Response Time (450 ppm)

T₁: 3.60 sec

T₂: 3.24 sec

T₃: 3.15 sec

Avg Response: 3.33 sec

Ok if response is <30 sec

Calibration Precision (500 ppm)

R₁: 501 ppm

R₂: 500 ppm

R₃: 496 ppm

$$\frac{|500-R_1| + |500-R_2| + |500-R_3|}{3(500)} \times 100 = \underline{.33} \%$$

Ok if deviation is <10%

Calibrated by: Michelle Kirk

Surface Methane Monitoring
Field Sheet



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DEPARTMENT OF ENVIRONMENTAL PROTECTION

Landfill	IESI	Inspection Date	6/28/17
Specialist	J. Wagoner	Date Instrument was last calibrated	6/28/17
Background Location (Upwind of Facility)		Background Value (FID Reading ppm)	

Time	Location	FID Reading ppm	Comment
1334	EW 421 R	3.28	
1336	EW 4-36R	3.98	
1338	EW 4-42R	3.09	
1339	EW 4-56	6.66	
1341	EW 4-55	1,023.0 10,023.0 AR	
1347	EW 4-34	9,000 +	
1353	EW 4-54	35.43	
1355	EW 4-48	26.16	
13:57	HW 4-8	5.80	
13:59	EW- 4-40	2.10	
14:00	HW - 4-5	2.92	
14:00	HW 4-9	2.24	
1401	HW 4-50	2.10	
1403	EW 438	15.71	

Surface Methane Monitoring
Field Sheet



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Landfill	IESI	Inspection Date	6/28/2017
Specialist	J Wagoner	Date Instrument was last calibrated	6/28/2017
Background Location (Upwind of Facility)		Background Value (FID Reading ppm)	

Time	Location	FID Reading ppm	Comment
1405	HW 4-6	4.21	
1406	HW 4-51	2.73	
1406	EW 4-12	6.90	
1408	EW 4-35	8.95	
1410	EW 4-47	28.95	
1412	EW 431	2.65	
1414	EW 4 22R1	2.49	
1415	H 45A	2.86	
1417	EW 4-24	200.95	
1418	EW 4-14	500.98	
1420	EW 44A	2.76	
1425	HW 415	3.36	
1426	EW 410R	3.05	
1428	TC 08	2.39	

Investigator: J Wagner / A Faulch / S Cawley Date: 6/28/17
 Weather Conditions: Clear 66°F wind 1 NVE 62% H

CASE: IESI

ODOR PATROL SURVEY

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
Applebutter	906	N			
Sherry Hill	907	N			
Pingroffer	910	N			
Applebutter	912	SL	1	O	light wood burning odor
Styline	915	N			misters running @ IESI
Applebutter	922	N			
ENTER LANDFILL	925				

Investigator: J. Waggoner / K. Eason / J. Oliver Date: 6/28/17
 Weather Conditions: _____

CASE: IE51
 ODOR PATROL SURVEY

SURVEY LOCATION	TIME	ODOR INTENSITY	ODOR DURATION	ODOR DESCRIPTION	EFFECTS #	COMMENTS & OBSERVATIONS
		S = Strong M = Moderate SL = Slight N = None	P = Persistent I = Intermittent N = None	EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)		
Shinersville	847	N				
Saucen Ave	848	N				
Roberts	850	N				
Snyder	850	N				
Matthews	851	N				
Mixsell	851	N				
Adams	852	N				
Johnston	852	N				
Jefferson	853	N				
Riverside	853	N				
Fritz	854	N				
Stewart Johnston	854	N				
Snyder	856	N				
Schwab	856	SL	1	0		very light "perfume" odor
Matthews	857	N				
Riverside	858	N				
Bedington	901	N				
Lwr. Saucen Rd.	905	N				

Date(s) of Inspection: **7/13/17** TV SM NM PA GP MEGA
 Permit #(s): **48-00027** Expiration Date: **4/12/18** Case #: **—** PF ID #: **549728**

Company Name: **IESI PA Bethlehem Landfill** Municipality: **Lower Saucon Twp.** County: **Northampton**

Plant Name: **—** Physical Location: **same** Federal ID — Plant Code #: **22-3575227-1**

Responsible Official: **Donald Hallouk** Mailing Address: **2335 Applebitter Rd.**

Title: **District EM** **Bethlehem, PA 18015**

Phone #(s): **518 783-2827**

Mark (X) All Inspection Types That Apply To This Inspection:

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

Annual Compliance Certification Received: YES NO N/A Date Received: **3/1/17**

AIMS Report Received: YES NO N/A Date Received: **2/29/17**

Mark (X) All Activities That Apply:

- File Review
- Pre-Inspection Observations
- Visible Emissions Observations
- Pre-Inspection Briefing
- Check For New/Unreported Sources
- Verify Operation of GEMS
- Exit Interview/Briefing
- Sample(s) Collected
- Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

On July 13, 2017 I conducted a routine partial/complaint inspection at IESI PA Bethlehem Landfill (IESI). Mr. David George, SCS Field Services was present on behalf of IESI. During the inspection I observed Mr. George conduct monthly wellhead monitoring on several gas wells. No fugitive, visible or malodorous emissions were noted at this time. Also at this time I followed up on a complaint received by the DEP on 6/23/17. I requested that IESI submit LFC data for the time of the complaint. An odor patrol was conducted in areas surrounding the landfill. No landfill related odors were detected. See attached log. IESI submitted LFC data following the site visit. No AQ violations noted at this time.

Compliance Status: In Out Pending Awaiting Co. Report Needs a Follow-Up Inspection? Yes No

Company Representative: **Sent via First Class Mail & E-mail** Title: Signature: Date:

DEP Representative: **Jessica Wagoner** Title: **AQS** Signature: **Jessica Wagoner** Date/Time: **7/14/17**

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.

Wagoner, Jessica

From: Nicholas Rogers <nicholas.rogers@progressivewaste.com>
Sent: Thursday, July 13, 2017 9:44 AM
To: Wagoner, Jessica
Cc: Donald Hallock
Subject: BRE Plant Avg Flow 6/22 and 6/23

Date Daily LFG Average SCFM

6/22/17	2,059.1scfm
6/23/17	2,042.4scfm

Nick Rogers
Environmental Compliance Manager
Waste Connections
Blue Ridge & Bethlehem Landfill

Blue Ridge: 717-709-1700
Bethlehem: 610-317-3200
F: 717 709 9012
C: 484-456-1650



Wagoner, Jessica

From: Nicholas Rogers <nicholas.rogers@progressivewaste.com>
Sent: Thursday, July 13, 2017 10:07 AM
To: Wagoner, Jessica; Donald Hallock
Subject: Bethlehem Flare Chart Data
Attachments: Bethlehem Flare 20170618 - 20170624.pdf

Jess attached is chart data that covers 6-18 to 6-24. Let me know if you need anything else.

Thanks

Nick Rogers
Environmental Compliance Manager
Waste Connections
Blue Ridge & Bethlehem Landfill

Blue Ridge: 717-709-1700

Bethlehem: 610-317-3200

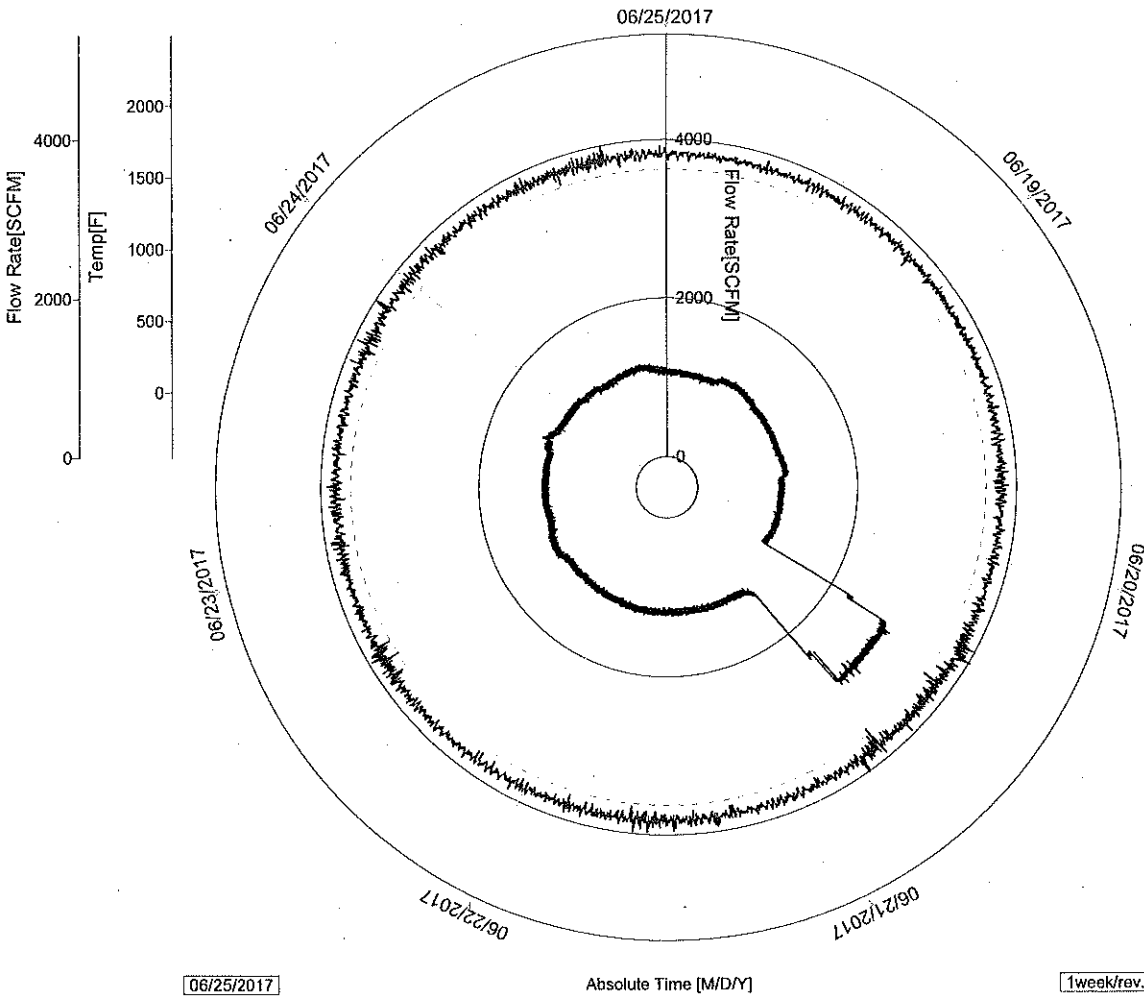
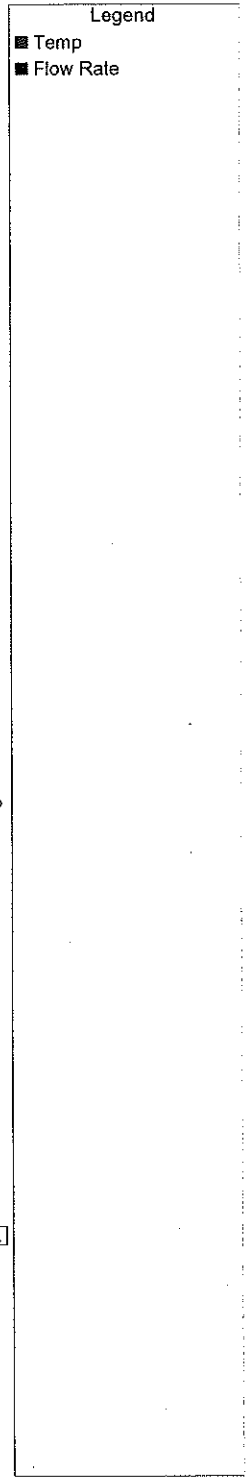
F: 717 709 9012

C: 484-456-1650



File Name : 000658_Beth170618_000100.DAD,....,000664_Beth170624_000100.DAD
File Message : Bethlehem Flare
Device Type : DX1000
Serial No. : S5R406644
Time Correct. : None
Starting Cond. : Auto
Dividing Cond. : Auto
Meas Ch. : 2
Math Ch. : 6
Ext. Ch. : 0
Data Count : 10080
Calibration Corrected Ch. : None
Sampling Int. : 60.000 sec
Start Time : 06/18/2017 00:01:00.000
Stop Time : 06/25/2017 00:00:00.000
Trigger Time : 06/25/2017 00:00:00.000
Trigger No. : 10079
Damage Check : Not Damaged
Started by : [Key In]
Stopped by : [Running]

Print Group : Bethlehem
Print Range : 06/18/2017 00:01:00.000 - 06/25/2017 00:00:00.000
Comment :



06/25/2017

1week/rev.

Investigator: J. Wagoner Date: 7/13/17 CASE: 1ES1
 Weather Conditions: 91°F, E@2.7mph, 102% humidity, clear **ODOR PATROL SURVEY**

SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DURATION P = Persistent I = Intermittent N = None	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
Shimmersville Rd	10:38	N			
Saucan Ave	10:40	SL	P	O	woodburning
ROBERTS AVE	10:42	N			
Snyder Ave	10:42	N			
MIXCELL AVE	10:43	N			
Adams Ave	10:44	N			
Johnston Ave	10:44	N			
Jefferson Ave	10:45	N			
Riverside Dr	10:45	N			
FITZ AVE	10:46	N			
Johnston Ave	10:47	N			
Snyder Ave	10:48	N			
Schwab Ave	10:49	N			
Matthews Ave	10:49	N			
Riverside Dr	10:53	N			
Reddy Ln Rd	10:50	N			
Lower Saucan Rd	10:57	N			
Sherry Hill Rd	11:00	N			

Investigator: J. Wagoner Date: 7/13/17 CASE: IES1 ODOR PATROL SURVEY

Weather Conditions: see pg 1

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
Ringhoff Rd	11:02 AM	N	N		
Appenistal Rd	11:04 AM	N	N		
Skyline Dr	11:07 AM	N	N		