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BETHLEHEM DISTRICT OFFICE

September 11, 2015

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



Attn: Mr. Jack Cahalan

Re: IESI PA Bethlehem Landfill  
Permit # 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 610-861-2150.

Sincerely,

*Jessica Wagoner*

Jessica Wagoner  
Solid Waste Specialist  
Waste Management Program

**ROUTING**

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



## 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 LEE ZIMMERMAN  
 Person Interviewed AL SCHLEYER  
 Inspector Jessica Wagoner  
 eFACTS ID # PF 268729 SF 266826

Telephone # 610-317-3200  
 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

Comment: Additional efacts # 2404546, 2395664, 239800, 2404541, 2404542, & 2404544

Inspection Date: 9 / 1 / 2015 Type: Routine Complete Results: No Resolved: / /  
**Violations**

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				
<b>GENERAL PROVISIONS</b>							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required insurance in effect (expiration date <u>12/31/2015</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
<b>DAILY OPERATIONS</b>							
<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator complies with Air Quality Plan approval and Air quality Operating Permit.	<input type="checkbox"/>	273.217(b)	18

Site Name	IESI PA BETHLEHEM LANDFILL
ID Number	10020
Date	9/1/15

**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				
				<b>DAILY OPERATIONS (Cont'd)</b>			
<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				
<b>DAILY OPERATIONS (Continued)</b>							
<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 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
<b>COVER/SLOPES/REVEGETATION</b>							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily/intermediate cover meets performance and design requirements.	<input type="checkbox"/>	273.232(b), 273.233(b), (c)	52
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minimum 5 day supply of daily and intermediate cover maintained on-site.	<input type="checkbox"/>	273.232(c) & 273.233(d)	53
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Intermediate cover applied within time limits.	<input type="checkbox"/>	273.233(a)	54
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Intermediate slopes do not exceed 50%.	<input type="checkbox"/>	273.232(d)	55
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cap placed over entire surface of final lift meets performance standards.	<input type="checkbox"/>	273.234(a)(1)	56
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final cover meets performance and design requirements; applied within time limits.	<input type="checkbox"/>	273.234(b)-(e)	57
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final slopes stable and erosion controlled.	<input type="checkbox"/>	273.234(f)	58
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final slopes graded 3-15% or terraced to 33% as approved.	<input type="checkbox"/>	273.234(g)	59
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minimum revegetation and successful revegetation requirements adhered to.	<input type="checkbox"/>	273.235(a)-(e) & 273.236(a), (b)	60
<b>WATER QUALITY PROTECTION</b>							
<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
<b>LINER SYSTEM</b>							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Liner system designed, constructed, operated, and maintained when required.	<input type="checkbox"/>	273.251(a), (b)	65
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Edge of liner requirements adhered to (i.e., no waste within 25 feet of adjacent liner, 4 feet high lined berm, to prevent lateral escape of leachate, adequate spacing on inside of berm to collect stormwater and sediment).	<input type="checkbox"/>	273.252(d)	66
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate detection zone monitored weekly.	<input type="checkbox"/>	273.255(c)	67
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover protects primary liner and leachate collection system and allows free flow of leachate into the collection system.	<input type="checkbox"/>	273.257(a)	68
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover meets minimum requirements and at least 18 inches thick.	<input type="checkbox"/>	273.257(b)	69
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collection system within protective cover meets minimum requirements.	<input type="checkbox"/>	273.258(a), (b)	70
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.	<input type="checkbox"/>	273.259(a)-(d)	71
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8 feet of select waste placed over protective cover.	<input type="checkbox"/>	273.260	73
<b>LEACHATE TREATMENT</b>							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collected and handled through Department approved method(s).	<input type="checkbox"/>	273.272(a)-(c)	74
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate transportation requirements adhered to.	<input type="checkbox"/>	273.273(a)-(c)	75
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cessation of site operation if alternate leachate handling not available.	<input type="checkbox"/>	273.273(d)	76
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate treatment system permitted and fully operational at least 3 years before closure.	<input type="checkbox"/>	273.273(e)	77
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate recirculation in accordance with regulations.	<input type="checkbox"/>	273.274(1)-(4)	78
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallons, whichever is greater.	<input type="checkbox"/>	273.275(a)-(f)	79
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate flow rate measured daily; analyzed quarterly.	<input type="checkbox"/>	273.276(a)-(b)	80
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Department notified when remedial action(s) required.	<input type="checkbox"/>	273.277(1)-(4)	81
<b>WATER QUALITY MONITORING</b>							
<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
<b>RECORDKEEPING AND REPORTING</b>							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operational records maintained, available and submitted as required.	<input type="checkbox"/>	273.288 & 273.311-273.313	86
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily Operational Records kept in accordance with regulations for the life of the facility bond or longer if necessary.	<input type="checkbox"/>	273.311(d)	87

**INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)**

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

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator submits quarterly operation report.	<input type="checkbox"/>	273.312	88
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator submits annual operation report with fee.	<input type="checkbox"/>	273.313	89
				<b>MINERALS AND GAS</b>	<input type="checkbox"/>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Gas venting and monitoring in accordance with approved plans.	<input type="checkbox"/>	273.292(a)-(d)	90
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Combustible gas levels not exceeded.	<input type="checkbox"/>	273.292(e)	91
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Forced gas venting if required.	<input type="checkbox"/>	273.292(f)	92
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Gas recovery conducted as per approved plan and §273.293, including annual analysis.	<input type="checkbox"/>	273.293(a), (b)	93
				<b>EMERGENCY PROCEDURES</b>			
<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
				<b>RECYCLING</b>			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator shall salvage and recycle waste in accord with recycling plan. (273.196)	<input type="checkbox"/>	273.331(a)	95
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Salvaging and recycling controlled by operator and prevents interference within operations and prevents health hazardous nuisance.	<input type="checkbox"/>	273.331(b)	96
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Salvaged materials stored in an approved area or transported offsite.	<input type="checkbox"/>	273.331(c)	97
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drop off center established for at least three recyclables.	<input type="checkbox"/>	273.332(a)	98
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drop off center properly located, contains bins or containers, open at least 8 hours per week and 4 hours during evenings or weekends.	<input type="checkbox"/>	273.332(b), (c)	99
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved public notice of availability of drop off center availability is provided.	<input type="checkbox"/>	273.332(d)	100
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	On or before January 15 each year, operator informs municipality in writing of weight and type of materials recycled previous year.	<input type="checkbox"/>	273.332(e)	101
				<b>SPECIAL HANDLING AND RESIDUAL WASTES</b>			
<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





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 9/1/15 Identification Number 100200

Company/Facility/Site Name IESI PA Bethlehem Landfill

On August 31, 2015 (this inspector) conducted a routine partial inspection, and on September 1, 2015 this inspector conducted a routine complete inspection at IESI PA Bethlehem Landfill (IESI). Ms. Tara Quinlivan, Air Quality Specialist, was also present on behalf of the Department. Mr. Allen Schleyer was present on behalf of IESI.

August 31, 2015 Site Tour (eFACTS#2404546)

The weather at this time was described as 74.4°F, 79% humidity, mostly cloudy, with a south wind at 1.2 mph.

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 working face was located in Cell 4D. Multiple trucks were observed unloading throughout the day. Working face odors were detected in the immediate area of the working face. The misters were observed operating intermittently throughout the inspection.

Ms. Quinlivan conducted a surface monitoring inspection on the northern slope area and top of the landfill. Fifty points were monitored and thirteen exceedances were noted. Some minimal gapping/cracking was observed at the base of a few wells. Refer to the Surface Methane Monitoring Field Sheet attached to the Air Quality Report # 2406064 for full details of the surface monitoring inspection. No waste was observed coming through the intermediate cover. Litter was minimal. No seeps or significant erosion was noted. Some intermittent landfill gas odors were noted while conducting the surface monitoring inspection.

The flare was operating at the time of the inspection and Bethlehem Renewable Energy was down.

September 1, 2015 Site Tour (eFACTS# 2404548)

The weather at this time was described as 88.0°F, 46% humidity, clear, with a variable wind at 4.6 mph.

The working face was located in Cell 4D. Multiple trucks were observed unloading throughout the day. Working face odors were detected in the immediate area of the working face. The misters were observed operating intermittently throughout the inspection.

Ms. Quinlivan conducted a surface monitoring inspection on the southern slope of the landfill. Fifty-one points were monitored and ten exceedances were noted. Some minimal gapping/cracking was observed at the base of a few wells. Refer to the Surface Methane Monitoring Field Sheet attached to the Air Quality Report # 2406064 for full details of the surface monitoring inspection. No waste was observed coming through the intermediate cover. Litter was minimal. No seeps or significant erosion was noted. Some intermittent landfill gas odors were noted while conducting the surface monitoring inspection.

Grading of the south slope and addition of soil to the south slope is conducted as needed. An employee was observed touching up some areas on the south slope during the inspection.

Mr. Schleyer stated that IESI has ordered 150 truckloads of topsoil to place on the intermediate cover areas that will not have temporary capping installed. Once the soil is in place IESI will hydro-seed the area. Mr. Schleyer stated a load of the topsoil was going to be delivered on 9/2/15 and he planned to send a sample to the Penn State lab to determine the nutrient load.

The flare was operating at 1649°F and 3416 scfm, and Bethlehem Renewable Energy was down.

Following the site tour 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.

Records Review:

Daily Tonnage- Records were reviewed from August 1-28, 2015. There did not appear to be any exceedances. The highest daily tonnage was 1,261.30.

Overweight trucks- Records were reviewed from August 1-31, 2015. IESI recorded 33 overweight trucks.

Radiation detector calibration- The stationary and handheld detectors calibration expires 6/12/16.

Daily background checks- records were reviewed for August 2015 and appear complete.

Radiation hits- Since the last inspection there were six hits.

Date	Source
8/12/15	I-131
8/13/15	TC-99M (The truck driver was the source.)
8/15/15	I-131
8/20/15	I-131
8/26/15	I-131
9/1/15	I-131

Scale Calibration- The scale was calibrated on 6/30/15.

Leachate flow- The leachate flow for July 2015 was 964,384 gallons.

Odor Patrol Logs- Logs were reviewed for August 2015.

Recycling notice- Notice was published in the Morning Call on July 9-11, 2015.

DEP Staff – The following Department staff have been onsite since the last inspection: Tara Quinlivan (8/3/15), Susan French (8/12/15), and Bharat Bham (8/25/15).

Complaints (eFACTS #2395664, 2398000, 2404541, 2404542, and 2404544)

Since the last routine complete inspection at IESI the Department has received 8 complaints. The complaints were followed up with odor patrols conducted by the Department. IESI's daily operations records were reviewed for these dates. Copies of the odor patrols are attached to this report.

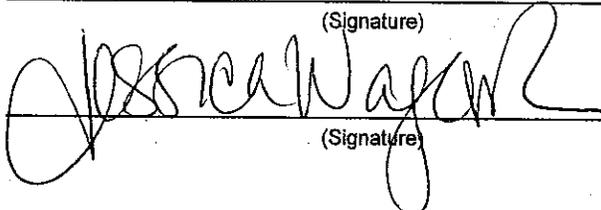
IESI was provided with a list of the dates and times of these complaints so that IESI could provide information on landfill gas being sent to the flare and to BRE at the time of the complaints.

This concludes this inspection a no violations were noted.

Person Interviewed Sent via First Class Mail Date \_\_\_\_\_

(Signature)

Inspector



(Signature)

Date 9/10/15

23915664

IESI PA BETHLEHEM LANDFILL  
ODOR PATROL SURVEY

Investigator: J. Waggoner / A. Fowler Date: 8/4/15  
Weather Conditions: 83.6°F, 85W @ 5.8 mph, partly cloudy, 52% humidity

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
41A	1451	N			
Shumersville Rd.	1452	M	P	S	NW STP
Saucon Ave	1453	N			
Roberts Ave	1453	N			
Snyder Ave	1454	N			
Mixsell Ave	1454	N			
Adams Ave	1455	N			
Jannston Av	1456	N			
Snyder Ave	1456	N			
Schwab Ave	1457	N			
Mathews Ave	1458	N			
Riverside Dr	1459	N			
Shumersville Rd	15:00	N			
Applebutter Rd.	15:06	SL	I	S	
Lower Saucon Twp.	15:07	N			
Redington Rd.	15:13	N			
Lower Saucon Rd.	15:20	N			
Applebutter Rd.	15:21	SL	P	S	

2398000

IESI PA BETHLEHEM LANDFILL  
ODOR PATROL SURVEY

Investigator: Jessica Wagoner Date: 8/11/15

Weather Conditions: 68.9°F rain, wind @ 3.5 mph, 100% humidity

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
Main	09:11	SL	P	S	garbage day
Shinersville Rd.	09:12	SL	P	S	
Riverside Dr.	09:15	N			garbage day
Jefferson Ave.	09:15	N			
Johnson Ave.	09:17	N			
Snyder Ave.	09:17	N			
Schwartz Ave.	09:19	N			garbage day
Adams Ave.	09:20	N			garbage day
Mixell Ave.	09:21	N			garbage day
Robert Ave.	09:22	N			
Saucan Ave.	09:23	SL	P	S	@Shinersville Rd.
Shinersville Rd.	09:24	SL-M	P	S	
Applewater Rd.	09:30	N			
Upper Saucan Rd.	09:31	N			
Bedington Rd.	09:34	N			
Lower Saucan Rd.	09:40	N			
Sherry Hill Rd.	09:43	P			
Ringhoff Rd.	09:44	N			



IESI PA BETHLEHEM LANDFILL  
ODOR PATROL SURVEY

240454

Investigator: J. Wagner/A. Faulch Date: 8/27/15  
Weather Conditions: 62.7°F, wind 2.3SSW, clear

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
Shimersville	818	N			
SawCon Ave	820	N			
Roberts	822	N			
Snyder	822	N			
Johnston	822	N			
Mixsell	823	N			
Adams	823	N			
Johnston	824	N			
Jefferson	825	N			
Riverside	825	N			
Fritz	826	N			
Johnston	826	N			
Snyder	827	N			
Schwab	828	N			
Mathews	829	N			
Riverside	829	SL	1	O	very light skunk odor
Shimersville	831	N			
Applebutter	832	SL	1	O/LFG/G	wood burning odor near chimney, gas, garbage & liq. grade odor near landfill entrance



IESI PA BETHLEHEM LANDFILL  
 ODOR PATROL SURVEY  
 2404542

Investigator: J. Wagner / T. Quinn, Date: 8/31/15  
 Weather Conditions: 74.4°F S @ 1.2 mph, mostly cloudy, 79% humidity

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
Main	0935	SL	WP P	S	
Shinersville	0936	SL	P	S	
Saucun Rd.	0938	N			garbage
Roberts Ave	0940	N			
Mixsell Ave.	0941	SL	I	S	very light sewage/musty water
Adams Ave.	0942	N			
Johnston Ave	0942	N			
Jefferson Ave	0943	N			
<del>Fritz Ave</del> Rickard	0944	SL	I	S	
Fritz Ave	0944	SL	I	S	
Pat Schwab Ave	0945	N			
Snyder Ave	0946	SL	I	S	
Johnston Ave	0947	SL	I	S	
Mathews Ave	0948	N			
Riverside Dr.	0949	N			
Shinersville Rd.	0950	N			
Applebush Rd.	0951	N			
Skyline Dr - #4	1007	SL	I	S	

IESI PA BETHLEHEM LANDFILL

Investigator: J. Wagner / T. Quimlin Date: 9/1/05

Weather Conditions: 88.0°F, 40-50 mph variable direction, 40% humidity, clear 2404544

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
Countryside Ln	1320	N			
Applebutter Rd.	1325	N			
Skyline Dr.	1328	N			
Applebutter Rd.	1332	N			
Shimmersville Rd.	1332	SL	I	O	diesel exhaust - passed truck
Saucon Ave	1336	N			0.90 ppm
Roberts Ave	1330	N			
Mixsell Ave	1339	N			
Adams Ave	1339	N			
Johnston Ave	1340	N			
Jefferson Ave	1341	N			
Riverside Dr.	1341	N			
Frite Ave	1341	N			
Schwab Ave	1343	N			
Snyder Ave	1343	N			
Johnston Ave	1344	N			
Matthews Ave	1345	N			
Shimmersville Rd.	1348	N			



**BETHLEHEM LANDFILL**  
**LEACHATE DEMAND REPORT**  
**July 2015**

<u>Location</u>	<u>Total gallons</u>
LMC-6	7,941
LMC-7	37,555
LMC-8	41,685
LMC-10	1,559,000
PS-1	520,167
PS-2	102,602
PS-3	27,615
Phase-IV	650,384

Total LMC-10 Flow = LMC-6, 7, 8, Abatement Well System, Phase I and II, and LFG condensate. Phase-IV total from PS-1, PS-2 and PS-3.

Total Discharge

LMC-10	1,559,000
<u>Phase IV</u>	<u>650,384</u>
<b>TOTAL</b>	<b>2,209,384 gallons</b>

Total Leachate

Leachate	314,155
<u>Phase IV</u>	<u>650,384</u>
<b>TOTAL</b>	<b>964,539 gallons</b>

LMC-10 Flow – Abatement System Flow = Leachate System Flow (gallons).  
Abatement System Flow = 1,244,845 gallons (Neptune Flow meters)

IESI PA BETHLEHEM LANDFILL ORDOR PATROL SURVEY - 2015

INITIALS	DATE	SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	WIND DIRECTION	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
MS	7-5-15	STEEL CITY	9:00 AM	N		NONE	OBSERVED BY D.E. PARKER
MS	7-7-15	JOHNSON ST. / RIVERSIDE JERUSALEM, HILL PLAINS RIVERSIDE	8:00 AM	N		NONE	CITY REPAIRING ROADS
MS	8-3-15	RIVERSIDE / JERUSALEM, JOHNSON	1:35 PM	N	SW	NONE	CHRISTMAS SEPTIC PUMPING AT JOHNSON ST. BY DETROIT
MS	8-4-15	ON SITE BETHLEHEM TOWER		N			
		NORTH MSE + WATER TOWER, SOUTH WEST					
		ROAD ALONG SPANET	7:30 AM	N	Caln	NONE	
MS	8-7-15	APPLE BUTLER NORTH MSE + WATER TOWER,	6:40 AM	N		NONE	
		SOUTH WEST CORNER ON BETHLEHEM RD	7:15 AM	N			
			7:25 AM	N			



IESI PA BETHLEHEM LANDFILL ORDOR PATROL SURVEY - 2015

INITIALS	DATE	SURVEY LOCATION	TIME	ODOR INTENSITY S = Strong M = Moderate SL = Slight N = None	ODOR DIRECTION WIND DIRECTION	ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
#	8/20	SEFFERS	9:10	N	E		Respond to W. McC. 2002 complaint
		SORUSTON	9:15	N			
		WIBELL & SEFFERS	9:30	D	W-E		with direction change
		S HUBBARD	9:38	N			
#	8/21	Sebaston	15:45	N		N	It RAIN coming over from P. Adams rd. P. Hubert & Sebaston partly said it was information and stayed away from 10 min before leaving check N side before Sebaston
"	"	ABER SINK LF		N			
#	8/24	Porter del N	09:00	N			
		" " S	11:00	N			
#	8/28	N side LF	10:30	N			
		S side sub	12:05	N			
#	8/31	Porter del	16:00-16:40	N			measures used w/ RAGEP on file by workers from St. Martin garage & LFG



