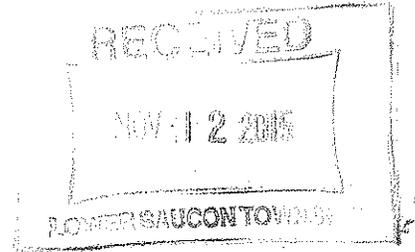




BETHLEHEM DISTRICT OFFICE

November 6, 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

S
ROUTING

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

4530 Bath Pike | Bethlehem, Pennsylvania 18017-9074

610.861.2070 | Fax 610-861-2072

www.depweb.state.pa.us



COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF WASTE MANAGEMENT
 P.O. BOX 8472, HARRISBURG, PA 17105-8472

Inspection ID 2422717

Field Code NA

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 AL SCHLEYER
 Person Interviewed AL SCHLEYER
 Inspector Jessica Wagoner
 eFACTS ID # PF 268729

Telephone # 610-317-3200
 Operator Name IESI PA BETHLEHEM LANDFILL
 Address 2335 APPLEBUTTER RD
BETHLEHEM, PA 18015
 County NORTHAMPTON
 Title DISTRICT MANAGER
 Title DISTRICT MANAGER
 Title Solid Waste Specialist
 SF 266826

Comment: Additional efacts #2418179, 2418180, 2422715

Inspection Date: 10/27/2015 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				
GENERAL PROVISIONS							
<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
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 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	100020
Date	10/27/15

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				
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

Site Name	IESI PA BETHLEHEM LANDFILL
ID Number	100020
Date	10/27/15

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				
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 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
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Soil erosion and sedimentation controls designed and implemented as per approved plans; gullies over nine inches repaired.	<input type="checkbox"/>	273.242(a)-(c)	63
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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 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
				LEACHATE TREATMENT			
<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
				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 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

Site Name	IESI PA BETHLEHEM LANDFILL
ID Number	100020
Date	10/27/15

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				
<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 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
				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 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 checked="" 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
				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



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/27/15 Identification Number 100200

Company/Facility/Site Name IESI PA Bethlehem Landfill

On October 27, 2015 this inspector conducted a routine inspection at IESIPA Bethlehem Landfill (IESI). Mr. Allen Schleyer was present on behalf of IESI.

The weather at this time was described as 56.5°F, 60% humidity, clear, with a northwest wind at 4.6 mph.

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

The working face was located in Cell 3D/4A. Two trucks were unloading at the time of the inspection. Working face odors were detected in the immediate area of the working face. The misters were observed operating intermittently throughout the inspection. Litter appeared to be controlled onsite.

Topsoil was placed on the on the top of northwest slope and the area was hydro seeded. Some grass growth was noted at the time of this inspection. Mr. Schleyer stated that they will place topsoil on the top of the southwest slope and hydro seed that area later in the week after a forecasted rain storm. They also plan to place straw on these areas. Grass growth was also noted on the lower southwest slope where seed was previously placed.

The first liner was being installed in Cell 4E Stage 3 at this time. IESI also has the north slope final cap area prepared for cap installation.

Landfill gas was being sent to the flare at the time of the inspection with a flow of 3300 scfm and a temperature of 1655°F. Bethlehem Renewable Energy was down at this time.

Records Review:

Daily Tonnage- Records were reviewed from October 1-24. There did not appear to be any exceedances. The highest daily tonnage was 1262.85 TPD.

Overweight trucks- Records were reviewed from October 1-26. IESI recorded 4 overweight trucks.

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

Daily background checks- records were reviewed from October 1-27 and appear complete.

Radiation hits- Since the last inspection there were no hits.

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

Leachate flow- The leachate flow for September was 812,247 gallons.

Odor Patrol Logs- Logs were reviewed for October 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: Susan French (10/8).

Complaints

Since the last routine complete inspection at IESI the Department has received 5 complaints. The attached spreadsheet lists

weather and gas management data collected for these complaints. In addition, 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. No violations were noted regarding these complaints.

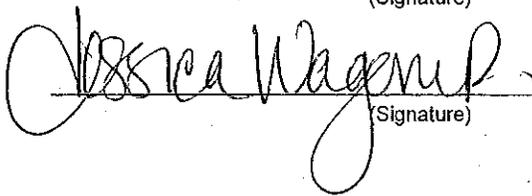
This concludes this inspection a no violations were noted.



Person Interviewed Sent via First Class Mail Date _____

(Signature)

Inspector



(Signature)

Date 11/6/15

IESI ODOR COMPLAINT LOG (2335 Applebutter Rd, Bethlehem, PA 18017)

Date	Time	Address	Weather Data (Allentown (KABE))			Gas Management Data			Addressed in Insp Report Dated				
			Distance from Landfill (miles)	Skies	Temperature °F	Wind (out of) mph	Residence / Drive-by Description / Notes	Flare (scfm)		BRE (scfm)	Total (scfm)	Date of Initial Response	
10/07/15	2152 hrs	Saucon Ave, Steel City	0.980	Clear	57.9	W @ 3.5	Drive-by	intermittent landfill gas/odors smell. Same odor almost everyday. It goes all the way down Applebutter Rd.	3248	0	3248	10/13/2015	10/27/2015
10/08/15	0900 hrs	Johnston Ave, Steel City	1.170	Clear	53.1	Calm	unknown	Intermittent garbage odor.	3281	0	3281	10/13/2015	10/27/2015
10/08/15	0938 hrs	Johnston Ave, Steel City	1.170	Clear	53.1	Calm	unknown	Intermittent garbage odor.	3238	0	3238	10/13/2015	10/27/2015
10/08/15	2152 hrs	Saucon Ave, Steel City	0.980	Clear	55	Calm	unknown	Strong odor from IESI landfill.	3269	0	3269	10/13/2015	10/27/2015
10/13/15	1109 hrs	Saucon Ave, Steel City	0.980	Overcast	57.9	W @ 4.6	Residence	Constant landfill gas odor on property. Strong enough to make it annoying.	3252	0	3252	10/13/2015	10/27/2015

2418179

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: Jessica Wagoner Date: 10/5/15
Weather Conditions: 54.2°F, N@10mph, clear, 72% 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
Maun St	1039	N			
Shimersville Rd.	1039	N			
Saucan Ave	1041	S	P	O	woodburning
Roberts Ave	1042	N			
Mathews Ave	1043	N			
Mixsell Ave	1043	N			
Adams Ave	1044	N			
Johnston Ave	1045	N			
Jefferson Ave	1045	N			
Riverside Dr	1047	N			
Fritz Ave	1048	N			
Jordan Ave	1049	N			
Snyder Ave	1049	N			
Sunward Ave	1050	N			
Mathews Ave	1051	SL	I	O	cut grass - mowing
Shimersville Rd	1054	N			
Applebutter Rd	1054	N			
Skyline Dr	1059	N			

2418180

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: Jessica Wagner Date: 10/13/15
Weather Conditions: 14.8°F SSUN @ 3.5 mph NORTAST 81% 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
MAMM ST.	1410	N			
Shimersville Rd.	1412	SL	I	O	oil/diesel - like odor
Saucon Ave	1414	SL	P	O	burning from Roberts Ave to Cw-de - ^{garbage} SL _{day}
Roberts Ave	1416	N			garbage day
Snyder Ave	1416	N			
Mixsell Ave	1417	SL	I		oil-like odor
Adams Ave	1417	N			
Johnston Ave	1418	N			
Jefferson Ave	1419	N			
Riverside Dr.	1420	SL	I	O	burn barrel burning
Fritz Ave	1421	N			oil
Johnston Ave	1422	N			
Snyder Ave	1422	N			
Schwab Ave	1423	N			
Matthew's Ave	1424	N			
Shimersville Rd.	1427	SL	I	O	oil
Applebutter Rd.	1430	N			
Skyline Dr	1430	SL	I	S	@ Applebutter Rd.

2422715

IESI PA BETHLEHEM LANDFILL
ODOR PATROL SURVEY

Investigator: Jessica Wagoner Date: 10/27/15

Weather Conditions: clear 57.5°F, NW @ 4.6 mph, 60% 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
MAUNST	1337	N			
Shumersville Rd	1338	SLM	P	O	windblowing
Riverside Dr	1340	SL	I	O	burning oil
Tefferson Ave	1341	N			
Johnston Ave	1341	N			
Adams Ave	1342	N			
Mixsell Ave	1343	N			
ROBERTS AVE	1344	N			
Saucan Ave	1345	SL	I	O	fungus mold - garbage day
ROBERTS AVE	1346	N			
Snyder Ave	1346	N			
Shawab Ave	1347	SL	I	O	cut grass
Mathews Ave	1348	N			
JOHNSTON AVE	1349	N			
Snyder Ave	1349	N			
Ivywood Ave	1350	N			
Shumersville Rd	1352	N			
Applebutter Rd	1352	N			

Wagoner, Jessica

From: Allen Schleyer <allen.schleyer@progressivewaste.com>
Sent: Friday, November 06, 2015 7:56 AM
To: Wagoner, Jessica
Subject: FW: Bethlehem complaint log
Attachments: October Complaint Log.xlsx

Jessica

Please see attached complaint log completed with the Bethlehem flare flow data. I believe BRE was not operating during that time period.

From: Keith Hoffman [<mailto:khoffman@blueflameco.com>]
Sent: Thursday, November 05, 2015 8:35 AM
To: Allen Schleyer
Subject: RE: Bethlehem complaint log

Here you go.

From: Allen Schleyer [<mailto:allen.schleyer@progressivewaste.com>]
Sent: Wednesday, November 4, 2015 2:11 PM
To: Keith Hoffman
Subject: FW: Bethlehem complaint log

Keith can you complete the Flare scfm for the attached dates and times from the datalogger

Thanks

Al

From: Wagoner, Jessica [<mailto:jwagoner@pa.gov>]
Sent: Wednesday, October 28, 2015 7:57 AM
To: Allen Schleyer
Subject: complaint log

Jessica Wagoner | Solid Waste Specialist
Department of Environmental Protection | Waste Management Program
Bethlehem District Office
4530 Bath Pike | Bethlehem, PA 18017
Phone: 610.861.2150 | Fax: 610.861.2072
www.dep.state.pa.us

IESI ODOR COMPLAINT LOG (2335 Applebutter Rd, Bethlehem, PA 18017)

Date	Time	Address	Weather Data (Allentown)			Gas Management Data				Addressed in Insp Report Dated		
			Distance from Landfill (miles)	Skies	Temperature °F	Wind (out of) mph	Residence / Drive-by	Description / Notes	Flare (scfm)		BRE (scfm)	Total (scfm)
10/07/15	2152 hrs	Saucon Ave, Steel City	0.980	Clear	57.9	W @ 3.5	Drive-by	Intermittent landfill gas/garbage smell. Same odor almost everyday. It goes all the way down Applebutter Rd.	3248			
10/08/15	0900 hrs	Johnston Ave, Steel City	1.170	Clear	53.1	Calm	unknown	Intermittent garbage odor.	3281			
10/08/15	0938 hrs	Johnston Ave, Steel City	1.170	Clear	53.1	Calm	unknown	Intermittent garbage odor.	3238			
10/08/15	2152 hrs	Saucon Ave, Steel City	0.980	Clear	55	Calm	unknown	Strong odor from IESI landfill.	3269			
10/13/15	1109 hrs	Saucon Ave, Steel City	0.980	Overcast	57.9	W @ 4.6	Residence	Constant landfill gas odor on property, strong enough to make it unbearable.	3232			

BETHLEHEM LANDFILL

LEACHATE DEMAND REPORT

September 2015

<u>Location</u>	<u>Total gallons</u>
LMC-6	6,931
LMC-7	15,820
LMC-8	36,924
LMC-10	1,391,000
PS-1	459,321
PS-2	82,830
PS-3	48,201
Phase-IV	590,352

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	1,391,000
<u>Phase IV</u>	<u>590,352</u>
TOTAL	1,981,352 gallons

Total Leachate

Leachate	221,895
<u>Phase IV</u>	<u>590,352</u>
TOTAL	812,247 gallons

LMC-10 Flow - Abatement System Flow = Leachate System Flow (gallons).
Abatement System Flow = 1,169,105 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
MB	10-16-15	Water Tower on North Perimeter Rd	9:00am	None	NW	None	
MB	10-16-15	South East corner Water Tower, Ridge Rd	7:00am 9:00am 9:30am	N N	ENE	None	
MB	10-16-15	Jumpwood, Snyder & Johnston, Mikell & Quincy	8:30am 9:00am 9:40am	N	N	None	
		Jefferson & Riverside	9:09 am	N		None	
MA	10-13-15	Jumpwood, Snyder & Johnston, Mikell & Matthews, Quincy, Jefferson - 8:13 Am	8:06am 8:07pm 8:08 8:09	N	ESE " " "	None	

Wagoner, Jessica

From: Allen Schleyer <allen.schleyer@progressivewaste.com>
Sent: Thursday, October 15, 2015 10:29 AM
To: Quinlivan, Tara; Wagoner, Jessica
Cc: Ken Minton
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 shutdown since 09/13/15 with the landfill flare as primary GCCS.

08/05/15	Turbine shutdown	07:31	Maintenance
	Turbine startup	12:34	Flare running
08/10/15	Turbine shutdown	16:50	Protective shutdown
	Turbines startup	17:10	Flare running
08/19/15	Turbine shutdown	14:29	Protective shutdown
08/20/15	Flare shutdown	13:55	To start turbine
	Turbine startup	14:50	Duration 55 min
	Flare startup	16:42	Duration 55 min turbine running
08/23/15	Turbine shutdown	00:46	Protective shutdown
08/25/15	Flare shutdown	12:05	To start turbine
	Turbine startup	13:15	Duration 1hr 10 min
	Flare startup	13:51	Duration 1hr 10 min turbine running
08/26/15	Turbine shutdown	05:14	Protective shutdown
08/27/15	Flare shutdown	11:03	To start turbine
	Turbine startup	11:56	Duration 53 min
	Flare startup	13:05	Duration 53 min turbine running
08/28/15	Turbine shutdown	14:06	Protective shutdown
	Turbine startup	15:01	Flare running
08/29/15	Turbine shutdown	02:08	Protective shutdown
09/10/15	Flare shutdown	11:15	Maintenance
	Flare startup	12:26	Duration 1hr 11 min
09/11/15	Flare shutdown	18:15	To start turbine
	Turbine startup	19:01	Duration 46 min
	Flare startup	20:17	Duration 46 min turbine running
09/13/15	Turbine shutdown	13:21	Protective shutdown

Documentation is on file.

Allen Schleyer
District Manager

Progressive Waste Solutions

T: 610 317 3200

F: 610 357 8799
C: 484 357 3135

2335 Applebutter Road
Bethlehem, PA, 18015
www.progressivewaste.com



Wagoner, Jessica

From: Allen Schleyer <allen.schleyer@progressivewaste.com>
Sent: Wednesday, August 19, 2015 4:16 PM
To: Quinlivan, Tara; Wagoner, Jessica
Cc: Ken Minton (kminton@pepcoenergy.com)
Subject: Bethlehem LF 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.

07/05/15	Turbine shutdown	12:17	Maintenance
	Turbine startup	13:02	Flare running
07/10/15	Turbine shutdown	20:37	Maintenance
	Turbines startup	21:36	Flare running
07/13/15	Turbine shutdown	07:58	Well Field Maintenance
	Flare shutdown	15:43	To start turbine
	Turbine startup	15:55	Duration 12 min
	Flare startup	17:27	Duration 12 min turbine running
07/19/15	Turbine shutdown	17:43	Protective shutdown
	Flare shutdown	23:51	To start turbine/replace Thermocouple
	Turbine startup	00:04	Duration 13 min
	Flare startup	10:31	Duration 13 min turbine running
07/28/15	Turbine shutdown	10:15	Maintenance
	Turbine startup	12:38	Flare running

Documentation is on file.

Allen Schleyer
District Manager

Progressive Waste Solutions

T: 610 317 3200
F: 610 357 8799
C: 484 357 3135

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