

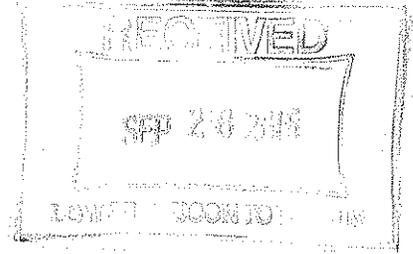


pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SECRETARY

September 23, 2015



Mr. Jack Cahalan
Township Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015

Dear Mr. Cahalan:

Thank you for your September 8, 2015, letter requesting the status of the Department of Environmental Protection's (DEP) evaluation of odors potentially associated with Bethlehem Renewable Energy, LLC (BRE) and the beneficial use of landfill gas generated by the IESI PA Bethlehem Landfill (IESI).

As part of this evaluation, DEP reviewed information detailing when potential odor causing activities, including startup, shutdown, malfunction and maintenance were being conducted at the BRE facility. These reports were compared to odor complaints received by DEP. DEP reported its findings on this matter within the Waste Management Program inspection Report dated April 21, 2015. This inspection report was mailed to Lower Saucon Township on April 29, 2015. Enclosed is the pertinent excerpt of that report. As noted in the report, there does not appear to be a correlation between offsite odors and the gas use/flow balance during shut down/start up activity between IESI and BRE. In addition, DEP has not independently confirmed that offsite odors have been generated by the operations of the BRE facility.

I hope this addresses your concerns. If you have any questions, please contact Roger Bellas, Northeast Regional Office Waste Management Program Manager, by e-mail at rbellas@pa.gov or by telephone at 570.826.2511.

Sincerely,

John Quigley
Secretary

ROUTING

- County Enclosure
- Manager
- Asst. Mgr. Lower Saucon Township Council
- Zoning Senator Lisa Boscola
- Finance Representative Robert Freeman
- Police Representative Justin Simmons
- P. Works Jim Birdsall, P.E., Hanover Engineering
- P/C B Lincoln Treadwell, Jr., Esq.
- P & R Lower Saucon Township Landfill Committee
- Engineer IESI Bethlehem Landfill
- Solicitor
- Planner
- Landfill
- EMC
- Other 717.787.2814

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This Inspector notified IESI of the flagging, litter, washouts, potential leachate seep, and leaking leachate cleanout and their need for attention as the Intermediate cover is not meeting performance standards.

Records Review:

Daily tonnage- Records were reviewed from April 1-23. There did not appear to be any exceedances. Highest daily tonnage was 1745.00 tpd.

Overweight trucks- Records were reviewed from April 1-23. IESI recorded 36 overweight trucks for this time period.

Insurance- The policy expires 12/31/15.

Radiation detector calibration- The stationary and handheld detectors were calibrated 6/9/14.

Daily background checks- Records were not reviewed for April; they will be reviewed during the May routine inspection.

Radiation hits- IESI had one hit since the last inspection.

Scale Calibration- The scale was calibrated on 12/30/14.

Leachate flow- Flow was not reviewed at this time and will be reviewed during the May routine inspection.

Odor Patrol Logs- Logs were reviewed for dates that IESI staff conducted odor patrols.

Complaints (efacts # 2355229 (3/27/15), #2356965 (3/31/15), #2361304 (4/9/15), #2361311 (4/10/15), #2361314 (4/14/15), and #2364960 (4/21/15))

Since the last routine complete inspection at IESI the Department has received 52 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.

Investigation of IESI and BRE Gas Management (efacts # 2358162)

On April 6, 2015 this Inspector conducted a file review and compared dates of IESI odor complaints with dates of startup, shutdown, and malfunction (SSM) events at BRE. This Inspector also included dates of maintenance/activity at BRE that could potentially cause odors. A table is attached detailing the findings of the file review.

At this time there does not appear to be a correlation between BRE SSM events and IESI odor complaints. This Inspector will continue to evaluate with the assistance of the Department's Air Quality Program.

2358142

January 2015

Date	DRE Shutdown/ Maintenance	BRE Start-up	ESI Odor Complaint
1/1			
1/2			2225 hours
1/3			
1/4			
1/5	1026 hours- Veolia onsite to pump out condensate tank.		1149 hours
1/6	1010 hours- Shut down Compressor A for maintenance.		1907 hours
1/7			
1/8	0822 hours- Compressor B shutdown.		
1/9	1607 hours	1616-1629 hours	
1/10	0201 hours	1521-1544 hours	
1/11			
1/12			
1/13			
1/14			
1/15	1115 hours- Veolia onsite to pump out condensate tank.		
1/16	0915 hours- Veolia pumped out condensate tank. 1048 hours- Shutdown Compressor A for maintenance.		
1/17			
1/18			
1/19			
1/20			
1/21			
1/22			
1/23	1529 hours- Shutdown Compressor A for maintenance. 1530 hours	1617-1620 hours	
1/24			
1/25			
1/26			
1/27			
1/28	0930 hours- Veolia onsite to pump out condensate tank. 1338 hours- Shutdown Compressor A for maintenance.		2130 hours 2196 hours
1/29			1430 hours
1/30			Unknown
1/31	1237 hours- Compressor B shutdown. 1239 hours	1716-1719 hours	

2352162

February 2015

Date	BRE Shutdown/ Maintenance	BRE Start-up	IESI Odor Complaint
2/1			2022 hours 2226 hours
2/2			
2/3	1658 hours 1745 hours 1820 hours	1713-1721 hours 1756-1759 hours 1827-1830 hours	
2/4			
2/5	Shut down Compressor B for maintenance.		
2/6	0945 hours- Veolia onsite to pump out condensate tank. 1011 hours	1026-1029 hours	
2/7			
2/8			
2/9			Unknown time
2/10	0800 hours- replace oil filter on Compressor B.		
2/11			~2030 hours 2042 hours
2/12			
2/13	0945 hours- Russel Reid onsite to pump out condensate tank. 1244 hours- shut down Compressor A for maintenance.		
2/14			1900-2124 hours
2/15			
2/16	0414 hours		
2/17	0700 hours- turbine maintenance.	1443-1446 hours	1102 hours
2/18			0637-0700 hours
2/19	0750 hours- Russel Reid onsite to pump out condensate tank. 0844 hours- Maintenance on Compressor A. 2209 hours		
2/20		1156-1159 hours	0707 hours
2/21	0209 hours 1624 hours	1026-1047 hours 2227-2250 hours	1730 hours
2/22			
2/23	2010 hours		
2/24	BRE DOWN		0742-0834 hours
2/25	BRE DOWN		
2/26	BRE DOWN		1843-1933 hours
2/27	BRE DOWN		
2/28	BRE DOWN		