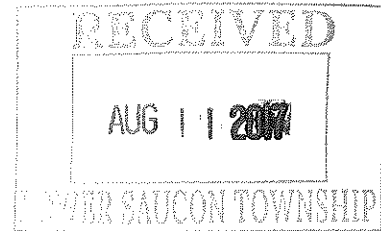


August 9, 2017

Mr. Donald Hallock, District Landfill Manager
IESI PA Bethlehem Landfill Corporation
2335 Applebutter Road
Bethlehem, PA 18015-6004



Re: Technical Deficiency Letter
IESI PA Bethlehem Landfill
Major Permit Modification – Southeastern Realignment
Application No. 100020-A151
APS# 870519 AUTH# 1072854
Lower Saucon Township, Northampton County

Dear Mr. Hallock:

The Department of Environmental Protection (DEP) has reviewed the above referenced application and has identified the following significant technical deficiencies.

Technical Deficiencies

The application originally contained a Form C-1 that referenced a Form HWC dated June 10, 2014. Therefore, the following comments refer to the most recent Form HWC dated June 23, 2017:

- Section B.1.b – In order for the Department to further evaluate the information in the Form HWC, provide a diagram of corporate structure in addition to the list in Attachment 1.
- Section B.1.c – The answer “None” appears to contradict other information provided. This Section should be answered to provide the names of corporations/partnerships/LLCs of which the principal shareholder of the applicant is also a principal shareholder/partner/member; and those entities’ compliance history should be provided in Section D. Clarify this answer.
- Section B.6 – The answer “None” appears to contradict information provided in response to Sections B.1.b and C. Re-evaluate this answer. A corporate structure diagram can be used to explain the information required in Section B.6.b.
- Section C.2 – The permit/license list is incomplete. For example, Waste Transportation Authorizations were not provided. Re-evaluate this answer for the entities in Pennsylvania to provide all permits/licenses under the Environmental Protections Acts, including those from all Department programs as well as other agencies.

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

- Section D – The compliance history provided is incomplete and should be revised. The applicant's compliance history was not included in the list. The waste transportation compliance history was not included. Other enforcement actions were missing in this submittal that had been included in past submittals. The format of the list should also be revised to ensure it includes the Permit/License/EPA ID#, Issuing Agency, and Type of Action, and to ensure it does not cut off information contained within the cells.

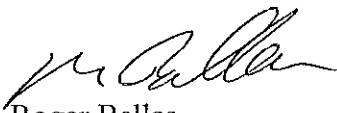
The Department is requesting IESI to provide a revised application within 60 days.

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to that deficiency, you have the option of asking DEP to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please keep in mind that if you fail to respond, your application may be denied.

Should you have any questions regarding the identified deficiencies, please contact me at the telephone number referenced below, and refer to Application No. 100020-A151, APS No. 870519, Authorization No. 1072854 to discuss your concerns or to schedule a meeting. The meeting must be scheduled within the 60-day period allotted for your reply, unless otherwise extended by DEP.

You may also follow your application through the review process via eFACTS on the Web at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,



Roger Bellas
Environmental Program Manager
Waste Management Program

cc: Martin and Martin, Incorporated
Lehigh Valley Planning Commission
Northampton County Council
Lower Saucon Township
Senator Lisa M. Boscola
Representative Robert L. Freeman
Representative Justin J. Simmons