

# Hanover

Engineering Associates Inc



January 29, 2016

## OUTLINE OF MAJOR COMMENTS

RE: IESI Bethlehem Landfill  
Southeastern Realignment  
Special Exception  
Technical Consultant Committee  
Response to 12/14/15 Review  
Hanover Project LS15-32

Refer to full letter of January 27, 2016  
From Hanover Engineering Associates, Inc.

### Odor Control

The Attachment 4 entitled the "Waste Relocation Procedures" does include many specific actions that IESI intends to take to protect the environment, but some issues are still a concern. These are listed herein:

- a. Page WRP-2 in "Cap Removal" states that the "Intermediate Cover beneath the membrane will remain in place." How would this be possible in areas where the old waste is being excavated and relocated?
- b. Page WRP-6 in "Odor Control" states that the Contractor shall "Minimize the exposed area of refuse during the relocation operations." It is recommended that a maximum area of exposure be identified.
- c. It is requested the specific "Odor Control Plan" mentioned in the IESI response letter to DEP dated December 28<sup>th</sup> be prepared and incorporated into the PPC for the entire site.
- d. Page WRP-8 in "Suspect Material Encountered during Refuse Excavation" describes the identification and remediation of uncovered waste that may need special care. It is recommended that IESI consider retaining an independent consultant to be on site on a continuous basis during all waste excavation and relocation operations to observe, record and make recommendations on specific safety, testing, odor control, handling care and relocation procedures.

### ROUTING

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

There are important environmental and neighborhood protection measures in Attachment 4 of the PPC Plan that are not identified in the Form D PA DEP major permit modification application as referenced in the Special Exception Application (Attachment 8), Neighborhood Protection Analysis, narrative and Item J. The Neighborhood Protection Analysis should include an additional Item K on Page 4, referencing the environmental and neighborhood protection procedures of an expanded Attachment 4 in the PPC Plan. The updated procedures should also be incorporated into

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the PA DEP permit application, as the effectiveness of environmental and neighborhood protection measures are dependent on these procedures being followed.

### **Closure Plan – Attachment 15**

This Attachment 15 appears to be referencing Phase IV and not addressing the proposed expansion. For example, the closure date of 2017 does not reflect the SE expansion. An adjusted and extended closure date would change the post closure bond estimates, as the inflation factors and future costs would be estimated higher. The Closure Plan and support forms dated October 2014 also do not reflect the quantity changes in such items as surface area of the site which contains trash (forms say 133 acres, where Sheet 17 of 18, final stage indicates 136 acres).

Further, the Closure Plan narrative in Attachment 15, schedules shown on the plans and the E&S narratives do not address how the final stage closure of Cell 4E will occur. According to the final closure sequencing shown on plan Sheet 17 of 18 for Stages 6 and 7 of final closure (date last revised 12/30/15), final work and closure of this far western cell will occur after all other “stages” are filled and capped. However, closure of the final stage calls for excavation of over 315,000 cubic yards of refuse from Cell 4E, while bringing in additional substantial fill to meet required slopes and grades in order to close it. The plan does not identify when and where the excavated refuse will be disposed, since all other stages will be capped up to that point.

It appears that the bonding estimates on the closure forms associated with the Cell 4E refuse excavation and disposal, and the extra fill required to meet closure of this final cell are not identified in the Closure Plan. A review of the bonding cost estimates will be part of the Host Municipal review of the Technical Portion of the DEP application and, therefore, will not be part of this review.

### **Emergency Response - Firefighting**

Documentation is to be provided by IESI to demonstrate that the City of Bethlehem still offers firefighting protection.

### **Visibility from Delaware - Lehigh Canal Towpath**

The applicant should show the top elevation of the proposed topsoil storage on Cell 4B and 4D.

### **Noise Impacts on Adjacent Residents**

Non-construction related noise levels should be checked by an independent consultant during operations. It is recommended that these readings be taken along the boundary abutting the closest residential dwelling and done quarterly during the filling of Cell SE-2A to confirm compliance with the Zoning Ordinance. .

### **Additional Trucks on Applebutter Road**

Accident histories should be submitted/reviewed to determine any crash patterns attributable to truck traffic. The adequacy of roadway signage, particularly advance warning signs for roadway

Ms. Leslie Huhn, Acting Township Manager  
Lower Saucon Township

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curvature, should be evaluated for truck traffic along the proposed Applebutter Road route. If deficiencies are found, the mitigation measures should be proposed. PennDOT comments should be sought, received and considered.

End of Outline

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