

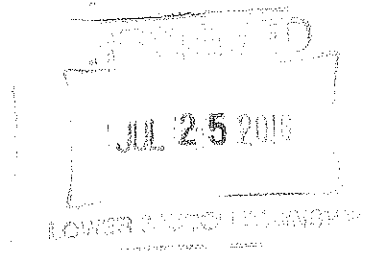


July 21, 2016

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

Attention: Ms. Leslie Huhn

Re: June 6, 2016 Information Request
IESI PA Bethlehem Landfill
Lower Saucon Township, Northampton County



Dear Ms. Huhn:

Thank you for your June 6, 2016 letter. The Department Of Environmental Protection ('Department') offers the following responses to Lower Saucon Township Council's ('LSTC') requests:

- LSTC requested that Surface Emission Monitoring ('SEM') methods be consistent between IESI PA Bethlehem Landfill ('IESI') and the Department.

IESI's surface monitoring plan is contained in their revised Gas Collection Control System ('GCCS') Design Plan submitted in December 2015. The submitted method is consistent with the requirements of 40 CFR §60.753(d). After review of IESI's initial GCCS plan submitted in July 2015, the Department requested that IESI modify its procedures to include points next to protrusions of the landfill surface such as gas wells and leachate clean outs. While not specifically required, IESI agreed to modify their procedures. The Department does not complete the full SEM exercise as outlined in 40 CFR §60.753(d) during its periodic partial inspections of the landfill. In the interest of time and efficiency, the Department chooses to focus on areas which it believes have a higher likelihood of exceeding surface emission guidelines such as cover cracks, wellhead protrusions and areas where on site landfill gas odors are detected.

- LSTC requested that the Department conduct SEM at the same time that IESI performs their next quarterly monitoring event in order to identify the source of differences in the readings.

The Department will make arrangements with IESI to be present during their next surface monitoring event.

LSTC has requested that gas equipment operating conditions (blower, gas draw, flare rates) at the time of SEM by IESI be reviewed and compared to the days when SEM monitoring is not conducted, to ensure that operating conditions are continuous and unchanging.

The Department will conduct a partial inspection in third quarter of 2016 with the specific intention of reviewing operating conditions during the second quarter of 2016 to evaluate any difference in operating conditions between IESI's SEM days and other days during the quarter.

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- LSTC has requested a determination as to why the new temporary capping has not eliminated the odors that are still being reported off site.

Since the installation of the temporary cap, the Department has observed a dramatic decrease in odor complaints received. During the six month period of January 1, 2015 through June of 2015, 148 odor complaints were received by the Department. Over that same six month period in 2016 only 10 odor complaints were received. Also, recent inspections conducted by Department staff have verified a reduction of on-site gas odors. Odors may arise from any portion of the landfill. The gas collection system is designed to minimize any off site migration of landfill gas. It is apparent to the Department that the temporary capping project coupled with gas collection system improvements and the recent permanent capping have resulted in better overall control of landfill gas at the site.

- LSTC has requested a determination as to whether or not the existing gas collection system and flare system are sized sufficiently and performing properly and continually to eliminate emission exceedances under current site conditions.

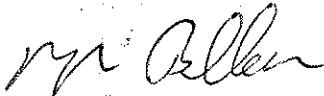
Utilizing the LandGEM modeling program, IESI predicted that in 2016 2591 SCFM of gas would be generated. IESI currently has 4000 scfm of flare capacity. Therefore, there is sufficient flare capacity to treat the expected amount of gas production. To ensure that the gas collection/ flare system is operating properly, IESI conducts quarterly surface monitoring and monthly well head monitoring. If there are well head or surface monitoring exceedances, IESI takes corrective actions within the allowable amount of time. These actions ensure that the gas collection/ flare system is operating properly in order to minimize emissions exceedances.

- LSTC has requested a status report on the IESI action plan to further investigate elevated flows of liquids in Leachate Detection Zones (LDZ).

The Department met with representatives of IESI as recently as July 12, 2016 to discuss this issue. IESI has committed to further investigation of the issue and they are still evaluating investigative options. The Department anticipates a submittal within the next few weeks.

If you have any additional questions regarding these matters, please feel free to contact me.

Sincerely,



Roger Bellas
Program Manager
Waste Management Program