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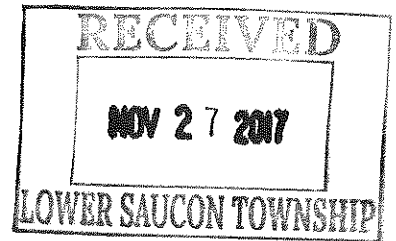
37 south main street • suite A • chambersburg, pennsylvania • 17201-2251

(717) 264-6759

(717) 264-7339 (fax)

www.martinandmartininc.com

November 22, 2017



PaDEP  
Waste Management Program  
Attn: Mr. Roger Bellas  
2 Public Square  
Wilkes-Barre, PA 18711

RE: IESI Bethlehem Landfill  
Southeastern Realignment  
Updated Transportation Compliance Plan  
and Nuisance Minimization Control Plan  
Our file: b/1162.3/2017/Cell SE-1A/b

Dear Mr. Bellas:

Pursuant to permit Condition #12 of the Southeastern Realignment Major Modification Permit, attached is updated Transportation Compliance Plan and Nuisance Minimization and Control Plan for the Bethlehem Landfill. These updated plans now include the trucks hauling cover soil and construction materials.

In the event that you have any questions in this regard, please do not hesitate to contact us.

Very truly yours,  
**MARTIN AND MARTIN, INCORPORATED**

Richard M. Bodner, P.E.

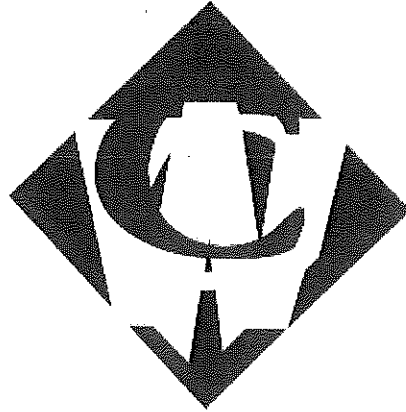
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- Finance
- Police
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- P/C
- P & R
- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EIC
- Other

enclosures  
cc: IESI Pa Bethlehem Landfill  
Lower Saucon Township  
Lehigh Valley Planning Commission  
LAW  
M&E

**MUNICIPAL • URBAN • REGIONAL • LAND DEVELOPMENT AND ENVIRONMENTAL PLANNERS**  
**MUNICIPAL • CIVIL • SANITARY • SOLID WASTE AND ENVIRONMENTAL ENGINEERS**

# TRANSPORTATION COMPLIANCE PLAN

**IESI PA BETHLEHEM LANDFILL CORPORATION  
NORTHAMPTON COUNTY, PENNSYLVANIA**



**WASTE CONNECTIONS INC.**  
*Connect with the Future<sup>®</sup>*

**TRANSPORTATION  
COMPLIANCE  
PLAN**

*Last Updated: November 16, 2017*

## **I. INTRODUCTION**

IESI PA Bethlehem Landfill Corporation (IESI Bethlehem Landfill) is committed to working with the owner/operators of soil, construction material, and waste transportation vehicles in an effort to continually improve waste transportation safety and environmental compliance. In support of this effort, IESI Bethlehem Landfill has developed and implemented this Transportation Compliance Plan, which has been disseminated to the owners/operators of soil, construction materials, and waste transportation vehicles that deliver to the facility. This plan is also maintained on file at the facility.

IESI Bethlehem Landfill is a municipal waste landfill permitted by the Pennsylvania Department of Environmental Protection (DEP) under Operating Permit No. 100020. The facility is permitted to accept municipal waste, construction and demolition waste, residual waste and special handling wastes with DEP prior approval.

All trucks are to only access the site via the attached Designated Truck Routes to IESI Bethlehem Landfill.

Upon arrival at the facility, waste transportation vehicles are required to first proceed to the scale. At the scale, the weighmaster records all the pertinent information regarding the waste delivery, customer name, truck number, gross vehicle weight, waste type and origin. All IESI Bethlehem Landfill equipment operators are trained in, among other things, waste acceptance procedures.

## **II. TRAINING AND EDUCATION**

IESI Bethlehem Landfill personnel will participate will in transportation and vehicle safety programs offered by DEP and the Pennsylvania Department of Transportation (PennDOT). Literature provided by DEP or PennDOT will be distributed to all customers, and where appropriate, incorporated into IESI Bethlehem Landfill's Transportation Compliance Plan.

Further, IESI Bethlehem Landfill has provided handouts to customers listing the hauler rules and regulations. In addition, IESI Bethlehem Landfill will distribute this Transportation Compliance Plan to all new customers. Through these measures, IESI Bethlehem Landfill will help educate all customers on the transportation regulations listed in PA Code Title 25 Environmental Protection Chapters 271-285.

## **III. STRATEGIES TO ASSIST IN COMPLIANCE**

A file will be maintained on site that includes copies of the inspection forms and any documentation that IESI Bethlehem Landfill has accumulated due to this Transportation Compliance Plan. This file will be made available to DEP for inspection.

## **IV. COMPLIANCE CHECKS**

Waste transportation vehicles will be checked at the scale house by the weighmaster on a routine basis for the following:

1. Gross vehicle weight.
2. Act 90 (Stickers and Cab Cards).
3. Tarps.
4. Signage.

In addition, operators on the landfill working face will check waste transportation vehicles after they unload to ensure that the vehicles are free of debris before they depart from the working face.

## **V. INSPECTION FORM**

Attached to this Plan is a three-part Truck Inspection Form to be utilized during the compliance checks when a violation is noted. Both the driver of the waste transportation vehicle and the person conducting the inspection will be required to sign the inspection form. A copy will be supplied to the driver and the transportation company, and a copy will be maintained in the scale house.

## **VI. VIOLATIONS**

Waste transportation vehicles will be inspected in accordance with the compliance checks listed above. Upon the first and second violation, a warning will be issued to the driver of the waste transportation vehicle and the transportation company. Upon the third violation the driver of the vehicle will not be permitted back on site for one (1) working day. Each additional infraction thereafter will result in one (1) day suspension during the month when the violation is accrued. IESI reserves the right to impose longer periods of suspension, including permanent suspensions for repeated and significant violations. All vehicles and drivers exceeding 3% of the gross vehicle weight will not be permitted back on site for three (3) working days. This program will be evaluated and revised as needed.

## **VII. ATTACHMENTS**

The attached handouts are distributed to customers and are made part of the Transportation Compliance Plan.

# ATTACHMENT I

**IESI PA BETHLEHEM LANDFILL CORPORATION  
TRUCK INSPECTION**

Date: \_\_\_\_\_ Ticket No.: \_\_\_\_\_ # Violations: \_\_\_\_\_

Customer: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Driver: \_\_\_\_\_

**VIOLATIONS**

Gross weight vehicle exceedance – 273.311 (b) (11)

Load must be completely covered during transportation - 285.211 (a)

There shall be no release or leakage of waste during transportation – 285.213 (c)

Loads in vehicles shall be secured to prevent any of the load from escaping – 285.214 (b)

Signs on transportation vehicles must include: name, city, state and zip code – 285.218 (1)

Signs must include specific type solid waste transported (6" height) – 285.218 (2) and (3)

Transportation equipment shall be equipped with a fire extinguisher – 285.213 (a)

A daily operation record needs to be maintained in the cab of each vehicle – 285.217

Residual waste transporters shall have safety equipment available – 299.216 (a)

Other - \_\_\_\_\_

Driver: \_\_\_\_\_

*Signature*

Weighmaster: \_\_\_\_\_

*Signature*

White – IESI

Yellow – Customer

Pink - Driver

# ATTACHMENT II





### **Designated Routes to IESI Bethlehem Landfill**

Waste transportation vehicles delivering waste, trucks hauling cover soil and construction materials to IESI Bethlehem Landfill are required to travel on certain designated routes to the facility. These vehicles traveling from Route 78 are required to take the Route 412 exist and travel Route 412 Northbound, turning right onto Shimersville Road just prior to the former Bethlehem Steel Plant, and then immediately following the City of Bethlehem Waste Water Treatment Facility turning right again onto Applebutter Road, and proceeding approximately 1-1/2 miles to the facility.

Waste transportation vehicles delivering waste, trucks hauling cover soil and construction materials to IESI Bethlehem Landfill that are traveling the local routes from the south side of Bethlehem and adjacent areas, are required to proceed on Route 412 Southbound, turning left onto Shimersville Road and then turning right onto Applebutter Road. Waste transportation vehicles that are traveling from areas north of Bethlehem are required to proceed through Freemansburg on Main Street, and then after crossing the Lehigh River Bridge turning right onto Shimersville Road and then left onto Applebutter Road.

Waste transportation vehicles delivering waste, trucks hauling cover soil and construction materials to IESI Bethlehem Landfill are directed to avoid traveling to the east of the IESI Bethlehem Landfill along Applebutter Road and Ringhoffer Road, unless these roads are a part of normal collection routes or unless an emergency situation required temporary use of these roads.

**NUISANCE  
MINIMIZATION and  
CONTROL PLAN**

ATTACHMENT A  
NUISANCE MINIMIZATION  
AND  
CONTROL PLAN

(To be inserted into Form 14)

November 2017

**IESI Bethlehem Landfill**  
**Southeast Realignment Application**  
**Nuisance Minimization and Control Plan – Summary**

IESI PA Bethlehem Landfill Corporation (“IESI”) has submitted an application for the Southeast Realignment of the IESI Bethlehem Landfill. Incorporated within that application, IESI has provided numerous measures to minimize and control potential nuisances associated with the operation of a solid waste disposal facility. These measures are contained in various portions of the application and comply with the Department’s municipal waste management regulations, including 25 Pa. Code §273.136. For convenience, the Table below summarizes the monitoring aspects of these measures. For each measure, the Table identifies the principal monitoring program to verify that the measure is implemented, the record keeping system used to document the effectiveness of the measure, and a reference(s) to the application documents where additional detail on the measure is available. This summary may not be exhaustive of all design elements and operational procedures contained within the application that relate to nuisance minimization or control, and this Table is not intended to limit IESI’s ability to utilize other measures if nuisance conditions arise.

Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program <sup>1</sup>	Record Keeping/Reporting <sup>2</sup>	Application Document References
Odors <sup>3</sup>	Cover (daily, intermediate and final)	Weekly inspection (at least)	Daily operations records	Form 14, Item L-2 (existing); Form 14, Item C (existing); Form 14, Items R, S, T and U (existing); Form F, Item C.7 (existing)
	Waste Acceptance Plan	Initial approval followed by review of each incoming load	Initial approval and annual confirmation; daily logs for each load; Daily, quarterly and annual operations records	Form 14, Attachment 14-3 (approved Form R for site)(existing); Form 14, Items G-2 and H-3 (existing); Form 14, Item C (existing)
	Active Gas Collection and Flare System	Gas Monitoring and Control Plan	Continuous (flare; weather); Daily (perimeter checks); Monthly (well field balance); Quarterly (surface monitoring)	Form K, Attachment K-2 (Landfill Gas Monitoring and Control Plan) (existing); Form G(B); Title V (existing); Form 54 (existing)
	Final Capping	Established Final Capping Schedule	Annual operations records	Plan Sheets LF-26 to LF-28; Form 14: Items T and U (existing); Form 28, Paragraph 2.1 (existing); IESI Response to DEP 3/27/2002 EAP Comments, Harms – Air Q./Odors/Nuisance (existing)
	Leachate Seep Control	Weekly inspection (at least)	Daily operations records	Form 14, Items R and S (existing)
	Cap/Gas System Removal	Weekly inspection (at least)	Daily operations records	Form K Narrative Response

Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program <sup>1</sup>	Record Keeping/Reporting <sup>2</sup>	Application Document References
Dust <sup>3</sup>	Access Roads – Construction	Inspection during and end of construction, then periodic	Certification of Construction	Plan Sheet LF-61 and LF-62; Form 14, Items J, J-1 and J-4 (existing); Form 14, Item L-4 (existing)
	Perimeter Checks	Daily inspection	Daily operations records	Title V (existing)
	Access Roads – Maintenance (sweeper vehicle/water truck)	Daily inspection	Continuous (weather); Daily operations records	Form 14, Item D-4 (existing); Form 14, Item L-4 (existing); Form G(A); Form 54 (existing)
	Dust Monitors (if needed)	Periodic inspection	Daily operations records	Form 14, Item L-4 (existing); Form G(A)
	Vegetate disturbed areas	Daily inspection	Daily operations records	Form H (existing); Form 14, Item L-4 (existing)
	Waste Acceptance Plan	Initial approval followed by review of each incoming load	Initial approval and annual confirmation; daily logs for each load; Daily, quarterly and annual operations records	Form 14, Attachment 14-3 (approved Form R for site)(existing); Form 14, Items G-2 and H-3 (existing); Form 14, Item C (existing)
	No Open Burning	Daily inspection	Daily operations records	Form 14, Items L-2 and Item O (existing)
Mud <sup>3</sup>	Access Roads – Construction	Inspection during and end of construction, then periodic	Certification of Construction	Plan Sheet LF-61 and LF-62; Form 14, Items J, J-1 and J-4 (existing); Form 14, Item L-4 (existing)
	Access Roads – Maintenance (sweeper vehicle/water truck)	Daily inspection	Daily operations records	Form 14, Item D-4 (existing); Form 14, Item L-4 (existing); Form G(A)
Vectors <sup>3</sup>	Cover (daily, intermediate and final)	Weekly inspection (at least)	Daily operations records	Form 14, Item L-2 (existing); Form 14, Item C (existing); Form 14, Items R, S, T and U (existing); Form F, Item C.7
	Licensed Extermination Services	Inspections by Landfill Manager and observations by landfill personnel	Daily operations records	Form 14, Item L-1 (existing)
Litter <sup>3</sup>	Tarps and covers on vehicles	Inspection of each incoming load and random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan <sup>4</sup> ) (existing)
	Working Face Management – small size and water spray	Inspection during waste disposal	Continuous (weather); Daily operations records	Form 14, Item M and Item P-4 (existing); Form 54 (existing)

Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program <sup>1</sup>	Record Keeping/Reporting <sup>2</sup>	Application Document References
	Waste Trailer Tipper	Inspection during waste disposal	Daily operations records	Form 14 – Waste Trailer Tipper 2/18/14 (existing)
	Prompt placement of daily cover	Weekly inspection (at least)	Daily operations records	Form 14, Item L-2 (existing); Form 14, Items C and M/ Form 14, Item R (existing); Form F, Item C.7
	Litter fencing	Daily inspection	Daily operations records	Form 14, Item M (existing)
	Litter patrol	Weekly inspection, and as needed	Daily operations records	Form 14, Item M (existing)
Noise <sup>3</sup>	Equipment fitted with proper mufflers	Daily observation	Daily operations records	Form 14, Item L-3 (existing)
	Onsite speed limit at 10 m.p.h.	Daily observation	Daily operations records	Form 14, Item L-3 (existing)
	Backup Motion Sensor system	Daily observation	Daily operations records	IESI Response to DEP 3.27.2002 EAP Comments, Harms – Noise, and Exhibit 17 (existing)
Traffic <sup>3,5</sup>	Hours of Operation	Daily observation	Daily operations records	Form 14, Item I (existing)
	Weight restriction compliance	Weigh each incoming load and random inspections	Scalehouse records and Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan <sup>4</sup> ) (existing)
	Vehicle signage compliance	Inspection of each incoming load and random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan <sup>4</sup> ) (existing)
	Fire extinguisher compliance	Random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan <sup>4</sup> ) (existing)
	Safety equipment compliance	Random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan <sup>4</sup> ) (existing)
	Recordkeeping compliance	Random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan <sup>4</sup> ) (existing)
	Route compliance <sup>5</sup>	Routine observation and monthly landfill advisory committee	Daily operations records	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan <sup>4</sup> ) (existing)11/2017
	Traffic flow <sup>5</sup>	Routine observation	Traffic Impact Study	Form D, Attachment 10, Exhibit 1

Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program <sup>1</sup>	Record Keeping/Reporting <sup>2</sup>	Application Document References
Runoff	Soil Erosion and Sediment Control Plan	Inspections after each rain event, daily and weekly (including landfill benches, pipes and perimeter channels)	Daily operations records	Form I, Table I-2
	Access Roads -- Construction	Inspection during and end of construction, then periodic	Certification of Construction	Form I, Section D; Plan Sheet LF-61 and LF-62; Form 14, Item D-7 (existing); Form 14, Items J-1, 3 and 5 (existing); Form 14, Item L-4 (existing)
	Leachate Seep Control	Weekly inspection	Daily operations records	Form 14, items R and S (existing); IESI Response to DEP 3/27/02 EAP Comments, harms -- Air Quality/Odors/Nuisance (existing)
Leachate	Liner System	Construction QA/QC and certification	Certification of Construction	Form 24, Attachment 24-2 (QA/AC Plan); Form 14, Items C, C-4 (existing)
	Leachate Management System	Continuous monitor via electronic sensors, and routine observation	Daily operations records	Form 25, Attachment 25-1; Form 14, Items C, C-4 (existing)
	Groundwater Monitoring System	Quarterly and annual sampling	Quarterly and Annual Operation Records	Form 18 (existing); Form 7; Form 14, Item C (existing)
	Groundwater Abatement System	Quarterly and annual sampling	Quarterly and Annual Operation Records	Form 18 (existing); Form 7; Form 14, Item C (existing)

1. - As site conditions warrant, but at least annually, IESI will review the compliance history of the facility (during preparation of the Annual Operations Report) and evaluate whether adjustments to existing operations are required to address nuisance conditions. Pursuant to such review, if an increase in nuisance conditions is identified, IESI will evaluate the occurrence of such conditions to determine whether a correlation exists with any of the meteorological monitoring data collected for the facility, and will incorporate such information into an appropriate response.
2. - The Landfill Manager encourages all Landfill personnel to report any safety hazards, public nuisances, or anything that may pose a threat to public health or the environment. The Landfill Manager maintains a log of all reports and any complaints from residents and/or the Department relative to nuisances. In addition, relevant construction and operational records note unusual conditions and corrective actions when taken, and these documents are open to regular review by the Department and Township inspectors.
3. - If IESI receives a complaint from a neighboring property owner or from an occupant along the approach routes regarding concerns with odors, dust, mud, vectors, litter, noise or traffic related to Landfill activities, IESI investigates the complaint and reports the findings to the complainant. A record of the complaint and the findings are recorded on the daily operations record.
4. - The Transportation Compliance Plan for the IESI Bethlehem Landfill provides for an annual review of the Plan and an evaluation of whether adjustments to the Plan are needed to minimize and mitigate potential conditions. TCP updated November 2017.
5. - The Transportation Compliance Plan includes trucks hauling cover soil and construction materials.