

May 7, 2018

NOTICE OF VIOLATION

Mr. Donald Hallock
IESI PA Bethlehem Landfill
2335 Applebutter Road
Bethlehem, PA 18015

Re: Notice of Violation

Dear Mr. Hallock:

On April 18, 2018 a member of the staff of this office conducted a routine partial inspection at IESI PA Bethlehem Landfill ("IESI") located in the Lower Saucon Township, Northampton County. IESI operates a municipal waste landfill under Title V ('TV') Permit #48-00027.

During the inspection several leachate seeps were observed on the northern and southern slopes at the western portion of the landfill. Leachate and landfill gas odors were detected near the leachate seeps. Surface emission readings around four of the leachate seeps ranged from 34.29-101 ppm methane. Additionally, one of the leachate seeps did not appear to be repaired since it was observed during the February 13, 2018 full compliance evaluation.

Some landfill gas wells ('wells') were observed in low lying areas. The wells have waste filled around them and have not yet been raised. The cover in these low-lying areas is inadequate as waste is exposed. One of the wells, EW 4-33R, had a reading of 10,000+ ppm methane recorded.

Significant amounts of flagging, erosion, and areas of inadequate cover were observed along the slopes of the landfill. Waste including but not limited to, mattresses, cushions, wood, insulation, a tire, and bags of garbage were observed protruding through the cover. Of note, two mattresses and one cushion observed protruding through the cover, west of well HW 4-35, registered methane readings of 2832ppm, 980ppm, and 672ppm, respectively. Landfill gas odors were present in this area. A strong landfill gas odor was detected while walking along the guiderail on the northern access road, surface emissions of 200-600ppm methane were recorded in this area. General surface emission of 100-1200ppm methane were recorded while walking the northern and southern slopes at the western portion of the landfill, and landfill gas odors were detected while walking the slopes. Nineteen exceedances of >500ppm methane were noted during the inspection.

ROUTING

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

Air Quality

Following the site inspection, IESI's Weekly Site Inspection's ('WSI') were reviewed from January 3, 2018 to April 17, 2018. Flagging of waste, leachate seeps, and erosion issues have been regularly documented on the WSI since February 19, 2018.

Review of the WSI and site observations noted above demonstrate that IESI failed to implement the Gas Collection and Control System Design Plan revised December 2015 ("GCCS") by not employing daily and intermediate cover soils per its solid waste permit to support the collection of landfill gas and not implementing cover repairs as necessary.

It was also noted that on April 1, 2018 visible emissions at the flare were noted on the WSI. This visible emissions incident was not reported to the Department within four hours, and visible emission readings were not taken to determine the opacity of the visible emissions.

During the aforementioned inspection, the following air quality type violations were noted:

- IESI operated an air contamination source in a manner inconsistent with good operating practices, in violation of TV Permit #48-00027, Section B, Condition #007 and 25 PA Code §127.444. Specifically, IESI failed to implement the GCCS.
- IESI failed to report an incident of visible emissions to the Department within four hours of the incident and make arrangements for a certified observer to verify the opacity of the emissions, in violation of TV Permit #48-00027, Section C, Condition #010 (a) (2).

TV Permit 48-00027, Section B, Condition #007 and 25 PA Code 127.444 states a person may not cause or permit the operation of a source subject to this article unless the source and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the application and conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

TV Permit #48-00027, Section C, Condition #010 (a) (2) states in part that plant personnel who observe any visible emissions (i.e. emissions in excess of 0% opacity) will report the incident of visible emissions to the Department within four hours of each incident and make arrangements for a certified observer to verify the opacity of the emissions.

You are requested to submit to this office within fifteen (15) days of receipt of this letter, an explanation for the violation, actions taken to correct the violations, a schedule to correct the violations and an acceptable plan to prevent similar future emission violations.

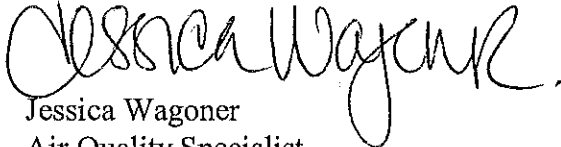
You are advised that failure to comply with the aforementioned Rules and Regulations of the Department of Environmental Protection constitutes unlawful conduct and could result in legal action, as described in the Air Pollution Control Act of January 8, 1960, P.L. 2119, as amended, 35 P.S. §4008, et seq.

May 7, 2018

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions regarding the above or desire clarification, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica Wagoner". The signature is written in a cursive, flowing style.

Jessica Wagoner
Air Quality Specialist
Air Quality Program