

SCS ENGINEERS



October 11, 2017
File No. 02198081.00

Mr. Ray Kempa, P.E.
Chief, New Source Review - Pennsylvania Department of Environmental Protection
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18711-0790

Subject: Landfill Gas Well Permanent Decommissioning Request
IESI PA Bethlehem Landfill (Title V Permit No. 48-00027)

Dear Mr. Kempa:

SCS Engineers (SCS) has prepared this letter regarding the decommissioning of several landfill gas (LFG) extraction wells at the IESI PA Bethlehem Landfill, in accordance with the EPA's New Source Performance Standards for MSW Landfills (NSPS Subpart WWW) and the landfill's Gas Collection and Control System (GCCS) Design Plan, dated December 2015.

The following wells are proposed for permanent decommissioning: HW-02, HW-03 & EW-39.

These wells are located in the old landfill area and within the limits of the new Phase I membrane liner for the Southeast Realignment and are thus no longer necessary. Gas collection from under the liner will be achieved via a series of new horizontal collectors to be installed with the liner construction, per the landfill's permit. The decommissioning will consist of removing the wellhead and connection to the header piping, and capping and sealing the pipe casing below grade. A site map of the GCCS depicting the wells to be decommissioned is attached as **Figure 1**. Recent monitoring data for these wells is attached as **Table 1**.

We appreciate your consideration of this request. If you have any questions or need more information, please do not hesitate to contact either of us at (703) 471-6150 or Mr. Nick Rogers at the IESI Bethlehem Landfill at 610-317-3200.

Sincerely,

Ryan Christman

Ryan Christman, M.S.
Staff Professional
SCS ENGINEERS

Joshua Roth

Joshua G. Roth, P.E.
Project Director
SCS ENGINEERS

cc: Mark Wejkszner, PADEP NERO
Nick Rogers, Don Hallock, IESI PA Bethlehem Landfill
Kevin Bodner, Rob Tyler, Martin & Martin, Inc.

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



**Table 1: Summary of Recent Monitoring Data
IESI Bethlehem Landfill Well Decommissioning**

Well ID	Date/Time	CH4 [%]	CO2 [%]	O2 [%]	Bal Gas [%]	Temp [°F]	Pressure [”H2O]	Comments
EW-39	4/21/2017 12:29:47 PM	18.4	15.1	0.7	65.8	55.2	-2.95	
EW-39	5/16/2017 12:51:44 PM	11.1	12.2	0.9	75.8	68.9	-4.57	Decreased Flow/Vacuum
EW-39	6/28/2017 11:49:32 AM	20.6	11.8	3.7	63.9	93	-0.56	
EW-39	7/25/2017 1:07:03 PM	26.5	13.4	2.5	57.6	73.2	-0.9	
EW-39	8/15/2017 10:30:44 AM	35.6	14.8	1.3	48.3	70.7	-0.35	
EW-39	9/27/2017 9:37:11 AM	39.7	14.6	2.8	42.9	75.4	-0.11	
HW-02	4/21/2017 12:33:21 PM	16.3	17.1	2.9	63.7	60.9	-2.7	Decreased Flow/Vacuum
HW-02	5/16/2017 12:55:19 PM	12.9	16.8	2.2	68.1	62	-1.3	Decreased Flow/Vacuum
HW-02	6/28/2017 11:46:18 AM	15.2	18.2	0.6	66	83.4	-0.19	
HW-02	7/25/2017 1:09:01 PM	7.4	16	0.7	75.9	69.5	-0.96	
HW-02	8/15/2017 10:33:58 AM	19	18.5	1.1	61.4	66.1	-1.19	
HW-02	9/27/2017 9:39:56 AM	26.4	18.8	0	54.8	66.1	-0.55	
HW-03	4/21/2017 11:47:17 AM	21.9	18.6	2.4	57.1	54.7	-2.5	
HW-03	5/16/2017 12:32:23 PM	30.4	21.6	1.5	46.5	74.9	-3.32	
HW-03	6/28/2017 11:38:43 AM	15	18.4	1.7	64.9	81.7	-1.7	Decreased Flow/Vacuum
HW-03	7/25/2017 12:42:15 PM	11.5	14.6	3.7	70.2	71.5	-1.91	
HW-03	8/15/2017 10:12:55 AM	47.3	33	0.5	19.2	70.2	-2.67	
HW-03	9/27/2017 9:19:29 AM	43.8	30.5	0.2	25.5	71.3	-1.39	

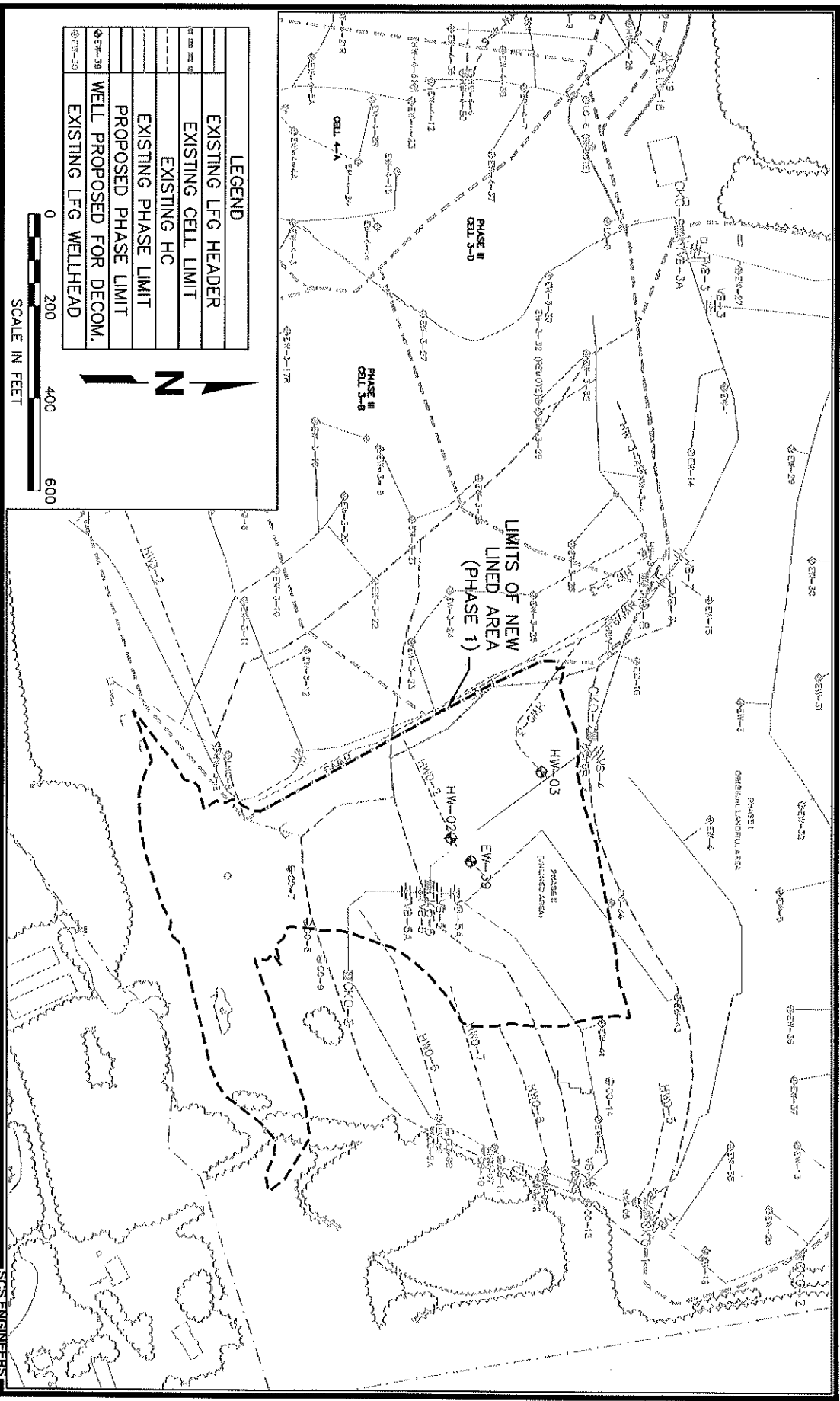


FIGURE -1 IESI PA BETHLEHEM LANDFILL - LOCATIONS OF WELLS PROPOSED FOR DECOMMISSIONING