



September 8, 2015

Township Council of Lower Saucon Township

Officials:

*Ron Horiszny, President
Tom Maxfield, Vice President
Priscilla deLeon
Glenn Kern
David Willard*

Roger Bellas, Waste Management Program Manager
Department of Environmental Protection
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18701-1915

Re: IESI Bethlehem Landfill
Minor Permit Modification – Temporary Capping
Permit #100020

Dear Mr. Bellas:

At their regular public meeting on September 2nd, the Township Council authorized me to forward technical comments and responses relative to the review of the above referenced Minor Permit Modification. Please find attached a letter from Hanover Engineering dated September 1, 2015.

The Council also wanted to report that the Township believes that the response references to “Western Expansion” are relative to a Zoning Map Amendment that was initiated in 2011 that would have re-zoned land to the west of the current IESI location. That proposed Zoning Map Amendment is no longer being actively considered by the Council of Lower Saucon Township, and any change to the Zoning Map would require that the Amendment process be re-initiated. The “Western Expansion” appears to be a term used by IESI, it is not something that is permitted by the current Zoning regulations.

The Council also authorized that you be advised that members of the public and the Township Engineer also voiced their concern about the lack of a specific time table for the final closure and final capping of this western area of the landfill. If no timetable is set for the final capping, the western portion of the landfill could remain under a temporary capped condition indefinitely.

Sincerely,

Jack Cahalan
Township Manager

Enclosure(s)

cc: Lower Saucon Township Council
Senator Lisa Boscola
Representative Robert Freeman
Representative Justin Simmons
Jim Birdsall, P.E., Hanover Engineering
B. Lincoln Treadwell, Jr., Esq.
Lower Saucon Township Landfill Committee
IESI Bethlehem Landfill

Hanover

Engineering Associates Inc

September 1, 2015

Mr. Jack Cahalan, Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015-5426

RE: IESI Bethlehem Landfill
Minor Permit Modification Temporary Capping
of the Southwest Portion of the Landfill
Hanover Project LS04-78

Dear Mr. Cahalan:

The Township's Landfill Technical Consults have reviewed the application submitted to the PA DEP on August 17th for a Minor Permit Amendment. The PA DEP does not have a timeline for Host Municipal or public comments, so we reviewed this quickly to provide any comments prior to your September 2, 2015 Council meeting. We did not have any regular quarterly meeting since the submission so these comments are coming to Council without a full committee recommendation.

The summary comment is that the consultants do not have any recommendation for Council Action. We believe the proposed Temporary Capping will help to control the amount of landfill gases and odor that escape from the uncapped portion of the landfill and, therefore, believe the project should move ahead as quickly as possible. The comments and questions from Laouessa McNemar, PE are listed as numbered items in this letter, and the responses to these are provided in BOLD print and were provided on August 27th by Rick Bodner, PE. We believe that Mr. Bodner has satisfactorily addressed the comments and questions.

TOWNSHIP LANDFILL TECHNICAL COMMITTEE COMMENTS AND RESPONSES FROM MARTIN AND MARTIN, INC. DATED AUGUST 27, 2015

1. If the south area identified will be final capped, and no further waste will be placed, why isn't the final two feet of cap soil cover and permanent vegetative stabilization being placed to complete and close this slope permanently in accordance with the existing permit?

Similar to the Cell 4E Grading Minor Modification, if the potential Western Expansion proceeds, the area of the south slope would be a part of the overlay with the Western Expansion, which would require that the final two feet of cap soil cover be removed. It is this expense and potential damage to the membrane cap that we are looking to avoid.

2. On the south slope, how long would this temporary WindDefender be in place before the final soil cover is placed (what is the schedule for final capping with final soil cover of the south slope?), and would the WindDefender layer be removed before the final soil cover is placed?

If it is determined that the Western Expansion is no longer an option, the final soil cover will be placed on the south slope temporary cap.

Yes, the WindDefender layer would be removed before final soil cover is placed.

On the west slope, will the 24ml membrane and WindDefender also be removed before any more waste would be placed, or, if that area goes right to closure grade, will the temp system be removed and the total cap as designed with the 40ml membrane, drainage layer, etc. be installed?

Yes, The 24 MIL membrane and WindDefender would be removed before any more waste would be placed on the west slope where this temporary cap system is installed.

Yes, when the west slope area is at closure grade, the final cap system with the 40 Mil liner cap system would be installed.

4. There were no details of how existing extraction wells would be handled in either area. Is the plan to remove all extraction wells below the temporary cap and bring the gas to the proposed cap edge collector trenches, or do you plan to bring the wells through the temporary cap layers in both the south and west slope areas and boot and weld them to the 40 ml (south slope) and the 24 ml (west slope) cap membranes ?

No, the existing gas wells will not be removed for temporary capping.

Yes, the existing gas extraction wells will be booted to the temporary cap liners. The cap edge collector trenches are in addition to the existing extraction wells.

5. If the existing extraction wells will be removed, where will replacement extraction wells be located?

See #4 above.

6. There was no information on the data sheets regarding permeability of the 24ml membrane. With no proposed final two feet of soil cover on either the south or west slope areas, the temporary cap areas may be nearly impervious to rain water, with no soil/vegetative infiltration prior to stormwater discharge from these areas. Do the stormwater management conveyance channels and basins that are currently constructed have the capacity to handle this increased runoff?

The 24 Mil membrane has a permeability similar to that of the 40 Mil membrane so that gas cannot vent through it.

Yes, the currently constructed stormwater management conveyance channels and basins have the capacity to handle the runoff from the temporary cap areas.

7. If approved, what is the construction time frame to have these areas temporarily capped? One month from approval? Two months?

Depending on the timing to get material manufactured upon approval, we are hopeful that construction will happen in the one to two month time frame; depending on the timeliness of approval of the Modification during the 2015 construction season.

8. How long will these temporary cap systems be in place? There was no indication as to the maximum performing life of the WindDefender layer.

See #2 above. WindDefender has a 10-year warranty. None of the areas proposed for this material will remain in a temporary capping mode for 10 years.

Please let me know if you have any questions on this review and report.

Respectfully,

LANOVER ENGINEERING ASSOCIATES, INC.



James B. Birdsall, PE
Township Engineer Representative

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