



Township Council of Lower Saucon Township

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

September 8, 2015

Mr. John Quigley, Secretary
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
P. O. Box 2063
Harrisburg, PA 17105-2063

Re: Bethlehem Landfill Gas
Bethlehem Renewable Energy, LLC (BRE)
Lower Saucon Township, Northampton County

Dear Secretary Quigley:

Thank you for undertaking the investigation of the sources of odors near the IESI Bethlehem Landfill, Permit #100020. While we understand that your mobile analytical unit (MAU) has been taking samples in the area of the landfill and we recognize that the results of that study are still being evaluated, we have not heard of any progress the Department has made with regard to the evaluation of BRE as a source of the odor. We attach a copy of your letter of April 27th, 2015 for your reference in this issue.

Please let us know if the Department has checked BRE and if so please let us know the results of the study.

Thank you for your assistance and attention to this matter.

Sincerely,

Jack Cahalan
Township Manager

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



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

April 27, 2015.



The Honorable Lisa M. Boscola
Senate of Pennsylvania
Senate Post Office Box 203018
Harrisburg, PA 17120-3018

The Honorable Justin J. Simmons
Pennsylvania House of Representatives
House Post Office Box 202131
Harrisburg, PA 17120-2131

The Honorable Robert L. Freeman
Pennsylvania House of Representatives
House Post Office Box 202136
Harrisburg, PA 17120-2136

Dear Senator Boscola and Representatives Simmons and Freeman:

Thank you for your recent letter regarding offsite odors alleged to be originating from IESI Pa Bethlehem Landfill (IESI) off of Applebutter Road in Lower Saucon Township, Northampton County.

The Department of Environmental Protection (DEP) recognizes that IESI at times causes odors, which may be detected off the landfill property and cause inconvenience to citizens that live near or travel in the vicinity of the landfill. DEP has received complaints alleging detection of odors originating from IESI or the Bethlehem Landfill Gas Facility operated by Bethlehem Renewable Energy, LLC (BRE) that is located adjacent to the landfill. However, to date investigations in response to these complaints have not verified offsite odors of sufficient character, duration and/or intensity to meet the threshold of a "malodor" violation as defined by the DEP rules and regulations (Sec 25 Pa. Code §121.1). Also, recent inspections of IESI and BRE have not noted operational violations by those facilities.

As explained to Lower Saucon Township Officials in a meeting with DEP representatives on June 24, 2014, DEP will continue to investigate odor complaints and potential sources of the odor. These investigations of odor complaints are documented in reports which are provided to the township. If an odor cannot be determined to meet the definition of a malodor and the odor source cannot conclusively be traced to a source or an operational failure at the landfill or the gas facility, DEP cannot conclude that IESI or BRE is in violation.

DEP is also investigating both IESI and BRE gas management as a possible source of odors as related to the nexus of gas use/flow balance between IESI and BRE. DEP is evaluating BRE's gas management during shut down/start-up activity as a possible source of odors. DEP's Air Quality Program and Waste Management Program continue to work closely together on this matter. In addition, DEP inspections will concentrate on the suitability of cover material to prevent odors.

On March 24, 2015, IESI notified DEP that IESI scheduled the construction of a minimum of 4 landfill gas vertical wells, 4 horizontal landfill gas collectors with connection to the landfill gas

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