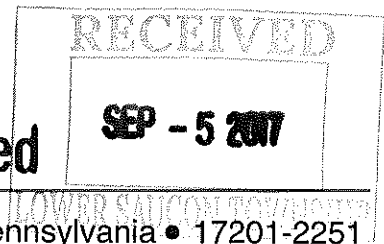




martin and martin, incorporated

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www.martinandmartininc.com

September 1, 2017

Lower Saucon Township
Attn: Ms. Leslie Huhn, Manager
3700 Old Philadelphia Pike
Bethlehem, PA 18015-5426

RE: IESI PA Bethlehem Landfill Corporation
Facility ID 100020
Phase IV and Southeastern Realignment
Land Development Plan
Hanover Project LS15-28
Response to Comment Letter Dated 9/1/17
Our file: b/1162.3/SRLDP/RL9117

Dear Ms. Huhn:

In response to the Township Consultant's comment letters dated September 1, 2017 referencing the above project we offer the following comments in **bold** for your convenience.

Lower Saucon Township Engineer's Comment Letter Dated 9/1/17

A. GENERAL COMMENTS

1. The changes would allow an increase in total landfill solid waste disposal capacity, for which a Major Permit Modification would be required. Any approval by the Township should be contingent upon approval of the Major Permit Modification.

No response required

D. SUBDIVISION AND LAND DEVELOPMENT COMMENTS

1. Sections 145-19.C(4)(b), (e), (f), and 145-34.D(8) – Upon approval of the Major Permit Modification, copies of the approved Erosion and Sedimentation Control Plans and Narrative must be provided.

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

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MUNICIPAL • CIVIL • SANITARY • SOLID WASTE AND ENVIRONMENTAL ENGINEERS

The Erosion and Sedimentation Control Plan was included within the DEP Major Permit Modification application for this project. PADEP reviews the Plan as part of the Major Permit Modification process. If there are any revisions to the E&S Control Plans and Narratives as a result of PADEP's review of the Major Permit Modification application (there have been none to date), IESI will provide a copy of such revisions to the Township.

4. Sections 145-30 and 34.D.(6) – An Improvements Agreement, with security, as found acceptable by the Township, shall be provided. It is our understanding that the only improvements to be secured with this project is landscaping, and the Township Planner will be reviewing the landscaping cost estimate.

An Improvement Security Agreement for the landscaping required by the Preliminary/Final Land Development Plan has been provided to the Township. The Agreement provided has been approved by the Township Solicitor. IESI, in accordance with the Agreement will post financial security in the amount of \$125,983.00.

24. Sections 145-33.F, 34.C(8), and 34.E – All signature blocks must be properly executed (signed, sealed, and/or notarized) prior to unconditional Plan approval.

Applicant will present to Council for signature two (2) mylar and seven (7) paper sets of the record plans executed (signed, sealed, and/or notarized) by IESI.

E. ZONING COMMENTS

1. Section 180-98 – The Applicant shall implement the suggestions to improve signing along Applebutter Road within Lower Saucon Township, and we recommend the Applicant implement the signing suggestions within the City of Bethlehem, as identified on Pages 1 and 2 of the IESI Bethlehem Landfill: Applebutter Road Safety Study prepared by Pennoni Associates, Inc. and dated July 30, 2016. If necessary, the Applicant shall obtain PennDOT approval for the proposed signage improvements along Applebutter Road.

IESI will work with PennDOT to implement all signing suggestions along Applebutter Road. We note the latest direction from PennDOT is that they will conduct their own study and implement changes as warranted by PennDOT Regulations.

F. GENERAL/TECHNICAL COMMENTS

2. The Landfill Time Line, Areas and Longevity charts on Sheet 14 of 18 shall be revised to include Cell 4E, as shown on Sheet LF-64 of the Landfill Plans submitted to DEP.

Sheet 14 of 18 has been revised to include Cell 4E within the Time Line, Areas and Longevity Charts as shown on Sheet LF-64 of the Landfill Plans submitted to DEP. A revision date of 9/1/17 has been added to plan sheet 14 of 18 as well as the cover sheet which lists the latest revision date for each sheet within the plan set. One (1) copy of the revised cover sheet and plan sheet 14 of 18 are attached hereto.

Boucher & James, Inc. Comment Letter Dated 9/1/17

1. Use

- a. ZO Section 180-102.C(2)(q) requires the copy of all required permits and supporting documents required by federal, state and local government agencies to be included in the site plan. The applicant shall provide this information to the Township, once all permits have been obtained.

IESI will provide the Township with a copy of the Major Permit Modification as soon as it is issued by PADEP.

- b. ZO Section 180-109.F(1)(b)[6] requires the submission of all Department of Environmental Protection and other applicable agencies' permit information, including but not limited to applications, review comments, and terms and conditions of permits. The applicant shall provide this information to the Township, once all permits have been obtained.

IESI has provided the Township with copies of all application materials and review comments regarding the Major Permit Modification. IESI will provide the Township with a copy of the Major Permit Modification as soon as it is issued by PADEP.

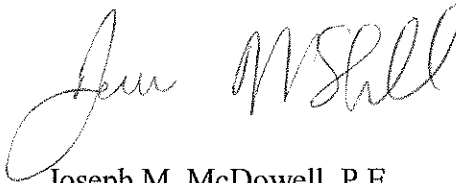
Enclosed herein is one (1) copy of each plan sheet revised as noted.

Per previous conversations with Township Staff, we are sending complete copies of this package (including all attachments and enclosures) to both Hanover Engineering and Boucher & James directly via UPS, to facilitate their review.

In the event any questions arise concerning this correspondence please do not hesitate to contact this office at your convenience.

Ms. Leslie Huhn, Manager
Lower Saucon Township
September 1, 2017
Page 4

Very truly yours,
MARTIN AND MARTIN, INCORPORATED

A handwritten signature in black ink, appearing to read "Joe McDowell". The signature is written in a cursive style with a large initial "J" and "M".

Joseph M. McDowell, P.E.

cc: Hanover Engineering (via ups, with attachments/enclosures)
Boucher & James (via ups, with attachments/enclosures)
Don Hallock (with attachments/enclosures)
Land Air Water Legal Solutions LLC (with attachments/enclosures)