Attachment 12

Preparedness, Prevention & Contingency Plan

IESI PA BETHLEHEM LANDFILL CORPORATION

A DIVISION OF

Progressive Waste Solutions

Preparedness, Prevention and Contingency Plan
(PPC PLAN)
2014

Progressive
Waste Solutions

Officer Certification

This is to certify that I have personally examined this report and am familiar with the information submitted in it and all attached documents. I am aware of all of the requirements for this report and facility. To the best of my knowledge, information and belief, the information submitted is true, accurate, and complete.

Name of Officer Sam Donato

Signature Sam J. Donato

Title District Manager

Date 6/16/14

IESI PA BETHLEHEM LANDFILL CORPORATION

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ATTACHMENT #1 - SITE LOCATION MAP

ATTACHMENT #2 – GENERAL SITE PLAN – EVACUATION ROUTE

ATTACHMENT #3- MATERIAL INVENTORY LIST

ATTACHMENT #4 – WASTE RELOCATION PLAN

ATTACHMENT #5 – WASTE REJECTION PROCEDURES

IESI PA BETHLEHEM LANDFILL CORPORATION

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN

A. FACILITY DESCRIPTION

1. Description of Activity

The Bethlehem Landfill disposal facility is an existing, permitted, double-lined landfill located on Applebutter Road in Lower Saucon Township, Northampton County, Pennsylvania. The total property on which the facility is located encompasses approximately 206 acres, of which approximately 184 acres has been permitted by the Pennsylvania Department of Environmental Protection between 1986 and 2003.

The Bethlehem Landfill was formerly owned and operated by the City of Bethlehem. It began operating on 31 acres in 1941. It was sold to Eastern Environmental Services, Inc., Mt. Laurel, New Jersey, on July 18, 1998. On April 1, 1999, Waste Management, Inc., acquired the facility from Eastern Environmental Services. IESI Corporation acquired the landfill on July 1, 1999.

Phase I, the first lined area, was used from August 1986 to December 1989. One 6-acre cell is single-lined and the other 4-acre cell is double-lined. Phase II, consisting of approximately 14 acres, began operations in December 1989. A 5.6-acre cell is double-lined and an 8.3-acre cell is unlined and was used for relocation of previously disposed waste from older portions of the site. Phase III, consisting of approximately 33.4 acres, began operations in October 1994. Phase IV, the facilities most recently approved disposal area began to accept waste in July 2003.

A ground water abatement system consisting of 13 wells was installed in 1995 to mitigate the migration of leachate from previously unlined disposal operations at the site. Two of the wells (#11, 12) were decommissioned for the construction of Disposal Cell IV-C. Water levels and pumping rates are recorded and maintained on file in the office.. The facility also has a landfill gas management system consisting of extraction wells located throughout the intermediate and capped area of the landfill and an enclosed ground flare. The closed disposal area is maintained under negative pressure to provide odor controls and significantly reduce the potential for hazards from landfill gas generated by the decomposition of the MSW. Currently the Bethlehem Renewable Energy (BRE) facility located in the south west corner of the site is operating a five (5) megawatt electrical generating plant using landfill gas as a power source. BRE operates under a separate PPC Plan on file at the Office.

Leachate and abatement well ground water is conveyed through a sewer line to the City of Bethlehem Wastewater Treatment Plant approximately 1.5 miles west of the site. The landfill has a back-up agreement with the City of Allentown, which would allow hauling to their treatment plant in the event that the Bethlehem plant is unavailable. This back-up arrangement has not been used thus far. A 390,000-gallon glass-lined storage tank is also available for emergency storage of leachate if necessary.

The facility is located within 4 miles of the Bethlehem/Hellertown Exit off of Interstate 78 and has an adequate quantity of suitable on-site cover material; IESI Bethlehem Landfill is constructed to comply with the EPA subtitle D standards. Following filling to design elevations, final cover, complete with geo-membrane capping, will be placed and the final slopes will be re-vegetated.

In order to control discharge of storm water to the adjacent areas, the entire facility has a storm water management plan design which collects all sediment-laden runoff from the landfill and conveys it to one of six sedimentation basins and four sedimentation traps prior to discharge to its natural drainage ways. The discharges from the basins are sampled semi-annually following significant rainfall events.

All of the improvements necessary to comply with the permit are in place and, as the site grows, additional lined cells or pads, access roads, storm water channels, etc., will be added to the operation per the approved design.

Attachment #1 is a site location map on a clip from the 7 1/2 minute USGS maps in the vicinity.

Surface Water Management

As the past and current disposal areas are on either side of a ridgeline, no offsite storm water drainage flows toward the disposal areas. The IESI Bethlehem Landfill incorporates a storm water management system that isolates the disposal areas from rainfall to reduce leachate generation and prevent contamination of surface water. This system is designed to collect runoff by the use of contoured land surfaces, collection pipes, stormwater channels, and swales to direct surface runoff to sedimentation basins prior to discharge to provide detention time to allow sedimentation of soil particles. At the present time the facility has 5 functional gravity discharge sedimentation basins, and four sedimentation traps which are shown on the general site plan included in Attachment #2. All of the sedimentation basins are constructed to discharge on the south side of the site and discharge to an unnamed tributary to the East Branch of the Saucon Creek. A portion of the site, which was part of the original landfill area, is already capped and re-vegetated and drains off toward the north toward the Lehigh River. The four sedimentation traps control runoff in the northern direction. The capping system, which is already in place on the original landfill area, Phases I, II, III and a portion of Phase IV, consists of a synthetic liner, and 2' of soil with vegetative cover to significantly reduce leachate generation. As the current Phase IV permit disposal areas reach final elevation, those sections will also be capped similarly.

Landfill Gas Monitoring Program

During development of the pads, gas collection wells are constructed to facilitate the removal of landfill gases. The IESI Bethlehem Landfill operates an active gas extraction system, which mechanically draws gases via a blower system out of the landfill through the wells. Gas extraction points include drilled wells and horizontal collectors and other odor control locations such as clean-out pipes.

Landfill gas is collected and routed to either the Bethlehem Renewable Energy (BRE) facility and/or the permanent ground flare system where the gases are burned. . The flare is now primarily used as a back-up control source to the BRE facility.

The IESI Bethlehem Landfill also incorporates a system of gas monitoring probes that surround the landfill. These probes are monitored quarterly to monitor for off-site gas migration. If necessary, remedial actions will be implemented promptly.

Ground Water Monitoring Program

The IESI Bethlehem Landfill administers a ground water monitoring system. This system incorporates 46 monitoring points consisting of 31 monitoring wells, 11 ground water abatement wells, and 2 surface water points. Locations of the monitoring points are shown in the engineering design plans, which are kept at the site. Well locations were selected so that upgradient and downgradient water quality could be monitored. The location of the monitoring wells, well construction and number of wells installed were approved by PADEP prior to installation. Samples are obtained from these monitoring points and are analyzed quarterly.

Radioactive Material Monitoring Program

IESI Bethlehem Landfill maintains radiation monitoring equipment that scans each load of waste that enters the scale for radioactive material. This program is in accordance with the site's Radioactive Monitoring Plan that was approved PADEP in April 2003 and updated February 2012.

Waste Acceptance and Handling

Vehicles hauling solid waste to the facility must follow the procedures and practices described in this section to ensure that the type of waste materials accepted at the facility and the manner in which waste materials are handled is carefully monitored and controlled.

Upon arrival at the facility, the gross vehicle weight (the weight of the vehicle and its contents) is measured after the vehicle has been properly stabilized on the scale. Once the gross weight is determined, the vehicle proceeds to the landfill tipping area to unload its contents. After unloading, vehicles proceed back to the scale house and weighed again prior to exiting the facility to determine the weight of the contents, which were unloaded. The net weight difference is determined for recordkeeping and billing purposes.

Prior to tipping their load at the landfill area, each solid waste transporter informs the weighmaster of the origin and type of waste being hauled. If the waste is a residual waste, municipal-like residual waste, or special handling waste, such as virgin petroleum-contaminated soils (FC-1 waste) or friable asbestos-containing waste, the driver is required to provide a manifest signed by the generator. The weighmaster verifies that the form has been completed properly and that the waste type listed is one of the acceptable waste categories. All residual waste must have prior PADEP approval before disposal.

After making these determinations, the weighmaster also signs the manifest form and allows the transporter to proceed to the landfill tipping area. The landfill equipment operator/spotter visually inspects the contents of each load of solid waste, as it is unloaded. If the equipment operator/spotter observes that the contents may be unacceptable waste, the operator/spotter will check with the weighmaster by radio. If the waste is not acceptable, the operator/spotter will reject the load and follow IESI's Waste Rejection Procedure found in Attachment #5.

Whenever there is a question regarding the classification or acceptability of any material, the weighmaster is directed to check with the compliance manager and/or landfill manager before allowing the load to proceed to the working face.

If after consulting with the landfill manager and/or compliance manager it is determined that the material is unacceptable for disposal at IESI Bethlehem Landfill, please refer to Attachment #4. This attachment describes how to proceed with unacceptable loads.

2. Description of Existing Emergency Response Plans

This Plan supercedes previous PPC Plans to conform to current report format requirements, indicate the change of ownership, and be consistent with current operating procedures. This updated PPC Plan will also be implemented in conjunction with the SPCC Plan for petroleum product spills.

3. Material and Waste Inventory Wastes

Leachate is the primary waste generated on-site. Leachate is collected through a network of leachate collection pipes located in each disposal cell. Leachate conveyance to the Bethlehem WWTP is either by gravity drain or through a pumping station to the sewer system. The collection pipes outside of the landfill liner system are double-walled to provide for secondary containment. Ground water pumped from the 11 abatement wells is discharged into the leachate collection system. The leachate piping passes through leachate management chambers at various locations on the site. The wastewater exits the landfill into a manhole along Applebutter Road. From there the wastewater is conveyed part way by gravity and the rest of the way in a force main along Applebutter Road to the City of Bethlehem Wastewater Treatment Plant.

The landfill generates gases from the normal decomposition of the waste, which has been placed into the lined disposal areas of the facility. This gas consists primarily of methane and carbon dioxide. Trace components consist of hydrogen sulfide and other gases, which lend the gas its characteristic odor. The gas is removed from the decaying waste by vacuum and is used as a fuel source for the BRE facility or burned in the on-site flare station. Condensate collected in the gas collection system is pumped into the leachate collection system.

Waste oil and antifreeze are generated by the equipment maintenance activities. Both are placed into containers labeled "waste oil or used anti-freeze" and stored at the maintenance garage. Waste oil is used as a fuel source for the maintenance building heater or taken off-site for recycling. Used anti-freeze is also collected by an off-site recycling facility. Spent parts cleaner is also collected by an off-site recycling facility.

General maintenance and office wastes are collected and deposited at the landfill working face.

Materials

Landfill equipment is fueled by an outside contractor and by the on-site fuel tanker truck (3,000 gallon capacity). A 500 gallon above ground diesel storage tank supplies fuel to the generators also located on the east side of the maintenance building. A 500 gallon gasoline tank also located on the east side of the maintenance shop is used to fuel company vehicles.

In the event of fuel spillage, absorbent materials are available on the fuel truck and in the maintenance building to absorb as much of the fuel as possible and prevent the spread of the spill. Each AST tank has secondary containment capable of containing 110% of the tank's capacity. The tanker truck is parked on an HDPE constructed pad to provide containment in the event of a leak. Concrete jersey barriers and bollards are strategically placed around the fuel storage tanks to prevent accidental contact from equipment pulling up to refuel.

Five-gallon gasoline containers for small gasoline engines are stored in the maintenance shop within a ventilated flammable materials storage cabinet. Miscellaneous cleaners and maintenance products are also stored in the maintenance shop and in the office building. Bulk storage of hydraulic oil, lubrication oil, transmission oil is stored in 275 gallon tank and antifreeze in a <250 gallon container with secondary containment are located in the maintenance shop for routine vehicle maintenance. A welding torch with an oxygen tank and an acetylene tank is also kept in the maintenance shop. The quantities of the cleaners and maintenance products are minimal that if leakage does occur it will be contained within the shop or office, where cleanup is easily accomplished. Should a leak occur, absorbent material is immediately placed on any oil or fuel spills. After the spill is absorbed, the spent absorbent shall be disposed within the landfill working area subject to the IESI Bethlehem Landfill Waste Acceptance and Classification Plan requirements. There are no floor drains in the maintenance shop.

4. Pollution Incident History

IESI Bethlehem Landfill will maintain a file of site incidents that may affect operations or the environment outside of the facility.

5. Implementation Schedule for Plan Elements Not Currently in Place

Future elements for the PPC Plan will be implemented as soon as practical when the need arises.

B. IMPLEMENTATION OF CONTINGENCY PLAN/NOTIFICATION & RESPONSE

1. Organizational Structure of Facility for Implementation

District Manager - Responsible for implementation of provisions of the PPC Plan.

Operations Manager - Assists District Manager in implementation of PPC Plan and assures accuracy of Plan.

Compliance Manager - Assists District Manager in implementation of PPC Plan and performs revision of the Plan and assures accuracy of Plan.

In the case of an emergency, the District Manager shall immediately implement the applicable provisions of this plan. During an emergency, the District Manager shall assess the actual and potential hazards to public health and safety, public welfare and the environment that are occurring or may occur. During this evaluation, steps will be taken to help mitigate and or prevent fires, spills or other hazards from occurring, recurring or spreading to other solid waste at the facility. These measures may include, where applicable, stopping operations, collecting and containing released materials or wastes, and removing or isolating containers. For the purpose of this section, the term "emergency" includes fire, spills or other events that threaten public health and safety, public welfare or the environment and personal injury.

If the effect of the incident has extended or is likely to extend off-site or if aid is required from outside agencies to mitigate the incident, the State and County Emergency Response Agencies, National Response Center and the PA Department of Environmental Protection will be notified immediately and advised of the following information:

(a) Name of the person reporting the incident and telephone number where that person can be reached;

(b) name, address and permit number of the installation;

(c) date, time and location of the incident;

Landfill Side Slopes

The development of a or leachate seep in the exterior side slope of the landfill is another potential source of leakage. Daily inspections are performed on the landfill to identify and remediate seeps to prevent off-pad migration (see Inspection/Monitoring section of this Plan). Leachate seeps identified during daily inspections are excavated and backfilled with coarse stone or aggregate to provide drainage into the leachate collection system. Removed overburden will be placed in the active working face of the landfill.

Leachate Piping System and Leachate Management Chambers

All off-pad leachate piping is contained in 100 mil (minimum) HDPE piping providing secondary containment. This provides a means for insuring the piping system's integrity. The leachate piping system passes through leachate management chambers where valves, junctions, meters, and sediment traps are located. Leakage from any of those structures will be contained within the chamber until it can be properly removed and reintroduced into the leachate collection system. Some minimal amounts of ground water seepage and rainwater leaking around the edges of the access hatches also accumulate within the chambers and is periodically removed and disposed of in the leachate collection system. An emergency leachate storage tank is located adjacent to LMC-10. In the event the City of Bethlehem's Wastewater treatment plant cannot accept leachate for disposal, the entire leachate flow can be diverted with a valve in LMC-9 into the emergency storage tank. This tank has a capacity of about 390,000 gallons. Additional emergency leachate storage was built to expand the emergency storage capacity by another 775,000 gallons. Total emergency leachate storage capacity is 1,165,000 gallons. IESI also has a contract with Allentown Wastewater Treatment Plant as an emergency back-up disposal site.

Gas Flare Station

The gas flare station burns landfill gas collected at the site to prevent the migration of gas and the associated odors from the site. The gas flare has an automated control system which monitors flare temperature, gas flow rate, methane concentration, and oxygen concentration on a continuous basis. If any of the parameters are outside normal operating range, the system automatically shuts down the flare, turns off the blowers drawing gas from the landfill, and closes the main valve between the landfill collection system and the flare. A flare shutdown will prompt the autodialer to call personnel that will respond to the flare outage and either restart the flare or troubleshoot for repairs. The flare has a paper recorder chart and data logger to record flow, temperature etc. Offsite migration of gas through the air is monitored on a daily basis by routine inspections around the landfill perimiter.

2. Material Compatibility

The IESI Bethlehem Landfill utilizes HDPE liner and pipe for the collection and conveyance of leachate. HDPE is chosen for its high strength, toughness, seam strength and, most importantly, its chemical resistance. Municipal and residual wastes are accepted for disposal after the wastes are are determined to be compatible in accordance with the Landfill's Form R requirements. Residual waste is accepted for disposal only after approval from the PADEP.

3. Inspection and Monitoring Program

Inspection and monitoring of a landfill site is an extremely important aspect of a well-run facility. A general inspection is completed by employees throughout the day during their routine work activities.

LANDFILL INSPECTIONS

The site has implemented a comprehensive landfill inspection and monitoring program to ensure the integrity of the landfill liner system, leachate collection and treatment system and daily operational procedures. Daily inspections are an ongoing routine part of the operations and include, but are not limited to:

1. Proper waste acceptance and inspection procedures. These are promulgated in the Landfill's Waste Acceptance and Classification Plan and are performed at the scalehouse and active working face.

2. Daily pad operations inspections, which include waste quantities, cover load count, trash cell size, unauthorized waste, operating pad equipment, pad litter, and pad condition.

3. Daily facility inspections which include the abatement wells, leachate management chambers, presence of leachate seeps, erosion control, litter, road maintenance, and truck wash operations and gas flare.

4. Capital projects and contractors.

5. Equipment maintenance, which includes operating time, fluids and specific parts and operating systems on each piece of equipment.

6. Visual inspection of site haul roads for accessibility, potential hazard areas, and erosion.

Weekly inspections include, but are not limited to:

1. Facility inspections, which include presence of leachate seeps, erosion control, litter, sedimentation basins, cap and final cover and site safety inspection.

2. Scale inspection includes the scale deck, load cells, and scale foundation.

FLARE STATION/BLOWER INSPECTIONS

Inspections of the flare system operations are conducted during normal work hours and are as follows:

1. Daily inspections are performed in relation to weather conditions, site conditions, and gas piping system, blower and flare system.

2. Blower and motor bearing lubrication is checked and performed by an outside contractor as needed based on the number of hours of operation of those components of the flare.

3. Flame arresters are inspected and cleaned as needed by an outside contractor.

Documentation is maintained on inspections. Any deficiencies identified in facility operations are corrected as soon as practical.

An operator who is thoroughly familiar with all items and areas to be inspected performs inspections of the landfill areas and equipment.

Inspection of the gas flare station is performed by the Compliance Manager and by an outside contractor.

As needed, the District Manager reviews site operations and completed inspection sheets with the staff and revises the PPC Plan as necessary.

The landfill buffer area contains monitoring devices (wells) to detect whether leachate or methane gas is migrating away from the fill area. Monitoring wells and gas monitoring stations are located around the perimeter of the landfill. The ground water monitoring wells are sampled quarterly to determine the local ground water quality. Quarterly gas monitoring is performed at perimeter gas monitoring wells to identify any off-pad migration. Surface air monitoring is performed quarterly on all capped portions of the landfill to check cap integrity.

All monitoring wells are kept locked at all times except when sampling is being conducted and are maintained in good condition. The monitoring wells are inspected once each month for maintenance. The area around the wells is kept free of vegetation, litter, or debris to ensure that the wells can be inspected and are readily accessible.

. After hours inspections occur as deemed necessary.

Preventative Maintenance

The operating personnel perform daily visual inspection of the equipment and perform all daily or routine maintenance activities including, but not limited to, lubrication, track cleaning and replacement of air filter elements. The Site Mechanic keeps a complete checklist and daily log of all daily maintenance and adjustment activities. Daily "walk around" inspections are critical in detecting or preventing maintenance problems and potential safety hazards.

The mechanic performs routine inspections, oil changes, adjustments, and most scheduled maintenance and repair services. An outside contractor may perform special repairs and service.

The Compliance Manager and outside contractors perform comprehensive preventative maintenance programs to insure the integrity of all aspects of the ground water abatement system, leachate collection system, gas flare and ancillary equipment. This program incorporates the following:

a. Periodic inspections of identified equipment and systems;

b. Periodic testing of equipment and systems (such as routine calibration of environmental monitoring equipment);

c. Appropriate adjustment, repair, or replacement of parts and;

d. Complete record keeping of the preventative maintenance activities, inspection and test results, calibration dates, repairs, replacements, and adjustments to the applicable equipment and systems.

5. Housekeeping Program

As was noted under the Inspection and Monitoring section, authorized personnel inspect berms, lines, valves, basins, and other structures for structural adequacy, and evaluate overall site operations and revise this plan as necessary.

In the equipment storage area and Maintenance Garage, oil or fuel spills are covered immediately with absorbent material.. After the spill is absorbed, the spent absorbent is placed within the landfill working area subject to landfill's disposal criteria. Prior to disposal of the absorbent, any such waste is stored, if necessary, and its compatibility with the liner determined prior to disposal.

In order to maintain a good housekeeping program certain activities and practices are carried out on a regular basis to reduce the possibility of accidental spills and safety hazards to facility personnel: neat and orderly storage of chemicals; prompt removal of small spillage; regular refuse pickup and disposal; maintenance of dry, clean floors by use of brooms, vacuum cleaners, or cleaning machines; and provisions for the storage of containers or drums to keep them from protruding into open walkways, pathways, or roads.

6. Security

Security procedures are employed at the installation to prevent accidental or intentional entry into the site that could result in a violation of PADEP regulations, or injury to persons include the following:

a. Facility informational sign promulgating the name, address, telephone number, and operating hours of the installation;

b. Lockable gate at the facility entrance road during off hours;

c. Fencing around the entire installation;

d. Locks on the abatement well sheds;

e. Site lighting.

7. External Factor Planning

Certain external factors will have some impact on the operations. Heavy rains will cause excessive runoff. Five sedimentation basins are in place to control runoff from active areas. Stormwater control channels and pipes are used to divert storm water to the basins. Heavy rains will not affect the normal receipt of waste or cause related operational problems.

In the case of a power outage, the Phase III leachate collection and conveyance system will continue to operate because it is a gravity system, Phase IV areas have a sump containment that is requires pumping. The ground water abatement wells will stop pumping. However, this should not affect the potential for offsite migration of contaminated ground water since ground water levels will not change significantly even without pump operations during the period of a few hours or even a day or two, which would be typical for a power outage. The gas flare system would shut down, and the main header valve would automatically close, which would prevent discharge of unburned gases from the gas collection system during the duration of the power outage. The autodialer would call out to inform the listed personnel of the power outage.

Heavy snows will greatly reduce the amount of waste disposed at the site. They also will temporarily limit the movement of equipment and personnel around the site. However, the landfill possesses the necessary heavy equipment needed to clear heavy snow from operating areas. This activity begins as soon as operators are able to arrive at the site. Heavy snows will not affect other operations.

Strikes are not a factor in emergency planning. Employees are not union.

8. Health, Safety and Employee Training

In order to protect the health and safety of operating personnel, the safety standards specified in this section are observed.

a. First Aid. The Landfill Manager or designate is responsible for informing all employees of the facility's first aid procedures. First aid kits are located and maintained in the main office, scalehouse, maintenance garage, and on the maintenance service truck.

b. Clothing. All operating personnel at the active areas of the landfill operation wear protective clothing and equipment. Operating personnel are issued a hard hat, protective clothing, foot protection, gloves, safety glasses, ear protection, respiratory protection (fitted) as applicable, and rain gear. The operating personnel are expected to wear protective clothing and shoes at all times on-site. Safety equipment (glasses, hard hat, and orange vest) is worn within the limits of the active disposal areas, except in the cab of the operating equipment. Ear protection and respiratory protection may be required when operating heavy equipment without a cab or when working around heavy equipment or dusty conditions for extended periods. Personnel are trained in proper use of any personal protective equipment. This is performed initially for each employee followed by annual refreshers.

c. Accident Records. A report is prepared by the appropriate supervisor for each significant mishap that occurs on the landfill site involving personal injury requiring medical attention to personnel or visitors and/or damage to equipment or facilities.

The accident records are maintained on a permanent basis in the Safety Manager's office to determine responsibility for accidents, to dispose of any claims, and to identify conditions that cause accidents.

d. Safety Training. All of the administrative and operating personnel are adequately trained in the operations of a sanitary landfill. The training is sufficient to ensure that the facility personnel are able to respond effectively to emergencies. IESI's Corporate Safety Manager and staff are responsible for developing and implementing a comprehensive safety program.

Safety rules and procedures are prepared in written form, and distributed to each employee. This program includes monthly safety meetings to educate and refresh employee awareness in all areas. This monthly structured safety plan was developed to provide uniform training nationally to educate employees on landfill safety related topics.

The elements of the program are contained in the IESI Bethlehem Landfill Written Hazard Communication Program as well as the Bethlehem Safety and Compliance Red Binder monthly safety training program.

D. COUNTERMEASURES

1. Countermeasures To Be Taken by Facility

In the event of a gas release from the gas flare station the following countermeasures are taken:

a. Gas feed to the station will be stopped, if practical and necessary (the automatic control system is designed to shut down the flare and close the main header valve.);

b. Thorough inspection of the equipment will be performed to determine the cause of the release;

c. Immediate repair of the faulty or damaged equipment.

In the event of a leachate spill to the environment the following countermeasures are taken:

a. Locate and stop the source of spill, if possible;

b. Contact the Emergency Coordinator or highest available authority on the chain of command;

c. Contain the spill with the use of soil by loaders or dozers, if possible, or any absorbents that may be available;

d. The use of outside vendors for clean-up and waste removal, as noted in Section D.2, may be necessary.

e. Notify the proper authorities as described in the List of Agencies to be Notified

In the event of a leachate spill within a leachate management chamber, the following countermeasures are taken:

a. Shut off the leachate flow upstream of the affected LMC;

b. Remove the leachate from the LMC into the landfill's tank truck or other mobile tank. The leachate may be reintroduced into the conveyance system at a downstream, unaffected location or transported either to the leachate storage tank on the site or directly to the City of Bethlehem Sewage Treatment Plant or City of Allentown Sewage Treatment Plant, which is the back-up leachate disposal facility;

c. Drain the piping needing repair and perform the necessary repair;

In the case of a leak in the leachate conveyance pipe, the following countermeasures are taken:

a. Shut off the leachate flow upstream of the leak;

b. Mobilize equipment for containment, if necessary, utilizing the facility's equipment or outside contractors as necessary;

c. Drain the piping needing repair and perform the necessary repairs;

d. Excavate any contaminated soil and arrange for their removal and disposal within the active disposal area of the landfill, if available, or other approved disposal facility;

e. Backfill any excavated areas with clean soils.

In the event that leachate cannot be conveyed to the Bethlehem Wastewater Treatment Plant due to problems with the conveyance system or plant, the following countermeasures are implemented:

a. The valves in LMC-9 and LMC-10 are adjusted to close the main valve which releases leachate to the downstream conveyance system and open the valve which diverts flow into the storage tank;

b. The valve on the drain line from the storm water inlet within the tank's containment area is closed so rainwater is contained within the containment area rather than being discharged to the storm sewer as occurs under normal conditions;

c. Unless the conveyance or treatment constraint is known to be a short-term limitation, a liquid waste hauler will be contacted and arrangements made for hauling leachate to the Allentown Wastewater Treatment Plant with which the landfill has a backup disposal agreement.

In the event that unknown wastes are encountered during excavation for construction of new landfill cells, DEP Wilkes-Barre Regional Office will be notified (570-826-2516) within 24 hours. The Waste Relocation Plan included in Attachment #5 will be utilized. A Waste Sampling Plan will be prepared, if necessary, to assess the characteristics of the suspect material and determine an appropriate means of disposal. The Waste Sampling Plan prepared in August 1999 in connection with the discovery of suspect wastes during excavation for Cell 3-D will be utilized as a guide.

In the event of fires at general or specific locations, the following procedure should be used as a guide, but in each case, best judgment should be used:

General Fire Procedures

a. The employee who discovers the fire should immediately notify the Emergency Coordinator as to the location and type of fire emergency;

b. The Emergency Coordinator should ensure that all other personnel are notified of the fire using the two-way communication system;

c. The Emergency Coordinator should notify the emergency agencies through 911, and communicate the following information:

- Location of fire,
- Type of fire,
- Name of caller, and
- Phone number used to call.

d. The Emergency Coordinator should notify all other persons, in order of the Chain of Command, of all pertinent information regarding the fire;

e. The Emergency Coordinator should see that the scalehouse personnel stop all waste vehicles from entering the landfill area until otherwise notified and maintain access around the scale for ingress of emergency vehicles.

Specific Fire Procedures

1. Fire in a Refuse Vehicle:

a. Follow above general fire procedures;

b. Attempt to remove the vehicle from open refuse area. Have the vehicle proceed to the nearest designated hot load area, and have the driver eject the load. At the hot load area, located adjacent to the working face, water from the on-site tank truck and stockpiled area shall be applied to the burning debris to control and contain the fire until the fire company arrives;

c. If the vehicle, not the refuse, is on fire and if the driver must evacuate the vehicle, a judgment should be made as to whether it is possible to control the fire until the fire company arrives. If not, the immediate area surrounding the burning vehicle should be evacuated.

2. Fire at the Working Face

   a. Remove all vehicles from the working face;

   b. With available dry chemical extinguishers, attempt to suppress the fire, then proceed to dig out burning refuse with available heavy equipment;

   c. Push (dig) burning refuse onto an isolated area with cover material, spread out, and use either water, dry chemical fire extinguishers, or cover material to extinguish the fire;

   d. If the fire is large, move the burning material out of the daily operating area and onto covered areas for containment. This can be accomplished with available equipment and extra cover material;

   e. If necessary, portable pumps may be used to convey water from the existing sediment basins or the stream located south of the basins to the fire areas. The water can be mixed with dirt or cover material and used to extinguish the fire. One of the major problems in all refuse fires is reflaring of smoldering fires. To prevent this, completely dig the smoldering refuse out of the landfill, mix with dirt, spread onto a covered area, and saturate with water.

3. Fire at the Public Drop Off Center

   a. Follow general fire procedures;

   b. If a fire in a rolloff container occurs, the fire should be at least partially extinguished by water or dry chemical extinguisher before moving the container to the hot load area. Once the material is dumped at the hot load area, the fire can be completely extinguished;

   c. If a fire occurs in a vehicle at the convenience center, follow instructions outlined in Fire in a Refuse Vehicle.

4. Fire in a Building

   a. Follow general fire procedures;

   b. Sound the fire alarm, if one exists. Evacuate the building and account for personnel;

c. Notify the fire department. If the fire is small, and smoke inhalation is not a concern, attempt to extinguish the fire with a nearby fire extinguisher.

2. Countermeasures To Be Undertaken By Contractors

The IESI Bethlehem Landfill can immediately notify the following outside contractors. For emergency liquid trucking and other emergency response work services, the IESI Bethlehem Landfill contacts CHEMTREC and/or TEEM Environmental of Old Forge, PA, Rapid Response Inc. Northampton, PA an environmental response contractor. Liquid trucking is also provided by Mobile Dredging & Pumping and/or Kline's Services. In the event that an infectious wastestream was found intermixed in a wastestream Stericycle would be contacted for clean-up transportation and disposal.

Joe Latona Contractor	570 -883-7300
TEEM Environmental	800-890-7745
Mobile Dredging & Pumping	800-635-9689
Stericycle	866-783-7422
Rapid Response Inc.	877-460-1038
Kline's Services	717-898-8158

3. Evacuation Plan for Facility Personnel

In the event of an emergency necessitating evacuation of the site, the Emergency Coordinator sounds a verbal alarm over the two-way radio system. All employees meet at a specified location, which will usually be in the stone parking area on the site immediately west of the main gate. If wind direction does not allow it, a different location will be specified over the radio. Once assembly has occurred, a roll call shall be taken to insure that everyone has safely left the site. In such an emergency, the police and fire company shall also be notified through the 911 systems. The evacuation routes are specified on the facility maps in Attachment # 2.

4. Emergency Equipment

The following list of emergency equipment will be maintained at the site:

EQUIPMENT DESCRIPTION	LOCATION	INTENDED USE
Absorbent Materials	Fuel Truck and Maintenance Shop	Fuel Spill Cleanup
Air Compressor	Maintenance Shop	--
PPE – TYVEK coveralls	Office – Maintenance Shop	PPE
Hard hat	Office – Maintenance Shop	PPE
Bulldozer	Maintenance Shop	Excavation
Camera	Office	Photos of emergency situation
Chain saw	Maintenance Shop	Emergency clearing
Fire Extinguishers	All equipment, Office, Maintenance Shop	Fire Extinguishing
First Aid Supplies	Maintenance Shop, Office, Scale, Maintenance Truck	First Aid
Fuel Supply (Diesel)	Outside Maintenance Shop	Diesel Fuel
Gas Detector	Office	Confined Space Entry/Other Gas Testing
Gloves	Office – Maintenance Shop	Hand Protection
Jacks	Maintenance Shop	Lift equipment
Lighting equipment, portable	Maintenance Shop or Fill Area	Light
Phones – Portable	District, Landfill & Compliance Manager	Emergency Notification
Phone System	Office, Scalehouse, Maintenance Shop	Emergency Notification
Radio	Equipment, Scalehouse, Office, Maintenance Shop	Communication
Respirators (full & ½ mask)	Office - Maintenance	Dust
Submersible Pump	Maintenance Shop	Pump water
Tank truck	Maintenance Area	Transport water/dust control
Tool box	Maintenance Shop	Tools
Water Truck	Maintenance Shop	Fire, Dust Control
Welding/cutting equipment	Maintenance Shop	Welding/Cutting

E. EMERGENCY SPILL CONTROL NETWORK

1. Arrangements with Local Emergency Response Agencies and Hospitals

The list of local emergency response agencies and hospitals is included in the following section.

2. Notification Lists

A complete list of agencies and phone numbers has been developed in the case of an emergency or spill. This list is described below.

The nearest hospital is St. Luke's Hospital, 801 Ostrum Street, Bethlehem, PA, located approximately 6 miles from the landfill. The phone number at the hospital is (610) 954-4000. Their emergency unit is available 7 days a week, 24 hours a day. The emergency phone number at the hospital is (610) 954-4500.

Directions to St. Luke's Hospital
(from the Landfill)

Turn right onto Applebutter Road
At stop sign, turn left onto Shimersville Road
At next stop sign, turn right onto Route 412
Follow Route 412 through Bethlehem
Continue on Route 412 until you reach Route 378
Proceed straight across Route 378 at the traffic light
Continue on Delaware Avenue for approximately 1 mile
Turn right onto St. Luke's Place Road
Hospital is straight ahead on Ostrum Street

In case of fire, personal injury, or leachate release to the environment, the following entities shall be contacted:

Fire, Police, and Ambulance (for emergencies)
911

City of Bethlehem Public Works (Sewage, Water)
Emergency Service: (610) 865-7074
Nights/Weekends/Holidays: (610) 865-7074

Northampton County Emergency Management Agency
(610) 759-2600

City of Bethlehem Wastewater Treatment Plant
(610) 865-7168

Agencies to be notified immediately by telephone under the following conditions:

In the event of solid waste fire, leachate release to the environment, or other emergency dealing with solid waste or the gas flare system:

DEP Bureau of Waste Management Wilkes-Barre Regional Office	(570) 826-2516 or (570) 826-2511
DEP Bureau of Waste Management Bethlehem District Office	(610) 861-2070

In the event of a leachate release to the environment or any emergency that causes or has the potential to cause ground or surface water contamination:

DEP Bureau of Waste Management Wilkes-Barre Regional Office	(570) 826-2516 or (570) 826-2511
U.S. Environmental Protection Agency Region III 165 Arch Street Philadelphia, PA 19106	(215) 597-9825

In the event of actual or potential contamination of surface waters:

PA Fish Commission Southeastern Regional Office PO Box 8 Elm, PA 17521	(717) 626-0228

In the event of a hazardous waste spill:

National Response Center Washington, DC	(800) 424-8802

Petroleum spills would also prompt implementation of the SPCC Plan and the notification procedures detailed within that plan.

3. Downstream Notification Requirement For Storage Tanks

The 390,000-gallon leachate storage tank was constructed with a berm and underlying synthetic liner for secondary containment purposes. The secondary containment is sufficient for controlling a spill should the leachate storage tank fail. For this reason it is not necessary to provide a downstream notification list.

F. STORM WATER MANAGEMENT PRACTICES

The IESI Bethlehem Landfill incorporates a storm water management system that isolates the active landfill working face from run-on and surface water drainage to reduce leachate generation and prevent contamination of surface water. This system is designed to divert surface water away from the landfill by the use of contoured land surfaces, collection pipes, stormwater channels and swales and to retain this water in five sedimentation basins prior to discharge.
Rainwater falling on the active portions of the landfill will infiltrate into the leachate collection system of the landfill. This will then be conveyed to the Bethlehem Wastewater Treatment Plant. Rainwater, which may contact the waste, does not flow to the storm water collection system.

The Landfill design also incorporates a final capping system consisting of a synthetic liner and drainage layer plus two feet of vegetative soil on the surface of each completed pad to significantly reduce leachate generation.

G. SEDIMENT AND EROSION PREVENTION

Any area of the landfill property undergoing development is subject to potential erosion of soil. When a new pad area is initially excavated and/or prepared, soil may be exposed for an extended period prior to construction of the liner system and elimination of potential erosion. The final step in preparation of the soil base is compaction. This alone will retard erosive effects. In addition, silt fencing and staked hay or straw bales are placed along the toe of slopes, in temporary drainage swales and around drainage pipe and catch basin inlets.

Portions of the landfill where waste is actively being placed are subject to potential erosion. As waste is placed it is covered with six inches of soil at the end of each day. Since this cover material changes on a daily basis, effective erosion control is difficult. Eroded soil is primarily prevented from leaving the confines of the active area by the local contours. Side slopes of the active areas, which will not receive additional cover for some time, are seeded and covered with mulch to stabilize the area. Swales between active areas and areas with intermediate soil cover are formed into rip-rap channels to divert run-off away from the active portions.

Closed portions of the landfill are constructed using synthetic cap with a final 24 inches of soil cover. This is stabilized from erosion by producing a final vegetation cover . If erosion develops before vegetation becomes established, the damage is repaired and revegetated. Slopes are terraced at regular

intervals to form a drain swale that allows water to flow to a series of down drains. Run-off from the side slopes and the down drains is conveyed by swales covered with rip-rap. These swales channel water to sedimentation basins.

The landfill operates a soil borrow area to obtain soil for covering the waste. Soil is always exposed to run-off. IESI uses portable erosion & sedimentation controls such as silt fencing. As an additional control measure, the entire area drains to Sedimentation Basins. These basins capture all run-off from the borrow areas and allow silt to settle out prior to discharge of the water through the stand pipe.

H. ADDITIONAL REQUIREMENTS FOR SARA III, SECTION 313 FACILITIES

This facility possesses chemicals regulated by SARA Title III, Section 313 and files annual reports as required.

I. CERTIFICATION FOR NON-STORM WATER DISCHARGES

This certifies that the IESI Bethlehem Landfill does not discharge non-storm waters to the storm water collection and discharge system. The landfill can verify the above based on the configuration of the leachate collection system and storm water management pipes, channels, and basins. The discharge from each of the five sedimentation basins is sampled semi-annually with the results reported to PADEP

The only non-storm water discharge is from the leachate collection system. Leachate generated on site is conveyed to the City of Bethlehem WWTP.

J. CONFINED SPACE ENTRY

Because there is occasionally a need for personnel to enter confined spaces such as manholes or leachate management chambers, a confined space entry program has been developed by the landfill. The procedure is followed whenever someone enters a confined space on IESI Bethlehem Landfill property. Certified outside contractors are used for all confined space entry work.

K. Revisions to the Plan

June 2008:
1. Inclusion of the PEPCO Bethlehem Renewable Energy Facility information.
2. Update to site conditions; office and scale relocation. New Attachment #2
3. Name and phone change for Safety/TCO; Jared Stevulak to Keith Overcash.
4. Add Rapid Response Inc. to emergency list.

Feb 2010.
1. Update emergency equipment type and location
2. Update Material Inventory

June 2010
1. Add Stericycle to the emergency contact list
2. Add Joe Latona Contractor for emergency contact for heavy equipment
3. Update material storage capacity

~~Feb 2012~~
1. ~~Eliminate reference to Basin #7~~
2. Remove reference to Site Supervisor Gene Bonomo
3. Update facility site information
4. Add Kline's Services

June 2014
1. Remove reference to Keith Overcash
2. Add Mike Shelden, Operations Manager

(d) a brief description of the incident, nature and quantity of materials or wastes involved, extent of any injuries, and possible hazards to public health, welfare and the environment that exist or may occur;

(e) the nature of injuries, if applicable, and;

(f) procedures implemented to alleviate the emergency.

As noted above, the District Manager shall contact (if required) the Pennsylvania Emergency Response Commission (PERC), the Northampton County Emergency Management Agency (NCEMA), the PA Department of Environmental Protection (PADEP) and the National Response Center (NRC). The Pennsylvania Emergency Management Agency (PEMA) and the Northampton County Emergency Management Agency are the operational agencies, respectively.

2. Facility Emergency Coordinators

The following individuals are available on-site or on-call with the authority to implement emergency response procedures:

a. Primary Emergency Coordinators:
District Manager
Sam Donato
IESI PA Bethlehem Landfill Corp.
2335 Applebutter Rd.
Bethlehem, PA 18015
Work: 610-317-3200
Mobile: 610-554-5082

b. Secondary Emergency Coordinator:
Compliance Manager
Allen Schleyer
IESI PA Bethlehem Landfill Corp.
2335 Applebutter Rd.
Bethlehem, PA 18015
Work: 610-317-3200
Mobile: 484-357-3135
610-360-0470

c. Operations Manager
Mike Shelden
IESI PA Bethlehem Landfill Corp.
2335 Applebutter Road
Bethlehem, PA 18015
Work: 610-317-3200
Mobile: 484-357-2479

The emergency coordinators listed above are reachable at the landfill office during operating hours or through their home or mobile phone numbers during non-operating hours. The chain of command will be properly updated when new personnel fill these positions.

3. Duties and Responsibilities of the Coordinator

The Emergency Coordinator or authorized IESI Bethlehem Landfill employee will contact the following agencies as appropriate in the case of an emergency:

Agency/Personnel	Telephone Number
Police – Fire – Ambulance Emergency	911
Pennsylvania Emergency Management Agency (PEMA)	1-800-372-7362
Northampton County Emergency Management Agency	610-759-2600
National Response Center	800-424-8802
CHEMTREC	800-424-9300
TEEM Environmental	800-890-7745
Stericycle	866-783-7422 or 610-286-6996
PADEP Emergency Number	866-852-0208
PADEP Bethlehem District Office	610-861-2070
Lower Saucon Township	610-865-3291
EPA 24 Hour Number	215-597-9898
PA Fish Commission	717-626-0228
PA State Police - Bethlehem	610-861-2026
Mobile Dredging & Pumping	800-635-9689
Joe Latona Contractor	570-883-7300
Bethlehem Sewage Treatment Plant	610-865-7168
Rapid Response Inc.	877-460-1038
PEPCO – Bethlehem Renewable Energy	484-651-3822 / 410-274-9520
Kline's Services	717-898-8158

The emergency response procedures and remedial activities will be administered and directed by the Emergency Coordinator assigned by the appropriate agency.

If the facility stops operations in response to a fire, explosion, emission, or discharge, the Emergency Coordinator must ensure that adequate monitoring is conducted for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

Immediately after an emergency, the Emergency Coordinator, with PADEP approval, must provide for treating, storing, or disposing of residues, contaminated soil, etc. from an emission discharge, fire, or explosion at the installation. Public responders and facility personnel, under the direction of the Emergency Coordinator shall take remedial measures as required to address the situation.

The Emergency Coordinator must ensure that in the affected areas on the installation, no material or waste incompatible with the emitted or discharged residue is processed, stored, treated, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the plan is cleaned and fit for its intended use before operations are resumed.

Within 5 working days of the incident, the installation must submit a written report on the incident to the PADEP, Lower Saucon Township and the City of Bethlehem Wastewater Treatment Facility of the effect if the incident has extended or is likely to extend off-site or if aid is required from outside agencies to mitigate the incident. The report must include the following:

a. name, address and telephone number of person filing the report;

b. name, address and telephone number of the installation;

c. the date, time and location of the incident;

d. a detailed description of the incident;

e. a description of type and quantity of materials involved;

f. an assessment of any contamination of land, water or air that has occurred due to the incident;

g. estimated quantity and disposition of recovered materials or waste that resulted from the incident;

h. and a description of what actions the installation intends to take to prevent a similar occurrence in the future.

4. Chain of Command

Sam Donato – District Manager

Allen Schleyer– Compliance Manager

Mike Shelden – Operations Manager

C. SPILL/LEAK PREVENTION AND RESPONSE

1. Pre-Release Planning

There are five main areas at the IESI Bethlehem Landfill where potential spills and/or leaks may occur. These areas are: the equipment storage/maintenance garage area, landfill working pad, landfill side slopes, gas flare station, and leachate piping system including leachate management chambers. These areas are shown on Attachment #2.

Equipment Storage/Maintenance Garage Area

Spills that could occur in the equipment storage area would be of a relatively minor volume, primarily associated with small equipment leaks or spills and would be handled as outlined in the Housekeeping Program section of this Plan. A spill in this area during precipitation could result in some spilled liquid being carried off by storm water. Materials would be of relatively low toxicity and would be in the form of oil or fuels. Pollutants carried by storm water would flow to Sedimentation Trap A where containment can be effected.

Landfill Working Pad

Most spills that could occur on the working pad would also be of minor volume and would be handled as above. However, the potential exists for a significant amount of fuel to be released from the pad equipment or from hauling vehicles. Absorbent material is available to absorb the fuel and an attempt will be made to collect leakage in containers before it contacts the ground.

It is possible that an unpermitted waste could be received in a mixed municipal or approved residual waste load. In general, the Weighmaster and/or Compliance Manager at the scalehouse will turn unapproved waste away from the site upon review. However, if unapproved waste is tipped onto the working area of the landfill, with few exceptions, it will be loaded back into the hauling vehicle for removal from the site by the hauler. The procedure for how to handle unacceptable waste is addressed in Attachment #4.

Spills on the working area during rain may be carried away from the spill site. However, the working areas of the landfill are completely contained within the landfill leachate collection system. Pollutants would not enter the environment especially via storm water discharge.

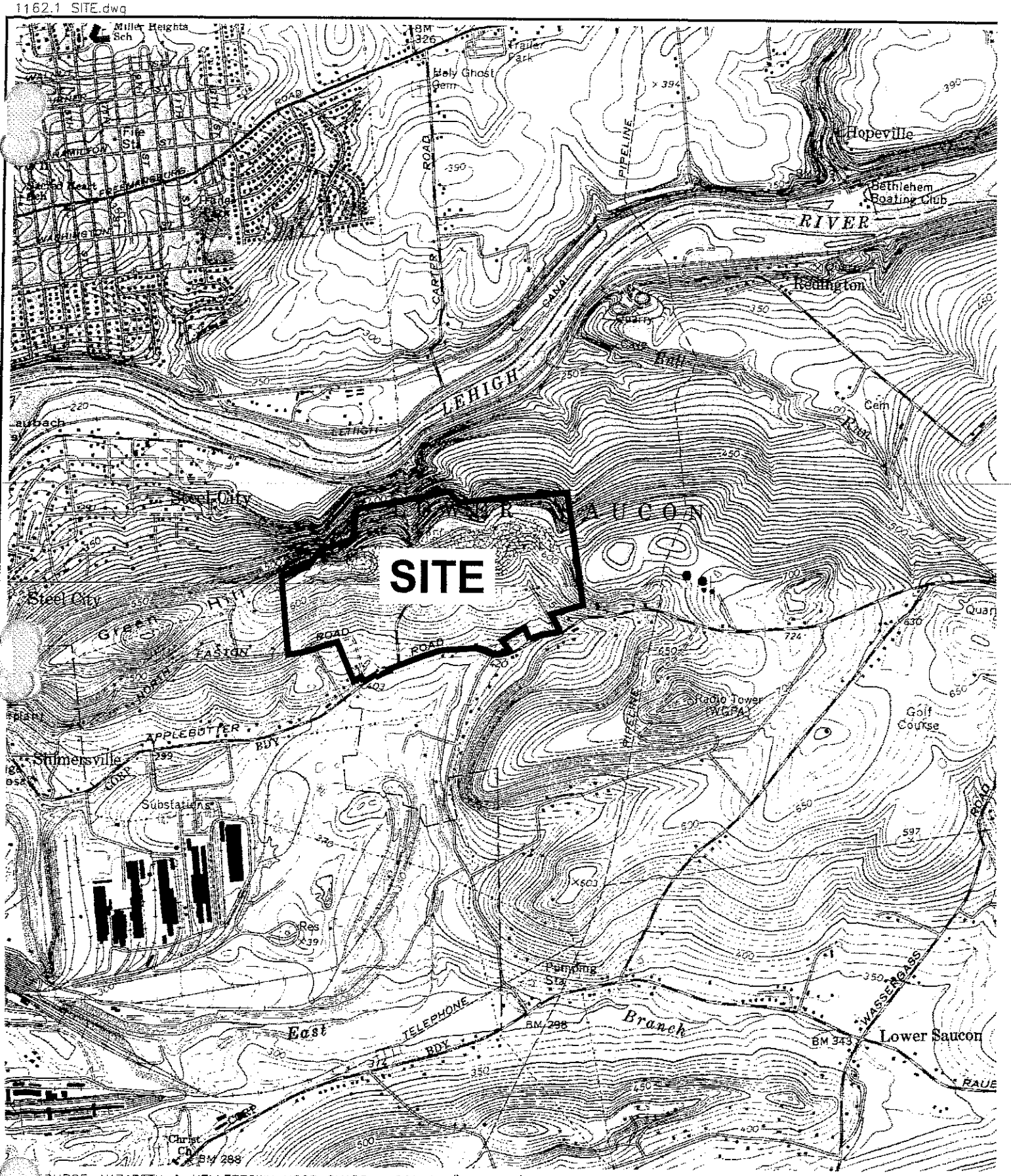
PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN
(PPC PLAN)

ATTACHMENT #1

SITE LOCATION MAP

IESI PA BETHLEHEM LANDFILL CORPORATION
NORTHAMPTON COUNTY, PENNSYLVANIA

1162.1 SITE.dwg



SOURCE: NAZARETH & HELLERTOWN USGS QUADS SCALE: 1" = 2000'

martin and martin incorporated
37 south main street • suite A
chambersburg, pennsylvania . 17201
Phone: (717) 264-6759

\\Autocad41\

SITE MAP

LOWER SAUCON TWP

NORTHAMPTON CO

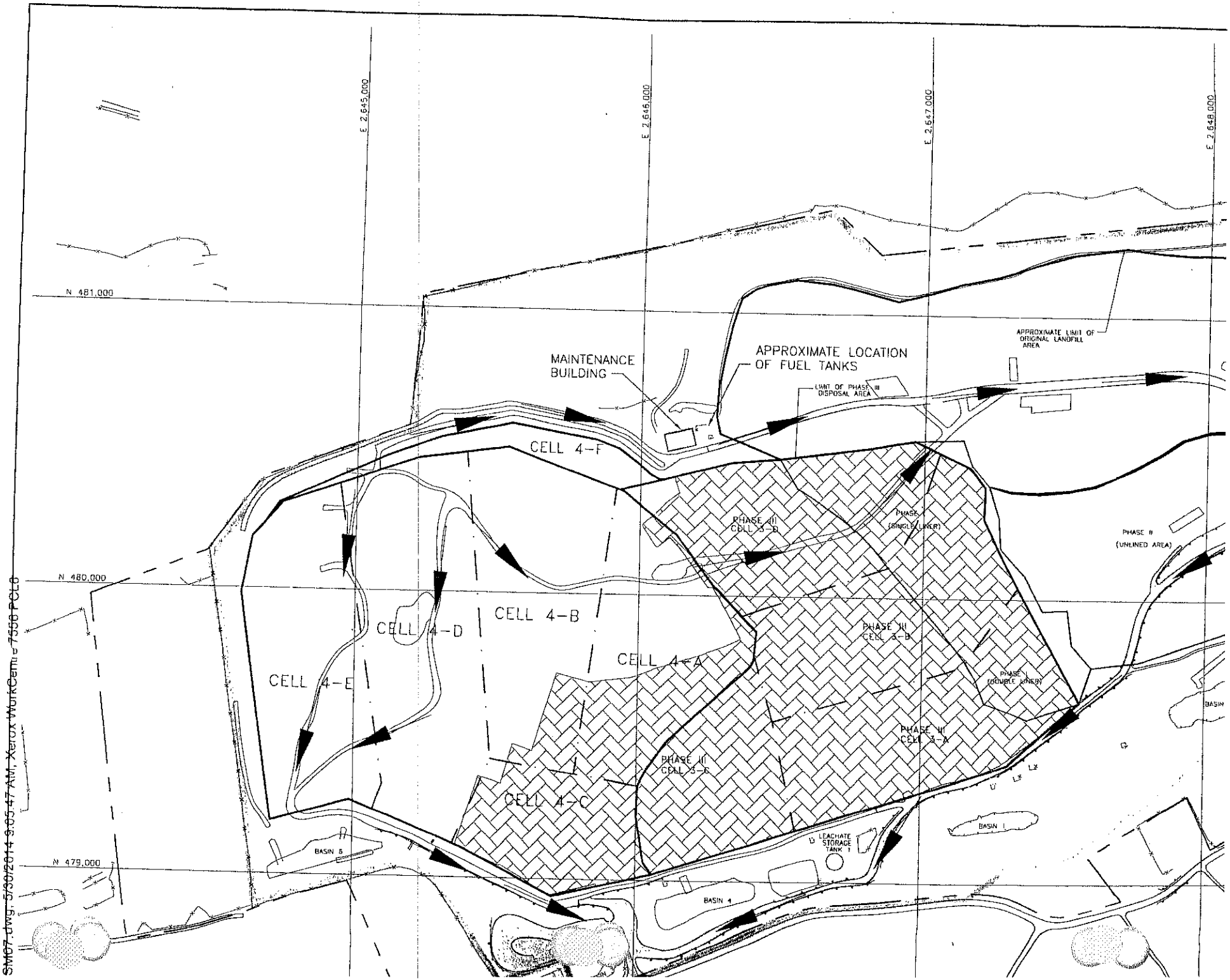
PA Bethlehem Landfill Corp.

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN
(PPC PLAN)

ATTACHMENT #2

GENERAL SITE PLAN
EVACUATION ROUTE

IESI PA BETHLEHEM LANDFILL CORPORATION
NORTHAMPTON COUNTY, PENNSYLVANIA



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PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN
(PPC PLAN)

ATTACHMENT #3

MATERIAL INVENTORY

IESI PA BETHLEHEM LANDFILL CORPORATION
NORTHAMPTON COUNTY, PENNSYLVANIA

IESI
Bethlehem Landfill

Attachment #3
Material Inventory List

CHEMICAL NAME	CONTAINER TYPE	STORAGE LOCATION	MAX. VOLUME ON-SITE
Antifreeze	245 gallon	Maintenance Bldg.	245 gal
Transmission Fluid	275 gallon	Maintenance Bldg.	275 gal
Motor Oil	275 gallon	Maintenance Bldg.	275 gal
Hydraulic Oil	275 gallon	Maintenance Bldg.	275gal
Castrol Parts Cleaner	55 gallon	Maintenance Bldg.	55 gal
Motor Oil (diesel)	55 gallon	Maintenance Bldg.	55 gal
Hydraulic Fluid (Volvo)	55 gallon	Maintenance Bldg.	55 gal
Lube Oil (varius)	5 gallon pail	Maintenance Bldg.	25 gal
Gear Lube (grease)	55 gallon	Maintenance Bldg.	55 gal
Acetylene	gas bottle (1)	Maintenance Bldg.	2 bottles
Oxygen	gas bottle (2)	Maintenance Bldg.	2 bottles
Paints	Spray can - gallon	Maintenance Bldg.	Flam Cabinet 10 gal
Argon/CO2	gas bottle (1)	Maintenance Bldg.	1 bottle
Various Cleaners	<16 oz spray cans	Maintenance Bldg.	25 cans/ Cabinet
Waste Oil	1,000 gallon	Outside Maintenance Bldg.	Heater fuel 1,000 gallons
Propane	20 lb tank	Maintenance Bldg.	20 lb tank
Diesel Fuel	300 gallon	Outside Maint. Bldg.	Gen. Fuel 300 gallons
Gasoline	500 gallon	Outside Maint. Bldg.	500 gallons
Diesel Fuel (fuel truck)	3,000 gallon	Outside Maint. Bldg.	3,000 gallons
Used Anti-freeze	245 gallon	Outside Maintenance Bldg.	245 gallon
Cleaners	spray cans - gallons	Maint. Building	shelving
Nitrogen	90 lb gas bottle	Flare	5 (90 LB) & 2 (35LB)
Propane	300 lb gas bottle	Flare	1 (300 lb) and 1 (90 lb)
Bearing Oil	1 gallon	Flare	1 gallon
Landfill Deodorizer	55 gallon	Maintenance Bldg.	55 gallon

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN
(PPC PLAN)

ATTACHMENT #4

WASTE RELOCATION PLAN

IESI PA BETHLEHEM LANDFILL CORPORATION
NORTHAMPTON COUNTY, PENNSYLVANIA

ATTACHMENT 4

IESI BETHLEHEM LANDFILL

Waste Relocation Procedures

PART 1 - GENERAL PROCEDURES

LITTER CONTROL

The necessary litter fences will be constructed and placed to ensure positive control of litter from the excavated refuse. The excavated area litter should not be a problem during the trucking or pushing of refuse. It should have the consistency of a mulch rather than freshly disposed of trash. Should the consistency change, the appropriate action will be taken. Litter will be removed from the fences weekly, or more frequently as necessary.

DUST CONTROL

During dry, dusty periods of the year, and at any time when required, a water truck will be utilized to apply water to any areas which are generating dust.

ODOR MANAGEMENT

Whenever possible, waste relocation operations will be carried out in the period from October 15 to April 15. This should help minimize odor problems in 2 ways; first, the cooler weather appears to reduce odors; secondly, the exposed refuse will be covered with soil and or tarps to contain odors. If, during other time frames, and at any time, odors do become a problem, odor suppressants, lime or other controls will be applied. Odors will be monitored by daily "odor checks" at the working face and the site perimeter by landfill personnel. If any odors are detected at or near the site perimeter, the landfill shall immediately address it, indicating in the log the location and the steps taken to control the odors. Any such occurrences shall be noted in the landfill's daily operations log.

NOISE

The relocation of trash will be generally limited to the operating hours of the facility per the permit, and will be consistent with the landfill ordinance of Lower Saucon Township. The noise associated with this activity will be consistent with other operations on site.

LEACHATE MANAGEMENT

The leachate pockets or seeps found during the trash removal and relocation to the lined pads will be handled through the site's leachate collection system. Precautions will be taken to ensure that no leachate will flow or migrate from the working area. IESI Bethlehem Landfill or its contractors will use the equipment on site to ensure there is no migration. If necessary to contain leachate, a pit or sump will be dug at the active face of each relocation area, from which leachate will be pumped into a tank truck for hauling to the leachate collection system. The pit will either be a concrete sump or be membrane lined, as may be necessary.

STORMWATER MANAGEMENT

The stormwater runoff will be diverted around the working face of all pads and refuse removal areas under construction. Precautions will be taken to ensure there is not runoff from areas outside the working area infiltrating into exposed trash.

TRAFFIC

Waste relocation procedures will proceed by the hauling of refuse from the relocation areas to the lined pads. This traffic will not be directed to the scale area, nor will it utilize the access roads or public roads. Therefore, traffic should not be a problem at the site. In order to accommodate the additional volume of activity at the working face, an additional compactor, and truck for delivery of cover material may be utilized.

SCHEDULE OF RELOCATION

The schedule for relocation of the old trash will coincide with the earthwork schedule necessary to prepare subsequent pads for construction.

PART 2 - EXECUTION

2.01 HEALTH AND SAFETY REQUIREMENTS

A. Project personnel shall become thoroughly familiar with and follow the Waste Relocation Plan.

B. The Project Manager for the projects will be IESI Bethlehem Landfill.

C. Project management will be the responsibility of the Project Manager. The Project Manager will coordinate and manage all major activities. Day to day activities will be coordinated and managed as directed by the Project Manager. The CONTRACTOR should be in constant communication with the Project Manager.

D. The CONTRACTOR will work closely with the Project Manager to assure that all work is carried out in the safest manner possible. The CONTRACTOR will be responsible for assuring the overall implementation and enforcement of the plan, air monitoring, accident or incident investigation/reporting, contractor/employee compliance, and similar activities.

E. The CONTRACTOR and his workers must be knowledgeable about hazards to which they may be exposed during this project, as required by the OSHA Hazard Communication (HAZ-COM) Standards and the OSHA Hazardous Waste Operations and Emergency Response Standard. All OSHA, and other applicable regulations shall be followed by CONTRACTOR.

F. All on-site personnel, if required to wear respirators, will be fit tested and instructed in the proper use, cleaning, storage and limitations of their respirators.

G. All CONTRACTOR's personnel shall adhere to the safety practices for their respective specialties. Workers shall also exercise caution when working in adverse weather, on rough or slippery terrain, when operating on or around machinery and when vision and mobility are impaired due to the use of protective gear. The integrity of protective clothing shall be maintained and workers shall realize the increased difficulty in communicating when wearing a respirator (if its use is necessary). The following shall also be noted:

1. In unknown situations, always assume the worst and plan responses accordingly.

2. Use the buddy system; establish and maintain communication by use of hand signals, radios or other means as necessary.

3. Minimize contact with excavated or other potentially hazardous materials or liquids. Do not place equipment on tanks, drums or on the ground. Never sit or climb on tanks, drums or other vessels and containers.

4. Use disposable protective items when possible to minimize risks during work.

5. Smoking, eating and drinking are not allowed after entering the work zone and before personal decontamination.

6. Work breaks should be planned to prevent stress related accidents, fatigue or hot/cold environments.

7. Workers shall review and follow all site specific rules such as those dealing with the use of personal safety equipment (safety glasses), the use of climbing devices (ladders), sign in/sign out procedures, access, etc.

8. Conflicting situations between work requirements and safety procedures must be resolved by the CONTRACTOR and OWNER.

9. Unauthorized breaches of specified safety protocol will not be allowed. Personnel unwilling to comply with established safety procedures will not be allowed to continue to work at the site.

10. Be observant of the surroundings and also of others. Extra precautions are necessary when using protective gear due to reduced vision and hearing.

11. Use of contact lenses by workers are not allowed during any activities.

12. The wearing of a respirator will require the removal of all facial hair except small mustaches that are within the sealing surface of the respirator.

13. Changes in contingency plans will be posted to notify all personnel of any modifications to safety protocol related to changing site conditions.

14. When in doubt, withdrawal and re-assessment is the preferred course of action when encountering any potentially hazardous situation.

15. Be aware that chemical contaminants may mimic or enhance symptoms of other illnesses or intoxication.

16. The CONTRACTOR will maintain a daily log of meetings, facts, incidents, data, etc. relating to the project. Records will remain at the site during the duration of the project.

17. Observance of applicable OSHA, EPA and general good safety, health and specific equipment use practices is mandatory.

H. It is anticipated that all work will be performed using Level D personnel protective equipment as described below. Level D personnel protective equipment consists of the following unless otherwise recommended by the CONTRACTOR and approved by the OWNER.

1. Coveralls (disposable coveralls may be desirable);
2. Safety boots or substantial shoes/boots (as applicable);
3. Safety glass or goggles;

4. Hard hat and,
5. Work gloves

2.02 ODOR CONTROL

A. In the decomposition of solid waste, gases are produced creating possible pungent odors when exposed to the ambient air. The CONTRACTOR shall maintain safe working conditions in the presence of the gases and minimize odors migrating off-site which will cause public concern. Odor control from the project is critical.

B. The CONTRACTOR shall employ methods of odor control that must include, but not be limited to, the following:

1. Minimize the exposed area of refuse during relocation operations;
2. Apply cover (tarps, foam, and appropriate thickness of cover material, etc.) over any exposed trash at the end of each day and during project delays;
3. The use of odor suppressants. At least two "foggers" or equivalent (e.g. sprayer on arm of trackhoe) must be provided by the CONTRACTOR. The foggers must be strategically placed and used as directed by the OWNER.
4. The placement of lime on odor producing areas.

C. Based on previous projects, all soil needed for cover should be available from the relocation area by the stripping/re-use procedure. Any additional soil material needed must be taken from the soil stockpile as directed by the OWNER.

2.03 LEACHATE/STORMWATER MANAGEMENT

A. In general, the CONTRACTOR shall:

1. Collect all leachate in the refuse excavation area in such a manner as not to endanger public health, property or any portion of the work under construction or completed. The collected leachate must be pumped and/or transported to the tie-in point provided by the OWNER. Stormwater must be routed to the appropriate Sediment Basin.

2. The CONTRACTOR must provide and maintain pumps, sumps, suction and suitable discharge lines, temporary storage and other dewatering system components necessary to convey leachate away from any excavation, as approved by OWNER.

3. Prior to beginning refuse relocation excavation activities, make visual observations or utilize survey data to establish a method of routing stormwater from the work areas to the Sediment Basin and containing leachate within to be reviewed for approval by the OWNER. Earthen dikes may be constructed surrounding the work area, and located to minimize the area inside the dikes, thus reducing potential leachate generation. The area immediately outside the dike will be sloped away from the dike to direct stormwater away from exposed refuse to the site stormwater management system and appropriate Sediment Basin.

4. Maintain, at all times, proper and effective sedimentation and erosion control around the Refuse Excavation Area and the Soil Stockpile Area as approved by State and Local Authorities. This shall include, but not be limited to placement of silt fencing and/or other means of silt retention during construction, containment of all excavations and stockpiles, directing, and channeling of all stormwater to Sediment Basins, and all other methods to prevent silty run-off from reaching a receiving water course.

2.04 LITTER CONTROL

A. The uncovering of the existing refuse may cause litter to be blown away from the working area. The CONTRACTOR shall use litter fences and/or windscreens downwind of the immediate work area to contain blowing litter for pick-up and disposal.

B. A temporary cover shall be placed over exposed waste to prevent blowing litter as well as minimize odors. As indicated previously, cover (tarps, foam, an appropriate thickness of cover material, etc.) shall minimally be placed over all exposed waste at the end of each operating day.

C. Litter may also be scattered during on site transportation of the refuse to the new landfill Pad(s). If this does occur, the CONTRACTOR shall construct additional litter fences or cover the loads. The CONTRACTOR will be responsible for continuously policing the roadway to control litter.

D. Any refuse which is blown, tracked, etc. away from the working area must be collected by the CONTRACTOR by the end of each day and disposed in the active Pad(s) or another location approved by the OWNER.

2.05 "SUSPECT" MATERIAL ENCOUNTERED DURING REFUSE EXCAVATION

A. Due to the inherent nature of excavating old refuse, the CONTRACTOR shall be constantly aware of the potential for encountering, not only leachate, but special wastes termed "suspect" materials which may need special consideration for handling and disposal. "Suspect" materials may include, but not be limited to, containers or drums (crushed or whole), liquids or leachate, strange-shaped or typically industrially generated items, uncommon odors, significant levels of volatile organic compounds (VOC's) detected by instrumentation, soil uncommon to a sanitary landfill, powders, or material that looks like it could be an asbestos containing material (e.g., transit board, asbestos roofing or shingles, or pipe lagging).

B. If the CONTRACTOR unearths "suspect" material, appropriate personal protective equipment must be utilized assuming the worst case scenario. The OWNER's representative shall be notified immediately. The OWNER will notify the PADEP Wilkes-Barre Regional Office within 24 hours.

C. Upon encountering "suspect" material, the area in question shall be initially assessed by the OWNER. If the area is large, it may be cordoned off and prepared for on site sampling. Dikes shall be formed around the area as appropriate to prevent infiltration of leachate of contamination of other fill by the "suspect" material. If the area is small, isolated and in the way of progress, the material shall be placed in a container for further evaluation and sampling.

D. "Suspect" materials will be evaluated and handled as necessary. The CONTRACTOR may be directed to place "suspect" wastes in the appropriate containers or cordon off the area. Sampling, testing and evaluating the "suspect" material may be performed by the OWNER. If the "suspect" materials must be disposed off-site, the transportation and disposal costs will be the responsibility of the OWNER. If the "suspect" material may be disposed of on-site, the CONTRACTOR will relocate the waste in accordance with these Technical Specifications. No additional compensation will be paid for material disposed on-site.

PA Bethlehem Landfill
2335 Applebutter Road
Bethlehem, PA 18015-6004

INCIDENT REPORT

DATE: _____ **COMPANY:** _____

TIME: _____ **DRIVER:** _____

LOCATION OF INCIDENT: _____

_____

DESCRIPTION OF INCIDENT:

_____

_____

_____

_____

_____

_____

_____

FOLLOW UP ACTION TAKEN: _____

_____

_____

_____

COMMENTS: _____

_____

_____

PERSON REPORTING: _____ TITLE: _____

SITE MANAGER REVIEW: _____

DRIVER SIGNATURE: _____

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN
(PPC PLAN)

ATTACHMENT #5

WASTE REJECTION PROCEDURES

IESI PA BETHLEHEM LANDFILL CORPORATION
NORTHAMPTON COUNTY, PENNSYLVANIA

ATTACHMENT 5

IESI BETHLEHEM LANDFILL

Waste Rejection Procedure

PART 1 - GENERAL PROCEDURES

SCALEHOUSE

The first area that waste screening takes place once a load comes on site is at the scalehouse. The scale attendant is responsible for checking with the driver of each load to find out what the load consists of. If the material consists of asbestos, residual waste or contaminated soil a manifest is required to be given to the scale house prior to disposal. In addition outside of the scale house is an observation deck that is used to visually screen the load.

If after reviewing the manifest and visually inspecting the load, it is determined that the waste is unacceptable for disposal, the compliance manager and/or landfill manager need to be contacted immediately.

LANDFILL WORKING FACE

The equipment operators and spotters routinely observe the waste as it is dumped from the transporters truck onto the floor of the working face. If the equipment operator or spotter observes waste that is unacceptable for disposal at the facility they will not cover the waste and immediately contact the scalehouse and the landfill manager and/or compliance manager.

Considering that the material has most probably been unloaded by the time it is found unacceptable at the working face alternative measures must be followed. The material must remain segregated from the rest of the incoming trash and proper disposal of the material must be arranged for.

PART 2 – REPORTING

Upon spotting unacceptable waste the scale attendant, equipment operator or spotter is to immediately notify the compliance manager and/or landfill manager. After which a waste rejection form needs to be completed and the event needs to be noted on the daily operation log. The generator, DEP and Township are also to be immediately contacted by telephone to alert them to the unacceptable waste.

After cleanup an incident report needs to be submitted to the DEP and Lower Saucon Township following the procedures noted in the notification procedure of the PPC Plan.

PART 3 – CLEANUP

If an unacceptable wastestream is found after the load has been deposited onto the floor of the working face a cleanup effort will need to take place. An example of this type of situation would be a municipal waste load that has unloaded and an equipment operator spots red biohazard bags present amongst the waste. The load is to be visually inspected, not handled to prevent injury. The hauler will be retained onsite to find out who the generator of the material is. Once the generator is found they will be immediately contacted.

Once this material is deposited onto the working face of the landfill site personnel will take responsibility to ensure that the material is properly handled during the cleanup effort. The material will be segregated from the rest of the waste and the proper personnel will be contacted to handle the material. For example if this material is determined to be a hazardous waste then an environmental cleanup contractor needs to be contacted and if it is an infectious waste then a licensed infectious waste hauler needs to be contacted. Please see the notification list in Section B.3. of the PPC Plan.

WASTE ACCEPTANCE CRITERIA
IESI BETHLEHEM LANDFILL

Type of Analysis	Parameter		Maximum Value	Basis
SW 846, Method 1010 or 1020	CHARACTERISTIC OF IGNITABILITY		Non-Ignitable (>140F)	1
SW 846, METHOD 1110	CHARACTERISTIC OF CORROSIVITY		3.3 cpHc12.5	1
REACTIVE SULFIDE	CHARACTERISTIC OF REACTIVITY		<500mg H2S/kg (EPA Action Level)	1
REACTIVE CYANIDE	CHARACTERISTIC OF REACTIVITY		<250 mg HCN/kg (EPA Action Level	1
TCLP	CHARACTERISTIC OF TOXICITY			
	Metals			
	Arsenic	< or =	3.75 mg/l	4
	Barium	< or =	75.0 mg/l	4
	Cadmium	< or =	0.75 mg/l	4
	Chromium	< or =	3.75 mg/l	4
	Lead	< or =	3.75 mg/l	4
	Mercury	< or =	0.10 mg/l	3
	Selenium	< or =	0.75 mg/l	4
	Silver	<	3.75 mg/l	4
	Volatile Organics			
	Benzene	< or =	0.375 mg/l	4
	Carbon tetrachloride	< or =	0.375 mg/l	4
	Chloroform	< or =	4.5 mg/l	4
	1,2-Dichloroethane	< or =	0.375 mg/l	4
	1,1-Dichloroethylene	< or =	0.525 mg/l	4
	Methyl ethyl ketone	< or =	150.0 mg/l	4
	Pyridine	< or =	3.75 mg/l	4
	Tetrachloroethylene	< or =	0.525 mg/l	4
	Trichloroethylene	< or =	0.375 mg/l	4
	Vinyl chloride	< or =	0.15 mg/l	4
	Chlorobenzene	< or =	75.0 mg/l	4
	Semi-Volatile Organics			
	Cresol	< or =	150.0 mg/l	5
	o-Cresol	< or =	150.0 mg/l	4
	m-Cresol	< or =	150.0 mg/l	4
	p-Cresol	< or =	150.0 mg/l	4
	1,4-Dichlorobenzene	< or =	5.625 mg/l	4
	2,4-Dinitrotoluene	< or =	0.0975 mg/l	4
	Hexachlorobenzene	< or =	0.0975 mg/l	4
	Hexachloro-1,3-butadiene	< or =	0.375 mg/l	4
	Hexachloroethane	< or =	2.25 mg/l	4
	Nitrobenzene	< or =	1.5 mg/l	4
	Pentachlorophenol	< or =	75.0 mg/l	4
	2,4,5-Trichlorophenol	< or =	300.0 mg/l	4
	2,4,6-Trichlorophenol	< or =	1.5 mg/l	4
	Herbicides/Pesticides			
	Chlordane	< or =	0.0225 mg/l	4
	Endrin	< or =	0.015 mg/l	4
	Heptachlor	< or =	0.006 mg/l	4
	Lindane	< or =	0.3 mg/l	4
	Methoxychlor	< or =	7.5 mg/l	4
	Toxaphene	< or =	0.375 mg/l	4
	2,4-D	< or =	7.5 mg/l	4
	2,4,5-TP (Silvex)	< or =	0.75 mg/l	4

WASTE ACCEPTANCE CRITERIA
IESI BETHLEHEM LANDFILL

Type of Analysis	Parameter		Maximum Value	Basis
TCLP	NON-CHARACTERISTIC METALS			
	Aluminum	<	10,000 mg/l	2
	Antimony	< or =	50 mg/l	6
	Beryllium	< or =	0.50 mg/l	6
	Boron	<	10,000 mg/l	2
	Copper	<	103.5 mg/l	3
	Iron	< or =	10,000 mg/l	2
	Manganese	< or =	10,000 mg/l	2
	Molybdenum	< or =	10,000 mg/l	2
	Nickel	<	113 mg/l	3
	Tin	<	10,000 mg/l	2
	Titanium	<	10,000 mg/l	2
	Thallium	< or =	10 mg/l	6
	Zinc	<	74 mg/l	3
TCLP	NON-CHARACTERISTIC HYDROCARBONS			
	Aromatic Halogenated	<	1,000 mg/l	2 (I)
	Aliphatic Halogenated	<	1,000 mg/l	2 (I)
	Aromatic	<	10,000 mg/l	2 (I)
	Aliphatic	<	10,000 mg/l	2 (I)
ASTM WATER LEACHING PROCEDURE	MISCELLANEOUS			
	Ammonia-Nitrogen	<	10,000 mg/l	2
	COD	<	30,000 mg/l	3 (II)
	Cyanide	<	32.5 mg/l	3
	Fluoride	<	10,000 mg/l	2
	Oil and Grease	<	10,000 mg/l	2
	Total Petroleum Hydrocarbons	<	10,000 mg/l	2
	Chloride	<	10,000 mg/l	2
	TOX	< or =	1,000 mg/l	6 (III)
	Nitrate	<	10,000 mg/l	2
	Nitrite	<	10,000 mg/l	2
	Sulfate	<	10,000 mg/l	2
	pH	<	3.3<pH<12.5	1
TOTAL ANALYSIS	MISCELLANEOUS			
	Total Solids (Lower Limit)	> or =	20.00%	Regulation
	Total Dissolved Solids		No Limit	7
	Total Volatile Solids		No Limit	7
	Free Liquids		No Free Liquids	Regulation
	PCBs (VII)	<	50 mg/kg (RCRA LIMIT)	1
	Oil and Grease	< or =	10,000 mg/kg	6 (IV)
	Total Petroleum Hydrocarbons	< or =	10,000 mg/kg	6 (IV)
	Total Phenols	< or =	10,000 mg/kg	6 (IV)
	BTEX			
	Benzene	< or =	7.50 mg/kg	4 (V)
	Toluene	< or =	10,000 mg/kg	6 (IV)
	Ethyl Benzene	< or =	10,000 mg/kg	6 (IV)
	Xylene	< or =	10,000 mg/kg	6 (IV)
	OTHER			
ASTM WATER LEACHING PROCEDURE MISCELLANEOUS	Total Solids / BOD-5	<	No Limit / 15,000 mg/l	7 / 3 (II)
	Volatile and Semivolatile Organics (vi)	<	15,000 mg/l	2 (I)
	Acids and Bases (vi)	<	10,000 mg/l	2 (I)
	Strong Oxidizers (vi)	<	10,000 mg/l	2 (I)
	Metals, Salts, Nutrients	<	10,000 mg/l	2 (I)
	Products and Various Substances (vi)	<	10,000 mg/l	2 (I)

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN
(PPC PLAN)

ATTACHMENT #6

POST STORM WATER INSPECTION FORM

IESI PA BETHLEHEM LANDFILL CORPORATION
NORTHAMPTON COUNTY, PENNSYLVANIA

BETHLEHEM LANDFILL
POST RAIN EVENT INSPECTION

DATE: _____ Estimated Rainfall: _____

INSPECTOR: _____

ROAD MAINTENANCE

ROAD	MAINTENANCE NEEDED			REPAIRS NEEDED
	WATERED	SWEPT	WASHED	
Loop @ scale area				
Paved Entrance				
Haul road to notch				
Applebutter Road				
Perimeter Berm				

LEACHATE SEEPS	PRESENT		SEEP DESCRIPTION SCHEDULE FOR REPAIRS
	YES	NO	
1. West slope			
2. South Slope			
3. North Slope			

NOTES: ANY LEACHATE SEEP FLOWING OFF THE LANDFILL MUST BE CORRECTED IMMEDIATELY.

EROSION Slopes/Benches	EROSION		TRASH EXPOSED		DISCHARGE ISSUES	DESCRIPTION SCHEDULED REPAIRS
	YES	NO	YES	NO		
1. North Slope- By Shop						
2. North Slope - Cell 4F						
3. South Slope - East of Flare						
4. South Slope- West of Flare						
5. West Slope						
6						
7						
8						

BASINS, PIPES & CHANNELS	EROSION		Accumulated Sediment		DISCHARGE ISSUES	DESCRIPTION SCHEDULED REPAIRS
	YES	NO	YES	NO		
Basin 1						
Basin 2						
Basin 3						
Basin 4						
Basin 6						