



APR - 1 2022

Inspection ID
3340690 & 3340235
Field Code NA

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL

Site I.D. 255983 Telephone # 610-317-3200
 Site Name Bethlehem Landfill Company Operator Name Bethlehem Landfill Company
 Address 2335 Applebutter Road Address 2335 Applebutter Road
Bethlehem, PA 18015 Bethlehem, PA 18015
 Municipality Lower Saucon Township County Northampton
 Responsible Official Astor Lawson Title District Manager
 Person Interviewed Phillip Garcia, Cody White Title Operations Supervisor, Env Compliance Manager
 Inspector Mathew Vipond Title Environmental Trainee
 eFACTS ID # PF 268729 SF 266826

Comment: Additional eFACTS: 3334998, 3340232
 Inspection Date: 03/22/22 & 3/31/22 Type: RTNC Results: OUTNO Resolved: / /
 Permit Expiration Date: 4 / 17 / 2023 Days/Week Operated: 6 Max. Daily Volume: 1800

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				REVISION	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
GENERAL PROVISIONS							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required insurance in effect (expiration date <u>08/01/2022</u>)	<input type="checkbox"/>	271.371	1
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operation in accordance with approved plans and permit.	<input type="checkbox"/>	273.201(c)(2)	2
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation within permit boundaries (vertical and horizontal).	<input type="checkbox"/>	273.201(c)(2)	3
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disposal Timing and sequence as per Section 273.112(1).	<input type="checkbox"/>	273.201(c)(2)	4
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No unapproved wastes or liquids.	<input type="checkbox"/>	273.201(d)-(m)	5
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Isolation distances are adhered to.	<input type="checkbox"/>	273.202(a)	6
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facilities certification requirements followed.	<input type="checkbox"/>	273.203(a), (b)	7
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written Department approval of new construction prior to waste disposal.	<input type="checkbox"/>	273.203(c)	8
DAILY OPERATIONS							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper signs posted.	<input type="checkbox"/>	273.211(a)	9
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site perimeter clearly marked and grid coordinate system in use.	<input type="checkbox"/>	273.311(b)-(d)	10
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper barriers installed around site and access controlled when attendant not present.	<input type="checkbox"/>	273.212(a)-(i)	11
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access roads maintained and negotiable by collection vehicles.	<input type="checkbox"/>	273.213(a)-(l)	12
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved means of measuring and inspected waste utilized.	<input checked="" type="checkbox"/>	273.214(a), (b)	13
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate equipment on-site and stand-by equipment available.	<input type="checkbox"/>	273.215(a), (b)	14
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vehicles directed promptly to unloading area and promptly unloaded.	<input type="checkbox"/>	273.216(a), (b)	15
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Solid waste spread and compacted as approved by Department as part of permit.	<input type="checkbox"/>	273.216(c)	16
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator implements fugitive air contaminant control/measures and prevents and controls air pollution including no exceeding of ambient air quality standards, no open burning, and minimizing generation of fugitive dust emissions from facility.	<input checked="" type="checkbox"/>	273.217(a)	17
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator complies with Air Quality Plan approval and Air quality Operating Permit.	<input type="checkbox"/>	273.217(b)	18

Manager
 Asst. Mgr.
 Zoning
 Finance
 Police
 P. Works
 P/C
 P & R
 EAC
 Engineer
 Solicitor
 Planner
 Landfill
 EMC
 Other
 INSIDE

Site Name Bethlehem Landfill Company
 ID Number 100020
 Date 3/22/22 & 3/31/22

INSPECTION REPORT – MUNICIPAL WASTE LANDFILL (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
				DAILY OPERATIONS (Cont'd)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not cause or allow attraction, harborage, or breeding of vector.	<input type="checkbox"/>	273.218(a)	19
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator implements nuisance minimization and control plan.	<input checked="" type="checkbox"/>	273.218(b)(1)	20
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator performs regular, frequent, and comprehensive site inspections to reduce potential for offsite odors.	<input type="checkbox"/>	273.218(b)(2)	21
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator promptly addresses and correct problems and deficiencies discovered during inspections.	<input checked="" type="checkbox"/>	273.218(b)(3)	22
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator implements nuisance minimization and control plan to minimize and control other conditions harmful to the environment or public health, or which create safety hazards, odors, dirt, noise, unsightliness and other public nuisances.	<input checked="" type="checkbox"/>	273.218(c)	23
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not receive solid waste at a landfill in excess of the maximum or average daily volume approved in the permit.	<input checked="" type="checkbox"/>	273.221(a)	24
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements radiation protection action plan.	<input checked="" type="checkbox"/>	273.223(a)	25
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator monitors incoming waste in accordance with Department's guidance or in a manner at least as protective of the environment, facility staff and public health and safety.	<input checked="" type="checkbox"/>	273.223(b)	26
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Radiation detector elements shall be as close as practical to wasteload and in appropriate geometry to monitor the waste.	<input checked="" type="checkbox"/>	273.223(c)	27
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator has portable radiation monitors capable of determining the dose rate and presence of contamination of a vehicle that has caused an alarm. Upon exceedance of alarm level, a radiological survey of the vehicle is performed.	<input checked="" type="checkbox"/>	273.223(d)	28
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator notifies Department immediately and isolates vehicle when radiation dose rates are exceeded.	<input checked="" type="checkbox"/>	273.223(e)	29
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Monitoring equipment is calibrated at frequency specified by manufacturer, but not less than once a year.	<input checked="" type="checkbox"/>	273.223(f)	30
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If radioactive material is detected, vehicle containing material shall not leave facility without written Department approval and an authorized federal Department of Transportation exemption form.	<input checked="" type="checkbox"/>	273.223(g)	31
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uniform cover of the approved daily cover material is placed on exposed solid waste at the end of each working day or at the end of every 24 hours, whichever interval is less.	<input type="checkbox"/>	273.232(a)	32
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If intermediate cover requires revegetation, it is established within 30 days.	<input type="checkbox"/>	273.233(e)	33
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Slopes constructed during daily landfilling and intermediate cover activities may not exceed 50 percent.	<input type="checkbox"/>	273.233(f)	34
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator does not cause or allow waste pollution within or outside the site from operation of the facility.	<input type="checkbox"/>	273.241(a)-(c)	35
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator has restored or replaced adversely affected water supply with an alternative source of like quantity and quality.	<input type="checkbox"/>	273.245(a)	36
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Temporary water supply is provided within 48 hours.	<input type="checkbox"/>	273.245(b)	37
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Permanent water supply is provided within 90 days.	<input type="checkbox"/>	273.245(c)	38
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No waste 15 feet of inside top of the lined perimeter berm.	<input type="checkbox"/>	273.252(e)	39

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				DAILY OPERATIONS (Continued)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lined perimeter berm 4 ft. high constructed and maintained along edge of the lined disposal area.	<input type="checkbox"/>	273.252(f)	40
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Edge of liner clearly marked.	<input type="checkbox"/>	273.252(g)	41
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Alternate leachate recirculation method may be used if approved if one of the liner systems is a composite liner.	<input type="checkbox"/>	273.274(b)	42
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Underground pipes used to transport leachate to leachate storage impoundments or tanks equipped with secondary containment or comply with 245.445.	<input type="checkbox"/>	273.275(g)	43
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator isolates coal seams, coal outcrops and coal refuse from waste deposits to prevent combustion of waste and damage to liner.	<input type="checkbox"/>	273.291(a)	44
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mine openings within site sealed as approved by Department.	<input type="checkbox"/>	273.291(b)	45
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator implements plan for controlling potential damage from subsidence submitted and approved under 273.120.	<input type="checkbox"/>	273.291(c)	46
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Landfill designed, constructed, maintained and operated to prevent and minimize potential for fire, explosion, or release of solid waste constituents into air, water, or soil of the Commonwealth.	<input type="checkbox"/>	273.301	47
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency equipment including portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment available. For fire equipment requiring water, facility has a water supply of or adequate quantity and pressure to supply the equipment.	<input type="checkbox"/>	273.302(a)	48
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency equipment tested and maintained.	<input type="checkbox"/>	273.302(c)	49
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate space maintained to allow unobstructed movement of emergency personnel and equipment.	<input type="checkbox"/>	273.302(d)	50
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Litter controlled/collected and barriers/fences in place.	<input type="checkbox"/>	273.220(a)-(c)	51
				COVER/SLOPES/REVEGETATION			
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Daily/intermediate cover meets performance and design requirements.	<input checked="" type="checkbox"/>	273.232(b), 273.233(b), (c)	52
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minimum 5-day supply of daily and intermediate cover maintained on-site.	<input type="checkbox"/>	273.232(c) & 273.233(d)	53
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Intermediate cover applied within time limits.	<input type="checkbox"/>	273.233(a)	54
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Intermediate slopes do not exceed 50%.	<input type="checkbox"/>	273.232(d)	55
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cap placed over entire surface of final lift meets performance standards.	<input type="checkbox"/>	273.234(a)(1)	56
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Final cover meets performance and design requirements; applied within time limits.	<input checked="" type="checkbox"/>	273.234(b)-(e)	57
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final slopes stable and erosion controlled.	<input type="checkbox"/>	273.234(f)	58
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Final slopes graded 3-15% or terraced to 33% as approved.	<input type="checkbox"/>	273.234(g)	59
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minimum revegetation and successful revegetation requirements adhered to.	<input type="checkbox"/>	273.235(a)-(e) & 273.236(a), (b)	60
				WATER QUALITY PROTECTION			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Surface and groundwater treatment facilities properly operated and maintained.	<input type="checkbox"/>	273.241(b)	61
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Surface water percolation minimized/prevented.	<input checked="" type="checkbox"/>	273.242(b)(1) & 273.234(e)(4)	62

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1	2	3	4				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Soil erosion and sedimentation controls designed and implemented as per approved plans; gullies over nine inches repaired.	<input type="checkbox"/>	273.242(a)-(c)	63
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sedimentation ponds and discharge structures designed, constructed, operated, and maintained in accordance with Chapters 273, 102, and 105.	<input type="checkbox"/>	273.243(a)-(g) & 273.244	64
				LINER SYSTEM			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Liner system designed, constructed, operated, and maintained when required.	<input type="checkbox"/>	273.251(a), (b)	65
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Edge of liner requirements adhered to (i.e., no waste within 25 feet if adjacent liner, 4 feet high lined berm, to prevent lateral escape of leachate, adequate spacing on inside of berm to collect stormwater and sediment).	<input type="checkbox"/>	273.252(d)	66
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate detection zone monitored weekly.	<input type="checkbox"/>	273.255(c)	67
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover protects primary liner and leachate collection system and allows free flow of leachate into the collection system.	<input type="checkbox"/>	273.257(a)	68
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective cover meets minimum requirements and at least 18 inches thick.	<input type="checkbox"/>	273.257(b)	69
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collection system within protective cover meets minimum requirements.	<input type="checkbox"/>	273.258(a), (b)	70
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.	<input type="checkbox"/>	273.259(a)-(d)	71
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8 feet of select waste placed over protective cover.	<input type="checkbox"/>	273.260	73
				LEACHATE TREATMENT			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collected and handled through Department approved method(s).	<input type="checkbox"/>	273.272(a)-(c)	74
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate transportation requirements adhered to.	<input type="checkbox"/>	273.273(a)-(c)	75
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cessation of site operation if alternate leachate handling not available.	<input type="checkbox"/>	273.273(d)	76
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate treatment system permitted and fully operational at least 3 years before closure.	<input type="checkbox"/>	273.273(e)	77
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate recirculation in accordance with regulations.	<input type="checkbox"/>	273.274(1)-(4)	78
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallons, whichever is greater.	<input type="checkbox"/>	273.275(a)-(f)	79
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Leachate flow rate measured daily; analyzed quarterly.	<input checked="" type="checkbox"/>	273.276(a)-(b)	80
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Department notified when remedial action(s) required.	<input type="checkbox"/>	273.277(1)-(4)	81
				WATER QUALITY MONITORING			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved monitoring system installed and maintained.	<input type="checkbox"/>	273.281(a), (b) & 273.283	82
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quarterly and annual monitoring requirements adhered to and results submitted Department within time constraints.	<input type="checkbox"/>	273.284 & 273.285	83
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Groundwater assessment plan submitted and implement as required.	<input type="checkbox"/>	273.286(a)-(g)	84
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Groundwater abatement plan submitted and implemented as required.	<input type="checkbox"/>	273.287(a)-(f)	85
				RECORDKEEPING AND REPORTING			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operational records maintained, available and submitted as required.	<input type="checkbox"/>	273.288 & 273.311-273.313	86
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily Operational Records kept in accordance with regulations for the life of the facility bond or longer if necessary.	<input type="checkbox"/>	273.311(d)	87

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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator submits quarterly operation report.	<input checked="" type="checkbox"/>	273.312	88
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator submits annual operation report with fee.	<input type="checkbox"/>	273.313	89
				MINERALS AND GAS	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Gas venting and monitoring in accordance with approved plans.	<input type="checkbox"/>	273.292(a)-(d)	90
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Combustible gas levels not exceeded.	<input type="checkbox"/>	273.292(e)	91
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forced gas venting if required.	<input type="checkbox"/>	273.292(f)	92
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Gas recovery conducted as per approved plan and §273.293, including annual analysis.	<input type="checkbox"/>	273.293(a), (b)	93
				EMERGENCY PROCEDURES			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Contingency plan implemented if there is an emergency.	<input type="checkbox"/>	273.303(a)-(c)	94
				RECYCLING			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator shall salvage and recycle waste in accord with recycling plan. (273.196)	<input type="checkbox"/>	273.331(a)	95
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Salvaging and recycling controlled by operator and prevents interference within operations and prevents health hazardous nuisance.	<input type="checkbox"/>	273.331(b)	96
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Salvaged materials stored in an approved area or transported offsite.	<input type="checkbox"/>	273.331(c)	97
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drop off center established for at least three recyclables.	<input type="checkbox"/>	273.332(a)	98
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drop off center properly located, contains bins or containers, open at least 8 hours per week and 4 hours during evenings or weekends.	<input type="checkbox"/>	273.332(b), (c)	99
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Approved public notice of availability of drop off center availability is provided.	<input checked="" type="checkbox"/>	273.332(d)	100
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	On or before January 15 each year, operator informs municipality in writing of weight and type of materials recycled previous year.	<input type="checkbox"/>	273.332(e)	101
				SPECIAL HANDLING AND RESIDUAL WASTES			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special handling and residual wastes disposed with prior Department approval, and in accordance with permit and Chapter 273.	<input type="checkbox"/>	273.501	102
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Infectious waste disposal restrictions adhered to.	<input type="checkbox"/>	273.511(a)-(d)	103
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chemotherapeutic waste disposal restrictions adhered to.	<input type="checkbox"/>	273.512	104
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sewage sludge co-disposal and monofill requirements followed.	<input type="checkbox"/>	273.513	105
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sewage sludge sampling requirements adhered to and sludge meets standards for control of pathogens, vectors, and odors.	<input type="checkbox"/>	273.513(c)	106
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disposal of municipal waste incineration ash in landfill or landfill cell that meets Chapter 273 requirements.	<input type="checkbox"/>	273.514(a)	107
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ash residue disposal in dedicated landfill or landfill cell unless co-disposal in accordance with Chapter 273 (including leachability treatment).	<input type="checkbox"/>	273.514(b)	108
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ash residue covered immediately or as approved by the Department.	<input type="checkbox"/>	273.514(c)	109

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1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
BONDING AND INSURANCE							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bond filed with Department.		271.312	110
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bond maintained in an amount and with guarantees as required. Bond amount \$ _____ Phased deposit due date. ____ / ____ / ____		271.333(b)	111
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proof of a commercial policy of liability insurances submitted to the Department as specified by 271.374. Policy # <u>HDOG72482547</u> Insurer (company name) <u>ACE American Insurance Company</u> Expiration Date: <u>8/1/2022</u>		271.374	112
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
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INSPECTION REPORT COMMENTS

Date of Inspection 03/22/2022 Identification Number 100020

Company/Facility/Site Name Bethlehem Landfill Company

Comments:

The PA Department of Environmental Protection ("Department") conducted a routine complete inspection on March 22, 2022 at Bethlehem Landfill Company ("BLC"). Representing the Department from the Solid Waste Program was Mathew Vipond ("this inspector"). Phillip Garcia and Cody White provided the site tour and met with this inspector at the conclusion of the inspection. Weather was sunny, 46°, winds northwest at 10-15 MPH, 36% humidity.

The following department personnel have entered the landfill since the February 17, 2022 inspection: Matt Glogowski (02/22/2022); Chris Madden (03/01/2022).

3/22/2022 SITE TOUR:

Prior to entering the landfill, this inspector conducted an odor patrol in the areas surrounding the landfill. A slight, intermittent garbage odor was detected approximately 1000 feet east of the landfill entrance, adjacent to the unloading of solid waste. No other offsite odor was detected.

No excessive dust or mud was observed on Applebutter Road near the entrance to the facility.

All signage was clearly posted at the entrance.

This inspector entered the landfill at 0932 hours.

Trucks were observed queuing at the truck wash for cleaning. One truck was bypassing the wash. The wheels on this truck were free of mud and debris.

All roads were drivable and properly graded. The water truck had recently sprayed the road to the upper deck and no dust from vehicles was occurring.

BLC is continuing to operate the working face at SE2-AB Phase I at the eastern end of the landfill, on the upper deck. Heavy equipment operations were pushing waste downhill onto the slope for disposal. Two compactors and one dozer were grading waste inside the active fill area. Multiple litter fences were staged on the upper deck to trap windblown litter. Due to high winds some litter was pushing past the fencing downslope. Mr. Garcia contacted his picking crew to immediately come out and clean this area. BLC's perimeter line misters were not in operation, due to winter weather. BLC is using a tarp for daily cover.

Some downslope rutting of biosolids intermediate cover material on north slope was observed. Discussed observation with Mr. Garcia who stated that dozer tracking for mixing of cover material had created the ruts which would be corrected. BLC is reminded honor the requirements of §273.242(b)(1) by applying cover soil uniformly to maximize stormwater runoff and minimize surface water percolation into the solid waste.

Some intermediate cover on east/northeast slopes showed daylighting of waste and windblown plastic litter. BLC is reminded to honor the requirements of §273.233(1) and ensure that waste is properly covered to prevent vectors, odors, blowing litter and other nuisances.

On the south side of the landfill, grading and foundation work is still being implemented by third-party contractor for the future LFG/energy plant.

Sedimentation pond #4 was observed and is partially cleaned out. Operator has contracted with third-party consultant to begin work in the spring. (NOTE: At the subsequent routine-partial inspection conducted on 3/31/2022, work had begun on the cleanout and regrading of the pond).

BLC's flare was in operation, with a temperature of 1651°F and a flow rate of 3129 cfm.

The scalehouse was calibrated on January 11, 2022.

3/31/22 SITE TOUR:

On 3/31/22, in response to an odor complaint, this inspector conducted an odor patrol adjacent to the landfill. Slight intermittent and moderate persistent odors of mulch were detected throughout Steel City. This inspector met with Operations Supervisor, Phillip Garcia, to discuss findings. Mr. Garcia stated that no fertilizer or sludge had been accepted by the landfill in the recent past. Mr. Garcia escorted this inspector on a driveraround tour of the landfill. No odors consistent with the mulch odors in Steel City were detected.

ODOR COMPLAINT INVESTIGATIONS:

The department received two odor complaints since the last inspection on February 17, 2022. Complaints were followed up with odor patrols conducted by the Department on 2/28/22, 3/7/22, 3/16/22, 3/22/22 and 3/31/22 as well as a routine partial inspection conducted on 3/31/22 as a follow-up to the odor complaint received the same day.

Line item #13: Overweight truck logs revealed the following number of overweight trucks:
February: 35

Line item #17: BLC's odor patrol logs, gas data and site inspection logs were reviewed. Since the last inspection, BLC conducted 16 odor patrols. BLC's odor patrols and odor patrol measures appear to be following their Nuisance Minimization and Control Plan.

Line item #24: Daily tonnages were reviewed from February 17 through March 21. There did not appear to be any exceedances of the 1800-ton daily limit. The greatest one-day tonnages were:
February 21: 1792 tons
March 8: 1792 tons

Line item #25-31: Daily radiation monitor checks were reviewed since the last inspection. Records appeared complete. BLC has had the following radiation hits since the February 17 inspection:
3/22/22: I-131, disposed on site.

Line item 52: BLC is reminded to maintain intermediate cover in accordance with the performance standards in 25 Pa. Code § 273.233(a)(1)(5). "Uniform and compacted intermediate cover shall... prevent vectors, odors, blowing litter and other nuisances; control infiltration of precipitation and erosion and sedimentation."

Line item #57: A Notice of Violation was issued to BLC on 4/29/20 for a violation of 25 Pa. Code § 273.234(b). BLC has responded to the Notice of Violation, however the violation remains outstanding.

Line item #80: Leachate flow rates:
February: 746,009 gallons

Line item #88: The quarterly operation report was submitted on 1/27/22.

Line item #100: Public notice of recycling was published in the Morning Call on Friday, March 25, Saturday, March 26 and Sunday, March 27.

This concludes this inspection report.

Person Interviewed Sent to Facility via Email Date 04-01-2022
(Signature)

Inspector Mathew Vipond Date 04-01-2022
(Signature)

Investigator: M. V. POND Date: 3/22/22
 Weather Conditions: 46° F, WIND 15 MPH, 36% RH, SUNNY

CASE: BLC

ODOR PATROL SURVEY

SURVEY LOCATION	TIME	ODOR		DESCRIPTION	COMMENTS & OBSERVATIONS
		INTENSITY S = Strong M = Moderate SL = Slight N = None	DURATION P = Persistent I = Intermittent N = None		
Riverside Dr.	9:00	N	N		
Saucer Ave.	9:01	N	N		
Plants Ave.	9:03	N	N		
Snyder Ave.	9:03	N	N		
Hobbes Ave.	9:04	N	N		
Salmon Ave.	9:05	N	N		
Lywood Ave.	9:06	N	N		
Riverside Dr.	9:07	N	N		
Relington Pl.	9:12	N	N		
Lower Saucer Ave.	9:17	N	N		
Applebutter Rd.	9:21	SL	I	G	SEE OFF ENTRANCE
Applebutter Rd.	9:21	N	N		
Shanty Hill Rd.	9:24	N	N		
Applebutter Rd.	9:25	N	N		

eFacts #: 3334998

Investigator: H. V. POJUD Date: 3/31/22 CASE: BLC Account
 Weather Conditions: 52° 2-3004 winds S/SW 12-14PH, 8-27-11 ODOR PATROL SURVEY

SURVEY LOCATION	TIME	ODOR INTENSITY		ODOR DURATION		ODOR DESCRIPTION EG = Rotten Egg LFG = Landfill Gas G = Garbage S = Sewage D = Dredge O = Other (describe)	COMMENTS & OBSERVATIONS
		S = Strong M = Moderate SL = Slight N = None	P = Persistent I = Intermittent N = None				
Riverside Dr.	10:49	N	N				
Sycamore Ave.	10:50	N	N				
Roberts Ave.	10:53	N	N				
Missall Ave.	10:54	SL	I		O		(sanitary, neutral)
Jefferson Ave	10:56	N	N				
Adams Ave.	10:58	N	N				
Western Ave.	10:59	SL	I		O		(fertilizer, neutral)
Walthams Ave.	11:02	N	N				
Salsbach Ave.	11:12	N	N				
Adams Ave.	11:13	N	N				
Riverside Dr.	11:14	N	P		O		(animal manure, urine)
Pedington Rd.	11:20	N	N				
Lower Sycamore Ave	11:23	N	N				
Applebutter Rd.	11:24	N	N				

Bethlehem Landfill ODOR COMPLAINT LOG (2335 Applebutter Rd, Bethlehem, PA 18015)

Date	Time	Address	Distance from Landfill (miles)	Skies	Weather Data (Allentown (KABE))			Residence / Drive-by	Description / Notes	Gas Management Data			Date of Initial Response		Addressed In Insp Report Dated
					Temperature	Wind (out of)				Flare (scfm)	BRG (scfm)	Total (scfm)	Response	Addressed	
01/07/22	8:38	Johnson Ave., Steel City	0.980	Mostly Cloudy	26.0	W @ 6mph	Residence	Landfill odor on their property to the point where it's nauseating to be outside today.	2959	0	2959	1/10/2022	1/5/2022		
01/13/22	8:30	Jefferson Ave, Steel City	0.939	Cloudy	27.0	ENE @ 3mph	Residence	Landfill odor on their property to the point where it's nauseating to be outside today.	3048	0	3048	1/18/2022	1/5/2022		
01/27/22	5:33	Riverside Drive, Bethlehem	1.270	Fair	7.0	Calm	Residence	I've smelled leachate coming from the landfill. It's putrid.	2916	0	2916	1/31/2022	2/17/2022		
02/13/22	21:20	Saucon Ave, Steel City	0.883	Fair	23.0	N @ 12mph	Residence	Odor complaints-light methane gas odor coming from Bethlehem Landfill	3025	0	3025	2/14/2022	2/17/2022		
03/05/22	23:44	Saucon Ave, Steel City	0.883	Fair	37.0	E @ 3 mph	Residence	Landfill gas odor, very strong as always				3/7/2022	3/22/2022		
03/31/22	9:33	Johnson Ave., Steel City	0.980	Cloudy	46.0	ENE @ 6mph	Residence	Manure type odor on property that is coming from the Bethlehem Landfill. Odor present at time of call.				3/31/2022	3/22/2022		

Faulch, Amy

From: Cody White <Cody.White@WasteConnections.com>
Sent: Tuesday, March 22, 2022 2:05 PM
To: Vipond, Mathew
Subject: [External] FW: Feb 17 to March 21

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

Matt,

I believe this is the last piece of the puzzle for your inspection. If you need anything else just let me know.

Cheers,

Cody White
Environmental Compliance Manager
Bethlehem Landfill – Eastern Region
Office: 610.317.3200 ext. 108
Work Cell: 610.390.5536
Email: cody.white@wasteconnections.com



From: Dee Raisner <dee.raisner@wasteconnections.com>
Sent: Tuesday, March 22, 2022 12:33 PM
To: Cody White <Cody.White@WasteConnections.com>
Subject: Feb 17 to March 21

17-Feb	1,662.78	1-Mar	1,677.07
18-Feb	1,111.82	2-Mar	1,627.32
19-Feb	596.32	3-Mar	1,461.74
21-Feb	1,792.32	4-Mar	1,771.60
22-Feb	1,713.82	5-Mar	930.67
23-Feb	1,779.27	7-Mar	1,697.46
24-Feb	1,610.46	8-Mar	1,791.60
25-Feb	927.32	9-Mar	1,712.54
26-Feb	602.17	10-Mar	1,530.45
28-Feb	1,777.15	11-Mar	1,633.56
		12-Mar	488.86
		14-Mar	1,499.19
		15-Mar	1,672.37
		16-Mar	1,776.39
		17-Mar	1,651.47
		18-Mar	1,726.53
		19-Mar	814.47

21-Mar 1,760.36



Dee Raisner
Bethlehem Landfill Company
Phone: 484-241-4544

dee.raisner@wasteconnections.com



Office: 610-317-3200
Office Fax: 484-626-0600

2335 Applebutter Road
Bethlehem, PA 18015
www.bethlehemlandfill.com

File Distribution:

PA DEP NERO WM File-thru M. Vipond
Facility-sent via Email PDF
Lower Saucon Township- sent via Email PDF
R. Bellas/D. Ritter (email PDF)
A. Faulch (email PDF)
AQ: C. Madden/M. Bardzilouskas (e-mail PDF)
M. Glogowski (e-mail PDF)
R. Malizia (email PDF)

Lower Saucon Township: Leslie Huhn
manager@lowsaucontownship.org