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February 25, 2022

PA DEP
Roger Bellas –Program Manager
Waste Management Program
2 Public Square
Wilkes-Barre, PA 18701-1915

RE: Bethlehem Landfill Company (BLC)
Second Environmental Assessment Review
Municipal Waste Major Permit Modification
Application—Northern Realignment
Application# 100020-A203 APS# 1033510,
AUTH ID# 1345418
Response to February 8, 2022 Letter
Our file: b/1162.4/Northern Realignment/RL02082022

Dear Roger:

In response to your Second Environmental Assessment Review letter dated February 8, 2022 to our client, Bethlehem Landfill Company, we offer the following responses in **bold** for ease of reading.

Deficiencies

Form D Section N Benefits and Harms:

1. The footnotes on the last page of the Nuisance Minimization and Control Plan (NMCP) still refer to the facility as “IESI” and should be changed to “Bethlehem Landfill Company.”

The footnotes on the last page of the NMCP have been updated to Bethlehem Landfill Company (BLC). See Attachment A- Revised NMCP.

2. Due to an uptick in recent odor complaints, correspondence received by DEP from Lower Saucon Township regarding concerns about odors, observations during DEP inspections conducted since the Department’s first EA letter was sent on September 24, 2021, recent landfill gas surface emission monitoring results, and BLC’s failure to complete geosynthetic capping projects in a timely manner DEP believes BLC should

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implement additional mitigation measures to prevent off site odors. Specifically BLC should propose a plan for enhanced surface monitoring to be conducted in areas of intermediate cover and re-evaluate the current final and temporary capping schedules as proposed.

Attached is an updated proposed capping schedule- Attachment B. The +/- 6.3 acres of capping on the North slope that had been planned for the fall of 2021, is scheduled for this spring as soon as weather conditions allow. The 2022 capping projects (+/- 7.7 acres of final cap and +/- 4.1 acres of temporary cap are scheduled to begin in early summer. As previously relayed to PADEP, trucking and material shortages prevented the North slope capping event from getting completed in 2021. Attached is an Enhanced Odor Mitigation Plan- Attachment C which includes performing monthly surface emissions monitoring (SEM) on uncapped areas at intermediate grade with intermediate cover.

3. DEP requests BLC revise the NMCP to specifically add the language that BLC does not use the tipper during wind events with a sustained rate of 35 mph or more on the NMCP table.

The NMCP has been updated to indicate that the tipper will not be utilized during wind events with a sustained rate of 35 mph or more(see Attachment A).

4. Multiple storms in the recent past have caused sedimentation basin 4 to overflow. Inspections and inquiries by DEP staff have revealed the basins are not cleaned out regularly per the approved Form I Inspection Frequency and Maintenance plan. In addition, BLC committed to completing the clean out of sedimentation basin number 4 in a timely manner in the Fall of 2020. To date, sedimentation basin 4 has yet to be properly cleaned out. BLC should update Form I Table I-2 to include more detailed maintenance, inspection, and recordkeeping procedures. These procedures should comply with 25 Pa. Code § 102.4(b)(5)(x) and the Pennsylvania Stormwater Best Management Practices Manual Chapter 6. BLC should also identify the staff/positions that will ensure the procedures are followed and documented as required.

BLC has contracted out having basin 4 cleaned out. This is scheduled to take place in April/May as conditions allow. The Form I Table I-2 has been updated(See Attachment D) to include a Post Rain Event Inspection Form(See Attachment E). This form needs to be filled out following significant rain events and be reviewed by landfill management to ensure proper function of the erosion and sediment controls on-site.

Form D Section A Geologic

5. DEP would like to note that while BLC's response for DEP's original comment regarding the Form 6 and Form 7 is adequate for purposes of this application; for any future expansion application BLC is required to complete a current Form 6 and Form 7, per the instructions, including all the required information in a more succinct format omitting outdated and irrelevant information.

Understood

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

Very truly yours,

MARTIN AND MARTIN, INCORPORATED



Kevin N. Bodner

cc: David Pannucci, BLC (via email)
Lower Saucon Township (via email)
Northampton County Council (via email)
Lehigh Valley Planning Commission (via email)

Attachment A

Revised Nuisance Minimization and Control Plan (NMCP)

**Bethlehem Landfill Company
Northern Realignment Application
Nuisance Minimization and Control Plan – Summary**

Bethlehem Landfill Company (“BLC”) has submitted an application for the Northern Realignment of the Bethlehem Landfill. Incorporated within that application, BLC has provided numerous measures to minimize and control potential nuisances associated with the operation of a solid waste disposal facility. These measures are contained in various portions of the application and comply with the Department’s municipal waste management regulations, including 25 Pa. Code §273.136. For convenience, the Table below summarizes the monitoring aspects of these measures. For each measure, the Table identifies the principal monitoring program to verify that the measure is implemented, the record keeping system used to document the effectiveness of the measure, and a reference(s) to the application documents where additional detail on the measure is available. This summary may not be exhaustive of all design elements and operational procedures contained within the application that relate to nuisance minimization or control, and this Table is not intended to limit BLC’s ability to utilize other measures if nuisance conditions arise.

Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program ¹	Record Keeping/Reporting ²	Application Document References
Odors ³	Cover (daily, intermediate and final)	Weekly inspection (at least)	Daily operations records	Form 14, Item L-2 (existing); Form 14, Item C (existing); Form 14, Items R, S, T and U (existing); Form F, Item C.7 (existing), DEP4/2017 EAP Comments – 100’x100’ and Odor Neutralizers ⁶ , EOMP ⁹
	Waste Acceptance Plan	Initial approval followed by review of each incoming load	Initial approval and annual confirmation; daily logs for each load; Daily ⁷ , quarterly and annual operations records	Form 14, Attachment 14-3 (approved Form R for site)(existing); Form 14, Items G-2 and H-3 (existing); Form 14, Item C (existing)
	Active Gas Collection and Flare System	Gas Monitoring and Control Plan	Continuous (flare; weather); Daily ⁷ (perimeter checks); Monthly (well field balance); Quarterly (surface monitoring)	Form K, Attachment K-2 (Landfill Gas Monitoring and Control Plan) (existing); Form G(B); Title V (existing); Form 54 (existing), EOMP ⁹
	Final Capping	Established Final Capping Schedule	Annual operations records	Plan Sheets LF-26 to LF-28; Form 14: Items T and U (existing); Form 28, Paragraph 2.1 (existing); IESI Response to DEP 3/27/2002 EAP Comments, Harms – Air Q./Odors/Nuisance (existing)
Odor	Odor Patrol	Daily (operational days)	Daily operations records ⁷	EAP Response
	Leachate Seep Control	Weekly inspection (at least)	Daily operations records ⁷	Form 14, Items R and S (existing)
	Cap/Gas System Removal	Weekly inspection (at least)	Daily operations records ⁷	Form K Narrative Response

Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program ¹	Record Keeping/Reporting ²	Application Document References
Dust ³	Access Roads – Construction	Inspection during and end of construction, then periodic	Certification of Construction	Plan Sheet LF-61 and LF-62; Form 14, Items J, J-1 and J-4 (existing); Form 14, Item L-4 (existing)
	Perimeter Checks	Daily inspection	Daily operations records ⁷	Title V (existing)
	Access Roads – Maintenance (sweeper vehicle/water truck)	Daily inspection	Continuous (weather); Daily operations records ⁷	Form 14, Item D-4 (existing); Form 14, Item L-4 (existing); Form G(A); Form 54 (existing)
	Dust Monitors (if needed)	Periodic inspection	Daily operations records	Form 14, Item L-4 (existing); Form G(A)
	Vegetate disturbed areas	Daily inspection	Daily operations records	Form H (existing); Form 14, Item L-4 (existing)
	Waste Acceptance Plan	Initial approval followed by review of each incoming load	Initial approval and annual confirmation; daily logs for each load; Daily, quarterly and annual operations records	Form 14, Attachment 14-3 (approved Form R for site)(existing); Form 14, Items G-2 and H-3 (existing); Form 14, Item C (existing)
	No Open Burning	Daily inspection	Daily operations records ⁷	Form 14, Items L-2 and Item O (existing)
Mud ³	Access Roads – Construction	Inspection during and end of construction, then periodic	Certification of Construction	Plan Sheet LF-61 and LF-62; Form 14, Items J, J-1 and J-4 (existing); Form 14, Item L-4 (existing)
	Access Roads – Maintenance (sweeper vehicle/water truck)	Daily inspection	Daily operations records ⁷	Form 14, Item D-4 (existing); Form 14, Item L-4 (existing); Form G(A)
Vectors ³	Cover (daily, intermediate and final)	Weekly inspection (at least)	Daily operations records	Form 14, Item L-2 (existing); Form 14, Item C (existing); Form 14, Items R, S, T and U (existing); Form F, Item C.7
	Licensed Extermination Services	Inspections by Landfill Manager and observations by landfill personnel	Daily operations records	Form 14, Item L-1 (existing)
Litter ³	Tarps and covers on vehicles	Inspection of each incoming load and random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan ⁴) (existing)
	Working Face Management – small size and water spray	Inspection during waste disposal	Continuous (weather); Daily operations records ⁷	Form 14, Item M and Item P-4 (existing); Form 54 (existing)

Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program ¹	Record Keeping/Reporting ²	Application Document References
	Waste Trailer Tipper ⁸	Inspection during waste disposal	Daily operations records	Form 14 – Waste Trailer Tipper 2/18/14 (existing)
	Prompt placement of daily cover	Weekly inspection (at least)	Daily operations records	Form 14, Item L-2 (existing); Form 14, Items C and M/ Form 14, Item R (existing); Form F, Item C.7
	Litter fencing	Daily inspection	Daily operations records ⁷	Form 14, Item M (existing)
	Litter patrol	Weekly inspection, and as needed	Daily operations records ⁷	Form 14, Item M (existing)
Noise ³	Equipment fitted with proper mufflers	Daily observation	Daily operations records ⁷	Form 14, Item L-3 (existing)
	Onsite speed limit at 10 m.p.h.	Daily observation	Daily operations records ⁷	Form 14, Item L-3 (existing)
	Backup Motion Sensor system	Daily observation	Daily operations records ⁷	IESI Response to DEP 3.27.2002 EAP Comments, Harms – Noise, and Exhibit 17 (existing)
	Hours of Operation	Daily observation	Daily operations records ⁷	Form 14, Item I (existing)
Traffic ^{3,5}	Weight restriction compliance	Weigh each incoming load and random inspections	Scalehouse records and Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan ⁴) (existing)
	Vehicle signage compliance	Inspection of each incoming load and random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan ⁴) (existing)
	Fire extinguisher compliance	Random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan ⁴) (existing)
	Safety equipment compliance	Random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan ⁴) (existing)
	Recordkeeping compliance	Random inspections	Truck Inspection Form	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan ⁴) (existing)
	Route compliance ⁵	Routine observation and monthly landfill advisory committee	Daily operations records	Exhibit 12 to IESI Response to DEP 3/27/2002 EAP Review (Transportation Compliance Plan ⁴) (existing)11/2017
	Traffic flow ⁵	Routine observation	Traffic Impact Study	Form D, Attachment 10, Exhibit 1

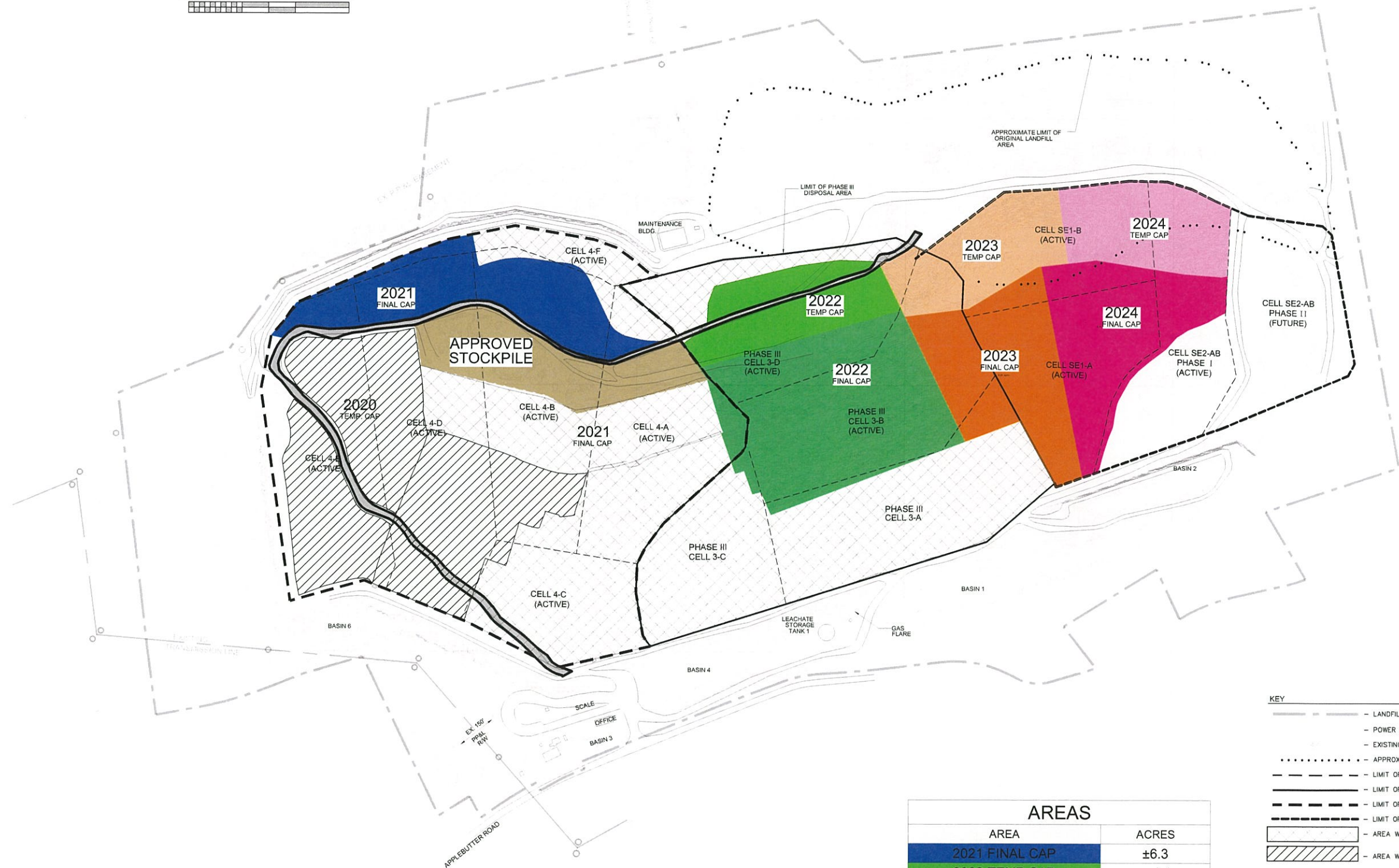
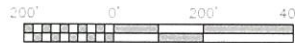
Potential Nuisance	Minimization/Mitigation Measure	Monitoring Program ¹	Record Keeping/Reporting ²	Application Document References
Runoff	Soil Erosion and Sediment Control Plan	Inspections after each rain event, daily and weekly (including landfill benches, pipes and perimeter channels)	Daily operations records ⁷	Form I, Table I-2, Post Rain Event Inspection Form
	Access Roads – Construction	Inspection during and end of construction, then periodic	Certification of Construction	Form I, Section D; Plan Sheet LF-61 and LF-62; Form 14, Item D-7 (existing); Form 14, Items J-1, 3 and 5 (existing); Form 14, Item L-4 (existing)
	Leachate Seep Control	Weekly inspection	Daily operations records	Form 14, items R and S (existing); IESI Response to DEP 3/27/02 EAP Comments, harms – Air Quality/Odors/Nuisance (existing)
Leachate	Liner System	Construction QA/QC and certification	Certification of Construction	Form 24, Attachment 24-2 (QA/AC Plan); Form 14, Items C, C-4 (existing)
	Leachate Management System	Continuous monitor via electronic sensors, and routine observation	Daily operations records	Form 25, Attachment 25-1; Form 14, Items C, C-4 (existing)
	Groundwater Monitoring System	Quarterly and annual sampling	Quarterly and Annual Operation Records	Form 18 (existing); Form 7; Form 14, Item C (existing)
	Groundwater Abatement System	Quarterly and annual sampling	Quarterly and Annual Operation Records	Form 18 (existing); Form 7; Form 14, Item C (existing)

1. – As site conditions warrant, but at least annually, BLC will review the compliance history of the facility (during preparation of the Annual Operations Report) and evaluate whether adjustments to existing operations are required to address nuisance conditions. Pursuant to such review, if an increase in nuisance conditions is identified, BLC will evaluate the occurrence of such conditions to determine whether a correlation exists with any of the meteorological monitoring data collected for the facility, and will incorporate such informations into an appropriate response.
2. – The Landfill Manager encourages all Landfill personnel to report any safety hazards, public nuisances, or anything that may pose a threat to public health or the environment. The Landfill Manager maintains a log of all reports and any complaints from residents and/or the Department relative to nuisances. In addition, relevant construction and operational records note unusual conditions and corrective actions when taken, and these documents are open to regular review by the Department and Township inspectors.
3. – If BLC receives a complaint from a neighboring property owner or from an occupant along the approach routes regarding concerns with odors, dust, mud, vectors, litter, noise or traffic related to Landfill activities, BLC investigates the complaint and reports the findings to the complainant. A record of the complaint and the findings are recorded on the daily operations record.
4. – The Transportation Compliance Plan for the BLC Bethlehem Landfill provides for an annual review of the Plan and an evaluation of whether adjustments to the Plan are needed to minimize and mitigate potential conditions. TCP updated November 2017.
5. – The Transportation Compliance Plan includes trucks hauling cover soil and construction materials.
6. – Odor neutralizers are a water-based product. Therefore, under prolonged temperatures below freezing, the odor neutralizer system will not be operational.
7. – During operational days.
8. – The Tipper shall not be operated during wind events with a sustained rate of 35 mph or more.
9. – Enhanced Odor Monitoring Plan (EOMP)

Attachment B

Updated Proposed Capping Schedule

\\Lfcadd1\dwg\BETHLEHEM\2020\1162_1CAP20-07 R1.dwg, L1, 2/11/2022 8:55:43 AM, MATT-PC



AREAS	
AREA	ACRES
2021 FINAL CAP	±6.3
2022 TEMP CAP	± 4.1
2022 FINAL CAP	± 10.6
2023 TEMP CAP	±4.3
2023 FINAL CAP	±6.3
2024 TEMP CAP	±4.3
2024 FINAL CAP	±6.3
TOTAL	± 42.2

- KEY**
- - - LANDFILL PROPERTY LINE
 - - - POWER LINE R/W
 - - - EXISTING CONTOURS
 - APPROX. LIMIT OF ORIG. LANDFILL AREA
 - - - LIMIT OF PHASE I & II DISPOSAL AREA
 - - - LIMIT OF PHASE III DISPOSAL AREA
 - - - LIMIT OF PHASE IV DISPOSAL AREA
 - - - LIMIT OF SOUTHEASTERN REALIGNMENT DISPOSAL AREA
 - AREA WITH MEMBRANE CAP
 - ▨ AREA WITH TEMPORARY CAP

NOTE:
 TOPOGRAPHIC DATA BY FIRMATEK, LLC
 10010 SAN PEDRO AVE., SUITE 850
 SAN ANTONIO, TX 78216
 (210) 651-4990
 WWW.FIRMATEK.COM

CAPTURE DATE: 3-22-21

DISPOSAL AREA INFORMATION (PHASE III AND EARLIER) TAKEN FROM PHASE III PERMIT DRAWINGS
 BY GANNETT FLEMING DATED NOV. 9, 1993

PROPERTY LINE DATA TAKEN FROM PLAN BY KEYSTONE CONSULTING ENGINEERS, INC. DATED
 3-31-98 & REVISED THRU 12-13-2000.

NO.	REVISION	DATE	SEAL
1	2022 UPDATE	2/2022	

SHEET TITLE: **PROPOSED CAPPING SCHEDULE**

LOWER SAUCON TWP. NORTHAMPTON CO. PENNSYLVANIA

Bethlehem Landfill Company
 WASTE CONNECTIONS, INC.
 PENNSYLVANIA

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

PRJ. NO: 1162.4 DWG. BY: MSH CHK. BY: RMB
 BSN. BY: MSH

CADD FILE: 1162_1CAP20-07 R1.DWG

DATE: MAY 2020

SCALE: 1" = 200'

DRAWING NO. **1**

Attachment C

Enhanced Odor Mitigation Plan

BETHLEHEM LANDFILL

Enhanced Odor Mitigation Plan

Bethlehem Landfill Company (BLC) takes odor control very seriously and has implemented measures to identify the source and address odors before they become a nuisance. BLC conducts both on and off site inspections to monitor for fugitive odors.

BLC understands that fugitive emissions off-site are possible. To minimize this, frequent on-site inspections are conducted daily to investigate possible sources of odor, and implement the mitigation efforts when needed.

BLC personnel patrol the site perimeter and nearby public roads daily to identify errant odors. These odor patrols include Applebutter Road, Riverside Drive and the Steel City Area. These inspections may increase in frequency upon evaluation of patrol results. The site maintains a log of these inspections and notes the location traveled and any observations.

In addition, BLC has implemented an Enhanced Odor Monitoring Program which conducts on site nuisance patrols to find potential odors on site and commences mitigation measures immediately eliminating any potential for off-site complaints.

Should an odor be observed one or more of the following may be implemented:

- Odor neutralizer misters will be turned on.
- Portable misters will be moved to the source of the odor and also placed directly around the working face.
- Daily cover placement is started over the odorous wastes.

Potential odors from landfill gas are primarily controlled through a network of gas extraction wells that are maintained under vacuum. The number of gas wells and collection piping network will continue to expand as the landfill mass increases to ensure proper capture of landfill gas and control potential odors.

For each partial lift that BLC does not intend to place additional waste material for six (6) months, intermediate cover will be installed. Furthermore, as an enhanced monitoring and nuisance management practice, BLC will perform monthly surface emissions monitoring (SEM) of uncapped intermediate (cover) slopes. The monitoring will be performed using the same general procedures currently followed for the quarterly NSPS surface emissions monitoring event, with the exception that the monthly surveys will only be performed in uncapped intermediate grade slope areas. Additionally, monitoring results, survey observations, and any improvement actions taken will be documented on BLC Landfill Enhanced Surface Monitoring Follow-up Forms (attached). These forms will be kept on file at the site for DEP or Township review upon request. The SEM data will be reviewed by BLC as outlined below to identify the presence of potentially odorous emissions not being contained by the intermediate cover.

BETHLEHEM LANDFILL

Enhanced Odor Mitigation Plan

This enhanced monitoring is being implemented as a best management practice associated with nuisance odor control and gas management system operation/performance optimization. Accordingly, BLC will trigger emissions reduction efforts if either the 500 ppm threshold is exceeded or an increasing month to month concentration trend is observed from the color coded isopach/contouring maps, both as detailed below.

SEM procedures and parameters consist of the following:

- Monitoring along a pattern that traverses the area of interest at 30-meter intervals.
- Monitoring will be performed using an organic vapor analyzer, flame ionization detector (FID) or similar portable monitoring device held just above the ground surface (e.g. 2” – 4”).
- The location of each monitored location above the 500 ppm threshold will be marked and location recorded.
- Cover maintenance, adjustments to the vacuum of the adjacent well(s) to increase the gas collection in the vicinity of each threshold reading, or other options as described below shall be made. Each location above the threshold will be re-monitored within 10 calendar days of detecting the >500 ppm action threshold.
- Any location that initially showed a reading above the 500 ppm threshold but has a concentration less than 500 ppm at the 10-day re-monitoring will be checked 1 month from the initial exceedance. If the 1-month re-monitoring shows a concentration less than 500 parts per million above background methane levels, no further monitoring of that location will be performed until the next monitoring period. If the re-monitoring shows a level above the threshold, actions detailed below will be taken.

Monitoring will not be performed when dangerous/unsafe conditions exist. These conditions are typically temporary, and BLC will resume monitoring as soon as practical. BLC personnel will also use their discretion in determining dangerous/unsafe conditions for performing enhanced monitoring on intermediate slopes steeper than 3:1 (H:V). BLC’s determination that an area is dangerous and/or unsafe to monitor will be documented and maintained on-site for Department review upon request.

To review and evaluate the monthly monitoring results, the collected readings, logged with a GPS location stamp, will be uploaded into a site map in AutoCAD® or similar mapping software, and overlain with the existing gas management system (e.g. as-built gas collectors and conveyance piping). Isopach/contouring tools will be used to graphically contour and colorize the map based on SEM concentrations. The range of contour colors representing the surface emission concentrations will be selected within the software as follows:

- 0-100 ppm = Green
- 101-199 ppm = Yellow
- 200-499 ppm = Orange
- 500+ = Red

BETHLEHEM LANDFILL

Enhanced Odor Mitigation Plan

The colors will be used to graphically highlight differences in the SEM concentrations across the uncapped intermediate grade slopes. By colorizing the surface emissions data set, site personnel will be able to more easily identify potential problem areas for assessment. Further, these maps will be created on a monthly basis allowing BLC to complete month to month comparisons for trend identification, as well as determine the effectiveness of the gas management system and any optimization actions taken. The isopach map data will be reviewed in conjunction with the gas management system performance data (e.g. individual gas collector quality and flow parameters) and any odor observations in the corresponding area, and evaluated to assess opportunities for improvement. This process will be completed regardless of the individual concentrations recorded, although an action threshold is established with procedures for follow-up as further outlined below.

BLC will evaluate the month to month data isopach maps to determine if the overall trend in any intermediate grade slope areas exhibits increasing surface emissions. An increasing trend in the area of yellow and/or orange hatch coverage will also result in further investigation and emission reduction action including any or all of the following, as appropriate:

1. Investigate area for signs of surface emissions (cracked cover material, leachate seeps, distressed vegetation, rills, gas migration pathways, etc.);
2. Repair breaks in the intermediate cover, add intermediate cover and re-compact with a roller or plate tamper to seal the surface;
3. Strip vegetation and topsoil and install seep control measures as necessary; and
4. Increase the vacuum to nearby LFG collection devices, install additional LFG collection device(s), or perform other operational or engineering controls based on an analysis of the isopach mapping and gas management system performance data.

If BLC is unable to reduce the emissions below 500 ppm or reverse observed adverse month to month trend in the isopach maps through implementation of the actions described above, a temporary geosynthetic cap will be installed. In addition, BLC will initiate temporary cap construction activities on intermediate grade slopes within eighteen (18) months of establishing the slope regardless of the presence of SEM readings at or above the 500 ppm action level.

Following installation of temporary cap, areas will be periodically inspected to ensure they are functioning as intended and to identify area requiring maintenance/repair. Temporary cap will remain in place until the area receives additional waste or the area will be final capped. When removing areas of temporary cap, the material will be removed in sections to minimize the amount of intermediate slope exposed.

**BETHLEHEM LANDFILL
EMHANCED SURFACE MONITORING
FOLLOW-UP FORM**

Survey Date	Data Download	Isopach Completed	Observations	Improvements (If Applicable)
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>		

Attachment D

Form I Table I-2

**TABLE I-2
INSPECTION FREQUENCY AND MAINTENANCE PLAN
(ACTIVE LANDFILL OPERATION)**

Feature	Inspection Frequency	Maintenance
Construction Entrance	Daily and after all runoff events.	Remove any sediment at the surface of the stone construction entrance to prevent soil from tracking onto public roads.
Culverts	Daily and after all runoff events until upslope areas are stabilized (when there is at least a uniform, 70 percent vegetative cover established over the entire area).	Monitor the flow through the culverts to be sure the pipes are adequately diverting all stormwater.
Proposed Channels and/or Ditches	Weekly and after all runoff events (minimum weekly), until the drainage areas are stabilized (when there is at least a uniform, 70 percent vegetative cover established over the entire area).	Remove sediment/debris as necessary to maintain the total design depth.
Silt Fence	Daily and after all runoff events (minimum weekly) until drainage areas are stabilized (when there is at least a uniform, 70 percent vegetative cover established over the entire project area).	Repair any eroded channel(s) beneath the silt fence or sags or collapses in the silt fence due to runoff flowing over the top by providing stone filter outlets. Remove any sediment from behind the silt fence when it accumulates to 1/3 to 1/2 the height of the fabric.
Vegetation	Weekly and after all runoff events (minimum weekly), until stabilized (when there is at least a uniform 70 percent vegetative cover established over the entire project area).	Seeding, fertilizing, and mulching as required (refer to the revegetation measures for more information).
Dust	Minimum weekly	Add moisture, vegetate, or apply mulch to open bare areas during dry periods.
Temporary Control Measures and Facilities	Weekly and after all runoff events (minimum weekly), until stabilized (when there is at least a uniform, 70 percent vegetative cover established over the entire project area).	Remove sediment/debris and perform repair as necessary (within 24 hours) to conform with installation specifications.
Sedimentation Basins	Weekly and after all runoff events (minimum weekly), (Use post rain event inspection form).	Remove sediment/debris and perform repair as necessary (within 24 hours) to conform with installation specifications.

Attachment E

Post Rain Event Inspection Form

**BETHLEHEM LANDFILL
POST RAIN EVENT INSPECTION**

DATE:	ESTIMATED RAINFALL:
INSPECTOR:	REVIEWED:*

ROAD MAINTENANCE

ROAD	MAINTENANCE NEEDED			REPAIRS NEEDED
	WATERED	SWEPT	WASHED	
Loop @ scale area				
Paved Entrance				
Haul road to West/top of landfill				
Haul road to East/North				
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 East of shop						
2. North Slope West of shop						
3. South Slope East of Flare						
4. South Slope West of Flare						
5. West Slope						

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						

ANCHOR TRENCH - DRAINS FLOWING &/OR UNOBSTRUCTED?

	FLOWING		UNOBSTRUCTED		DESCRIPTION SCHEDULED REPAIRS
	YES	NO	YES	NO	
SOUTH PERIMETER TOE DRAINS					

*** MUST BE REVIEWED BY ONE OF THE FOLLOWING: DISTRICT MANAGER, OPERATIONS MANAGER, COMPLIANCE MANAGER, ENGINEERING MANAGER**