



May 13, 2020

Ms. Rachel Miller  
Compliance Specialist  
PA Department of Environmental Protection  
2 Public Square  
Wilkes-Barre, PA 18711-0790

Re: Bethlehem Landfill Company - Response to the April 29, 2020 Notice of Violation

Dear Ms. Miller:

In response to the Pennsylvania Department of Environmental Protection's (PADEP) April 29, 2020 Notice of Violation relative to the sites current capping status, Bethlehem Landfill Company (BLC) offers the following:

As background, on December 9, 2019 Leslie Huhn, Lower Saucon Township Manager, submitted a letter to Roger Bellas, PADEP Waste Management Program Manager, stating that BLC was out of sequence relative to final capping at the site. On December 17, 2019, a meeting was held at BLC with Roger Bellas, Matt Glogowski from PADEP, Kevin Bodner from Martin & Martin, and David Pannucci and Astor Lawson of Waste Connections. At that time, the site conditions and the filling operations were reviewed. A follow up meeting was held on March 3, 2020 with the PADEP staff, BLC staff, and Martin & Martin. During this meeting, PADEP indicated that the situation was being reviewed and possible enforcement, a Notice of Violation (NOV), was being considered for not providing closure of areas where the final lift of refuse was placed within 1 year.

While preparing a response to the NOV, BLC reviewed the last 2 years of flyover mapping for the 2018 and 2019 Annual Operations Reports which indicates that the majority of the uncapped area of the Bethlehem Landfill is not and has not been to final grade. The Northwest corner, the peak, and the upper portion of the South slope in the Phase IV area were not filled to final grades in late 2017 and early 2018. Going forward, as part of BLC's capping efforts, these areas will be filled to grade before capping construction commences, as shown on the attached plan, to promote proper drainage and stormwater controls as designed.

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

*website*  
*NOV 04-29-20*

BLC is submitting the attached "Proposed Capping Schedule" in an effort to reduce the amount of uncapped area. This plan will bring BLC into general compliance with the intent of the permit drawings. There are two slight modifications from the permit drawings which BLC will address in a minor permit modification to the PADEP. These are:

- The stockpile area will be capped as part of the last capping effort, the Western Slope.
- As shown on the "Proposed Capping Schedule", BLC is proposing to utilize temporary capping on the North slope. This temporary cap system will be the same as is currently permitted which will include utilizing Wind Defender overtop the geomembrane as a ballast system and for aesthetics.

BLC trusts that this plan addresses the concerns that were raised. In the event there are any questions concerning this, please do not hesitate to contact BLC.

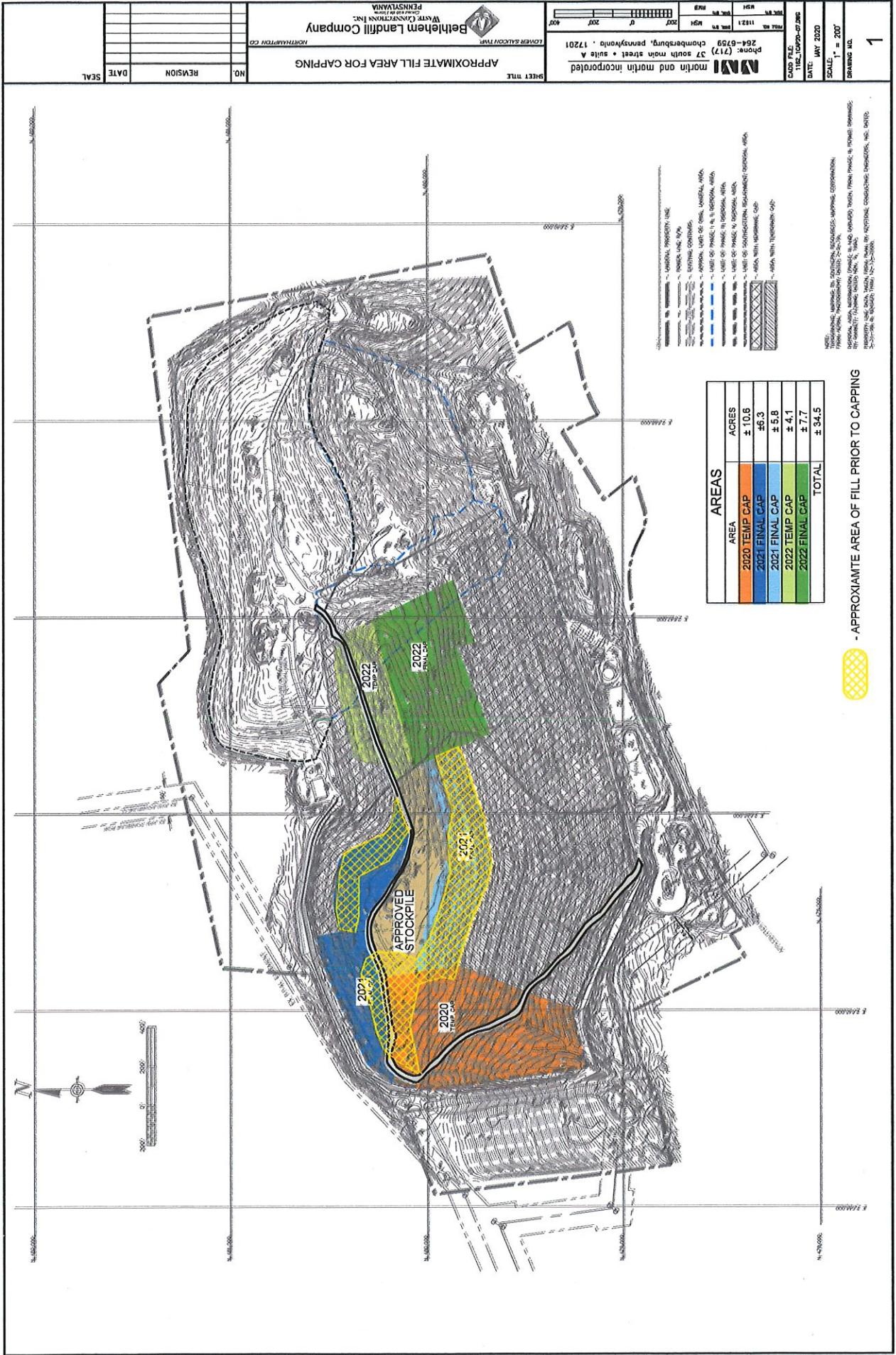
Sincerely,



David Pannucci  
Regional Engineer

Enclosure

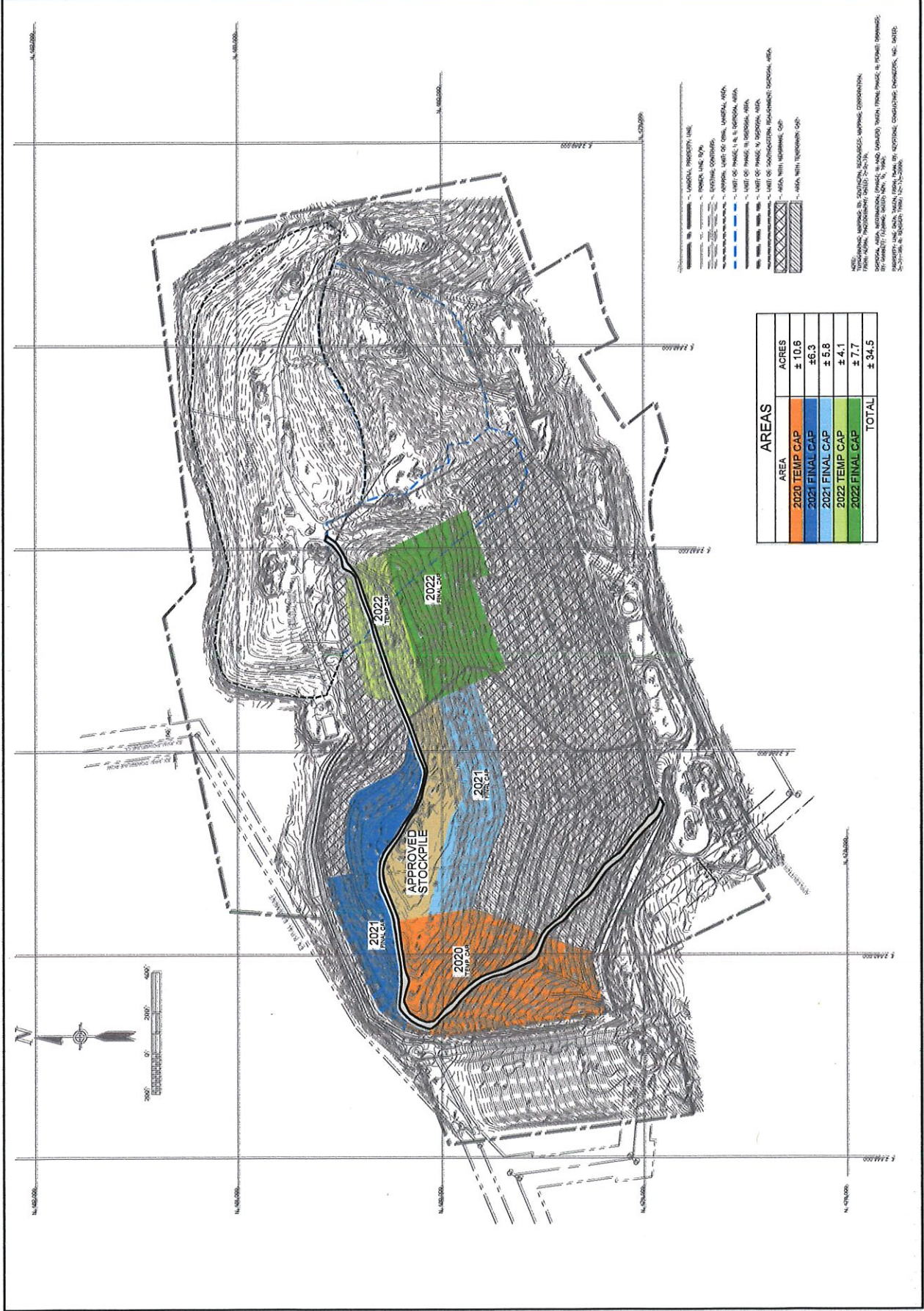
Cc: Roger Bellas, PADEP  
Leslie Huhn, Lower Saucon Township  
Martin & Martin  
File



AREAS	
AREA	ACRES
2020 TEMP CAP	± 10.6
2021 FINAL CAP	± 6.3
2021 FINAL CAP	± 5.8
2022 TEMP CAP	± 4.1
2022 FINAL CAP	± 7.7
<b>TOTAL</b>	<b>± 34.5</b>

- APPROXIMATE AREA OF FILL PRIOR TO CAPPING





AREA	ACRES
2020 TEMP CAP	± 10.6
2021 FINAL CAP	± 6.3
2021 TEMP CAP	± 5.8
2022 TEMP CAP	± 4.1
2022 FINAL CAP	± 7.7
<b>TOTAL</b>	<b>± 34.5</b>

- GENERAL PROPERTY LINE
- PROPERTY LINE
- EXISTING CONDITIONS
- APPROX. LIMIT OF OVERLAND FLOW
- LIMIT OF PHASE 1 TO 3 ORIGINAL AREA
- LIMIT OF PHASE 1 TO 3 REDESIGNED AREA
- LIMIT OF PHASE 1 TO 3 ORIGINAL AREA
- AREA WITH EXISTING CAP
- AREA WITH TEMPORARY CAP

THE ENGINEER HAS REVIEWED THE INFORMATION PROVIDED AND HAS FOUND IT TO BE ACCURATE AND COMPLETE. THE ENGINEER'S REVIEW IS LIMITED TO THE INFORMATION PROVIDED AND DOES NOT CONSTITUTE A GUARANTEE OF THE ACCURACY OF THE INFORMATION PROVIDED. THE ENGINEER'S REVIEW IS LIMITED TO THE INFORMATION PROVIDED AND DOES NOT CONSTITUTE A GUARANTEE OF THE ACCURACY OF THE INFORMATION PROVIDED.