BETHLEHEM LANDFILL COMPANY

BETHLEHEM LANDFILL
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WASTE CONNECTIONS'
Spill Prevention, Control and Countermeasure Plan
(SPCC PLAN)

October 22, 2020

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EXHIBIT

BLC 115

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BETHLEHEM LANDFILL COMPANY SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

1.0 INTRODUCTION

1.A. GENERAL APPLICABILITY AND CONFORMANCE [40 CFR 112.1 & 40 CFR 112.2]

The Spill Prevention Control and Countermeasures (SPCC) Plan applies to owners or operators of facilities that drill, produce, gather, store, process, refine, transfer, distribute, use, or consume oil and oil products, and might reasonably be expected to discharge oil in quantities that may be harmful to, into or upon navigable waters of the United States or adjoining shorelines, or waters of the continuous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act, or affecting certain natural resources. A facility, as defined by 40 Code of Federal Regulations (CFR) Part 112.2, is "any mobile or fixed, onshore or offshore building, structure, installation, equipment, pipe, or pipeline used in oil well drilling operations, oil production, oil refining, oil storage, oil gathering, oil transfer, oil distribution, and waste treatment, or in which oil is used."

This SPCC Plan has been prepared in compliance with the guidelines outlined in 40 CFR Part 112 and 30 TAC §334.129, titled: "Release Reporting and Corrective Action for Above-ground Storage Tanks (AST's)".

By order of the Environmental Protection Agency (EPA), 40 CFR Part 112 Oil Pollution Prevention, all facilities engaged in the above mentioned activities that meet any of the following criteria shall have an SPCC Plan:

1. The facility is non-transportation related.

2. The total underground, buried storage capacity of the facility (including storage capacity contained in operating equipment) is greater than 42,000 gallons.

3. The aboveground storage capacity of the facility is greater than 1,320 gallons. (This aboveground storage capacity applies to containers with a capacity of 55 gallons or greater, as well as the storage capacity in operating equipment.)

4. The facility, due to its location, could reasonably be expected to discharge oil into or upon the navigable waters of the United States or that the discharge of spilled petroleum products could reasonably be expected to discharge oil into or upon the navigable waters of the United States or that the discharge of spilled petroleum products could reasonably be expected to reach the waters of the United States.

The primary objective shall be to prevent spills and second to contain spills should they occur, thus preventing any discharge of petroleum products from non-transportation related activities at on shore and offshore facilities into or upon the navigable water of the United States.

A "harmful quantity" is defined as a discharge, which affects the water quality standards, or causes a film or sheen upon or discoloration of the water or adjoining shoreline. "Navigable water" is defined as waters of the United States including but not limited to all streams, creeks, lakes and ponds connected to the tributary system in a river basin.

1.B. OBJECTIVE OF THE SPCC PLAN

The objective of this Spill Prevention Control and Countermeasure (SPCC) Plan is to (1) prevent the occurrence of oil spills by the use of sound engineering and management controls, (2) where a spill occurs prevent the discharge of oil and other regulated material into "navigable waters of the United States", (3) prevent exposure of personnel and the community, (4) prevent contamination of the environment, and (5) provide an expeditious and effective response to minimize the potential for environmental impairment.

1.C. GENERAL INFORMATION

This plan has been designed for the Bethlehem Landfill, PA Department of Environmental Protection Operating Permit No. 100020, to comply with all applicable requirements of Environmental Protection Agency's (EPA's) regulations under the provision of 40 CFR Part 112 and the Commonwealth of Pennsylvania regulations under the PA Department of Environmental Protection (PaDEP). Direct information regarding 40 CFR 112.4 – 112.15 (July 2002) begins in Section 2.0 of the Document.

This facility is a PaDEP approved Municipal Solid Waste Landfill located at 2335 Applebutter Road, Bethlehem, PA 18015.

The owner/operator of this facility is PA Bethlehem Corp., whose principal address is located at the same address.

The individual responsible at this facility to coordinate all efforts to effectively prelude this SPCC Plan and to implement the required actions/appropriate actions as stated within this SPCC Plan is the facility manager who is also the primary emergency coordinator. In the event of the emergency coordinator's absence, the individuals identified in Table 1 shall serve as back up SPCC coordinators.

1.D. DESCRIPTION OF THE FACILITY

The Bethlehem Landfill consists of approximately 206 acres of land and is located in Lower Saucon Township, Northampton County, Pennsylvania. The nearest receiving body of water is the unnamed tributary to East branch of the Saucon Creek.

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Facility Type: Type I Municipal Solid Waste Landfill

Facility Name and Mailing Address:

Bethlehem Landfill Company
2335 Applebutter Road
Bethlehem, PA 18015

There are aboveground storage containers with secondary containment at Bethlehem Landfill that are used for storage and dispensing of petroleum products and used oil. Drums and other small quantities of petroleum products are housed within the maintenance facility. The location of the maintenance facility is depicted on the site map presented as Attachment 1.

1. E. SPCC PLAN LOCATION

A completed (and up-to-date) copy of this plan shall be maintained at the facility if the facility is attended at least four (4) hours per day or at the nearest field office if not. The plan must be made available to the EPA Regional Administrator for on-site review during normal working hours.

2.0 AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR [40 CFR 112.4]

The plan required submittal to the EPA Regional Administrator (RA) or the appropriate state agency if "a discharge occurs in excess of 1,000 U.S. gallons in a single discharge; or two (2) discharges in excess of 42 US gallons, or 1 barrel, within any twelve month period". In this case, the plan shall be submitted to the appropriate EPA Regional Administrator and to the appropriate state agency in charge of water pollution control activities within 60 days from the time the facility becomes subject to the above-mentioned requirements.

In addition, the owner or operator must also provide the same information provided to the EPA to the PaDEP so that the PaDEP may conduct a review of the facility and incident, and make recommendations to the RA as to further procedures, methods, equipment and other requirements of equipment necessary to prevent and to contain discharges of oil from the facility. The RA has the authority to require a facility owner or operator to amend the SPCC Plan after the on-site review of the Plan.

3.0 AMENDMENT OF SPCC PLAN BY OWNER OR OPERATOR [40 CFR 112.5]

This SPCC Plan will be amended whenever there is a change in the facility design, construction, storage capacity, operation or maintenance which will affect the potential for the discharge of oil and/or other material into navigable waters of the United State. These amendments will be fully implemented as soon as possible, but not later than six (6) months after such change occurs. The

owner or operator must document completion of the review and evaluation, and must sign a statement as shown in Attachment 2. Any technical amendments to the SPCC Plan shall be certified by a Professional Engineer (P.E.); however, minor changes or revisions non-technical in nature (i.e. changes in personnel or numbers listed in the tables or attachments) may be revised by the owner or operator of the facility.

Notwithstanding compliance to amend the SPCC Plan in accordance with the guidelines reflected in the aforementioned paragraph, a complete review and evaluation of the SPCC Plan will be conducted at least once every five (5) years form the date that the facility become subject to the SPCC Plan requirement, and/or five (5) years form the date the last evaluations of the SPCC Plan was conducted.

4.0 POTENTIAL SPILLS – PRECIDTION AND CONTROL [40 CFR 112.7(a)] AND FAULT ANALYSIS [40 CFR 112.7(b)]

This facility has not experienced a reportable oil spill event during the twelve months prior to January 10, 1974 (effective date of 40 CFR Part 112) and has not experienced a reportable oil spill to date or within the last 12 months. A spill history record will be completed for any reportable oil spill referenced above and can be found at Attachment 3. Appendix A of this plan details emergency procedures in the event a spill occurs on-site.

A potential spill analysis has been prepared for every petroleum product used at this facility and can be found at Attachment 4. Attachment 4 identified all petroleum sources at this facility, provides a prioritized list of areas where spills are likely to occur, and includes a prediction of the direction, rate of flow, and total quantity of oil, which could be discharged from the facility as a result of each type of failure. A breakdown of storage tanks is included in Table 2.

The aboveground storage tanks of this facility handle, store, and distribute petroleum products in the form of diesel fuel and other petroleum products for the purpose of use in operation of on-site equipment and other miscellaneous vehicles. Used oil is also stored at the site. A site plan showing property boundaries and adjacent roadways, drainage ditches, on-site boundaries and storage tanks is included in Attachment 1.

5.0 FACILITY LOCATION, DRAINAGE, AND SECONDARY CONTAINMENT [40 CFR 112.7(c) AND 40 CFR 112.7(d)]

The aboveground storage tanks are located within the boundaries of Bethlehem Landfill.

As per 40 CFR 112.7(c), appropriate containment and diversionary structures or equipment to prevent discharged oil from reaching a navigable watercourse is provided in the following subsections. These structures may include, but are not limited to:

- Dikes, berms, or retaining walls sufficiently impervious to contain spilled oil
- Curbing
- Drip Pans

- Culverting, gutters, or other drainage systems
- Weirs, booms, or other barriers
- Retention ponds
- Sorbent materials
- Equipment available to create emergency diversion basins in the event of a significant release.

Evaluation of the containment, diversionary structures, or equipment listed above or in 40 CFR 112.7(c) is ongoing to maintain the integrity of the equipment and its functional design.

As per 40 CFR 112.7(d), an effective oil spill contingency plan following the provision of 40 CFR Part 109 shall be provide along with a written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

6.0 INSPECTION, SECURITY, TRAINING, AND SPCC PLAN AMENDMENT REQUIREMENTS [40 CFR 112.7(e)-(i)]

Inspections required by this part shall be in accordance with the procedures developed for the facility. Copies of the records of inspections signed appropriately shall be made a part of the SPCC Plan and maintained for a period of three (3) years. Records of inspections and tests kept pursuant to usual and customary business practices are sufficient for the purpose of 40 CFR 112.7(e)(8) and this plan.

6. A. INSPECTIONS AND RECORDS [40 CFR 112.7(e)]

All aboveground tanks will be visually inspected by a competent person at a minimum of once a month for condition and need for maintenance. The Aboveground Storage Tank Inspection Form is shown in Attachment 5. A record of the inspection will be retained at the facility. Theses inspections shall be kept on file a minimum of three (3) years. The result of the inspection will be reported to the SPCC coordinator immediately. The following is a guideline of procedures to be initiated during the inspection of all storage tanks.

1. Inspect the foundation and supports of tanks that are above the surface of the ground. Visible leaks from a tank and its appurtenances will be promptly corrected.

2. Note if any stormwater accumulated within the dike area should be released.

3. Note if there is any sheen or discoloration on the surface of the accumulated stormwater.

4. If there is any sheen or discoloration on the surface of the accumulated stormwater, contact the SPCC coordinator immediately.

5. For each tank, inspect all valves, pipelines, pipeline supports, flange joints, metal surface of tanks, and containment dike for any leaks, damage, or operational problems.

6. For each tank, verify valves are locked in the closed position.

7. For each tank, verify that all warning signs are in place.

8. For each tank, verify that the lighting is functional and provide appropriate lighting for the discovery of spills occurring during hours of darkness, and the prevention of spills that may occur as a result of vandalism.

9. For each tank, verify that the peripheral fencing for the facility/tank, if required, is in good condition.

10. Carefully examine for deterioration any buried pipeline that is exposed for any reason. Buried metallic piping installations should have a protective wrapping and coating, or the equivalent, and should be catholically protected. (If applicable)

11. The inspector will inform the SPCC coordinator of any discrepancies and recommend the appropriate corrective action that must be implemented in a prompt manner.

12. The inspector will place the completed inspection in the facility's records.

6. B. PERSONNEL TRAINING [40 CFR 112.7(f)]

Training is an integral part of this SPCC Plan to assure that it is effectively implemented. At a minimum, applicable oil-handling employees will be trained in the areas of operation and maintenance of equipment, general facility operations, loading and unloading procedures, inspection procedures, emergency spill response procedures, and the contents of this plan.

Employees will be aware of all applicable pollution control laws, rules and regulations. Annually scheduled training sessions for the operating personnel shall be conducted to assure an adequate understanding of the SPCC Plan. New employees who will have oil-handling responsibilities shall have initial training within the first six months of employment and annual training thereafter.

This training will be updated at least annually or as required by conditional changes or should the need become apparent to include more effective prevention and control measures. The following is an outline of the specific SPCC Plan training requirements.

1. Operation and Maintenance of Equipment:

    a. A physical walk-through inspection of the area where petroleum storage tanks are located and a review of the SPCC Plan to make employees aware of all areas where the possibility for a leak or spill could occur.

b. Personnel are instructed on the proper operation of equipment to prevent oil, gasoline, diesel fuel and other regulated material releases. A brief overview is given on how to repair the equipment in the event of a spill.

2. Loading/Unloading Procedures:

   a. Personnel are instructed that there will be NO SMOKING on or about any motor vehicle, while loading or unloading petroleum products and/or used oil.

   b. Personnel are instructed that extreme care shall be taken in the loading or unloading of petroleum products into or from any motor vehicle to keep fire away and to prevent persons in the vicinity from smoking, lighting matches, or carrying any flame or lighted cigar, pipe or cigarette.

   c. Personnel are instructed that no petroleum products shall be loaded into or on, or unloaded from any motor vehicle unless the handbrake is securely set and all other reasonable precautions are taken to prevent motion of the motor vehicle during such loading or unloading process.

   d. Personnel are instructed that a motor carrier who transports petroleum products by a cargo tank must ensure that the cargo tank is attended by a qualified person at all times during unloading.

   e. Personnel are instructed that a delivery hose, when attached to the cargo tank, is considered a part of the vehicle.

3. Inspection Procedures:

   a. Personnel are instructed that all aboveground storage tanks are to be visually inspected by a competent person for condition and need for maintenance on a scheduled periodic basis. Such examination will include the foundation and supports of tanks that are above the surface of the ground. Visible leaks from a tank and its appurtenances will be promptly corrected.

   b. Personnel are instructed to inspect any exposed buried line for deterioration. If corrosion damage is found, additional examination and corrective action will be taken based upon the magnitude of the damage.

   c. Personnel are instructed to examine/inspect the general conditions of all aboveground valves and pipelines, flange joints, pipeline supports, locking of valves, and metal surfaces. In addition, periodic pressure testing may be warranted for piping areas where drainage is such that a failure may lead to a spill event if there is reason to suspect the integrity of the piping.

4. Emergency Spill Response Procedures:

a. Personnel are trained on the appropriate use of the on-site spill prevention equipment.

b. A complete review of the SPCC and contingency plans is performed and employees are instructed on containment of a spill, cleaning up the material, proper material storage, and disposal techniques in accordance with all governing regulations.

c. Personnel are trained on proper notification procedures to be used in the event of a spill.

d. In the event an additional temporary secondary containment needs to be built, or the existing containment needs reinforcing, all employees are instructed on how to build a temporary containment area.

6. C. SECURITY [40 CFR 112.7(g)]

The facility shall be fully fenced and locked when not in attendance. Only authorized personnel, or people accompanied by an authorized person, are permitted to conduct petroleum product and/or used oil-handling operations in and around the aboveground storage tanks.

The master flow and drain valves and any other valves that will permit outward flow of a tank's contents to the surface should be securely locked in the closed position when in non-operating or non-standby status.

Per 40 CFR 112.7(g), it has been determined that illumination of the aboveground storage tank during hours of darkness is not required due to the distance of the tank from the general public and the absence of operating personnel during hours of darkness.

When the aboveground storage tanks are not in service during non-operating hours the petroleum product container dispensing system electrical switch will be in the off position and locked. The dispensing hoses for the aboveground storage tanks will be properly drained and coiled/wrapped/secured on a storage rack to prevent any inadvertent spill of liquid contained within the hose.

6. D. LOADING AND UNLOADING (EXCLUDING OFFSHORE FACILITIES) [40 CFR 112.7(h)]

The facility has the capabilities for the loading and unloading of fuels with the exception of a specific design containment pad. Catch basins for spillage of diesel fuel and lubricants shall be utilized should a spill occur during loading and unloading operations. Operational and maintenance procedures are in place to prevent spills and initiate clean-up of any minor spills.

There is sufficient clayey earthen material to construct berms for containment of petroleum product and/or used oil if a spill should occur. Spill containment and clean-up material will be stored in a designated area within the maintenance shop and will be readily available for use in

the unlikely event of a spill. All clean up and contaminated material will be properly disposed in accordance with all governing regulations.

Sorbent pads, earthen material, sandbags, "kitty litter", straw bales, or other inert materials will be used to contain, divert and clean up the spill if the spill has not been contained by a dike, sump, or catch basin. A ditch or diversionary trench may also be excavated in the event of a spill to prohibit any spilled materials from reaching navigable waters of the United States, waters of the Commonwealth of Pennsylvania, or from leaving the property.

6. E. BRITTLE FRACTURE EVALUATION REQUIREMENTS [40 CFR 112.7(i)]

Evaluation shall be conducted for field-constructed aboveground containers undergoing repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure due to fracture or other catastrophe.

6. F. CONFORMANCE WITH STATE REQUIREMENTS [40 CFR 112.7(j)]

As discussed in Section 1.A. GENERAL APPLICABILITY AND CONFORMANCE, this SPCC Plan has been prepared in compliance with State rules, regulations, and guidelines. This Plan is also complemented by the previously enacted Preparedness, Prevention and Contingency (PPC) Plan.

7.0 ONSHORE FACILITY REQUIREMENTS (EXCLUDING PRODUCTION FACILITIES [40 CFR 112.8 AND 40 CFR 112.12]

7. A. DRAINAGE [40 CFR 112.8(b) & 112.12(b)]

Where feasible, petroleum storage tank areas are diked to prevent spills. Walls of the diked area shall be of earth, steel, concrete, plastic, or solid masonry designed to be liquid-tight and to withstand a full hydrostatic head. Drainage from each diked area shall be controlled either by dual manually operated gate valves (normally closed and locked) or by elimination of any piped outlet.

The use of ponds and lagoons around undiked areas may not be feasible at this facility. However, the use of combination of booms, curbs, sorbent materials, and other effective methods will be used to contain and clean up a spill. The specific control management practices used is described below.

Drainage (releasing) of rainwater form secondary containment shall not occur without the authorization of the facility manager or their designee. Before release of stormwater form the containment area, it will be verified by visual inspection (Attachment 5) that there is no sheen or discoloration of the surface water (Facility Manager shall consult Stormwater Pollution Prevention Plan for guidance and record keeping as applicable). If water quality is suspect, the inspector will contact the facility manager for instructions.

7. B. BULK STORAGE TANK CONTAINMENT [40 CFR 112.3(c) & 112.12(c)]

No tank should be used for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature, etc.

Containment and diversionary structures will be used to prevent oil or other regulated material from reaching navigable waters. The types of secondary containment utilized at this facility are double wall tank containment and metal containment. Dikes, containment curbs, and pits may be employed in the event of a spill. A ditch or diversionary trench may also be excavated in the event of a spill to prohibit any spilled materials from reaching navigable waters of the United States, waters of the Commonwealth of Pennsylvania, or from leaving the property. Four AST tanks with containment and various 145, 275 and 55 gallon drums (housed in the maintenance building) containing motor fluids are located on-site.

Leakage of oil or other regulated material from any equipment or location such as valves or pumps must be controlled by using drip or catch pans, absorbents or other means of secondary containment.

Drainage of rainwater from any diked area will not be emptied into a storm drain, open watercourse, lake, or pond. New and old tank installations are fail-safe engineered or updated to avoid spills. Liquid level sensing device (if installed) shall be inspected on a regular basis to ensure proper operation.

No underground storage tanks are utilized at this site. Aboveground storage tanks shall be inspected on a regular schedule, or when material repairs are completed, to include a visual inspection of tank integrity, valves, footing, etc. Aboveground storage tanks shall be visually inspected monthly and the inspection recorded on the form in Attachment 5. See Section 6.0 of this document for specific inspection practices. Internal heating coils are not used at this facility.

Visible oil leaks, which result in a loss of oil from tank seams, gaskets, rivets, and/or bolts sufficiently large enough to cause the accumulation of oil, shall be immediately corrected.

7. C. BRIEF OVERVIEW OF SPCC PLAN (LOADING AND UNLOADING FACILITIES) [40 CFR 112.8(d) & 112.12(d)]

The facility has the capabilities for the loading and unloading of fuels with the exception of a specific design containment pad. Catch basins for spillage of diesel fuel and lubricants shall be utilized should a pill occur during loading and unloading operations. Operational and maintenance procedures are in place to prevent spills and clean-up of any minor spills.

There is sufficient clayey earthen material to construct berms for containment of petroleum product and/or used oil if a spill should occur. Spill containment and clean up material will be stored in a designated area within the shop and will be readily available for use in the event of a

spill. All clean up and contaminated material will be properly disposed in accordance with all governing regulations.

Sorbent pads, earthen materials, sandbags, "kitty litter", straw bales, or other inert materials will be used to contain, divert and clean up the spill if the spill has not been contained by a dike, sump, or catch basin. A ditch or diversionary trench may also be excavated in the event of a pill to prohibit any spilled materials from reaching navigable waters of the United States, waters of the Commonwealth of Pennsylvania, or from leaving the property. The mobile storage units are typically parked over areas of solid waste fill which also contain runoff controls for containment or the designated parking spot with containment located at the Fuel Storage Area near the maintenance building.

Underground pipes, pipelines, or pipe supports are not utilized for the use of hydrocarbon or chemical storage at this facility.

At the present time, two 500 gallon stationary aboveground storage tanks of diesel fuel and gasoline are at the facility for facility trucks and heavy equipment that are located near the maintenance shop. One mobile diesel fuel truck (approximately 3,600 gallon capacity) is located onsite for equipment fueling due to the need to keep the mobile tank on waste fill area, and the necessity for solid waste fill area to advance. In addition a 500 gallon gas tank is on-site to fuel the odor suppressant sprayer line.

Warning signs must be placed at a conspicuous location adjacent to the position of stationary aboveground storage tanks.

All petroleum product and/or used oil transfers will be attended by facility personnel or tanker truck driver and never left unattended. The checklist in Attachment 6 may be used as procedural guidelines (1) to unload petroleum contents into the onsite aboveground storage tanks and (2) to prevent premature vehicular departure during unloading operations.

Drains and outlets on tank truck must be checked for leakage before loading/unloading or departure.

7. D. NATIONAL FIRE PROTECTION ASSOCIATION DECALS FOR ABOVEGROUND STORAGE TANKS

Shown at Attachment 7 are the appropriate National Fire Protection Association (NFPA) decals/markings to be displayed on the sides of the aboveground storage tanks (AST) containing flammable and combustible liquid products and antifreeze.

7. E. SPILL POTENTIAL

Equipment and leak prevention apparatuses such as gaskets, pumps, valves, fittings and diking must be maintained and operated in a manner that minimizes failures, leaks, spills or other

incidents that could result in the release of fuel oil or other material form the equipment. Due to the preventive maintenance program, the spill potential is low for the storage tanks.

In the event that a spill should occur, it would probably occur at one of the valves. If a leak or drip is discovered, catch pails will be used as a temporary measure to prevent the loss of material until the equipment can be permanently repaired. Permanent repairs will be made as soon as reasonably possible after detection of the problem. Absorbent materials such as sorbent pads, earthen material, sandbags, "kitty litter", straw bales, or inert material will be available.

8.0 OIL PRODUCTION FACILITY REQUIREMENTS [40 CFR 112.9, 112.10, 112.11, 112.13, 112.14 AND 112.15]

8. A. OIL PRODUCTION FACILITIES [40 CFR 112.9 & 112.13]

This facility does not produce, manufacture, or refine petroleum.

8. B. OIL DRILLING AND WORKOVER FACILITIES [40 CFR112.10 & 112.14]

This facility is not directly involved in oil drilling, oil production, or mining facilities.

8. C. OIL DRILLING, PRODUCTION, OR WORKOVER FACILITIES (OFFSHORE) [40 CFR 112.11 & 112.15]

This facility is not directly involved in the drilling, production, or reworking of offshore petroleum facilities.

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TABLE 1

SPCC COORDINATORS

SPCC Primary Coordinator:	Astor A. Lawson	Title: District Manager Office Phone: 610-317-3200 Cell Phone: 805-471-7948
SPCC Secondary Coordinator:	Cody White	Title: Compliance Manager Office Phone: 610-317-3200 Cell Phone: 610-390-5536
SPCC Secondary Coordinator:	Fred Brown	Title: Maintenance Manager Office Phone: 610-317-3200 Cell Phone: 484-429-0805

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TABLE 2
STORAGE TANKS DESIGN DETAILS

Tank No.	Capacity (gallon)	Product Stored	Tank Construction Material (Carbon, steel, etc.)	Exempted or Registered[1]	Vapor Recovery System[2]	Secondary Containment Type	Direction of Flow
1	500	Diesel Fuel AST	Carbon Steel	Registered	No	Double Wall	Flat area, overall drainage area to southern watershed.
2	275	Oil Tank/Heat	Carbon Steel	Registered	No	Double Wall	Flat area, overall drainage area to southern watershed.
3a. 3b.	500 500	Gasoline AST Gas AST – line sprayer	Carbon Steel	Exempted	No	Double Wall Containment	Flat area, overall drainage area to southern watershed.
4	3,600	Fuel Truck	Carbon Steel	Exempted	No	N/A Mobile	Dependent on where located at time of release mostly southern watershed.
5	Varies	Various petroleum products, motor fluids in 275 and/or 55 gallon drums	Carbon Steel	Exempted	No	Block containment area and/or containment pallets	Concrete floor, overall building drainage to the south.
6	Varies	Waste Oil, 275 and/or 55 gallon drums	Carbon Steel	Exempted	No	HDPE Containment	Concrete floor, overall drainage to the south.
7	1,000	Waste Oil	Carbon Steel	Exempted	No	Steel Double Wall	Overall drainage to the south.
8	145	Used Antifreeze	Poly	Exempted	No	Poly	Overall drainage area to southern watershed.
9	275	New Antifreeze	Carbon Steel	Exempted	No	Steel Double Wall	Concrete floor, overall building drainage to the south.

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TABLE 2
(Continued)

Tank No. 1: Diesel Fuel Storage Tank

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Carbon Steel
c. Tank compatible with diesel fuel: Yes
d. Quantity of product: up to 500 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping from secondary containment: Dependent on location at time of discharge.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Double wall design of the tank
h. Location of Substance: fuel storage area near the maintenance shop

Tank No. 2: Oil Heat Tank

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Carbon Steel
c. Tank compatible with waste oil: Yes
d. Quantity of product: stored in 275 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping to the southern watershed.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Steel fabricated with the tank
h. Location of Substance: Fuel storage area near the maintenance building.

Tank No. 3: Gasoline

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Carbon steel
c. Tank compatible with gasoline: Yes
d. Quantity of product: 500 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping from secondary containment: Southern watershed.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Double wall constructed steel tank.
h. Location of Substance: Fuel storage area near the maintenance shop and line sprayer.

Tank No. 4: Diesel Fuel Tank (on service truck, portable)

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Carbon steel
c. Tank compatible with diesel fuel: Yes
d. Quantity of product: 3,600 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping from secondary containment: Dependent on location at time of discharge.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Dependent upon where tank is located at any given time. The tank is normally stationed over waste fill, near the active face, in areas where surface runoff is prevented by dikes.

h. Location of Substance: Varies.

Tank No. 5: Various motor fluid products in 275, 245 and/or 55 gallon drums

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Carbon steel
c. Tank compatible with product stored: Yes
d. Quantity of product: Varies, typically in 275 gallon tanks total < 1,500 gallons.
e. Direction of flow of the contained substance in the event of an accidental release escaping from secondary containment: South, towards solid waste fill area
f. Rate of Flow: See Attachment 4
g. Secondary Containment: steel containment for 275/245 gal tanks and pallet containment for drums.
h. Location of Substance: Maintenance Facility, See Attachment 1

Tank No. 6: Waste Oil Storage Tank (inside Maintenance Shop)

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Carbon steel
c. Tank compatible with waste oil: Yes
d. Quantity of product: stored in 275 gallons and/or 55 gallon drums up to 750 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping from maintenance building to the southern watershed.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Yes – steel, the tanks are located in the maintenance shop; there are no floor drains in the shop.
h. Location of Substance: Maintenance Building

Tank No. 7: Waste Oil Storage Tank (outside maintenance shop)

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Carbon Steel
c. Tank compatible with waste oil: Yes
d. Quantity of product: stored in 1,000 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping from maintenance building to the southern watershed.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Double Wall
h. Location of Substance: maintenance building

Tank No. 8: Used Antifreeze Storage Tank (maintenance shop)

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Polyethylene
c. Tank compatible with used antifreeze: Yes
d. Quantity of product: stored in 145 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping from maintenance building to the southern watershed.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Polyethylene
h. Location of Substance: maintenance building

Tank No. 9: New Antifreeze Storage Tank (maintenance shop)

a. Major Type of Failure: Leakage, Rupture, Overflow
b. Tank constructed of: Polyethylene
c. Tank compatible with used antifreeze: Yes
d. Quantity of product: stored in 145 gallons
e. Direction of flow of the contained substance in the event of an accidental release escaping from maintenance building to the southern watershed.
f. Rate of Flow: See Attachment 4
g. Secondary Containment: Polyethylene
h. Location of Substance: maintenance building

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TABLE 3

BETHLEHEM LANDFILL CONTACTS

SPCC Primary Coordinator:	Astor A. Lawson	Title: District Manager Office Phone: 610-317-3200 Cell Phone: 805-471-7948
SPCC Secondary Coordinator:	Cody White	Title: Compliance Manager Office Phone: 610-317-3200 Cell Phone: 610-390-5536
SPCC Secondary Coordinator:	Fred Brown	Title: Maintenance Manager Office Phone: 610-317-3200 Cell Phone: 484-429-0805

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TABLE 4

AGENCY CONTACTS

In case of a release to the environment, the following entities shall be contacted:

Fire, Police, and Ambulance (for emergencies)
911

2.	D.E.P. Emergency Response (24 hour)	877-333-1904
3.	National Response Center	800-424-9902
4.	Lower Saucon Township	610-865-3291
5.	Northampton County Emergency Management Agency	610-759-2600
6.	PaDEP – Harrisburg Northeast Regional Office	570-826-2511
7.	EPA 24-Hour Number	215-597-9898
8.	Northampton County	610-829-6500
9.	Emergency Fire Personnel	911
10.	Poison Control Center	800-521-6110

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

U.S. EPA — 215-597-9825
Region III
165 Arch Street
Philadelphia, PA 19106

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

PA Fish Commission — 717-626-0228
Southeastern Regional Office
P.O. Box 8
Elm, PA 17521

In the event of a hazardous waste spill:

National Response Center — 800-424-8802
Washington, DC


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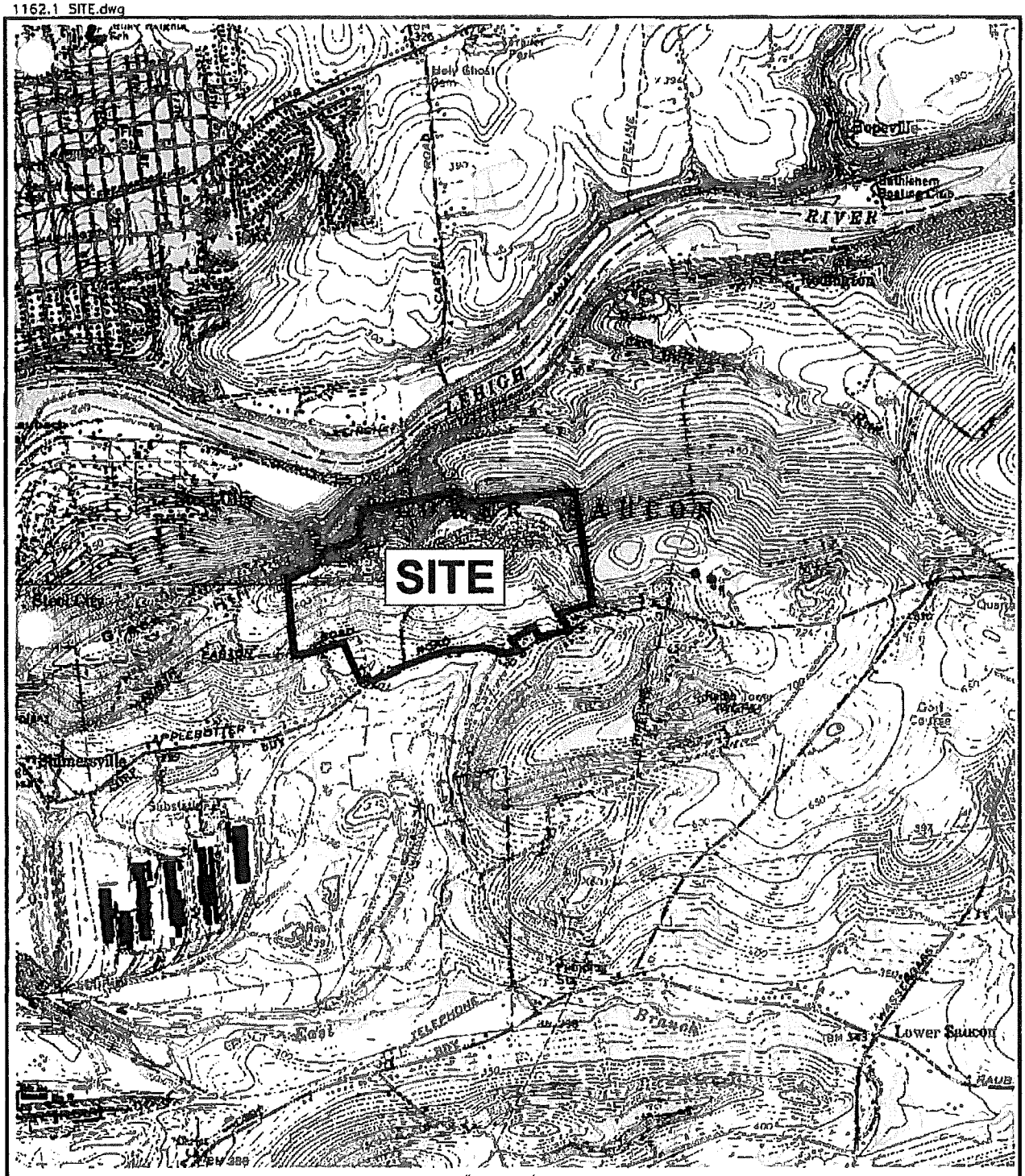
ATTACHMENT 1

SITE MAPS
(2)

1162.1 SITE.dwg



MAP 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

SITE MAP

LOWER SAUCON TWP. NORTHAMPTON CO

PA Bethlehem Landfill Corp.
2335 Applebutter Road Bethlehem, Pennsylvania 18015

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ATTACHMENT 2
PLAN REVIEW & AMENDMENTS

I have completed review and evaluation of the SPCC Plan for Bethlehem Landfill on

_____, 2020, and **will / will not** amend the Plan as a result.
(Circle one)

Authorized Representative _____

Signature:_____Date:_____

List of Revisions

Number	Date	Author	Signature of Authorized Representative
1			
2			
3			
4			
5			

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ATTACHMENT 3
SPILL HISTORY

(Complete this form for any reportable spill(s) which has (have) occurred during the twelve months prior to January 10, 1974 (effective date of 40 CFR Part 112), or within the last 12 months into navigable waters).

1. Date:_____ Volume:_____ Cause:_____

   Corrective Action Taken:_____

   Plans for Preventing Recurrence:_____

2. Date:_____ Volume:_____ Cause:_____

   Corrective Action Taken:_____

   Plans for Preventing Recurrence:_____

3. Date:_____ Volume:_____ Cause:_____

   Corrective Action Taken:_____

   Plans for Preventing Recurrence:_____

Name of Facility:_____

Signature of SPCC Coordinator:_____

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ATTACHMENT 4

POTENTIAL SPILLS – PREDICTION & CONTROL

SOURCE	MAJOR TYPE OF FAILURE	TOTAL QUANTITY (GALLONS)	RATE OF FLOW	DIRECTION OF FLOW	SECONDARY CONTAINMENT
Tank No. 1	(a) Leakage	500	*Gradual to Instantaneous	South	Double Wall
Diesel Fuel	(b) Rupture	500	*Instantaneous		Yes
	(c) Overflow	500	*100 gpm		N/A
Tank No. 2	(a) Leakage	275	*Gradual to Instantaneous	South	Double Wall
Oil Heat	(b) Rupture	275	*Instantaneous		Yes
Tank	(c) Overflow	275	*20 gpm		Yes
Tank No. 3 a. & b.	(a) Leakage	500	*Gradual to Instantaneous	South	Double Wall
Gasoline	(b) Rupture	500	*Instantaneous		Yes
	(c) Overflow	500	*20 gpm		N/A
Tank No. 4 (Mobile)	(a) Leakage	3,600	*Gradual to Instantaneous	Varies on location	N/A
Diesel Fuel	(b) Rupture	3,600	*Instantaneous	generally	N/A
Tanker	(c) Overflow	3,600	*100 gpm	South	N/A
Tank No. 5 Various	(a) Leakage	<275	*Gradual to Instantaneous	Inside Shop	Inside Shop
Motor Fuels	(b) Rupture	<275	*Instantaneous		Yes
Tank No. 6	(a) Leakage	<275	*Gradual to Instantaneous	Inside Shop	Inside Shop
Used Oil	(b) Rupture	<275	*Instantaneous		Inside Shop
Tank No. 7	(a) Leakage	<1,000	*Gradual to Instantaneous	South	Yes
Used Oil	(b) Rupture	<500	*Instantaneous		Outside Shop
Tank No. 8 Used	(a) Leakage	<145	*Gradual to Instantaneous	South	Yes
Antifreeze	(b) Rupture	<100	*Instantaneous		Outside Shop
Tank No. 9	(a) Leakage	<275	*Gradual to Instantaneous	South	Inside Shop
New Antifreeze	(b) Rupture	<100	*Instantaneous		

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ATTACHMENT 5

ABOVEGROUND STORAGE TANKS MONTHLY INSPECTION FORM

Facility Name:_____
Date:_____Inspected By:_____

Aboveground Storage Tanks:

- Visible signs of fuel or lubricant leaks _____
- Visible cracks along the seams and joints _____
- Visible cracks on the surface of tanks (sides, top and/or bottom)_____
- Presence of required fire protection code warning signs/labels on the surface of the tanks_____
- Fire extinguisher in good condition, visible, accessible, securely mounted, marked and tagged_____
- Visible signs of paint peeling from exterior surface of tanks_____
- Visible signs of corrosion on the exterior metal surface of tanks_____
- Visible leaks at valves, pipelines and flange joints connected to tanks_____
- Vapor recovery system or vapor release system in good condition_____

NOTES:_____

_____

Aboveground Storage Tanks Support Systems:

- Visible stains on concrete_____
- Collapse of pavement in places_____
- Visible signs of corrosion on the external metal surface support system_____
- Visible cracks in the metal support system_____
- Visible crack in the concrete surface_____

NOTES:_____

_____

Secondary Containment:

- Visible cracks in the secondary containment walls (earth, steel, concrete or solid masonry dikes, berms/walls)_____
- Visible signs of leaks outside the secondary containment_____
- Visible signs of deterioration of the secondary containment walls (earth, steel concrete or solid masonry dikes, berms/walls)_____
- Accumulation of storm water within the diked/bermed area_____
- Sheen or discoloration on the surface of accumulated stormwater within the diked/bermed area:
  If **NO**, then discharge appropriately_____
  If **YES**, has SPCC Coordinator been notified and appropriate measures been taken?_____
  Provide detailed notes.
- Drain plug secured within the drain pipe to the secondary containment wall_____
- Containment area clean/free of litter_____

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ATTACHMENT 5 (continued)

NOTES:_____

_____

Appurtenances:

- Visible cracks on the hoses attached to the storage tanks dispensing pumps_____
- Adequately security of hoses to ensure no spillage of substances outside of containment_____
- Warning signs in place_____
- Valves, dispensing pumps secured/locked when storage tank is unattended_____
- Lighting of the storage tanks is functional_____
- SPCC Plan spill response equipment and material are on hand and in serviceable condition_____
- Peripheral fencing, if required, in good condition_____
- Visually inspect audible alarms and/or high level gauges to verify working order_____

NOTES:_____

_____

Unloading and Loading Area:

- Visible signs of leaks/spills on the ground where unloading/loading operations of petroleum product are conducted_____
- Warning signs present at the aboveground storage tanks to prevent vehicular departure before disconnect of transfer lines_____
- Visually inspect for adequate security (fencing entire facility)_____
- Visually ensure proper lighting at or near petroleum storage tanks_____

NOTES:_____

_____

Signature of Inspector:_____

Date:_____

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ATTACHMENT 6

UNLOADING CHECKLIST

1. Ensure that no one (person) smokes on or about any motor vehicle while loading or unloading any petroleum product and/or used oil.

2. Extreme care shall be taken in the loading or unloading of any petroleum product and/or used oil into or from any motor vehicle to keep fire away and to prevent persons in the vicinity from smoking, lighting matches, or carrying any flame or lighted cigar, pipe, or cigarette.

3. No material shall be loaded into or on, or unloaded from, any motor vehicle unless the hardbrake is securely set and all other reasonable precautions are taken to prevent motion of the motor vehicle during such loading or unloading process.

4. A motor carrier who transports petroleum product by a cargo tank must ensure that the cargo tank is attended by a qualified person at all times during unloading.

5. Ensure that the motor carrier cargo tank hose connections are constructed of aluminum or brass fittings.

6. Contractors are required to conduct a walk around inspection of the aboveground storage tanks before transferring products and report to the Facility Supervisor if leaks are detected. If there is a leak detected, the motor carrier driver will not transfer product until corrective action is taken.

7. The appropriate Facility Supervisor should be notified upon arrival of the cargo carrier so that a pre-check of the exterior conditions of the aboveground storage tank can be conducted prior to transfer of product.

8. The motor carrier must ensure that the ground cable from the cargo tank to the receptacle (Aboveground Storage Tank) is connected prior to dispensing petroleum product.

SPECIFIC CONTROL MANAGEMENT PRACTICES

1. Proper coupling of hose connections prior to loading and unloading operations.

2. Pre-inspection of the exterior area of aboveground storage tanks to check for leaks, condition of tanks and appurtenances.

3. A Facility Employee "attends" loading and unloading of petroleum product for use in business operations.

4. If a minor spill or leak occurs, Facility Personnel apply absorbent material (i.e. *Absorb-N-Dry* absorbs oil, grease, odors, moistures and liquids) to the impacted area, and allow the absorbent material to absorb the spilled liquid.

5. Sweep up/clean up the contaminated spill area (absorbent material) and properly dispose of the contaminated material.

6. Shut down/close the appropriate valve for each connecting line to the aboveground storage tank should a line break during loading or unloading operations.

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ATTACHMENT 6

UNLOADING CHECKLIST
(continued)

7. Open air vent line attached to the top surface of aboveground storage tanks prior to loading and unloading operations.

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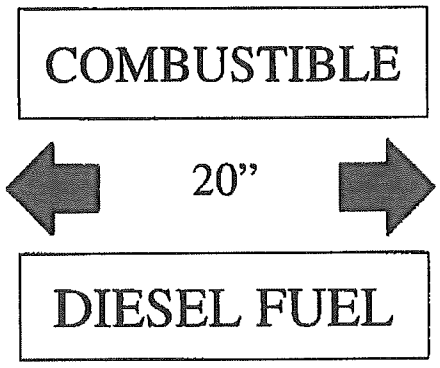
ATTACHMENT 7

NATIONAL FIRE PROTECTION ASSOCIATION (NFPA)
DECALS/MARKINGS FOR DISPLAY ON
ABOVEGROUND STORAGE TANKS (AST)

The following diagrams show the appropriate decals/markings/signage to be placed on the sides of the ASTs (275 gallons to 10,000 gallons AST) containing combustible (diesel fuel) liquid products. These appropriate markings meet the criteria of the Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), National Fire Protection Association (NFPA), Insurance Code, and County and State Fire Marshall's office.

1. Aboveground Storage Tank containing combustible liquid product – diesel fuel.

SIDE VIEW OF AST



(NOT DRAWN TO SCALE)

NOTES:

a. Dimension of Pressure Sensitive Decals
(Combustible) (Diesel Fuel): 4 inches wide x 20 inches long

b. Color Coding: Red Letters; White Background

c. Size of Letters: 3 inches

d. Number of Decals: One (1) each for each side of AST

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ATTACHMENT 8

TITLE 40 CODE OF FEDERAL REGULATIONS (CFR) TITLE 112 (REVISED JULY 2005) (Partial)

This document may be viewed in its entirety at:

www.epa.gov/sites/production/files/2014-04/documents/b_40cfr112.pdf

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ATTACHMENT 9

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

Facility Name: Bethlehem Landfill Company

Facility Address: 2335 Applebutter Road, Bethlehem, PA 18015

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

   Yes_____ No__X___

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

   Yes_____ No__X___

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR 112, Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

   Yes_____ No__X___

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR 112, Appendix C, Attachment C-III or a comparable formula) such that a discharge form the facility would shut down a public drinking water intake?

   Yes_____ No__X___

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

   Yes_____ No__X___

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Print Name: Astor A. Lawson

Signature: 

Title: District Manager

Date: 10/22/2020

ATTACHMENT 9

BETHLEHEM LANDFILL
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CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST
(continued)

ENGINEER CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR Part 112, attest that this Spill Prevention Control and Countermeasures (SPCC) Plan has been prepared in accordance with good engineering practices.

Engineer: Kevin Bodner

Signature: [signature]

Date: 10/27/20

MANAGER CERTIFICATION

Name of Facility: Bethlehem Landfill Company

Type of Facility: MSW Landfill

Year of Initial Facility Operation: 1941 as City of Bethlehem Landfill

Location of Facility: 2335 Applebutter Road, Bethlehem, PA 18015

Name and Address of Owner: Bethlehem Landfill Company
2335 Applebutter Road
Bethlehem, PA 18015

Designated Person Responsible for Spill Prevention (SPCC Coordinator):
Name: Astor A. Lawson
Title: District Manager

Assistant SPCC Coordinator:
Name: Cody White
Title: Compliance Manager

Oil Spill History: This facility has not had a known major reportable oil spill event during the preceding 12 months.

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ATTACHMENT 9
CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST
(continued)

Management Approval

This SPCC Plan has been reviewed and approved by management at a level with the authority to commit necessary resources for implementing the Plan. The programs and procedures outlined in the Plan will be implemented and periodically reviewed and updated in accordance with 40 CFR Part 112, as amended and applicable state and local requirements.

Signature: _____ Date: 10/22/2020

Name: Astor A. Lawson
(Printed)

Title: District Manager

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ATTACHMENT 10

STATE NOTIFICATON

Notification to the PA Department of Environmental Protection would be primary with other agency notifications.

Refer to
Table 4 and Appendix A.2.

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APPENDIX A
EMERGENCY RESPONSE, NOTIFICATION & SPILL CLEAN-UP

1.0 EMERGENCY SPILL RESPONSE PROCEDURES

Prompt response to a spill is the best means of minimizing any impact to the environment and in particular, preventing a discharge reaching the water of the United States. In the event of a spill of a petroleum product, the employee first becoming aware of the spill will assume the roll of temporary emergency coordinator until he/she can notify the primary emergency coordinator. If the temporary spill coordinator is unable to notify either the primary spill coordinator or any of the back-up emergency coordinators, then he/she will assume the responsibility of implementing the emergency spill response procedures to protect the public health and safety and the environment.

1.A. ASSESSMENT OF HAZARD

Upon notification of a petroleum related spill, the spill coordinator will determine the hazard potential of a spill response by determining at least the following factors:

1. The substance spilled and its hazard potential.
2. The quantity of substance spilled and the extent of the area impacted by the spilled substance.
3. The source of the leakage/spill.

Where appropriate, the spill coordinator shall consult with the facility Safety Manager to determine the potential hazard of the substance spilled to the employees and to the surrounding public.

If a spill is determined to be of such a magnitude that it cannot be safely and effectively controlled by facility personnel, then the coordinator shall promptly notify outside emergency response agencies to obtain assistance to control and clean up the area impacted. A list of contacts can be found in Appendix A.2. and Table 4.

1.B. SECURE SPILL RESPONSE AND PERSONAL PROTECTIVE EQUIPMENT

Upon determination of he hazard potential of the spilled substance, the spill coordinator shall direct employees to obtain the appropriate spill response equipment and to wear the required Personal Protective Equipment (PPE). Employees will be informed regarding the location of spill response equipment and PPE during orientation and during routine training. Shown in Appendix A.3. is a list of the spill response equipment and personal protective requirements for responses to oil pollution and/or other regulated material spills at the facility.

Employees are not to issue spill response equipment and Personal Protective Equipment (PPE) without having been trained on the proper use and limitations of the equipment.

1.C. CONTAINMENT AND ELIMINATING SPILL SOURCE

Upon obtaining the proper spill response equipment and PPE, the spill responder(s) shall first attempt to contain the spill so as to prevent its entry into a storm sewer, a ditch or any conveyance that eventually discharges to the waters of the United States. Examples of equipment and media that can be used to contain spills include, but are not limited to sorbent pads, earthen material, sandbags, "kitty litter", straw bales, and inert material.

At the same time that containment is being placed or as soon as possible after placement of containment, the spill responder(s) shall attempt to seal or otherwise stope the source of the spill. Common methods of eliminating a spill source include, but are not limited to closing valves, apply leak stopping compound for pinhole leaks, insert leaking 55 gallon drum within drum over packs, deactivating pumps, and diverting flow to another pathway.

2.0 SPILL CLEAN UP AND MITIGATE ENVIRONMENTAL IMPACT

Once the spill is contained and the source eliminated, the spill responders shall collect the spilled material by the appropriate manner and place the material into secure containers.

The area or surface in contact with the spilled material shall be decontaminated by an appropriate method that is permissible under Local, State, and Federal laws. The specific method used will depend upon the substance, the availability of permitted sewer discharge to a POTW, regulatory standards applicable to wastes, and other factors. The SPCC Spill Coordinator will select the appropriate decontamination method after determining the applicable facts and by conferring either with the regulators or a professional in the subject of spill response.

All spill material and debris will be managed in a manner that fully complies with applicable Local, State and Federal laws regarding recycling or disposal of wastes. The preferred method is to recycle or reclaim materials from spills in an effort to minimize waste generation. Where this is not feasible or allowed, then the collected spilled material will be disposed of in accordance with applicable Local, State and Federal laws.

3.0 NOTIFICATION OF COMPANY AND GOVERNMENTAL AGENTS

3.A. IMMEDIATE NOTIFICATION OF A SPILL

1. Any spill of a petroleum substance shall be reported immediately to the primary emergency coordinator or the alternate emergency coordinator by the employee who first notices the spill.

2. The primary emergency coordinator or in his/her absence, the alternate emergency coordinator shall notify the appropriate governmental authorities whenever a spill exceeds the reportable quantities required under State or Federal law as listed below.

    a. In accordance with 40 CFR 112.4(a) the Federal reportable quantities are:

        i. A discharge in excess of 1,000 gallons in a single event or

ii. Two (2) discharges in excess of 42 U.S. gallons, or 1 barrel, within any twelve month period.

b. The Commonwealth of Pennsylvania's Reportable Quantities (PA Code Title 25 pg. 262.46) Reporting and Clean-up of Surface Spills and Overfills) are:

i. Spill or overfill of petroleum that results in a release to the environment that exceeds 5 gallons (hazardous waste), or that causes a sheen on nearby surface water, or

ii. Spill or overfill of hazardous substance that results in a release to the environment that equals or exceeds its reportable quantity under CERCLA (40 CFR Part 302).

3.B. SEQUENCE OF EVENTS FOR NOTIFICATION PROCEDURES

The following is a sequence of events for notification procedures in the event of a discharge and/or release of petroleum product and/or used oil from Bethlehem Landfill.

The procedures outline responsibilities for notifying Bethlehem Landfill, local county, state and federal agencies, law enforcement authorities, nearby communities and adjacent landowners and businesses of a potential release or spill from the Bethlehem Landfill which may have a significant effect outside the boundary of the landfill property.

Internal Notification

The first person becoming aware of an emergency situation will immediately notify the primary coordinator. The primary coordinator or designee will assess the situation to determine any possible hazard to human health or the environment that may result from the release or spill and determine if the SPCC Plan will be implemented.

If the primary coordinator determines that the facility has had or may have a release or spill of petroleum product and/or used oil, which could threaten human health or the environment, the following actions will be taken:

1. Assess the incident and estimate the amount (quantity) of petroleum product and/or used oil that has been or will be released.

2. Notify the Primary Coordinator or emergency response team leader who will take appropriate action to implement emergency spill/release response procedures to contain, control, and clean up the release (discharge), and/or spill.

3. Initiate an emergency response form shown in Appendix A.2. and record the following information within the form:

   a. Description of material spilled and/or released (discharged);

   b. Date and time of the incident;

c. Location of the incident;

d. Source and cause of incident;

e. If a spill, estimated volume of the spill, present and anticipated movement, including any petroleum product and/or used oil reaching navigable water of the United States and/or waters of the state;

f. Equipment, apparatus or storage tank that was involved;

g. Measures taken to control the incident;

h. Weather conditions at the time of the incident (i.e. rain, snow, hail);

i. The wind direction and speed;
j. Type of clean-up operations and effectiveness of clean-up;

k. Persons on the scene and the person to contact for information;

l. Any persons injured as a result of the spill and/or release; and,

m. Time estimate on how long the release and/or discharge will last.

4. The appropriate Landfill Contact persons to alert on noted in Table 3.

Agency Notification

In the event of an unauthorized discharge or release of petroleum product and/or used oil of twenty-five (25) gallons or more onto land or any quantity into a water environment that results or imminently threatens to result in an emergency condition, the primary coordinator or his designee will notify the appropriate agencies immediately, **but in no case later than 24 hours after discovery of the release (discharge) or spill**. This notification will be by telephone, and then followed by written notification. Written notification will directly follow with clean-up documentation.

In the event that a significant unauthorized discharge or release of petroleum product and/or used oil of twenty-five (25) gallons or more onto land or any quantity into a water environment of the state occurs, but does not constitute an emergency condition, the primary coordinator or his designee will notify the agencies promptly, but in no case later than 24 hours after learning of the unauthorized discharge. This notification will be by telephone.

The designated telephone numbers to be used to notify the respective agencies are located in Table 4.

The following is a list of relevant information to be reported to local, state, and federal authorities via telephone regarding the nature of the release (discharge) and/or spill:

1. Name of the person making the notification and telephone number where any return calls can be received from appropriate agencies.

2. Name and location of facility or site where the unauthorized discharge is imminent or has occurred.

3. Date and time the incident began and ended or estimated time of continuation if discharge is continuing.

4. Extent of any injuries and identification of any personnel hazards which response agencies may face.

5. Common or scientific chemical name, D.O.T. hazard classification and the best estimate of amount of any or all discharged or released pollutants.

6. Brief description of the incident that will be sufficient to permit response agencies to formulate the level and extent of response activity.

Written Notification

Written reports (Appendix A.1.) of unauthorized discharge/release/spill incidents of 1,000 gallons in a single event or two (2) discharges in "harmful quantities" within any twelve (12) month period will be submitted to federal, state, and county agencies in addition to verbal notification in accordance with federal regulations. This written notification will be submitted within 15 calendar days after verbal notification.

The written notification reports will include the following listed data:

1. Name of persons and company filing the written report;

2. Name, address, and telephone number of the owner/operator of the facility;

3. Time and date of verbal notification, name of person making the notification, and identification of the facility from which the unauthorized discharge occurred;

4. Type of incident (e.g. spill, discharge, release);

5. Dates, times, and duration of the unauthorized discharge and if not corrected, the anticipated time it is expected to continue;

6. Name and quantity of material(s) involved;

7. Details of the circumstances and events leading to any emergency condition;

8. Common or scientific name, D.O.T. hazard classification, and best estimate of amounts of any or all discharged pollutants, including methodology for calculations and estimates;

9. Statement of actual or probable fate or disposition of the pollutant;

10. Assessment of actual or potential hazards to human health or the environment, where applicable;

11. Remedial actions taken, or to be taken, to stop unauthorized discharges or to recover pollutants;

12. Estimated quantity and disposition of recovered material that resulted from the incident; and,

13. Procedures or measures which have or will be adopted to prevent a recurrence of the incident.

3.C. DISCHARGE/RELEASE/SPILL CLEAN-UP

The following procedures are to be adhered to when responding to and cleaning up a discharge/release/spill:

1. Any material spilled will most likely be contained within the facility through the use secondary containment, temporary earthen berms, diversion ditches, booms, or equivalent containment measures. If for some unforeseen reason the spill reaches flowing water, storm sewers, tec., the first employee at the scene of the discharge/release/spill location will initiate notification procedures immediately and will also initiate measures to prevent any additional material from reaching the navigable waters of the United States and waters of the Commonwealth.

2. In the event a spill occurs and the material is contained within the secondary containment area, the containment structure will immediately be inspected to assure that the secondary containment walls are intact.

3. In the event that the secondary containment wall is leaking, a temporary berm will be constructed using available equipment and supplies located on-site.

4. All clean-up personnel in direct contact with petroleum product and/or used oil or performing the actual clean-up tasks will wear personal protective clothing and equipment to include rubber boots, coveralls, and disposable gloves to prevent contamination to individuals personal clothing or his/her skin.

5. In some cases, if the discharge/release/spill is minor, absorptive material may be used to clean-up the discharge/release/spill. If used, the absorptive material should be spread on the contaminated area and left in place as long as necessary to ensure that all spilled material has been absorbed. The contaminated material and any contaminated soil will then be cleaned up and properly disposed in an approved manner.

6. If the material spill is too large to be cleaned up using sorbent material, then all free flowing petroleum product and/or used oil contained within the secondary containment area will be pumped into an appropriate storage container, solidified with an approved solidification agent and properly disposed at an approved disposal facility.

7. All surfaces exposed to the spilled petroleum product and/or used oil will be appropriately decontaminated.

8. It is the responsibility of the primary coordinator or his designee to assure that all material has been decontaminated and properly disposed of in accordance with all federal, state and local regulations.

3.D. DISCHARGE/RELEASE/SPILL RESPONSE AND NOTIFICATION REPORT FORM

A discharge/release/spill response and notification report form to be completed in the event of an unauthorized discharge/release/spill of petroleum product and/or used oil can be found in Appendix A.2.

3.E. SPILL RESPONSE AND PERSONAL PROTECTIVE EQUIPMENT

A list of equipment and material available for use in cleaning up a spill can be found in Appendix A.3.

BETHLEHEM LANDFILL
Safety · Integrity · Service

APPENDIX A.1.

EMERGENCY EVENT INVESTIGATION REPORT

The following is an example of a written notification to the appropriate agency.

Regional Administrator
U.S. EPA Region III
165 Arch Street
Philadelphia, PA 19106

Dear Sir/Madam:

Pursuant to 40 CFR Part 112, Section 112.4 Amendment of SPCC Plans by Regional Administrator, ____

_____ Herein notifies you of the following:

1. Name of facility:_____
2. Name(s) of the owner or operator of the facility:_____
3. Location of the facility:_____
4. Date of initial facility operation:_____
5. Maximum storage or handling capacity of the facility and normal daily through put: _____
   _____
6. Description of the facility, including maps, flow diagrams, and topographic maps: _____
   _____
7. Attached is a complete copy of the SPCC Plan with amendment.
8. A description and cause(s) of the incident, including the date, times, and duration, the common scientific name of spilled pollutant, estimated amount spilled, failure analysis for system or subsystem in which the failure occurred: _____
   _____
9. Time and date of verbal notification, name of person making the notification, and identification of the facility from which the unauthorized discharge occurred: _____
   _____
10. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements and the disposition of recovered material: _____
    _____

11. Additional preventive measures taken or contemplated to minimize the possibility of recurrent: _

APPENDIX A.1.

EMERGENCY EVENT INVESTIGATION REPORT
(continued)

Please contact (**Name of Manager** or his designee) at (telephone number) if you have any questions on matters addressed in this correspondence.

Sincerely,

NOTE: A complete copy of all information provided to the U.S. EPA Regional Administrator pursuant to 40 CFR 112.4a shall be sent at the same time to the PaDEP in charge of water pollution activities in and for the state. In addition, a complete copy of all information shall be sent to Northampton County Emergency Management.

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APPENDIX A.2.

SPILL RESPONSE AND NOTIFICATION REPORT FORM

Incident & Response

Material Spill:_____

Date of Incident:_____ Time of Spill:_____

Quantity of Spilled Material:_____

Location of Spill:_____

Duration of Discharge:_____

Weather Conditions:_____

Wind Direction/Speed:_____

Equipment involved:_____

General Description of Incident:_____

_____

_____

Description of clean-up operations (equipment, materials, effectiveness, etc.):_____

_____

_____

Person Discovering Spill:_____

Person at the scene at time of spill:_____

Name of Emergency Coordinator/Site Manager Notified:_____

Persons injured during incident (names & description of injuries):_____

_____

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APPENDIX A.2.

SPILL RESPONSE AND NOTIFICATION REPORT FORM
(continued)

Notification

Name of Agency	PHONE NUMBER	DATE/TIME NOTIFIED	PERSON CONTACTED
Fire/Ambulance/Police	911		
PaDEP Emergency Number	866-852-0208		
National Emergency Response	1-800-424-8802		
Northampton County Emergency Mgmt. Coordinator	610-759-2600		
USEPA – Region 3 Philadelphia 24 hrs/day phone #	215-597-9825		

Additional Agency Notification (if required

Pa Fish Commission Southeastern Regional Office	717-626-0228		
Other Agency			

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APPENDIX A.3.

SPILL RESPONSE AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

The following is a list of equipment and material that may be available for use in cleaning up a spill:

1. Safety Glasses
2. Rubber Boots
3. Disposable Gloves
4. Sorbent Material – pads, booms, socks
5. Shovels/Scoops
6. Plastic Bags
7. Wheel Loader or equivalent
8. Clayey Earth Material
9. Coveralls, TYVEK
10. Back-Hoe, Earthmoving Equipment