



Pennsylvania Department of Environmental Protection

4530 Bath Pike
Bethlehem, PA 18017-9074
January 28, 2011

Bethlehem District Office

Ms. Deborah Patterson
Williams Township Manager
655 Cider Press Rd.
Easton, PA 18042



(610) 861-2070
FAX (610) 861-2072

RE: Chrin Brothers Sanitary Landfill
I.D. #100022
Williams Township, Northampton County

Dear Ms. Patterson:

Please find enclosed a copy of the report of an inspection performed by this District Office at Chrin Brothers Sanitary Landfill, Inc., located in your municipality. A copy of the inspection report is being provided to you pursuant to the provisions of Section 1101(a)(1) of Act 101, the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988.

Sincerely,

Dean J. Fisher
Solid Waste Supervisor
Waste Management Program

Enclosure





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

GENERAL INSPECTION REPORT

EFACTS INSP ID 1945382

Type of Inspection SPCRQ Facility Request	WM Identification Number MSW Permit 100022	Entry Time/Date 1/13/2011 0850 HRS	Exit Time/Date 1/13/2011 1400 HRS
Facility/Incident Name and Location Chrin Brothers Sanitary Landfill 635 Industrial Drive Easton, Pennsylvania 18042			Municipality Williams Township
			County Northampton County
Name, Address of Responsible Official Mr. Charles Chrin Chrin Brothers Sanitary Landfill 635 Industrial Drive Easton, Pennsylvania 18042		Title Owner/Operator	Telephone 610-253-6144
		Telephone 610-253-6144	Interviewed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Weather Conditions: 09:46 - 22.4°F, 62% Humidity, cloudy, with a NNW wind at 10 mph.			

On January 13, 2011 the Department of Environmental Protection ("Department") conducted an inspection at Chrin Brothers Sanitary Landfill ("Chrin"). This inspection was conducted to observe and evaluate Chrin's daily operations at the working face and nuisance load management procedures. Specifically the Department intended to observe the management of odorous loads of waste in accordance with its Nuisance Minimization and Control Plan (NMCP).

Ms. Jessica Wagoner, Solid Waste Specialist, Mr. Dean J. Fisher, Solid Waste Supervisor, and Mr. John Leskosky, Environmental Group Manager, were present on behalf of the Department. Landfill Manager Mr. Greg Chrin, Environmental Manager Mr. Joe Klobusicky, Operations Manager Mr. Cory Rosenberger, and Site Manager Mr. Ed Herman were present on behalf of Chrin.

Prior to entering the landfill, it was observed that no landfill related odors were noted on Morgan Hill Road or Industrial Drive.

Pre-Meeting:

Chrin's Odorous Load Log for January 12, 2011 was reviewed and noted the following nuisance loads: 08:22 (Grocery store waste), 09:34 (Sludge), 11:07 (Sludge), and 11:45 (Sludge). Chrin's patrol logs noted entries for 07:00 and 12:30 on January 12, 2011. During the 07:00 patrol, Chrin noted an isolated sewage plant odor at the Easton sewage treatment plant.

Chrin representatives advised that nuisance loads are not known until they arrive at the scale or, most often, unloaded at the working face. Chrin attempts to keep the working face small and incorporate/cover nuisance loads as deeply into the working face as possible.

Site Observations:

While on site the working face was observed. During this time several vehicles containing waste were observed unloading. Chrin had the mister bar located downwind and to the east of the working face. The location of the mister bar appeared to be an effective location due to wind speed/direction and in conformance with requirements. Chrin was actively applying water/odor neutralizer to the waste and working face.

During the Department's observations of the working face, a minimal/light landfill gas odor was observed of short duration. Chrin advised that the gas odor was originating from gas collection system maintenance immediately upwind of our position.

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One load of Bethlehem City wastewater treatment sludge (potential nuisance load) was received for disposal during this observation. While the sludge was being unloaded it was being sprayed with water/odor neutralizer. The sludge was dark brown in color did not appear to contain free liquids and appeared to conform to the appropriate generator certification and the Department permit disposal approval. Working face odors from this load of sludge were very light and intermittent. This sludge load did not appear to exhibit the intensity of odor characteristic to a "nuisance load".

Following unloading of the sludge, Chrin spread the sludge over the active working face by passing through and over it numerous times with equipment. When the sludge was spread over the working face and partially incorporated into the working face, Chrin then covered the sludge with other municipal solid waste. Representatives from the Department and Chrin were standing downwind of the working face during the active management of the sludge at the working face. As noted above, odors from the working face were light and intermittent and appeared isolated to the immediate area of the working face. The process from the time the sludge was unloaded to being incorporated into the working face was approximately ten (10) minutes.

No other nuisance loads (grocery store waste, sludge, etc) were accepted during this inspection.

The landfill was also inspected/toured via the perimeter/access roads. The weather station was viewed.

No odors were observed from Chrin's odor neutralizers. No neutralizer odor was detected from the mister bar or other site use of the odor neutralizer. Chrin reported that it does not utilize scented odor neutralizer.

Nuisance Minimization & Control Discussion/Suggestions

Identification/Receipt of Nuisance Loads

NMCP Section 4.3.1 - Implementing measures to assist/educate generators and waste haulers in evaluating changes to waste generation/storage that may reduce nuisances. Chrin was advised to document these efforts in the operating record of the facility.

Chrin maintains a nuisance load log in which Chrin documents, in part, the generator/source of a nuisance load. Chrin was advised to evaluate this data in order to identify those loads from generators/sources/routes which have a high likelihood or potential to be a nuisance load for the purpose of making arrangements for the unloading of the waste at the working face. Chrin Hauling Company employees should also be trained to identify nuisance loads upon collection and provide Chrin with advance notice of acceptance of the nuisance load. The Chrin scale house should also notify the working face when a potential or known nuisance load is on the scale.

Minimizing the receipt of unplanned nuisance loads may serve to reduce the working face logistics of managing nuisance loads and increase the efficiency of the working face. Furthermore, proactive planning for nuisance loads would include scheduling deliveries for when sufficient "regular" solid waste is available at the working face to cover the offensive load or when weather conditions would make nuisance load management impractical.

"Targeted" Nuisance Patrols

Chrin conducts routine daily nuisance patrols which are useful in documenting routine conditions. However, Chrin's documented patrols of January 12th were not in conjunction with the receipt of nuisance loads and therefore could not provide a full picture of potential nuisances. The Department suggested that there were benefits to conducting more thorough or "targeted" nuisance patrols in addition to the routine daily patrols. When an actual or potential nuisance

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load is received, Chrin could conduct odor patrols at the working face and surrounding area downwind when the waste is being unloaded and incorporated into the working face. If an odor is detected, Chrin could broaden its odor patrol to include offsite downwind locations of the working face as appropriate and take appropriate action at the working face to minimize the odor. Chrin should document observations and any corresponding corrective action in the operating record of the facility.

Application of Water/Odor Neutralizer at the Working Face

Application of the water/odor neutralizer at the working face is accomplished by a Chrin employee with a hose. The water/odor neutralizer is supplied from a tank truck. It was observed that despite best efforts by the Chrin employee, the water/odor neutralizer could not fully be applied over the entire working face thereby decreasing its effectiveness. Chrin discussed and should consider the use of additional hoses, higher pressure/volume hoses or water canons at the working face. Additional line or bar misters may also be beneficial in controlling nuisance odors.

Sludge/Nuisance Load Management at the Working Face

As described above, Chrin attempts to incorporate the receipt of sludge into the working face. The Department's observations revealed that the spreading of the sludge across the working face may increase exposure which may increase the potential for odor. Sludge was observed clinging to the equipment and some sludge appeared to remain visible after covering. The Department believes that a goal for handling the unloading of sludge and nuisance loads at the working face should minimize the tracking of the waste and incorporate and/or cover the waste as quickly as possible.

The use of "pits" or "trenches" for burial of nuisance loads was also discussed as a way to minimize tracking and provide for immediate burial of nuisance loads. The NMCP addresses the use of pits at section 4.3.3. These pits/trenches could be within the working face or adjacent to the working face. Chrin should also consider staging additional daily cover soil for use over the working face when a nuisance load is received. The NMCP addresses the use of additional daily cover at Section 4.3.3.

Other Comments and Considerations

1. While a litter problem was not observed during this site visit, the use of appropriate litter fencing was discussed.
2. The frequency and scope of routine daily nuisance patrols was discussed. It was generally understood that at a minimum three patrols would be conducted, the first prior to opening, the second during operations and the third at closing. Each patrol should be conducted on and offsite (with focus to downwind locations) with observations and corrective actions documented as appropriate. It was recommended that additional patrols or more frequent patrols should occur based on daily operational or construction activities and weather conditions.
3. The operations of Chrin are the sole responsibility of Chrin. While the Department has been requested to provide the suggestions above it is not implied, nor is it the intent, that these suggestions to be a final solution to odor minimization/control and nuisance prevention at Chrin. The day to day changing operational challenges of a landfill require that Chrin adjust its efforts accordingly to prevent nuisances.

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Closing Meeting

A summarized discussion of the above was conducted.

This report also includes additional comments as a result of further Department review concerning nuisance minimization and control.

No Waste Management Program violations were determined or observed during this inspection.

Post Inspection Odor Investigation:

The Department conducted additional investigation concerning alleged odors from Chrin's odor neutralizers. Chrin landfill was exited downwind of the mister bar, past the maintenance building and through the Tarragon property. No odors from the odor neutralizer were observed. Furthermore, properties along the landfill perimeter and off of Morgan Hill Road were visited and no odors from Chrin's odor neutralizers were observed. No solid waste, sludge, working face or landfill gas odors were observed.

Inspector Name Jessica L. Wagoner Solid Waste Specialist	Inspector Signature 	Headquarters PA DEPT ENV PROT Bethlehem District Office 4530 Bath Pike Bethlehem, PA 18017	Date 1/28/2011
Supervisor Name Dean J. Fisher Solid Waste Supervisor	Supervisor Signature 	Headquarters PA DEPT ENV PROT Bethlehem District Office 4530 Bath Pike Bethlehem, PA 18017	Date 1/28/2011
Responsible Official Mr. Greg Chrin	Signature of Responsible Official – Mailing Information Copy Sent First Class Mail & Facsimile	Title Landfill Manager	Telephone 610-253-6144

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations determined during the inspection. Additional notification of violations may be issued concerning either violations or observations noted herein, or other violations identified as a result of review of laboratory analyses, this matter or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.