



City of Bethlehem
10 E. Church Street
Bethlehem, PA 18018

February 10, 2023

Dear Mayor Reynolds, Honorable Members of Council and Mr. Boscola,

It has come to our attention that leachate from the landfill in Lower Saucon Township is treated at our Bethlehem City wastewater treatment plant. Leachate is formed when rain water percolates through a landfill. As the water contacts the decomposing solid waste it becomes contaminated, leaching out chemicals and constituents from the waste. Contaminants in leachate can include industrial chemicals, pharmaceuticals, heavy metals, etc. These contaminants are carcinogenic to humans and are harmful to aquatic life and drinking water.

As relayed to the EAC by Edward Boscola, Director of Water & Sewer Resources, the landfill has an Industrial Waste Discharge Permit issued by Bethlehem City that authorizes and regulates discharge of waste to the City's wastewater treatment plant. Permitting is governed by City Ordinance Article 923 and is regulated by the US EPA. Approximately 35 industries in our service territory are in this program and each company has an individual agreement with Bethlehem City. The permit involves a pre-treatment program in which these companies pay a surcharge for regulated pretesting. The list of contaminants and their allowable limits are regulated by the EPA.

Waste monitoring covers a host of pollutants including: BOD (biochemical oxygen demand), pH, suspended solids, ammonia, heavy metals, oil, grease and petroleum products. In addition to the customary charge for sewer flow the City applies surcharges based on the strength of the waste, i.e., concentration of pollutants in the waste stream and has the ability to assess penalties if the terms of the permit are violated. Permits are renewed from time to time and are modified if and when there are significant changes that affect waste discharge.

To quote Mr. Boscola: "In regard to the expansion of the landfill, the City's position is that this is an issue between the landfill and Lower Saucon Township. Any discussion on matters that affect their discharge permit as a result of expansion, such as changes in flow or waste strength, will be dealt with separately by the City and landfill through the permit process. This ensures independent oversight on these matters since we are responsible to EPA for enforcement."

However, the EAC has concerns with rainfall events, when flow spikes and the wastewater treatment plant receives an influx of stormwater runoff. It is our understanding that the City is in discussion with the landfill to have the landfill hold and store leachate onsite during these storm events and then release it slowly. The EAC strongly supports the design of onsite storage so that the treatment plant will be able to properly test and treat landfill waste after these peak stormwater events.

The EAC is also concerned about the effect of the expansion on recreation on the Lehigh River and the D&L Trail. The decimation of the mature forested area to make way for expansion would likely adversely impact the viewshed and transmit odors.

Our great appreciation to Mr. Boscola for his time and for educating us in regard to the treatment plant operations.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Ben Felzer, Vice Chair

Ben Guthrie, Secretary

Vibhur Kumar

Mandy Tolino

Mike Topping

Katie Trembler