

Hanover

Engineering Associates Inc



March 6, 2015

Mr. Jack Cahalan, Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015

RE: Inspection Conducted on March 6, 2015
IESI Bethlehem Landfill
Hanover Project LS90-7

Dear Mr. Cahalan:

The purpose of this letter is to report the results of the above-referenced "mid-meeting" inspection, which was conducted by me along with Allen Schleyer, Compliance Manager for IESI. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was not running. Mr. Schleyer stated that the plant has been down since February 23, 2015 due to technical problems.
2. The landfill flare was running at a flow rate of 3,170 Standard Cubic Feet per Minute (SCFM) and a temperature of 1660 degrees Fahrenheit. Mr. Schleyer stated that he turned on the largest blower on February 24, 2015 in response to the outage at the BRE plant in order to create the strongest possible draw of gas to the landfill flare. This inspector confirmed that the largest blower was in operation.
3. The truck wash was not in use due to frozen conditions.
4. No mud, blowing litter, or odor was observed along Applebutter Road, the entrance driveway, or at the landfill office upon my arrival at the facility. A slight landfill gas odor was observed at the landfill office at the end of the inspection at approximately 3:00PM.
5. No litter was observed in the trees within the perimeter fence or on the face of the MSE wall. Windscreens were in use at the working face. Wind direction during the inspection was predominantly from the west (blowing from), with an estimated speed of zero to five miles per hour (0-5 mph).
6. Garbage was being disposed of in Cell 4D, near the interface with Cell 4E. Two (2) trucks were off-loading and zero (0) trucks were waiting. The truck tipper was not actively being used at the time of the inspection.
7. All cover soil currently being used was previously imported. Mr. Schleyer reported that they have not had to import soil for a long time, due to the large amount already stockpiled onsite. No Alternative Daily Cover material is being used.
8. The west high wall was observed and appears to be substantially unchanged since the last inspection. No major slope failures along the wall were observed.
9. A slight odor was observed along the road at the base of the MSE wall. This odor is best described as a "sulfur" or "rotten egg" smell.
10. Neither the spray line along the northern perimeter nor the spray line along the southern access road was running at the time of the inspection. Mr. Schleyer has stated that they cannot be operated in below-freezing temperatures.

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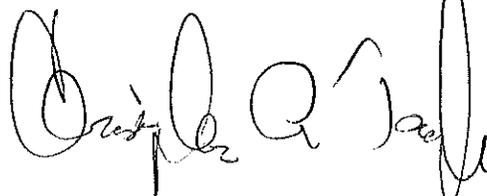
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11. A new control panel that will supply emergency power to Pump Stations 1, 2, and 3 in the event of a power outage was previously installed and is functional. Mr. Schleyer showed the location of the mounted panel, adjacent to the parking lot, and explained that it was hooked in to the main power feed coming into the facility. In the event of a power outage, IESI could station a large portable generator in the parking lot and hook it into the panel. This would provide power to leachate Pump Stations 1, 2, and 3.
12. No active work to construct new Cell 4E Stage 3 was taking place. This work was suspended pending better weather and site conditions.
13. This inspector conducted a patrol through Steel City, beginning at 3:10PM. No landfill-related odors or sounds were observed during this inspection. The inspection did not proceed through the Narrows as it usually does due to a concern over road conditions from the previous day's snowstorm.

If you have any comments or questions regarding any of the above, or find that you need additional information, please do not hesitate to call me immediately.

Respectfully,

HANOVER ENGINEERING ASSOCIATES, INC.



Christopher A. Taylor, PG, HMI
Host Municipality Inspector

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