

Hanover

Engineering Associates Inc

January 7, 2015



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

RE: Inspection Conducted on December 18, 2014
IESI Bethlehem Landfill
Hanover Project LS90-7

Dear Mr. Cahalan:

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

1. The Bethlehem Renewable Energy (BRE) plant was running.
2. The landfill flare was running at a flow rate of 1,700 Standard Cubic Feet per Minute (SCFM) and a temperature of 1695 degrees Fahrenheit.
3. The truck wash was in use due to wet conditions.
4. No mud or blowing litter was observed along Applebutter Road, the entrance driveway, or at the landfill office. The access road used by trucks exiting the working face and headed toward the truck wash and scale was muddy due to wet conditions. Mr. Schleyer stated he would have the roadway swept and cleaned.
5. No litter was observed in the trees within the perimeter fence. Litter was again observed on the face of the MSE wall. Mr. Schleyer stated this was some of the same litter reported previously and that the retrieval pole used to remove litter from the wall had become lodged while the pickers were working. Mr. Schleyer assured me he would have the removal pole dislodged from the wall and all litter removed. Windscreens were in use at the working face. Wind direction during the inspection was predominantly from the west/southwest (blowing from), with an estimated speed of zero to five miles per hour (0-5 mph).
6. Cell 4E, Stages 1 and 2 continue to be the active disposal areas. One (1) truck was off-loading and none were waiting. The truck tipper was parked on site near the working face, but was not in use during the inspection.
7. Some washout and rills were observed in the daily cover material southwest of the active disposal area due to recent weather conditions. These events have caused garbage to become exposed in these areas, and repairs are required. Mr. Schleyer ensured these areas of washout would be repaired.
8. The soil previously reported as having been stockpiled for daily cover material near the north end of Cell 4E has been spread in that area in preparation for construction of the sub-base of the next disposal area, Cell 4E Stage 3. No Alternative Daily Cover material is being used and no excavation work was taking place at the north end of Cell 4E to generate cover material.
9. 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.

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10. Slight garbage odors were observed upon entering the facility as well as intermittently near the northwestern corner of site adjacent to the water tower. This inspector did not observe any landfill gas related odors during the inspection.
11. 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. When prompted, Mr. Schleyer indicated the liquid used in the odor control lines during freezing conditions comes supplemented with an anti-freeze additive. This enables continued use as needed throughout the winter.
12. A new control panel that will supply emergency power to Pump Stations 1, 2, and 3 in the event of a power outage is still staged in the parking lot, awaiting installation.
13. Repairs to several gas wells with reported exceedances of 500 parts per million of methane during Surface Emission Monitoring events in early November were observed from a distance. Mr. Schleyer stated these repairs are completed for now, however gas leaks of this nature are a "moving target", and monitoring and repairs are likely to be ongoing.
14. Mr. Schleyer stated that Quarterly groundwater sampling had taken place December 15, 16, and 17 as scheduled.
15. This inspector conducted a patrol through Steel City and the narrows after leaving the landfill. No landfill-related odors or sounds were observed during this inspection, however a strong, persistent wood-burning odor was observed immediately to the west of the Freemansburg hill climb property.

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.



Jacob A. Schray, HMI

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