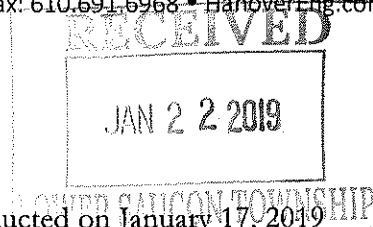


Hanover Engineering

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January 18, 2019



Ms. Leslie Huhn, Township Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015

RE: Inspection Conducted on January 17, 2019
IESI Bethlehem Landfill
Hanover Project LS90-7

Dear Ms. Huhn:

The purpose of this letter is to report the results of the above-referenced "pre-meeting" inspection. The inspection was conducted by me along with Robert McReynolds, Northeast Division Vice President, David Pannucci, Regional Engineer, and Lee Zimmerman, Compliance Manager at the Blue Ridge Landfill. The following items were noted during the inspection:

1. The BRE plant was running at full capacity (both compressors online) at 1,600 scfm.
2. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. For both transfer stations combined, zero (0) out of eight (8) trucks were overweight.
3. The landfill flare was running at a flow rate of 1,420 scfm and a temperature of 1,638 degrees Fahrenheit and appeared to be operating normally. There were no visible emissions from the flare at the time of the inspection. Mr. Pannucci stated that there have been no visible emissions since the incident on November 28, 2018 (see report of December 6, 2018 inspection). The bar graph on the instrument panel indicated that the flare was running at fifty-two percent (52%) of the Variable Frequency Drive (VFD) capacity. The largest blower was in operation. The paper chart was still not operational, as during the prior inspection.
4. The truck wash was closed due to freezing conditions.
5. No mud, blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. It was observed on the approach to the landfill that Applebutter Road was being pretreated by PennDOT with de-icing agent in preparation for the upcoming winter storm events. Mr. Pannucci stated that the street sweeper was scheduled to clean Applebutter Road tomorrow. I advised him to cancel this, since the road was pretreated and there was snow in the overnight forecast. Weather conditions were sunny, clear, 30 degrees, wind from the east/northeast at 10 - 20 mph.
7. Garbage was being disposed of at one (1) working face in the northwest corner of Cell SE-1A. From here garbage is being pushed southward and eastward. The working face is being kept small to keep it manageable (easy to cover). The approach to the working face was stable. The first eight foot (8") "fluff lift" has been installed in the cell area being utilized for disposal. Therefore, disposal today is taking place above the fluff lift, no spotters are

ROUTING

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- required at the working face, and all types of permitted waste are allowed for disposal (not just Municipal Solid Waste). One (1) truck was unloading on the tipper and three (3) were unloading conventionally (dump body). Three (3) trucks were waiting to unload. Two (2) dozers were spreading and placing garbage, and one (1) dozer was spreading daily cover. One (1) compactor was in use. Soil for daily cover was staged at the working face. Mr. Pannucci stated that twenty to thirty (20 – 30) loads of cover soil are being imported every day and stockpiled on site. Trucks are also bringing in brick material that would be used to reinforce the approach road to the working face. Wind screens are not being used near the working face since it sits higher than the bottom side of the cell and wind would just carry litter over them. Instead they are utilizing pickers to remove windblown litter.
8. Mr. Pannucci stated that average acceptance rates have been running about 1,500 tons/day.
 9. The east end slope of the landfill is being dressed up to cover the litter showing on the surface. This work was observed taking place during the inspection.
 10. Two (2) pickers were working on site to remove blown litter south of Cell SE-1A.
 11. The north slope road was driven. No additional erosion since the last inspection was observed. The rock-lined drainage swale and rock check dams in front of the runoff points are still in good shape.
 12. No disposal is taking place at top of the landfill. Mr. Pannucci stated previously that they are at maximum elevation at the top.
 13. Mr. Pannucci stated that seeps on the south face are being remediated as they appear.
 14. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 15. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 16. No odors were observed on the site.
 17. The customer convenience area is in use for small vehicles. Recycling containers are still located along the old south slope access road.
 18. Mr. McReynolds stated that they have just hired a machine operator, which gives them eight (8) total. He stated that they are now fully staffed with machine operators.
 19. Mr. McReynolds stated that they are attempting to fill the position of District Manager internally and are interviewing candidates.
 20. I observed that construction work was continuing to take place on the main gabion down channel on the south face, including replacement of the damaged liner under the channel. The new channel now extends up to the third bench. This work will progress up the south face and encompass the entire length of the channel.
 21. As reported previously, new compressor equipment is being installed by SCS, the landfill's gas consultant. It is housed in what will be called Compressor Shed 2. Air lines from the compressor will be routed to about fifteen (15) gas wells in this area and used to run pumps in those wells that operate pneumatically rather than electrically. The wells are all "watered in" (contain leachate which inhibits the flow of gas from the wells). Pumping the wells will allow for more efficient removal of larger volumes of gas. The compressor equipment installation is complete and awaiting final inspection before activating.
 22. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:57 a.m. No landfill-related odors were observed. The sight and sound of trucks and equipment (dozers, compactor) working on the landfill was observed. The sight of the tipper was observed. The culvert under Applebutter Road was observed to be carrying the streamflow with no backups. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:26 a.m. No landfill-related odors were

observed. The sight and sound of trucks on the landfill (south face haul road) were observed from the end of Skyline Drive. I conducted a driving patrol through Steel City after the inspection, starting at 11:38 a.m. No landfill-related odors were observed. From the entrance to the Hill Climb the sight and sound of trucks on the landfill road on top of the MSE wall was observed. This is the route taken by trucks after leaving the working face and returning to the scale. On the driving patrol through the Narrows it was observed that the road downslope of the runoff point from the landfill was clean. No water was running at the time of the inspection (dry weather conditions).

Activity Related to the Southeast Realignment Expansion

23. No work was taking place in future Cell SE-1B.

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



Christopher A. Taylor, PG, HMI
Host Municipality Inspector

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