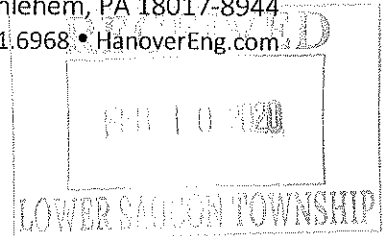


# Hanover Engineering

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February 7, 2020

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

RE: Inspection Conducted on February 6, 2020  
IESI Bethlehem Landfill  
Hanover Project LS90-7

Dear Ms. Huhn:

The purpose of this letter is to report the results of the above-referenced "mid-meeting" inspection. The inspection was conducted by me along with David Pannucci, Regional Engineer, Astor Lawson, District Manager, and Cody White, Landfill Gas Technician. The following items were noted during the inspection:

1. The BRE plant continues to be off-line, with no activity observed.
  2. The landfill flare was running at a flow rate of 2,850 standard cubic feet per minute (scfm), a temperature of 1,665 degrees Fahrenheit, and fifty-two inches (52") of vacuum. The flow rate was reading as one hundred percent (100%) of the variable frequency drive. Cody White, Landfill Gas Technician, explained that this reading indicates that the VFD is running at the maximum speed for which it is set. He stated that it does not indicate that the flare capacity is being maxed out. The largest blower was in operation. The flare appeared to be running normally with no visible emissions or flames observed during this inspection. Mr. White stated that there have been no visible emissions from the flare since the last inspection. The paper chart went back to January 30, 2020 and showed steady gas flow since then. Mr. White stated that there was a shutdown on January 27, 2020 when central power to the facility was lost due to a malfunction at a nearby electrical substation. Mr. White stated that he plans to have a company come in to perform a "vibration check" on the blower to make sure it is running properly. He also plans to have a consultant come in to check the variable frequency drive.
- The truck wash was open and observed in use. Mr. Lawson stated that they are now adding an odor neutralizer to the wash water. The resulting foam was observed at the exit to the truck wash.
- No blowing litter, mud, or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. There was some sediment on the westbound lane of Applebutter Road, which had just been cleaned by a street sweeper. The street sweeper was observed cleaning the eastbound lane upon my arrival at the site.
- Weather conditions were heavy overcast, light drizzle, temperature in the 30s, and wind calm.
- A street sweeper was observed cleaning internal roads later in the inspection.

**ROUTING**

- Council 3.
- Manager *my*
- Asst. Mgr.
- Zoning 4.
- Finance
- Police
- P. Works
- P/C
- P & R 5.
- EAC
- Engineer 6.
- Solicitor
- Planner
- Landfill
- EMC
- Other

web: hca 02-06-20

7. The customer convenience area was in use for small vehicles.
8. Two (2) pickers were observed working on site.
9. Garbage was being disposed of at one (1) working face at the western end and southern side of Cell SE-1B. The approach to and departure from the working face was very muddy but passable. Piles of brick were staged at the entrance to the working face for use as road-bed material as needed. Zero (0) trucks were unloading on the tipper, with zero (0) waiting for the tipper. One (1) truck was unloading conventionally, with zero (0) trucks waiting. One (1) dozer and one (1) compactor were working in the garbage. A dump truck was observed returning from dumping soil near the working face to use as daily cover. The tall berm that had been formed along a portion of the south side of the cell to block garbage from being blown off the working face was still in place and had been extended to tie into the landfill's eastern face. Wind screens were in place on top of this berm. No litter was blowing due to calm conditions. It was observed that soil cover had been spread near the east end of the working face to cover flagging garbage. More areas of flagging garbage were observed. Mr. Lawson stated that the cover operation would continue until all areas of flagging garbage were covered.
10. The area of the south face has yet to be dressed with additional cover soil. This is awaiting suitable site conditions.
11. The north slope road was driven. The riprap swale and rock check dams were in good shape with no erosion observed. Minor erosion was observed in the roadbed.
12. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
13. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
14. On January 25, 2020 a passing motorist photo documented stormwater running off the landfill onto Applebutter Road. During this inspection Mr. Lawson explained that grading in areas of gas line replacement near the flare had contributed to this problem. It caused water to bypass the stormwater sump in this area and run down the paved road, where much of it also bypassed an inlet. From here it ran down a bank and onto Applebutter Road. Mr. Lawson pointed out work that had been done in this area, including installing silt fence along the perimeter fence, grading to divert water to flow parallel to the site boundary instead of off-site, and installation of riprap on the bank to stabilize it. He stated that the grading near the flare would be corrected next to direct water to the sump, so it enters the stormwater collection system.
15. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. Zero (0) out of eight (8) trucks were overweight.
16. No gas odors were observed anywhere on site during the inspection.
17. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:00 a.m. No landfill-related odors were observed. The sight and sound of garbage trucks were 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 11:15 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 11:26 a.m. No landfill-related odors were observed. The sound of trucks on the landfill was observed from the entrance to the Hillclimb. On the driving patrol through the Narrows it was observed that the road immediately downslope of the runoff point from the landfill was clean. No landfill-related issues were observed.

Ms. Leslie Huhn  
Township Manager

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February 7, 2020

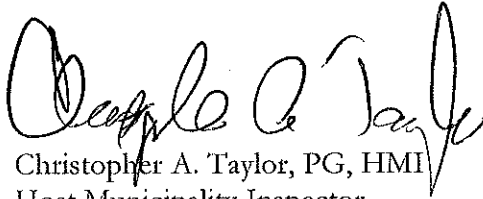
Activity Related to the Southeast Realignment Expansion

18. No expansion construction work is taking place at this time.

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

cat:llb

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