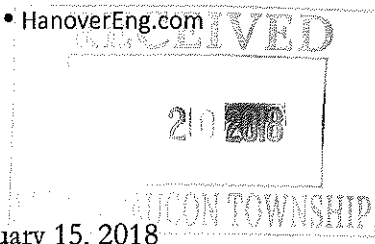


Hanover Engineering

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February 16, 2018

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

RE: Inspection Conducted on February 15, 2018
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 Nick Rogers, Environmental Compliance Manager, and Mr. Dave Pannucci, Regional Engineer, who just recently transferred and will now be based at this facility. The following items were noted during the inspection:

1. The BRE plant was running. Mr. Rogers stated that they were running at half capacity.
2. The landfill flare was running at a flow rate of 1,680 scfm and a temperature of 1,664 degrees Fahrenheit, and appeared to be operating normally. The bar graph on the instrument panel indicating percent of VFD was not available to read because a technician was downloading data from the instrument panel. The largest blower was in operation. The record of gas flow to the flare recorded on the paper chart went back to February 2, 2018. The chart showed an increase in gas flow on February 10, 2018. Mr. Rogers stated that this was when BRE went from two (2) compressors online to one (1). The chart showed an increase in gas flow on February 12, 2018. Mr. Rogers stated that this was when BRE went offline completely. Finally, the chart showed a decrease in gas flow on February 13, 2018. Mr. Rogers stated that this was when BRE put one (1) compressor back online, and that they have been running at half capacity since.

Mr. Rogers explained that the technician was setting up a Supervisory Control and Data Acquisition (SCADA) system for the landfill flare that will allow landfill personnel to monitor and control the flare function remotely from any connected device and to receive text alerts of outages. The system will also provide for the automatic change of gas flow to the flare when changes in the collection system occur (such as a change in gas flow to the BRE plant). Mr. Rogers stated that the BRE plant will also have a SCADA system installed so that both the flare and the plant can be monitored and controlled in unison.

3. The truck wash was not in use, and has been out of commission since December 28, 2017 when the pump was pulled for maintenance. Mr. Rogers stated that a new pump was being installed today, and that the truck wash would be operational by the end of the day. The work on the truck wash was observed during the inspection, with a crane present to install the new pump. As Mr. Rogers stated previously, to compensate for the loss of the truck wash, the landfill has been hosing trucks off using the water truck and has increased the use

- S
ROUTING
- Council
 - Manager *only*
 - Asst. Mgr.
 - Zoning
 - Finance
 - Police
 - P. Works
 - P/C
 - P & R
 - EAC
 - Engineer
 - Solicitor
 - Landfill
 - EMC
 - Other *Web*

- of the street sweeper to clean internal roads and Applebutter Road. During this first part of the inspection, it was observed that the street sweeper was cleaning one of the paved internal roads. Later in the inspection, it was observed that that the sweeper was cleaning Applebutter Road.
4. No blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. No litter was observed at the top of the south slope, where it had been noted during the previous inspection. A large amount of sediment was observed on Applebutter Road starting at the landfill entrance and going west.
 5. Wind during the inspection was from the west at five to ten (5 - 10). The weather was clear and mild.
 6. Garbage was being disposed of at the top of the landfill in Cell 4B/4D. One (1) compactor was running at the working face to spread and compact garbage. One (1) dozer was running near the working face to place soil cover. The truck tipper is still staged at the working face, and it was being used to unload a truck during the inspection. One (1) truck was unloading conventionally and zero (0) were waiting to unload. Trucks are still approaching and departing the working face utilizing the south face haul road. Garbage odors were observed at the working face. No odors were observed anywhere else on site.
 7. It was observed during the last inspection that the daily soil cover in some areas of recent disposal at the top of the landfill was inadequate, and that pieces of garbage were showing through the cover. I advised Mr. Rogers that this was unacceptable and needed to be corrected. The work to correct this issue was taking place during the last inspection. I observed during this inspection that this work was continuing, and that a substantial portion of the area in question had adequate daily cover placed. I reviewed with Mr. Rogers the areas that still had inadequate cover.
 8. Cover soil is still being imported. No Alternative Daily Cover material is being used.
 9. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 10. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 11. The recycling and customer drop-off area (for small, non-commercial vehicles with garbage) is still relocated to the southern access road. The new area for these services is now being constructed as part of the Southeast Realignment. However, work on this area is temporarily suspended due to weather and site conditions.
 12. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:24 a.m. No landfill-related odors were observed. The sight and sound of garbage trucks on the landfill were observed. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:45 a.m. No landfill-related odors were observed. The sight and sound of garbage trucks on the landfill were observed. I conducted a driving patrol through Steel City after the inspection, starting at 11:59 a.m. No landfill-related odors or sounds were observed. No landfill-related issues were observed on the driving patrol through the Narrows.

Activity Related to the Southeast Realignment Expansion

13. Mr. Rogers stated that all construction activity related to the expansion has been suspended pending suitable weather and site conditions. The status of construction to date is as follows:
 - The first twenty-eight (28) courses of the MSE wall have been completed. The top two (2) courses are still incomplete.

Ms. Leslie Huhn
Township Manager

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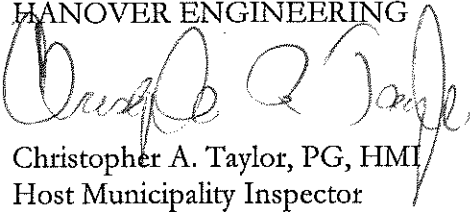
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- New Leachate Management Chamber (LMC) 1R has been constructed and tied in. It replaces LMC 1, which will be removed as part of the expansion. New Valve Vault (VV) 1 has been constructed and is receiving flow from both LMC 1R and from Abatement Wells 1 and 2. LMC 1 used to flow by gravity to LMC 2. However now, LMC 1R pumps up to VV 1, which then flows by gravity to LMC 2. LMC 1R contains one (1) pump to handle both Collection Zone and Detection Zone flows.
- Stormwater manholes and pipes just west of the MSE wall have been constructed.

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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