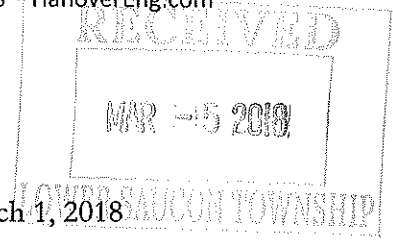


HanoverEngineering

252 Brodhead Road • Suite 100 • Bethlehem, PA 18017-8944
Phone: 610.691.5644 • Fax: 610.691.6968 • HanoverEng.com

March 1, 2018



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

RE: Inspection Conducted on March 1, 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 "Mid-meeting" inspection. The inspection was conducted by me along with Don Hallock, District General Manager. Mr. Hallock stated that Nick Rogers, Environmental Compliance Manager, was working at the Blue Ridge Landfill today. The following items were noted during the inspection:

1. The BRE plant was running. Mr. Hallock stated that they were running on one (1) compressor.
2. The landfill flare was running at a flow rate of 1,800 scfm and a temperature of 1,631 degrees Fahrenheit, and appeared to be operating normally. The bar graph on the instrument panel indicated the flare was running at fifty-five percent (55%) of the Variable Frequency Drive (VFD). The largest blower was in operation. The record of gas flow to the flare recorded on the paper chart went back to February 19, 2018. The chart showed an increase in gas flow on February 26, 2018, and a corresponding decrease on February 28, 2018. Mr. Hallock stated that this was when BRE went off line for scheduled maintenance and came back online with one (1) compressor.
3. The truck wash was in use, in spite of relatively dry conditions. Mr. Hallock stated that he was sending all vehicles through the wash as a precaution to ensure that no material is tracked out onto the road. Mr. Hallock stated that the new pump that was installed in the truck wash was generating more consistent water pressure than the old pump did. In order to demonstrate, he drove the inspection vehicle through the truck wash at the end of the inspection. He stated that the street sweeper is still scheduled every Friday to clean internal roads and Applebutter Road, and that they brought it in yesterday for an extra cleaning. A water truck was also observed spraying the internal roads. Mr. Hallock stated that this was for dust suppression. I asked how material got tracked out onto Applebutter Road last week if the truck wash was working. Mr. Hallock stated that a "rock truck" may have skipped going through the truck wash on the way out. He stated that he is working to ensure that all vehicles use the truck wash when it is open by use of signage and landfill personnel directing drivers to use it.
4. No mud, blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. Litter was observed at the top of the

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

- south slope. A picker was observed working to remove it. Another picker was working to remove litter on the north face.
5. Wind during the inspection was from the east at zero to five (0 - 5). The weather was clear and mild.
 6. Garbage was being disposed of at the top of the landfill in Cell 4A, which is further east than the disposal area observed during the last inspection. Mr. Hallock stated that the working lift was at elevation 690. One (1) compactor was running at the working face to spread and compact garbage. The truck tipper was being used to unload trucks during the inspection. One (1) truck was unloading conventionally and zero (0) were waiting to unload. Mr. Hallock stated that they would be disposing of garbage in this area for some weeks. They are stripping cover soil in this area to prepare for placement of garbage. He stated that this area was part of the expansion approval. He stated that the former working face area over Cells 4B/4D has been brought up to approximately elevation 715, but that disposal here will stop for the time-being. 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 a prior 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 has been taking place since. I observed soil stockpiles and a dozer placing extra cover during the inspection to continue to dress up deficient areas.
 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. Mr. Hallock stated that planning work for new gas extraction wells is taking place.
 13. I advised Mr. Hallock that strong winds and heavy rains were predicted for tomorrow and advised him to make ready for the storm. He stated that he was already doing so.
 14. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:25 a.m. No landfill-related odors were observed. The sight and sound of a bulldozer working on the top of the landfill was observed. No truck traffic on the landfill was observed at this time. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:33 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 11:48 a.m. No landfill-related odors were observed. The sounds of a truck driving and a "tailgate slap" were observed. No landfill-related issues were observed on the driving patrol through the Narrows.

Activity Related to the Southeast Realignment Expansion

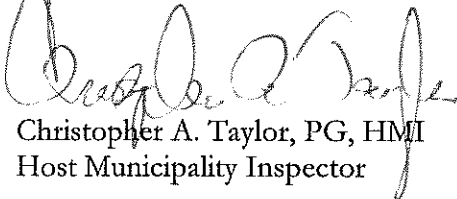
15. Mr. Hallock stated that all construction activity related to the expansion has been suspended pending suitable weather and site conditions, except for the installation of the leachate force main in this area, which was taking place today. The status of construction to date is as follows:

- The first twenty-eight (28) courses of the MSE wall have been completed. The top two (2) courses are still incomplete.
- 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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