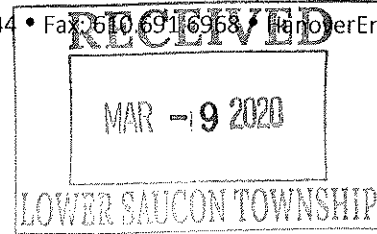


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March 6, 2020

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

RE: Inspection Conducted on March 5, 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 Astor Lawson, District Manager. 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 2,940 standard cubic feet per minute (scfm), a temperature of 1,665 degrees Fahrenheit, and fifty-four inches (54") of vacuum vs a set point of sixty inches (60"). The flow rate was reading as one hundred percent (100%) of the variable frequency drive. Cody White, Landfill Gas Technician, previously 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 and seemed to be running normally and quieter than during the last inspection. The flare appeared to be running normally with no visible emissions or flames observed during this inspection. Mr. Lawson stated that there have been no visible emissions from the flare since the last inspection. The paper chart went back to March 2, 2020 and showed steady gas flow since then. Landfill personnel are still working to figure out why they are not achieving the full set point vacuum on the well field.
3. The truck wash was open and was observed in use.
4. No mud, odors or blowing litter were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway or the office parking lot.
5. Weather conditions were sunny, no precipitation, temperature of 40 degrees, and wind from the north/northwest at five to ten miles per hour (5 – 10 mph). Two (2) pickers were observed working on site to remove blown litter. Garbage was being disposed of at one (1) working face in the middle of Cell SE-1B with two (2) different approaches. Smaller local collection trucks approached over the top of the landfill, drove down the eastern face, and unloaded at the western end of the working face. Larger trucks with walking floors or needing the tipper unloaded at the eastern end of the working face. The approaches to and departures from the working face were stable and passable. Piles of brick were staged at the entrance to the working face for use as road-bed material as needed. One (1) truck was unloading on the tipper, with one (1) waiting for the

ROUTING

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

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weberts

- tipper. One (1) truck was unloading conventionally, with zero (0) trucks waiting. One (1) dozer and one (1) compactor were working in the garbage. One (1) dozer was spreading soil for daily cover. A dump truck was observed returning from dumping soil near the working face to use as daily cover, and soil was observed staged near the working face. Wind screens were in place at the working face. A slight persistent gas odor was observed while at the top of the landfill. With the wind blowing from the north at the time, this would put the source on the north face. It was observed that soil cover had been spread near the east end of the working face to cover flagging garbage. Piles of soil were observed staged on the bench for use in covering additional areas of flagging garbage.
8. Site roads were dusty, and I asked Mr. Lawson to start the water truck spraying for dust suppression.
 9. The north slope road was driven. The rip-rap swale and rock check dams were in good shape with no erosion observed. Minor erosion was observed in the roadbed.
 10. An area of the south face has yet to be dressed with additional cover soil. This is awaiting suitable site conditions.
 11. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 12. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 13. Grading near the flare needed to direct stormwater runoff to the sump has not been undertaken. Rather, a silt sock has been installed upgradient to attempt to force stormwater runoff toward the sump.
 14. Mr. Lawson stated that regrading of the south face haul road to direct stormwater flow toward the benches on the east side of the road has been completed.
 15. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. Zero (0) out of nineteen (19) trucks were overweight.
 16. I advised Mr. Lawson that a complaint had been lodged at the Township Council meeting on Wednesday March 4. A passing motorist observed multiple garbage trucks staged along Shimersville Road. We checked with office personnel, who stated that they did not observe that particular violation of the Traffic Management Plan. However, they stated that they did observe one (1) truck parked along Applebutter Road and another that arrived at the landfill too early. They stated that in both cases the trucks were rejected.
 17. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:55 a.m. No landfill-related odors were observed. The sight and sound of garbage trucks and equipment on the landfill were observed. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:20 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 11:32 a.m. No landfill-related sounds or odors were observed. 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.

Activity Related to the Southeast Realignment Expansion

18. Mr. Lawson stated that work to construct the next cells is now under way. Mr. Pannucci had previously explained that Cells 2A and 2B will be constructed concurrently such that the western half of both will be constructed together and filled together and will be known as

Cells SE-2AB Phase I. This is intended to resolve logistical problems that were encountered in the filling of Cells SE-1A and 1B. Later, the eastern half of both cells will be constructed together and be known as SE-2AB Phase II. Mr. Pannucci stated that each cell will be built exactly as designed and approved under the Southeast Realignment Plan, it's only the sequence of construction that is changing. He stated that this proposal was reviewed and approved by Roger Bellas of PA DEP, who advised them that a minor permit modification would not be needed. During the current inspection earthwork was observed taking place near what would be the southeast corner of Cell SE-2AB Phase I. It was observed that Rob Tyler from Martin and Martin was present overseeing this work.

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:jle

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