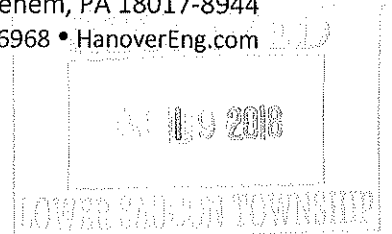


HanoverEngineering

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March 15, 2018



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

RE: Inspection Conducted on March 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 Don Hallock, District General Manager. Mr. Hallock stated that Nick Rogers, Environmental Compliance Manager, was working on a project 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 because they were still waiting for the second compressor to be returned following maintenance.
2. The landfill flare was running at a flow rate of 1,780 scfm and a temperature of 1,646 degrees Fahrenheit, and appeared to be operating normally. The bar graph on the instrument panel indicated the flare was running at fifty-six percent (56%) 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 March 5, 2018, but seemed to end on March 14, 2018. The chart showed generally steady gas flow. BRE has been running on one (1) compressor during this entire timeframe.
3. The truck wash was in use, despite 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. He drove the inspection vehicle through the truck wash at the end of the inspection.
4. No mud, blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. A picker was working to remove litter along the access road leading to the flare.
5. Wind during the inspection was from the west/southwest at ten to twenty (10 - 20) miles per hour. The weather was clear and cold.
6. Garbage was being disposed of toward the eastern end of the top of the landfill in Cell 4D. Mr. Hallock stated that this location is part of the disposal areas approved in the Southeastern Realignment and will be filled to approximately Elevation 712. One (1) compactor was running at the working face to spread and compact garbage. The truck tipper was staged here but was not 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

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

Web

- 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 new garbage over old garbage, but not more than they can fill in a day. No odors were observed at the working face or anywhere else on site. Cover soil was being staged at the working face and daily cover was being placed over new garbage. Trucks are still approaching and departing the working face utilizing the south face haul road.
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. At the time 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. Also, piles of soil with garbage mixed in along the access road to the working face were being loaded and hauled to the working face for disposal. These had been generated when conditions were muddy and mud was being pushed aside to keep the access road passable. Crushed stone has since been placed on the access road to the working face to provide a stable road bed.
 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 the acceptance rate has been about 1,280 tons per day lately.
 13. Mr. Hallock stated that the landfill closed at 1:00 pm on March 2, 2018 because of the powerful winter storm. He stated that they were closed all day on March 7, 2018 due to the snow storm and related truck travel ban on that day.
 14. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:22 a.m. No landfill-related odors were observed. The sound of tailgate “slapping” was observed. No truck traffic or machine operation on the landfill was observed at this time. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:40 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 11:50 a.m. No landfill-related odors were observed. The sounds of “tailgate slapping” were observed at the entrance to the Hill Climb. 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 a stormwater pipe crossing along the access road, 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.

Ms. Leslie Huhn
Township Manager

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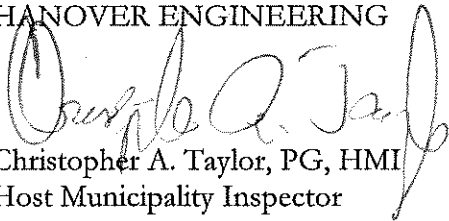
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- New Leachate Management Chamber (LMC) 1R has been constructed and tied in. It replaces LMC 1, which will be removed as part of the expansion. New Valve Vault (VV) 1 has been constructed and is receiving flow from both LMC 1R and from Abatement Wells 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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