

Hanover

Engineering Associates Inc

March 19, 2015



Mr. Jack Cahalan, Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015

RE: Inspection Conducted on March 19, 2015
IESI Bethlehem Landfill
Hanover Project LS90-7

Dear Mr. Cahalan:

The purpose of this letter is to report the results of the above-referenced "pre-meeting" inspection, which was conducted by me along with Allen Schleyer, Compliance Manager for IESI, and Donna Louder, Landfill Committee member. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was running. Mr. Schleyer stated that the plant has been back on line since March 11, 2015.
2. The landfill flare was running at a flow rate of 1,700 Standard Cubic Feet per Minute (SCFM) and a temperature of 1588 degrees Fahrenheit. Mr. Schleyer stated previously that he had turned on the largest blower on February 24, 2015 in response to the outage at the BRE plant in order to create the strongest possible draw of gas to the landfill flare. He stated today that it is his intention to continue to use this larger blower going forward, and only use the smaller blowers as back-ups. This inspector confirmed that the largest blower was in operation today.
3. The truck wash was not in use due to dry conditions.
4. No mud or blowing litter was observed along Applebutter Road, the entrance driveway, or at the landfill office upon my arrival at the facility. A slight landfill gas odor was observed along Applebutter Road west of the landfill, and at the office parking lot.
5. Litter was observed on the southern slope of the landfill and on the face of the MSE wall. A team of pickers was observed removing the litter from the southern slope. Windscreens were in use at the working face. Wind direction during the inspection was predominantly from the west/northwest (blowing from), with an estimated speed of five to ten miles per hour (5-10 mph).
6. Garbage was being disposed of in Cell 4D, near the interface with Cell 4E. One (1) truck was off-loading and one (1) truck was waiting. The truck tipper was not actively being used at the time of the inspection.
7. All cover soil currently being used was previously imported. Mr. Schleyer reported that they have not had to import soil for a long time, due to the large amount already stockpiled onsite. No Alternative Daily Cover material is being used.
8. The west high wall was observed and appears to be substantially unchanged since the last inspection. No major slope failures along the wall were observed.

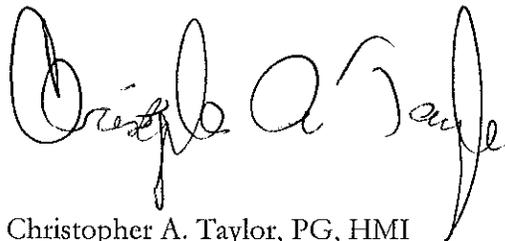
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9. A moderate, fairly persistent odor was observed along the road at the base of the MSE wall from the west end of the wall westward to the water tower. The odor is best described as a mix of garbage and landfill gas. A moderate landfill gas odor was observed along the southern access road.
10. Neither the spray line along the northern perimeter nor the spray line along the southern access road was running at the time of the inspection. Mr. Schleyer has stated that they cannot be operated in below-freezing temperatures.
11. A bulldozer was observed grading soil on the western face. Mr. Schleyer stated that IESI was adding some soil to dress up erosion areas and provide more soil cover.
12. No active work to construct new Cell 4E Stage 3 was taking place. This work was suspended pending better weather and site conditions.
13. The north slope access road was accessible today, but was inaccessible at the beginning of the week due to snow and ice. The quarterly groundwater monitoring is underway and the wells along this road cannot be sampled until access is restored.
14. SCS Consultants was observed onsite performing Operation and Maintenance of gas wells.
15. Mr. Schleyer stated that CBI contractors were onsite preparing for the construction of additional gas wells. He stated that five (5) vertical wells and four (4) horizontal collectors are planned for installation. He stated that rehabilitation work on some existing wells is planned and will be detailed in a letter to be issued soon.
16. This inspector conducted a patrol through Steel City and the narrows, beginning at 12:00 Noon. No landfill-related odors or sounds were observed during this inspection.

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 ASSOCIATES, INC.



Christopher A. Taylor, PG, HMI
Host Municipality Inspector

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