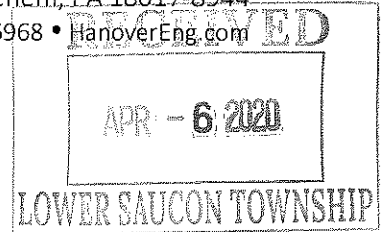


HanoverEngineering

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April 2, 2020

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

RE: Inspection Conducted on April 2, 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. This is the first inspection conducted since March 5, 2020 due to work disruptions caused by the Covid-19 Pandemic. The inspection was started by me alone. Phillip Garcia, Operations Supervisor, joined me with the inspection in progress by caravanning in a separate vehicle and keeping a safe distance during personal interaction per government guidelines due to the Pandemic. 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 2,986 standard cubic feet per minute (scfm), a temperature of 1,635 degrees Fahrenheit, and fifty-five inches (55") 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. The flare appeared to be running normally with no visible emissions or flames observed during this inspection. Mr. Garcia stated that there have been no visible emissions from the flare since the last inspection. He stated that he replaced a thermocouple yesterday and that the flare was down for fifteen (15) minutes for this work. The paper chart was new and showed no record.
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. A street sweeper was observed cleaning Applebutter Road and internal roads.
6. Weather conditions were sunny, no precipitation, temperature in the 40s, and wind from the west/northwest at ten to twenty miles per hour (10 - 20 mph).
7. Two (2) pickers were observed working on site to remove blown litter from the north face.
8. Garbage was being disposed of at one (1) working face on the west end of Cell SE-1B. The approach to and departure from the working face was stable and passable. One (1) truck was unloading on the tipper, with one (1) waiting for the tipper. One (1) truck was unloading conventionally, with zero (0) trucks waiting. One (1) dozer and one (1) compactor were

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- working in the garbage. A dump truck was observed going to dump soil near the working face to use as daily cover, and soil was observed staged near the working face. Soil stockpiles formed a large berm on the south edge of the working face to help contain blowing litter. Wind screens were in place at the working face. A moderate fleeting gas odor was observed while at the top of the landfill. With the wind blowing from the northwest at the time, this would put the source on the north face. It was observed that soil cover had been spread over the east end of the working face to cover flagging garbage.
9. Short litter fences were observed to be installed along benches on the east end and wrapping around to the beginning of the south face.
 10. Site roads were dusty, and I asked Mr. Garcia if the water truck was available for spraying for dust suppression. Mr. Garcia responded that the water truck was in working order, but a worker had called off work and he had no one to operate it.
 11. 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.
 12. An area of the south face has yet to be dressed with additional cover soil. Soil was observed stockpiled at the top of the south face and spreading of this soil over the south face appeared to be in progress in one (1) area.
 13. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 14. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 15. The customer convenience area was open and being used.
 16. We did not enter the scale house to inspect trucking slips since the weigh master did not want to have contact with anyone out of health concerns.
 17. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:50 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 11:27 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 11:38 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. It was observed that work to construct the next cells is continuing. Landfill personnel 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. It was explained 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. According to landfill personnel, 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 it was observed that earthwork had taken place over much of the cell footprint and it appeared that subgrade was

Ms. Leslie Huhn
Township Manager

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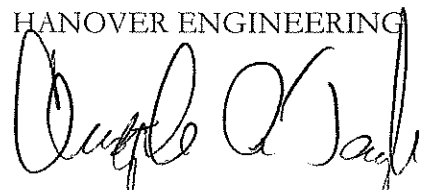
April 2, 2020

established over much of the footprint. Excavation work on the edge of the sedimentation basin was taking place. Mr. Garcia stated that excavated soil is being hauled for use as cover soil. It was observed that dump trucks were hauling stone for cell construction and dumping it at a large stockpile by the north road.

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:djn

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