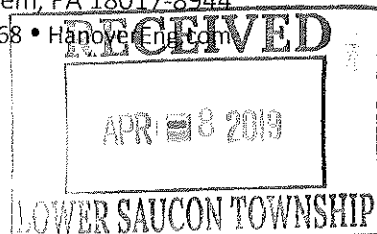




# HanoverEngineering

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April 5, 2019

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

RE: Inspection Conducted on April 4, 2019  
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 David Pannucci, Regional Engineer. The following items were noted during the inspection:

1. The BRE plant was not running. Mr. Pannucci stated that the plant continues to be down since January 31, 2019 due to equipment problems. He is operating under the assumption that the plant will not be repaired, since it has a scheduled permanent shut-down date of June 1, 2019. This permanent shutdown is the result of a business decision by Exelon, the plant's owner.
2. As a result of the BRE situation, Mr. Pannucci stated that Waste Connections has now completed the re-tuning of the entire landfill gas wellfield. This will set all of the wells for draws appropriate to the flare alone, instead of both the flare and the BRE plant.
3. The landfill flare was running at a flow rate of 2,593 scfm (3,100 cfm) and a temperature of 1,670 degrees Fahrenheit and appeared to be operating normally. There were no visible emissions from the flare at the time of the inspection. The bar graph on the instrument panel indicated that the flare was running at seventy-three percent (73%) of the Variable Frequency Drive (VFD) capacity. The largest blower was in operation. Mr. Pannucci stated that the two (2) smaller blowers were ready on stand-by if needed. The paper chart was operational and provided a record back to March 22, 2019 indicating steady gas flow since then. Mr. Cody White joined us at the flare enclosure and stated that gas flow to the flare was reduced because they shut off a twelve-inch (12") header pipe to move it as part of the construction of Cell SE-1B. He stated that it would be reconnected by the end of the day. Mr. Pannucci previously stated during the last inspection that Waste Connections has issued a bid package for the construction of the second flare and is soliciting pricing from vendors. The truck wash was still closed since the last inspection. The malfunction that forced its closure as of the last inspection has been repaired. However, Mr. Pannucci stated that a vacuum truck contractor was completing the cleanout of the reservoir for the truck wash. This work was observed taking place during the inspection. Following completion of this work, the reservoir will be refilled and the truck wash will again be operational.

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ROUTING

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- Asst. Mgt.
- Zoning
- Finance
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- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EMC
- Other

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*webster head 04-04-19*

6. No blowing litter, mud, or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. Upon entering the landfill, the street sweeper was observed exiting the landfill and cleaning the westbound lane of Applebutter Road, heading toward Shimersville Road.
7. Weather conditions were sunny, 45 degrees, and wind from the north at ten to twenty (10 – 20) miles per hour.
8. Garbage was being disposed of at one (1) working face above and west of the northwest corner of Cell SE-1A. From here garbage was being pushed eastward down into the cell. The approach to the working face was dry and passable. One (1) truck was unloading on the tipper and one (1) truck was unloading conventionally (dump body or walking floor). Zero (0) trucks were waiting to unload. Two (2) dozers were spreading and placing garbage. One (1) compactor was in use. Cover soil was being staged at the working face. Wind screens are not being used near the working face, since it sits higher than the bottom side of the cell and wind would just carry litter over them. Mr. Pannucci stated that acceptance rates are currently in the target range of 1,000 to 1,100 tons per day in an effort to throttle back due to limited room for disposal. No odors were observed near the working face, or anywhere else onsite.
9. As addressed in the report of the previous inspections, the area at the bottom of Cell SE-1A remains free of garbage and is marked off with painted pipes and tires. This is the “covenant area”, which the site surveyor marked the limits of.
10. A large amount of windblown litter was observed on the ground and in the trees to the east of the working face. It was observed that two (2) pickers were working on site to remove the litter. I asked Mr. Pannucci to add more pickers to the crew to speed up the removal process, given the amount of litter involved. He stated that he would bring this up to Mr. McReynolds.
11. The north slope road was driven. The road bed, rip-rap swale, and rock check dams were in good shape with erosion.
12. No disposal is taking place on top of the landfill. However, an access road has been constructed here. As Mr. Pannucci stated previously, this has replaced the eastern access road to the working face, which will be removed to make room for the construction of Cell SE-1B and for placement of garbage. As a result of this, trucks departing the working face no longer use the road on top of the MSE wall to exit the facility. However, this road is still used for internal operations.
13. An area near the middle of the south face was being dressed by a dozer.
14. Mr. Pannucci stated that two (2) or three (3) seeps on the south face were repaired this week.
15. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
16. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
17. The customer convenience area is in use for small vehicles.
18. The work to repair the large erosion rills observed on the slope below the south face haul road has not yet begun. I requested that Mr. Pannucci prioritize this work.
19. Construction work on the main gabion down channel on the south face has been postponed. Mr. Pannucci stated that the company which started the work is the same company that will be constructing new Cell SE-1B, and that the gabion down channel work will wait until cell construction is complete.
20. The new compressor equipment installed by SCS, the landfill’s gas consultant, continues to be operational to dewater wells.

21. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. Zero (0) out of three (3) trucks were overweight.
22. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:00 a.m. No landfill-related odors were observed. The sight and sound (engines and travel alarms) of trucks and equipment working on the landfill, including the tipper, was observed. The culvert under Applebutter Road was observed to be carrying the streamflow with no backups. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:25 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 odors were observed. From the entrance to the Hill Climb no trucks were observed on the landfill road on top of the MSE wall, since this is no longer the route taken by trucks which have already unloaded and are heading toward the landfill exit. On the driving patrol through the Narrows it was observed that the road immediately downslope of the runoff point from the landfill was clean. Sediment was observed in the "belly" of the road further east of this.

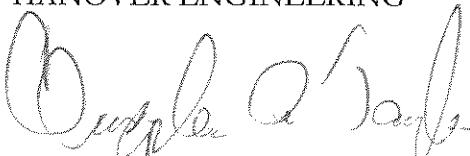
Activity Related to the Southeast Realignment Expansion

23. As reported previously, excavation work has been completed in future Cell SE-1B: they have peeled the remainder of the soil off of the geosynthetic cap, removed the cap, and placed soil to level the subgrade in preparation for construction of this new cell. A gas header pipe was being rerouted to accommodate the cell construction. Next, construction of the subbase will begin with the placement of clay-rich soil, stockpiled on site.

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

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