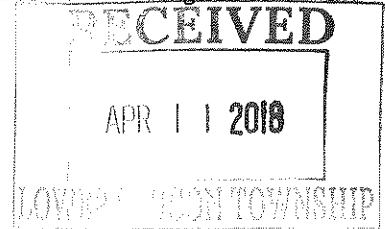


Hanover Engineering

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April 9, 2018

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

RE: Inspection Conducted on April 5, 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 "Mid-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 at a different facility today. The following items were noted during the inspection:

1. The BRE plant was running. Mr. Hallock stated that they were running at full capacity since Monday morning (April 2) when the second compressor was placed back online following a maintenance outage.
2. The landfill flare was not running at the beginning of the inspection. Mr. Hallock stated that the major collector pipe that runs under the new south face haul road had become "watered in" (i.e. - filled with water), due apparently to a sag in the pipe at this location. This blocked off the flow of gas through the pipe. The resulting loss of gas flow left an insufficient volume of gas to run the flare with the BRE plant running at full capacity. He stated that when BRE ramped up to full capacity on April 2, the flare kept shutting down due to insufficient gas flow. They took the flare offline on April 4 until the problem could be fixed. He stated that they were pumping the water out of the pipe right now, and that the facility's engineering technician Rob Tyler was working to restart the flare. I observed Mr. Tyler performing this work while at the flare. The record of gas flow to the flare recorded on the paper chart was observed and found to confirm the conditions described by Mr. Hallock. Later in the inspection, it was observed that the flare was restarted. Mr. Hallock stated that the gas collection line under the haul road would be dug up and replaced to eliminate the sag which caused this problem. He stated that this work must take place when the facility is closed, since the haul road used by the trucks will be dug open. He plans to conduct the work on Saturday April 7.
3. The truck wash was in use due to very muddy conditions.
4. No blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. Mud and small gravel were observed on the westbound lane of Applebutter Road from the landfill entrance going west, and on the outbound lane of the entrance drive. I asked Mr. Hallock about the street sweeping schedule.

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

He stated that the sweeper had cleaned Applebutter Road earlier that morning, then left to go to another job. I asked to have the road swept again, and he contacted the sweeper company and stated that the sweeper would be on his way back shortly to clean Applebutter Road again.

5. A large amount of blown litter was observed on the south face. Mr. Hallock stated that a picker was working to remove litter.
6. Wind during the inspection was from the west/northwest at ten to twenty (10 - 20) miles per hour. The weather was sunny and chilly
7. Garbage was being disposed of toward the eastern end of the top of the landfill in Cell 4B in an area previously approved as part of the expansion. One (1) compactor was running at the working face to spread and compact garbage. The truck tipper was being used to unload one (1) truck during the inspection, with one (1) waiting to use the tipper. One (1) truck was unloading conventionally and three (3) were waiting to unload. Mr. Hallock stated that truck drivers are being asked to dump with their tarps on, to minimize blowing litter. No odors were observed at the working face or anywhere else on site. The approach road to the working face is very muddy, but passable. Trucks are still accessing and departing the working face utilizing the south face haul road.
8. 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 that all disposal areas now appear to have been adequately covered. Piles of soil with garbage mixed in along the access road to the working face are still 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.
9. Cover soil is still being imported. No Alternative Daily Cover material is being used.
10. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
11. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
12. 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.
13. Mr. Hallock stated that the landfill ramped down use of the truck tipper yesterday when the wind storm moved in.
14. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:24 a.m. No landfill-related odors were observed. The sight and sound of truck traffic on the landfill was observed at this time. The use of the truck tipper on the top of the landfill was also observed. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:34 a.m. No landfill-related odors were observed. The sight and sound of garbage trucks on the landfill (south face haul road) were observed. I conducted a driving patrol through Steel City after the inspection, starting at 11:49 a.m. No landfill-related odors or sound were observed. No landfill-related issues were observed on the driving patrol through the Narrows.

Activity Related to the Southeast Realignment Expansion

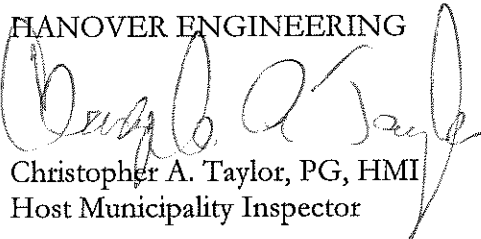
15. Mr. Hallock stated that all construction activity related to the expansion is still suspended pending suitable weather and site conditions. He stated that the construction company, Kinsley, has mobilized back to the site and is gearing up to restart in anticipation of suitable conditions. The status 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.
- 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

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