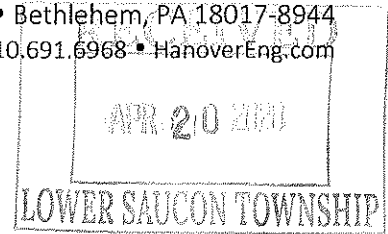


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April 16, 2020

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

RE: Inspection Conducted on April 16, 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 “pre-meeting” inspection. The regularly scheduled live monthly committee meeting was cancelled due to work disruptions caused by the Covid-19 Pandemic. A virtual meeting was readied as a backup but was deemed unnecessary. The inspection was conducted by me and Astor Lawson, District Manager by caravanning in separate vehicles 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 2,950 standard cubic feet per minute (scfm), a temperature of 1,623 degrees Fahrenheit, and fifty-five inches (55”) of vacuum vs a set point of sixty-five inches (65”). 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. The paper chart was a few days old and showed steady gas flow during that time.
3. The most recent odor complaint log was issued the morning before the inspection and was discussed with Mr. Lawson. He stated that he was not aware of any unusual operational conditions on any of the days where odor complaints were lodged. He stated that odor incidents can be attributed to weather conditions, especially barometric pressure and wind direction.
Mr. Lawson stated that SCS conducted their quarterly Surface Emissions Monitoring (SEM) around March 24. They recorded exceedances (he is not aware of how many), and just conducted their ten (10) day rechecks, all of which passed. The report of their inspection has not yet been received.
5. It appears that stormwater runoff near the flare is now being directed to the sump and captured by the collection system rather than running down the access road. Such runoff had previously caused a washout onto Applebutter Road.
6. The truck wash was open and reported by Mr. Lawson to be operational.

S

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7. No mud, odors or blowing litter were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway or the office parking lot.
8. Weather conditions were sunny, no precipitation, temperature in the low 40s, and wind from the west/northwest at ten to twenty miles per hour (10 – 20 mph) with higher gusts.
9. Two (2) pickers were observed working on site to remove blown litter from the north face. Mr. Lawson stated that four (4) pickers total were working on site.
10. 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. Zero (0) trucks were unloading on the tipper, with zero (0) waiting for the tipper. Two (2) trucks were unloading conventionally, with zero (0) trucks waiting to unload conventionally. One (1) compactor was working in the garbage. One (1) dozer was spreading soil to dress cover on the south face near the working face. A large stockpile of soil was observed staged near the working face to use as daily cover. Wind screens were in place at the working face. A slight 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. Mr. Lawson stated that he would have Cody White, Landfill Gas Technician, search for sources of methane emissions in this area. It was observed that soil cover had been spread over the east end of the working face to cover flagging garbage.
11. Short litter fences were observed to be installed along benches on the east end and wrapping around to the beginning of the south face. Mr. Lawson stated that installation of this fence will continue in other areas and be performed by the laborers in conjunction with their work to remove blowing litter. He stated that he told them that they should install this fencing in areas where blowing litter is observed to be an issue.
12. Site roads were dusty, and I asked Mr. Lawson if the water truck was available for spraying for dust suppression. He responded that the water truck was in working order and that he would have Phillip Garcia, Operations Supervisor, run the truck around when he returned to the site. Later during the inspection, Mr. Garcia was back on site and Mr. Lawson spoke to him and directed him to begin spraying the roads for dust suppression.
13. 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.
14. 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. Mr. Lawson stated that dressing cover in this area is being hampered by wet weather and availability of machine operators due to reduced staff during the Pandemic.
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 was open and being used.
18. 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 due to the Pandemic.
19. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:45 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 11:15 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 11:26 a.m. No landfill-related sounds or

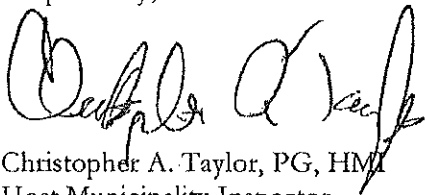
odors were observed. On the driving patrol through the Narrows it was observed that the road immediately downslope of the runoff point from the landfill was clean. No landfill-related issues were observed.

Activity Related to the Southeast Realignment Expansion

20. 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 has taken place over much of the cell footprint and it appeared that subgrade was established over much of the footprint. No work was taking place over most of the cell footprint. Filling and grading work at the bottom of the cell, on the edge of the sedimentation basin, was taking place. Mr. Lawson stated that this grading is in preparation for construction of the next phase of the Mechanically Stabilized Earth (MSE) wall. He stated that the wall crew is scheduled to begin work on May 4, weather dependent.

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,



Christopher A. Taylor, PG, HMI
Host Municipality Inspector

cat:djn

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