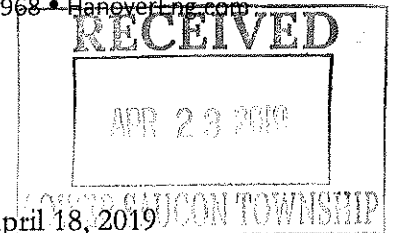


Hanover Engineering

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April 18, 2019

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

RE: Inspection Conducted on April 18, 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 "pre-meeting" inspection. The inspection was conducted by me along with David Pannucci, Regional Engineer, and Astor Lawson, the newly-hired District Manager. 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. The landfill flare was running at a flow rate of 2,978 scfm (3,540 cfm) and a temperature of 1,654 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-nine percent (79%) 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 April 10, 2019 indicating steady gas flow since then.
 3. Mr. Pannucci stated that Waste Connections is still soliciting pricing from vendors for the second flare.
 4. Mr. Pannucci stated that the truck wash has been cleaned out and has been functioning. However, it was not working today for an unknown reason. Mr. Pannucci stated that it might be a tripped breaker, and that he would check on that. I asked him to have it up and running before the rain predicted for tomorrow.
- Mr. Pannucci stated that the water truck was still down for repairs but was being worked on today.
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 arriving at the landfill, the street sweeper was observed exiting the landfill and cleaning the westbound lane of Applebutter Road, heading toward Shimersville Road. It was also observed that the street sweeper had

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

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- already made a round trip and cleaned the eastbound lane near the driveway as well. Later during the inspection, the sweeper was observed cleaning the internal roads.
7. Weather conditions were cloudy, 50 degrees, and wind from the south/southeast 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. Filling of the eastern end of the cell has been completed and cover in this area is being dressed up. The approach to the working face was dry and passable. Zero (0) trucks were unloading on the tipper and one (1) truck was unloading conventionally (dump body or walking floor). Three (3) dozers were spreading and placing garbage. One (1) compactor was in use. Cover soil was being staged at the working face. Wind screens are being used near the working face. No odors were observed near the working face, or anywhere else onsite.
 9. Mr. Pannucci stated that there is available airspace on the east end of the south face, and that they will begin filling this area early next week, weather dependent.
 10. 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.
 11. A large amount of windblown litter was observed in the trees to the east of the working face. It was observed that two (2) pickers were working on site to remove the small amount of litter on the ground.
 12. The north slope road was driven. The road bed, rip-rap swale, and rock check dams were in good shape with little or no erosion observed.
 13. A large area near the west end of the south face was being dressed by a dozer with soil being added.
 14. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 15. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 16. The customer convenience area is in use for small vehicles.
 17. The work to repair the large erosion rills observed on the slope below the south face haul road has been substantially completed. A stormwater swale and berm have been constructed along the upslope side of the haul road to capture water and prevent it from running across the road and eroding the downslope side.
 18. 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.
 19. The new compressor equipment installed by SCS, the landfill’s gas consultant, has dewatered the eleven (11) wells in the area. Mr. Pannucci stated that gas production from those wells did not increase significantly.
 20. Mr. Pannucci stated that PA DEP performed an inspection this week involving a review of stormwater facility reporting paperwork and a visual inspection of stormwater basins and outfall structures. Mr. Pannucci stated that the inspector gave him a verbal okay, with a written report to follow.
 21. We entered the scale house to inspect trucking slips from Waste Connections’ transfer stations. One (1) out of five (5) trucks was overweight, by 80 pounds. This includes the weight of the driver, which the regulations state should be excluded from the vehicle weight when assessing whether a vehicle is 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 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 11:27 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 11:39 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. However, the sound of machinery or trucks on the landfill was audible from here. On the driving patrol through the Narrows it was observed that the road immediately downslope of the runoff point from the landfill was clean.

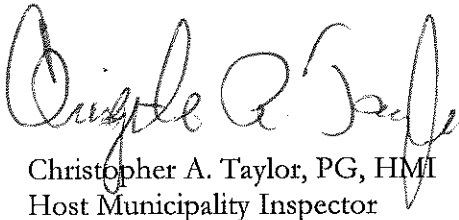
Activity Related to the Southeast Realignment Expansion

23. Construction in future Cell SE-1B is on hold pending suitable weather and site conditions. As reported previously, excavation work has been completed here: 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

cat:djn