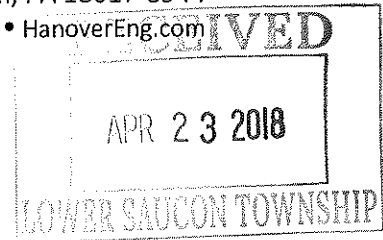


Hanover Engineering

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April 20, 2018

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

RE: Inspection Conducted on April 19, 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 "Pre-meeting" inspection. The inspection was conducted by me along with Don Hallock, District General Manager. The following items were noted during the inspection:

- The BRE plant was not running. Mr. Hallock stated that they were down since Monday, April 16, for scheduled Spring maintenance.
- The landfill flare was running at a flow rate of 2,670 scfm and a temperature of 1,635 degrees Fahrenheit, and appeared to be operating normally. The bar graph on the instrument panel indicated that the flare was running at seventy-four percent (74%) of the Variable Frequency Drive (VFD) capacity. The largest blower was in operation. The record of gas flow to the flare recorded on the paper chart went back to April 12, 2018. The chart showed a step up in gas flow to the flare on April 16, corresponding with the shut-down of the BRE plant. As discussed in the report of the last 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 liquid), due apparently to a sag in the pipe at this location. This blocked off the flow of gas through the pipe. A pump was installed to remove the liquid when the problem was discovered two (2) weeks ago. Mr. Hallock stated that two (2) pumps have burned out since the pump-out work began, but they have been replaced and they continue to pump water from the pipe to maintain the flow of gas through it. He had originally planned to replace the pipe on Saturday, April 7 (the work must be conducted when the facility is closed, since it involves excavating the haul road to the working face). He stated that this work is now tentatively scheduled for the week of April 23.
- Mr. Hallock stated that the contract for the installation of new vertical gas wells has been finalized and that contractor, AEG Environmental, will mobilize to the site next week. He stated that their first task will be to replace the collector pipe under the haul road. Following that, they will be installing four (4) new vertical gas wells and ten (10) "re-drilled" vertical gas wells. The re-drilled wells are constructed next to, or in the area of, older wells that are no longer productive and are meant to replace those older wells.
- The truck wash was in use due to very muddy conditions.

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ROUTING
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 Asst. Mgr.
 Zoning
 Finance
 Police
 P. Works
 P/C
 P & R
 EAC
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 Solicitor
 Planner
 Landfill
 EMC
 Other
 Web

5. No blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. Some sediment was observed on the westbound lane of Applebutter Road from the landfill entrance going west. I observed the street sweeper cleaning the eastbound lane near the landfill entrance as I approached, and then enter the landfill and begin cleaning the internal landfill roads.
6. Wind-blown litter was observed on the south face. Two (2) pickers were observed working to remove the litter.
7. Wind during the inspection was from the north at five to ten (5 - 10) miles per hour. The weather was cloudy and chilly with intermittent rain.
8. Garbage was being disposed of toward the eastern end of the top of the landfill in Cell 3D in an area previously approved as part of the expansion. One (1) compactor and two (2) bulldozers were 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 seven (7) trucks waiting to use the tipper. One (1) truck was unloading conventionally and three (3) were waiting to unload conventionally. A garbage odor was observed at the working face. No odors were observed anywhere else on site. The approach road to the working face is very muddy and barely passable. Trucks were having to be towed away from the working face with a bulldozer. Trucks are still accessing and departing the working face utilizing the south face haul road.
9. 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. However, piles of soil with garbage mixed in along the access road to the working face still remain. These continue to be generated due to muddy conditions when mud is pushed aside to keep the access road passable.
10. Cover soil is still being imported. No Alternative Daily Cover material is being used.
11. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
12. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
13. 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. Work on this area recently resumed.
14. A technician from SCS was observed onsite tuning the gas wells.
15. Mr. Hallock stated that the Pennsylvania Department of Environmental Protection (PA DEP) conducted an inspection yesterday (April 18), which was handled by Nick Rogers, Compliance Manager. After the inspection, he had me speak with Mr. Rogers, who stated that PA DEP had raised concerns with three (3) issues: Surface Emission Monitoring, which revealed nineteen (19) exceedances out of forty-four (44) locations checked, with the highest being over 10,000 parts per million of methane; flagging trash showing in areas of daily cover; and multiple leachate seeps. Mr. Rogers stated that it was a joint inspection between the Waste Management Program and the Air Quality Program, and functioned as the Air Quality Program's quarterly inspection.
16. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road after the inspection, starting at 12:10 p.m. No landfill-related odors were observed. The 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 11:35 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 11:50 a.m. No landfill-related odors were observed. The sound of trucks on the landfill was observed. No landfill-related issues were observed on the driving patrol through the Narrows.

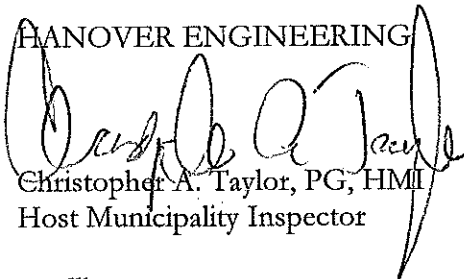
Activity Related to the Southeast Realignment Expansion

17. Mr. Hallock stated that nearly all construction activity related to the expansion is still suspended pending suitable weather and site conditions, except for the work on the customer convenience area. He stated that the construction company, Kinsley, is running just a two (2) man crew to perform small tasks, such as working on the customer convenience area. 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

cat: llb