

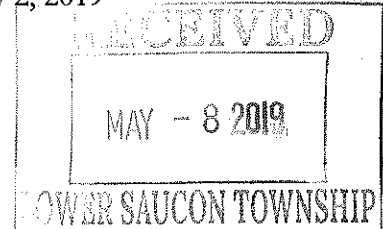
HanoverEngineering

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May 6, 2019

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

RE: Inspection Conducted on May 2, 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, and Astor Lawson, the newly-hired District Manager. The following items were noted during the inspection:

1. The BRE plant was not running. The plant continues to be down since January 31, 2019 due to equipment problems. It appears the plant will not be repaired since it is scheduled to be permanently shut-down on 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 3,012 scfm (3,595 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 the flare was running at seventy-nine percent (79%) of the Variable Frequency Drive (VFD) capacity. The largest blower was in operation. Mr. Pannucci confirmed that the two (2) smaller blowers were ready on standby if needed. The paper chart was operational and provided a record back to April 24, 2019 indicating steady gas flow since then.
3. Mr. Pannucci stated that Waste Connections has selected a bidder for the construction of a second flare but has put the project on hold until its installation becomes necessary.
4. The truck/tire wash was not in use during the inspection due to dry conditions. Mr. Pannucci did confirm it is fully operational at this time.
5. Two (2) water trucks were observed on standby.
6. No blowing litter, mud, or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. Mr. Pannucci stated that the street sweeper had made its rounds earlier in the day.
7. Weather conditions were cloudy with partial sun, 60 degrees, and calm with a slight breeze from the south/southwest.
8. Garbage was being disposed of at one (1) working face near the top of Phase III, Cell 3-B. From here garbage was being pushed southward down into the previously final capped area. During permitting of the Southeastern Realignment, several areas, including this area, had been found to have been underfilled and were designated "re-fill to currently permitted grades" in the permit submission. The approach to the working face was dry and passable,

ROUTING

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

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- however since there is no room for turn around near the working face, trucks are required to back up a considerable distance to unload. One (1) truck was unloading on the tipper, one (1) was unloading conventionally (dump body or walking floor), and one (1) truck was waiting. One (1) dozer was pushing garbage down the southern slope and one (1) compactor was in use. Tarp material is being used to supplement daily cover soil, which is staged on site. Wind screens are in place near the working face. A slight garbage odor was observed near the working face, otherwise no odors were observed anywhere onsite.
9. Material to be used for road subbase is stockpiled near the top of the landfill.
 10. Soil removed from the areas of final capping mentioned above is being relocated and used to fill the "covenant area" at the bottom of Cell SE-1A. A liner has been placed over the protective stone and placement of soil in the covenant area began recently.
 11. Windblown litter has been removed from ground level in the area east of the working face; however, litter was still observed in the trees throughout this area. One (1) picker was observed working to the north of the working face, on the northern slope.
 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.
 13. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 14. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 15. The customer convenience area was open for small vehicles.
 16. The repairs completed on the downslope side of the south face haul road are predominately intact, however, one large erosion rill has reopened. Mr. Pannucci stated they continue to combat stormwater runoff issues in this area and will address the large rill shortly.
 17. 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 is constructing new Cell SE-1B, and that the gabion down channel work will resume once cell construction is complete.
 18. The new compressor equipment installed by SCS is fully operational, however Mr. Pannucci reconfirmed that gas production from the wells in that area did not increase significantly.
 19. Mr. Pannucci stated that the Stormwater Corrective Action Plan submitted to PA DEP and dated March 28, 2019 has not yet been implemented.
 20. Mr. Pannucci stated that final documentation has been submitted to PA DEP in support of their application to change the landfill name, and they are awaiting a response.
 21. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. One (1) out of seven (7) trucks was overweight, by 300 pounds.
 22. A driving patrol was conducted along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:55 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 11:17 a.m. No landfill-related odors were observed. The sight and sound of trucks travelling the south face haul road, including dusty conditions along the road, as well as active use of the truck tipper, were observed from the end of Skyline Drive. After leaving Skyline Drive, I conducted a driving patrol through Steel City. No landfill-related odors were observed. I then proceeded to the entrance to the Hill Climb, where no landfill-related sights, sounds or odors were observed between 11:37 and 11:42 a.m. The road through the Narrows was clean and passable, however, a tree was observed to have

uprooted in the main runoff channel downslope of the landfill and has fallen on utility lines near the roadway.

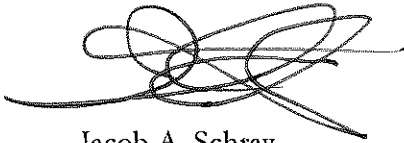
Activity Related to the Southeast Realignment Expansion

23. Construction of future Cell SE-1B has resumed with placement and grading of the subbase nearly 100% complete. Secondary liner has been installed over greater than 50% of the cell area, with crews actively working during the inspection. Protective cover stone has been stockpiled nearby and is ready for placement, upon certification of the secondary liner.

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



Jacob A. Schray
Host Municipality Inspector

Jas/jlg

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