

Hanover

Engineering Associates Inc.

May 8, 2015
LOWER SAUCON TOWNSHIP

Mr. Jack Cahalan, Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015

RE: Inspection Conducted on May 7, 2015
IESI Bethlehem Landfill
Hanover Project LS90-7

Dear Mr. Cahalan:

The purpose of this letter is to report the results of the above-referenced "mid-meeting" inspection, which was conducted by me along with Allen Schleyer, Compliance Manager for IESI, Priscilla deLeon, Council Liaison, Donna Louder, Citizen Representative, and Lee Zimmerman, Acting District Manager for IESI. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was running.
2. The landfill flare was running at a flow rate of 1,541 Standard Cubic Feet per Minute (SCFM) and a temperature of 1658 degrees Fahrenheit. Mr. Schleyer stated previously that he turned on the largest blower on February 24, 2015 in response to the prior outage at the BRE plant in order to create the strongest possible draw of gas to the landfill flare. This inspector confirmed that the largest blower was in operation today.
3. The truck wash was not in use due to dry conditions.
4. No mud, blowing litter, or odor was observed along Applebutter Road, the entrance driveway, or at the landfill office upon my arrival at the facility. A slight gas odor was observed intermittently at the LSA water tower. A slight gas odor was observed at the office parking lot at the end of the inspection. No other odors were observed.
5. A few pieces of litter were observed on the face of the MSE wall. Mr. Schleyer stated that the wall had been picked clean, but that wind had since deposited additional litter. Mr. Schleyer stated that pickers were onsite working to clean up the western face, which I observed. Windscreens were in use at the working face. Wind direction during the inspection was predominantly from the south to southwest (blowing from), with an estimated speed of ten to twenty miles per hour (10-20 mph).
6. Garbage was being disposed of in Cell 4E Stage 2, near the interface with Cell 4D. One (1) truck was being off-loaded by the truck tipper, and one (1) truck was dumping conventionally. No trucks were waiting to unload. No sound was observed from the operation of the truck tipper from the LSA water tower. The garbage is being off-loaded at the top of the western face, and then pushed down the slope to the plateau where it is being permanently disposed.
7. Cover soil is now being imported again. Mr. Schleyer stated that they still have a large amount of soil stockpiled onsite. No Alternative Daily Cover material is being used. I observed that cover soil was being staged near the working face.

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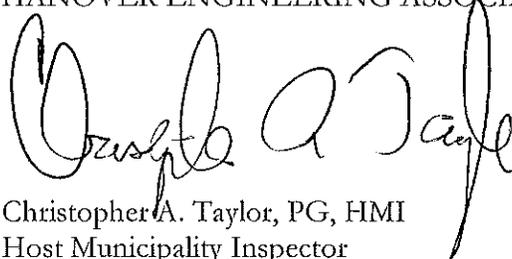
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8. The west high wall was observed. No major changes since the last inspection were evident. No slope failures and no major movement of soil or rock along the wall were observed.
9. The northern spray line was not running at the time of the inspection. Mr. Schleyer stated that they had been run earlier in the day. The southern spray line was being test run during this inspection. Mr. Schleyer stated that they are installing a new mister system at the working face to try on a trial basis. This was not yet operating.
10. Work to construct new Cell 4E Stage 3 was currently taking place, involving the placement of fill soil for the sub base of the cell. Soil to be used for the construction of this cell has been imported and is stockpiled onsite.
11. Mr. Schleyer previously stated that IESI has installed a gas extraction line and connected it to the leachate cleanouts in Cell 4E Stage 2 in an attempt to extract landfill gas from the lower portions of the waste pack. This line is then connected to one of the existing vacuum lines. I observed that this gas extraction line is still in place during this inspection.
12. Mr. Schleyer stated that the installation of new landfill gas wells is now taking place. Two (2) wells have already been drilled. I observed the well rig on site, setting up at the location of the third well. Also, a rehabilitation of gas wells that are "watered in" is also planned. The landfill's consultant, CBI, was observed on site doing work.
13. The access road is clean. Water is being sprayed for dust suppression.
14. I observed a vacuum line at the surface on the top of the MSE wall. Mr. Schleyer explained that the landfill's consultant, CBI, has installed gas collection lines into the crushed stone under the rain flap at the top of the MSE wall (not the bottom) as a means of collecting any gas that may migrate to this point. This is mentioned in a prior Department of Environmental Protection (DEP) report.
15. I observed repairs to multiple areas where methane exceedances were noted by the DEP during their April 21, 2015 inspection. Mr. Schleyer stated that all but two (2) or three (3) of these areas had passed their ten (10) day rechecks after remediation.
16. It was observed that IESI has added soil to and dressed up the southern face (western end) in response to violations for areas of "flagging waste" noted by the DEP during their April 21, 2015 inspection. I observed that this area of the southern face is now clean, with no waste showing.
17. This inspector conducted a patrol through Steel City, beginning at 3:30PM. No landfill-related odors or sounds were observed during this inspection.

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 ASSOCIATES, INC.



Christopher A. Taylor, PG, HMI
Host Municipality Inspector