

Hanover

Engineering Associates Inc

May 22, 2015

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

RE: Inspection Conducted on May 21, 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 "pre-meeting" inspection, which was conducted by me along with Allen Schleyer, Compliance Manager for IESI, Priscilla deLeon, Council Liaison, and Donna Louder, Citizen Representative. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was not running. Mr. Schleyer stated that the plant underwent a planned shutdown for maintenance on May 20, 2015. The chart at the landfill flare recorded the step-wise increase in gas flow to the flare as the BRE plant shut down their two (2) compressors one (1) at a time.
2. The landfill flare was running at a flow rate of 3,300 Standard Cubic Feet per Minute (SCFM) and a temperature of 1,651 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 moderate gas odor was observed at the west end of the MSE wall. A moderate garbage odor was observed between the west end of the MSE wall and the LSA water tower. A strong gas odor was observed at the driveway immediately north of the landfill office at the end of the inspection. No other odors were observed.
5. Litter was observed on the west face. 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 east, but shifted between northeast and south (blowing from), with an estimated speed of zero to fifteen miles per hour (0-15 mph).
6. Garbage was being disposed of in Cell 4E Stage 2, near the interface with Cell 4D. No trucks were being off-loaded by the truck tipper, all trucks were dumping conventionally. 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 still being imported. I observed that piles of cover soil were staged at and near the working face. No Alternative Daily Cover material is being used.

S
eng
ROUTING

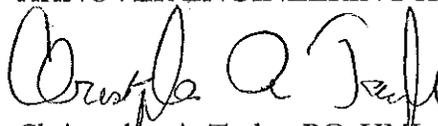
- Council
- Manager
- Asst. Mgr.
- Zoning
- Finance
- Police
- P. Works
- P/C
- P & R
- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EMC
- Other Web

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 were still working on it to make it fully functional. The southern spray line was not running at the time of this inspection. Mr. Schleyer stated that the new mister system that had been placed at the working face on a "trial run" has been removed, and that IESI is considering whether they want to purchase a full-scale version of it.
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 is being imported.
11. Mr. Schleyer stated that trucks hauling all imported soil materials, whether for cover or cell construction, must follow the same Traffic Management Plan as the garbage trucks, and therefore have the same route restrictions.
12. Mr. Schleyer stated that IESI has installed a new twelve inch (12") diameter gas collection header line along the base of the west face, around the "shoulder" of the landfill, and up along the southern face. This line connects into, and collects gas from, new horizontal collectors at the bottom of the west face and new vertical gas wells on the southern face. I observed the fresh trenching and surface elements of this construction work.
13. Mr. Schleyer stated that the installation of new landfill gas wells is continuing, and that eight (8) vertical wells have now been installed. He stated that, of the five (5) wells that were originally identified as being "watered in", two (2) of these cannot be rehabilitated. Two (2) new gas wells will be drilled at these locations. The other three (3) wells are currently being pumped to continue their rehabilitation. The landfill's consultant, CBI, was observed on site doing work.
14. The access road is clean. Water is being sprayed for dust suppression.
15. I confirmed that there is no vegetation or other means of stabilization on the areas of intermediate cover along the shoulder and southern face of the landfill. Mr. Schleyer stated that IESI is evaluating different methods of stabilization for these areas, including vegetation, Posi-Shell, and temporary capping, and is committed to proceeding with this work.
16. This inspector conducted a patrol through Skyline Drive (due to the easterly wind) and Steel City, beginning at 12:40PM. 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