

Hanover

Engineering Associates Inc

JUN 15 2015

June 12, 2015

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

RE: Inspection Conducted on June 4, 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, and Priscilla deLeon, Council Liaison. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was running at limited capacity. Mr. Schleyer stated the plant was still partially shut down for maintenance, and is therefore drawing approximately 1,700 Standard Cubic Feet per Minute (SCFM) of landfill gas.
2. The landfill flare was running at a flow rate of 1,900 SCFM and a temperature of 1,650 degrees Fahrenheit. The largest blower was in operation.
3. The truck wash was in use due to muddy conditions.
4. No blowing litter or odors were observed along Applebutter Road, the entrance driveway, or at the landfill office upon arrival at the facility. Minor dirt was observed along a short portion of Applebutter Road where trucks exit the facility.
5. Ms. deLeon stated that landfill gas odors had been reported to her earlier this day by a resident in the area of Riverside Drive and an additional report or reports was/were called in to PA DEP by a resident or residents in the area of Skyline Drive. In response to these reports, Ms. deLeon requested I patrol the area of Skyline Drive after the site tour. She also informed me the DEP mobile air quality monitoring unit was gathering data at various locations throughout Steel City on this day. Further discussion with Mr. Schleyer revealed the DEP mobile air quality monitoring unit had been at the landfill on Tuesday, June 2, 2015.
6. A slight intermittent gas odor and moderate intermittent garbage odor was observed at the western end of the facility near the LSA water tower and near the base of the west high wall during the inspection tour.
7. Minimal litter was observed in the western portion of the MSE wall and no blowing litter was observed throughout the inspection. Windscreens were in place near the working face. Wind direction during the inspection was predominantly from the southeast, but shifted between northeast and south (blowing from), with an estimated speed of ten to twenty miles per hour (10-20 mph).
8. Garbage was being disposed in Cell 4E Stage 2, near the interface with Cell 4D. One (1) truck was dumping conventionally and none were waiting. One (1) truck was being arranged for off-loading by the tipper.

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ROUTING

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

9. Mr. Schleyer stated IESI is currently limiting their Average Daily Volume (ADV) to no more than 1,000 tons per day.
10. Per Mr. Schleyer, no Alternative Daily Cover material is being used.
11. The west high wall was observed. No major changes were evident. No slope failures and no major movement of soil or rock along the wall were observed.
12. The northern spray line was operating upon our entrance along the access road but had been shut down upon departure. Per Mr. Schleyer, the northern spray line is operated manually and is activated based on wind direction. The southern spray line was in operation at the time of inspection and is on an automatic timer set to run 15 minutes on and 15 minutes off. Mr. Schleyer reiterated that IESI is still evaluating whether to purchase the mister system that had been previously used for a trial run at the working face.
13. Ms. deLeon stated the landfill related odors seem to be less frequent and less intense recently, and questioned if there is any known reason for this. Mr. Schleyer responded he has taken extra precautions by going above the minimum requirement for daily cover material and further theorized that the new gas wells and 12-inch header pipe recently installed, which is now tied in, may be extracting more gas and allowing less to escape to the surface.
14. Work to construct new Cell 4E Stage 3 was suspended at the time of inspection due to wet weather conditions from storms earlier in the week. Soil to be used for construction of this cell was observed stockpiled on site.
15. New gas collection piping was observed along the base of the west face near the eastern edge of new Cell 4E Stage 3. Several hundred feet of horizontal piping was observed in this area with multiple vertical wells already tied in. Ongoing work is being performed by the landfill's contractor, CBI.
16. Quarterly groundwater sampling is scheduled for the week of June 15, 2015. Mr. Schleyer will confirm the North Slope access road is passable prior to that time to ensure the sampling can take place.
17. There remains 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 IESI is still evaluating different methods of stabilization for these areas.
18. Minor erosion rills were observed on the western face of cell 4E resultant from storms earlier in the week. Repair work has begun, however much of the sloped areas were still too wet to navigate with the machinery required for repair. Mr. Schleyer ensured these areas would be repaired as soon as conditions improve.
19. As requested, this inspector conducted an odor patrol through Skyline Drive and Hader Lane beginning at 11:04 a.m. A very slight intermittent gas odor was detected near the end of Hader Lane at approximately 11:17 a.m. Further patrol was conducted through Steel City along Riverside Drive and through the narrows. No landfill-related odors or sounds were observed during this inspection which concluded at 11:32 a.m.

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.



Jacob A. Schray
Host Municipality Inspector

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