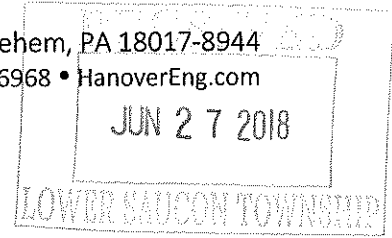


HanoverEngineering

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June 25, 2018

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

RE: Inspection Conducted on June 21, 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 Nick Rogers, Environmental Compliance Manager. The following items were noted during the inspection:

1. The BRE plant was not running. Mr. Rogers stated that they had been down since early this morning as part of an outage for planned annual maintenance.
 2. The landfill flare was running at a flow rate of 3,450 scfm and a temperature of 1,655 degrees Fahrenheit, and appeared to be operating normally. There were no visible emissions from the flare. Mr. Rogers reported that he has seen no visible emissions from the flare. The bar graph on the instrument panel indicated that the flare was running at eighty-three percent (83%) 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 June 18. The chart showed increased gas flow to the flare starting this morning, corresponding with the BRE shutdown.
 3. Mr. Rogers stated that their consultant, EarthRes Group (ERG), has performed troubleshooting on the flare operation, concentrating on the functioning of the louvers, and that he has received the results of that investigation. ERG found that the louvers are not operating perfectly in sync, and that this caused the visible emissions incidents. They found that the four (4) banks of louvers were being operated by two (2) different controllers via a very complicated computer program that was installed when the largest blower was installed around 2014, and that the controllers were not working together properly. He has instituted a temporary fix, and has ordered that a new program be written and installed that will operate the louvers from one (1) controller.
- Mr. Rogers stated that the newly installed gas wells are still being connected to the collection system. He stated that a new twelve-inch (12") loop header was also being installed at the top west end to replace an existing header that is under eighty to one-hundred feet (80' - 100') of garbage and is becoming watered in. This work was observed taking place during the inspection.
- The truck wash was not in use due to dry conditions.

S

ROUTING

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6. No mud, blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. A water truck was observed loading water in preparation for spraying the internal roads for dust suppression.
7. A small amount of wind-blown litter was observed on the south face below the upper working face. No litter was observed elsewhere on site.
8. Wind during the inspection was calm to northwest at 5 mph. Conditions were cloudy at first, then sunny, no rain, and in the seventies.
9. Garbage was being disposed of toward the eastern end of the top of the landfill in an area previously approved as part of the expansion in two (2) working faces: an upper working face at the very top, and a lower working face below this one. Local collection trucks were using the construction road that is located where the original haul road was (between the new Cell SE-1A and the new MSE wall) to access the lower working face. Larger trucks are using the south face haul road to reach the upper working face. At the lower working face, one (1) compactor was running to spread and compact garbage. At the upper working face, the truck tipper was not in use and no trucks were waiting. No trucks were unloading conventionally at the time. Cover soil was being staged at the upper working face and spread on the side slopes around the upper working face. The portable mister was not in operation at the working face. Portable wind screens were not in use at the working face due to calm conditions. The approach road to the working face is very stable.
10. Neither the north or south fixed mister lines were in use.
11. Areas of daily and intermediate cover are adequate to cover garbage, with no flagging garbage or seeps observed. No odors were observed beyond the working face.
12. Mr. Rogers stated that a full Surface Emission Monitoring (SEM) event was conducted by SCS on June 18, 2018, and that PA DEP Air Quality representatives accompanied them for part of this. A full report of those results has not yet been received, but Mr. Rogers was advised verbally that eleven (11) exceedances were found.
13. The north slope road was driven. No washouts were observed in the downhill portion of the road where this had occurred previously. The road was open and accessible.
14. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
15. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
16. 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 still being constructed as part of the Southeast Realignment.
17. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:57 a.m. No landfill-related odors were observed. The sight of the landfill is mostly screened out by leaves on the trees now. The sound of tracked equipment running on the landfill, travel/backup alarms, tailgate "slapping," and trucks driving on the landfill roads was observed. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:39 a.m. No landfill-related odors were observed. The sound of travel alarms, and the sight and sound of garbage trucks on the landfill (south face haul road) were observed from the end of Skyline Drive. I conducted a driving patrol through Steel City after the inspection, starting at 11:52 a.m. No landfill-related odors or sounds were observed. No landfill-related issues were observed on the driving patrol through the Narrows.

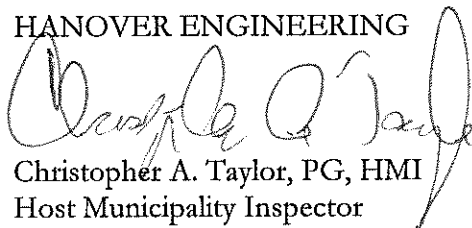
Activity Related to the Southeast Realignment Expansion

18. Construction activity related to the expansion is continuing in new Cell SE-1A. The construction of the subbase, with placement of reinforcing fabric covered with screened soil, has been completed. Construction of the bottom liner is now taking place. Rob Tyler of Martin and Martin is onsite overseeing the construction work.
19. New Sedimentation Basin 2 has recently been cleaned of sediment.

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

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