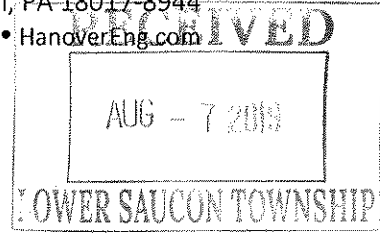


Hanover Engineering

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August 5, 2019

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

RE: Inspection Conducted on August 1, 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, District Manager. The following items were noted during the inspection:

1. The BRE plant has passed its scheduled permanent shut-down date of June 1, 2019 and was not running. However, the plant owner, Exelon, has issued a letter to Lower Saucon Township Council dated June 7, 2019 stating that they have entered into a Sale and Purchase Agreement with another company. The status of the plant will be monitored.
2. The landfill flare was not running. Mr. Pannucci stated that the flare had been shut down on July 23 and 24 to allow for adjustment of the vacuum on the well field. When it came back on line on July 25, visible emissions were observed from the stack. The flare was shut down again, at which time Mr. Cody White (landfill gas technician) cleaned the "burner tips," which solved the problem with visible emissions. Finally, the flare was taken off line the morning of the inspection in order to clean out the "knock out pots," which is where the condensate contained in the gas is collected. A vacuum truck was observed at the flare with the crew readying to conduct this work. The flare is expected to be back up and running the same day. The paper chart went back to July 18 and reflected the shut downs described above.
3. The truck wash has been intermittently out of commission this week due to a leak in the plumbing, which it took several attempts to fix. The truck wash was not working upon my arrival but was put back online and functioning properly prior to the end of the inspection. No blowing litter, mud, or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. Weather conditions were clear, temperature in the 70s, and wind from the east/northeast at five to ten (5 - 10) miles per hour. The customer convenience area is in use for small vehicles. Mr. Lawson stated that waste acceptance rates have been running about 1,100 to 1,300 tons per day. Garbage was being disposed of at one (1) working face on the top of the landfill and pushed eastward down the slope for disposal in Cell SE-1A. The approach to and departure from

ROUTING

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- Manager
- Asst. Mgr.
- Zoning
- Finance
- Police
- P. Works
- P/C
- P & R
- EAC
- Engineer
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- Landfill
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- Other

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- the working face were stable. One (1) truck was unloading on the tipper, with none waiting for the tipper. One (1) truck was unloading conventionally (dump body or walking floor), with zero (0) waiting. Two (2) dozers were spreading and placing garbage. One (1) compactor was in use. Trucks were observed hauling soil from an on-site stockpile to areas of the working face already filled and spreading the soil for daily cover. Mr. Lawson stated that a combination of soil and tarps will be used to for daily cover. Wind screens were being used near the working face. A moderate garbage odor was observed in the vicinity of the working face. No odors were observed anywhere else on site.
9. The south face has been dressed and picked to remove garbage showing at the surface. Mr. Lawson stated that one (1) picker was working to remove remaining litter from the south face.
 10. No windblown litter was observed in the trees or on the ground to the east of Cell SE-1A.
 11. The north slope road was driven. The entrance to the road has had #4 crushed stone installed. The remainder of the road has been tracked with a dozer to smooth and widen it. The road bed, riprap swale, and rock check dams were in good shape with little or no erosion observed.
 12. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 13. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 14. It was observed that a street sweeper was cleaning the internal roads during the inspection. Upon leaving the facility, the street sweeper was observed cleaning the eastbound lane of Applebutter Road.
 15. Erosion rills are persisting on the slope below the south face haul road. Mr. Lawson stated that the swale on the upslope side of the haul road was still being enhanced to better control the flow of stormwater, but that the excavating machine doing this work had thrown a track. It was observed during the inspection that the work to widen and deepen the swale and add large stones to it to make a channel to carry stormwater flows had progressed. The disabled excavating machine was observed. It was previously observed that water crosses the haul road in an area where it slants downward toward the outside, and that erosion is caused here. Mr. Lawson previously stated that the road must be pitched to the inside where the swale is being constructed.
 16. Construction work on the main gabion down channel is now postponed until the fall according to Mr. Pannucci.
 17. Mr. Pannucci stated that the silt socks have now been placed at the two (2) stormwater outfalls as required by the PA DEP.
 18. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. Two (2) out of fifteen (15) trucks were overweight, by 820 pounds and 920 pounds.
 19. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:00 a.m. No landfill-related odors were observed. The sight and sound (engines, vehicle tracks, and travel alarms) of trucks, dozers, and compactor 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 11:27 a.m. No landfill-related odors were observed. The sight and sound of 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 11:40 a.m. No landfill-related sounds or odors were observed. From the entrance to the Hill Climb no trucks were observed on the landfill road on top of the

MSE wall, since this is no longer the route taken by trucks which have already unloaded and are heading toward the landfill exit. On the driving patrol through the Narrows it was observed that the road immediately downslope of the runoff point from the landfill was clean.

Activity Related to the Southeast Realignment Expansion

20. Construction in future Cell SE-1B is now complete. Mr. Pannucci stated that they are awaiting certification from PA DEP before they can begin placing garbage here. Certification is expected any day.

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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