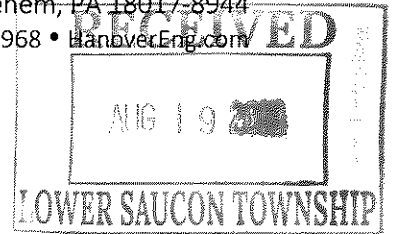


HanoverEngineering

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August 15, 2019

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

RE: Inspection Conducted on August 15, 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 "pre-meeting" inspection. The inspection was conducted by me along with Astor Lawson, District Manager and Phillip Garcia, newly hired as the Operations Supervisor. 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 running at a flow rate of 2,957 standard cubic feet per minute (scfm) and a temperature of 1,642 degrees Fahrenheit. The flow rate was reading as eighty-three percent (83%) of the variable frequency drive. The largest blower was in operation. This readout had been incorrectly reading one-hundred percent during several past inspections. Mr. Lawson stated that the new blower motor has been synched to the instrumentation so that this now reads correctly. Mr. Lawson stated that no visible emissions were observed from the stack since the last inspection. The paper chart went back to August 6 and reflected a shutdown on August 12 for several hours. Mr. Lawson stated that SCS shut down the flare at this time to work on in. The chart also showed a brief protective shutdown around midnight on August 13.
3. The truck wash was open and working.
4. No blowing litter, mud, or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot.
5. Weather conditions were partly cloudy, temperature in the 70s, and wind from the north/northeast at zero to five (0 – 5) miles per hour. The customer convenience area is in use for small vehicles.
7. Mr. Lawson stated that waste acceptance rates have been running about 1,600 tons per day.
8. Mr. Lawson stated that certification approval for Cell SE-1B was received on August 2, 2019 and that disposal began taking place in that cell on Monday August 5. Garbage was being disposed of at one (1) working face at the western end of Cell SE-1B. The approach to and departure from 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

- S
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- walking floor), with one (1) truck waiting. Two (2) dozers were spreading and placing garbage. One (1) compactor was in use. Trucks were observed hauling soil to the working face for daily cover. Mr. Lawson stated that the soil was being trucked in from off site. 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. The leading eastern edge of garbage placement is within the initial "fluff lift," which must be eight feet (8') thick and receive only municipal solid waste. A spotter was present here, checking for and removing any large objects that could damage the liner. The western end of the cell has the fluff lift already in place and is receiving Construction and Demolition waste.
9. The eastern end of the south face has been dressed and removal of flagging garbage will continue. Mr. Lawson stated that he plans to have the remaining flagging garbage removed, then complete hydroseeding in September.
 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 road bed, rip-rap 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. Upon arriving at the facility, evidence was observed that a street sweeper had recently cleaned both lanes of Applebutter Road (were wet.) The sweeper was observed cleaning the entrance drive and internal roads during the inspection.
 15. No work to improve stormwater management along the south face haul road has taken place since the last inspection.
 16. It was observed that work was taking place on the north face to repair a seep.
 17. One (1) picker was working on site.
 18. A crew was observed entering a leachate management chamber to conduct work. Mr. Lawson stated that this was routine maintenance on the controls for the leachate pumps.
 19. A vacuum truck was observed on site. Mr. Cody White was encountered at the scale house and stated that the truck was pumping out Leachate Management Chambers 6 and 10 to allow entry by the crew to conduct maintenance. He stated that the company was Control Systems 21.
 20. Mr. Lawson stated that he is obtaining bids from contractors to clean the accumulated sediment out of Sedimentation Basin 6.
 21. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. Two (2) out of nineteen (19) trucks were overweight, by 1,220 pounds and 2,100 pounds.
 22. 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 of trucks and equipment working on the landfill was observed, including a vacuum truck. 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 11:28 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.

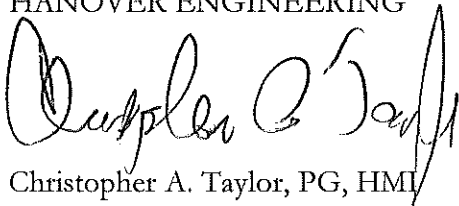
Activity Related to the Southeast Realignment Expansion

23. Cell SE-1B has received certification from PA DEP and is receiving garbage.

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

A handwritten signature in black ink, appearing to read "Christopher A. Taylor". The signature is written in a cursive, somewhat stylized font.

Christopher A. Taylor, PG, HMI
Host Municipality Inspector

cat: llb

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