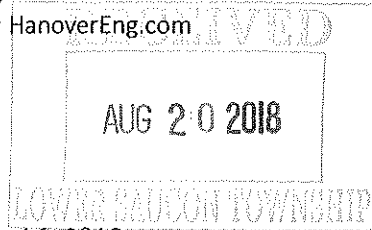




HanoverEngineering

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August 16, 2018

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

RE: Inspection Conducted on August 16, 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, the Environmental Compliance Manager. The following items were noted during the inspection:

1. The BRE plant was running. Mr. Rogers stated that they had been down for planned maintenance on August 13 and 14 but were now running both compressors and drawing about 1,800 scfm of gas.
2. The landfill flare was running at a flow rate of 2,000 scfm and a temperature of 1,653 degrees Fahrenheit and appeared to be operating normally. There were no visible emissions from the flare. The bar graph on the instrument panel indicated that the flare was running at fifty-five percent (55%) of the Variable Frequency Drive (VFD) capacity. The largest blower was in operation. The paper chart was new and provided no record of gas flow. Mr. Rogers stated that the last flare outage occurred the week prior and was due to a thermocouple going bad. This has since been repaired.
3. The truck wash was in use due to wet conditions.
4. No blowing litter or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or the office parking lot. I observed a street sweeper cleaning the westbound lane of Applebutter Road as I first arrived. I observed the street sweeper cleaning interior road several times during the inspection.
5. No wind-blown litter was observed on the site.
6. Wind during the inspection was calm from the west at 5 mph. Weather conditions were sunny, no rain, and hot. Heavy rain had fallen two (2) days prior. Garbage was being disposed of at the eastern end of the top of the landfill at two (2) working faces: a lower working face over Cell 4A and an upper working face over Cell 4B. All trucks are using the south face haul road to approach and leave both working faces. The lower working face is being used to unload trucks on the truck tipper, which was in use unloading one (1) truck, with zero (0) waiting. The upper working face is being used to unload local collection trucks and walking floor trucks, with one (1) truck unloading and zero (0) waiting to unload. Garbage odors were observed near both working faces. The portable mister was in operation but was not close to the working face. The approach road

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 - Zoning
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 - P/C
 - P & R
 - EAC
 - Engineer
 - Solicitor
 - Planner
 - Landfill
 - EMC
 - Other *Webster*

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- to the lower working face from the south haul road is narrow and heavily rutted. The approach road to the upper working face is also heavily rutted and was being smoothed out by a loader during the inspection.
8. Neither the north or south fixed mister lines were in use.
 9. Areas of daily and intermediate cover are adequate to cover garbage, with no flagging garbage or seeps observed.
 10. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 11. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 12. 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 has been constructed as part of the Southeast Realignment but cannot be utilized until other construction in the area has been completed.
 13. The north slope road was driven. It was observed that the leg of the road running down hill had just been graded. Mr. Rogers stated that this was the repair of erosion ruts that had developed due to heavy rains at the beginning of the week. However, the material used to fill the ruts and regrade the road was mostly soil with some rock. This material will very easily be washed away during the next heavy rain and most likely be carried down the north slope and deposited onto Riverside Drive.
 14. Mr. Rogers noted that the sedimentation traps and basins need to be cleaned out when time and conditions permit.
 15. Mr. Rogers stated that, on his drive into the landfill this morning, he observed seven or eight (7 or 8) trucks staged on Shimersville Road just before 7:00 am. This is not allowed per the landfill's Traffic Control Plan.
 16. 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 machinery, truck engines, and travel/backup alarms, was observed coming from the landfill. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:41 a.m. No landfill-related odors were observed. The sight and sound of garbage trucks and dump 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 11:53 a.m. No landfill-related odors or sounds were observed from the entrance to the Hill Climb. On the driving patrol through the Narrows it was observed that the road downslope of the runoff point from the landfill was clean. No water was running at the time of the inspection.

Activity Related to the Southeast Realignment Expansion

17. Construction activity related to the expansion is continuing in new Cell SE-1A. Rob Tyler of Martin and Martin was onsite overseeing the construction work. He stated that stormwater runoff had gotten under the liner and damaged the subbase in the southwest corner of the cell, which is the sump area. He stated that the liner material was removed in the affected area, the subbase was repaired, and the liner material was currently being put back in place. In other areas, the primary liner has to be finalized in a few spots.

Ms. Leslie Huhn
Township Manager

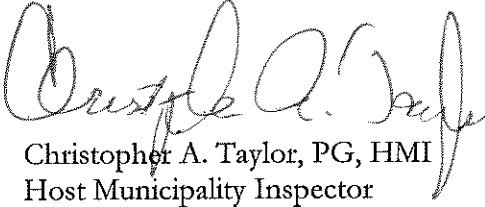
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August 16, 2018

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 fluid and cursive, with a large initial "C" and "T".

Christopher A. Taylor, PG, HMI
Host Municipality Inspector

cat: llb

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