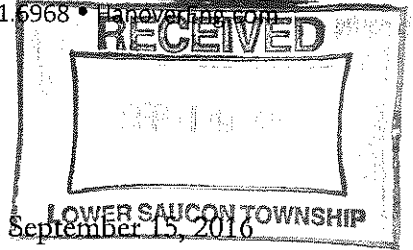


Hanover Engineering

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Phone: 610.691.5644 • Fax: 610.691.5968

September 15, 2016



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

RE: Inspection Conducted on September 15, 2016
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, which was conducted by me along with Mr. Nick Rogers, Compliance Manager, Ms. Donna Louder, Citizen Representative, and Mr. Thomas Louder, Citizen Representative. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was running. Mr. Rogers stated that the plant was running on one (1) compressor, at about half capacity. He stated that the plant restarted last night, and had been down since Saturday September 10, 2016.
 2. The landfill flare was running at a flow rate of 1,848 Standard Cubic Feet per Minute (SCFM) and a temperature of 1,637 degrees Fahrenheit. Compared to the flare's design capacity of 4,000 scfm, this flow rate equates to approximately forty-six percent (46%) of the flare's capacity. Mr. Rogers explained that the bar graph on the instrument readout which measures a percentage of flow rate actually indicates the flow rate relative to the capacity of the Variable Frequency Drive (VFD) which controls the speed of the compressor motor, not the capacity of the flare as indicated in previous reports. The bar graph indicated that the flow rate was approximately fifty-three percent (53%) of the VFD. The paper chart record only went back to September 14 and showed the variation in gas flow associated with the BRE restart on September 14. The largest blower was in operation. The truck wash was not in use due to dry conditions.
- No mud, odor, or blowing litter were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or at the office parking lot. Some light sediment was present on Applebutter Road. Mr. Rogers confirmed that the bi-weekly street sweeping operation was still ongoing and that this would take care of the sediment on the road.
- The northern mister line was observed to be running during the inspection. The southern mister line was also observed running.
- Wind during the inspection was from the north/northeast at an estimated ten to twenty miles per hour (10 – 20 mph).
- Garbage was being disposed of in Cell 4E Stage 3. Two (2) trucks were observed dumping, with zero (0) waiting. Trucks are still approaching and departing the working face from the

ROUTING

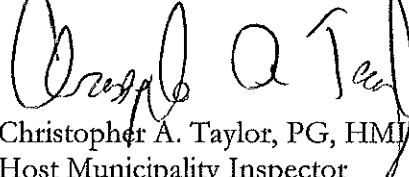
- Council
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- Asst. Mgr.
- Zoning
- Finance
- Police
- P. Works
- P/C
- P & R
- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EMC
- Other *Web*

- top of the landfill. Windscreens were in place at the working face. The box wire "catch" fence is still in place.
8. Cover soil is still being imported. No Alternative Daily Cover material is being used. Cover soil is being stockpiled in a new location, at the top of the slope on the eastern end of the landfill.
 9. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 10. The temporary cap on the southern face was observed, and no inflation was observed. Mr. Rogers stated that there have been no recent problems with inflation of the cap.
 11. The construction of the remainder of the MSE wall has not progressed since the last inspection. The wall was stopped where the existing grade dropped too steeply along its course. However, the filling that will create new Cell 4E Stage 4 has advanced since the last inspection and is close to creating the base upon which the wall will be built. The elevation of the top of the fill in this area is almost up to the elevation of the base of the MSE wall. Ongoing filling in this area was observed during this inspection. A storm sewer line running to the south was observed to be newly constructed through this area.
 12. The cleanout of accumulated soil in Basin 4 has restarted due to drier conditions.
 13. Mr. Rogers stated that the final results of the PA DEP and SCS (landfill Air Quality consultant) joint air quality site inspection on August 23 and 24 revealed ten (10) areas where methane exceeded five hundred parts per million (500 ppm). These areas were remediated, and all have passed the ten (10) day recheck. The thirty (30) day recheck is pending.
 14. An intermittent working face (garbage) odor was observed by the LSA water tower. A persistent working face odor was observed at the western end of the southern access road (directly downwind of the working face).
 15. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:17 AM. No sounds from the flare, truck traffic, or equipment was observed, and no landfill-related odors were observed. I conducted a driving patrol along Skyline Drive before the inspection, starting at 10:05 AM. No landfill-related odors were observed. One (1) short episode of equipment noise was observed. I conducted a driving patrol through Steel City after the inspection, starting at 11:55 AM. No landfill-related were observed. The faint sound of a travel alarm was observed.

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:cat/llb