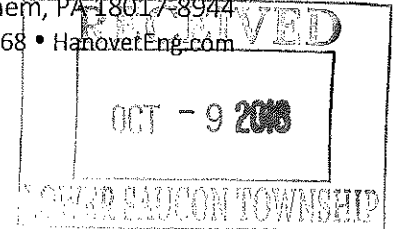


Hanover Engineering

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October 5, 2018

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

RE: Inspection Conducted on October 4, 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 "Mid-meeting" inspection. The inspection was conducted by me along with David Pannucci, District Engineer and Jayme Steigerwalt, Operations Manager. Donald Hallock, General Manager, was on vacation. Nick Rogers, formerly the Environmental Compliance Manager, has resigned from Waste Connections. The following items were noted during the inspection:

1. The BRE plant was running. Based on the flow rate at the flare, the BRE plant was operating on one (1) compressor.
2. The landfill flare was running at a flow rate of 2,280 scfm and a temperature of 1,658 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 sixty percent (60%) of the Variable Frequency Drive (VFD) capacity. The largest blower was in operation. The paper chart went back to September 25, 2018 and indicated fairly steady gas flow, with the exception of a small increase on September 30, and an equal small decrease on October 2.
3. The truck wash was in use due to wet conditions from Tuesday night's rain.
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. No wind-blown litter was observed on the site.
6. Wind during the inspection was calm. Weather conditions were sunny, hazy, and warm.
7. Garbage was being disposed of toward the middle of the landfill in Phase IV. Long haul tractor trailers were being unloaded using the truck tipper. One (1) truck was unloading on the tipper and one (1) was waiting to unload. Local collection trucks were unloading conventionally. One (1) truck was unloading and none waiting to unload. One (1) compactor was running at the working face. All trucks are using the south face haul road to approach and leave the working face. The portable mister was not in operation. The approach road to the working face was stable and passable. Mr. Pannucci reported that acceptance rates have still been running about 1,300 tons per day.
8. The north mister line was not in use. The south mister line had previously been removed. It was previously reported that it will be installed closer to the new cell.

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 - EAC
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 - Solicitor
 - Planner
 - Landfill
 - EMC
 - Other
- webster

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. As reported previously, the entire length of the road running downhill from the maintenance shop to the western end had been compacted, and the swale along the south side of the road had been cleaned out and relined with large stones. Also, large stones had been piled in front of the two (2) locations where stormwater runs off the road northward before leaving the site. This includes the area of the concrete spillway. During the current inspection, it was observed that the roadbed is still in good shape, with no erosion rills except between the upper and lower runoff points. As previously reported, the section still needs to be covered with compacted stone. More stones have been added in front of the lower runoff point, as previously requested.
14. Hydroseeding of about five (5) acres of the southern face has begun and was taking place during this inspection, as previously scheduled.
15. A water truck was observed spraying internal roads for dust suppression.
16. The issue of the height of the landfill was discussed in response to a citizen concern relayed to the Township. The plans showing the approved grading and maximum elevations for the Southeastern Realignment were reviewed. The method used to monitor and control the elevation of the landfill was discussed. Mr. Pannucci stated that the site surveyor places "grade stakes" in the area of the working face. These guide the operators as to where to place garbage, and to what height. During the inspection, the most recent grade stakes were observed. They were placed along the top of slope of the southern face. The labeling on the stakes indicated a fill amount, in feet, "to garbage top slope." Additional stakes were observed on the opposite side of the top area. I requested that Mr. Pannucci provide me with information from the surveyor showing the location of the stakes relative to the grading plan, and the existing and proposed elevations at each stake location. He stated that he would provide that information.
17. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:50 a.m. No landfill-related odors were observed. Portions of the landfill are now visible through the trees. The sounds of machinery working and truck engines coming from the landfill were faintly audible above the background noise. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:23 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 11:35 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. At the point where the swale leading down the north slope from the landfill meets Riverside Drive, a small tree is still laying down on the pole-mounted utility wires. This was previously observed and documented during a prior washout event.

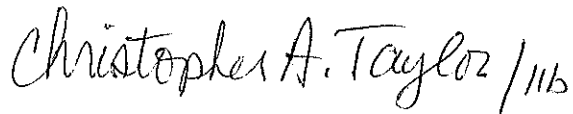
Activity Related to the Southeast Realignment Expansion

18. 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. Protective stone cover has now been placed over all areas of the liner. The installation of the leachate Collection Zone piping was taking place. Sediment Basin 2 has collected water and was being pumped out to facilitate hydroseeding.
19. In the area of future Cell SE1-B, topsoil was being stripped in preparation for construction of that new cell.

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

Handwritten signature of Christopher A. Taylor in cursive, with a vertical line through the signature.

Christopher A. Taylor, PG, HMI
Host Municipality Inspector

cat: llb

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