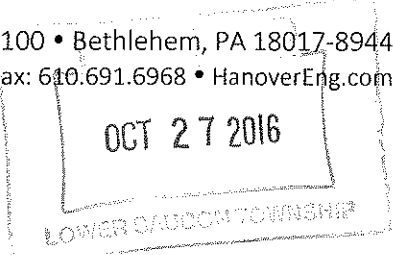


Hanover Engineering

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October 25, 2016

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

RE: Inspection Conducted on October 20, 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. Priscilla deLeon, Council Liaison, Ms. Donna Louder, Citizen Representative, Ms. Diane Palik, Township Administrator, and Mr. Kal Sostarecz, Assistant to the Township Manager. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was not running. Mr. Rogers stated that the plant was taken offline at 8:30A on this date to change filters. He stated that the plant has been running at one hundred percent (100%) of late, but has been shutting down once per week for two to three (2 – 3) hours at a time for maintenance. Mr. Rogers stated that it was discovered that the plant had been drawing Oxygen into the gas line that feeds it when it shut down. This forced the plant to purge that line upon restart, which in turn necessitated shutting down the landfill flare. This situation has now been rectified: Oxygen is no longer drawn into the gas line upon shutdown. This will allow the plant to restart without having to shut down the landfill flare. This will cut down on flare outages, saving wear and tear on the flare equipment. It should also cut down on odor emissions from the BRE plant, since the purging process released some methane to the atmosphere.
2. The landfill flare was running at a flow rate of 3,400 Standard Cubic Feet per Minute (SCFM) and a temperature of 1,660 degrees Fahrenheit. The bar graph on the instrument readout indicated that the flow rate was approximately ninety percent (90%) of the Variable Frequency Drive (VFD) capacity. Mr. Rogers stated that this was higher than it had been previously for about this same flow rate due to how the wellfield was "tuned." The paper chart record went back to October 10 and showed no shutdowns. The largest blower was in operation.
The truck wash was not in use due to dry conditions.
No mud, blowing litter, or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or at the office parking lot.
The northern mister line was observed to be running during the inspection. The southern mister line was also observed running.

ROUTING

- Council
- Manager
- Asst. Mgr.
- Zoning
- Finance 3.
- Police 4.
- P. Works
- P/C
- P & R 5.
- EAC
- Engineer
- Solicitor
- Planner
- Landfill

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6. Wind during the inspection was from the east/southeast at an estimated five to ten miles per hour (5 – 10 mph).
7. Garbage was being disposed of in Cell 4D. Three (3) trucks were observed dumping, with one (1) waiting. Trucks are still approaching and departing the working face from the top of the landfill. Windscreens were in place at the working face. The box wire “catch” fence is still in place. Daily cover was being staged at the working face. A slight working face odor was observed near the LSA water tower, downwind of the working face.
8. Cover soil is still being imported. No Alternative Daily Cover material is being used. Cover soil is still being stockpiled 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. No inflation of the cap was evident.
11. Construction of new Cell 4E Stage 4 has advanced since the last inspection and was continuing. The synthetic liner was being placed throughout and is complete up to the anchor trench on the western edge of the liner. The protective layer of crushed stone was being placed over the liner.
12. Mr. Rogers stated that the street sweeping program of Applebutter Road every other Friday is still continuing.
13. The north slope road was driven and is open, but in fair shape. Mr. Rogers was requested to have vegetation cut back along the sides to make the road more open.
14. The cleanout of sediment from Basin 4 has progressed and will continue if conditions are dry enough.
15. Hydroseeding was taking place at the top of the south face. Mr. Rogers stated that this was to provide stabilization.
16. The new eastern stockpile was observed. As previously reported, benches have been constructed in the sides of the pile to prevent sliding. Newly observed was that silt fence had been installed downslope of the pile, as discussed with Mike Sheldon, Operations Manager, during the last inspection. The presence of Silt Soxx was not readily observable; Mr. Rogers stated that he would follow up with Mr. Sheldon to confirm that this had been installed. It was observed that the sides of the pile were being hydroseeded during the inspection. The entire area of the pile is tributary to Sedimentation Basin 2, so that any sediment that gets past the control measures will be captured by that basin.
17. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 10:03 AM. No sounds from the flare were observed, and no landfill-related odors were observed. Sounds of truck traffic on the landfill were observed. One (1) dump truck was observed driving eastbound on Applebutter Road, past Ringhoffer Road, and appeared lost. The same truck was then observed driving back westbound, toward the landfill. I advised Mr. Rogers of this. I conducted a driving patrol along Skyline Drive after the inspection, starting at 12:22 PM. No landfill-related odors or sounds were observed. I conducted a driving patrol through Steel City and the Narrows (newly re-opened) starting at 12:33 PM. No landfill-related odors or sounds were observed.

Ms. Leslie Huhn
Township Manager

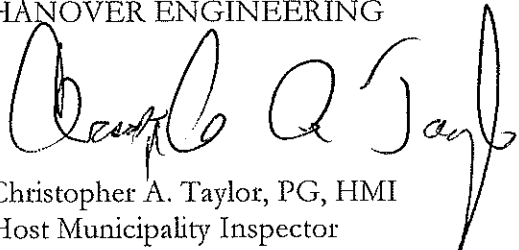
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October 25, 2016

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 style with a large, prominent initial "C".

Christopher A. Taylor, PG, HMI
Host Municipality Inspector

cat:llb

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