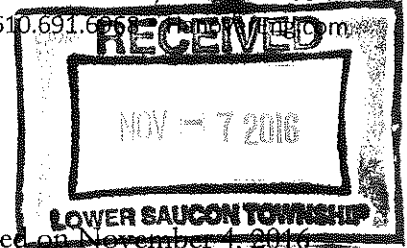


Hanover Engineering

252 Brodhead Road • Suite 100 • Bethlehem, PA 18017-8944

Phone: 610.691.5644 • Fax: 610.691.6258



November 4, 2016

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

RE: Inspection Conducted on November 4, 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 "Mid-meeting" inspection, which was conducted by me along with Mr. Nick Rogers, Compliance Manager, and Ms. Donna Louder, Citizen Representative. The inspection began with a pre-arranged tour of the BRE plant, led by Mr. Ken Minton, Site Manager for Exelon Generation. The following items were noted during the inspection:

1. The Bethlehem Renewable Energy (BRE) plant was operating at full capacity, with both compressors running. The plant was drawing 2,285 standard cubic feet per minute (scfm) of natural gas. Mr. Minton provided an overview of plant operations and equipment. He stated that the plant is still undergoing scheduled shutdowns approximately once per week, mainly to clean filters. He stated that the residual waste tank is being emptied by tanker truck about five to six (5 – 6) times per month. He stated that all plant operations are running smoothly with no major issues of late.
2. The landfill flare was running at a flow rate of 850 scfm and a temperature of 1,600 degrees Fahrenheit. The bar graph on the instrument readout indicated that the flow rate was approximately thirty-two percent (32%) of the Variable Frequency Drive (VFD) capacity. The paper chart record was brand new and provided no recent history. The largest blower was in operation.
3. The truck wash was not in use due to dry conditions.
4. No mud, blowing litter, or odors were observed along Applebutter Road up to Ringhoffer Road, the entrance driveway, or at the office parking lot.
5. The northern mister line was not running during the inspection. Mr. Rogers stated that it had been taken offline to accommodate the reconstruction of the access road that runs along the north perimeter fence.
6. The southern mister line was observed running. IESI has recently stated that this line has been taken off the timer and set to run continuously.
7. Wind during the inspection was from the west at an estimated zero to five miles per hour (0 – 5 mph).

S

ROUTING

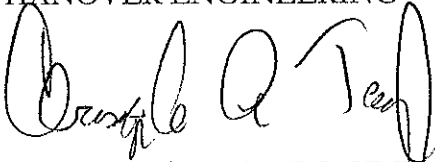
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- P/C
- P & R
- EAC
- Engineer
- Solicitor
- Planner
- Landfill
- EMC
- Other web

8. 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 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 gas odor was observed at the eastern end of the MSE wall and again near the LSA water tower. Mr. Rogers attributed this to the anchor trench tie-in being open along the bottom of the western face.
9. Construction of new Cell 4E Stage 4 is essentially complete. Mr. Rogers stated that they are awaiting certification of the cell construction.
10. Cover soil is still being imported. No Alternative Daily Cover material is being used. Cover soil is now being stockpiled along the access road that leads to the maintenance building. Stockpiling at the top of the slope on the eastern end of the landfill has ceased for now.
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 temporary cap on the southern face was observed. No inflation of the cap was evident.
13. Mr. Rogers stated that the drilling contractor is scheduled to begin installing new gas wells at the western end of the landfill next week.
14. It was observed that work was being conducted on a drainage swale at the north end of the top of the western high wall. There is an existing swale in this location. It appeared that the work was being done to construct a new swale to tie into the existing swale.
15. I conducted a driving patrol through Steel City and the Narrows before the inspection, starting at 9:42 AM. No landfill-related odors or sounds were observed. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:58 AM. No sounds from the flare were observed, and no landfill-related odors were observed. No truck traffic on landfill roads was present at this time. I conducted a driving patrol along Skyline Drive before the inspection, starting at 10:05 AM. No landfill-related odors or sounds were observed. It should be noted here that there was a lot of noise coming from the Calpine power plant immediately to the south of this location at this time, which may have been drowning out other sounds.

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: llb