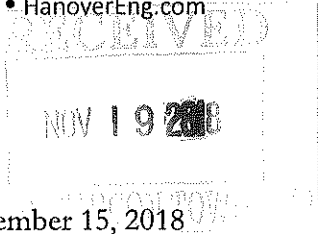


Hanover Engineering

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November 16, 2018



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

RE: Inspection Conducted on November 15, 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 Robert McReynolds, Northeast Division Vice President, Donald Hallock, District General Manager, and Cody White, Landfill Gas Technician. The following items were noted during the inspection:

1. The BRE plant was not running. Mr. Hallock stated that they had been down since November 5 due to electrical issues and that PPL was working with plant personnel to identify and fix the problem.
 2. The landfill flare was running at a flow rate of 3,440 scfm and a temperature of 1,653 degrees Fahrenheit and appeared to be operating normally. There were no visible emissions from the flare. Mr. Hallock stated that there have been no visible emissions episodes since the last inspection. The bar graph on the instrument panel indicated that the flare was running at seventy-seven percent (77%) of the Variable Frequency Drive (VFD) capacity. The largest blower was in operation. The paper chart goes back to November 5 and shows relatively steady gas flow since then. Mr. White stated that EarthRes Group was brought in to adjust the louver operation, since the flare temperature was running high.
 3. The truck wash was open and in use due to muddy conditions.
 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. Some wind-blown litter was observed on the south slope, below new cell SE-1A. Mr. Hallock stated that one (1) picker was on site and he would direct him to remove litter in this area.
- Wind during the inspection was from the east at 5 to 10 mph. Weather conditions were cloudy and cold.
- Garbage was being disposed of in two (2) working faces. The main working face was at the top west end of the landfill in Cell 3B. Long haul tractor trailers were being unloaded using the truck tipper and walking floor trailers were also unloading here. One (1) truck was unloading on the tipper and five (5) were waiting to unload. One (1) compactor and one (1) dozer were working here to push the garbage around toward the south face. The approach road to the working face was stable and passable. The second working face was in the new

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- Cell SE-1A, where the eight-foot (8') thick "fluff lift" of garbage above the liner is now being placed. Only Municipal Solid Waste (MSW) is allowed in the fluff lift. Local collection trucks were unloading conventionally here. Two (2) trucks were unloading and one (1) was waiting to unload. One (1) compactor was working here. Two (2) spotters were stationed here at the working face to check the loads being dumped and to remove any items that might damage the liner. I observed this work taking place during the inspection. I observed the piles of items that they had already removed – these included a toilet, and shopping cart, and tires (which wouldn't necessarily damage the liner, but which are not allowed to be disposed in the landfill under any circumstances). New wind screens were in place here.
8. Disposal in the Cell 4E-1 area had been occurring during the last inspection. Mr. Hallock stated that no more disposal is planned here for now. This area has been covered with soil and graded for stormwater flow.
 9. 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.
 10. Some flagging garbage was observed on the north face. Mr. Hallock stated that this area would be picked to remove what can be removed and dressed with additional fill to cover any flagging garbage that remains. No seeps were observed.
 11. I observed fill being placed on the top of the south face, west end. Mr. Hallock stated that this work, meant to dress up erosion and ensure adequate cover, will encompass the top two (2) benches and extend eastward to the east end of the top.
 12. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
 13. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
 14. As reported for the last inspection, the customer drop-off area (for small, non-commercial vehicles with garbage) has been moved to its new location in the Southeast Realignment area below Cell SE-1A. Recycling has now also been moved to this new location also. Two (2) dumpsters are placed here for garbage, and one (1) for recycling. The landfill identifies this area as "Zone 1" and has it marked with flags to aid customers in finding it.
 15. The north slope road was driven. No additional erosion since the last inspection was observed. The rock-lined drainage swale and rock check dams in front of the runoff points are still in good shape.
 16. We entered the scale house to observe trucking slips from Waste Connections' transfer stations. I was shown eight (8) slips for trucks from the Court Street transfer station. Of these, two (2) trucks were overweight. I was shown seven (7) slips for trucks from the 50th Street transfer station. Of these, one (1) was overweight.
 17. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:55 a.m. No landfill-related odors were observed. The landfill is now fully visible through the bare trees. The sight and sounds of trucks and equipment on the landfill was observed. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:26 a.m. No landfill-related odors were observed. The sight and sound of 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 11:39 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.

Ms. Leslie Huhn
Township Manager

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November 16, 2018

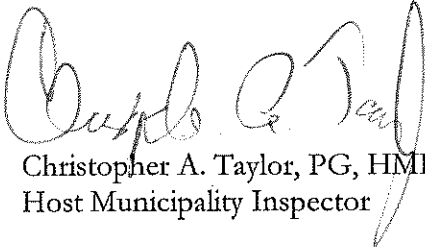
Activity Related to the Southeast Realignment Expansion

18. Newly constructed Cell SE-1A has received PA DEP certification and is now actively receiving garbage.

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

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