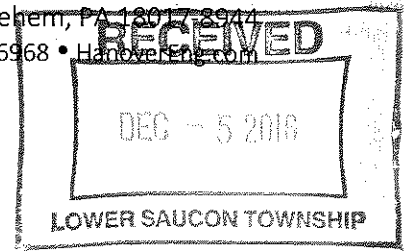


# Hanover Engineering

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December 2, 2016

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

RE: Inspection Conducted on December 1, 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. Priscilla deLeon, Township Council liaison.

SPECIAL NOTE: On the afternoon of Tuesday November 29, I conducted a drive-by inspection of Riverside Drive and Applebutter Road to assess conditions due to the heavy rain that had fallen that day. Along Riverside Drive, I observed that no water was flowing from the point where runoff from areas to the south (including the landfill) meets Riverside Drive. There was also no washout of sediment onto the road surface at this location, indicating that any water that had discharged here earlier in the day had been captured by the roadside swale and conveyed to the culvert passing under Riverside Drive. Several hundred feet east of here, a large amount of water was observed ponded over Riverside Drive in a low point. No washouts were observed on Applebutter Road in front of the landfill entrance driveway.

The following items were noted during the inspection on December 1, 2016:

- Mr. Rogers stated that the BRE plant was currently running at full capacity, after having been "up and down" Tuesday and Wednesday due to maintenance outages.
- The landfill flare was running at a flow rate of 1,000 scfm and a temperature of 1,648 degrees Fahrenheit. The largest blower was in operation. The bar graph on the instrument readout indicated that the flow rate was approximately thirty-eight percent (38%) of the Variable Frequency Drive (VFD) capacity. The paper chart record was new and provided no history.
- The truck wash was in use due to wet 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 upon approach to and arrival at the landfill. Upon leaving the facility, a slight gas odor was observed. Mr. Rogers stated that Applebutter Road was cleaned with a street sweeper last Friday as part of the ongoing program to clean the road every two (2) weeks.

**S**  
ROUTING

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

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5. Neither the northern or southern mister lines were running during the inspection. Mr. Rogers stated that both have now been taken offline for winterization. Mr. Rogers stated that IESI plans to spray neutralizer on the working face when filling Cell 4E-4 to control odors.
6. Wind during the inspection was from the west at an estimated ten to twenty miles per hour (10 – 20 mph).
7. Garbage was being disposed of at the Cell 4E Stage 3/Cell 4D boundary. Trucks are still approaching and departing the working face from the top of the landfill. Windscreens were in place at the working face. No odors were observed in the area of the LSA water tower.
8. Mr. Rogers stated that certification of the construction of new Cell 4E Stage 4 has been received from the Pennsylvania Department of Environmental Protection. Filling of that cell will start when the logistics of doing so are worked out (access roads to it must be established, and several gas wells must be relocated according to Mr. Rogers).
9. Cover soil is still being imported. No Alternative Daily Cover material is being used. Stockpiling at the top of the slope on the eastern end of the landfill has resumed. Mr. Rogers previously stated that this stockpile will be re-stabilized (mulched) as appropriate.
10. The tall weeds on the landfill are still being mowed to provide better access for maintenance and inspections and to improve the appearance of the facility.
11. Mr. Rogers stated that the maintenance work on LMC-6, 7, and 8 is complete. He stated that flows in both the leachate collection zones and detection zones, as measured in the chambers, has increased since this work was completed. In response to this, he stated that LMC-10 has now also been cleaned out.
12. The north slope road was driven. Some work to clear vegetation along the road to improve access has continued, with much work remaining. The heavy rain on the previous two (2) days caused no washouts along the road.
13. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
14. The temporary cap on the southern face was observed. No inflation of the cap was evident.
15. Ms. Donna Louder, Township Council Member and Citizen Representative to the landfill committee, sent an email stating that she is able to see the landfill operation from her back yard and was able to see equipment headlights between 5:30 AM and 6:00 AM the morning of Tuesday, November 29. Mr. Hallock responded by email that landfill workers are just “clocking in” at a little before 6:00 AM. Mr. Rogers added to the discussion during the inspection, stating that by the time employees change into their work clothes, drive up to the work face, have their morning safety and job meeting, and warm up their equipment, it is closer to 6:30 AM before any equipment activity takes place. He noted that their permit allows for support work to start at 6:00 AM, while garbage acceptance doesn’t start until 7:00 AM. He also stated that the workers use a generator with “headlights” on it to light the working face when it is still dark, and wondered if that is what Ms. Louder was seeing. I asked Mr. Rogers to make sure all work was complying with the hours stipulated in the permit.
16. I conducted a driving patrol along Skyline Drive before the inspection, starting at 10:15 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 10:10 AM. No landfill-related odors were observed. No sounds from the landfill flare were observed. No truck traffic was present on the landfill at that time, so no truck noise was observed. I conducted a driving patrol through Steel City and the Narrows before the

Ms. Leslie Huhn  
Township Manager

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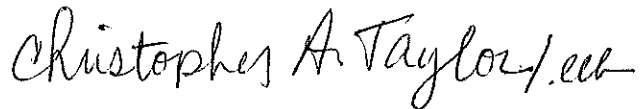
December 2, 2016

inspection, starting at 9:45 AM. No landfill-related odors or sounds were observed. There was still no washout of sediment observed on Riverside Drive at the discharge point in response to Wednesday's heavy rains. A smaller amount of water was still ponded in the low point of Riverside Drive beyond the discharge point.

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 black ink.

Christopher A. Taylor, PG, HMI  
Host Municipality Inspector

cat: llb

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