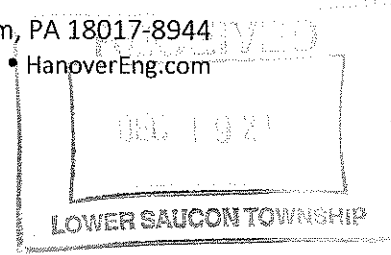


# HanoverEngineering

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December 15, 2016

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

RE: Inspection Conducted on December 15, 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, Mr. Mike Shelden, Operations Manager, Mr. Kevin Bodner, Engineer with Martin and Martin, Ms. Priscilla deLeon, Township Council liaison, and Ms. Donna Louder, Township Citizen representative. The following items were noted during the inspection:

1. Mr. Rogers stated that the BRE plant was currently running at full capacity, and has been drawing between 2,400 and 2,600 scfm lately.
2. The landfill flare was running at a flow rate of 880 scfm and a temperature of 1,665 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 went back to December 9 and indicated no flare shutdowns. Mr. Rogers stated that there were no flare shutdowns during the entire month of November.
3. The truck wash was not in use due to frozen 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. There was some sediment on Applebutter Road, but a street sweeper vehicle was observed cleaning the roadway.
5. Both the northern and southern mister lines remain offline and winterized.
6. Wind during the inspection was from the northwest/west at an estimated twenty to thirty miles per hour (20 - 30 mph).
7. Garbage was being disposed of at the Cell 4E Stage 3/Cell 4D boundary. Four (4) 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. No odors were observed in the area of the LSA water tower.
8. New Cell 4E Stage 4 has received the first lift of garbage, the "fluff layer". Mr. Shelden stated that a spotter was stationed at the working face during the disposal of the fluff layer, and that this practice will be continued anytime disposal is in a fluff layer zone of this cell. This will occur with each lift, since the cell wall is sloped. No garbage was being disposed of

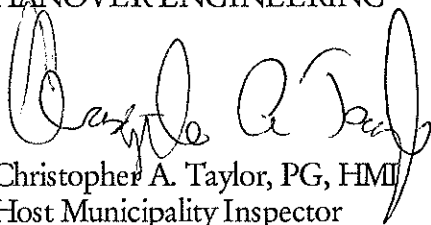
- S*
- ROUTING
- Council
  - Manager
  - Asst. Mgr.
  - Zoning
  - Finance
  - Police
  - P. Works
  - P/C
  - P & R
  - EAC
  - Engineer
  - Solicitor
  - Planner
  - Landfill
  - EMC
  - Other *WB*

- in this cell during the inspection. A new access road is being constructed to this cell from the top of the western face to provide for one-way traffic flow of trucks.
9. The installation of a new horizontal collector pipe to collect landfill gas from wells was observed. Mr. Rogers stated that he hopes to be done with the gas-related construction by the end of the week. This includes the installation and connection of four (4) newly-drilled wells, the re-drilling of five (5) existing wells, and the installation of the horizontal collector.
  10. Mr. Rogers stated that SCS, the landfill's air quality consultant, conducted Surface Emission Monitoring recently and recorded seventeen (17) locations where methane exceeded five hundred parts per million (ppm). These areas were remediated. Four (4) of them failed the ten (10) day recheck. These four (4) were again remediated, and passed a second ten (10) day recheck. The thirty (30) day recheck is pending.
  11. 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 is continuing. Trucks were observed dumping soil material on the eastern stockpile during the inspection. Mr. Rogers previously stated that this stockpile will be re-stabilized (mulched) as appropriate.
  12. The tall weeds on the landfill have been mowed to provide better access for maintenance and inspections and to improve the appearance of the facility.
  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. Louder repeated that she is able to see the landfill operation from her back yard and was has again seen equipment headlights and work lights before 6:00 AM since the last meeting. Mr. Sheldon stated that he would speak with landfill personnel to make sure all work practices were complying with the hours stipulated in the permit.
  16. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:45 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 along Skyline Drive before the inspection, starting at 9:55 AM. No landfill-related odors or sounds were observed. I conducted a driving patrol through Steel City and the Narrows before the inspection, starting at 10:00 AM. No landfill-related odors or sounds were observed.

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