

Hanover Engineering

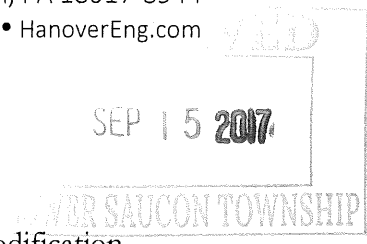
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September 13, 2017

SEP 15 2017

Ms. Leslie Huhn, Township Manager
Lower Saucon Township
3700 Old Philadelphia Pike
Bethlehem, PA 18015-5426

RE: IESI - Bethlehem Landfill
Review of DEP Issued Permit Modification
Major Permit Modification- Southeastern
Realignment/Expansion
Application No. 10020-A151
Hanover Project LS15-19



Dear Leslie:

The Township Technical Consultants for landfill activities have reviewed the approval issued by DEP on September 8, 2017 for the above-referenced Major Permit Modification and the associated DEP Conditions, Comments and Responses. We have the following comments:

- Condition 10 lists the Host Fees of \$4.84 per ton for MSW and \$7.01 per ton for RW. IESI should confirm to the Township that this amount is a DEP requirement, but that they recognize and agree to pay the higher Host Fee as described in the Township's Host Municipal Agreement (HMA) and amendments with all escalation requirements and expansion related landfill operations. The Township should review the HMA and amendment to be sure that the HMA fee requirement applies to the entire landfill, including any area of expansion (i.e. the new six [6] acres of waste disposal).
- Condition 12 is a condition based on a Township comment that IESI had not considered all the impacts on operation that will be caused by the transportation of construction materials and cover. IESI has been given 90 days to update various permit supporting documents.
- Response 7 states that "no old waste will be excavated." This response only pertains to the unlined area of the old landfill. It is noted that Response 12 describes that approximately 315,000 cy of waste will be exhumed from the western portion of the site and transported and redispersed in the eastern portion of the site.

The Township had expressed concern that the Permit be issued with specific conditions that application documents be integral with the Operations Plan or Nuisance Minimization and Control Plan so they would be enforceable. The comment/response portion of the permit provides DEP's opinion that all the commitments of IESI described in the many application documents will be honored and that DEP will enforce all of IESI's commitments. (Response 20)

If no other DEP conditions are imposed or permit clarifications issued, it is recommended that the general public and Host Municipal Inspector remain diligent in reporting any concerns or problems

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Ms. Leslie Huhn
Township Manager

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as soon as they are noticed, so that Township Council can request action of DEP when impacts occur or progress is not occurring as described in any of the IESI application documents and plans.

Please let me know if you have any questions on this review.

Respectfully,

HANOVER ENGINEERING

A handwritten signature in black ink, appearing to read 'JB Birdsall', with a stylized flourish at the end.

James B. Birdsall, PE
For the Township Engineer

jbb:llb

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