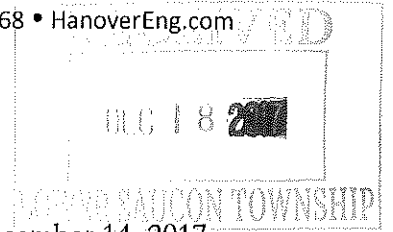


# Hanover Engineering

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

Phone: 610.691.5644 • Fax: 610.691.6968 • HanoverEng.com

December 15, 2017



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

RE: Inspection Conducted on December 14, 2017  
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 Nick Rogers, Environmental Compliance Manager, and Cody White, newly hired as landfill gas technician. The following items were noted during the inspection:

1. The BRE plant was not running. Mr. Rogers stated that they have been shut down for maintenance since about 9:00 a.m. today.
2. The landfill flare was also not running. The instrument readout indicated that the flare went off-line at approximately 9:00 a.m. today, corresponding with the BRE outage. Mr. Rogers theorized that the flare was knocked off-line when BRE went off-line. He attempted to restart the flare, but was unable to. Upon further investigation, he found that a worker had removed the "igniter hose" to replace it. A landfill gas smell was observed in the vicinity of the flare. Mr. Rogers stated that this was probably from gas trapped in the sump.  
UPDATE: At the meeting following the inspection, Mr. Rogers stated that the flare was restarted before he left for the meeting. At the meeting, Mr. Bradley (of Exelon) stated that he expected BRE to be running at half capacity by later in the afternoon.
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 the office parking lot. It should be noted that many areas were snow-covered.
5. Wind during the inspection was calm to five (5) mph from the west. The weather was clearing from an early-morning snowfall that dropped several inches of snow.
6. Garbage was being disposed of at the top of the landfill, in Cell 4B. One (1) compactor and one (1) dozer were running at the working face. The truck tipper is still staged at the working face and was in use: one (1) truck was on the tipper and five (5) trucks were waiting to use it. One (1) truck was dumping conventionally and zero (0) were waiting to dump conventionally. Trucks are still approaching and departing the working face utilizing the newly constructed south face haul road. Portable wind screens were in place. Mr. Rogers stated that acceptance rates are running about 1,700 tons per day.
7. A landfill gas smell was observed near the maintenance building.

S

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

8. Cover soil is still being imported. No Alternative Daily Cover material is being used.
9. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
10. Mr. Rogers stated that the sixth and final exceedance location previously identified by PA DEP as requiring corrective action has been addressed. This involved running a horizontal collector pipe from the nearest part of the existing gas collection system to the exceedance location.
11. Mr. Rogers stated that a contractor was onsite to begin installation of the new horizontal gas collectors at the top of the landfill.
12. Mr. Rogers stated that the PA DEP conducted a joint inspection on December 1<sup>st</sup> between the Waste Management Program and the Air Quality Program. He stated that no issues were brought to his attention at the time of the inspection, but that he has not seen the report yet. He stated that Surface Emission Monitoring was conducted at thirty-one (31) locations, and that no exceedances were found.
13. Mr. Rogers stated that he has completed the upsizing of two (2) of the wellheads from two-inch (2") diameter to three-inch (3") diameter. They have not fully opened these wellheads yet, as adjustments must be made in small increments to keep the wellfield "balanced." However, Mr. Rogers stated that he has already observed an increase in gas flow of 100 scfm. He stated that he has ordered six (6) more of the larger wellheads, but that these must be fabricated, which will take some time. When he receives them, he will upsize an additional six (6) wells.
14. The customer drop-off area (for small, non-commercial vehicles with garbage) is still relocated to the southern access road. The recycling drop-off has still not been re-established on site.
15. Internal access roads and the haul road were wet from the snowfall and were not dusty.
16. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:50 a.m. No landfill-related odors were observed. The sound of tracked equipment on the landfill was observed to be audible. I conducted a driving patrol along Skyline Drive before the inspection, starting at 9:33 a.m. No landfill-related odors were observed. Truck traffic on the top of the landfill was observed to be audible and visible from the end of Skyline Drive. I conducted a driving patrol through Steel City after the inspection, starting at 11:05 a.m. No landfill-related odors were observed. No landfill-related sounds were observed at the entrance to the Hill Climb. The driving patrol along Riverside Drive did not reveal any landfill-related issues.

Activity Related to the Southeast Realignment Expansion

17. Construction of the west end of the MSE wall was taking place. Mr. Rogers stated that it was started last week. Structural fill is stockpiled on site and was being trucked to the wall site.
18. Stripping of cover soil in the area of new Cell SE-1 is ongoing. Mr. Rogers stated that soil thickness has been found to exceed the standard depth of three feet (3'), and has exceeded six feet (6') in places. He said that this is not a problem from a construction standpoint. Some soil cover is being left over the synthetic cap to protect it, until they are ready to expose the cap all at once.

Ms. Leslie Huhn  
Township Manager

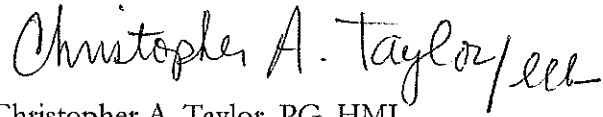
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December 15, 2017

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 cursive script.

Christopher A. Taylor, PG, HMI  
Host Municipality Inspector

cat:llb

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