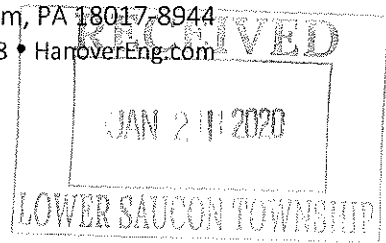


Hanover Engineering

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January 17, 2020

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

RE: Inspection Conducted on January 16, 2020
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 David Pannucci, Regional Engineer, and Astor Lawson, District Manager. The following items were noted during the inspection:

1. The BRE plant continues to be off line, with no activity observed. During the prior inspection, an alarm coming from the BRE site was audible at the landfill parking lot. The alarm was not sounding during the current inspection.
2. The landfill flare was running at a flow rate of 2,960 standard cubic feet per minute (scfm), a temperature of 1,631 degrees Fahrenheit, and fifty inches (50") of vacuum. The flow rate was reading as one hundred percent (100%) of the variable frequency drive. Cody White, Landfill Gas Technician, had previously explained that this reading indicates that the VFD is running at the maximum speed for which it is set. He stated that it does not indicate that the flare capacity is being maxed out. The largest blower was in operation. The flare appeared to be running normally with no visible emissions or flames observed during this inspection. Mr. Pannucci stated that there have been no visible emissions from the flare since the last inspection. The paper chart was new and provided no record. Mr. Pannucci stated that there was only one (1) brief shutdown during the last month.
3. The truck wash was open and observed in use.
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. Weather conditions were mostly sunny, temperature in the 40s, and wind from the northwest at ten to twenty (10 – 20) miles per hour with higher gusts. A street sweeper was observed cleaning internal roads. The customer convenience area was in use for small vehicles. One (1) picker was observe working along Applebutter Road upon my arrival. During the inspection he was directed to come inside and remove garbage inside the facility along with a second picker who was already doing so. Garbage was being disposed of at one (1) working face at the eastern end and southern side of Cell SE-1B. The approach to and departure from the working face was muddy but passable. Zero (0) trucks were unloading on the tipper, with zero (0) waiting for the tipper.

ROUTING

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One (1) truck was unloading conventionally, with zero (0) trucks waiting. One (1) dozer and one (1) compactor were working in the garbage. A tall berm had been formed along a portion of the south side of the cell to block garbage from being blown off the working face. Wind screens were in place at the working face on top of this berm. Much of the windblown litter was being caught by the screens. However, some litter was blowing between or around the screens. Mr. Lawson had operations shift two (2) of the screens based on the changing wind direction. The litter was blowing down the south face, where a lot of it was caught by the new catch fence installed at the toe of adjoining Cell SE-1A. Beyond this, pickers were working to remove litter. Mr. Lawson stated that he would assign more pickers to the removal effort. It was observed that soil cover was being spread by one (1) dozer on the east end of the working face to cover flagging garbage. A dump truck was observed hauling soil to this location.

10. No odors were observed at the top eastern end of the landfill.
11. The area of the south face has yet to be dressed with additional cover soil. This is awaiting suitable site conditions.
12. Mr. Pannucci stated that two (2) large areas of seeps were discovered toward the eastern end of the south face last week and were repaired. These may have been contributing to odor incidents.
13. Areas of erosion were observed at the top west end of the south face. Mr. Lawson stated that these would be repaired when site conditions permit.
14. The north slope road was driven. The rip-rap swale and rock check dams were in good shape with no erosion observed. Minor erosion was observed in the road bed.
15. The temporary cap on the south face was observed. No ballooning of the cap was occurring.
16. The west high wall was observed. No slope failures or major movement of soil or rock since the last inspection was evident.
17. Mr. Pannucci stated that Cody White, Landfill Gas Technician, read the gas wells yesterday. He stated that SCS, the landfill's consultant, has been asked to prepare the landfill's "gas plan" for 2020. This may involve designing and drilling new wells or other measures to maximize the efficiency of gas collection.
18. We entered the scale house to inspect trucking slips from Waste Connections' transfer stations. Three (3) out of fifteen (15) trucks were overweight, by 60 pounds, 560 pounds, and 1120 pounds.
19. I conducted a driving patrol along the intersection of Applebutter Road and Ringhoffer Road before the inspection, starting at 9:52 a.m. No landfill-related odors were observed. The sight and sound of garbage trucks and equipment working on the landfill were observed. The culvert under Applebutter Road was observed to be carrying the streamflow with no backups. I conducted a driving patrol along Skyline Drive after the inspection, starting at 11:22 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 11:32 a.m. No landfill-related odors or sounds were observed. On the driving patrol through the Narrows it was observed that the road immediately downslope of the runoff point from the landfill was clean. No landfill-related issues were observed.

Activity Related to the Southeast Realignment Expansion

20. No expansion construction work is taking place at this time.

Ms. Leslie Huhn
Township Manager

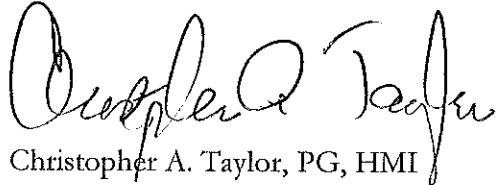
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January 17, 2020

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

A handwritten signature in black ink, appearing to read "Christopher A. Taylor". The signature is fluid and cursive, with the first name "Chris" and last name "Taylor" clearly visible.

Christopher A. Taylor, PG, HMI
Host Municipality Inspector

cat: llb

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