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May 22, 2020

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

RE: Bethlehem Landfill Company
Technical Consultant Committee Meeting Notes
For the May 19, 2020 Meeting
Hanover Project LS04-78

Dear Ms. Huhn:

We would like to provide you with our notes from the May 19, 2020 Technical Consultant Committee meeting. The meeting took place via a Zoom and began at 1:00 p.m. Attending the meeting were:

- Ms. Priscilla deLeon
- Mr. Tom Carocci
- Ms. Lauressa McNemar, PE
- Mr. Rich Sichler, PG
- Mr. Christopher Taylor, PG, HMI
- Mr. Scott Brown, HMI
- Ms. Leslie Huhn, Twp. Mngr.
- Ms. Diane Palik

MEETING NOTES

A. Committee

1. Review of Notes from Previous Meeting.

The notes from the February 18, 2020 meeting, as reported in the Hanover letter dated February 27, 2020, were reviewed and accepted without comment.

2. Review of Standard Report Calendar

Mr. Brown stated that he had reviewed the status of all standard reporting that Bethlehem Landfill Company (BL) is responsible to provide. He confirmed that all reporting had been received on time except for the Annual AIMS report which was received on May 11, 2020 (due March 31, 2020) and the Quarterly Facility Report (White Binder) was not received. BL reported to the Township that the report was

completed on time, but they had not delivered the Aims Report to the Township because they thought the Township offices were closed. The following was also discussed:

- Rich Sichler Reported that April's Leachate Demand and Demand/Abatement Well Report was received May 5, 2020.
- Scott Brown noted that paragraph (i) of the presentation outline should be corrected to read 1Q20 and not 4Q19.

B. CHRISTOPHER A. TAYLOR, PG, HMI – HOST MUNICIPALITY INSPECTOR

1. General Overview of Landfill Activities during the First Quarter of 2020 or other appropriate timeframe as reported by Scott Brown, HMI.

a. Waste Acceptance and Management

- Waste disposal took place in Cell SE-1B during the First Quarter.
- Waste acceptance tonnage for the Fourth Quarter reported in HESI meeting notes (Oct-Dec 2019) was 106,850 tons, versus 106,151 tons for the Third Quarter. Mr. Brown noted that these tonnages were not updated, and he would follow-up with revised tonnages for the First Quarter.
- No use of previously approved Alternative Daily Cover materials (paper sludge and Posi-Shell) has taken place yet.
- The Form U review process is still being followed.
- Supplemental Waste Tracking forms submitted by BL indicated that one (1) load of waste was rejected during the First Quarter.
- Recycling (newspaper, commingle, and scrap metal) continues to be received and processed at the landfill. A total of (?) Township residents brought recycling to the landfill in the First Quarter. Mr. Brown reported that twenty-four (24) was the number of residents during the Fourth Quarter 2019 and he will follow up with the current number for the First Quarter 2020.
- Residual Waste Reports are now being provided to the Township. The First Quarter Report has been received and indicated a total residual waste tonnage of 6,079.08 tons.
- The Host Municipality Benefit Fee Report and fee check for the First Quarter have been received by the Township.
- The Pennsylvania Department of Environmental Protection (PA DEP) Waste Management Program conducted one (1) inspection during the First Quarter, on January 9, 2020. As noted below during the February TCC meeting in this Report.

- **RECENT DEVELOPMENT:** PA DEP conducted an inspection on January 9, 2020 which documented noncompliance conditions. Additionally, the violations documented on October 18, 2019 were deemed resolved as of this January inspection. Ms. McNemar reported that the First Quarter 2020 waste tonnages were 150 tons less than the previous quarter. Also, out of state waste accepted at BL went from 56% to 70% in the First Quarter, possibly as a result of the virus shutdown?

The Committee had **no** concerns related to this topic to report to council.

b. Landfill Gas Management

- The BRE plant has remained off-line during the First Quarter to date.
- The landfill flare was online and burning landfill gas solely during the First Quarter and to the present time.
- BL has one hundred four (104) vertical gas wells and thirty-four (34) horizontal wells (collectors) in operation as of the end of the First Quarter.
- BL provided a copy of the odor complaint log from PA DEP which indicated that twelve (12) odor complaints were reported to PA DEP during the First Quarter.
- The gas royalty payment for the Fourth Quarter 2019 has been received by the Township.
- The temporary cap on the south face was observed during the Fourth Quarter to check for landfill gas accumulating under this cap, which had caused it to “balloon up” previously. Ballooning of the temporary cap was not observed during the First Quarter or during subsequent HMI inspections.
- Aria Energy East, LLC is proposing to construct a Renewable Natural Gas (RNG) Facility on the landfill property and BL is proceeding through the Minor Permit Modification Process. Ms. McNemar said that Aria and BL are applying for several permits or permit modifications to construct the RNG facility and both Aria and BL have been responding to PA DEP’s requests for clarification or additional information of the various applications.
- The PA DEP Air Quality Program did not conduct any inspections during the First Quarter, or since, that this office has received documentation of.

- The Committee as a whole voiced a concern over the lack of PA DEP inspections, particularly when odor complaints continue to be reported by the residents. Ms. deLeon noted that in December 2019 the Township sent a letter to PA DEP with their concerns that the odor complaints are continuing as documented by the Township and PA DEP logs.
- Ms. McNemar reported that on April 29, 2020, BL received an NOV as a result of not placing final cover within one (1) year of completion of the final lift and is now required to place final capping of thirty-four (34) acres by the end of 2022.
- The Committee recommend reporting to Council that odor complaints continue to be received from the residents through PA DEP and directly to the Township.

c. Leachate Management

- Secondary leachate flows in LMC-6 varied between 0 and 11 g/a/d during the First Quarter.
- Secondary leachate flows in LMC-7 were recorded as 0 g/a/d for all weeks during the First Quarter.
- Secondary leachate flows in LMC-8 varied between 0 and 973 g/a/d and exceeded 100 g/a/d for 10 of 13 weeks during the First Quarter.
- Secondary flows in PS-1, PS-2, PS-3, and PS-4 were between 0 and 7 g/a/d

The Committee had no concerns but recommends continuing to monitor the flows and that Mr. Brown discuss with BL the high leachate flow in the primary collection system for LMC-7 that have been occurring since February.

d. Groundwater Management

- The 1Q20 groundwater sampling event was completed February 24, 2020 to February 26, 2020.
- The 2019 Annual Review of Groundwater Monitoring System including Trend Analysis is due prior to June 30, 2020, as required.
- The Groundwater Abatement System continued to function, with pumpage amounts reported monthly.
- Abatement well maintenance issues are now included in the monthly reports, as requested.
- Mr. Sichler advised that the committee has **no** concerns and noted that abatement well AB-1 was offline-replaced with AB-1R.

The Committee had **no** concerns on this topic report to council.

e. Traffic Management

	<u>January</u>	<u>February</u>	<u>March</u>
Total Trucks	2,859	2,276	2,555
Overweight	72	73	76
Warnings	60	61	71
Suspensions	12	12	5

BL issued a Daily Operation Record of overweight vehicles, detailing vehicle and hauling company information, for the months of February and March (January Report was missing). The records indicate that for the First Quarter, three (3) trucks were more than 2,000 pounds over the 80,000-pound weight limit and nine (9) trucks were more than 2,000 pounds over the 73,280-pound weight limit.

The Committee discussed the potential damage to the public roads and safety to the Public that could result from the overweight vehicles. The Committee did note that BL is doing what they can through warnings and suspensions of the drivers, but BL cannot turn those vehicles away once they reach the landfill facility due to the safety concerns. There was a brief discussion about the “trashnet” program and the last time anyone recalled its presence which was a long time ago.

The Committee had **no** new concerns to recommend reporting to Council.

f. Stormwater Management

- Work on the main gabion down channel on the south face, which collects stormwater runoff from the benches and carries it down to Basin 4, remained suspended during the Fourth Quarter pending available work crews. Some minor work to dress up the connections between the benches and the portion of the down channel already completed was conducted.
- The culvert under Applebutter Road, which carries an unnamed tributary to the East Branch Saucon Creek, continued to flow freely.
- No washouts from the landfill on Applebutter Road or the Narrows during the First Quarter were reported to this office.

The Committee had **no** concerns to recommend to Council.

g. Status of Permit Applications to DEP

- Applications have been filed on behalf of Aria Energy East, LLC for a Renewable Natural Gas processing facility to be constructed on the landfill property.
- Ms. McNemar explained that several DEP Permits and Permit Modifications are required to be obtained by both Aria and BL for the Renewable Natural Gas Processing Facility to be constructed and that both companies are responding to DEP's technical deficiency letters as required by DEP. Ms. McNemar will continue to monitor the permitting process.

The Committee had **no** concerns to recommend reporting to Council.

h. Operation Changes

- No significant changes during the First Quarter.
- No noise complaints have been reported in a long time.
- Ms. McNemar commented that the final cover capping that is required as discussed earlier in the meeting may generate some noise complaints due to the construction activity which will be occurring at the top or near the top of the landfill.

The Committee had **no** concerns to recommend reporting Council.

i. Regulatory Oversight

- The PA DEP Waste Management Program conducted an inspection on January 9, 2020. PA DEP Air Quality Program did not conduct any other inspections during the First Quarter. On January 9, 2020, the inspection found that the two (2) violations noted during their October 18, 2019 inspection were addressed.
- The Committee did have some concerns regarding the lack of inspections performed by PA DEP's Air Quality and Waste Management Departments. There was speculation that the virus shutdown may have something to do with the reduced inspections.

The Committee had **no** concerns to recommend reporting to Council.

j. Miscellaneous

- Update on condition of west high wall: no major slope failures, and no obvious movement of soil or rock, were observed during the First Quarter, or since.
- Construction of the MSE wall along the Southern end of proposed cells SE-1A and B has started. The first lift was placed in the beginning of May.

The Committee had **no** concerns to recommend reporting to Council.

k. Review of Inspection Reports

- PA DEP Waste Management Program (WMP) Inspection Reports

PA DEP conducted inspections as follows:

January – Zero (0) violations reported and two (2) October violations were addressed.

February – No inspection reported.

March – No inspection reported

- PA DEP Air Quality Program Inspection Reports

PA DEP conducted inspections as follows:

January – No inspection reported.

February – No inspection reported.

March – No inspection reported

- PA DEP Engineer's Monthly Status Reports

PA DEP conducted meetings at the landfill and prepared Status Reports as follows:

January – Report February 24, 2020. No issues reported.

February – No report.

March – No report.

l. HMI Inspections

HEA conducted inspections during the First Quarter on the following dates:

01/02/20
01/16/20
02/06/20
02/24/20
03/05/20

Results are as previously reported.

m. Review of Citizen Complaint Log Maintained by PA DEP

JAN: eleven (11) odor complaints reported.
FEB: one (1) odor complaint reported.
MAR: three (3) odor complaints reported.

C. Rich Sichler, PG, Township Hydrogeologist

All of Mr. Sichler's reporting is detailed above.

D. Laressa McNemar, PE, Special Landfill Consulting Engineer

Laressa McNemar's reporting is detailed above.

E. Summary of Concerns:

The following concerns have been detailed in the report above:

- Landfill Gas Management: Continued odor incidents documented via complaints lodged with PA DEP.
- Leachate Management: No immediate concerns but requested that Mr. Brown follow up on high flow readings in LMC-7 primary system.

F. Meeting Schedule:

The remaining 2020 meeting dates for the Township Consultant Committee have been scheduled as follows:

- August 18, 2020
- November 17, 2020

If you have any questions or comments on this report, please do not hesitate to contact me.

Respectfully,

HANOVER ENGINEERING

Scott J. Brown, HMI
Host Municipality Inspector

sjb:jle