

**WESTMORELAND SANITARY LANDFILL, LLC**  
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**ENVIRONMENTAL AUDIT OUTLINE**

Civil & Environmental Consultants, Inc. (CEC) will perform a review of the Westmoreland Sanitary Landfill (WSL) environmental permits, monitoring and inspection records, reporting records, and other compliance related items. CEC will also conduct interviews with WSL's environmental manager, senior management, and facility personnel with environmental responsibilities. CEC will enlist the appropriate subject matter experts to assess the documents listed below and perform site visits and interviews. The documents to be reviewed include, but are not limited to, the following:

- Municipal Solid Waste (MSW) Permit No. 100277:
  - Form 1 – Facility Plan;
  - Form 14 – Operation Plan;
  - Form 18 – Water Quality Monitoring System;
  - Form 25 – Leachate Management;
  - Form I – Soil Erosion and Sedimentation Controls;
  - Form K – Gas Management;
  - Form L – Contingency Plan for Emergency Procedures;
  - Form R – Waste Analysis and Classification Plan; and
  - Form X – Radiation Protection Plan.
- National Pollutant Discharge Elimination System (NPDES) Permit No. PAR506110;
- Title V Operating Permit No. TV-65-00767:
  - Applicable parts for active sources under the current Title V Permit;
  - Plan Approval 65-767B;
  - Plan Approval 65-767C, as applicable;
  - 40 CFR Part 62 Subpart OOO, 40 CFR Part 63 Subpart AAAA, 40 CFR Part 60 Subpart Cc, 40 CFR Part 60 Subpart Cf, 40 CFR Part 60 Subpart A, 40 CFR Part 61 Subpart A, 40 CFR Part 63 Subpart ZZZZ, 40 CFR Part 60 Subpart JJJJ, 40 CFR Part 61 Subpart M; and
  - Landfill Gas Treatment Plant:
    - Evaluation of the Thermal Oxidizer operation as per the bullet points identified in the May 2, 2018 Request for Determination cover letter and for consistency with the manufacturer's specifications and good operating practices; and
    - Evaluation of the Landfill Gas Treatment Plant for compliance with applicable federal regulations.
- Monitoring and Reporting Records:
  - Operational;
  - Leachate;
  - Landfill gas;
  - Groundwater;
  - Surface water; and
  - Air.

- WSL Inspection Records;
- Regulatory Inspection Records;
- Notices of Violation, Consent Orders/Decrees, Administrative Orders;
- February 2021 Erosion Control Improvements Plan;
- October 2022 Leachate Corrective Action Plan;
- Spill Prevention, Control, and Countermeasure (SPCC) Plan;
- Preparedness, Prevention, and Contingency (PPC) Plan; and
- Stormwater Pollution Prevention Plan (SWPPP).

In accordance with the November 1, 2023 Consent Order and Agreement (COA), the environmental audit will also include an assessment of the items identified in Section 8.a. of the COA. CEC will also prepare interim and final audit reports, including identified issues, deficiencies, and non-compliance items, as well as recommendations for addressing or correcting the identified items.