



September 12, 2024

Ms. Lauren Fike
Pennsylvania Department of Environmental Protection
Compliance Specialist
Bureau of Waste Management
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745

Dear Ms. Fike:

Subject: Audit Report Response to Comments
 Westmoreland Sanitary Landfill, LLC
 Westmoreland Sanitary Landfill
 Rostraver Township, Westmoreland County, Pennsylvania
 Permit No. 100277 / Enforcement ID No. 421388
 CEC Project 334-863

On behalf of Westmoreland Sanitary Landfill, LLC (WSL), Civil & Environmental Consultants, Inc. (CEC) submits one (1) electronic copy of this Response to Comments for the Westmoreland Sanitary Landfill Interim and Final Audit Reports. This submittal is being made in response to the Pennsylvania Department of Environmental Protection (DEP) letter dated August 28, 2024. The DEP's comments from the August 28, 2024 letter are provided below verbatim in bold type, followed by WSL's response.

- 1. The Interim and Final Audit Reports only mention the findings from areas where Civil & Environmental Consultants, Inc., (CEC) made recommendations. The report does not contain any information regarding review of areas or regulations where recommendations were not made.**

RESPONSE: The intent of the Interim and Final Audit Reports was to identify deficiencies and provide recommendations for improvement. CEC reviewed each item listed in the Environmental Audit Outline. The list of items reviewed was also presented in Section 1.2 of the Interim and Final Audit Reports. If no deficiencies were identified for a particular item, CEC's conclusion for the item was that WSL was operating in compliance with the applicable requirements/regulations.

- 2. Plan Approval C was not audited, as required per the March 22, 2024, approved audit outline. It is requested that CEC conduct an audit of Plan Approval C.**

RESPONSE: Plan Approval Permit 65-00767C was reviewed as part of the environmental audit. However, the plan approval is for the leachate evaporation system, which has not been

Ms. Lauren Fike
CEC Project 334-863
Page 2
September 12, 2024

installed at the facility. Therefore, there are no records or compliance items available for review for Plan Approval Permit 65-00767C.

- 3. It is unclear if applicable federal subparts (not found in the Title V Permit) were audited. A statement is requested from CEC regarding whether these new/revised applicable subparts were part of the Interim or Final Audit.**

RESPONSE: The applicable federal regulations were included in the Environmental Audit Outline and Section 1.2 of the Interim and Final Audit Reports. These regulations were evaluated as part of the WSL audit.

We trust this submittal is sufficient for your needs at this time. If you have any questions or require additional information, please contact CEC at (724) 327-5200, or via email at jhamill@cecinc.com.

Very truly yours,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Jill R. Hamill, P.E.
Project Manager



David J. Larson
Principal

JRH:DJL/jg

cc: Brian Stewart, P.E.
Michael Zucatti, P.E.

L-334863.S12/P