



December 30, 2020

VIA ELECTRONIC DELIVERY

Rich Walton.
Westmoreland Sanitary Landfill, LLC
111 Connor Lane
Belle Vernon, PA 15012-4519

Re: Form 14-Operation Plan
Westmoreland Sanitary Landfill
Rostraver Township
Westmoreland County
I.D. No. 100277

Dear Mr. Walton:

The Department of Environmental Protection (the Department) has reviewed the revised Form 14 submitted by Westmoreland Sanitary Landfill, LLC (WSL) on November 6, 2020 pursuant to Paragraph 3.h of the October 7, 2020 Consent Order and Agreement (COA) between WSL and the Department. Based on that review, the Department has identified the following technical deficiencies with respect to that submission:

1. Attachment 14-2 presents samples of the Daily Activity and Weekly Inspection Reports to be completed in accordance with the November 6, 2020 Corrective Action Plan. The Operation Plan narrative in Attachment 14-1, however, does not include any reference to those forms or specify an obligation for their completion. Please revise Attachment 14-1 to state that daily and weekly site inspections shall be conducted and be documented using the sample forms contained in Attachment 14-2, and that necessary and appropriate corrective actions shall be implemented based on the conditions observed and documented on those forms. The narrative should further state that copies of the completed Daily Activity and Weekly Inspection Reports shall be retained onsite as a component of the daily operational records required by 25 Pa. Code Section 273.331.
2. Section C.1 of Form 14 requires that the Operation Plan describe the proposed landfill method and procedures that are to be established and followed for the life of the site. The response provided in Attachment 14-1 states only that operation of the facility will employ the "traditional area fill method" of disposal. The narrative should include a general description of the procedures that that method entails.
3. 25 Pa. Code Section 273.132(1) requires that the Operation Plan narrative describe the major equipment necessary to be used for operation of the facility pursuant to 25 Pa. Code Section 273.215. The revised Attachment 14-1 does not appear to address this requirement. The equipment list and description presented in the currently permitted Form 14 for the facility should be included in the revised Attachment 14-1.
4. Section G.2 of Attachment 14-1 does not include provisions for use of vehicle tare weights for waste measurement purposes as is currently practiced at the facility. Section G.2 should be revised to discuss the use of tare weights, including a plan for how they are maintained or re-tared.
5. Clarification is needed with respect to the information regarding access roads presented in Section J of Attachment 14-1 relative to the requirements of 25 Pa. Code Section 273.213. 25 Pa. Code Section 273.213(d) limits the maximum sustained grade of access roads to not greater than 12%. Section J.4 in

Attachment 14-1 states that the permanent access roads will not exceed an average grade of 12%. The requirement in Section J.4 should be revised to be consistent with the language of the regulation.

6. Section K in the currently permitted Attachment 14-1 includes provisions for establishment and use of staging areas for waste hauling vehicles and containers and specifies procedures for their utilization. The revised Section K also contains such provisions but does not include the "Staging Area Control Plan" adopted in the permitted version. The "Staging Area Control Plan" of the permitted Form 14 should be included in the Section K of the revised Form 14.
7. Additional information should be provided regarding the facility's truck wheel wash that is referenced in Section L. of Attachment 14-1 as a countermeasure for dust suppression. Specifically, the plan should identify contingency measures to be taken to ensure that mud is removed from trucks during times when use of the wheel wash is interrupted for sediment removal or equipment repair. Further, the references made in Section L to a Nuisance Odor Control Plan in Attachment 14-5 should be to the Nuisance Odor Minimization Plan that is contained in Attachment 14-4.
8. Section N in both the currently permitted Attachment 14-1 and in the proposed revisions to Attachment 14-1 states that: "Salvaging of materials will not be allowed or conducted unless salvaging is controlled by the operator prevent interference with prompt and sanitary operations." The revised Section N, however, does not include the procedures adopted in the current version to be employed if and when salvaging is conducted. The salvaging procedures of the permitted Form 14 should be included in the Section N of the revised Form 14.

A revised Form 14 resolving the concerns identified above should be submitted within thirty (30) days of receipt of this letter. If you have any questions, please contact me at 412.442.5800 or dstrittmat@pa.gov.

Sincerely,

Denis O Strittmatter

Gregory W. Holesh

Denis O. Strittmatter
Permit Reviewer
Bureau of Waste Management

Gregory W. Holesh, PE
Environmental Engineering Manager
Bureau of Waste Management

cc: Civil Design Solutions
Regional
Chron