



Pennsylvania  
**Department of  
Environmental Protection**

March 27, 2025

**ELECTRONIC DELIVERY TO: ASULKOWSKI@NOBLEENVIRO.COM**

Alex Sulkowski  
Westmoreland Sanitary Landfill, LLC  
111 Conner Lane  
Belle Vernon, PA 15012-4519

Re: Technical Deficiency Letter – Alternative Daily Covers Minor Modification  
Westmoreland Sanitary Landfill  
Rostraver Township, Westmoreland County  
Permit I.D. No. 100277  
Authorization No. 1499894

Dear Alex Sulkowski:

The Department of Environmental Protection (Department) has completed the technical review of the above-referenced application, which was received on September 13, 2024. The following technical deficiencies have been identified according to applicable laws and regulations, and the guidance sets forth the Department's preferred means of satisfying the applicable regulatory requirements. The required actions below must be taken timely in order for the Department to approve the application.

#### **Technical Deficiencies**

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1. According to 25 Pa. Code Section 271.231(a), the request to authorize an alternative to design requirements is submitted through Form Q only if specific sections in regulation expressly state that alternative daily covers (ADCs) may be authorized under Section 271.231. Since Section 273.232 (relating to daily cover) does not expressly state that alternatives may be authorized under Section 271.231, the ADCs authorization request should be submitted as a modification to Form 14 (Operation Plan – Phase II).

**Please submit a revised Form 14 incorporating relevant site-specific provisions for each ADC material proposed. The revised Form 14 should incorporate site-specific considerations for each ADC material such as material specifications and description, handling procedures, placement of the material, and a quality assurance plan.**

2. Pursuant to 25 Pa. Code Section 273.232(b)(5), the daily cover shall be consistent with the waste acceptance plan for the facility.

**For *each* ADC material proposed, please provide a copy of the section of the approved waste acceptance plan or a copy of a permit condition which confirms that the facility is authorized to accept the waste material.**

3. The potentials for odors and decomposition-related issues associated with the Soil/Compost Mixture, industrial sludges, dredged materials, auto fluff, and construction and demolition wastes have not been addressed. These materials are known to emit odors or attract pests.

**Please provide more information regarding the planned mitigation measures to address odors emitted from these materials during stockpiling and application as ADC.**

**A revised page 2 of Form A (Application for Municipal or Residual Waste Permit) must be re-signed by the applicant, notarized, and marked with the revision date. Updated Forms B and B1 should also be submitted.**

Your response should be in the form of revisions to affected pages, forms, or drawings in the application. Each revision or addition should bear the revision date and show what items have been revised or added. The Department suggests you use colored backgrounds for the revised pages, with additions highlighted and deletions lined out, so changes are easily identified. All revised forms must have the title sheet marked with the latest revision date.

The requested information should be submitted within 60 days of receipt of this letter.

Please submit your response using the *Public Upload with Electronic Payment* tool on the Department's website. A link to the submission form can be found here:

<https://www.pa.gov/agencies/dep/data-and-tools/electronic-submissions.html> .

Please note in the Submission Notes section that this submittal is in response to a Technical Deficiency Letter for Permit I.D. No. 100277 and Authorization No. 1499894.

Upon receipt of your submission, the Department will continue its evaluation of the application. You will be notified later if deficiencies remain in your application and given an opportunity to correct any deficiencies. A pre-denial letter will summarize these proceedings.

You may follow your application through the review process via *eFACTS on the Web* at:

<https://www.ahs.dep.pa.gov/eFACTSWeb/default.aspx/default.aspx> .

If you believe the listed deficiencies are not significant, you may ask the Department to review the information you have already submitted. If you choose this option, you should explain and

justify how your current submission satisfies the deficiencies noted above. If you fail to respond to this request within 60 days, your application may be denied.

If you have any questions about your application or requirements of the Solid Waste Management Act, or if you would like to schedule a meeting to discuss the stated deficiencies, please contact me at iabulfata@pa.gov or 412.442.5204 and refer to Permit I.D. No. 100277 and Authorization No. 1499894.

Sincerely,

Ihab Abdulfatah, P.E.  
Environmental Engineer  
Bureau of Waste Management

Bill Gaspari, P.E.  
Environmental Engineering Manager  
Bureau of Waste Management

cc: Tamira Spedaliere, Rostraver Township (planning@rostraver.us)  
Jason Rigone, Westmoreland County (wcplanning@co.westmoreland.pa.us)  
Patrick Wozinski, BAI Group LLC (pwozinski@baigroupllc.com)  
Region