

October 26, 2020



Ms. Sharon Svitek
Pennsylvania Department of Environmental Protection
Southwest Regional Office
Waste Management Program
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745

Subject: Westmoreland Sanitary Landfill, LLC – Sanitary Landfill
Consent Order and Agreement Executed February 13, 2020
Quarterly Progress Report – Q2 2020
Rostraver Township, Westmoreland County, Pennsylvania.
PADEP Permit No. 100277
Design Solutions Project 2020-040

Civil Design Solutions, Inc. (Design Solutions) is pleased to provide this Quarterly Progress Report (Progress Report) on behalf of the Westmoreland Sanitary Landfill, LLC. – Sanitary Landfill facility located in Rostraver Township, Westmoreland County, Pennsylvania. This Progress Report is being provided in accordance with Corrective Action Paragraph 19 of the Consent Order and Agreement executed on February 13, 2020.

If you have any questions concerning this Progress Report, please do not hesitate to contact Mr. Rich Walton of Sanitary Landfill at (610) 698-9291 or our office at (412) 299-2700.

Sincerely,
Civil Design Solutions, Inc.

A handwritten signature in black ink, appearing to read "MEZ".

Michael E. Zucatti, P.E.
Assistant Project Manager, Ext. 157

A handwritten signature in blue ink, appearing to read "DM".

David W. Murray, P.E.
Principal Engineer, Ext. 151

cc: Mr. Rich Walton, Westmoreland Sanitary Landfill – 1 Copy (electronic)
Mr. Brian Stewart, Westmoreland Sanitary Landfill – 1 Copy (electronic)

This Quarterly Progress Report (Progress Report) has been prepared for the Westmoreland Sanitary Landfill facility (Sanitary Landfill) as required by Corrective Action Paragraph 19 of the Consent Order and Agreement (COA) executed February 14, 2020. The following sections present a description of actions to achieve compliance with the COA, activities planned for the next calendar quarter, applicable material problems or delays, leachate disposal and a summary of any marketing correspondence with alternative appropriately permitted disposal facilities.

Compliance Actions

WSL received a First Technical Comment Letter on April 14, 2020 from the PADEP regarding the Leachate Minor Permit Modification (Permit Modification #1) submitted on February 19, 2020. A complete response to the comments was prepared and submitted to the PADEP on June 10, 2020.

Next Quarter Planned Activities (Q3 2020)

During the next calendar quarter, WSL intends to continue to market appropriately permitted leachate disposal facilities. Prior to initiating disposal at any new facility, WSL will request written approval from the PADEP in accordance with Correction Action Paragraph 5. Additionally, WSL anticipates receiving additional correspondence from the PADEP regarding the submission of Permit Modification #1 and subsequent submittal of the response to comments.

Material Problems or Delays

There were no material problems or delays related to performing Corrective Actions required by the Consent Order this quarter.

Leachate Disposal

The following table presents a summary of leachate hauled offsite for disposal during this quarter. All leachate was disposed of at an appropriately permitted facility as identified in the table below and a letter of acceptance from the facility was previously provided to the PADEP as part of Permit Modification #1 submitted to the PADEP on February 19, 2020.

Table 1 – Quarterly Summary of Leachate Disposal

Month / Year	Leachate Disposal Volume (gal)	Disposal Location
April 2020	2,398,975	Westerly (1)
May 2020	2,355,599	Westerly (1)
June 2020	1,442,829	Westerly (1)
Quarterly Total	6,197,403	-

(1) During this quarter, all leachate was disposed of at the Westerly Waste Water Treatment Plant in Duncansville, Pennsylvania.

Marketing

WSL submitted a letter to the Mon Valley Sewage Authority (Mon Valley) in Donora, Pennsylvania dated April 24, 2020 to summarize the current status of the landfill's leachate management practice as well as to request leachate influent parameters. Mon Valley issued a response letter to WSL dated May 5, 2020 stating that at the current time they were uninterested in accepting leachate from WSL but would entertain the potential of accepting leachate in the future once the HRT system has been installed. Copies of both letters are included with this Progress Report.



111 Conner Lane
Belle Vernon, PA 15012
Phone: 724-929-7697 / Fax: 724-929-7740

Mon Valley Sewage Authority
Thomas Salak
General Manager

Dear Mr. Salak,

Several months ago, Westmoreland Sanitary Landfill (WSL) employees attended a meeting of your Board to discuss WSL's status with regards to potentially starting leachate disposal/treatment at your plant. After WSL presented its plans, the Board asked that we provide it with further information regarding the leachate's chemical and physical characteristics. We went on to discuss potential pre-treatment options that the landfill was exploring and how that fit with negotiations with the PADEP at that time. The Board asked for data on potential flow volumes and chemical characteristics of the leachate after the discussed pre-treatment. The meeting ended with WSL agreeing to stay in contact with the Board regarding further developments concerning this issue.

On February 13, 2020, WSL entered into a Consent Order and Agreement (COA) with the Department. Currently and for the next several months, the landfill will be hauling by truck its leachate to various POTWs in Pennsylvania and Ohio. The COA acknowledges that this is necessary until a permit modification is granted allowing leachate treatment at the site. As part of this permit request, the site will be adding a Hydrogen Recovery Technology (HRT) unit. This device is a series of increasingly finer filters which remove suspended and dissolved particles from the fluid stream. Although it is designed specifically for petroleum element recovery, the filters will also remove similarly sized particles and will produce a "cleaner" pre-treated leachate product.

Additionally, the COA requires that the HRT be monitored and routinely tested to determine their efficiency and effectiveness. This testing will allow for WSL to provide the Board with data from the leachate after it has passed through the HRT. We believe this treatment will potentially bring the leachate to a level that will be acceptable to your plant. Once the HRT is operating, we would like to meet with your engineer and share the data from the testing.

In the future WSL is considering additional treatment of the leachate through chemical and biological methods and would share these plans with the Board as they develop. We are sending this letter to request influent parameters from your authority so that we can work on designing a system which will meet your influent requirements.

Sincerely,
Richard Walton
President

Mon Valley Sewage Authority

20 South Washington Street
Phone 724-379-4141

Donora, PA 15033
Fax 724-379-4690

May 5, 2020

Westmoreland Sanitary Landfill
Attn: Richard Walton
111 Conner Lane
Belle Vernon, PA 15012

Re: Request for leachate treatment

Dear Mr. Walton:

I am responding to your letter that we received on April 27, 2020 regarding Mon Valley Sewage Authority treating leachate from the Westmoreland Sanitary Landfill. At this current time, M.V.S.A. is not interested in accepting the leachate. At our monthly board meeting held on August 12, 2019 which Westmoreland Sanitary Landfill (WSL) employees attended, it was stated that WSL was going to install a pre-treatment facility. After that is done, we will entertain if M.V.S.A. wants to treat and analyze the leachate at WSL's expense.

Sincerely:



Thomas A. Salak
General Manager
Mon Valley Sewage Authority