



**WESTMORELAND
SANITARY
LANDFILL**

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

July 8, 2024

Bill Mura
Environmental Engineering Manager
PA Department of Environmental Engineering
400 Waterfront Drive
Pittsburgh, PA 15222

Dear: Mr. Mura

After reviewing your email received on June 27, 2024, we acknowledge that our application for a demonstration project to evaluate the use of ultrafiltration, cascading filtration, dissolved air flotation, aeration with a hydrogen peroxide drip, kinetic degradation fluxion filtration, and granulated activated carbon filtration in combination as pre-treatment for improving the quality of the landfill leachate will require a permit modification. Successful implementation of the pre-treatment may allow the leachate to be accepted at a local POTW via direct pipeline and reduce or eliminate the need for trucking.

As noted in your email, the requirements for a demonstration project are noted in Subchapter F of Chapter 271. Section 271.502 notes that the Department may waive any application or operating requirements except those pertaining to identification of interests, compliance information, public notice, and verification of applicant. With this in mind, Westmoreland Sanitary Landfill requests that the Department waive Sections 271.127 and 271.144 from the requirements for submission of this permit modification. These sections pertain to the environmental assessment evaluation and determination of the application status as a major versus minor permit application.

The environmental assessment (i.e. harms / benefits) evaluation is unnecessary and burdensome due to the fact that treatment of the leachate with the methods proposed in our application (on an individual basis) are proven to be effective in the industry. Any potential harm would be limited to localized leak or spill potential surrounding the equipment and this will be addressed with an updated PPC Plan in the permit modification. The basis of the demonstration aspect of the permit modification is the integration of modular units and the

specific technologies incorporated in each unit. Additionally, due to the modular nature of the equipment, units may be swapped in or out to maintain uptime and ease of maintenance. Westmoreland is unaware of any treatment facility using these methods in this specific application. The trial will be used to determine the applicability of these methods for a potential permanent future treatment facility at Westmoreland.

Additionally, since the scope of this demonstration project is so narrow and short term, the determination of the permit application being a minor permit application is appropriate. The landfill permit currently includes the ability to transport leachate via direct pipeline to multiple local POTW facilities. This temporary project may allow that method to be utilized as the primary method of disposal which will reduce or eliminate the use of over the road trucking to distant POTWs. The end result of this trial project will include a future permit modification to allow permanent use of these technologies or other proven treatment methods. A major permit modification requirement for this future permit modification would be appropriate.

Please contact me with any concerns or comments pertaining to this issue. Westmoreland would like to begin preparing the permit modification as soon as we receive a determination on the applicability of our waiver request.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Stewart", with a stylized flourish at the end.

Brian E Stewart

Vice President of Engineering