

November 6, 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 October 7, 2020
Corrective Action Plan
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 Corrective Action Plan behalf of the Westmoreland Sanitary Landfill, LLC. – Sanitary Landfill facility located in Rostraver Township, Westmoreland County, Pennsylvania. This Corrective Action Plan is being provided in accordance with Corrective Action Paragraph 3.e of the Consent Order and Agreement executed on October 7, 2020.

If you have any questions concerning this Corrective Action Plan, 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 Corrective Action Plan has been prepared for the Westmoreland Sanitary Landfill (WSL) as required by Corrective Action Paragraph 3.e of the Consent Order and Agreement (COA) executed October 7, 2020. The following sections present a description of actions and procedures to be performed by the facility to address longer-term issues at the facility to minimize the risk of future violations.

Onsite Runoff and Stormwater Management

WSL has been working to improve existing erosion and sedimentation controls as well as implement new controls as needed. WSL has removed sediment, reshaped and installed new rip-rap in approximately 1,250-lf of roadside channel, cleaned out multiple culverts and cleaned out over 2,000-lf of additional roadside channel in preparation of installing new rip-rap. Additionally, two (2) new culverts were installed from the entrance of the gas plant to pond C in accordance with the permit. A channel has been re-established behind the recently constructed wheel wash which will be lined with rip-rap.

The following ongoing work is currently being performed and considering the upcoming winter months, the work is estimated to be completed by June 2021.

- Pond C Upgrades including cleaning out sediment, replacing the existing riser structure, re-establishing the pond base and berm grades and inspecting / repairing the outlet channels as needed.
- Installing rip-rap in the previously excavated channel behind the wheel wash
- Inspecting, cleaning and repairing channels from Pond C to the outlet near the entrance of the landfill which empties into a tributary of Speers Run.
- Regrading the access road from the gas plant access road to the northwestern limit of the existing landfill footprint. This includes approximately 2,500-lf of roadway re-grading activities to promote positive stormwater drainage into the roadside channels.

These ongoing and proposed improvements to the facilities stormwater management system are anticipated to greatly minimize onsite runoff and restore the intention of the stormwater management system. Following completion of these improvements, the stormwater management system will be re-evaluated if needed.

Leachate Seeps and Erosion Gullies

WSL will work to minimize the presence of leachate seeps and erosion gullies by improving the process and procedure for the application of daily cover and intermediate cover. Additionally, temporary benches will be placed as needed on interim slopes to reduce erosion and more easily access leachate seeps for repair. WSL will designate a landfill employee as a responsible official to complete Daily Activity Reports and Weekly Inspection Reports that will include the inspection of daily cover, intermediate cover as well as the presence of seeps. The use of these forms will make landfill personnel more aware of the conditions of

the landfill to properly address any issues as needed.

An updated Form 14 is currently being prepared as required by Corrective Action Paragraph 3.h of the Consent Order and Agreement (COA) executed October 7, 2020. The updated Form 14 will be submitted to the Department for review and approval on or before November 6, 2020 and will include a Daily Activity Report log and Weekly Inspection Report that will be used by the facility to track daily operations as well as the overall condition of the facility. Following approval of the Form 14, the facility will begin completing the proposed Daily Activity Reports and Weekly Inspection Reports or utilize similar equivalent forms.

Intermediate Cover and Slope Requirements

WSL will assign a responsible official for ensuring the daily operational items presented on the Daily Activity Report have been completed. The responsible official will also complete a Weekly Inspection Report which includes a review of vegetation, erosion, leachate seeps among other items related to slope requirements and the condition of the landfill. The completion of these forms will ensure the intermediate cover and slope requirements are being met in accordance with 25 Pa. Code Section 273.233. Should the intermediate cover or slope requirements not be met, the responsible official will notify the operations manager or another official in a supervisory role to ensure the items are corrected as needed.

The Daily Activity Report and Weekly Inspection Report are discussed further under the Leachate Seeps and Erosion Gullies section of this Plan.

Vegetation

WSL will observe the conditions of vegetation on the intermediate cover slopes on a daily basis through completion of the Daily Activity Report. Vegetation on the final cover slopes as well as other vegetated areas outside of the waste disposal footprint will be observed on a weekly basis through completion of the Weekly Inspection Report. Stressed or absent vegetation will be noted by the responsible official and will be shared with the Landfill Manager to properly address areas of concern as needed.

Additionally, overall seeding of intermediate and final cover slopes will be performed biannually as needed. Stressed vegetation identified as part of daily or weekly observations will be repaired as needed. Seeding and vegetated areas will be tracked annually as part of the Annual Operation Report as required by 25 Pa. Code Section 273.313.

On-site Tracking of Mud and Access Road Maintenance

The wheel wash, paved roads and unpaved roads will be inspected on a daily basis to reduce the potential for tracking of dirt or mud. WSL will assign a responsible official for ensuring these items, which are presented on the Daily Activity Report, have been completed. Should

the roads or wheel wash require maintenance, the responsible official will notify the Operations Manager or another official in a supervisory role to ensure maintenance is performed as needed. Additionally, the facility may employ their street sweeper or onsite water truck (or similar) with pressurized water applications to address excessive build up of dirt and mud on the site roads to minimize tracking potential.

Further, the Responsible Official will also complete a Weekly Inspection Report that will include the access road, truck wash, E&S controls, leachate storage facilities and general site conditions. This weekly inspection will provide an additional level of review of the facilities components to further minimize tracking potential. The Daily Activity Report and Weekly Inspection Report are discussed further under the Leachate Seeps and Erosion Gullies section of this Plan.

Additionally, WSL has been working to improve existing stormwater management control features at the site. As discussed under the Onsite Runoff and Stormwater Management section of this plan, WSL will be regrading a significant portion of the access road as well as improving adjacent roadside channels. These combined efforts will improve the quality of the access road and reduce the potential of tracking of mud throughout the landfill.