

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

If you have any questions concerning this Operational Improvement 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 blue 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 Operational Improvement Plan has been prepared for the Westmoreland Sanitary Landfill (WSL) as required by Corrective Action Paragraph 3.b 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 minimize the risk of future violations associated with daily operations.

Daily Cover Application

WSL will assign a responsible official for ensuring the daily operational items presented on the Daily Activity Report have been completed. Specifically, the responsible official will verify that daily cover has been placed in accordance with 25 Pa. Code Section 273.232 and the facility's Form 14. In addition, site personnel will periodically take date / time stamped photographs of the completed daily cover placement for internal tracking and an additional level of verification.

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 that will be used by the facility to track daily operations. Following approval of the Form 14, the facility will begin completing the proposed Daily Activity Reports form or utilize a similar equivalent form.

Off-site Tracking of Dirt, Mud and Waste

The wheel wash, paved roads and unpaved roads will be inspected on a daily basis to reduce the potential for offsite 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. 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 offsite 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 offsite tracking potential. The Daily Activity Report and Weekly Inspection Report are discussed further under the Daily Operation Records section of this Plan.

Daily Operation Records

WSL will complete daily operational records in accordance with 25 Pa. Code Section 273.311 and copies of the records will be kept and maintained in the scale house for a

calendar month. At the conclusion of the calendar month, records may be moved to the landfill office for long term storage. As of September 1, 2020, WSL has been consistently completing daily operational records which have been reviewed by the PADEP inspector during September and October monthly inspections. Based on conversations with the inspector, the current practice for completing the daily operational records is satisfactory.

In addition to the daily operational records, a Responsible Official will be assigned the role of completing a Daily Activity Report and Weekly Inspection Report. As an added level of assurance, the Daily Activity Report will include a check to verify that the daily operational record has been completed and stored in the scale house.

Sample Daily Activity Report and Weekly Inspection Report forms will be included in an updated Form 14 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. Following approval of the Form 14, the site will begin using the Daily Activity Reports and Weekly Inspection Reports. The completed forms will be kept and maintained in the landfill office.

Operations Equipment

Operational equipment will be monitored by site operators during use and any equipment which requires maintenance or repair will be reported to the Operations Manager or other official in a supervisory role. Additionally, a Responsible Official will ensure that the site equipment will be inspected on a weekly basis to be verified and recorded on the Weekly Inspection Report.

WSL currently has more than sufficient equipment to adequately perform the operations at the facility. Should there be an unexpected equipment malfunction, excess equipment currently available at the site may be used to perform other duties outside of their normal purpose while the downed equipment can be repaired. For example, on a temporary basis, an excavator may be used in place of dozer and vice versa or a smooth drum roller may be used in place of a waste compactor. Should there be an equipment malfunction without a suitable temporary replacement onsite, the facility may contact a local equipment rental company to rent equipment until the appropriate repairs are completed. Additionally, the facility has been in conversation with local contractors that are interested in performing daily work at the site should there be an extended period of downed equipment or limited person to complete the required operations.

Site equipment will be maintained in accordance with 25 Pa. Code Section 273.215 and the facility's updated Form 14 to be submitted to the PADEP for review and approval by November 6, 2020.