

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT P.O. Box 8472, Harrisburg, PA 17105-8472

Inspection ID 2813046

Inspection Report - Municipal Waste Landfill

Permit Number	1012	47								
EPA I.D. Number					Employer	I.D. Number	(EIN)			
Facility Name	KEYS	STONE SANI LDF	:L		Operator	Name	KEYST	ONE SAN	LDFL INC	
Address	249 [DUNHAM DR			Address		249 DU	NHAM DF	₹	
City State Zip	DUN	MORE PA 18512	2-2827		City State	Zip	DUNMO	RE PA	18512-2686	
Municipality	3500	3 Dunmore			County		Lackaw	anna		
Responsible Official	DO	MINICK DENAPI	LES		Title		SITE M	GR		
Person Interviewed	Domi	inick Denaples			Title					
					Telephone	2 #			×	
Inspector	Robe	ert J Laczi			Title					
eFACTS ID #	lient	74717	Site	452485		PF.	479759	SF	347084	
Comment										
Inspection: D	ate Start	09/10/2021	Time Start			Date End	09/10/2021	Tim	te End	
Inspection Type R	TNC Ro	utine/Complete Insp	pection			Inspection Re	esult NOVIC	No Viola	ations Noted	
Permit Expiration D	ate	04/06/2025	Days/W	eek Operated	d 6		١	Max. Daily \	/olume 7500	
	1 - No \	Violation Obse rv e	d 2 - Not Ap	plicable 3	- Not Det	ermined 4	- Non Complia	ınce 5-l	Resolved	
. •							COM	MENTS	CHAPTER	LINE
STATUS			REQUI	REMENT			ATTA	CHED	CITATION	ITEM
STATUS 1 2 3 4 5					ıs		ATTA	ACHED	CITATION	ITEM
	Requir	red insurance in effe	GENERAL I	PROVISION			ATTA	_		
		red insurance in effe on in accordance wit	GENERAL I	PROVISION Date: 03/27	/2022		ATTA		71.371	1
	Operation	on in accordance wi	GENERAL Sect. Expiration (PROVISION Date: 03/27	/2022 nit.		ATTA		71.371 73.201(c)(2)	1 2
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	••	COMMENTS	CHAPTER	LINE
STATUS	REQUIREMENT	ATTACHED	CITATION	ITEM
1 2 3 4 5				
	Solid waste spread and compacted as approved by Department as part of permit,		273.216(c)	16
	Operator implements fugitive air contaminant control/measures and prevents and control pollution including no exceeding of ambient air quality standards, no open burning, and minimizing generation of fugitive dust emissions from the facility.	is air	273.217(a)	17
	Operator complies with Air Quality Plan approval and Air Quality Operating Permit.		273.217(b)	18
	Operator does not cause or allow attraction, harborage or breeding of vector.		273.218(a)	19
	Operator implements nuisance minimization and control plan.		273.218(b)(1)	20
	Operator performs regular, frequent, and comprehensive site inspections to reduce poten for offsite odors.	itial 🔲	273,218(b)(2)	21
	Operator promptly addresses and correct problems and deficiencies discovered during inspections,		273.218(b)(3)	22
	Operator implements nuisance minimization and control plan to minimize and control oth conditions harmful to the environment or public health, or which create safety hazards, o dirt, noise, unsightliness and other public nuisances.	er dors, 🔲	273.218(c)	23
	Operator does not receive solid waste at a landfill in excess of the maximum or average of volume approved in the permit.	daily 🔲	273,221(a)	24
	Operator implements radiation protection action plan.		273.223(a)	25
	Operator monitors incoming waste in accordance with Department's guidance or in a mar at least as protective of the environment, facility staff and public health and safety.	nner 🔲	273.223(b)	26
	Radiation detector elements shall be as close as practical to wasteload and in appropriate geometry to monitor the waste.	· 🗆	273.223(c)	27
	Operator has portable radiation monitors capable of determining the dose rate and preservontamination of a vehicle that has caused an alarm. Upon exceedance of alarm level, a radiological survey of the vehicle is performed.	nce of	273.223(d)	28
	Operator notifies Department immediately and isolates vehicle when radiation dose rates exceeded.	are \square	273.223(e)	29
	Monitoring equipment is calibrated at frequency specified by manufacturer, but not less to once a year.	han \square	273.223(f)	30
	If radioactive material is detected, vehicle containing material shall not leave facility without written Department approval and an authorized federal Department of Transportation exemption form.	out $\ \square$	273.223(g)	31
	Uniform cover of the approved daily cover material is placed on exposed solid waste at the of each working day or at the end of every 24 hours, whichever interval is less.	ne end	273.232(a)	32
	If intermediate cover regires revegetation, it is established within 30 days.		273.233(e)	33
	Slopes constructed during daily landfilling and intermediate cover facilities may not excee percent.	d 50	273.233(f)	34

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1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance 5 - Resolved

	СОМІ	MENTS	CHAPTER	LINE
STATUS	REQUIREMENT ATTA	CHED	CITATION	ITEM
1 2 3 4 5				
	Operator does not cause or allow waste pollution within or outside the site from operation of the facility.		273.241(a)-(c)	35
	Operator has restored or replaced adversely affected water supply with an alternative source of like quantity and quality.		273.245(a)	36
	Temporary water supply is provided within 48 hours.		273.245(b)	37
	Permanent water supply is provided within 90 days.		273.245(c)	38
	No waste 15 feet of inside top of the lined perimeter berm.		273.252(e)	39
	Lined perimeter berm 4 ft. high constructed and maintained along edge of the lined disposal area.		273.252(f)	40
	Edge of liner clearly marked.		273.252(g)	41
	Alternate leachate recirculation method may be used if approved if one of the liner systems is a composite liner.		273.274(b)	42
	Underground pipes used to transport leachate to leachate storage impoundments or tanks equipped with secondary containment or comply with 245.445.		273.275(g)	43
	Operator isolates coal seams, coal outcrops and coal refuse from waste deposits to prevent combustion of waste and damage to liner.		273.291(a)	44
	Mine openings within site sealed as approved by Department.		273.291(b)	45
	Operator implements plan for controlling potential damage from subsidence submitted and approved under 273.120.		273.291(c)	46
	Landfill designed, constructed, maintained and operated to prevent and minimize potential for fire, explosion, or release of solid waste constituents into air, water, or soil of the Commonwealth.		273.301	47
	Emergency equipment including portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment available. For fire equipment requiring water, facility has a water supply of adequate quantity and pressure to supply the equipment.		273.302(a)	48
	Emergency equipment tested and maintained.		273.302(c)	49
	Adequate space maintained to allow unobstructed movement of emergency personnel and equipment.		273.302(d)	50
	Litter controlled/collected and barriers/fences in place.		273.220(a)-(c)	51
	COVER/SLOPES/REVEGETATION			
	Daily/intermediate cover meets performance and design requirements.		273.232(b) AND 273.233(b), (c)	52
	Minimum 5 day supply of daily and intermediate cover maintained on-site,		273.232(c) AND 273.233(d)	53
	Intermediate cover applied within time limits.		273.233(a)	54
	Intermediate slopes do not exceed 50%.		273.232(d)	55
	Cap placed over entire surface of final lift meets performance standards.		273.234(a)(1)	56
	Final cover meets performance and design requirements; applied within time limits.		273.234(b)-(e)	57
	Final slopes stable and erosion controlled.		273.234(f)	58
	Final slopes graded 3-15% or terraced to 33% as approved.		273.234(g)	59

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STATUS	REQUIREMENT	ATTACHED	CITATION	ITEM
1 2 3 4 5	Minimum revegetation and successful revegetation requirements adhered to.		273.234(a)-(e) AND 273.236(a), (b)	60
	WATER QUALITY PROTECTION			
	Surface and groundwater treatment facilities properly operated and maintained.		273.241(b)	61
	Surface water percolation minimized/prevented.		273.232(b)(1) AND 273.234(e)(4)	62
	Soil erosion and sedimentation controls designed and implemented as per approved plans gullies over nine inches repaired.	s; 🗆	273.242(a)-(c)	63
	Sedimentation ponds and discharge structures designed, constructed, operated, and maintained in accordance with Chapters 273, 102, and 105.		273.243(a)-(g) AND 273.244	64
	LINER SYSTEM			
	Liner system designed, constructed, operated, and maintained when required.		273.251(a), (b)	65
	Edge of liner requirements adhered to (i.e., no waste within 25 feet if adjacent liner, 4 fe high lined berm, to prevent lateral escape of leachate, adequate spacing on inside of bern collect stormwater and sediment).		273.252(d)	66
	Leachate detection zone monitored weekly.		273.255(c)	67
	Protective cover protects primary liner and leachate collection system and allows free flow leachate into the collection system.	w of	273.257(a)	68
	Protective cover meets minimum requirements and at least 18 inches thick.		273.257(b)	69
	Leachate collection system within protective cover meets minimum requirements.		273.258(a), (b)	70
	Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.		273.259(a)-(d)	71
	8 feet of select waste placed over protective cover.		273.260	73
	LEACHATE TREATMENT			
	Leachate collected and handled through Department approved method(s)		273.272(a)-(c)	74
	Leachate transportation requirements adhered to.		273.273(a)-(c)	75
	Cessation of site operation if alternate leachate handling not available.		273.273(d)	76
	Leachate treatment system permitted and fully operational at least 3 years before closure	e. 🗆	273 . 273(e)	77
	Leachate recirculation in accordance with regulators.		273.274(1)-(4)	78
	Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallowhichever is greater.	ons,	273.275(a)-(f)	79
	Leachate flow rate measured daily; analyzed quarterly.		273.276(a)-(b)	80
	Department notified when remedial action(s) required.		273.277(1)-(4)	81
	WATER QUALITY MONITORING			
	Approved monitoring system installed and maintained.		273.281(a), (b) AND 273.283	82

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	COMM	IENTS	CHAPTER	LINE
STATUS	REQUIREMENT	CHED	CITATION	ITEM
1 2 3 4 5				
	Quarterly and annual monitoring requirements adhered to and results submitted to Department within time constraints. $ \\$		273.284 AND 273.285	83
	Groundwater assessment plan submitted and implemented as required.		273.286(a)-(g)	84
	Groundwater abatement plan submitted and implemented as required.		273.287(a)-(f)	85
	RECORDKEEPING AND REPORTING			
	Operational records maintained, available and submitted as required.		273.288 AND 273.311-273.313	86
	Daily Operational Records kept in accordance with regulations for the life of the facility bond or longer if necessary.		273.311(d)	87
	Operator submits quarterly operation report.		273.312	88
	Operator submits annual operation report with fee.		273.313	89
	MINERALS AND GAS			
	Gas venting and monitoring in accordance with approved plans.		273.292(a)-(d)	90
	Combustible gas levels not exceeded.		273.292(e)	91
	Forced gas venting if required.		273.292(f)	92
	Gas recovery conducted as per approved plan and Section 273,293, including annual analysis.		273.293(a), (b)	93
	EMERGENCY PROCEDURES			
	Contingency plan implemented if there is an emergency.		273.303(a)-(c)	94
	RECYCLING	_	•	
	Operator shall salvage and recycle waste in accord with recycling plan. (273.196)		273.331(a)	95
	Salvaging and recycling controlled by operator and prevents interference within operations and prevents health hazardous nuisance.		273.331(b)	96
	Salvaged materials stored in an approved area or transported offsite.		273.331(c)	97
	Drop off center established for at least three recyclables.		273.332(a)	98
	Drop off center properly located, contains bins or containers, open at least 8 hours per week and 4 hours during evenings or weekends.		273.332(b), (c)	99
	Approved public notice of availability of drop off center availability is provided.		273.332(d)	100
2 0000	On or before January 15 each year, operator informs municipality in writing of weight and type of materials recycled previous year.		273.332(e)	101
	SPECIAL HANDLING AND RESIDUAL WASTES			
	Special handling and residual wastes disposed with prior Department approval, and in accordance with permit and Chapter 273.		273.501	102
	Infectious waste disposal restrictions adhered to.		273.511(a)-(d)	103
	Chemotherapeutic waste disposal restrictions adhered to.		273.512	104
	Sewage sludge co-disposal and monofill requirements followed.		273.513	105
	Sewage sludge sampling requirements adhered to and sludge meets standards for control of pathogens, vectors, and odors.		273.13(c)	106
	Disposal of municipal waste incineration ash in landfill or landfill cell that meets Chapter 273 requirements.		273.514(a)	107

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1 2 3 4 5				
	Ash residue disposal in dedicated landfill or landfill cell unless co-disposal in accordance v Chapter 273 (including leachability treatment).	with	273.514(b)	108
	Ash residue covered immediately or as approved by the Department.		273.514(c)	109
	BONDING AND INSURANCE			
	Bond filed with Department.		271.312	110
	Bond maintained in an amount and with guarantees as required.			
	- Bond amount \$ 34,284,695		271.333(b)	111
	- Phased Deposit Due Date:			
	Proof of a commercial policy of liability insurances submitted to the Department as specifi 271.374.	ied by		
	Policy # ER00G4L21		271.374	112
	Insurer (company name) Aspen Spec Ins Co			
	Expiration Date:			

2540-FM-BWM0131

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Company/Facility/Site Name KEYSTONE SANI LDFL

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INSPECTION REPORT SIGNATURE PAGE

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either Violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Date	9/13/21
Date	09/13/2021

2540-FM-BWM0131

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

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INSPECTION REPORT COMMENTS

Comments:

A routine inspection was conducted at Keystone Sanitary Landfill with KSL site manager Dominick Denaples and Robert Laczi of the PA DEP. The following items/elements were observed/discussed:

Access road and road leading to the working face were observed to be free of litter and debris. Water truck was in operation for the purpose of dust suppression.

Working face operations were observed to be accordance with Departmentally approved methods. Two working faces in Pad 12 were in use at the time with two compactors and bulldozers in use at each of the working faces to ensure proper compaction of waste is achieved. Employees were observed to be monitoring waste where the eight feet of select waste was being placed on the protective cover to reduce the risk of materials puncturing the liner.

Slopes were observed to be in good condition with no leachate seeps noted at the time of the inspection. Erosion gullies caused by recent heavy rain continue to be addressed as part of routine maintenance. No litter was noted on any of the slopes and all waste was contained within the working face areas.

No off site odors were noted at the time of inspection.

Leachate in storage in the lagoons at the time of inspection was at 67% capacity. Approximately 350,000 gallons of leachate was being stored in the temporarily approved above ground storage tank and no leachate was being stored in the temporary 1.68 million gallon tank. No treated effluent has been sent off site via outfall O2 (Reeves Street manhole D225) to the Pennsylvania American Water Scranton Waste Water treatment plant. Facility continues to aggressively ship leachate off site to reduce leachate volume.

There have been no problems to report with the gas collection system. Gas is sent to PEI with the remainder being flared off.