

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

Inspection ID 2817528

Inspection Report - Municipal Waste Landfill

Permit Number	10124	\$7									
EPA I.D. Number					Employer	I.D. Number	(EIN)				
Facility Name	. KEYS	STONE SANI LDF	L		Operator (Name		KEYSTO	NE SAN	II LDFL INC	
Address	249 🗅	OUNHAM DR			Address			249 DUNI	HAM DI	R	
City State Zip	DUNN	MORE PA 1851:	2-2827		City State	Zip		DUNMOR	E PA	18512-2686	
Municipality	35003	3 Dunmore			County			Lackawar	ma		
Responsible Officia	I DON	MINICK DENAP	LES		Title			SITE MGI	3		
Person Interviewed	Same	•			Title						
					Telephone	#				x	
Inspector	Robe	rt J Laczi			Title						
eFACTS ID #	Client	74717	Site	452485		PF	4797	759	SF	3470	84
Comment											
Inspection:	Date Start	10/07/2021	Time Start			Date End	10/0	7/2021	Τīr	ne End	
Inspection Type F	RTNC Rou	utine/Complete Ins	pection			Inspection R	esuit	NOVIO	No Viol	ations Noted	
Permit Expiration D)ate	04/06/2025	Davs/We	ek Operater	1 6			Ma	x, Daily	Volume 750	0
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STATUS			REQUI	REMENT				ATTAC		CITATION	ITEM
STATUS 1 2 3 4 !	i		REQUI	REMENT							
	i		REQUIS		ıs						
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	Requir	red insurance in eff on in accordance wi	GENERAL P ect. Expiration D	PROVISION Pate: 03/27	//2022				HED ;	CITATION	ITEM
	Requir		GENERAL P ect. Expiration D ith approved plan	PROVISION Pate: 03/27	1/2022 nlt.					CITATION 271.371	ITEM
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Identification Number

2817528

Inspection Date

10/07/2021

	1975 - 19	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.	s 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 potention offsite odors.	rtial 🔲	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.		273.218(c)	23
	Operator does not receive solid waste at a landfill \ln excess of the maximum or average α 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
00000	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 prese contamination of a vehicle that has caused an alarm. Upon exceedance of alarm level, a radiological survey of the vehicle is performed.	ence of	273.223(d)	28
	Operator notifies Department Immediately and isolates vehicle when radiation dose rates exceeded.	are	273.223(e)	29
	Monitoring equipment is calibrated at frequency specified by manufacturer, but not less to once a year.	nert	273.223(f)	30
	If radioactive material is detected, vehicle containing material shall not leave facility with written Department approval and an authorized federal Department of Transportation exemption form.	out	273.223(g)	31
00000	Uniform cover of the approved dally cover material is placed on exposed solld waste at to of each working day or at the end of every 24 hours, whichever interval is less.	he 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 exceed percent.	ed 50	273.233(f)	34

Identification Number

2817528

Inspection Date

10/07/2021

	co	MMENTS	CHAPTER	LINE
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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 like quantity and quality.	of \square	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 i composite liner.	sa 🗆	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
80000	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.	or 🔲	273.301	47
	Emergency equipment including portable fire extinguishers, fire control equipment, splil cont equipment, and decontamination equipment available. For fire equipment requiring water, facility has a water supply of adequate quantity and pressure to supply the equipment.	rol 🔲	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

Identification Number

2817528

Inspection Date 10/07/2021

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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 plan guilles over nine inches repaired.	ns;	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 f high lined berm, to prevent lateral escape of leachate, adequate spacing on inside of be 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 flueachate into the collection system.	ow 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 closu	re.	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 gawhichever is greater.	llons,	273.275(a)-(f)	79
	Leachate flow rate measured daily; analyzed quarterly.		273.276(a)-(b)	80
20000	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

Identification Number

2817528

Inspection Date

10/07/2021

	CON	MENTS	CHAPTER	LINE
STATUS		ACHED	CITATION	ITEM
1 2 3 4 5				
Ø0000	Quarterly and annual monitoring requirements adhered to and results submitted to Department within time constraints.	nt 🗆	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 of longer if necessary.	r 🗆	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 an prevents health hazardous nuisance.	4 🗆	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 blns 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
	On or before January 15 each year, operator informs municipality in writing of weight and typo f materials recycled previous year.	e [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 monofili requirements followed.		273.513	105
80000	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

Identification Number

2817528

Inspection Date

10/07/2021

		OMMENTS	CHAPTER	LINE
STATUS	REQUIREMENT	ATTACHED	CITATION	ITEM
1 2 3 4 5				
	Ash residue disposal in dedicated landfill or landfill cell unless co-disposal in accordance with Chapter 273 (including leachability treatment).	т 🗆	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 specific 271.374.	ed by		
	Policy # R00G4L21		271.374	112
	Insurer (company name) Aspen Spec. Ins			
	Expiration Date: 03/27/2022			

2540-FM-BWM0131

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Company/Facility/Site Name KEYSTONE SANILDFL

Identification Number

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10/07/2021

INSPECTION REPORT COMMENTS

Comments:

A routine inspection was conducted at Keystone Sanitary Landfill with Site Manager Dominick Denaples and Robert Laczi and Ryan Wysocki of the Pa DEP. The following items/elements were observed/discussed:

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

Access road and road leading to the working face were observed to be clean and free of litter and debris. Water truck was in operation at the time of the inspection and no dusty conditions were noted.

Slopes were observed to be in good condition with no litter or leachate seeps observed at the time of inspection. Some erosion gullies noted on the intermediate slopes will be addressed as part of routine maintenance. A small test plot of a PennDOT approved wildflower mix was started on a closed portion of the landfill to determine potential use as it would reduce mowing frequency.

Working face operations in Pad 12 were observed to be in accordance with Departmentally approved methods. Two working faces were in operation with two tippers, three buildozers and one compactor in use at each. No windblown litter was observed away from the working face at the time. Placement of 8' of select waste on the bottom of Pad 12 has been completed while placement on slope continues. Employee was observed to be monitoring incoming waste and removing any waste which may impact the integrity of the liner. Slight garbage odor was noted near the working face and no other odors were noted on site. The temporary cap on 5.5 acres of Pad 12 has been completed which will reduce influent of leachate into the storage lagoons by diverting rain water to on site E&S controls.

There have been no problems to report with the leachate treatment plant. Leachate levels continue to be reduced with 41% of capacity in the storage lagoons and 755,014 gallons stored in the alternative emergency storage tanks. The new RO treatment unit is enroute from Germany and should be in operation by December 2021.

There have been no problems to report with the gas collection system. Gas was being sent to PEI with the remainder of the gas being flared off. Construction of the new gas to energy plant continues and should be operational by late 2021.

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.

Person Interviewed	(Signature)	Date	10/15/21
Inspector	Robert Laczi (Signature)	Date _	10/14/2021