

## Municipal Waste Landfill Inspection Report

<b>Permit Number</b>	101247	<b>EPA ID Number</b>	----
<b>Facility Name</b>	KEYSTONE SANI LDFL	<b>Operator Name</b>	KEYSTONE SANI LDFL INC
<b>Address</b>	249 DUNHAM DR	<b>Address</b>	249 DUNHAM DR
<b>City/State/Zip</b>	DUNMORE PA 18512-2827	<b>City/State/Zip</b>	DUNMORE PA 18512-2686
<b>Municipality</b>	Dunmore Borough	<b>County</b>	Lackawanna
<b>Responsible Official</b>	Dominick DeNaples Jr	<b>Title</b>	Site Manager
<b>Person Interviewed</b>	Dominick DeNaples Jr	<b>Title</b>	Site Manager
<b>Lead Inspector</b>	ROBERT J LACZI	<b>Telephone #</b>	1
<b>Site ID</b>	452485	<b>Title</b>	SLD WSTE SPCST
<b>PF ID</b>	479759	<b>Client ID</b>	74717
<b>Inspection Start Date</b>	09/26/2023 08:32 AM	<b>SF ID</b>	347084
<b>Inspection Type</b>	RTNC - Routine/Complete Inspection	<b>Inspection End Date</b>	09/26/2023 04:00 PM
<b>Permit Expiration Date</b>	04/06/2025	<b>Inspection Result</b>	No Violations Noted
		<b>Days/Week Operated</b>	6
		<b>Max. Daily Volume</b>	7500

### Check Lists

Municipal Waste Landfill (0131)			
Status	Requirement	Chapter Citation	Line Item
<b>GENERAL PROVISIONS</b>			
No Violation	Required insurance in effect	271.371	1
	(expiration date) 03/27/2024		1A
No Violation	Operation in accordance with approved plans and permit.	273.201(c)(2)	2
No Violation	Operation within permit boundaries (vertical and horizontal).	273.201(c)(2)	3
No Violation	Disposal Timing and sequence as per Section 273.112(1).	273.201(c)(2)	4
No Violation	No unapproved wastes or liquids.	273.201(d)-(m)	5

No Violation	Isolation distances are adhered to.	273.202(a)	6
No Violation	Facilities certification requirements followed.	273.203(a), (b)	7
No Violation	Written Department approval of new construction prior to waste disposal.	273.203(c)	8
<b>DAILY OPERATIONS</b>			
No Violation	Proper signs posted.	273.211(a)	9
No Violation	Site perimeter clearly marked and grid coordinate system in use.	273.211(b)-(d)	10
No Violation	Proper barriers installed around site and access controlled when attendant not present.	273.212(a)-(i)	11
No Violation	Access roads maintained and negotiable by collection vehicles.	273.213(a)-(i)	12
No Violation	Approved means of measuring and inspected waste utilized.	273.214(a), (b)	13
No Violation	Adequate equipment on-site and stand-by equipment available.	273.215(a), (b)	14
No Violation	Vehicles directed promptly to unloading area and promptly unloaded.	273.216(a), (b)	15
No Violation	Solid waste spread and compacted as approved by Department as part of permit.	273.216(c)	16
No Violation	Operator implements fugitive air contaminant control/measures and prevents and controls air pollution including no exceeding of ambient air quality standards, no open burning, and minimizing generation of fugitive dust emissions from facility.	273.217(a)	17
No Violation	Operator complies with Air Quality Plan approval and Air quality Operating Permit.	273.217(b)	18
No Violation	Operator does not cause or allow attraction, harborage, or breeding of vector.	273.218(a)	19
No Violation	Operator implements nuisance minimization and control plan.	273.218(b)(1)	20
No Violation	Operator performs regular, frequent, and comprehensive site inspections to reduce potential for offsite odors.	273.218(b)(2)	21

No Violation	Operator promptly addresses and correct problems and deficiencies discovered during inspections.	273.218(b)(3)	22
No Violation	Operator implements nuisance minimization and control plan to minimize and control other conditions harmful to the environment or public health, or which create safety hazards, odors, dirt, noise, unsightliness and other public nuisances.	273.218(c)	23
No Violation	Operator does not receive solid waste at a landfill in excess of the maximum or average daily volume approved in the permit.	273.221(a)	24
No Violation	Operator implements radiation protection action plan.	273.223(a)	25
No Violation	Operator monitors incoming waste in accordance with Department's guidance or in a manner at least as protective of the environment, facility staff and public health and safety.	273.223(b)	26
No Violation	Radiation detector elements shall be as close as practical to wasteload and in appropriate geometry to monitor the waste.	273.223(c)	27
No Violation	Operator has portable radiation monitors capable of determining the dose rate and presence of contamination of a vehicle that has caused an alarm. Upon exceedance of alarm level, a radiological survey of the vehicle is performed.	273.223(d)	28
No Violation	Operator notifies Department immediately and isolates vehicle when radiation dose rates are exceeded.	273.223(e)	29
No Violation	Monitoring equipment is calibrated at frequency specified by manufacturer, but not less than once a year.	273.223(f)	30
No Violation	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.	273.223(g)	31
No Violation	Uniform cover of the approved daily cover material is placed on exposed solid waste at the end of each working day or at the end of every 24 hours, whichever interval is less.	273.232(a)	32
No Violation	If intermediate cover requires revegetation, it is established within 30 days.	273.233(e)	33

No Violation	Slopes constructed during daily landfilling and intermediate cover activities may not exceed 50 percent.	273.233(f)	34
No Violation	Operator does not cause or allow waste pollution within or outside the site from operation of the facility.	273.241(a)-(c)	35
No Violation	Operator has restored or replaced adversely affected water supply with an alternative source of like quantity and quality.	273.245(a)	36
No Violation	Temporary water supply is provided within 48 hours.	273.245(b)	37
No Violation	Permanent water supply is provided within 90 days.	273.245(c)	38
No Violation	No waste 15 feet of inside top of the lined perimeter berm.	273.252(e)	39
No Violation	Lined perimeter berm 4 ft. high constructed and maintained along edge of the lined disposal area.	273.252(f)	40
No Violation	Edge of liner clearly marked.	273.252(g)	41
No Violation	Alternate leachate recirculation method may be used if approved if one of the liner systems is a composite liner.	273.274(b)	42
No Violation	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
No Violation	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
No Violation	Mine openings within site sealed as approved by Department.	273.291(b)	45
No Violation	Operator implements plan for controlling potential damage from subsidence submitted and approved under 273.120.	273.291(c)	46
No Violation	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

No Violation	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 or adequate quantity and pressure to supply the equipment.	273.302(a)	48
No Violation	Emergency equipment tested and maintained.	273.302(c)	49
No Violation	Adequate space maintained to allow unobstructed movement of emergency personnel and equipment.	273.302(d)	50
No Violation	Litter controlled/collected and barriers/fences in place.	273.220(a)-(c)	51
<b>COVER/SLOPES/REVEGETATION</b>			
No Violation	Daily/intermediate cover meets performance and design requirements.	273.232(b), 273.233(b), (c)	52
No Violation	Minimum 5 day supply of daily and intermediate cover maintained on-site.	273.232(c) & 273.233(d)	53
No Violation	Intermediate cover applied within time limits.	273.233(a)	54
No Violation	Intermediate slopes do not exceed 50%.	273.232(d)	55
No Violation	Cap placed over entire surface of final lift meets performance standards.	273.234(a)(1)	56
No Violation	Final cover meets performance and design requirements; applied within time limits.	273.234(b)-(e)	57
No Violation	Final slopes stable and erosion controlled.	273.234(f)	58
No Violation	Final slopes graded 3-15% or terraced to 33% as approved.	273.234(g)	59
No Violation	Minimum revegetation and successful revegetation requirements adhered to.	273.235(a)-(e) & 273.236(a), (b)	60
<b>WATER QUALITY PROTECTION</b>			
No Violation	Surface and groundwater treatment facilities properly operated and maintained.	273.241(b)	61
No Violation	Surface water percolation minimized/prevented.	273.242(b)(1) & 273.234(e)(4)	62
No Violation	Soil erosion and sedimentation controls designed and implemented as per approved plans; gullies over nine inches repaired.	273.242(a)-(c)	63

No Violation	Sedimentation ponds and discharge structures designed, constructed, operated, and maintained in accordance with Chapters 273, 102, and 105.	273.243(a)-(g) & 273.244	64
<b>LINER SYSTEM</b>			
No Violation	Liner system designed, constructed, operated, and maintained when required.	273.251(a), (b)	65
No Violation	Edge of liner requirements adhered to (i.e., no waste within 25 feet if adjacent liner, 4 feet high lined berm, to prevent lateral escape of leachate, adequate spacing on inside of berm to collect stormwater and sediment).	273.252(d)	66
No Violation	Leachate detection zone monitored weekly.	273.255(c)	67
No Violation	Protective cover protects primary liner and leachate collection system and allows free flow of leachate into the collection system.	273.257(a)	68
No Violation	Protective cover meets minimum requirements and at least 18 inches thick.	273.257(b)	69
No Violation	Leachate collection system within protective cover meets minimum requirements.	273.258(a), (b)	70
No Violation	Barrier designed, constructed and maintained as required to prevent lateral migration of leachate off-site in surface mined areas.	273.259(a)-(d)	71
No Violation	8 feet of select waste placed over protective cover.	273.260	73
<b>LEACHATE TREATMENT</b>			
No Violation	Leachate collected and handled through Department approved method(s).	273.272(a)-(c)	74
No Violation	Leachate transportation requirements adhered to.	273.273(a)-(c)	75
No Violation	Cessation of site operation if alternate leachate handling not available.	273.273(d)	76
No Violation	Leachate treatment system permitted and fully operational at least 3 years before closure.	273.273(e)	77
No Violation	Leachate recirculation in accordance with regulations.	273.274(1)-(4)	78
No Violation	Leachate collection and storage systems on-site have capacity of 30 days or 250,000 gallons, whichever is greater.	273.275(a)-(f)	79

No Violation	Leachate flow rate measured daily; analyzed quarterly.	273.276(a)-(b)	80
No Violation	Department notified when remedial action(s) required.	273.277(1)-(4)	81
<b>WATER QUALITY MONITORING</b>			
No Violation	Approved monitoring system installed and maintained.	273.281(a), (b) & 273.283	82
No Violation	Quarterly and annual monitoring requirements adhered to and results submitted Department within time constraints.	273.284 & 273.285	83
No Violation	Groundwater assessment plan submitted and implement as required.	273.286(a)-(g)	84
No Violation	Groundwater abatement plan submitted and implemented as required.	273.287(a)-(f)	85
<b>RECORDKEEPING AND REPORTING</b>			
No Violation	Operational records maintained, available and submitted as required.	273.288 & 273.311-273.313	86
No Violation	Daily Operational Records kept in accordance with regulations for the life of the facility bond or longer if necessary.	273.311(d)	87
No Violation	Operator submits quarterly operation report.	273.312	88
No Violation	Operator submits annual operation report with fee.	273.313	89
<b>MINERALS AND GAS</b>			
No Violation	Gas venting and monitoring in accordance with approved plans.	273.292(a)-(d)	90
No Violation	Combustible gas levels not exceeded.	273.292(e)	91
No Violation	Forced gas venting if required.	273.292(f)	92
No Violation	Gas recovery conducted as per approved plan and §273.293, including annual analysis.	273.293(a), (b)	93
<b>EMERGENCY PROCEDURES</b>			
No Violation	Contingency plan implemented if there is an emergency.	273.303(a)-(c)	94
<b>RECYCLING</b>			

No Violation	Operator shall salvage and recycle waste in accord with recycling plan. (273.196)	273.331(a)	95
No Violation	Salvaging and recycling controlled by operator and prevents interference within operations and prevents health hazardous nuisance.	273.331(b)	96
No Violation	Salvaged materials stored in an approved area or transported offsite.	273.331(c)	97
No Violation	Drop off center established for at least three recyclables.	273.332(a)	98
No Violation	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
No Violation	Approved public notice of availability of drop off center availability is provided.	273.332(d)	100
No Violation	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
<b>SPECIAL HANDLING AND RESIDUAL WASTES</b>			
No Violation	Special handling and residual wastes disposed with prior Department approval, and in accordance with permit and Chapter 273.	273.501	102
No Violation	Infectious waste disposal restrictions adhered to.	273.511(a)-(d)	103
No Violation	Chemotherapeutic waste disposal restrictions adhered to.	273.512	104
No Violation	Sewage sludge co-disposal and monofill requirements followed.	273.513	105
No Violation	Sewage sludge sampling requirements adhered to and sludge meets standards for control of pathogens, vectors, and odors.	273.513(c)	106
Not Applicable	Disposal of municipal waste incineration ash in landfill or landfill cell that meets Chapter 273 requirements.	273.514(a)	107
Not Applicable	Ash residue disposal in dedicated landfill or landfill cell unless co-disposal in accordance with Chapter 273 (including leachability treatment).	273.514(b)	108
Not Applicable	Ash residue covered immediately or as approved by the Department.	273.514(c)	109



**BONDING AND INSURANCE**

No Violation	Bond filed with Department.	271.312	110
No Violation	Bond maintained in an amount and with guarantees as required.	271.333(b)	111
	Bond amount \$34,284,695.00		111A
	Phased deposit due date		111B
No Violation	Proof of a commercial policy of liability insurances submitted to the Department as specified by 271.374.	271.374	112
	Policy # EROOG4L23		112A
	Insurer (company name) Aspen Specialty Insurance		112B
	Expiration Date: 03/27/2024		112C

## Comments

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

Access road was wetted down for dust control purposes and was free of litter and debris. Road leading to the working faces was observed to be free of litter and debris and well kept to allow for efficient ingress and egress of traffic.

Slopes were observed to be in good overall condition with no leachate seeps observed at the time of the inspection. Erosion gullies observed during August inspection have been repaired and slopes were prepared for deployment of final cover. Erosion gullies which have been formed due to recent heavy rains were being repaired at the time of inspection.

Working face operations in Pads 10 and 11 were observed to be in accordance with Departmentally approved methods. Several compactors and bulldozers were in use to ensure proper compaction rates are met. Working face/gas odors were noted near the working faces.

There have been no problems to report with the gas collection system. ASSAI was flaring gas at the time of the inspection and keystone was operating 2 flares at the time. Some landfill gas/waste odors were noted near the anchor trench of ongoing capping activities on site. September ISOPACH map was reviewed and areas of concern noted on the map are addressed as soon as possible.


There have been no problems to report with the leachate treatment plant and leachate levels were at 18.57% of capacity. Venturi aeration system was non operational as it is anticipated that second Venturi system should soon be operational at which time both will be in operation. Odor control misters were in use at the time of the inspection and no odors were noted near the leachate lagoons at the time of the inspection.

Construction of Pads 1&2 continues and Form 37 construction certification should soon be submitted to the Department. Excavation in Phase III expansion continues. Liner crews were on site at the time of the inspection and work is expected to continue through fall to attempt to cap as much as possible of what areas are at final elevation.

### 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. 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 of this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

### Signatures

Person Interviewed	Unable To Obtain Reason: Emailed 10/02/23	Date	--/------
Inspector		Date	10/02/2023