



October 6, 2025

Mr. Dominick DeNaples, Jr., Site Manager
Keystone Sanitary Landfill, Inc.
249 Dunham Drive
Dunmore, PA 18512
via email: dominickd@kslco.com

Re: Operating Permit Extension
Keystone Sanitary Landfill, Inc.
Permit Renewal Application
Application No. 101247-A241
APS ID# 1111148, AUTH ID# 1479927
Dunmore and Throop Boroughs, Lackawanna County

Dear Mr. DeNaples:

Reference is made to the permit renewal application received by the Pennsylvania Department of Environmental Protection (Department) on April 3, 2024. This application is for renewal of the operating permit for Keystone Sanitary Landfill, Inc. (KSL), located at 249 Dunham Drive, Dunmore, Lackawanna County.

The renewal application was deemed administratively complete on April 11, 2024. Technical review of the renewal application commenced at that time. As you are aware, the current permit expired on April 6, 2025, and an extension to October 6, 2025 was issued. On July 18, 2025, a Technical Deficiency Letter was issued to KSL, and on September 17, 2025, a response from KSL was received by the Department.

The Department is hereby granting an extension to the term of KSL permit until **December 31, 2026**. Except as explicitly identified in the permit conditions and the enclosed Form 13-A, no other operation or construction change has been approved by this action.

This extension is granted in order to allow the Department sufficient time to evaluate KSL's September 17, 2025 response to the Department's Renewal Review Letter issued on July 18, 2025 and it affords KSL time to respond to any additional deficiencies that the Department may identify. The Department's Renewal Review Letter also included consideration of the April 1, 2025, Environmental Hearing Board Adjudication on the appeal of DEP's approval of KSL's Phase III Expansion Major Modification Application. This adjudication remanded the Phase III permit modification back to the Department for further consideration. The remand specifically required the Department to consider whether additional conditions or modifications to Keystone's Phase III permit modification or its operating plans are necessary to further control and mitigate offsite odors and excess leachate generation. The remand also

required the Department to revise the existing harms-benefits analysis to include a consideration of any new plan amendments and permit conditions that the Department may decide are appropriate on remand.

A primary remedy to control odors from KSL's leachate lagoons was the construction and commencement of operation of two 2.5 million-gallon enclosed leachate storage tanks. KSL just recently commenced operation of these tanks in the beginning of September. KSL also, just recently, commenced operation of an odor control system for the leachate treatment plant. The Department needs sufficient time to determine if these odor mitigation measures have fully mitigated the offsite odor concerns and to reevaluate the harms-benefits analysis.

KSL has also implemented numerous leachate generation minimization measures at the facility and while KSL has been in compliance with the Department's leachate storage regulations since these measures were implemented, this additional time will enable the Department to confirm that this concern is fully addressed.

If the terms of the permit extension are not complied with, it is not guaranteed that this permit term will be extended again. In that event, KSL may have to prepare to cease all operations at the site and commence closure activities.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board) pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa. C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at www.ehb.pa.gov or by contacting the Secretary to the Board at 717-787-3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR

FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions regarding this matter, please contact Bradley Lester at bralester@pa.gov or 570-820-4841.

Sincerely,

Roger Bellas

Roger Bellas
Program Manager
Waste Management Program

Enclosure: Form 13-A

cc: David Osborne (via email: davido@kslco.com) (w/ enc.)
Dunmore Borough (via email: greg.wolff@dunmorepa.gov) (w/ enc.)
Throop Borough (via email: lcimini@throopboro.com) (w/ enc.)
Lackawanna County Planning Commission (via email: donatoml@lackawannacounty.org) (w/ enc.)
Lackawanna County Commissioners (via email: reedlo@lackawannacounty.org, castellani@lackawannacounty.org, koruszkoa@lackawannacounty.org) (w/ enc.)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT**FORM NO. 13-A**
MODIFICATION TO SOLID WASTE DISPOSAL AND/OR PROCESSING PERMIT

Under the provisions of Act 97, the Solid Waste Management Act of July 7, 1980, Solid Waste Permit
Number 101247 issued on (date original permit was issued) May 23, 1990 to
(permittee) Keystone Sanitary Landfill, Inc.
(address) 249 Dunham Drive
Dunmore, PA 18512

is hereby modified as follows:

This permit modification is issued to allow for the short-term, continued operation of the Keystone Sanitary Landfill under the previously permitted terms and conditions during the pendency of the review of the ten-year renewal application, APS ID# 1111148, AUTH ID# 1479927 ("Permit Renewal"). This action is taken to provide sufficient time for the Department to complete the renewal application review process and to consider the Environmental Hearing Board Adjudication on the appeal of the Department's approval of Keystone Sanitary Landfill's Phase III Expansion Major Modification Application. This short-term modification of the permit shall be granted until December 31, 2026, unless this short-term extension is revoked, or a final action on the renewal application is taken sooner.

All conditions of the attached modification shall modify conditions in the original permit and subsequent modification to the original permit. Conditions contained herein that reference "permit" refer to the hereby-amended permit.

Nothing herein shall be construed to supersede, amend, or authorize violation of provisions of any valid and applicable local law, ordinance, or regulation provided that said law, ordinance, or regulation is not pre-empted by the Pennsylvania Solid Waste Management Act, of July 7, 1980, Act 997, 35 P.S. 60118.1010, et. seq.

1. This operating permit allows Keystone Sanitary Landfill, Inc. to continue to operate this facility per the existing terms and conditions of DEP Permit No. 101247 until December 31, 2026. No construction or operational changes are authorized by this action except as explicitly identified in this permit modification.

This modification shall be attached to the existing Solid Waste Permit described above and shall become a part thereof effective on (date) October 6, 2025.

Roger Bellas
FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION