



February 1, 2024

VIA E-MAIL: dano@kslco.com

Mr. Dan O'Brien, Business Manager
Keystone Sanitary Landfill, Inc.
249 Dunham Drive
Dunmore, Pennsylvania 18512

Re: Keystone Sanitary Landfill, Inc. (KSL)
KSL's Response to DEP's December 13, 2023 and January 8, 2024 Notices of Violation
PADEP Permit No. 101247
Dunmore and Throop Boroughs, Lackawanna County

Dear Mr. O'Brien:

The Department of Environmental Protection ("DEP") has received and reviewed KSL's responses to DEP's December 13, 2023 and January 8, 2024 Notices of Violation. While KSL's responses contained viable and comprehensive mitigation measures, after evaluating these responses and meeting with KSL representatives on site on January 24, 2024, DEP has determined that additional, more immediate, odor mitigation measures need to be implemented. DEP discussed several of these potential mitigation measures with KSL during the January 24, 2024 site meeting. Specifically, DEP is requesting the following information:

- More specific information regarding the use of temporary geomembrane capping materials is needed. In KSL's response, KSL requests that DEP immediately approve the installation of temporary geomembrane liner to assist in controlling potential odors within active areas of the landfill. While DEP agrees that the use of these types of temporary capping materials can be very effective at controlling landfill gas emissions and minimizing leachate generation, DEP requests that KSL provide additional information regarding the type of geomembrane being proposed, the areas where the temporary geomembrane would be utilized and, moving forward, the conditions that would prompt the installation of this material.
- During the January 24, 2024 meeting, DEP expressed concerns regarding the timeliness with which some of the proposed mitigation measures can be implemented; specifically, the use of geomembrane capping materials. DEP understands that installation of both temporary and final cap can be impacted by weather conditions typically experienced in the winter. KSL indicated in its NOV responses that final capping of approximately 25 acres of intermediate cover can be achieved by May 2024. While DEP acknowledges that KSL has completed significant work installing additional landfill gas collection devices at the site, DEP continues to detect offsite landfill gas odors and continues to receive a high volume of odor complaints. A more immediate mitigation measure needs to be implemented to enhance the gas collection system's ability to capture landfill gas escaping from the intermediate cover areas. KSL discussed additional, more immediate

capping options during the January 24, 2024 site meeting. Two options discussed were a spray-on latex-based capping material and a posi-shell material. Please provide additional information regarding any onsite testing of the products and where and when the materials could be utilized.

- During the January 24, 2024 site meeting, KSL informed DEP that the proposed odor mitigation of applying foam to the surface of the leachate in the lagoons had not yet been implemented. KSL should provide an update on the use of foam to minimize odors from the lagoons.

Please provide the information requested above within 5 business days of receipt of this letter. If you have any questions, please contact me at 570-826-2201 or at rbellas@pa.gov.

Sincerely,

Roger Bellas

Roger Bellas
Program Manager
Waste Management Program

cc: Dominick DeNaples, Keystone Sanitary Landfill, Inc. (via e-mail: dominickd@kslco.com)