Pennsylvania
Department of
Environmental Protection

July 18, 2025

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

Re: Permit Renewal
Keystone Sanitary Landfill
Permit #: 101247
APS ID#: 1111148, AUTH ID#: 1479927
Throop and Dunmore Boroughs, Lackawanna County

Dear Mr. DeNaples:

The Department of Environmental Protection (DEP) has reviewed the above referenced Permit Renewal application and the April 1, 2025, Environmental Hearing Board Adjudication on the appeal of DEP's approval of Keystone Sanitary Landfill's (KSL) Phase III Expansion Major Modification Application, which remanded the major modification back to DEP for further consideration. The DEP has identified the following:

General Information Form

- Please complete the General Information Form to include all relevant information (e.g. number of employees to be present, type of organization, all facility ID's issued by the Department.)

Form HW-C

- Section D is missing the November 21, 2023 Suspension of Settlement Accommodation Plan Operations. Permit suspensions in the last 10 years are to be included on the form and permittees are specifically required to state the reasons for suspension as well as the date, location, nature of the violations, issuing agency, dollar amount of any monetary penalty and permit number. Please provide an updated spreadsheet including the permit suspension and the missing information.
- There are enforcement actions issued by Mine Health and Safety Administration (MSHA) that are be missing from the list in Section D that should be included as follows:

Keystone Quarry, Inc. (Mine ID # 3608726)

Citation/Order #	Date Issued
9712120	08/02/22
9712121	08/02/22
9712122	08/03/22

Maco Associates, Inc. (Mine ID #3608406)

Citation/Order #	Date Issued
8005340	05/09/22
8005518	10/17/22

Form 46

- Northampton County Municipal Waste Process/Disposal Capacity and Integrated Waste and Recyclables Management Service Agreement (Northampton County Agreement) references Commonwealth Environmental Systems in section 12.2 Notices. Please provide a revised Northampton County Municipal Waste Process/Disposal and Integrated Waste and Recyclables Management Service Agreement identifying KSL.

- Northampton County Agreement preamble paragraph is undated. Please provide an updated Northampton County Agreement with a date.

Condition 25 Requirement of Major Modification Phase III, Paragraph F

- Leachate Generation
    - 2024 Average Generation of Leachate (excluding January 2024 – no data submitted to the Department) was approximately 227,000-gallons per day.
    - Response to Second Technical Deficiency Letter for Phase III Expansion Modification states that maximum generation of leachate for Phase III expansion (only Pads 1 – 7, not including any other portion of the landfill (Phase II, Tabor, Logan, and Keystone-Dunmore) is 127,644-gallons per day.
    - Renewal application states that for Phase III, Pad 8, and for all other portions of the landfill, the maximum leachate generation rate is 127,644-gallons per day.
    - Please provide a reevaluation of the maximum leachate generation rate in light of Reverse Osmosis (RO) concentrate disposal within the landfill, and the Tabor Landfill having excess leachate generation during rain events. Additionally, the HELP model is not consistent with observed conditions.
        - The Tabor Landfill has shown an increase in leachate production following rain events in 2023 (Reference 1: "Report on Metering Plan and Impacts of Rain On Leachate Generation May 2023 to December 2023", submitted to the Department on April 30, 2024) and 2025 (Reference 2: April 21 – May 9, 2025 flow data provided by KSL to the Department on May 14, 2025.)
        - KSL disposes of RO reject in the working face of the landfill. The amounts range from approximately 20,000-gal/day (April 2024) to approximately 67,000-gal/day (January 2025). These values are less than the permitted amount for slope stability, pooling, and free draining conditions.

        - Please provide an analysis of the effects that these aforementioned conditions have had on leachate generation.
        - In Reference 1 it is stated "Monthly surface monitoring data…will be utilized to help identify any possible stormwater infiltration from terraces, gas well boots, cleanouts within capped areas." Please provide any monitoring results from these efforts.
        - Please provide either a revised HELP model or an explanation of why the HELP model provided is inconsistent with observed conditions and what is being done to bring observed conditions in line with the HELP model.

- Pursuant to the March 29, 2024, Consent Order and Agreement between KSL and the Department, KSL shall perform an evaluation of leachate generation in an effort to reduce excess leachate generation and stormwater infiltration. On April 30, 2024, KSL submitted a document including recommendations on reducing stormwater infiltration and excess leachate generation.
    - Please provide information regarding any actions taken, to include any results or data gathered following any actions taken.
    - Please provide data showing the effect the use of rain tarp and capping has had on the overall leachate generation rates.
    - Please provide a plan on how stormwater will be managed in areas where temporary cap or rain tarp installation has occurred upgradient of intermediate cap or active fill areas.

RO Concentrate Management

- Presently KSL disposes of RO concentrate (amounts range from approximately 20,000-gal/day (April 2024) to approximately 67,000-gal/day (January 2025) in the working face.
    - Please provide data showing the impact this has had on the quality of the leachate, RO efficiency, and leachate odors.
    - Please provide plans to reduce the volume of RO concentrate being generated and the reduction or elimination of RO concentrate disposed of onsite. Include any details regarding the impact the addition of hydrogen sulfide (H_2S) scavenger to the leachate and RO concentrate has had on odor generation.
    - Please provide data showing the impact the hauling of RO concentrate offsite has had on leachate generation rates, quality of the leachate, RO efficiency, and leachate odors.

- Due to the RO units being installed after the completion of the Harms/Benefits Analysis for the Phase III Expansion, the impact the generation and management of the RO concentrate had on potential harms was not evaluated. KSL should identify and fully describe the impact generation and disposal of RO concentrate has on potential harms and describe proposed mitigation for these impacts. Potential harms impacted could include, but may not be limited to, slope stability,

leachate generation rates, leachate quality (if disposed of at KSL), odors, and truck traffic (if disposed of off-site.)

Odor and Landfill Gas Management

- Please provide a plan to address odors from the leachate treatment plant.

- Please reevaluate the planned use of horizontal gas collection devices as part of the overall gas collection system.
    - This should include the use of shallow horizontal gas collection devices at:
        - The edge of capped areas and cap anchor trenches.
        - Along haul roads within the waste placement area.
    - This should also include the use of engineered horizontal gas collectors between lifts, especially in areas where plateaus will be established and in place for longer than 12-months.

- Please reevaluate and propose improvements on the enhanced surface monitoring protocols and overall NMCP.

- Please reevaluate the maximum acreage of intermediate cap that can be properly managed for odor control and leachate management.
    - Currently KSL has proposed to maintain intermediate capped areas to less than 55 acres. Please reevaluate in an effort to minimize the maximum area of intermediate cap particularly to minimize potential offsite landfill gas odors.
    - This "maximum acreage of intermediate cap" can exclude any areas where rain tarp has been installed directly on top of protective coverage as long as appropriate measures are in place to minimize the potential of landfill gas migration into these areas through the leachate conveyance piping and rain tarp/intermediate cap interface.

Air Quality

- PADOH and ATSDR Health Consultation Report
    - KSL should perform another round of comprehensive air monitoring and enhanced onsite underground gas migration monitoring once the updated air monitoring plan is approved.

Clarification of Benefit

- PennDOT determined that the U.S. 6 (Casey Highway) was no longer eligible for adoption under the PA Adopt a Highway program, KSL has provided the Department with correspondence from PennDOT regarding PennDOT proposing alternative options for PA Adopt a Highway cleanup.
    - KSL should select an alternative given by PennDOT allowing participation in the Adopt-a-Highway program or an alternative roadway. KSL should also continue to monitor and clean-up the U.S. 6 (Casey Highway) as this was an approved mitigation measure of litter blowing from the landfill.

Please submit a response within 60 calendar days.

If you believe that any of the items stated are not significant, instead of submitting a response, you have the option of asking the DEP to decide based on the information that you have already made available. If you choose this option, you should explain and justify how your current submission is satisfactory. Please keep in mind that if you fail to respond, your application may be denied.

Should you have any questions, please contact Bradley Lester at (570) 820-4841.

Sincerely,

David F. Matcho

David F. Matcho, P.E.
Environmental Engineering Manager
Waste Management Program

cc: Dunmore Borough (w/enc.) email: greg.wolff@dunmorepa.gov.
Throop Borough (w/enc.) Email: lcimini@throopboro.com