



October 30, 2023

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.
PADEP Permit No. 101247
Recent Odor Complaints
Dunmore and Throop Boroughs, Lackawanna County

Dear Mr. O'Brien:

Over the last month and a half, the Department of Environmental Protection ("DEP") has received well over 100 odor complaints related to Keystone Sanitary Landfill, Inc. ("KSL"). While DEP's response to these complaints has not resulted in the identification of a malodor with the complainants, DEP staff have regularly observed landfill related odors off KSL's property. Specifically, strong landfill gas odors have been observed along Marshwood Road, the Casey Highway, and Interstate 81.

Rob Laczi, Solid Waste Specialist, recently completed an inspection of KSL on October 19, 2023. As part of that inspection, Rob requested KSL submit copies of recent enhanced surface monitoring results to the Department. In response to this request, KSL submitted the results of monitoring conducted in August and September. A review of these results, along with a review of the monitoring results from July and October, indicates that surface methane emissions in the scan areas has gotten progressively worse. As you are aware, the Phase III expansion approval requires KSL to monitor areas of intermediate cover monthly, evaluate the results of this monitoring and take mitigation measures to prevent excessive landfill gas emissions that may lead to offsite odors. Specifically, Condition 20 reads:

20. In conjunction with the odor mitigation practices approved in the Phase II Western Boundary Adjustment Permit Modification issued on June 10, 2013 and currently being utilized, KSL shall also implement additional odor mitigation practices contained in the approved Nuisance Minimization and Control Plan (NMCP) submitted as part of the Phase III permit application. These measures include, but are not limited to:

- a. For intermediate slopes in place for 6 months or upon the completion of the initial sixty-foot lift, whichever comes first, KSL will initiate enhanced surface monitoring on these slopes. Evaluation of the results of this monthly surface monitoring will be evaluated to determine if additional gas mitigation efforts need to be implemented as per the NMCP. (Mitigation measures include, but are not limited to the addition and compaction of clay like soils, adjustments to existing*

gas collection devices and/or construction of additional gas collection devices, prompt mitigation of any leachate break outs, installation of geosynthetic cap, etc.)

- b. When intermediate slopes are in place for twelve months, KSL will deploy temporary geosynthetic cap that meet closure cap standards including cover soils and vegetative stabilization.*

KSL's NMCP states:

Keystone will trigger emission reduction efforts if the surface scan threshold of 500 ppm is exceeded or an increase in concentration is observed during the monthly review interval.

Based on DEP's review of the monthly surface scans, it is apparent that both of the triggers above were met. Therefore, please provide the following information within 5 days of receipt of this letter, so that DEP can determine if KSL has complied with its NMCP:

- 1.) Electronic copies of all surface scans conducted since July 2023. (If not obvious, KSL should provide the acreage covered by each scan.)
- 2.) A narrative detailing the evaluation conducted on the data to show whether the results triggered KSL to initiate emission reduction efforts.
- 3.) If the evaluation triggered emission reduction efforts, provide a narrative of all of the efforts conducted for each area that triggered the emission reduction efforts.
- 4.) Identify any areas where intermediate cover has been in place for twelve months or more.

Regardless of DEP's determination of compliance with the NMCP, KSL should immediately consider additional mitigation measures to minimize offsite odors, as it is apparent to DEP that KSL's current mitigation measures have not been effective.

Sincerely,

Roger Bellas

Roger Bellas
Program Manager
Waste Management Program

cc: Dominick DeNaples, Keystone Sanitary Landfill, Inc. (via e-mail: dominickd@kslco.com)
Dunmore Borough (via e-mail: greg.wolff@dunmorepa.gov)
Throop Borough (via e-mail: lcimini@throopboro.com)