



November 30, 2023

Roger Bellas  
Program Manager  
Waste Management Program  
PA Department of Environmental Protection  
2 Public Square  
Wilkes Barre, PA 18701

**Re: Suspension of Settlement Accommodation Plan Operation**

Dear Mr. Bellas:

The purpose of this correspondence is to respond to PADEP's request to provide a mitigation plan to control landfill gas odors emanating from the SAP areas. However, before presenting the information requested, Keystone offers the following comments:

- Keystone respectfully disagrees with, and reserves all rights with respect to, the findings set forth in the Department's November 21, 2023 letter.
- KSL is confident that we remain compliant with its current Nuisance Minimization and Control Plan, a Plan that is on file with and approved by PADEP.
- As stated in the DEP correspondence, DEP staffers have routinely detected landfill related odors off Keystone's property on I 81, the Casey Highway and Marshwood Road – all nonresidential areas.
- The vast majority of the "hundreds of odor complaints from residents" originated from residential neighborhoods surrounding the landfill but DEP inspectors have not confirmed the presence of Landfill-related odors during the most recent onslaught of complaints.
- DEP inspectors spend hours each and every day patrolling the surrounding areas. Keystone assumes that these inspectors are positioned so they can immediately respond to incoming odor complaint calls as well as file reports detailing their own observations. Keystone has not seen these reports but can only assume Keystone would have been contacted if a malodor was detected in a residential neighborhood.
- The public in general is not qualified to either identify a specific odor or make a determination as to the origin of the odor and yet the conclusion is always the same – "It has to be the landfill." Keystone has identified numerous business operations, infrastructure performance issues, marshes and poorly maintained drainage ponds in the immediate area that produce odors, some on a regular basis.

## Keystone's Mitigation Plan

Immediately after a telephone conversation with the Department on 10-25-23 Keystone officially suspended SAP operations. Keystone recognizes that certain required tasks and activities performed by Keystone in addition to the SAP operations, such as final capping and associated anchor trenches, repairing/replacing vacuum lines, raising stone columns, vertical well drilling also have the potential to generate odors. In order to eliminate any odors specifically coming from the SAP area, Keystone has commenced completion of the following items:

- **Horizontal Collection Wells**  
To date Keystone has installed five (5) horizontal collection wells in the area of concern. More of these collection devices will be installed as needed.
- **Re-Establishment of Vacuum Headers**  
Areas of limited or low vacuum will be identified and new headers will be run to restore sufficient available vacuum to wells that require repairs.
- **Additional Gas Extraction Wells**  
Keystone is scheduled to commence drilling for new gas extraction wells on Thursday, November 30, 2023.
- **Soil Placement, Grading and Compaction**  
Keystone has completed the placement of approved soil cover material, grading and compacting the area of concern. To date over 20,000 tons of approved material have been placed over the SAP area.
- **Anchor Trench**  
The anchor trench, which contributed to the exceedances detected by PADEP staff, has been backfilled.
- **Final Closure Activities**  
Keystone will implement all final closure activities associated with the transitional portion of the SAP area. A Phase II Final Closure Form 37 as-built submission will follow accordingly. Due to the pending weather constraints, it is anticipated that the ongoing final capping event may not be completed until the spring of 2024.

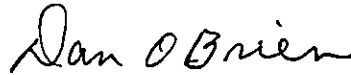
In the meantime, Keystone will aggressively monitor the area, tune wells as needed, monitor available vacuum, and maintain the integrity of the cover materials and complete the installation of the new gas wells.

Keystone also wants the Department to know that all six grids located within the SAP were rescanned with TVA after soil placement and the horizontal collector installation/tuning and none no longer have exceedances as shown below.

R31	11/14/23	8855	11/24/23	32.3
R32	11/14/23	1.5%	11/24/23	45.6
R33	11/14/23	6570	11/24/23	117
R34	11/14/23	2.2%	11/24/23	87
R35	11/14/23	5600	11/24/23	99
R36	11/14/23	16%	11/24/23	397

Keystone, as always, appreciates the Department's guidance and will continue its efforts to reduce emissions from the SAP area.

Sincerely,



Dan O'Brien  
Business Manager