

October 2, 2026

Certified Mail No.: 7020 1810 0001 1892 9490

Jonathan T. March, P.E.
F.R.&S., Inc.
727 Red Lane Road
Birdsboro, PA 19508
jon.march@jpmascaro.com

Re: Major Permit Modification
Cells 8-14 Expansion
Pioneer Crossing Landfill
Permit ID No. 100346
APS No. 1112895
Authorization No. 1483599
Exeter Township, Berks County

Dear Jonathan T. March:

Enclosed is a major permit modification to Solid Waste Permit No. 100346 for the operation of Pioneer Crossing Landfill, issued in accordance with Article V of the Solid Waste Management Act, 35 P.S. Sections 6018.101, et seq.

This permit modification approves the Cells 8-14 expansion at Pioneer Crossing Landfill.

Compliance with the terms and conditions set forth in the permit is mandatory. Please note that issuance of this permit does not eliminate the necessity to comply with all federal, state, or local requirements at the permitted facility. You have the right to file an appeal as to these terms and conditions.

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
301 Fifth Avenue
Suite 310 – Piatt Place
Pittsburgh, PA 15222

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 <http://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 about the enclosed permit or requirements of the Solid Waste Management Act, please call Domenico Tuzzato, Permits Section Chief, at 717.705.4908.

Sincerely,

Carrie A. Fleming

Carrie A. Fleming
Program Manager
Waste Management Program

cc: Exeter Township Supervisors
Berks County Planning Commission
Ryan K. Inch, P.E., Director of Engineering, FR&S, Inc. (ryan.inch@jpmascaro.com)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTE MANAGEMENT PROGRAM
SOUTHCENTRAL REGION

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, as amended, Solid Waste Permit Number 100346 issued on December 17, 1993 to:

FR & S, Inc.
727 Red Lane Road
Birdsboro, PA 19508
Exeter Township, Berks County

is hereby modified as follows:

This modification approves the facility expansion including cells 8-14 at Pioneer Crossing Landfill.

This permit modification is based upon the following permit application documents:

1. Application for Major Permit Modification, prepared by FR & S Inc., received by DEP on March 1, 2024, consisting of the following:

Volume I

GIF, General Information Form
Form A, Application for Municipal Waste Permit
Form B, Professional Certification
Form B1, Application Form Certification
Form C1, Compliance History
Form E, Contractual Consent of Landowner
Form D, Environmental Assessment
Form G(A), Air Resources Protection
Form G(B), Air Resources Protection
Form H, Revegetation
Form K, Gas Management
Form L, Contingency Plan for Emergency Procedures
Form X, Radiation Protection Plan
(continued on page 2)

This modification shall be attached to the existing Solid Waste Permit described above and shall become a part thereof effective on October 2, 2026.

Carrie A. Fleming

FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION

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- Form 1, Facility Plan
Form 2, Map Requirements – Phase I
Form 11, Mineral Deposits – Phase I
Form 12, Alternative Water Supply
Form 14, Operation Plan – Phase II
Form 24, Liner System – Phase II
Form 28, Closure/Post-Closure Land Use Plan
Form 45, Protection of Capacity
Form 46, Relationship Between Municipal Waste Management Plans and
Permits
Form 54, Background Meteorological Monitoring
Volume II
Form I, Soil Erosion and Sedimentation Control
Form 8, Baseline Groundwater Analysis – Phase I
Volume III
Form F, Soils – Phase I
Form J, Soils – Phase II
Form 6, Geological Information
Form 7, Hydrogeological Information
Form 18, Water Quality Monitoring System – Phase II
Form 25, Leachate Management – Phase II
Application Plan Set
Sheet Set 001 – 007
2. Revised Application provided by FR&S, Inc on April 29, 2024, consisting of the following:
Volume I
GIF, General Information Form
Form A, Application for Municipal Waste Permit
Form B, Professional Certification
Form B1, Application Form Certification
Form C1, Compliance History
Form E, Contractual Consent of Landowner
Form D, Environmental Assessment
Form G(A), Air Resources Protection
Form G(B), Air Resources Protection
Form H, Revegetation
Form K, Gas Management
Form L, Contingency Plan for Emergency Procedures
Form X, Radiation Protection Plan
(continued on page 3)

Form 1, Facility Plan
Form 2, Map Requirements – Phase I
Form 11, Mineral Deposits – Phase I
Form 12, Alternative Water Supply
Form 14, Operation Plan – Phase II
Form 24, Liner System – Phase II
Form 28, Closure/Post-Closure Land Use Plan
Form 45, Protection of Capacity
Form 46, Relationship Between Municipal Waste Management Plans and
Permits

Form 54, Background Meteorological Monitoring

Volume II

Form I, Soil Erosion and Sedimentation Control

Volume III

Form 8, Baseline Groundwater Analysis – Phase I

Form F, Soils – Phase I

Form J, Soils – Phase II

Form 6, Geological Information

Form 7, Hydrogeological Information

Form 18, Water Quality Monitoring System – Phase II

Form 25, Leachate Management – Phase II

Application Plan Set

Sheet Set 001 – 007

3. Response to the Department's Administrative Review Letter, received May 23, 2024, consisting of the following:

Comment Response Letter

Attachment 1 – Proof of Public Notice

Application Volumes I, II & III

Revised Form 7, Hydrogeologic Information

4. Additional information received September 3, 2024, consisting of the following:

Waste Relocation and Cell Sump Reconfiguration Plan

Part 1 - Landfill Expansion Schedule

Revised Sheet Set 004

Sheet Set 004.1

5. Response to the Department's 1st Environmental Assessment Review Letter, received November 20, 2024, consisting of the following:

Comment Response Letter
Application Volumes I, II & III
Revised Forms 1, 2, 6, 7, 12, 45, 46, 54, D, F, and I
Plan Sheet Set 000

6. Response to the Department's 2nd Environmental Assessment Review Letter, received February 13, 2025, consisting of the following:

Comment Response Letter
Attachments:
1. Appendix H of Form D narrative (revised Traffic Study)
2. Revised Form 12 – Alternative Water Supply Phase I
3. Revised Form D Environmental Assessment narrative with Harms Benefit and tables (Appendices not included - no changes to Appendices other than Appendix H, revised Traffic Study).
4. Revised Form 6 – Geologic Information Phase I (prepared by ARM Group)
5. Revised Form 7 – Hydrogeologic Information Phase I (prepared by ARM Group)

7. Additional information received June 5, 2025, consisting of the following:

Letter from Ryan Inch
Appendix K Wetland Mitigation Plan
Appendix K Wetland Mitigation Plan Drawings

8. Response to the Department's 3rd Environmental Assessment Review Letter, received September 11, 2025, consisting of the following:

Comment Response Letter
Attachments:
1. Revised Form D package
2. Revised Form 12
3. Revised Form 7
4. ARM Group's July 17, 2025 letter to DEP Waterways and Wetlands

9. Additional information received March 20, 2026, consisting of the following:

Letter from Jonathan March regarding incorporation of the DEP Chapter 105 permit plan changes into the DEP Waste Management application
Revised Volumes I, II & III
Revised Application Plan set

10. Additional information received July 2, 2026, consisting of the following:

Letter from Ryan Inch regarding shallow composite high groundwater vs subgrade elevation
Drawing Sheets 1-3 of Sheet set 000

11. Additional information received July 6, 2026, consisting of the following:

Letter from Ryan Inch regarding the proposed waste relocation plan
Waste Relocation and Cell Sump Reconfiguration Plan
Sheet Set 001
Sheet Set 003.1
Sheet Set 003.2
Sheet Set 003.P1P2
Sheet Set 004
Sheet Set 007

12. Additional information received July 8, 2026, consisting of the following:

Revised Sheets 1-3 of Sheet Set 000

13. Response to the Department's 1st Technical Review Letter, received August 24, 2026, consisting of the following:

Comment Response Letter
Attachment 1: Revised Form A and Form 1
Attachment 2: Revised Form L
Attachment 3: Revised Form 12, Alternative Water Supply
Attachment 4: Revised Form 14, Operations Plan
Attachment 5: Revised Form 24, Liner System
Attachment 6: Revised Form 28, Closure/Post-Closure
Attachment 7: Revised Form I, Soil Erosion and Sedimentation Controls
Attachment 8: Revised Form 25, Leachate Management Plan
Attachment 9: Revised Form 18, Water Quality Monitoring System
Attachment 10: Revised Form 7, Hydrogeologic Information
Attachment 11: Revised Full Drawing Set

14. Response to the Department's 2nd Technical Review Letter, received September 29, 2026, consisting of the following:

Comment Response Letter
Attachment 1: Revised Form 18 – Water Quality Monitoring System (Phase II) –
Attachment 2: Leachate Witness Pipe (LWP) Analytical Results – PADEP Form
19 Results, Second Quarter 2023 through First Quarter 2024
Attachment 3: Form 24: Liner System – Phase II – Historical Interface Direct
Shear Test Results (Table 1)
Attachment 4: Form 28: Closure/Post-Closure Land Use Plan – Revised Bond
Worksheets and Supporting Narrative
Attachment 5: Form I: Soil Erosion and Sedimentation Controls – PADEP
Standard E&S Worksheet #1 (Compost Filter Sock)
Attachment 6: Form 25: Leachate Management – Phase II – Response to
Comment J.1: Leachate Generation Estimates and Storage Basin Volume
Attachment 7: Revised Sheet Set 008 – Sheet No. 8

15. Response to the Department's 3rd Technical Review email, received October 1, 2026, consisting of the following:

Comment Response email
Revised Bond Worksheets

Permit Conditions:

1. FR&S, Inc. shall submit to the Department a revised Water Quality Monitoring Plan which satisfies the Department's review comments within 30 days of issuance of this permit modification.
2. Prior to construction of the future leachate storage basin, and the decommissioning of the existing leachate storage basin and storage tanks, FR&S, Inc. shall re-evaluate the current and estimated facility leachate generation rates to confirm the necessary storage volume and provide that evaluation for Department review. If it is determined that changes to the approved Leachate Management Plan are necessary, FR&S, Inc. shall submit those changes as a permit modification for Department review.
3. Prior to each additional stage of waste excavation and leachate sump reconfiguration, FR&S, Inc. shall submit a permit modification to the Department which includes at a minimum, but not limited to, the following:
 - a. Waste excavation and relocation plans
 - b. Proposed intermediate grade plan and confirmation of slope stability
 - c. Interim stormwater management plans
 - d. Project specific nuisance control plans
 - e. Changes to leachate sump and collection design
4. FR&S, Inc. shall submit additional bond to meet the total amount of \$24,669,444 within 30 days of issuance of this permit.
5. Any final operation, design, or other plan developed subsequent to permit issuance which exhibits changes in the structures, locations, specifications, control measures or other changes of substance shall be submitted to the Department for subsequent permit action. Any deviation of plans herein approved shall not be implemented before first obtaining a permit modification or written approval from the Department.
6. Nothing herein shall be construed to supersede, amend or authorize violation of the provision of any valid and applicable law, ordinance or regulation, provided that said local law, ordinance or regulation is not preempted by the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. § 6018.101, et seq.