

February 15, 2019

Keystone Sanitary Landfill  
Mr. Dan O'Brien, Business Manager  
249 Dunham Drive  
Dunmore, PA 18612-2686

Re: Nuisance Odor and Mud Complaints  
Keystone Sanitary Landfill Permit#101247  
Dunmore and Throop Boroughs, Lackawanna County

Dear Mr. O'Brien:

The Pennsylvania Department of Environmental Protection ("Department") has been receiving numerous complaints relating to offsite landfill associated odors and to a lesser degree, mud and dirt on Dunham Drive. Odor complaints have been received from residents located in the Boroughs of Throop, Dunmore, Jessup and Olyphant, in the Townships of Jefferson and Roaring Brook and from the City of Scranton. Department staff responded to the complaints and although a malodor violation has not been determined to date, landfill associated odors have been detected at times at various locations in the surrounding area of Keystone Sanitary Landfill ("KSL").

Specifically, on February 4, 2019, six odor complaints were received afterhours by the Department. A member of the Emergency Response Team responded and during his investigation he detected a strong landfill odor along Marshwood Road in Throop Borough. Although the source of the odor at the landfill was not precisely determined, it is the Department's belief that the odor originated from KSL.

Also, on February 14, 2019 David Golobek, Solid Waste Specialist, and I visited KSL in an attempt to identify potential sources of odors and to evaluate the current odor mitigation measures being utilized by KSL. During our visit, we were able to identify areas that may be contributing to off-site odors. Specifically, we identified an area of intermediate slope above the newly-installed temporary cap in pad 10 and an area at the edge of final cap located between pads 9 and 10. While we believe KSL is in compliance with capping and landfill gas collection requirements and while we are also aware of the recent measures taken to enhance the intermediate cover in these areas, these areas should be further evaluated for the implementation of additional gas collection capability.

I am requesting that within ten (10) days of receipt of this letter, you should submit a plan and schedule to the Department that addresses the control and minimization of landfill associated odors. The Department suggests that enhanced landfill odor control measures as identified below, be considered as part of the overall odor control plan and potentially incorporated into KSL's Nuisance Minimization and Control Plan.

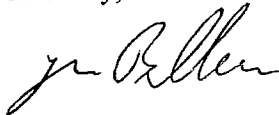
- Enhanced odor monitoring within the landfill permitted area and within the neighboring communities. The monitoring should include an analysis of the results of this monitoring that produces positive outcomes with the goal of less odors being detected offsite. Any action taken by KSL in this regard should be documented.

- The plan should include areas where planned placement of temporary synthetic cover material will be installed as dictated by onsite conditions and the June 13, 2013 Permit mod. The plan should also include an evaluation of a reduced daily working face if daily waste odors (such as putrescible waste or sewage sludge) are detected offsite.
- The plan may include the installation of additional gas collection wells or enhancements to the gas collection and destruction systems. Gas collection wells can be vertical, horizontal or temporary in nature.
- The plan should include information on current, planned and/or enhanced odor neutralization methods and practices that addresses odors at the working face, intermediate slopes and the leachate storage lagoons.

Also, a few complaints were received during the last few months regarding mud and dirt being tracked onto Dunham Drive and having an impact on vehicles that use the roadway. You should submit a plan that addresses the mitigation measures that will address this mud tracking issue. This plan should include an update on when the newly built vehicle tire wash system will be operational.

If you have any questions about this notice, please feel free to contact me at (570) 826-2201.

Sincerely,



Roger Bellas  
Program Manager  
Waste Management Program

cc: Dunmore Borough  
Throop Borough