

August 12, 2019
File No. 02219702.00

Mr. Tom Farrell, Manager
Division of Solid Waste Enforcement
New Jersey Department of Environmental Protection
9 Ewing Street
Trenton, New Jersey 08625-0420

Mr. Jeffrey Meyer, Manager
Division of Air Enforcement
Bureau of Air Compliance and Enforcement
New Jersey Department of Environmental Protection
7 Ridgedale Avenue
Cedar Knolls, New Jersey 07927

Subject: August 11, 2019 Monitoring Station Data
Keegan Landfill
New Jersey Sports and Exposition Authority
Permit Activity Number: EIP190001
EA ID#: NEA 190001-13317

Dear Mr. Farrell and Mr. Meyer:

On August 11, 2019, NEXA, on behalf of the New Jersey Sports and Exposition Authority (NJSEA), notified the NJDEP hotline (1-877-WARNDEP) via phone that hydrogen sulfide (H₂S) gas measurements in excess of 30 ppb over a 30-minute period (rolling averages) were recorded at monitoring stations MS-2 and MS-3 at the Keegan Landfill (see Attachment 1). NJSEA made this notification, as required under the NJDEP-approved Monitoring Action Plan and Reference #11 of the subject Permit, for raw data collected from MS-2 and MS-3 on August 11, 2019 (see Attachment 2). We provide discussion and analysis of the data recorded at MS-2 and MS-3 below.

MONITORING STATION MS-2

The 30-minute rolling average H₂S concentration was in excess of 30 ppb between 3:57 am and 5:21 am at Monitoring Station MS-2 on August 11 (see raw data in Attachment 2). The hydrogen sulfide concentration, average wind speed and wind direction measured during the period of the exceedance are provided in Attachment 3. The average wind speed and direction were 2.5 mph and 253 degrees, respectively (i.e., from the west-southwest). The wind direction and MS-2 are shown on a map of the site. The nearest potential receptor is approximately 3,000 feet from the monitoring station (see Attachment 4).



MONITORING STATION MS-3

The 30-minute rolling average H₂S concentration was in excess of 30 ppb between 3:57 am and 5:06 am at Monitoring Station MS-3 on August 11 (see raw data in Attachment 2). The hydrogen sulfide concentration, average wind speed and wind direction measured during the period of the exceedance are provided in Attachment 3. The average wind speed and direction were 1.8 mph and 219 degrees, respectively (i.e., from the southwest). The wind direction and MS-3 are shown on a map of the site. The nearest potential receptor is approximately 3,500 feet from the monitoring station (see Attachment 4).

The cause of the emissions from Monitoring Stations MS-2 and MS-3 appears to be uncontrolled emissions from the Landfill. There was no corrective action implemented in accordance with the Odor Control Plan as the exceedances occurred overnight and returned to less than 30 ppb within approximately one hour (maximum). Construction of a landfill gas collection and control system (GCCS) has commenced. The GCCS is expected to be operational by September 17, 2019 to control emissions from the Landfill.

Please call either of the undersigned with any questions or comments.

Sincerely,



Christine H. Stokes
Project Manager
SCS Engineers



Lisa K. Wilkinson, PE
Project Director I
SCS Engineers

cc: G. Lugo, NJDEP (electronic copy)
A. Fontana, NJDEP (electronic copy)
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