

August 7, 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 6, 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 6, 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 station MS-2 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 on August 6, 2019 (see Attachment 2). We provide discussion and analysis of the data recorded at MS-2 below.

MONITORING STATION MS-2

The 30-minute rolling average H₂S concentration was in excess of 30 ppb at 3:54 am at Monitoring Station MS-2 on August 6 (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 wind speed and direction from 3:27 am through 3:45 am, the period when the individual H₂S measurements were greater than 30 ppb, averaged approximately 1.1 mph and primarily from the west. At time when the 30-minute rolling average exceeded 30 ppb, the winds appear to shift towards the landfill. The wind direction at the time of the 30-minute rolling average exceedance and



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the location of MS-2 are shown on a map of the site. The wind direction at the time of the 30-minute rolling average is towards the landfill (see Attachment 4).

Based on the change in wind direction (toward the Landfill) at the time when the 30-minute rolling average exceeded 30 ppb, we do not expect offsite impacts from this exceedance. Therefore, there was no corrective action implemented in accordance with the Odor Control Plan. In addition, the exceedance occurred overnight and returned to less than 30 ppb within 5 minutes. 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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Due to large size of this file, attachments are not posted but are available upon request by emailing info@njsea.com

