

November 5, 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: November 3 and 4, 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 November 3 and 4, 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 (H<sub>2</sub>S) 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 these notifications, 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 November 3 and 4, 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 H<sub>2</sub>S concentration at Monitoring Station MS-2 was in excess of 30 ppb for intermittent periods between 12:09 am and 7:03 am on November 4 (see NEXA notifications in Attachment 1 and raw data in Attachment 2). The hydrogen sulfide concentration, average wind speed and wind direction measured during the period of the exceedances are provided in Attachment 3. The average wind speed and wind direction during the intermittent periods was 0.9 mph and 251 degrees (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 H<sub>2</sub>S concentration at Monitoring Station MS-3 was in excess of 30 ppb between 10:42 pm and 11:30 pm on November 3 (see NEXA notifications in Attachment 1 and raw data in Attachment 2). The hydrogen sulfide concentration, average wind speed and wind direction measured during the period of the exceedances are provided in Attachment 3. The average wind speed and wind direction was 0.8 mph and 274 degrees (i.e., from the west). The wind direction and MS-3 are shown on a map of the site. The nearest potential receptor is approximately 2,000 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 30 ppb around 7 am.

The landfill gas collection and control system (GCCS) installation is complete and commenced operation on September 5, 2019. The GCCS is being continuously monitored and adjusted to ensure efficient collection of landfill gas and to address specific exceedances at the monitoring stations. Additionally, we are working on the design of an expansion of the GCCS to the eastern side of 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  
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](mailto:info@njsea.com)

