

November 20, 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 19, 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 19, 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-1 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-1 on November 19, 2019 (see Attachment 2). We provide discussion and analysis of the data recorded at MS-1 below.

MONITORING STATION MS-1

The 30-minute rolling average H₂S concentration at Monitoring Station MS-1 was in excess of 30 ppb for intermittent periods between 4:30 am and 5:09 am on November 19 (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 calculated wind direction was 0.5 mph and 124 degrees (i.e., from the southeast). The wind direction and MS-1 are shown on a map of the site. The nearest potential receptor is approximately 500 feet from the monitoring station (see Attachment 4). However, we note that the wind direction measured at such low wind speeds was highly variable and therefore unreliable.



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The cause of the emissions from Monitoring Station MS-1 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 within less than one hour.


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 on 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)
T. Marturano, NJSEA (electronic copy)
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