

September 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: September 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 September 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 (H₂S) gas measurements in excess of 30 ppb over a 30-minute period (rolling averages) were recorded at monitoring stations MS-1 and 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-1 and MS-2 on September 4, 2019 (see Attachment 2). We provide discussion and analysis of the data recorded at MS-1 and MS-2 below.

MONITORING STATION MS-1

The 30-minute rolling average H₂S concentration was in excess of 30 ppb between 12:18 am and 3:33 am, and between 5:33 am and 6:03 am at Monitoring Station MS-1 on September 4 (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 wind direction were 1.3 mph and 212 degrees, and 3.7 mph and 210 degrees, respectively (i.e., from the south-southwest). The wind direction and MS-1 are shown on a map of the site. The nearest potential receptor is approximately 2,500 feet from the monitoring station (see Attachment 4).



MONITORING STATION MS-2

The 30-minute rolling average H₂S concentration was in excess of 30 ppb for intermittent periods between 1:12 am 4:15 am at Monitoring Station MS-2 on September 4, 2019 (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 wind direction was 1.1 mph and 223 degrees (i.e., from the 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).

The cause of the emissions from Monitoring Stations MS-1 and MS-2 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 three hours (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
SCS Engineers

cc: G. Lugo, NJDEP (electronic copy)
A. Fontana, NJDEP (electronic copy)
T. Marturano, NJSEA (electronic copy)
A. Levy, NJSEA (electronic copy)
C. Sanz, NJSEA (electronic copy)
J. Stewart, Lowenstein (electronic copy)
G. Castano, Castano Quigley (electronic copy)
L. Lim, NJDEP (electronic copy)
B. Farbanish, NJDEP (electronic copy)
J. Mattessich, NJDEP (electronic copy)

Due to large size of this file, attachments are not posted but are available upon request by emailing info@njsea.com

