May 9, 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. Jeffery 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: May 8, 2019 Monitoring Station Data
Keegan Landfill
New Jersey Sports and Exposition Authority
EA ID#: NEA 190001-13317

Dear Mr. Farrell and Mr. Meyer:

On May 9, 2019, the New Jersey Sports and Exposition Authority (NJSEA) notified the NJDEP hotline (1-877-WARNDEP) that one (1) hydrogen sulfide reading, in excess of 30 ppb over a 30-minute period, was recorded at monitoring station MS-1 at the Keegan Landfill (see Attachment 1). NJSEA made this notification, as required under the NJDEP-approved Monitoring Action Plan for Keegan Sanitary Landfill, for data collected from MS-1 on May 8, 2019 (see Attachment 2).

This writing is to confirm that there was no violation of N.J.A.C. 7:27-7.3 related to this data. MS-1 is located several hundred feet from the property boundary, as indicated on the enclosed map (see Attachment 4). Data from MS-1 does not indicate a violation of N.J.A.C. 7:27-7.3 at the property boundary. NJSEA made the report because it is required by the Monitoring Action Plan and not because it was a violation of N.J.A.C. 7:27-7.3.

MONITORING STATION MS-1

The 30-minute average of 32.5 ppb was recorded for Monitoring Station MS-1 on May 8 due to a spike of 140 ppb at 1159 (see raw data in Attachment 3). Of note, MS-1 was offline for the remainder of the day after the spike at 1159. Emilcott, the vendor for the monitoring stations, reported that, after the spike at 1159, the meter started to regenerate. The regeneration process caused the electrical breaker to trip. Attempts were made to restart the system but there appears to be an issue with the power system at that monitor. A new power inverter was ordered on May 8.

Attempts were made again this morning to restart the monitor. It ran for about 1 hour before shutting down again. It was determined that the computer crashed due to the power losses. The power inverter and a new computer were installed as of 1000, and the station is now operating.

Besides the electrical issues noted above, other conditions and data that cause us to question the accuracy of the reading of 140 ppb at 1159, are as follows:

1. MS-1 is located on the north side of the landfill (see plan in Attachment 4). The corresponding wind direction measured at the time of the reading of 140 ppb is east-northeast or from the direction of the freshwater marsh, not the Landfill.

2. NJSEA personnel were onsite just prior to the readings and reported no odors onsite.

3. Data for May 6 and May 7 is included in Attachment 5. This data generally shows that other increases in concentrations occur slowly over time, sustain for a short period, and have corresponding wind direction generally from southwest (i.e., from the area of the landfill previously estimated to have the highest H_2S emissions). There were no 30-minute averages over 30 ppb on May 6 or May 7.

MONITORING STATION MS-4

We note that MS-4 was offline from approximately 1249 to 1549 on May 8, 2019. Emilcott noticed the device was offline, while reviewing the system via the internet, and then mobilized to the site to investigate the issue. The power source breaker had tripped and the unit was unplugged. The power was restored at 1549 and the station operated for the remainder of the day.

ODOR COMPLAINTS

It is our understanding that odor complaints were received late yesterday evening. While we do not know the exact time or location of the complaints, we reviewed the data from monitoring stations MS-6, -7 and -8 from 1900 hours to 2200 hours (7pm to 10pm), which is summarized below (see Attachment 6):

1. MS-6: Wind direction generally ranged from south-southwest (from the direction of Bergen Avenue) to south-southeast (from the site entrance) during this time period. The maximum H_2S concentration was 1 ppb.

2. MS-7: Wind direction generally ranged from south-southwest to south (from the direction of the combine sanitary/stormwater ditch) during this time period. The maximum H_2S concentration was 3 ppb. Towards the end of this period, the wind shifted to the south-southeast and the H_2S concentrations were zero or 1 ppb.

3. MS-8: Wind direction generally ranged from east to east-northeast. The maximum H_2S concentration was 2 ppb. The H_2S concentration increased to 6 ppb after 2200 hours when the wind direction was from the northeast (from the direction of the marsh, not the landfill).

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

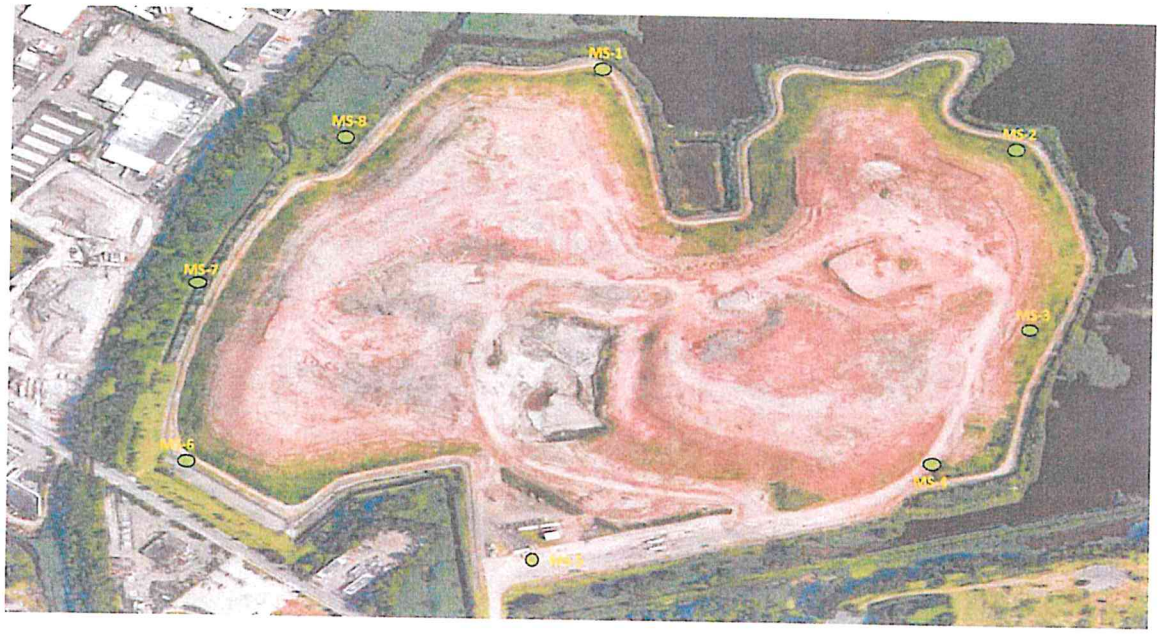
Sincerely,

Lisa K. Wilkinson
Project Director I
SCS Engineers

Gregory P. McCarron, PE
Project Director II
SCS Engineers

cc: L. Lim, NJDEP
T. Marturano, NJSEA
A. Levy, NJSEA
C. Sanz, NJSEA
J. Stewart, Lowenstein

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



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