

May 30, 2019
File No. 02219702.00

Mr. Tom Farrell, Manager (cover letter only)
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 Progress Report
Keegan Landfill
New Jersey Sports and Exposition Authority
EA ID#: NEA 190001-13317

Dear Mr. Farrell and Mr. Meyer:

On behalf of the New Jersey Sports and Exposition Authority (NJSEA), SCS Engineers (SCS) submits this monthly progress report as required by Section C of the Administrative Consent Order (ACO), NEA19001-13317 (executed on March 21, 2019) for the Keegan Landfill. This report summarizes the compliance status and activities performed since the previous progress report was submitted on April 30, 2019.

COMPLIANCE MEASURES AND STATUS

The work progress, summary of problems, activities planned, and required and actual completion dates for each ACO Condition is summarized in the table provided in Attachment 1. Further discussion of the difficulties encountered are provided below.

Difficulties Encountered

Monitoring station MS-1 did not meet the 85 percent valid data requirement for the partial week of May 8th (see Attachment 2). MS-1 was offline from May 8th at 11:59 through May 9th at 09:49 due to issues with the power inverter and the computer. These difficulties were previously reported to the NJDEP in a letter dated May 9, 2019.

As recommended by NJDEP personnel, monitoring station MS-5 was taken offline on May 10th at 11:40 am due to a sensor malfunction. A new meter was installed on May 14, 2019 and monitoring station MS-5 was operational as of 7:33 am. However, monitoring station MS-5 did not meet the weekly requirement of 85 percent valid data for the partial week of May 8th and the full week of May



12th (see Attachment 2). Backup meters are now held in stock by Emilcott for faster replacement should there be a meter failure.

Notifications were made to NJDEP on May 9, 15, 17, 18, 19, 22, 24 and 27 of exceedances of the 30 ppb for 30 minutes limit, based on monitoring station readings. Daily odor monitoring at the site in accordance with the Monitoring Action Plan (MAP) has not detected any specific areas of odors, stressed vegetation or other specific issues at the Landfill. Data review letters were submitted on May 9, 17 and 28 regarding the validity of the monitoring station data exceedances from May 9, 15 and 24 due to wind direction or pattern of readings. At times, the meters appear to record invalid readings. Further, elevated readings could be from sources other than the landfill. Data review will continue based on collection of additional data.

On Friday, May 24, 2019, Judge Jeffrey Jablonski, P.J. Chancery, Hudson County, issued temporary restraints in a legal action brought by the Town of Kearny against the NJDEP and NJSEA. The judge's order, among other things, included an immediate shut down of operations at the Keegan Landfill. The landfill has not operated since the afternoon of May 24, 2019. We note this because we anticipate difficulties managing odors without the ability to bring material to the site to cover areas, as necessary.

EXPLANATION OF NON-COMPLIANCE WITH ACO SCHEDULE

There were no periods of non-compliance with the ACO during the period of this progress report.

EVALUATION OF CORRECTIVE MEASURES IMPLEMENTED

Since the execution of the ACO on March 21, 2019, the corrective measures implemented include actions intended to minimize intake of the waste that may contain gypsum wallboard, placement of daily cover, placement of additional intermediate cover, and minimization of the surface area of the working face. Once again, we note that the landfill is currently not operating, nor has it operated since last Friday afternoon, therefore, it is not accepting any waste.

Mr. Tom Farrell and Mr. Jeffery Meyer

May 30, 2019

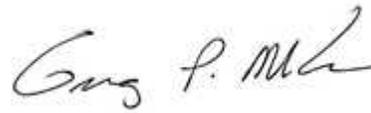
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A signed certification of information form is included in Attachment 3. The next report will be submitted on or before July 1, 2019. Please call either of the undersigned with any questions or comments.

Sincerely,



Lisa K. Wilkinson
Project Director I
SCS Engineers



Gregory P. McCarron, PE
Project Director II
SCS Engineers

cc: G. Lugo, NJDEP (hardcopy and electronic copy)
A. Fontana (electronic copy)
M. Gerchman (electronic copy)
S. Shah (electronic copy)
V. Prieto, NJSEA (electronic copy)
T. Marturano, NJSEA (electronic copy)
A. Levy, NJSEA (electronic copy)
C. Sanz, NJSEA (electronic copy)
J. Stewart, Lowenstein (electronic copy)
G. Castano (electronic copy)

Attachment 1

**May 2019 Progress Report Summary
Keegan Landfill (NEA190001-13317)**

No.	ACO Condition Description	B. Status of permitting, planning approvals and work progress	C. Difficulties Encountered	D. Activities Planned for next reporting period	E. Required and Actual Completion date
7.a	Submit Monitoring Action Plan (MAP)	On April 1, 2019, MAP was submitted to NJDEP; NJDEP Conditional Approval was received on April 8, 2019; Revised MAP dated April 15, 2019 is included as Attachment 3.	None	None; activity is complete	Required: April 1, 2019 Actual: April 1, 2019
7.b	Install/operate continuous H ₂ S Ambient Air Monitoring System	Eight (8) monitoring stations have been installed and are operational as of May 8th as required.	Station MS-1 had issues with power inverter; Station MS-5 had erroneous data and was taken offline until a replacement meter was installed	Continue operation of monitoring stations.	Required: May 8, 2019 Actual: May 8, 2019
7.c	Notify NJDEP of exceedances or potential to cause odor complaint or air pollution	Surface Emissions Monitoring Report was submitted on May 3rd. Notifications were made on May 9th, 15, 17, 18, 19, 22, 24 and 27 of exceedances of the 30 ppb for 30 minutes based on monitoring station readings.	Data review letters were submitted on May 9, 17 and 28 regarding the exceedances reported on May 9, 15 and 24	Continue operation of monitoring stations and reporting of exceedances.	Required: upon completion of 7.b above Actual: on-going
7.d	Take measures to control or eliminate emissions	In advance of this requirement, NJSEA has decided to design, permit and install GCCS; permit applications were submitted on May 23 and the system has been designed, contractor bid has been received; contract is under negotiation.	None	Upon receipt of permits, construction of the GCCS will commence.	Required: upon exceedance of Condition 7.c level Actual: TBD
7.e	Submit estimate of generation of emission rates for H ₂ S and other air contaminants	Letter report has been submitted on May 29, 2019	None	None; activity is complete	Required: May 30, 2019 Actual: May 29, 2019
7.f	Immediately implement measures to maintain compliance	In accordance with NJSEA letter dated March 29, 2019 to NJDEP, wallboard restrictions have been enforced, additional intermediate soil cover has been placed on the western sideslopes, daily cover has been placed and compacted and active face is minimized.	None	Wallboard restrictions will continue to be enforced; additional intermediate soil cover will continue to be placed; daily cover will continue to be placed and compacted.	Required: N/A Actual: In progress
7.g	If compliance not achieved by September 1, 2019, submit proposal for GCCS	NJDEP representatives visited the site on May 2, 2019. In advance of this requirement, NJSEA has decided to design, permit and install GCCS; a pre-application meeting occurred on May 14 and permit applications were submitted on May 23rd to NJDEP; The system has been designed and contractor bid has been received; contract is under negotiation.	None	Address comments received on permit applications and commence construction of GCCS upon receipt of permits.	Required: 30 days from NJDEP notification Actual: GCCS design, permitting underway

Attachment 2

Keegan Landfill
Monitoring Station Availability

5/8/19 - 5/11/19	
Station	Percent Valid Data
MS1	69.4%
MS2	91.4%
MS3	90.7%
MS4	88.2%
MS5	55.2%
MS6	95.5%
MS7	96.5%
MS8	96.3%

5/12/19 - 5/18/19	
Station	Percent Valid Data
MS1	93.0%
MS2	89.6%
MS3	96.6%
MS4	93.1%
MS5	62.3%
MS6	93.6%
MS7	96.5%
MS8	92.1%

5/19/19 - 5/25/19	
Station	Percent Valid Data
MS1	95.7%
MS2	95.3%
MS3	95.7%
MS4	92.8%
MS5	95.2%
MS6	89.4%
MS7	88.9%
MS8	86.5%

Attachment 3

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
CERTIFICATION OF INFORMATION

Facility ID Keegan Landfill, NEA190001-13317
COMPANY New Jersey Sports & Exposition Authority

1. Responsible Official - This first tier of this certification is to be signed by the responsible official as defined at N.J.A.C 7:27-1.4

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information."

Name (type or print) Christine Sanz Title Senior Vice President/Chief Operating Officer
Signature  Date May 30, 2019

2. Individual(s) with direct knowledge of and responsibility for the information contained in the certified document (N.J.A.C. 7:27-1.39(a)1)

A. "I certify under penalty of law that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information."

Name (type or print) Lisa K. Wilkinson Title SCS Engineers Project Manager (Consultant)
Signature  Date 5/30/2019