

September 30, 2020  
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: September 2020 Progress Report  
Keegan Landfill  
New Jersey Sports and Exposition Authority  
EA ID#: NEA 190002-13317

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 Paragraph 41 of the Compliance Schedule in the Administrative Consent Order (ACO), NEA19002-13317, executed on March 9, 2020 (2020 ACO) for the Keegan Landfill (Landfill). This report covers progress on items related to the 2020 ACO for the month of September.

## 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 is provided below.

## DIFFICULTIES ENCOUNTERED

A letter was submitted via electronic mail on March 18, 2020, related to potential difficulties in meeting ACO compliance deadlines due to COVID-19 related restrictions. There were no difficulties encountered during the period of this progress report, due to COVID-19 related restrictions.

NJSEA reported potential negative impacts to wildlife from the operation of the two temporary utility flares at the Landfill. On September 4, 2020, NJDEP issued a letter authorizing temporary operation of the enclosed flare. The enclosed flare commenced operation on September 21, 2020. The operation of the two utility flares have been discontinued.



On September 13, 2020, the H<sub>2</sub>S concentration at MS-4 exceeded 30 ppb for 30-minutes (see Evaluation of Corrective Measures Implemented below).

## EXPLANATION OF NON-COMPLIANCE

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

## EVALUATION OF CORRECTIVE MEASURES IMPLEMENTED

A letter was submitted to the NJDEP on September 15, 2020 to address the exceedance of the 30 ppb for 30 minute limit at MS-4. The letter discusses the monitoring data recorded at the time of the exceedance, the lack of evidence in the data that the elevated concentrations were attributed to the Landfill, and the actions taken by NJSEA. There have been no additional exceedances at MS-4 and the corrective actions appear effective.

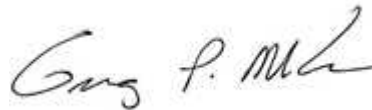
A signed certification of information form is included in **Attachment 2**. The next progress report related to the 2020 ACO will be submitted on or before November 1, 2020.

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

Sincerely,



Lisa K. Wilkinson, PE  
Project Director I  
SCS Engineers



Gregory P. McCarron, PE  
Project Director II  
SCS Engineers

cc: R. Clark, NJDEP (electronic copy)  
A. Fontana (electronic copy)  
B. Farbanish (electronic copy)  
J. Mattessich, NJDEP (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

**September 2020 Progress Report Summary  
Keegan Landfill (NEA190002-13317)**

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
25	Complete installation of expanded gas collection system, second flare, and sulfur treatment system	Installation and startup of all components of the expanded gas collection system, second flare and sulfur treatment system have been completed	None	None; activity is complete	Required: 3/22/2020 Actual: 3/16/2020
26	Submission of any additional permits for construction and operation of a full, and permanent landfill-wide gas collection and management system	Preconstruction air permit application submitted on 12/17/2019. There are no additional Landfill Disruption Approvals, land use permits or air pollution control permits required.	None.	None; activity is complete	Required: 4/8/2020 Actual: 12/17/2019
27	Commence installation of final gas collection system upon receipt of permits.	Permit application under review by NJDEP; blower skid and enclosed flare stack have been delivered to site and are installed.	None.	None, activity is complete	Required: within 15 days of receipt of permits Actual: 3/20/2020
28	Begin operation of final gas collection system	The final collection system is operational. The enclosed flare and associated blower skid is fully operational in accordance with a temporary authorization to operate the enclosed flare issued on September 4, 2020.	None	None, activity is complete	Required: within 180 days from commencement of installation, 9/16/2020 Actual: Installation 3/20/20; operation of enclosed flare 9/21/2020
29	EIPT and final gas collection system shall not interfere with landfill cap and shall minimize impacts on wildlife. Permanent flare shall be enclosed and NJSEA shall consult with Fish and Wildlife	Landfill cap system under analysis and design. Permit application for enclosed flare submitted on December 17, 2019 including planned methods for wildlife protection; anti-perching devices installed on enclosed flare stack in 2 locations	None	Ongoing	Required: None Actual: None
30	Timely response to requests for information on permit applications or submittals	Submitted response to NJDEP request for information in February and May 2020.	None.	None, no outstanding information requests	Required: 20 days from request Actual:
31	Continued operation of gas collection system regardless of expired EIPT	Gas collection system continues to operate.	None	Gas collection system will continue to operate.	Required: EIPT expires 5/14/2020 Actual: Continued system operation past 5/14/2020
32	Submit Title V Operating permit application as determined by USEPA.	Submitted on June 26, 2020	None	None, activity is complete	Required: USEPA Order requires application submittal within 60 days of pre-filing conference; June 26, 2020 Actual: June 26, 2020

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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
33	Maintain the grade and thickness of cover material and repair any damage on a daily basis to facilitate proper stormwater management	NJSEA receives and places soil materials for maintenance and landfill contouring on a daily basis.	None	Ongoing.	Required: Ongoing Actual: Ongoing
34	Vegetation that interferes with approved cap shall be removed in accordance with the approved closure and post-closure plan.	Closure and Post Closure Plan submitted to NJDEP on July 7, 2020 including vegetation management procedures.	None	Vegetation will be managed in accordance with the approved Closure and Post-Closure Plan	Required: Ongoing Actual: Ongoing
35 a-r.	Prepare and submit landfill closure and post-closure plan.	Closure and Post Closure Plan submitted to NJDEP on July 7, 2020 for all items a. through q. Financial Plan, Item r, was submitted under separate cover on September 17, 2020.	None.	None.	Required: 7/7/2020 Actual: 7/7/2020
36	Begin implementation of Closure Plan upon approval by Department	Will commence upon Department approval of Closure Plan	None	None.	Required: 30 days from approval of Closure Plan Actual:
37	Complete all Closure Plan requirements in accordance with schedule provided in approved Closure Plan	Will commence upon Department approval of Closure Plan	None	None	Required: to be determined Actual:
38	Once Closure Plan requirements are completed, commence implementation of Post-Closure Care plan	Will commence upon completion of Closure Plan requirements	None	None	Required: to be determined Actual:
39	All State, Federal, and location permits must be obtained and complied	Will apply based on requirements in Closure Plan	None	None	Required: to be determined Actual:
40	Additional actions will be taken to comply with all applicable State, Federal, and location permits, regulations, etc.	Will apply based on requirements in Closure Plan	None	None	Required: to be determined Actual:
41	A progress report must be submitted the first of every month following the execution of this ACO	This report satisfies this requirement for September 2020.	None	Continue to submit monthly progress reports as required	Required: First of Month Actual: Ongoing
42	Ensure that the H2S concentration does not exceed 30 ppbv over any 30-minute period; prepare a revised monitoring action plan (MAP) for the stations on the northern boundary	Revisions to Monitoring Action Plan submitted with PCP application on 12/17/2019, letter submitted to NJDEP on April 13, 2020 regarding revised MAP; revised MAP submitted on April 28, 2020	On September 13, 2020, the H2S concentration at MS-4 exceeded 30 ppb for 30-minutes. A letter was submitted on September 15, 2020 in response to the exceedance.	Respond to comments as necessary and attend site visit as requested by Bureau of Air Monitoring.	Required: Revised Monitoring Plan - 4/8/20; monitor relocation - 30 days from Monitoring Plan approval Actual: 12/17/2019, 4/13/2020 and 4/28/2020

## Attachment 2

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
CERTIFICATION OF INFORMATION

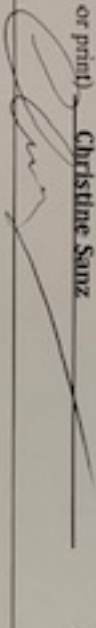
Facility ID KeeganLandfill\_NEA1900002-13317  
COMPANY New Jersey Sports & Exposition Authority

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 

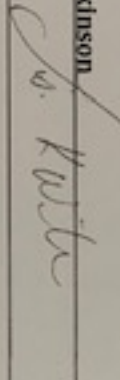
Date 9/28/2020

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 Director (Consultant)

Signature 

Date 9/28/2020