



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOLID & HAZARDOUS WASTE MANAGEMENT PROGRAM
BUREAU OF LANDFILL AND HAZARDOUS WASTE PERMITTING
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Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Acting Commissioner

MAR 02 2010

Daniel Burke, Township Engineer
Township of Jackson
Jackson Township Administration Building
95 West Veterans Highway
Jackson, New Jersey 08527

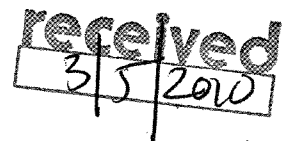
RE: Quarterly Gas Monitoring Report
Jackson Township Landfill
Ocean County, New Jersey
Program Interest No. 132541

Dear Mr. Burke:

This in reference to a letter dated December 30, 2009 received from Mr. Behram Turan, P.E., of CME Associates, accompanied by a quarterly landfill gas survey for the Jackson Township (aka Legler) Landfill.

The Department has reviewed the above-referenced landfill gas test results and determined that the landfill gas testing has been conducted in accordance with the requirements of N.J.A.C. 7-26-2A.8(h) and Condition No. 2 of the closure plan approval for the Jackson Township Landfill. Therefore, the submission of gas sampling results from the December 9 and 23, 2009 sampling episodes are hereby accepted for the record.

The Department reiterates its position that the recent construction of the active landfill gas collection system consisting of solar-powered flares (F-1 and F-2) is not abating methane gas concentrations along the southwestern perimeter of the landfill in the vicinity of Flare F-1. In fact, according to Table 4 appended with the quarterly results, gas concentrations at certain locations along the landfill property line have increased since the last quarterly survey performed on September 9, 2009 (i.e. Wells #8, #10 #12, #13, #15, #16, #17 and #18). Of particular concern is the fact that certain aforementioned wells are located approximately 300 feet from an occupied modular home. At the present time, however, offsite methane quarterly monitoring results tabulated in Table 3 indicate that methane is not migrating to adjoining properties.

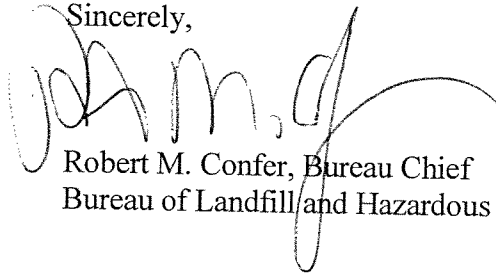


Recognizing that methane gas concentrations are dynamic and are often unpredictable, remedial action levels for mitigation of methane gas are typically 25 percent of the LEL at the landfill property line. Accordingly, the Department authorized in its letter dated April 1, 2009 that an interceptor trench backfilled with gravel be constructed along the southwestern perimeter in order to mitigate potential landfill gas migration. The Township previously indicated to the Department that it is of the opinion that based upon site specific constraints, an interceptor trench is not an appropriate remedy but yet does not offer any alternatives. Absent further information, it is not known at this time what the Township intends to do to address potential methane gas migration issues at the landfill.

Representatives of the Bureau of Landfill and Hazardous Waste Permitting are hereby requesting an on-site meeting with you at the Jackson Township Landfill during the month of March 2010 to discuss this issue in greater detail.

Thank you for your consideration in this matter. Please contact Mark Searfoss at 609-984-6058 or by e-mail at mark.searfoss@dep.state.nj.us to arrange a meeting date and time.

Sincerely,



Robert M. Confer, Bureau Chief
Bureau of Landfill and Hazardous Waste Permitting

LG10-7220

c: Rai Belonzi, BSWCE
Pat Ferraro, BSWCE
Michael Gerchman, BLHWP
Behram Turan, P.E., CME Associates

NJEMS Document: Dec 2009 gas test results