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ROBERT M. CONFER, CHIEF

BUREAU OF LANDFILL AND HAZARDOUS WASTE PERMITTING
SOLID AND HAZARDOUS WASTE MANAGEMENT PROGRAM

ENVIRONMENTAL MANAGEMENT

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Commissioner

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

MAR 28 2013

The Honorable Michael Reina, Mayor
Township of Jackson
Jackson Township Administration Building
95 West Veterans Highway
Jackson, New Jersey 08527

Re: Quarterly Landfill Gas Survey – 1st Quarter 2013
Landfill Perimeter and Off - Site Mitigative Measures
Jackson Twp. Landfill (a.k.a Legler), Ocean County
P. I. #132541

Dear Mayor Reina:

The Bureau of Landfill and Hazardous Waste Permitting (Bureau) is in receipt of the most recent quarterly landfill gas survey report for the Jackson Township Landfill, received on March 25, 2013. The report was prepared and submitted by Bryan Heller of French & Parrello Associates. The survey shows that extremely high concentrations of combustible gas (methane) continue to occur along the boundary of the Jackson Township Landfill and adjacent properties.

In accordance with N.J.A.C. 7:26-2A.7(f)3, and as this office has informed Jackson Township in the past, the detection of 25 percent of the lower explosive limit of combustible landfill gases at the perimeter of the sanitary landfill property, or any concentration of any landfill gases within any structures, shall trigger the construction of an induced draft or active venting system. The system must be designed and constructed in accordance with N.J.A.C. 7:26-2A.7(f)3.

A review of the file indicates that elevated readings of landfill gas have been an ongoing problem. The March 25, 2013 survey showed levels of combustible gas above 25% of the Lower Explosive Limit (LEL) at well 13, 16, 17, 18, 19, and Flare (F-2), and sampling points 17a, 17aa, 18a, 19a, 19b, 19bb, 19bbb, and 19bbbb. The results from the previous quarter, November 8, 2012 survey showed levels of combustible gas above 25% of the (LEL) at well 19, Flare (F-2), and sampling points 19b and 19bb. The results from an earlier quarter, dated September 5, 2012, showed levels of combustible gas above 25% of the LEL in wells 12, 13, 15, 17, 18 and 19, Flares (F-1) and (F-2), and sampling points 8a, 18a, 19b, and 19bb. A number of the aforementioned readings were above 100% of the LEL. Similar elevated readings have been found in historical monitoring events.

Based on gas monitoring conducted to date at this site, it is evident that methane gas is still concentrated at the perimeter of the landfill toward the residential properties. This is despite the fact that a partial passive landfill gas (LFG) collection system was constructed onsite in 2008 in an effort to curb the migrating gas. This system consisted of a perimeter trench along part of the landfill and two (2) candlestick flares. As shown by the gas surveys submitted since that time, the high levels of combustible gas have continued.

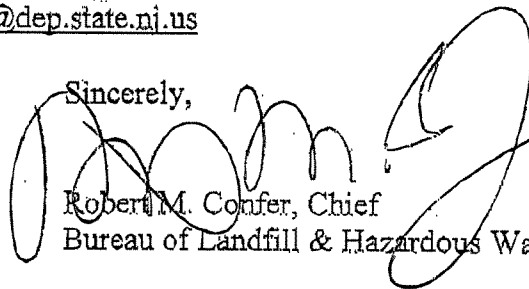
In May 2011, the Bureau met with representatives from Jackson Township to discuss remedial options available to the Township to protect the nearby homes surrounding the landfill from migrating landfill gas. As of this date the Township has not performed the testing and mitigation measures directed by the department. At that time, the Township was asked to submit a plan for the remediation of LFG, a topographic map showing the delineation of the landfill, and the basis of the perimeter trench design to the Department. To date, only the topographic map has been received. Please submit the other two (2) items within fifteen (15) days from the date of this letter.

In correspondence during the last several years, the Bureau requested that the Township take additional action to mitigate this problem. Please see the attached correspondence. Considering that more than adequate time and opportunity has been allowed by this office for the Township to take the necessary action, the Bureau is requesting that Jackson Township immediately take the actions previously requested.

My staff will be in contact with you and your Township staff to set up a meeting in the near future concerning this important matter. In the meantime, Jackson Township is directed to initiate the actions required herein and as referred from prior letters.

If you have any questions regarding this matter, please contact Saara Jumani of my staff at (609) 633-9593 or by e-mail at Saara.Jumani@dep.state.nj.us

Sincerely,



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

Attachments

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