



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Solid & Hazardous Waste

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SEP 10 2020

Geoffrey Perselay, Deputy County Commissioner
Monmouth County Reclamation Center
6000 Asbury Avenue
Tinton Falls, NJ 07753

Re: Solid Waste Facility Permit Renewal and Expansion Application
MONMOUTH COUNTY RECLAMATION CENTER (MCRC)
Tinton Falls Borough, Monmouth County
Preferred ID: 133927
Application No.: SWF150001

Dear Mr. Perselay:

The Bureau of Solid Waste Permitting (the Bureau) is in receipt of a letter dated August 16, 2019 along with a report entitled "Amendments to the Solid Waste Facility Permit Renewal and Phase IV Expansion Major Modification" submitted on your behalf by Prentiss Shaw, P.E. and Arie Kremen, of Cornerstone Environmental Group, LLC, in response to the Department-issued Technical Notice of Deficiency dated May 8, 2018.

The Department has completed its review of the submittal pursuant to N.J.A.C 7:26-2.4(g)11, to determine if the submittal is technically complete. Upon review, the Bureau has determined the application is **TECHNICALLY INCOMPLETE**.

In order for this office to determine the application to be complete, the following deficiencies must be addressed:

Appendix A: Slope Stability

- a) Section 1.2.5 and Figure 2 of the aforesaid report propose that the finished top elevation, including final cover, will be 300 feet above mean sea level (AMSL). However, sections of slope stability analyses depict the highest elevation not exceeding 250 feet. Please revise the analyses to reflect the proposed elevations.
- b) Section 2.2.6 of the application states that the seasonal high groundwater ranges from 134 feet AMSL (in the north) to 95 feet AMSL (in the south) and perched groundwater ranges from 95 feet AMSL (in the east) to 110 feet AMSL (in the west). Further, the report

states that groundwater is separated from the baseliner by at least three feet, which is the minimum required by N.J.A.C. 7:26-2A.7(b)4.xii(2). Reviewing profiles, A-A, B-B and D-D, it appears that the groundwater (the blue dotted line) goes through the waste mass or slip surface. Therefore, MCRC shall revise the profile figures to clearly depict the base liner and slip surface or foundation elevations maintaining at least 3 feet depth between the top of the foundation and seasonally high groundwater.

- c) During the last decade, MCRC has investigated, reported and addressed leachate seeps from the side slopes of Areas III, IV and V of Phase III. Further, MCRC also noted the presence of perched water at various levels throughout the aforementioned areas while upgrading and expanding the gas collection and control system. Perched water within the waste mass indicates the presence of impermeable or non-homogenous stratum. Permeation of rainwater or leachate into the waste material will result in an increased water content above the non-homogenous stratum, increasing its unit weight, decreasing strength of the waste mass, and increasing pore water pressure which may lead to instability.

The application includes global slope stability (profile E-E) analyses for slopes, including Phase II to account for the effect of the overfill liner, but does not address the steepest slope. The base grade plan (Figure 1) shows that exterior (both southern and northern) slopes of Areas III, IV and V of Phase III are steeper compared to other areas. Considering the perched water conditions in Phase III (Areas III, IV and V) and steeper slopes, it is critical to include global stability analyses for profiles across the southeastern as well as northeastern slopes covering these areas. The profile shall include layer(s) of non-homogenous waste mass or lower permeability material based on data collected during seep investigations and/or expansion/modification of the gas collection system. Depending on the nature of the data, the perched water condition shall be properly handled by using either steady state water transfer analysis or spatial pore-water pressure function. The output shall also include a plot of pore-water pressure produced along the slip surface.

Settlement Analysis:

- a) The top elevation (250 feet AMSL) used for the settlement analysis is inconsistent with the proposed height (300 feet AMSL).
- b) Submit a plan clearly depicting points 1 through 5 used for the settlement analysis (Appendix C).
- c) Clarify the use of different values of density for the existing waste (γ_2) used in calculating change in point elevation and change in slope.

Appendix D: Pipe Loading Calculations

- a) A final cover thickness of 24-inches is assumed in the pipe loading calculations. However, Appendix B indicates a final cover thickness of 42-inches and the proposed

final cover system by French & Parrello Associates is 30-inches. Please clarify these discrepancies and revise according to the proposed conditions.

Amendment 6

- a) Section 1.1.4 states that the flares are operated as back up to the landfill gas to energy facility. However, it is the Department's understanding that the gas to energy facility is no longer used. Table 1-1 shows that the three flares are capable of handling the peak total landfill gas generation, but Flares A and C are not operational. The modeled peak gas generation is estimated to be 4,469 scfm with the Phase IV expansion, however, the only operating flare (D), has a max flow rate of 3,700 scfm. Please provide an update on how the gas generation will be handled without the gas to energy facility, and when Flares A and C will become operational.

Additional Comments


Pursuant to N.J.A.C. 7:26-2.4(g)6 the application was circulated to other agencies for their review and comment. In response, the Bureau received the enclosed letter dated July 2, 2020 from the Borough of Tinton Falls that includes comments on the application. Monmouth County shall include responses to the comments/concerns raised in Tinton Falls' July 2, 2020 letter in response to this correspondence.

Please note that the financial plan section of the Closure and Post-Closure Care Plan is still under review and any issues and/or comments identified will be addressed through a separate correspondence.

The Bureau hereby requests that Monmouth County submit a response that addresses the aforementioned items within thirty (30) days from the date of this letter.

If you have any questions concerning this matter, please contact Victoria Goldman of my staff at (609) 292-0749 or by email at Victoria.Goldman@dep.nj.gov.

Sincerely,



Anthony Fontana, Chief
Bureau of Solid Waste Permitting

Enclosure

c: Sanjay Shah, BSWP
John Shevlin, Supervisor, BSWP
Thomas Farrell, BSWCE
John Stavash, BSWCE
Allison McLeod, Office of Local Government Assistance

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Doc: MCRC Technical NOD 2



**Borough of
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Borough Council

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July 2, 2020

Anthony Fontana, Chief
Bureau of Solid Waste Permitting
Department of Environmental Protection
401 E. State Street
PO Box 420, Mail Code 401-02C
Trenton, New Jersey 08625

Re: Application for Renewal & Modification of a Solid Waste Facility Permit
Monmouth County Reclamation Center (MCRC)
Sanitary Landfill and Transfer Station/Materials Recovery Facility
Tinton Falls Borough/Monmouth County
Preferred ID: 133927

Dear Mr. Fontana:

Please accept this letter on behalf of the Borough of Tinton Falls, as our comments on the "Amendments to the Solid Waste Facility Permit Renewal and Phase IV Expansion Major Modification," (the Addendum), dated August 2019, as provided with your letter dated September 11, 2019. We have reviewed the Addendum, along with the proposed amendment to the Phase IV Expansion Major Modification as well as the Solid Waste Facility Permit Renewal Application (the Application) dated June 30, 2015 and subsequently revised on October 12, 2015. We understand that the Application proposed an expansion to include a Phase IV Expansion of the Monmouth County Reclamation Center (MCRC).

Our comments on the Application and Addendum relate generally to two overall concerns. First, the County of Monmouth has been deficient in their obligations to communicate with Borough officials concerning the ongoing operations of the MCRC, the various problems arising at the MCRC and the plans for future capital modifications and improvements. We have serious concerns about an expansion of the MCRC to include Phase IV without those issues being addressed, both as they currently exist and for future operations. Second, we have specific concerns about the proposed plans and submittal documents for the expansion and the potential for significantly deleterious effects on the residents of Tinton Falls, especially in those neighborhoods that surround the landfill where the effects are most felt.

1. Concerns About Communication Failures by the County of Monmouth

Regarding the first issue, we had hoped that communications from the County to the Borough and its residents would have improved after Senator Vin Gopal convened two public meetings in 2019 to address the issues raised by Tinton Falls and its residents. In particular, there were unaddressed concerns regarding odor complaints, traffic issues and leachate collection, in addition to the general landfill operations. Representatives of the NJDEP and representatives from the County of Monmouth attended those sessions to provide much-needed information to our residents and to members of the Tinton Falls Governing Body and administration. Importantly, the County representatives at those sessions pledged to improve communications with the Borough by providing information on a regular basis regarding the issues at the MCRC.

For several months after those sessions, we received regular updates through emails. Unfortunately, the communications from the County abruptly ceased in early November and have not re-commenced. By way of example of the lack of communications, it was publicly reported in the local press on April 22, 2020, that the County Freeholders voted to approve the issuance of \$8 million in bonds to finance planned upgrades to the MCRC. The Borough and its officials had been given no previous notice of this action and had no response for constituents when asked about the need for the spending. While this expenditure may ultimately be beneficial for the MCRC, it appears to be designed to address issues that we did not know about, and proposed a spending plan that was also unknown to us, on matters that deeply concern residents of Tinton Falls. This is but one example of a complete lack of communication on MCRC-related issues between the County and the Borough.

Based on the significant lack of communication from the County about a landfill located within the boundaries of Tinton Falls, we oppose the Application and Addendum. We are concerned that the proposed expansion of the landfill through Phase IV will merely exacerbate and increase our concerns, unless a structural change is made in communications that would guarantee ongoing and updated information to the Borough and its residents about the landfill, its operations and problems.

2. Comments on the Plans and Associated Documents

We also have comments based upon a cursory review of the plans and submittal documents prepared by Cornerstone for the Phase IV Expansion. We have not conducted a detailed technical review of the plans or associated documents, however the following are high level comments/questions that we present for NJDEP review:

1. The Phase IV expansion is to be constructed between two existing landfill cells. How will the liner system of the new phase be constructed and how will it ensure leachate does not migrate into the groundwater?
2. Please further explain the term "overliner" and how the installation of an overliner will affect gas collection and leachate management.
3. After Phase IV has been filled, the plans show the maximum landfill height to be close to elevation 300, which represent a fill of approximately 80-feet above the current top of landfill. How will odor and windblown dust be controlled as the expansion grows vertically?
4. How will side slope erosion be managed as the landfill expands vertically?

5. How much of the existing landfill would be disturbed (potentially creating odors) with the proposed expansion?
6. Landfill odors have been an ongoing issue to local residents. What additional measure will be undertaken to ensure odor issues are addressed as the facility expands?
7. Will the expansion of the landfill require upgrades to the landfill gas collection system? We would anticipate additional gas wells will need to be installed. Will the gas collection pipe network need to be upgraded, this would include blowers, condensation collection, and the landfill gas to energy plant? If these systems are to be upgraded, what additional area of the site would be impacted and to what extent?
8. It is our understanding that the facility operators currently use Neutraline vapor for odor control. Please confirm that NJDEP has reviewed all uses of this chemical at this facility and that there are no health issues associated with its existing and/or proposed use.
9. How will leachate collection from the expansion be addressed? How does this impact the existing collection, conveyance, and treatment systems?
10. Will the expansion of the landfill generate increased traffic volume to the facility? If so, what are the impacts to the levels of service of adjacent roadways.
11. The landfill expansion will extend the life of the landfill. Have the additional years of operation been incorporated into the traffic study for the facility with the appropriate growth rates?
12. Does the facility have a vector management plan in place, and if so, has the plan been modified to reflect the change in the facility operations due to this expansion? Bird management is of particular concern in the area.

We thank you for the opportunity to present these comments on behalf of the Borough of Tinton Falls and its residents. These are serious concerns for our constituents, so if you would like any additional discussions or meetings to further consider these concerns, please let us know. We would very much appreciate follow-up on the concerns and comments in this letter.

Very Truly Yours,

Tracy A. Buckley

Tracy A. Buckley, Council President
Deputy Council President Risa Clay
Councilman John Manginelli
Councilman Michael Nesci
Councilman Brock Siebert

CC:

Kerry Pflugh, Director, NJDEP Office of Local Government Assistance
Allison McLeod, Program Manager, NJDEP Office of Local Government Assistance
Victoria Goldman, NJDEP Bureau of Solid Waste Permitting