

SCS ENGINEERS

October 22, 2015

Karen Maples
Regional Hearing Clerk
U.S. Environmental Protection Agency- Region 2
290 Broadway - 16th Floor
New York, New York 10007-1866

Certified Mail Return Receipt: 7014-1820-0001-4772-5861

The Matter Of: Atlantic County Utilities Authority
CAA-02-2015-1212

Dear Ms. Maples;

Please find attached SCS Engineers' Notice of Motion to Intervene and a request that the Settlement Conference and Hearing include SCS Engineers. In addition, please find attached a Letter Brief and two (2) attachments both supporting the Notice of Motion to Intervene.

Should you have any questions please feel free to contact me at E-Mail at +1 (703) 471-6150 or by E-Mail at RBedell@SCSEngineers.com.

Sincerely



Richard S. Bedell, Esq.
Counsel
SCS ENGINEERS

cc: Anhthu Hoang
Assistant Regional Counsel
Office of Regional Counsel, Air Branch
U.S. Environmental Protection Agency - Region 2
290 Broadway- 16th Floor
New York, New York 10007-1866
Certified Mail Return Receipt: 7014-1820-0001-4772-5854

U.S. Environmental
Protection Agency-Reg 2
2015 OCT 27 AM 11:08
REGIONAL HEARING
CLERK

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEWYORK, NY 10007-1866

Stearns, Conrad and Schmidt, Consulting Engineers, Inc.
dba, SCS Field Services
11260 Roger Bacon Dr.
Suite 300
Reston, VA 20190
Phone: (703) 471-6150
E-Mail: RBedell@SCSEngineers.com
Attorney for Intervenor, Richard S. Bedell, MD Bar #: 05958

U.S. Environmental
Protection Agency-Reg 2
2015 OCT 27 AM 11:08
REGIONAL HEARING
CLERK

In re:
Atlantic County Utilities Authority,

CAA-02-2015-1212

Respondent

**NOTICE OF MOTION
TO INTERVENE**

In a proceeding under
Section 113(d) of the Clean Air Act

To: Anhthu Hoang
Office of Regional Counsel, Air Branch
U.S. Environmental Protection
Agency, Region 2
290 Broadway - 16th Floor
New York, New York 10007-1866

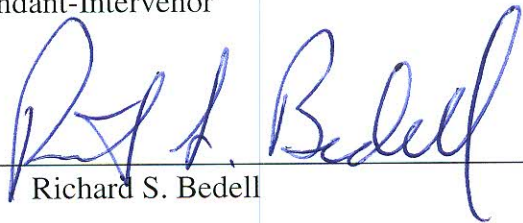
PLEASE TAKE NOTICE that the undersigned attorney for Intervenor SCS Field Services in the above-referenced action will move before this Court to intervene as a party in this matter and to attend the Settlement Conference and Hearing when scheduled in accordance with Respondent's Answer to Complaint and Request for Hearing.

PLEASE TAKE FURTHER NOTICE that in support of the Motion Intervenor SCS Field Services will rely upon the annexed Letter Brief.

PLEASE TAKE FURTHER NOTICE that SCS Field Services requests leave to attend and present evidence at the hearing.

Stearns, Conrad and Schmidt, Consulting
Engineers, Inc. dba, SCS Field Services
Defendant-Intervenor

BY:



Richard S. Bedell

Dated: October 19, 2015

Stearns, Conrad and Schmidt, Consulting Engineers, Inc.
dba, SCS Field Services

Letter Brief

Stearns, Conrad and Schmidt, Consulting Engineers, Inc. dba, SCS Field Services provides operation, monitoring, and maintenance services for a broad range of solid waste and environmental control facilities. These facilities include composting systems, biogas systems and pipelines, leachate treatment and groundwater remediation. SCS Field Services manages operations at hundreds of solid waste facilities throughout the country.

In accordance with 40 CFR 22.11, SCS Field Services (SCS) petitions to intervene and moves for leave to file a non-party brief in the matter of Atlantic County Utilities Authority (UCUA) CAA-02-2015-1212.

The crux of the complaint alleges that SCS's employee was not trained and did not properly operate a Foxboro TVA1000 having a Serial# 41400684. USEPA then assessed penalties against SCS's client ACUA.

SCS contracted with ACUA to provide quarterly surface emissions monitoring over a specified surface monitoring path to comply with NSPS regulations, 40 CFR 60.755. At SCS's discretion, SCS coordinated quarterly monitoring based on weather conditions and other physical conditions to ensure that the monitoring occurred during reasonable periods during the applicable quarter. Where monitoring indicated that emissions exceeded limits specified in §60.755(c)(4) ACUA was notified and after ACUA remediated the condition SCS Field Services would "recheck" to confirm compliance.

The specific day that the quarterly monitoring took place varied from quarter to quarter and other than ensuring that monitoring occurred during each quarter such monitoring was as reasonably scheduled with ACUA both party's mutual convenience.

USEPA contacted ACUA and scheduled a site visit to observe ACUA operations. Because the visit could be reasonably combined with one of SCS Field Services quarterly visits it was agreed to schedule the visit at that time.

On December 18, 2013 representatives of USEPA met SCS Field Services employee Michael Marks at the ACUA landfill located at 6700 Delilah Road in Egg Harbor Township, New Jersey 07848.

From the onset there were problems with the TVA. Initially the TVA sending unit failed to operate and SCS Field Services was unable to calibrate the TVA. With the help of Foxboro service technicians, on the phone, other SCS Field Services experts and USEPA personal SCS Field Services was able to reset the TVA but it failed shortly thereafter. It was clear to all parties that there was a problem with the TVA and that it needed to be replaced. Ultimately a new TVA was acquired the next day but USEPA had already concluded their site visit.

In accordance with the Clean Air Act (ACT) §114(a)(1) the Administrator may require any person who owns or operates any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis to – (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods. However the failure of a portable testing device such as a TVA does not fall within the control or process equipment regulated by the ACT.

Sections 23, 24, and 25 of the complaint outline the basic parameters of leak detection and repair (LDAR). Notably, before LDAR can begin the field technician must verify that the testing device is properly functioning. This is done by performing a series of startup procedures and calibration testing of the equipment. Each manufacturer has its own startup procedure and calibration procedure. As explained above the TVA failed during the startup and calibration phase and SCS Field Services was unable to begin any LDAR testing activities. The inability to perform LDAR testing on this particular day is not a violation of the ACT because the quarterly testing required by the ACT allows for testing within the quarter and not on a specific day in the quarter.

SCS Field Services believes that USEPA misinterpreted the field technician's attempts to trouble shoot the failed TVA. SCS Field Services does not dispute the findings of fact in the complaint. However, those findings of fact have been interpreted and misapplied. The facts do not correspond with the conclusions reached or the penalties assessed.

In accordance with line item 92 of the complaint the SCS Field Services SOP is mischaracterized as missing. That was not correct because SCS Field Services follows the SOP outlined by the ACT, as correctly described in items 24 through 31 of the complaint. The SCS Field Services technician was knowledgeable in and followed those procedures. A copy of the technician's resume is attached.

The following line items are addressed point-by-point:

Line Item 93: "on-the-job-training" by senior technicians until the junior technician is sufficiently qualified to perform surface monitoring for a facility is a common and appropriate training methodology.

Line Item 94: The EPA Inspector observations are taken out of context. At the time that the EPA Inspectors made this observation considerable amount of time had already been spent trying to warm up and calibrate the TVA. It was obvious that the TVA wasn't functioning properly and the SCS Field Services technician was attempting various "non-traditional" methods to "jump-start" the TVA. It was not the technician's intent to bypass the proper startup procedures. There was simply something wrong with the TVA and in consideration of the EPA Inspectors tight schedules the technician was trying to avoid having the EPA Inspectors make another visit. Once the equipment started working the technician would

have restarted the startup and calibration activities. Unfortunately, the TVA did not function.

Line Item 95: The observed acts on the part of the SCS Field Services technician was not to avoid properly starting up and calibrating the TVA but an attempt to jump-start the non-functioning TVA and to see if it could be made ready for startup and calibration.

Line Item 96: The observed instrument counts correspond with and are demonstrative of a non-functioning TVA.

Line Item 97: The observation is consistent with the SCS Field Services technician attempts to jump-start the TVA and then to properly perform the startup and calibration procedures. Unfortunately, the TVA was inoperative.

Line Item 109: Although the EPA Inspectors were able to warm up and calibrate EPA's TVA it was not available for SCS Field Services use. Never the less the results of the EPA tests were shared with SCS Field Services and ACUA personnel completed the remedial actions necessary. SCS Field Services returned to the site on December 27th and performed supplemental testing to demonstrate compliance. Notably a different Foxboro TVA 1000 was used. A copy of the Fourth Quarter 2013 report is attached.

Line Item 116: The surface monitoring instrument specification and procedures set forth in Minor Modification Permit Ref #23 does not specify specifically identified testing dates within any particular quarter.

Line Item 117: EPA Inspectors confirmed that the facility is in compliance with 40 C.F.R. §§ 60.755(c) and (d) and EPA Reference Method 21 of 40 C.F.R. Part 60 Appendix A, in conducting surface monitoring at the Facility.

Regarding the three counts of the complaint

Count 1: Failure to meet instrument specifications and calibration gas requirement according to 40 C.F.R. Part 60 Appendix A Method 21 and as required by 40 C.F.R. §§ 60.755(d) (1) & (2), 63.1955(a) (1), and Ref. #23 in the 2011 Title V Minor Modification Permit.

Response: EPA requested and scheduled an inspection meeting for December 18, 2013 to allow EPA to observe surface emission monitoring at ACUA facility located at 6700 Delilah Rd., Egg Harbor Township, NJ, 08234-5623. The Foxboro TVA 1000 meter intended to be used failed and no monitoring activities took place on that date. As a result the alleged failure is moot.

Count 2: Failure to meet performance evaluation of LDAR equipment according to 40 C.F.R. Part 60 Appendix A Method 21 as required by 40 C.F.R. §§ 60.755(d)(3), 63.1955(a)(l), and Ref. #23 in the 2011 Title V Minor Modification Permit.

The Foxboro TVA 1000 meter intended to be used malfunctioned and no monitoring activities took place on that date. As a result the alleged failure is moot.

Count 3: Failure to follow LDAR equipment calibration procedure according to 40 C.F.R. Part 60 Appendix A Method 21 as required by 40 C.F.R. §§ 60.755(d)(4), 63.1955(a)(1), and Ref. #23 in the 2011 Title V Minor Modification Permit.

The Foxboro TVA 1000 meter intended to be used malfunctioned and no monitoring activities took place on that date. As a result the alleged failure is moot.

SCS Field Services does not dispute that the TVA it attempted to use did not start up properly and was not calibrated. It was damaged and the damaged equipment was not used for any testing and LDAR monitoring was rescheduled for another day within the permitted quarterly time period.

In addition to the above EPA in its Preliminary Statement discusses Section 113(d) of the Act and incorrectly interprets Section 113(d) regarding a waiver of the time limitation assessing penalties for an alleged violation. The plain language of Section 113(d) is to allow consideration of ongoing and continuous violations that began more than one (1) year before EPA took administrative notice of an alleged violation. The alleged violation is and was not a continuing and ongoing violation and accordingly Section 113(d) does not apply and any waiver of Section 113(d) is moot and inapplicable to the facts of the alleged violation.

Lastly, the penalties assessed are excessive and they do not reflect the minor nature of the equipment failure.

In accordance with the Administrative Procedure Act, 5 U.S.C. §§ 552 et seq. the allegations of the complaint and the proposed penalty are contested and a hearing is requested.

MICHAEL MARKS

Education

Keansburg High School – Keansburg, New Jersey

Training/Certifications

40-hour Health and Safety Training OSHA 29 CFR 1910.120 - Current
CPR Certified

Member of the New Jersey Solid Waste Association of North America (NJSWANA)

Firefighter 1 - NJ State Certified First Responder

John Zink Flare School

Professional Experience

Mr. Marks is a Senior Field Technician with the SCS Field Services' Operation and Maintenance group based in Medford, New Jersey. Mr. Marks has over 15 years of experience in the Landfill Gas (LFG) operations and maintenance, LFG collection/management system construction on small to large systems, NSPS surface emissions monitoring and reporting, along with general LFG Construction Quality Assurance/Quality Control (CQA/CQC) oversight.

Examples of Mr. Marks' project experience include:

Brookfield Avenue Landfill, Staten Island, NY - LFG field technician for services including GCCS startup, routine wellfield monitoring and adjustments, wellfield troubleshooting and repairs.

Burlington County Resource Recovery Complex, Columbus, NJ - LFG field technician for services including routine wellfield monitoring and adjustments, NSPS surface emissions monitoring, wellfield repairs, CQA oversight of contractors installing the LFG system piping and drilling operations of new wells.

Monmouth County Landfill, Tinton Falls, NJ - LFG field technician for services to clean, maintain, and reinstall 22 new well pumps, and to assure that the operation of the pumps meets the specifications of the manufacturer.

Cumberland County Improvement Authority Landfill, Millville, NJ - LFG field technician for services including routine wellfield monitoring and adjustment, NSPS surface emissions monitoring, and wellfield repairs.

Tullytown Landfill, Morrisville, PA. - LFG field technician for services including HDPE pipe welding, trench slope monitoring, and connection to the condensate pump stations along with the connection to the existing LFG management system. Approximately 2,500 linear feet of LFG collection/management pipe was installed for this project.

New Bath Landfill, Bath, NY. - LFG field technician for services including HDPE pipe welding, LFG trench excavation and backfill, slope monitoring, and connection to the condensate pump stations along with connection to the existing LFG management system. Approximately 2,000 linear feet of LFG collection/management pipe was installed for this project.

Essington Avenue Market Place, Philadelphia, PA. – Field technician for gas monitoring and collection system oversight of a 250,000 square foot building during construction activities. Services include monitoring of the installation of the gas collection system and interior and exterior gas monitoring services and reporting.

***Pinelands Park Landfill, Egg Harbor Township, NJ.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), approximately 150 LFG extraction wells, LFG migration and compliance monitoring, troubleshooting GCCS issues, and various small construction repair/upgrade projects. The Pinelands Park Landfill has an 18-hole public golf course which portions of the course are incorporated into the landfills topography.

***HMDC Kingsland Landfill, North Arlington, NJ.** – LFG CQA field technician for the construction of a LFG collection and control system (GCCS) which included approximately 100 LFG extraction wells, 10 condensate management points, and 10,000 linear feet of various conveyance piping. Services included construction oversight to assure compliance with the project drawings and specifications.

***Keystone Landfill, Adams County, PA.** - LFG field technician for services included quarterly Summa canister sampling, tedlar bag sampling on various in refuse monitoring probes, and perimeter probe monitoring and reporting.

***Sussex County Landfill, Sussex County, VA.** - LFG field technician for the maintenance of the existing LFG collection and control systems (GCCS) at the site. Due to the high volume of refuse disposal, LFG extraction wells needed to be extended along with the installation /upgrade of new and existing LFG conveyance piping.

***G.R.O.W.S. and Tullytown Landfills, Morrisville, PA.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), approximately 300 LFG extraction wells, LFG migration and compliance monitoring, troubleshooting GCCS issues, and various environmental monitoring tasks. Additional services included small to medium repair/upgrade construction projects.

***Edgeboro Landfill, East Brunswick, NJ.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), approximately 250 LFG extraction wells, LFG migration and compliance monitoring (Title V and NSPS), troubleshooting GCCS issues, and various environmental monitoring tasks. Additional services included small to medium construction repair/upgrade projects.

***Central and Southern Landfills, DE.** - LFG field technician for upgrades associated with the LFG collection and control system (GCCS) at both facilities. Services included expansion of the existing collection system at the Central facility and blower/flare station upgrades at the

Southern facility. Additional services included surface emissions monitoring at both facilities along with migration compliance monitoring and reporting.

***HMDC Balefill Landfill, NJ.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), approximately 100 LFG extraction wells, LFG migration and compliance monitoring, troubleshooting GCCS issues, and various environmental monitoring tasks. Additional services included small to medium construction repair/upgrade projects.

***City of Albany Landfill, NY.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), troubleshooting GCCS issues, and various environmental monitoring tasks. Additional services included small to medium construction repair/upgrade projects.

***City of Hartford Landfill, CT.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), troubleshooting GCCS issues, and various environmental monitoring tasks. Additional services included small to medium construction repair/upgrade projects.

***City of Nashua Landfill, NH.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), troubleshooting GCCS issues, and various environmental monitoring tasks. Additional services included small to medium construction repair/upgrade projects.

***City of New York Fresh kills Landfill, NY.** - LFG field technician for services including routine and non-routine operation and maintenance of the LFG collection and control system (GCCS), troubleshooting GCCS issues, and various environmental monitoring tasks. Additional services included small to medium construction repair/upgrade projects.

- Denotes project work performed under previous employers.

SCS FIELD SERVICES

File No. 07211077.00
February 17, 2014

Mr. Gary Conover
Atlantic County Utilities Authority
6700 Delilah Road
Egg Harbor Township, New Jersey 07848

Subject: Supplemental Surface Emission Monitoring (SEM) Results at the Atlantic County Utilities Authority (ACUA) Landfill, Egg Harbor Township, NJ
Fourth Quarter 2013

Dear Mr. Conover:

The following report presents the results of supplemental surface emissions monitoring (SEM) performed by SCS Field Services (SCS-FS) for ACUA at the subject site (the landfill). This monitoring was conducted at ACUA's request as a follow-up to monitoring exceedances reported by the United States Environmental Protection Agency (EPA) during a site inspection conducted on December 18, 2013.

Follow-Up to December 18, 2013 EPA Inspection

EPA conducted an inspection at the landfill on December 18, 2013. During this inspection, EPA personnel performed SEM in conjunction with SCS-FS at various locations, and noted that methane levels at 14 locations were greater than 500 parts per million (ppm). Emissions were observed at the following areas:

- Around the Well Casing of EW-18R (see photo Exhibit 1 and 12)
- Around the Well Casing of EW-53R (see photo Exhibit 2 and 13)
- Coupling by base of EW-53R
- Around the Well Casing of EW-68BR (see photo Exhibit 3 and 14)
- Around the Well Casing of Abandoned Well EW-66 (see photo Exhibit 15)
- Around the Well Casing of EW-66R (see photo Exhibit 4 and 16)
- Around the Well Casing of EW-88 (see photo Exhibit 5 and 17)
- EW-88 Condensate Drip Leg (see photo Exhibit 6 and 18)
- Around the Well Casing of EW-87 (see photo Exhibit 7, 19, and 24)
- Sandy area adjacent to EW-87
- Cell 3 leachate pump station primary pump (see photo Exhibit 8 and 20)
- Cell 3 leachate pump station secondary manhole vent lid (see photo Exhibit 9 and 21)
- Crevasse between Cells 3 & 10 (see photo Exhibit 10 and 22)
- Crevasse between Cells 3 & 10, base of Cell 10 (see photo Exhibit 11 and 23)



In response to these detections, ACUA personnel completed appropriate remedial actions at each exceedance location, described below:

- Around the Well Casing of EW-18R - Additional cover was placed around the well casing.
- Around the Well Casing of EW-53R - Additional cover was placed around the well casing.
- Coupling by base of EW-53R - Additional cover was placed around the well casing.
- Around the Well Casing of EW-68BR - Additional cover was placed around the well casing.
- Around the Well Casing of Abandoned Well EW-66 - Excavated and abandoned the well below grade.
- Around the Well Casing of EW-66R - Additional cover was placed around the well casing.
- Around the Well Casing of EW-88 - Additional cover was placed around the well casing.
- EW-88 Condensate Drip Leg - The drip leg was reconfigured to drain to another low point in the system.
- Around the Well Casing of EW-87 - Additional cover was placed around the well casing.
- Sandy area, adjacent to EW-87 - Additional cover was added to the area.
- Cell 3 leachate pump station primary pump - Closed the Cell 3 leachate primary intake valve from the landfill.
- Cell 3 leachate pump station secondary manhole vent lid - Attempted to close the Cell 3 leachate secondary intake valve from the landfill.
- Crevasse between Cells 3 & 10 - Additional cover was added to the area.
- Crevasse between Cells 3 & 10, base of Cell 10 - Additional cover was added to the area.

On December 27, 2013, SCS-FS conducted supplemental SEM at each exceedance location. Monitoring was performed as specified in 40 CFR 60.755 (c) and (d), and 40 CFR 60, Appendix A, Method 21. The monitoring locations were tested for emissions of volatile organic compounds (VOCs), as methane, using a Foxboro TVA-1000B flame ionization detector (FID).

During the December 27, 2013 monitoring event, SCS-FS found that surface methane levels at 13 of the locations were less than 500 ppm above background, while levels at the Cell 3 leachate pump station secondary manhole vent lid were greater than 500 ppm above background. In response, landfill personnel completed additional remedial actions at the location.

SCS-FS conducted additional monitoring at the Cell 3 leachate pump station, secondary manhole vent lid on January 6, 2014 and found that surface methane levels were greater than 500 ppm above background. In response to this detection, a new control device was installed by ACUA personnel. A remote LFG wellhead was installed at the Cell 3 leachate secondary manhole and connected to the landfill gas collection system.

On January 16, 2014, SCS-FS conducted supplemental SEM at each exceedance location. Surface emission levels at 13 of the locations, including the Cell 3 leachate pump station secondary manhole vent lid, were less than 500 ppm above background. Emission levels around the well casing of EW-87 were greater than 500 ppm above background. In response to this detection, ACUA personnel placed additional cover around the well casing of EW-87. The location was re-monitored on January 16, 2014 and surface emission levels were less than 500 ppm above background.

On February 14, 2014, SCS-FS conducted supplemental SEM around the well casing of EW-87. Surface emission levels at this location were less than 500 ppm above background.

Table 1, presented in Attachment 1, summarizes the supplemental monitoring conducted in response to the December 18, 2013, EPA inspection. The Calibration and Pertinent Data Forms for the monitoring performed by SCS-FS are included in Attachment 2.

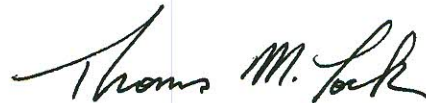
No further follow-up monitoring is required on any of the 14 areas found by the EPA during their inspection on December 18, 2013. The next quarterly SEM should be completed by March 31, 2014.

Thank you for the opportunity to provide this service. Please contact either of the undersigned if you require further information.

Sincerely,



Scott Schoffner
Senior Project Superintendent
SCS FIELD SERVICES



Thomas M. Lock
Project Manager
SCS FIELD SERVICES

cc: Marcus Scrimgeour, P.E., SCS Engineers
Mike Knox, SCS Field Services

Attachments

ATTACHMENTS

1. SEM DATA (Table 1)
2. SEM Calibration and Pertinent Data Form
3. Photographs

ATTACHMENT 1
SEM DATA (Table 1)

TABLE 1. SURFACE EMISSIONS TESTING RESULTS
Atlantic County Utilities Authority, Egg Harbor Township, NJ

Follow-Up SEM to EPA Inspection Exceedances on 12-18-13

Date	Time	Tag	FID Conc. (ppm)	Notes
12/18/13	NA	Well Casing of EW-18R	9030	
12/27/13	13:37	Well Casing of EW-18R	23	Additional cover was placed around the well casing. 10-Day Recheck
1/16/14	11:19	Well Casing of EW-18R	20	30-Day Recheck
12/18/13	NA	Well Casing of EW-53R	10500	
12/27/13	13:43	Well Casing of EW-53R	24	Additional cover was placed around the well casing. 10-Day Recheck
1/16/14	11:21	Well Casing of EW-53R	23	30-Day Recheck
12/18/13	NA	Coupling by base of EW-53R	1002	
12/27/13	13:46	Coupling by base of EW-53R	90	Additional cover was placed around the well casing. 10-Day Recheck
1/16/14	11:21	Coupling by base of EW-53R	25	30-Day Recheck
12/18/13	NA	Well Casing of EW-68BR	2900	
12/27/13	13:48	Well Casing of EW-68BR	2	Additional cover was placed around the well casing. 10-Day Recheck
1/16/14	11:23	Well Casing of EW-68BR	139	30-Day Recheck
12/18/13	NA	Well Casing of Abandoned Well EW-66	15700	
12/27/13	13:50	Well Casing of Abandoned Well EW-66	150	Excavated and abandoned the well below grade. 10-Day Recheck
1/16/14	11:26	Well Casing of Abandoned Well EW-66	69	30-Day Recheck
12/18/13	NA	Well Casing of EW-66R	3085	
12/27/13	13:53	Well Casing of EW-66R	43	Additional cover was placed around the well casing. 10-Day Recheck
1/16/14	11:27	Well Casing of EW-66R	12	30-Day Recheck
12/18/13	NA	Well Casing of EW-88	12200	
12/27/13	13:55	Well Casing of EW-88	74	Additional cover was placed around the well casing. 10-Day Recheck
1/16/14	11:29	Well Casing of EW-88	220	30-Day Recheck
12/18/13	NA	EW-88 Condensate Drip Leg	800	
12/27/13	13:57	EW-88 Condensate Drip Leg	243	Reconfigured drip leg to drain to another low point. 10-Day Recheck
1/16/14	11:30	EW-88 Condensate Drip Leg	27	30-Day Recheck

ppm - parts per million
nd - not detected
<1 - less than 1

SCS FIELD SERVICES
717-671-5102

TABLE 1. SURFACE EMISSIONS TESTING RESULTS
Atlantic County Utilities Authority, Egg Harbor Township, NJ

Follow-Up SEM to EPA Inspection Exceedances on 12-18-13

Date	Time	Tag	FID Conc. (ppm)	Notes
12/18/13	NA	Well Casing of EW-87	4300	
12/27/13	14:00	Well Casing of EW-87	77	Additional cover was placed around the well casing. 10-Day Recheck
1/16/14	11:31	Well Casing of EW-87	2518	30-Day Recheck
1/16/14	12:08	Well Casing of EW-87	90	2nd 10-Day Recheck
2/14/14	9:40	Well Casing of EW-87	43	2nd 30-Day Recheck
12/18/13	NA	Sandy area, adjacent to EW-87	7700	
12/27/13	14:01	Sandy area, adjacent to EW-87	67	Additional cover was added to the area. 10-Day Recheck
1/16/14	11:45	Sandy area, adjacent to EW-87	7	30-Day Recheck
12/18/13	NA	Cell 3 pump station, primary pump	682	
12/27/13	14:02	Cell 3 pump station, primary pump	33	Closed the Cell 3 leachate primary intake valve. 10-Day Recheck
1/16/14	11:45	Cell 3 pump station, primary pump	6	30-Day Recheck
12/18/13	NA	Cell 3 pump station, secondary manhole vent lid	16800	
12/27/13	13:31	Cell 3 pump station, secondary manhole vent lid	1561	Attempted to close the Cell 3 leachate secondary intake valve. 10-Day Recheck
1/6/2014	12:30	Cell 3 pump station, secondary manhole vent lid	2090	2nd 10-Day Recheck
1/16/14	11:47	Cell 3 pump station, secondary manhole vent lid	29	120-Day Recheck
12/18/13	NA	Crevasse between Cells 3 & 10	2100	
12/27/13	14:13	Crevasse between Cells 3 & 10	53	Additional cover was added to the area. 10-Day Recheck
1/16/14	11:48	Crevasse between Cells 3 & 10	145	30-Day Recheck
12/18/13	NA	Crevasse between Cells 3 & 10, base of Cell 10	832	
12/27/13	14:16	Crevasse between Cells 3 & 10, base of Cell 10	36	Additional cover was added to the area. 10-Day Recheck
1/16/14	11:59	Crevasse between Cells 3 & 10, base of Cell 10	7	30-Day Recheck

ppm - parts per million
nd - not detected
<1 - less than 1

SCS FIELD SERVICES
717-671-5102

ATTACHMENT 2

SEM Calibration and Pertinent Data Forms

SCS FIELD SERVICES

NSPS Surface Emissions Monitoring Calibration and Pertinent Data Form

Date: 12/27/13 Site: ACUA Job Number: 07211077.00

Technician(s): Ben Lock

Weather Observations

Wind Speed: Calm MPH Wind Direction: North Barometric Pressure: 30.01 "Hg

Air Temperature: 50 °F General Weather Conditions: Clear

Calibration Information

Instrument ID: 34945693 Span Calibration Gas Manufacturer: Landtec

Cal Gas Lot # 42138-01 Expiration Date: 5/1/2015 Cal Gas Concentration: 500 ppm

Pre-monitoring Calibration Precision Check

*Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. **The calibration precision must be less than or equal to 10% of the calibration gas value.***

Trial	Zero Air Reading (ppm)	Cal Gas Reading (ppm)	Cal Gas Conc. – Cal Gas Reading
1	0.17	499	1
2	1.00	501	1
3	0.12	502	2
Average Difference:			1

$$\begin{aligned} \text{Calibration Precision} &= \text{Average Difference} / \text{Cal. Gas Conc.} \quad \times 100\% \\ &= \frac{1}{500} \quad \times 100\% \\ &= \underline{0.27} \quad \% \end{aligned}$$

Pre-monitoring Response Time Check

*Procedure: Introduce zero concentration methane/H2S into the instrument. Quickly change to the calibration gas. Measure the amount of time it takes the instrument to read 90% of the calibration gas concentration. **This average response time must be less than or equal to 30 seconds.***

Trial	Start Time (Add Cal Gas) (hh:mm:ss)	Time at 90% Reading (hh:mm:ss)	Time Elapsed (Seconds)
1	9:02:00 AM	9:02:09 AM	9
2	9:03:00 AM	9:03:12 AM	12
3	9:03:45 AM	9:03:55 AM	10
Average Response Time:			10

Background Concentration Checks

Upwind Location Description: North of Site on Access Road Reading: 1.10 ppm

Downwind Location Description: South of Site on Access Road Reading: 22.40 ppm

Average Background Reading: 11.75 ppm

Post-monitoring Calibration Precision Check

Zero Air Reading: 0.56 ppm Cal Gas Reading: 499 ppm

Notes/Comments: Zero air cal gas Lot #1366017, exp.8/1/2015

SCS FIELD SERVICES

NSPS Surface Emissions Monitoring Calibration and Pertinent Data Form

Date: 01/06/14 Site: ACUA Job Number: 07211077.00

Technician(s): Ben Lock

Weather Observations

Wind Speed: 10 MPH Wind Direction: North Barometric Pressure: 30.05 "Hg
Air Temperature: 50 °F General Weather Conditions: Cloudy

Calibration Information

Instrument ID: 34945693 Span Calibration Gas Manufacturer: Landtec
Cal Gas Lot # 42138-01 Expiration Date: 5/1/2015 Cal Gas Concentration: 500 ppm

Pre-monitoring Calibration Precision Check

*Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. **The calibration precision must be less than or equal to 10% of the calibration gas value.***

Trial	Zero Air Reading (ppm)	Cal Gas Reading (ppm)	Cal Gas Conc. – Cal Gas Reading
1	-0.88	508	8
2	-0.46	503	3
3	-0.27	507	7
Average Difference:			6

$$\begin{aligned}
 \text{Calibration Precision} &= \text{Average Difference} / \text{Cal. Gas Conc.} \quad \times 100\% \\
 &= \frac{6}{500} \quad \times 100\% \\
 &= \underline{1.20} \quad \%
 \end{aligned}$$

Pre-monitoring Response Time Check

*Procedure: Introduce zero concentration methane/H2S into the instrument. Quickly change to the calibration gas. Measure the amount of time it takes the instrument to read 90% of the calibration gas concentration. **This average response time must be less than or equal to 30 seconds.***

Trial	Start Time (Add Cal Gas) (hh:mm:ss)	Time at 90% Reading (hh:mm:ss)	Time Elapsed (Seconds)
1	11:50:00 AM	11:50:12 AM	12
2	11:50:30 AM	11:50:41 AM	11
3	11:51:05 AM	11:51:14 AM	9
Average Response Time:			11

Background Concentration Checks

Upwind Location Description: North of Site on Access Road Reading: 3.26 ppm
Downwind Location Description: South of Site on Access Road Reading: 14.00 ppm
Average Background Reading: 8.63 ppm

Post-monitoring Calibration Precision Check

Zero Air Reading: -0.67 ppm Cal Gas Reading: 501 ppm

Notes/Comments: Zero air cal gas Lot #1366017, exp.8/1/2015

SCS FIELD SERVICES

NSPS Surface Emissions Monitoring Calibration and Pertinent Data Form

Date: 01/16/14 Site: ACUA Job Number: 07211077.00

Technician(s): Ben Lock

Weather Observations

Wind Speed: 5 MPH Wind Direction: East Barometric Pressure: 30.00 "Hg
Air Temperature: 33 °F General Weather Conditions: Cloudy

Calibration Information

Instrument ID: 34945693 Span Calibration Gas Manufacturer: Landtec
Cal Gas Lot # 42138-01 Expiration Date: 5/1/2015 Cal Gas Concentration: 500 ppm

Pre-monitoring Calibration Precision Check

*Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. **The calibration precision must be less than or equal to 10% of the calibration gas value.***

Trial	Zero Air Reading (ppm)	Cal Gas Reading (ppm)	Cal Gas Conc. – Cal Gas Reading
1	0.33	500	0
2	0.12	499	1
3	0.18	503	3
Average Difference:			1

$$\begin{aligned}
 \text{Calibration Precision} &= \text{Average Difference} / \text{Cal. Gas Conc.} && \times 100\% \\
 &= \frac{1}{500} && \times 100\% \\
 &= \underline{0.27} \%
 \end{aligned}$$

Pre-monitoring Response Time Check

*Procedure: Introduce zero concentration methane/H2S into the instrument. Quickly change to the calibration gas. Measure the amount of time it takes the instrument to read 90% of the calibration gas concentration. **This average response time must be less than or equal to 30 seconds.***

Trial	Start Time (Add Cal Gas) (hh:mm:ss)	Time at 90% Reading (hh:mm:ss)	Time Elapsed (Seconds)
1	10:47:00 AM	10:47:10 AM	10
2	10:47:30 AM	10:47:39 AM	9
3	10:48:00 AM	10:48:10 AM	10
Average Response Time:			10

Background Concentration Checks

Upwind Location Description: East of Site on Access Road Reading: 8.80 ppm
Downwind Location Description: West of Site on Access Road Reading: 11.20 ppm
Average Background Reading: 10.00 ppm

Post-monitoring Calibration Precision Check

Zero Air Reading: 1.2 ppm Cal Gas Reading: 499 ppm

Notes/Comments: Zero air cal gas Lot #1366017, exp.8/1/2015

SCS FIELD SERVICES

NSPS Surface Emissions Monitoring Calibration and Pertinent Data Form

Date: 02/14/14 Site: ACUA Job Number: 07211077.00

Technician(s): Keith Kleckner

Weather Observations

Wind Speed: 16 MPH Wind Direction: West Barometric Pressure: 29.50 "Hg

Air Temperature: 36 °F General Weather Conditions: Clear

Calibration Information

Instrument S/N 414006484 Span Calibration Gas Manufacturer: Lantec

Span Cal Gas Lot #: 42138-01 Expiration Date: 5/1/2015 Concentration: 500 ppm

Zero Cal Gas Lot #: 1366017 Expiration Date: 8/1/2015 Concentration: 0 ppm

Pre-monitoring Calibration Precision Check

*Procedure: Calibrate the instrument. Make a total of three measurements by alternating zero air and the calibration gas. Record the readings and calculate the average algebraic difference between the instrument reading and the calibration gas as a percentage. **The calibration precision must be less than or equal to 10% of the calibration gas value.***

Trial	Zero Air Reading (ppm)	Cal Gas Reading (ppm)	Cal Gas Conc. – Cal Gas Reading
1	1.01	497	3
2	1.21	503	3
3	0.89	504	4
Average Difference:			3

$$\begin{aligned}
 \text{Calibration Precision} &= \text{Average Difference} / \text{Cal. Gas Conc.} \quad \times 100\% \\
 &= \frac{3}{500} \times 100\% \\
 &= \underline{0.67} \%
 \end{aligned}$$

Pre-monitoring Response Time Check

*Procedure: Introduce zero concentration methane/H2S into the instrument. Quickly change to the calibration gas. Measure the amount of time it takes the instrument to read 90% of the calibration gas concentration. **This average response time must be less than or equal to 30 seconds.***

Trial	Start Time (Add Cal Gas) (hh:mm:ss)	Time at 90% Reading (hh:mm:ss)	Time Elapsed (Seconds)
1	9:28:00 AM	9:28:07 AM	7
2	9:30:00 AM	9:30:08 AM	8
3	9:31:00 AM	9:31:06 AM	6
Average Response Time:			7

Background Concentration Checks

Upwind Location Description: West Side of Site on Access Road Reading: 3.34 ppm

Downwind Location Description: East Side of Site on Access Road Reading: 6.46 ppm

Average Background Reading: 4.90 ppm

Post-monitoring Calibration Precision Check

Zero Air Reading: 1.22 ppm Cal Gas Reading: 503 ppm

Notes/Comments: _____

ATTACHMENT 3

Photographs



Exhibit 1 - EW-18R
12-27-13



Exhibit 2 - EW-53R
12-27-13



Exhibit 3 - EW-68BR
12-27-13





Exhibit 4 - EW-66R
12-27-13



Exhibit 5 - EW-88
12-27-13



Exhibit 6 - EW-88 Condensate Drip Leg
12-27-13



Exhibit 7 - EW-87
12-27-13

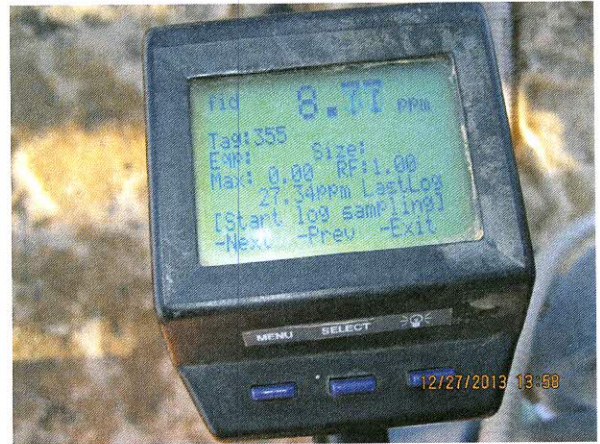


Exhibit 8 - Cell 3 Primary Pump Station
12-27-13



Exhibit 9 - Cell 3 Secondary Pump Station
12-27-13



Exhibit 10 - Crevasse Between Cells 3 and 10
12-27-13



Exhibit 11 - Base of Cell 10
12-27-13



Exhibit 12 - EW-18R
1-16-14





Exhibit 13 - EW-53R
1-16-14



Exhibit 14 - EW-68BR
1-16-14

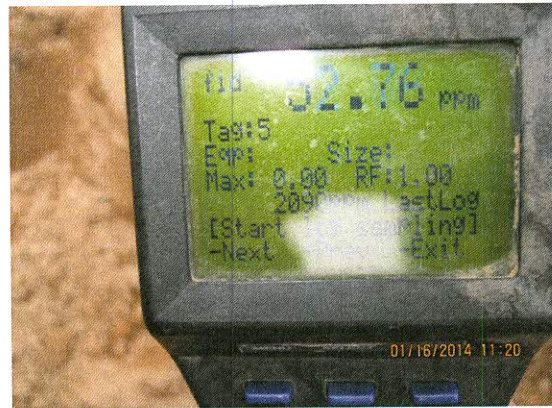


Exhibit 15 - Abandoned EW-66
1-16-14

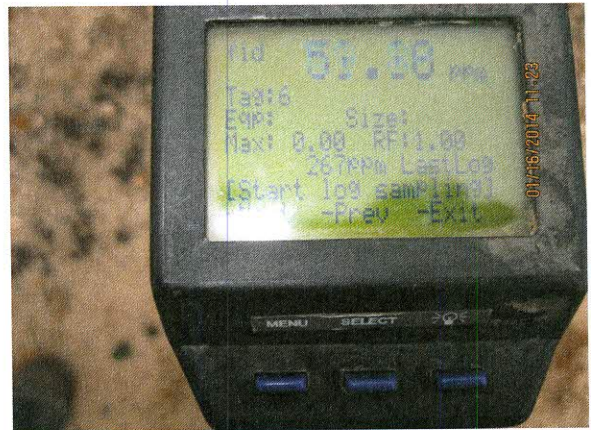




Exhibit 16 - EW-66R
1-16-14

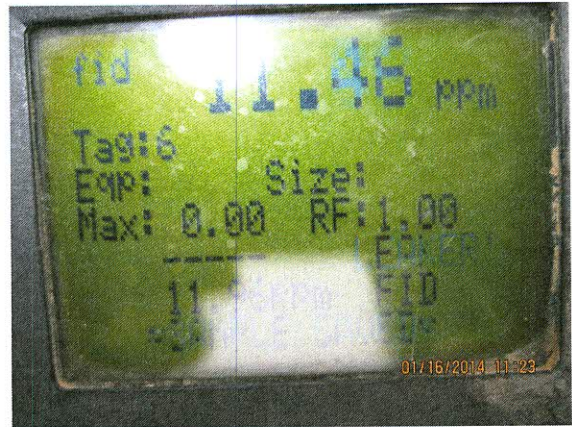


Exhibit 17 - EW-88
1-16-14

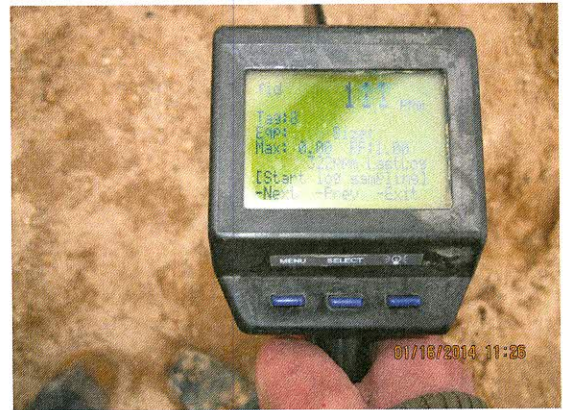


Exhibit 18 - EW-88 Condensate Drip Leg
1-16-14

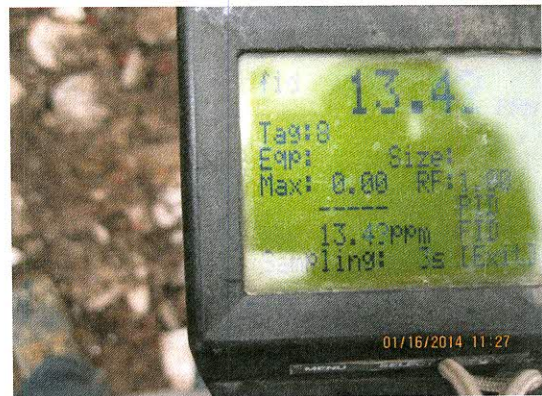




Exhibit 19 - EW-87
1-16-14



Exhibit 20 - Cell 3 Primary Pump Station
1-16-14



Exhibit 21 - Cell 3 Secondary Pump Station
1-16-14

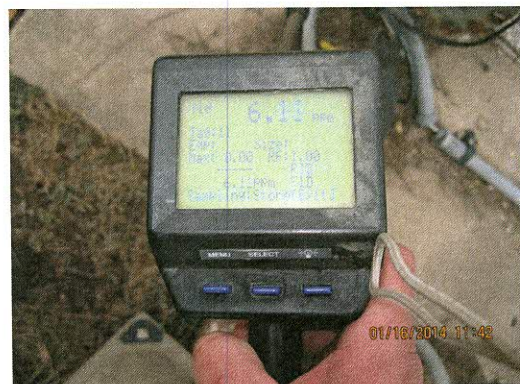




Exhibit 22 - Crevasse Between Cells 3 and 10
1-16-14



Exhibit 23 - Base of Cell 10
1-16-14

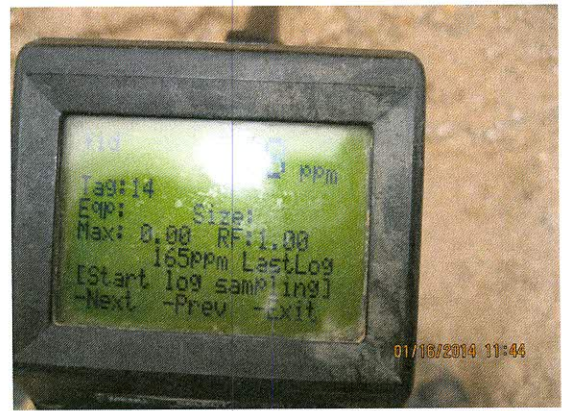


Exhibit 24 - EW-87
2-14-14

