Leak Detection and Repair (LDAR) Inspection Report

Edgeboro Landfill
(aka Cinnamon Bay LLC)
53 Edgeboro Rd, East Brunswick, NJ 08816

AIRS ID: NJ0000003402316340

Inspection Date(s): July 24, 2024

Participating Personnel:

US Environmental Protection Agency
Omer Sohail, PE, Environmental Engineer
Phillip Ritz, Environmental Scientist
Hannah Patel, Environmental Scientist

Report Prepared by:

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LDAR Inspection of Edgeboro Landfill (aka Cinnamon Bay LLC), East Brunswick, NJ

Table of Contents:

Leak Detection and Repair Report	**1-4**
Introduction	**3**
Management System Review	**3**
Technical System Audit	**3**
Compliance Monitoring	**4**
Follow–Up	**4**

Appendices

1 Inspection Attendance Sheet

LDAR Inspection of Edgeboro Landfill (aka Cinnamon Bay LLC), East Brunswick, NJ

Inspection Date:

July 24, 2024

Introduction:

The closed and capped Edgeboro Landfill is located near Edgeboro Road in East Brunswick, NJ. The closed and capped Edgeboro Landfill facility is regulated under the Federal Clean Air Act Title V Air Permit Facility ID 17901 ("Title V Permit") issued by the New Jersey Department of Environmental Protection ("NJDEP"). The Title V Permit covers the closed and capped Edgeboro Landfill as well as the nearby Power Plant facility. The Edgeboro Landfill operated from 1954 to 1993 and includes Section 1, Section 2, and Section 3.

The landfill is adjacent to the Middlesex County landfill.

Management System Review:

Objective: A management system review consists of an evaluation of the facility's current LDAR program, which includes interviews with staff responsible for overseeing the program and any staff or contractors who perform routine monitoring and data management. Documents reviewed by EPA Region 2 inspectors (hereafter referred to as inspectors) include, but are not limited to previous reports, monitoring data, monitoring runs, component leak histories, leak repair procedures, calibration gas certificates of analysis, calibration logs, calibration precision testing, and calibration response time testing.

Observations: Edgeboro Landfill's SEM contractor, Sadat Associates (Sadat) performs all surface emissions monitoring at Edgeboro Landfill Section 1, Section 2 and Section 3. Any instrument reading greater than 500 ppm is considered an exceedance. If an exceedance is found by Sadat, a GPS location is taken, the area is flagged, and William Stetson, Edgeboro Landfill Senior Project Manager, is notified.

According to Sadat, re-monitoring is performed by Sadat within 10 days. If the area passes re-monitoring, follow-up monitoring is performed in 30 days. If the area does not pass the re-check, another attempt at repair is made, and re-monitoring is performed within 10 days.

Omer Sohail reviewed the Semi Annual NSPS and SSM reports from January 2023 to January 2024, which include all quarterly surface monitoring conducted during those periods. All reports were found to be satisfactory.

Technical System Audit:

Objective: A Technical System Audit (TSA) consists of an audit of the instrumentation and calibration gases being used for routine LDAR monitoring. Calibration gases will be checked and the inspector will observe the facility LDAR technician or contractor performing a routine calibration. The procedure used to perform a calibration precision test and response time test will also be observed. This portion of the audit evaluates conformance to Method 21 of 40 CFR Part 60, Appendix A.

Observations: Edgeboro Landfill surface monitoring contractor, Sadat, was present during EPA's inspection; however, did not bring any surface monitoring equipment with them. Therefore, there are no observations to report.

Compliance Monitoring:

Objective: Inspectors perform all compliance monitoring with the facility technician or contractor present to provide confirmation of any leaks detected by EPA. The inspection will consist of side-by-side monitoring where the inspector will monitor several components immediately after the facility technician or contractor has monitored the same component. This is done to verify monitoring technique, ability to find leaks, and performance of the facility's instrument. All monitoring data are summarized in Table 1 of this report.

Observations: Side by side surface monitoring could not be conducted as Sadat did not bring the required equipment necessary for surface emission monitoring during EPA's inspection; however, EPA did continue the inspection. All results were relayed verbally in the field to Sadat's inspector Nick Morgan. Monitoring results are included in Table 1 of this report.

Calibration of the TVA2020 was completed in the field prior to starting the surface emissions monitoring. The following calibration gasses were used in the daily calibration: Zero Air, Methane 505 ppm, Methane 1025 ppm, and Methane 1% volume. Background concentrations were determined both upwind and downwind of the landfill, with results included in Table 1. A total of 29 points were monitored over the two-day period. Any reading above 500 ppm is considered a leak (§60.755(c)(4)). EPA detected 0 leaks, which equates to a leak rate of 0%.

Region 2 inspectors used GIS Map Pro on iPhone 13 to record the coordinates of each point monitored at Edgeboro Landfill. Coordinates for each point monitored can be found in Table 1.

Follow-Up:

At the closing conference held on July 24, 2024, Omer Sohail reviewed all the findings of the inspection with Lahbib Chibani, President of Sadat Associates. No leaks were identified during the inspection; therefore, an exceedance table was not sent and follow up for repairs was not required.

MCUA Landfill

East Brunswick, NJ

USEPA Inspection

Attendance Sheet (July 22 - 23, 2024)

Name	Role/ Company	Email Address	Attended Opening Conference	Attended Closing Conference
Omer Sohail	Inspector, EPA, LSASD R2	sohail.omer@epa.gov	Yes	Yes
Hannah Patel	Inspector, EPA, ACB R2	patel.hannah@epa.gov	Yes	Yes
Phil Ritz	Inspector, EPA, ACB R2	ritz.phillip@epa.gov	Yes	Yes
Lahbib Chibani	President, Sadat Associates		Yes	Yes
Nick Morgan	Scientist, Sadat Associates		Yes	Yes
William Stetson	Senior Project Manger, Edgeboro Landfill		Yes	Yes

United States Environmental Protection Agency
2890 Woodbridge Avenue, Edison, NJ 08837
Monitoring and Assessment Branch
Surface Emissions Monitoring - Leak Detection and Repair

Edgeboro Landfill (aka Cinnamon Bay LLC)
53 Edgeboro Rd, East Brunswick, NJ 08816

Date of Inspection: July 24, 2024
Weather: July 24 - Mostly Sunny, High of 84

Sample ID	Concentration (ppm)	Approximate GPS Location		Sample Location	Repaired	Notes
Upwind	1.0	40.4670	74.3857	Ambient		
Downwind	2.1	40.4281	74.2360	Ambient		
CO-6	1.4	40.2710	74.2220	Base		
CO-7	1.3	40.2810	74.2313	Base		
EW-06	1.2	40.2820	74.2330	Base		
EW-08	3.6	40.2830	74.2330	Base		
HC-3	1.2	40.2860	70.2310	Base		
GW-03	1.7	40.2890	74.2310	Base		
HC-4	1.5	40.2810	74.2310	Base		
GC-5	1.6	40.2811	70.2310	Base		
EW-20	1.5	40.2811	74.2300	Base		
EX4M1B	1.6	40.2812	74.2328	Base		
EW-27	1.7	40.2813	74.2260	Base		
EW-28	1.8	40.2814	74.2259	Base		
EW-30	0.4	40.2824	74.2258	Base		
EW-37	1.9	40.2830	74.2255	Base		
EW-40	1.9	40.2831	74.2255	Base		
GW-R7	1.9	40.2832	74.2254	Base		
EW-45	2.0	40.2836	74.2255	Base		
EW-47	2.1	40.2831	74.2211	Base		
GW-R	2.2	40.2836	74.2260	Base		
GW-NA	2.3	40.2834	74.2257	Base		
GW-R14	2.3	40.2833	74.2255	Base		
EW-9	8.7	40.2832	74.2326	Base		
PVC42M	17.1	40.2832	74.2326	Base		Background concentration from MCUA Landfill ~25 ppm
GW-N3	8.4	40.2830	74.2326	Base		
EW-82	1.7	40.2827	74.2330	Base		
EW-86	0.4	40.2827	74.2335	Base		
EW-92	6.1	40.2823	74.2330	Base		