

RULS-AD - 1984 - 395

9-11-84

Letter to Judge from EDC re: report on  
sewage

4 pgs.

# Environmental Disposal Corp.

P.O. BOX 509  
PLUCKEMIN, N.J. 07978  
201-234-0677

DT-15 enid  
11/5/84 -  
EBS

TO: The Honorable Eugene D. Serpentelli  
Superior Court of New Jersey

FROM: Neil V. Callahan, President, Environmental Disposal Corp.

RE: Environmental Disposal Corp.'s Current Expansion Program

DATE: September 11, 1984

## INTRODUCTION

Environmental Disposal Corp. (EDC) is a public sewerage utility with an existing franchise area that has been approved by municipal resolution in both Bedminster and Bernards Townships and approved by the New Jersey Board of Public Utilities (NJBPU). This franchise area covers the Southeastern portion of Bedminster and the Southwestern portion of Bernards. EDC's sole function is to provide safe and adequate sewage treatment service. To provide this service EDC has built and currently owns and operates one of the country's premier advanced wastewater treatment facility and collection system. The operation and discharge of this facility is closely monitored and reported to the New Jersey Department of Environmental Protection (NJDEP) to assure compliance with an NJDEP permit to operate and a NJPDES discharge permit. These facts are a testament to EDC's commitment to, and performance in providing sewage treatment service. EDC, based on its experience and all available information to date, remains confident that it can and will produce treatment facility capacity most expeditiously and efficiently.

## DEFINING SERVICE "NEED"

EDC, subsequent to the completion and start-up of its existing treatment facility, apart from any initiative of Mount Laurel II proceeding, began evaluating and planning for the sewer service needs of all potential customers within its franchise area. EDC's efforts were hampered initially because sewer service "need" is a function of land use, and the land use for a majority of EDC's franchise area is currently being decided by Mount Laurel litigation pending before Superior Court Judge Eugene D. Serpentelli in Allan-Deane v. Bedminster and Hills Development Company v. Bernards. EDC, therefore, has elected to use as a basis for determining the potential service need in its Bedminster service area the recommendations of

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the Special Planning Master, George M. Raymond, who was appointed by Judge Serpentelli in Allan-Deane v. Bedminster. In Bernards, EDC has relied on information supplied by The Hills Development Company (HDC) as to its potential need. EDC has found that an expansion of treatment plant capacity to 1.75 MGD is needed to service its total franchise area and the area generically known as the AT&T tract.\*

EDC, in the Bedminster portion of its service area and with the full expanded capacity available, will be able to provide service to approximately 4,100 dwelling units including 739 to 889 Mount Laurel units and approximately 950,000 square feet of commercial space.

\*This area is being considered by EDC at the request of Bedminster Township.

## EXPANSION PROGRAM DEVELOPMENT WATER QUALITY ANALYSIS

EDC having established the "need" for service in its franchise area wanted to develop a viable scenario for an expansion program. EDC posed the following question: Using the same process as the existing treatment plant, a process recognized as "Best Available Technology, economically achievable" (BAT) for domestic wastewater, is there any insurmountable water quality problems with a 1.750 MGD discharge? To answer this question, EDC contracted for a water quality analysis at the expanded discharge rate. (Raymond A. Ferrara, PhD., Water Quality Impact Assessment for The Environmental Disposal Corp. Treatment Plant Expansion, September 1984) The Ferrara report finds that for the pollutants of major concern in evaluating wastewater treatment plant discharges, Biochemical Oxygen Demand (BOD), Suspended Solids, Ammonia-nitrogen, and Dissolved Oxygen there are no significant problems even under the most critical receiving water conditions. The Ferrara report does however, identify two parameters, Total Dissolved Solids (TDS) and Total Phosphorus (TP) in which there are identifiable changes in the concentration of these parameters during the most critical receiving water conditions. Ferrara was unable to determine the specific impacts, or the effect of these changes on the receiving water uses because of the limited duration of the period of concern under which the changes would occur, and because of the problem that predictive models for pollutants of normally lessor concern in wastewater discharges, such as TDS and TP, that can determine specific impacts are not generally applicable or available. Ferrara therefore has recommended that the expanded discharge be permitted with the condition that continuous ongoing evaluation of the receiving water quality be undertaken as a requirement of an expansion permit (EDC constructed its existing treatment facility with a similar condition.)

# Environmental Disposal Corp.

## EXPANSION LAND ACQUISITION

Based on the positive water quality findings in the Ferrara report EDC began acquisition proceedings for the land identified as the primary site for a treatment plant expansion, Lot 1 Block 59A adjacent to the existing treatment facility. After vain efforts to try to locate correct property maps from the New Jersey Department of Transportation (NJDOT), the land owner, EDC opted to prepare a sketch plat of the parcels (T & M Associates, August 1984) so as not to delay the acquisition proceedings.

With the sketch plat complete EDC was able to commission the firm of Halpern and Davidson to determine the appraised value of the parcel. The present status of the discussions between EDC and NJDOT are that there is no identifiable obstacle to EDC's acquisition of the land.

There is in existence a proposed agreement regarding sewer service between Bedminster, EDC, and The Hills Development Company (HDC). A condition of this agreement is that the Township would be required to purchase the land from NJDOT and convey the land to EDC. This action would significantly reduce the time required for acquisition of land by EDC.

## PROPOSED FACILITIES

EDC is proposing to expand its treatment capacity to 1.75 MGD. EDC's proposal for providing this capacity consists of constructing two additional process trains of 0.9 MGD combined capacity on a five acre parcel of land adjacent to the present treatment plant site. Each of these two process trains would consist of unit operations similar, if not identical, to the existing Bardenpho operations. The treatment level provided by this plant is the maximum attainable by processes generally recognized as "Best Available Technology, economically achievable" (BAT) for domestic wastewater. The effluent from the expanded plant will be discharged to the same unnamed tributary of the Raritan River as the existing discharge.

## FINAL IMPACT STATEMENT & APPLICATION DEVELOPMENT

EDC to conclude program development and to begin application has contracted with the International firm of Metcalf & Eddy, Inc. for the preparation of a final Environmental Impact Statement (EIS), a NJPDES permit application, and all professional services necessary to acquire a Discharge Allocation Certificate. The EIS and applications will be completed in October 1984. Upon submission of these materials EDC will have formally begun all approval processes necessary for a treatment plant expansion to 1.75 MGD.

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## SCHEDULE FOR EXPANSION PROGRAM

The materials prepared for, and by EDC in its expansion program has been done at approximately the same schedule as was proposed in a report titled "Sewage Alternatives: Mount Laurel II Housing, Bedminster Township" by Neil V. Callahan, dated April 6, 1984. There remains no changes to that proposed schedule of forty-three months to have expanded capacity operational.

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