

October 17, 2014

Ms. Nancy Kempel
Supervising Environmental Engineer
Bureau of Surface Water Quality
Division of Water Quality
P.O. Box 402
Trenton, NJ 08625-0402

RE: NJPDES Permit No. NJ022627
Plumsted Municipal Utilities Authority
Plumsted Township, Ocean County

Dear Ms. Kempel:

Thank you and Kelly Perez for meeting with myself, Walt Bronson and Chris Jepson on Thursday October 9, 2014. The purpose for this meeting was to discuss the Pre- Draft of the Surface Water Permit we received from the Department on October 1, 2014 and, in particular, the permit limit for Total Dissolved Solids (TDS).

As a result of our meeting, the Plumsted Municipal Utilities Authority (PMUA) hereby requests an effluent limit of 1000 mg/l for TDS in the draft NJPDES permit now being developed by the Department. The justification for the request to accept 1000 mg/l is based, in part, on the requirement in the draft permit to meet the effluent value of 0.1 mg/l for phosphorous (P). In order to achieve that level of Phosphorous discharge, a large amount of chemical (alum, ferric chloride or other chemical) will be required to remove the P from the waste stream. These chemicals add a large amount of TDS to the effluent. TDS is very difficult to remove and due to the very low P levels required – the TDS levels will increase.

The draft permit also contains very stringent requirements for 4 metals (copper, lead, nickel and zinc) which will require the addition of another chemical that will greatly assist in the metals removal process, but will also add more TDS to the discharge as a result of those chemical reactions. There may also have to be some pH adjustment that takes place prior to final discharge which would add more TDS to the effluent.

Since there is no influent at this time to analyze and the water supply comes from residential onsite wells (with some chemical additions) and some public water supply (NJ American Water) – influent levels of TDS could be higher than normally anticipated. Therefore, the PMUA request for an effluent limit of 1000 mg/l for TDS will ensure the treatment facility will be in compliance when it does start up. Until the WWTP and collection system is constructed and operational and real jar testing and analysis can take place on the influent flow we feel the 1000mg/l for TDS is an appropriate effluent level and within the limits allowed by the Delaware River Basin Commission. In

the future, after some real operating data is obtained – we would be willing to discuss with the Department a lowering of this requirement, if appropriate.

Please feel to contact me or Chris Jepson if you should have any questions.

Sincerely,

Peter Ylvisaker

Cc: Plumsted MUA

Kelly Perez, NJDEP

Chris Jepson, Van Cleef