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STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
RICHARD T. DEWLING, Ph.D., P.E., COMMISSIONER
CN 402
TRENTON, N.J. 08625
609 - 292 - 2885

(IN THE MATTER OF AMENDMENT 86-4)
(TO THE ADOPTED AND APPROVED SOLID)
(WASTE MANAGEMENT PLAN OF THE)
(BURLINGTON COUNTY SOLID WASTE)
(MANAGEMENT DISTRICT)

MODIFIED CERTIFICATION
OF AUGUST 13, 1986 AMENDMENT
TO THE BURLINGTON COUNTY DISTRICT
SOLID WASTE MANAGEMENT PLAN

BY ORDER OF THE COMMISSIONER:

A. Introduction

The New Jersey Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) (SWMA) establishes a comprehensive system for the management of solid waste and sludge in New Jersey. The Act designates all twenty-one (21) of the state's counties, and the Hackensack Meadowlands District, as Solid Waste Management Districts, and mandates that the Board of Chosen Freeholders and the Hackensack Meadowlands Development Commission develop comprehensive plans for waste management in their respective districts. The SWMA requires the State to develop a State Solid Waste Management Plan which includes a sludge management component. The New Jersey Water Quality Planning Act (N.J.S.A. 58:11A-1 et seq.) provides for the development of a statewide sludge management plan. Pursuant to these Acts, the Department developed the Statewide Sludge Management Plan (SSMP). The SSMP was adopted on November 4, 1987. District sludge management plans must be consistent with the SSMP pursuant to both the State Solid Waste Management Act and the State Water Quality Planning Act.

On October 27, 1980, the Department approved, with modifications, the Burlington County District Solid Waste Management Plan as consistent with the State Solid Waste Management Plan.

The SSMP requires that all district plans set forth the current sludge management conditions in the district, and include the strategy to be followed by the district in meeting its long term sludge management needs. The district plans must detail the current and long term sludge production projections for the district, inventory and appraise all facilities and operations within the district and analyze the

collection and transportation systems which serve the district. The management strategy must include the maximum practicable use of resource recovery techniques. In addition to this strategy, the district plan must designate sufficient available suitable sites for the management of the district's long term sludge projections. These sites may be in the district or in another district if sufficient sites are not available in the district, provided the necessary interdistrict agreements are executed pursuant to the SWMA. If the district cannot locate sufficient suitable sites, the district must certify failure pursuant to the SWMA.

The Burlington County Board of Chosen Freeholders (District) completed its Sludge and Septage Management Plan, and on August 13, 1986, adopted it as an amendment to its approved district solid waste management plan. Also included in the District's Sludge and Septage Management Plan are various proposed modifications which address solid wastes other than sludge. At the same time, other amendments were adopted which proposed inclusion of the district's recycling plan, a waste flow redirection to the Fort Dix Heat Recovery Incinerator, and a financial plan for disbursement of funds from the District's resource recovery investment tax fund.

The amendments were received by the Department on August 29, 1986, and copies were distributed to various state level agencies for review and comment, as required by law. On October 29, 1986, Burlington County requested by letter, that the Department process the Sludge and Septage Management Plan separately from the other plan amendments. This request was made to allow for expedited certification of the other amendments since the Sludge and Septage Management Plan component of the District's submission required a more complex substantive review. On December 5, 1986, the Department certified approval of the District's recycling plan, waste flow redirection to the Fort Dix Heat Recovery Incinerator, and resource recovery investment tax fund financial plan.

This certification addresses the District's Sludge and Septage Management Plan.

The Division of Solid Waste Management circulated the Sludge and Septage Management Plan along with the other solid waste plan amendments to seventeen review agencies and solicited their review and recommendations. Pursuant to N.J.S.A. 13:1E-24a(2) and (3), these agencies, bureaus and divisions within the Department, the Board of Public Utilities, the Departments of Community Affairs, the Public Advocate, Health, Agriculture, Transportation, the Office of Recycling, the Pineland Commission, the New Jersey Advisory Council on Solid Waste Management, U.S. EPA, and the New Jersey Turnpike Authority. Of these agencies, the following did not object to the proposed plan amendment: NJDEP Divisions of

Environmental Quality, Fish, Game and Wildlife, Parks and Forestry and Coastal Resources; the Departments of Agriculture, Health, Community Affairs, and Transportation; the Board of Public Utilities; and the Office of Recycling.

The following agencies failed to respond to our requests for comments: the Department of the Public Advocate, the Green Acres Program, the Pinelands Commission, the New Jersey Turnpike Authority, the New Jersey Advisory Council on Solid Waste Management and the U.S. Environmental Protection Agency.

The Division of Water Resources (DWR) submitted substantive comments which cited numerous deficiencies in the Burlington County Sludge and Septage Management Plan. The Department issued a certification which detailed these deficiencies on January 26, 1987. On November 4, 1987, the SSMP was adopted and the Department has reevaluated the District's Sludge and Septage Management Plan for consistency with the adopted SSMP. The Department has again determined that deficiencies exist as discussed in section C of this certification.

These deficiencies include both technical and legal issues that must be addressed before the Department gives full approval of the District's proposed plan for the management of sludge and septage. In response to the concerns raised by the DWR, the Department has determined that the amendment is approved in part, modified in part and rejected in part as provided in N.J.S.A. 13:1E-24.

B. Findings and Conclusions with Respect to the Burlington County District Solid Waste Management Plan Amendment

Pursuant to N.J.S.A. 13:1E-24a(1), I, Richard T. Dewling, Commissioner of the Department of Environmental Protection have studied and reviewed Amendment 86-4 to the Burlington County District Solid Waste Management Plan (plan amendment) and have been guided by the objectives, criteria, and standards developed in the State Solid Waste Management Plan which includes the Statewide Sludge Management Plan. I find and conclude that parts of this plan amendment are consistent and others inconsistent with the State Solid Waste Management Plan and Department policies as further addressed in Section C. of this certification.

C. Certification of Burlington County District Solid Waste Management Plan Amendment

I, Richard T. Dewling, Commissioner of the Department of Environmental Protection, in accordance with N.J.S.A. 13:1E-1 et seq., which establishes specific requirements regarding the contents of the district solid waste management

plans, have reviewed the August 13, 1986 amendment to the approved Burlington County District Solid Waste Management Plan and certify to the Burlington County Board of Chosen Freeholders that the August 13, 1986 amendment is approved in part modified in part and rejected in part as set forth below.

1. Approved Portions of the Burlington County Plan Amendment

- a. Preamble: This section of the District's Sludge and Septage Management Plan is approved. The Department however, does not approve, adopt or in any way take a position on the legal discussions contained in this section or in any other section of the District plan amendment.
- b. Inventory: The information presented in section 1.0 regarding sources of sludge generated within the District is approved for plan inclusion. However, the District is directed to modify the sludge production estimates and quality information as detailed in C.2.b below. The District's proposal to achieve the Department's quality criteria for land application and distribution of sludge and sludge products through mixing and blending of the various qualities of sludge to be co-composted is rejected as detailed in C.2.b below.
- c. Existing Facilities: The discussion of existing facilities contained in section 2.1 is approved for plan inclusion with the exceptions discussed in C.2.c below.
- d. Terminated Facilities: The discussion of terminated facilities presented in section 2.2. is approved for plan inclusion.
- e. Planned Facilities: The discussion of planned facilities in section 2.3 is approved for plan inclusion with the exceptions discussed in C.2.e. below. The District has proposed a co-composting project for the processing of municipal solid waste and dewatered sludge to be located on Block 174, Lot 3, in Florence Township. The inclusion within the plan of this project is consistent with the prior Department certification of April 18, 1983 which approved the Burlington County Solid Waste Management Facilities Complex and is therefore approved. This approval is conditioned and the plan amendment is modified as follows:
 - 1) The construction and operation of this project must be preceded by the acquisition of all necessary permits and approvals pursuant to N.J.S.A. 13:1E-1 et seq., N.J.S.A. 58:10A-1 et seq., N.J.S.A. 26:2C-1 et seq., and all other applicable statutes and regulations.
 - 2) Issuance of operating permits is limited to those applications found by the Department and the Attorney General to be deserving of licensing under

N.J.S.A. 13:1E-126.

- 3) Any sludge accepted at this site must meet the Department's land application criteria and the system must produce a stabilized product in accordance with 40 CFR Part 257.
- f. Maps: The maps in section 2.4 are approved for inclusion in the plan except as directed to be modified in C.2.f. below.
- g. Transportation and Collection: The District has set forth existing and projected collection systems, routes and costs for sludge and septage in section 3.0 of the plan. The District has not, however, included a routing study indicating specific routes to be utilized by private and public haulers from all treatment plants which are to use the co-composting facility and land application sites as discussed in C.2.g below. Accordingly, the transportation and collection of sludge and septage, with the exception of projected routes and costs of transporting sludge to the co-composting facility and land application sites, is approved for plan inclusion. Approved also is the District's policy on transfer stations.
- h. Solid Waste Disposal Strategy: In section 4.0 of the plan amendment the District has proposed a solid waste disposal strategy that calls for reliance upon a County-owned complex of solid waste facilities (co-composting facility, sanitary landfill, intermediate processing facility and bulky waste processing facility) to meet the District's long-term solid waste management needs. The strategy adopted by the District is consistent with a prior Department certification issued April 18, 1983, which approved the Burlington County Solid Waste Management Facilities Complex with the exception of the sludge management strategy. The solid waste non-sludge disposal strategy is therefore approved for inclusion within the plan. The sludge management strategy is partly approved, and partly rejected as discussed in C.2.h below.
- i. Waste Flow Program - This section of the plan amendment is approved for inclusion except as discussed in C.2.i below.
- j. Financing of Solid Waste Management Alternatives: The financing strategies discussed in section 6.0 of the plan amendment are approved for inclusion in the plan except as directed to be modified in C.2.j. below.
- k. Procedures, Standards and Implementation: Section 7.0 of the plan amendment is adopted except as discussed in C.2.k. below. Approved for inclusion are the designation of supervising implementation agency and constituents of the District's Solid Waste Advisory Council to adequately address sludge interest groups.

3. Rejected Portions of the Burlington County Plan Amendment

- a. Preamble: As stated in C.1.a above, no portions of this section are rejected.
- b. Inventory: The quality data contained in the Plan amendment is rejected from plan inclusion because it is inconsistent with the SSMP. The District is directed to modify the plan amendment as follows:

Each of the treatment plants whose sludge is to be managed through land application or co-composting (the District's two selected management alternatives) must obtain a determination that their sludge is suitable for these management alternatives. The plan amendment must provide enough quality data for the Department to determine whether the sludge quality is consistent with the Department's established quality criteria for land application and distribution in all 25 parameters for which there are criteria.

The quality data contained in the plan amendment must be updated before a determination can be made on sludge quality issues. The plan amendment includes quality data for only 29 of the 47 treatment plants located in the District and 15 of those 29 contain information on only the solid phase (which excludes liquid phase data). Moreover, all data submitted was from 1981 and 1982. This data may not be representative of current sludge produced due to changes in treatment processes and waste stream composition. The District is directed to use more current data. Additionally, the District submitted data on only 18 of the requisite 25 parameters. All 25 parameters must be included in the plan amendment for it to receive Departmental approval.

The District has acknowledged in the Plan that pretreatment may be required by some treatment plants to achieve the land application and distribution quality criteria but has not identified those treatment plants or what parameters are of concern. The SSMP requires that these treatment plants be identified and an analysis of the necessary pretreatment be included. For guidance on what information should be included in the plan regarding pretreatment issues, the District is referred to Appendix K of the SSMP.

To qualify all sludges produced in the District for land application or composting management alternatives, the plan amendment includes a table of weighted averages (Table 1-4) which indicates that the District intends to use sludge which does not meet the SSMP's quality criteria for the selected management alternatives. Any attempt to mix C quality sludge with A and/ or B quality sludge to meet A & B quality criteria is inconsistent with established Department procedures and

policies as presented in the SSMP and is therefore rejected from plan inclusion.

Additionally, the District is directed to modify the sludge projections in the plan amendment. The long term sludge projections in the SSMP are almost double those reported by the District. The SSMP estimates were not challenged by the District when it reviewed the Draft Statewide Sludge Management Plan so the Department considered the District to be in agreement with the Department on these figures. As required by the SSMP, the District should either follow the SSMP in deriving these projections or more fully explain the derivation of their own per capita sludge production figure, which differs significantly from that given in the SSMP. An approach based on the algorithms presented in the SSMP (Table 3-6) is preferred by the Department because this approach takes the various treatment-processes into consideration and the amount of flow treated by each type of process. The per capita approach relies on averaging the various treatment processes.

The plan amendment does not include an inventory of sludge handling equipment as required by the SSMP. Of particular importance to the Department would be an inventory of all dewatering equipment presently located at treatment plants within the District and the percent solids the equipment is capable of achieving. This information is necessary to insure that the co-composting system will have sufficient capacity to handle the projected sludge volumes.

- c. Existing Facilities: The District's discussion of existing sludge management facilities and operations within the

District is rejected because it is inconsistent with the Table of NJDEP Approved Facilities and Operations which is contained in Part 6 of the SSMP. All sludge management alternatives listed on this Table must be included by the District unless the District can demonstrate to the Department's satisfaction that the site is not operated and maintained in compliance with all applicable health and environmental standards. Accordingly, the plan amendment must be modified to include the following permitted sludge management alternatives:

<u>NJPDES Permit #</u>	<u>Site Name</u>
NJ0054305	Rancocas State Park land application site
NJ0024660	Burlington City reed beds
NJ0027481	Beverly City reed beds
NJ0021610	Borough of Riverton reed beds
NJ0027375	Johnstone Training Center reed beds

Also, the SSMP requires that this section of the plan amendment be modified to contain a complete discussion of all storage installations located within the District including

those located at NJPDES permitted land application sites NJ0057801 and NJ0052021. The discussion of permit # NJ0057801 must exclude the terminated portions of the site.

Additionally, the plan amendment is hereby modified to reflect that land application sites are "operations" and not facilities.

- d. Terminated Facilities: As stated in C.1.d, no portion of this section has been rejected from plan inclusion or needs modification.
- e. Planned Facilities: This section of the plan amendment must be modified to include a determination concerning continued use of existing reed beds located at the treatment plants as listed in C.2.c above.

The SSMP requires the plan amendment to address dewatering and homogenization of sludge prior to introduction into the co-composting system. Homogenous mixing is necessary to achieve uniform aeration, required temperatures, odor control and a marketable product. The percent solids of sludge entering the site is fundamental to designing the composting system because design parameters will have to consider the solids content of the mixture to be composted. Additional dewatering equipment may be necessary at various treatment plants to reach the required solids content.

The District's implementation schedule is not consistent with the SSMP. The District must modify its schedule to include all the items discussed in Part 6, Section III.E.4 of the SSMP. For guidance, the District is referred to Form I-2 of Appendix K of the SSMP.

- f. Section 2.4: Map #1 of this section is hereby modified as follows:
 - 1) All existing reed beds and storage installations as well as the Rancocas State Park land application site are included; and,
 - 2) The title of the Map is changed to reflect that terminated sites are included.

Also in this section, on Table 2-1, the acreage of Pemberton Township MUA's Jones Farm must be included.

- g. Transportation and Collection: The plan amendment states that a traffic routing and cost analysis study was to be prepared by Horner & Canter Associates for the District and submitted by July 1986. Since the Department has not received this study, it can not make a decision on the District's transportation and collection analysis. The District is directed to modify the plan amendment to include the transportation analysis required by the SSMP. For

guidance on addressing transportation analysis, the District is referred to Appendix K of the SSMP.

- h. Solid Waste Disposal Strategy: The sludge management portion of this section of the plan amendment is partly rejected and the District is directed to modify the plan amendment to conform with the SSMP as follows:

The contingency planning and emergency measures discussed in the plan amendment are inconsistent with the SSMP. The adopted SSMP requires that contingency measures be developed for anticipated downtime at the management sites. Emergency measures are to be addressed on a case by case basis under the guidelines set forth in Part 4-VIII of the SSMP. This represents a change from the Draft SSMP. The plan amendment addresses contingency and emergency situations in a manner which is not consistent with the new requirements contained in the adopted SSMP and thus should be modified to conform to these requirements.

The District's reliance on landfilling as a contingency measure in anticipated situations is inconsistent with the SSMP. The SSMP states that landfilling may only take place in emergency situations as determined by the Department on a case by case basis.

The plan amendment must contain a more complete analysis of where sludge from each management site will be taken when that management site is down for routine maintenance. If storage is to be used as the contingency for those situations, the location and capacity of each storage installation must be given. If another management site is to be used, that site must be stated. For guidance on how to present this contingency information and how to determine adequacy of contingency capacity, the District is referred to the Forms in Appendix K of the SSMP.

Since Mount Holly Sewage Authority holds a NJPDES permit for distribution of its sludge derived product, the adequacy of contingency management is dependent on the implementation of a pretreatment program to qualify Mount Holly's sludge derived product for agricultural distribution. Accordingly, the District is directed to modify the plan amendment to include information on Mount Holly Sewage Authority's pretreatment program plans. For guidance on how to present this pretreatment information, the District is referred to the Forms in Appendix K of the SSMP.

The plan amendment's requirement that generators of sludge which does not meet the Department's land application and distribution criteria enter into consent agreements with the Department does not conform to the SSMP. The SSMP requires specific information on the quality parameters being violated by each treatment plant, the likely sources of those

contaminants and the date when the treatment plant will comply with the quality criteria for the selected management alternative. For guidance on development of this portion of the plan, the District is referred to Forms IS-11a, IS-11b and S-6 of Appendix K of the SSMP. Additionally, the Department has numerous enforcement alternatives to address quality violations, and entering into an administrative consent order is only one alternative. The Department rejects the plan amendment's attempt to limit its discretionary power in this regard.

As to the plan amendment's requirements regarding management of out of county sludge within Burlington County, the plan amendment is modified to reflect the ultimate authority of the Commissioner to determine a suitable location for solid waste management sites outside of a county which has certified failure to locate the solid waste management site in another district, pursuant to N.J.S.A. 13:1E-21.

- i. Waste Flow Program: The waste flow program which encompasses the period between plan amendment approval and implementation of the selected management alternatives is inconsistent with the SSMP, Part 6, section VI and is therefore rejected. The District is directed to conform this section to the SSMP as follows:

The contingency planning and emergency measures discussed in the plan amendment are inconsistent with the SSMP. The adopted SSMP requires that contingency measures be developed for anticipated downtime at the management sites. Emergency measures are to be addressed on a case by case basis under the guidelines set forth in Part 4-VIII of the SSMP. This represents a change from the Draft SSMP. The plan amendment addresses contingency and emergency situations in a manner which is not consistent with the new requirements contained in the adopted SSMP and thus should be modified to conform to these requirements.

The District's reliance on landfilling as a contingency measure in anticipated situations is inconsistent with the SSMP. The SSMP states that landfilling may only take place in emergency situations as determined by the Department on a case by case basis.

Table 5-1 in this section must be modified to eliminate references to landfilling as a contingency alternative. Also, the terms "existing facility" and "alternative exist." should be defined or replaced. The table must specify primary and contingency management alternatives to be used by each of the treatment plants rather than primary, secondary and tertiary alternatives. The reed beds located at various treatment plants in the District as discussed in C.2.b. above, must also be taken into consideration here. The

District's intention regarding future use of the reed beds must be indicated.

The discussion of rate of return for the existing land application operation located in the District contained in this section of the plan amendment on page 137 is modified to include the qualification that the Board of Public Utilities does not regulate land application sites.

- j. Financing of Solid Waste Management Alternatives: The plan amendment is inconsistent with the SSMP in its financial discussion. The plan amendment must be modified to include an analysis of operation and maintenance expenditures, such as routine maintenance of the co-composting system and process monitoring costs, in addition to the capital costs discussed in the plan amendment. Also, the SSMP requires a financial component of all district sludge management plans to include a certification from a Certified Public Accountant (see Part 6, section III.E.4 of the SSMP).
- k. Procedures, Standards and Implementation: The siting criteria discussed in the plan amendment at section 7.9.9 is inconsistent with the Department's technical criteria for land application sites presented in the SSMP at Part 3, Section II.B.8, Part 4-II, Section VI, and Appendices A-1 and A-4 and in the New Jersey Pollutant Discharge Elimination System Permit regulations (N.J.A.C. 7:14-10.8). This section of the plan must be revised to be consistent with the SSMP.

The Department's procedures for sludge management plan amendment have not yet been finalized. They will be included in the Sludge Management Regulations currently being developed by the Department. Therefore, the Department reserves approval or rejection of the plan amendment's procedures for amending the plan until the Regulations are adopted.

D. Other Provisions Affecting the Plan Amendment

1. Contracts

Any contract renewal or new contract for solid waste collection or disposal which is inconsistent with the plan amendment and which was executed prior to the approval of this amendment and subsequent to the effective date of the SWMA (July 29, 1977) and which is for a term in excess of one year, shall immediately be renegotiated in order to bring it into conformance with the terms and provisions herein set forth. Any solid waste collection operation or disposal facility registered by the Department and operating pursuant to a contract as herein described, shall be deemed to be in violation of this amendment and of the Burlington County District Solid Waste Management Plan if renegotiation is not

completed within ninety (90) days of the effective date of plan amendment approval; provided, however, that any such registrant may, upon application to the Department, and for good cause shown, obtain an extension of time to complete such renegotiation.

2. Compliance With The SSMP and Approved Portions of the Plan Amendment

All solid waste facility operators and collector/haulers registered with the Department and operating within Burlington County and affected by this amendment shall operate in compliance with the SSMP and the approved portions of this amendment and all other approved provisions of the Burlington County District Solid Waste Management Plan. Any facility operator or collector/hauler who fails to comply with the SSMP or with the provisions contained herein shall be deemed to be in violation of N.J.S.A. 13:1E-1 et seq., N.J.A.C. 7:26-1 et seq., and of their registration to operate a solid waste facility or a collection system issued by the Department and shall be subject to the provisions and penalties of N.J.S.A. 13:1E-9, 12 and all other applicable statutes. Pursuant to N.J.S.A. 13:1E-20a(1), the amendment is subject to further review, including modification or rejection, at any time.

3. Types of Solid Wastes Covered by the District Solid Waste Management Plan

The provisions of the Burlington County District Solid Waste Management Plan and Sludge Management Plan component shall apply to all solid wastes defined in N.J.S.A. 13:1E-3 and N.J.A.C. 7:26-2.13 and shall apply to sewage sludge and septage. The provisions apply exclusively to sewage sludge and septic tank clean out wastes. Also, all non-hazardous materials separated at the point of generation for sale or reuse are excluded from the waste flows designated in the Interdistrict and Intradistrict Solid Waste Flow Rules (N.J.A.C. 7:26-6).

4. Certification to Proceed with the Implementation of Plan Amendment

This document constitutes the Commissioner's certification to the Burlington County Board of Chosen Freeholders pursuant to N.J.S.A. 13:1E-24c and f, the District shall implement the approved portions of the amendment.

5. Definitions

For the purposes of this certification and unless the context clearly requires a different meaning, the definitions of terms shall be the same as those found at N.J.S.A. 13:1E-3 and and N.J.A.C. 7:26-1.4 and N.J.A.C. 7:26-2.13 and the SSMP.

6. Effective Date of Amendment

The approved portions of the plan amendment contained herein shall take effect immediately.

7. Reservation of Authority

Nothing contained herein shall be construed as a limitation on any other action taken by the Department pursuant to its authority under the law. The Burlington County District Solid Waste Management Plan, including any amendment made thereto, shall conform with the Statewide Solid Waste Management Plan including the SSMP.

E. Certification of Approval in Part and Rejection in Part of the Amendment by the Commissioner of the Department of Environmental Protection

In accordance with the requirements of N.J.S.A. 13:1E-1 et seq., I hereby approve in part, modify in part and reject in part the plan amendment as outlined in Section C of this certification to the Burlington County Board of Chosen Freeholders. I further direct the Burlington County Board of Chosen Freeholders to remedy the deficiencies enumerated in Section C of this certification. Pursuant to N.J.S.A. 13:1E-24d, I am exercising my discretion in determining that no public hearing is necessary because the required modifications and the rejected portions of the plan amendment are minor, since, for the most part, the District is being required to submit additional information. Upon review of this additional information, my determination may change if the additional information indicates that major modifications must be made to the District's plan before I will approve it.

6/15/88
DATE

Richard T. Dewling
RICHARD T. DEWLING.
COMMISSIONER
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Let's protect our earth



STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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June 15, 1988

Honorable Francis L. Bodine, Director
Burlington County Board of Chosen Freeholders
County Office Building
49 Rancocas Road
Mount Holly, New Jersey 08060

Dear Director Bodine:

Enclosed is the modified certification of the Burlington County's Sludge and Septage Management Plan (Amendment 86-4) which was adopted by the Board on August 13, 1986. The certification approves in part and rejects in part the plan amendment. The Department has approved the concept of the district sludge and septage management plan, but has rejected specific components which have been determined to be inconsistent with the Statewide Sludge Management Plan. The inconsistencies are discussed in Section C of this certification and must be resolved prior to full approval of the plan amendment.

I would like to commend you and the other freeholders, and your solid waste management staff for continuing to improve the quality of solid waste management in Burlington County.

Sincerely,

Richard T. Dewling
Richard T. Dewling

enclosure