

# Questions from External Team Meetings

## NJPDES CSO Reporting

**1.** How is snow required to be reported on the Discharge Monitoring Report (DMR) for the purposes of precipitation?

**Answer:** Permittees must use a rain gauge capable of recording precipitation amounts from snowfall as well as rain. This could include a rain gauge that allows the snow to melt so that inches of melted snow and precipitation can be uniformly reported. Alternatively, if the rain gauge reports precipitation and snowfall separately, then the snowfall amount shall be converted to water so that the total amount of precipitation, which includes snowfall, shall be reported on the DMR for that particular month.

**2.** Do rain gauges need to be officially certified or approved in order to be used? In other words, if a Combined Sewer Overflow (CSO) permittee wants to install a rain gauge at town hall, do the rain gauges need certification?

**Answer:** No. Rain gauges do not need to be officially certified but they shall be installed and calibrated according to the appropriate calibration kits and/or methods recommended by the rain gauge manufacturer. The frequency of calibration shall be performed as recommended by the rain gauge manufacturer and calibration sheets shall be included in the permittee's O&M Manual. Additionally, if more than one rain gauge is to be used, Department approval must occur so that an additional row can be included on the DMR. The rain gauge must be representative of the permittee's combined sewer system where larger combined sewer systems may benefit from more than one rain gauge.

**3.** Is it acceptable to use airport rain data or other airport rain data?

**Answer:** If the airport is within or nearby the permittee's combined sewer system that would be an acceptable rain gauge location. In all cases the rain gauge must be located in an area that is representative of the permittee's combined sewer system.

## NJPDES CSO Reporting (continued)

**4.** How should solids/floatables (S/F) be reported on the DMR when S/F from an outfall(s) are disposed into the same dumpster as materials that are not associated with the permittees' CSO outfall(s) (for example, S/F from another permittee's CSO or other non-CSO trash)?

**Answer:** The permittee needs to estimate how much is in the dumpster then pro-rate each permittee's S/F contributions. The permittee shall then certify the accuracy of the estimate by signing the DMR. Note that the objective of this requirement is to report to the Department all S/F that are disposed from CSO outfalls on a statewide basis.

**5.** Given a situation where permittees weigh S/F material prior to disposal, can a conversion factor be used to convert tons to cubic yards for S/F monitoring and reporting on the DMR?

**Answer:** Yes. A conversion factor can be used on a case-by-case; however the permittee must comply with the Recordkeeping requirements in Part IV-CSM of the permit to document the weight of the material and the method used to calculate the conversion factor.

**6.** When permittees replace and dispose S/F nets in a dumpster due to damage (e.g. due to rodents) and the nets do not have S/F within them, does the volume/weight of the empty net need to be considered in the total volume reported on the DMR?

**Answer:** Since the nets do not contain S/F, the volume/weight of the empty nets would not have to be considered in the total volume reported on the DMR.

**7.** Do S/F nets, S/F frames, and void space in a dumpster need to be reported on the DMR?

**Answer:** No. However, the permittee should estimate the actual S/F amounts then certify that the estimate is accurate by signing the DMR.

**8.** Would it be acceptable to use the volume or capacity of the nets to estimate the volume of S/F?

**Answer:** Yes. For those permittees removing S/F through the use of nets, the capacity of the nets (in a full condition) can be obtained from the netting manufacturer. For example, a 30" x 30" x 78" nominal length net from Fresh Creek Technologies has a capacity of 25 ft<sup>3</sup> (0.93 yd<sup>3</sup>). For a less than full condition, the permittee can estimate the amount of S/F captured by the net. Again, the permittee would certify that the estimate is accurate by signing the DMR.

## NJPDES CSO Reporting (continued)

**9.** The Department has instructed CSO permittees to leave certain fields on the DMR blank when submitting these forms (i.e. all open fields for the “Lab Certification #” parameter and, for all other parameters, all open fields under the “No. Ex.” column). However, when filling out a DMR electronically in the past, I received an error message indicating that fields within the DMR are blank. How should I proceed?

**Answer:** Leaving these fields blank should not generate an error message. However, if an error message is received, it should not prevent the permittee from electronically validating or locking the DMR and, as such, the permittee will be able to proceed with submission of the form electronically. If a permittee is unable to validate or lock the DMR, they are encouraged to contact the Office of Permit Management 609-984-4428 so that the problem may be rectified.

**10.** If forms are electronically submitted through the Department’s Monitoring Report Form submission service (<http://www.state.nj.us/dep/online>), can the submitted forms be accessed online?

**Answer:** No. Once a DMR form is uploaded and certified it cannot be viewed online. In order to view the submitted DMR, the permittee will have to rely on a copy saved to their hard drive. Alternatively, results from the DMR can be viewed through various reports available on NJDEP’s Data Miner website (<http://www.nj.gov/dep/opra/online.html>).

**11.** For those permittees who are reporting “Duration of Discharge” based on the use of flow meters or sensors, should they still report “estimated”, rather than “measured”, for the sample type on the DMR?

**Answer:** Yes. Reporting “estimated” as a sample type is acceptable in all cases for “Duration of Discharge”.

**12.** How does information reported for “Duration of Discharge” relate to the Presumption Approach as part of the Long Term Control Plan (LTCP)?

**Answer:** “Duration of Discharge” is intended to be an estimate of the level of CSO discharge activity at each of the permittee’s CSO outfall locations, expressed as Number of Days, and has been included on the DMR consistent with the Nine Minimum Controls (NMCs). The “Duration of Discharge” information is not used for the LTCP.

**13.** Can the Department create a template for quarterly progress reports to ensure that the expected components are achieved?

## **NJPDES CSO Reporting (continued)**

**Answer:** Yes. The Department will create a template and will distribute it to all permittees and post it on-line.

**14.** What if it snows or rains in one month but the discharge from CSO outfall(s) does not occur until the next month? Should this scenario be reported any differently?

**Answer:** No. The permittee should report precipitation from any snow and/or rain event in the month for which that precipitation occurred. The Department recognizes that there may be instances where the CSO discharge will not occur until the following month particularly with precipitation events that occur towards the end of the month.

## **Ownership**

**15.** If a sewage treatment plant (STP) covers multiple towns, who is responsible for submitting the map which depicts combined versus separate areas? Why is this requirement in the STP permit when the municipality would have the map?

**Answer:** This requirement is specified at Part IV.D.2.b. Each permittee is only responsible to submit the map for that portion of the sewer service area that they own/operate. If the STP owns a portion of the sewer system that is located in a particular municipality, then the STP is only responsible to depict the separate versus combined areas for that portion of the system that they own/operate. However, it would be beneficial if multiple owners of a combined sewer system in a municipality work together to create a single map which could then be submitted by each permittee.

**16.** What is a permittee's responsibility if another entity owns/operates a section of the infrastructure within the system? For example, consider a trunk line that conveys wastewater to a STP that is owned/operated by another entity (i.e. unpermitted municipality). Who is then responsible for identification of significant indirect user (SIU) dischargers within that section of the trunk line?

**Answer:** Each permittee is only responsible for identifying the SIUs that are located in the portion of the sewer system that they own/operate. However, if a permittee knows of SIUs that discharge into another municipality's collection system which then flows into the permittee's system (upstream of a CSO outfall), any information related to that SIU can be included on the spreadsheet that is required as one of the NMC requirements at Part IV.F.1.f.vii.

## Public Participation and Notification

**17.** For the purposes of the public participation requirement as part of the LTCP, is it acceptable to simply propose holding three public hearings during the life of the permit?

**Answer:** No. Public participation requirements are described in the NJPDES CSO permit (Part IV.G.2). Permittees are expected to involve the public through more methods than just public hearings. The permit requires the formation of a Supplemental CSO Team, and public participation must occur throughout each of the three steps of the LTCP process. Permittees must also review, update and recertify any previously submitted Public Participation Plans. Contact your CSO team leader for additional information.

**18.** I own/operate an STP which includes one municipality that has a NJPDES CSO permit and another that is interconnected to the combined sewer system but does not have a NJPDES CSO permit due to a lack of outfalls. Would it be acceptable to include information as to who to call regarding complaints for CSOs in my customer's sewer bill for both municipalities to help ensure that this information is disseminated?

**Answer:** Yes. This information can be included on sewer bills to help inform the public.

## Ambient Monitoring

**19.** Some wastewater treatment plants that receive CSO permits do not own or operate any CSO outfalls. Are these plants required to provide ambient data upstream and downstream of their regular sanitary discharge point? Or is this study limited to just CSO discharges?

**Answer:** The LTCP ambient monitoring requirements at Part IV.G.1. and 9 are designed to assess the CSO discharge impacts to the receiving waters. There is no specific monitoring required to be done upstream and downstream of the STP sanitary discharges as set forth in the guidance document available at <http://www.state.nj.us/dep/dwq/pdf/cso-receiving-water-mon-work-plan-guid-03-2015.pdf>. However, the ambient monitoring program should be designed such that the location of the sanitary discharges, and any other sources, within the study area are identified.

## O&M Due Dates

**20.** The CSO Submittal Summary as included in the March 12, 2015 final permit conflicts with the actual permit requirements with respect to the O&M submittal due dates. Specifically, the second table states that the Emergency Plan must be completed and retained on site beginning at EDP+6 months whereas the actual permit requirements (Part IV.F.1) states that O&M requirements shall be completed at EDP+12 months (and updated annually thereafter). Which is correct?

**Answer:** The O&M and Emergency Plan have been a requirement of the Master General CSO permit for many years and CSO permittees should already have these plans in place. The 2015 NJPDES CSO permit contains some new requirements for the O&M and Emergency Plan and a date of EDP + 12 months is included for those additions. Therefore, CSM Part IV of the permit is correct.