



State of New Jersey

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SHEILA OLIVER
Lt. Governor

October 2, 2019

Honorable Mark Sokolich
Borough of Fort Lee
309 Main Street
Fort Lee, NJ 07024

Re: Review of Development and Evaluation of Alternatives
Borough of Fort Lee, NJPDES Permit No. NJ0034517

Dear Mayor Sokolich:

Thank you for your submission dated June 2019 to the New Jersey Department of Environmental Protection (the Department or NJDEP) which contains the “Development and Evaluation of Alternatives Report” (hereafter “the report”) for the Borough of Fort Lee. This report was submitted in a timely manner and was prepared in response to Part IV.D.3.v of the above referenced NJPDES permit. The report is part of the development of the Long-Term Control Plan (LTCP) submittal requirements, of which the next deliverable is due on June 1, 2020.

The Borough of Fort Lee is part of the system that is served by the Bergen County Utilities Authority (BCUA) Little Ferry Sewage Treatment Plant (STP) (NJ0020028), as well as the other combined sewer municipalities within the BCUA sewer service area namely the City of Hackensack (NJ0034517) and the Village of Ridgefield Park (NJ0109118). This letter serves to provide a response to the Development and Evaluation of Alternatives report specific to the Borough of Fort Lee. However, as a reminder, the ‘Selection and Implementation of Alternatives’ report, which is due on June 1, 2020, must be submitted as a single, coordinated LTCP in accordance with the permittees’ compliance schedule extension letter of September 29, 2015 as acknowledged in the October 9, 2015 minor modification.

The overall objective of the Development and Evaluation of Alternatives Report is to develop and evaluate a range of CSO control alternatives that meet the requirements of the Federal CSO Control Policy Section II.C.4, N.J.A.C. 7:14A-11, Appendix C, and the USEPA Combined Sewer Overflows Guidance for Long-Term Control Plan (EPA 832-B-95-002). Such evaluation shall include a range of CSO control alternatives for eliminating, reducing, or treating CSO discharge events. This subject report builds on other previously submitted LTCP reports referenced in Part IV.D.3.b of the NJPDES permit, which includes the June 29, 2018 “Sewer System Characterization Report for the Borough of Fort Lee, New Jersey”; the January 18, 2019 “Public Participation Program Report for the Borough of Fort Lee.”; the June 27, 2018 “BCUA CSO Group Public Participation Process Report”; the June 30, 2018 “NJCSO Group Compliance Monitoring Program Report”; and the June 2018 “Identification of Sensitive Areas Report”.

As per Part IV.G.4.e.i – vii of the above referenced NJPDES permits, the Development and Evaluation of Alternatives for the LTCP shall include, but not be limited to, an evaluation of the following CSO control alternatives:

- i. Green infrastructure.
- ii. Increased storage capacity in the collection system.
- iii. Sewage Treatment Plant (STP) expansion and/or storage at the plant while maintaining compliance with all permit limits.
- iv. Inflow and Infiltration (I/I) reduction to meet the definition of non-excessive infiltration and non-excessive inflow as defined in N.J.A.C. 7:14A-1.2 in the entire collection system that conveys flows to the treatment works.
- v. Sewer separation.
- vi. Treatment of the CSO discharge.
- vii. CSO related bypass of the secondary treatment portion of the STP in accordance with N.J.A.C. 7:14A-11.12 Appendix C, II C.7.

A general overview of the information provided for the CSO control alternatives, as provided in response to Part IV.G.4.e, can be summarized below where the Department’s comments follow:

- Green infrastructure (GI) technologies are generally described in Section 4.2.5 (Green Infrastructure) where this section also includes a description of the ancillary environmental, social and economic benefits of GI to the community. However, GI is also described in Section 7.2.2 (Inflow Control) where it is stated that due to the limited infiltration capacity of runoff surface in Fort Lee, which is identified as rock, this alternative will have a relatively small impact. Therefore, Fort Lee stated in the report that they will evaluate all other CSO alternatives conservatively, without GI, with the assumption that any additional impact of GI, however minor, would be considered in the development of the final selected alternatives.

- Regarding **increased storage capacity in the collection system**, the report generally describes sewer system optimization in Section 4.4 (Sewer System Optimization) as including additional conveyance, regulator modifications, outfall consolidation/relocation, and real time control. However, none of these alternatives are expanded on within Section 7.2 (Preliminary Control Program Alternative) which is where more detailed information regarding how the other specific control program evaluations applicable to Fort Lee are provided.

Various **storage** methods are described in Section 4.5 (Storage) including linear storage (pipelines, tunnels) and point source storage (tanks, industrial discharge detention). Section 7.2.4 (Satellite Storage) describes a conceptual evaluation of the storage tank option where it is stated on page 59 that “It is assumed that a storage tank would be located near the existing outfall and it would be below the ground.” It is then further stated that “[The] Storage tank alternative is considered as a primary solution for the CSO frequency control because it is able to reach frequency control target without combining with other control alternatives.”

- **STP Expansion and CSO Related Bypass** is discussed in Section 4.6 (STP Expansion or Storage at the Plant) in a general manner; however, none of these alternatives are expanded on within Section 7.2 (Preliminary Control Program Alternative) which is where more detailed information regarding how the other specific control program evaluations applicable to Fort Lee are provided.

- **Inflow and infiltration (I/I) reduction** is described in Section 4.3 (Infiltration and Inflow Control). While it is acknowledged in this section that an effective I/I control program can save money by extending the life of the system, reduce the need for expansion, lower treatment costs, and increase capacity, it is concluded on page 28 that significant I/I reductions can be difficult and expensive to achieve.
- **Sewer separation** is described in Section 4.7.3 (Combined Sewer Separation) as well as in Section 7.2.3 (Sewer System Separation). While Section 7.2.3 states that full sewer separation is a cost prohibitive alternative, there is some discussion of a smaller sewer separation project to help attain 85% capture.
- **Treatment of the CSO discharge** is generally described in Section 4.8 (Treatment of CSO Discharge) with a more detailed discussion in Section 7.2.5 (Treatment-Disinfection). Disinfection by Peracetic acid (PAA) is also identified in Section 7.3.3 (Selection of Preliminary Alternatives) as a preliminary solution.

Specific Comments

Comment 1

The section entitled, “Issue and Revision Record” includes the text

“This document is issued for the party which commissioned it and for specific purposes connected with the above captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.”

This comment needs to be deleted since the document is now an open public record.

Comment 2

Page 1 of the Executive Summary, includes the following statement:

“The Borough of Fort Lee comprises approximately 1,600 acres which is serviced by combined and separately sewered areas. The combined sewer system consists of approximately 640 acres discharging to three pump stations and two CSO outfalls.”

Similar information is included as well in Sections 1.1 (Sewage System Description) and 1.2 (Service Area Land Use Data). The Department made a comment in the Sewer System Characterization technical comment letter dated August 9, 2019 requesting Fort Lee to verify conflicting information regarding the separated versus combined sewer acreage, which included the values referenced above. Fort Lee’s recent response letter of September 16, 2019 provided clarification that 866.1 acres are served by separate sewers

and that 639.1 acres are served by combined sewers. Please correct the information in this report accordingly for completeness.

In addition, please explain the discrepancy regarding the size of the pipe where a 10-inch line is referenced on page 3 and a 12-inch line is referenced in the Executive Summary.

Comment 3

The heading for Section 1.2 is entitled “Service Area Land Use Data” yet the map within this section depicts separate and combined sewer areas of Fort Lee. Please replace or supplement this section with a map that shows land use types.

Comment 4

In Section 2.2 (Approximated Future Conditions) there is discussion regarding the two redevelopment projects. Please confirm that Section 2.2.1 (Projections of Population Growth) incorporates this redevelopment in the population growth estimates.

Comment 5

A discussion of public participation and the CSO Supplemental Team is included in Section 2.1 (Public Participation Process). As per Part IV.G.2 of the NJPDES CSO permit, public participation shall actively involve the affected public throughout each of the three steps of the LTCP process including the Development and Evaluation of Alternatives phase. The Department acknowledges that a listing of meetings and agendas for the CSO Supplemental Team, as well as a discussion of other public outreach, is included in either the “BCUA CSO Group Public Participation Process Report” dated June 27, 2018, or in the “Public Participation Program Report for the Borough of Fort Lee” dated January 18, 2019.

Please amend Section 2.1 of this subject report with a brief summary of public participation activities subsequent to the completion of these reports as well as meeting dates specific to the development and evaluation of alternatives. This supplemental information should include a general overview of feedback on any alternatives presented that are specific to the Borough of Fort Lee. Public participation is also discussed in Section 7.1.6 (Public Participation), however, references need to be revised within this section to indicate the Borough of Fort Lee.

Moving forward, public participation is a required element of the ‘Selection and Implementation of Alternatives’ for the LTCP. Continued public participation must be provided to garner public input regarding CSO control alternatives where a description of such activities must be included in the LTCP. The discussion should include a description of the public participation activities that occurred during the development of these reports, the feedback opportunities provided, and how feedback was considered. It is also recommended that members of the CSO Supplemental Team and the local Fort Lee community group be provided a copy of the LTCP in advance of the June 1, 2020 due date to the Department.

Comment 6

The NJPDES permit requires that the permittee(s) select either the Presumption or Demonstration Approach as defined in the Federal CSO Control Policy as well as in the NJPDES permit for the entire hydraulically connected system. These alternatives are briefly discussed in Section 3.2 (Range of CSO Goals Evaluated), where it is stated that the preliminary indication is that the Borough of Fort Lee will comply with 85 percent capture as identified as an alternative for the Presumption Approach. However, a specific approach has not

been selected within the report, nor has it been acknowledged that the approach will be applicable to the entire hydraulically connected system.

While this comment does not necessitate a response at this time, a final, coordinated selection is required to be made in the ‘Selection and Implementation of Alternatives’ report as part of the LTCP submission due from the BCUA CSO Group on June 1, 2020. Please also see **Comment 7** regarding establishing hydraulically connected systems.

Comment 7

Section 7.2.1 (Baseline) includes a summary of the Presumption Approach as included in the Federal CSO Control Policy, along with this excerpt on page 58:

“By this policy Fort Lee is almost in compliance with the 85% capture criteria. To attain the criteria and be in compliance with the policy Fort Lee will consider implementing some reasonable degree of additional CSO control...”

In order to evaluate percent capture under the Presumption Approach, the percent capture equation utilized to calculate any baseline and other percent capture values for each hydraulically connected system must be included for report completeness. As noted in **Comments 6** and **8**, a singular coordinated approach must be selected for the entire hydraulically connected system.

Please provide the equation that was utilized to derive the values in Table 7-1 (Baseline CSO Events and Volumes). In addition, the Department maintains that it is premature to include the above statement regarding compliance with 85% capture given the need for information referenced in this comment. A similar statement is also included in the Executive Summary which should be revised.

Comment 8

In Section 7.2.1 (Baseline) the report states on page 58:

“By this policy Fort Lee is almost in compliance with the 85% capture criteria. To attain the criteria and be in compliance with the policy Fort Lee will consider implementing some reasonable degree of additional CSO control...”

As referenced above this statement is inappropriate as Fort Lee is only one of the four BCUA CSO Group’s hydraulically connected permittees. The permit defines the term ‘hydraulically connected system’ within the Notes and Definitions in Part IV as “The entire collection system that conveys flows to one Sewage Treatment Plant (STP)...” The federal CSO Policy as well as the permit at Part IV.G.4.c. states, “The permittee shall select either Demonstration or Presumption Approach for each group of hydraulically connected CSOs, and identify each CSO group and its individual discharge locations.” As the BCUA CSO Group has not segmented the current system into smaller hydraulically connected systems, achieving 85% capture would have to be demonstrated for the entire BCUA CSO Group, not solely Fort Lee.

However, since the definition of hydraulically connected system allows the permittees to “segment a larger hydraulically connected system into a series of smaller inter-connected systems,” and if it is the BCUA CSO Group’s intention to define hydraulically connected systems that are smaller, segmented portions of the ‘entire collection system,’ a justification for the segmentation of those communities must be provided to and approved by the Department. Please clarify.

Comment 9

In Section 3.1 (Applicable Water Quality Standards), the following is stated on page 9 with respect to ambient water quality:

“The sampling program was not designed to provide an adequate data volume for assessing attainment of water quality standards, which would have required five samples per month at each sampling location to compute monthly geometric means. However, a review of the data collected can indicate the likelihood of attainment in the Hudson River in the vicinity of Fort Lee.

Figure 3-1 presents the data that was collected during the sampling program for the Hudson River at Fort Lee. This location is classified as a SE2 water body with a fecal coliform standard of 770 cfu/100 mL as a geometric mean... All samples collected in this program were in compliance with fecal coliform standard of 770 CFU/100 mL.”

Similarly, page ES-1 of the Executive Summary states:

“...The Hudson River is an SE2 water body in the vicinity of Fort Lee with a fecal coliform criteria (geometric mean) of 770 cfu/100 mL. Currently, sampling programs show the water quality to be in compliance with this criteria; therefore, water quality is not a driver for CSO control.

If Fort Lee is required to reduce CSOs further, the alternatives that they could use to reduce or eliminate CSOs are gray infrastructure alternatives such as disinfection, high rate filtration with disinfection and storage tanks.”

Regarding compliance with water quality standards, it would be premature and outside the scope of this report to draw any conclusions regarding compliance with water quality standards given that ambient water quality modeling results have not yet been submitted.

Comment 10

In Section 4.1.2 (Evaluation Methodology Used for This Study), on page 13, the report states that “If the technology is currently in place, will be implemented, or is mandated by the Nine Minimum Controls, then an evaluation is unnecessary.” However, the next paragraph seems to include Nine Minimum Control (NMC) technologies for further evaluation where the report states, “Potential CSO control technologies generally fall into the following broad categories: Source Controls: Green infrastructure; public and private infiltration and inflow (I/I) reduction and removal; sewer separation; and best management practices (BMPs)/Nine Minimum Controls, including floatables control.” And the report then proceeds to include some of the Nine Minimum Control technologies in the following summary.

The two statements, as well as information included further in the section, including in Tables 4-1 and 4-2 appear to be contradictory. Please also note that CSO control measures required to be implemented as one of the NMCs are not eligible to be counted in the LTCP. Compliance with the NMCs was required by July 1, 1996 and those control measures will not be able to be granted a later compliance date. Additionally, stormwater control measures that the Borough is required to be in compliance with as per the MS4 NJPDES permit are also not eligible to be incorporated into the Implementation schedule as compliance has already been required to have been met.

Further on this page, the report states, “A summary of technologies recommended for further investigation is provided in Section C.9 Screening of Control Technologies of this report.” However, there is no Section C.9 in this report. Please clarify.

Comment 11

Section 4.2.1.1 states “Street and parking lot storage can be accomplished by modifying catch basins to restrict the rate of stormwater runoff that enters the CSS. A portion of the stormwater runoff that would otherwise immediately enter the CSS is allowed to pond on streets or parking lots for a period of time before entering the CSS.”

It is not an acceptable CSO control alternative to allow combined sewage to back-up into streets or parking lots, potentially causing negative public health affects by exposing members of the public to be exposed to various pathogens and/or toxic chemicals in the sewage and allowing combined sewage to back-up to use streets and parking lots as storage would be a violation of the permit. As per F.1.j.i, the permit states,

“j. At a minimum, the SOPs shall contain detailed instructions for system operations, such as frequency of inspections, regular maintenance, and the timely repair, and documentation of such information, of the entire collection system that conveys flows to the treatment works. These SOPs shall include procedures for the following items:

i. Ensure that the entire collection system owned/operated by the permittee that conveys flows to the treatment works functions in such a way as to not result in sewage overflows (except from designated CSO outfalls) including to basements, streets and other public and private areas, or bottlenecks/constrictions that limit flow in specific areas and prevent the downstream STP treatment capacity from being fully utilized, in accordance with Section F.4. (emphasis added)

Please revise this statement.

Comment 12

Page 1 of the Executive Summary includes the following statement, “This report, Development and Evaluation of Alternatives Report, discusses all the alternatives available for CSO reduction and selects alternatives that could be used to reduce CSOs in Fort Lee.” Additionally, Section 4.3 (Infiltration and Inflow Control), Section 4.5.1 (Linear Storage) and Section 4.6 (STP Expansion or Storage at the Plant) address certain CSO control alternatives in a general sense, namely increased storage capacity in the collection system, STP expansion and/or storage at the plant, I/I reduction and wet weather blending, respectively. However, there is no specific discussion in the report as it relates to the Borough of Fort Lee within this section or later in the report in Section 7.2 (Preliminary Control Program Alternative). The Department does not agree that all alternatives were evaluated specific to Fort Lee as noted in the comments herein. Please provide additional site-specific discussion in Section 7 (Alternatives Evaluation) to provide a more complete coordinated evaluation of these alternatives.

Comment 13

In accordance with the Federal CSO Control Policy, the assessment of system-wide CSO control alternatives is required to be based on an “average” or “typical” rainfall year. As stated within the May 2018 report entitled “Typical Hydrological Year Report”, 2004 was selected as the typical hydrological year. While a long term precipitation data set (i.e. greater than 30 years) was considered as part of this analysis, a more recent period was used in the ultimate selection of 2004 in order to consider local climate change. While use of the year 2004 does consider climate change, please be sure to consider resiliency requirements in the design of any infrastructure (e.g., storage and satellite treatment). Specifically, in accordance with the provisions of Executive Order 11988, the USEPA and the New Jersey Water Bank

require that funded infrastructure be located outside of floodplains or elevated above the 500-year flood elevation. Where such avoidance is not possible, the following hierarchy of protective measures has been established:

1. Elevation of critical infrastructure above the 500-year floodplain;
2. Flood-proofing of structures and critical infrastructure;
3. Flood-proofing of system components.

While this comment does not necessitate a response at this time, these protective measures should be a consideration in the LTCP.

Comment 14

In Section 7.1.7 (Performance), the report states:

“The EPA’s CSO Policy requires CSO permittees to evaluate a reasonable range of control alternatives to reduce or eliminate CSO discharges to ensure that water quality standards are met.”

However, the federal and state regulations, and the NJPDES permit states that:

“The permittee shall submit, as per Section D.3.b.v, the Evaluation of Alternatives Report that will enable the permittee, in consultation with the Department, the public, owners and/or operators of the entire collection system that conveys flows to the treatment works, to select the alternatives to ensure the CSO controls will meet the **water quality-based requirements of the CWA**, will be protective of the existing and designated uses in accordance with N.J.A.C. 7:9B, give the highest priority to controlling CSOs to sensitive areas, and address minimizing impacts from SIU discharges.” (emphasis added)

Please revise the language in the report to reflect that the CSO control alternatives will be evaluated to meet the “water quality-based requirements of the CWA.”

Comment 15

In Section 7.2.2 (Inflow Control) GI is described as a complementary CSO control technology. Two different control levels of GI were assessed, including the management of 1” of storm water runoff generated from 5% of impervious surface as well as the management of 1” of storm water runoff generated from 10% of impervious surface. Both scenarios are equated to the number of acres that would be needed to attain these percentages. However, GI is also described in Section 7.2.2 (Inflow Control) where it is stated that due to the limited infiltration capacity of runoff surface in Fort Lee, which is identified as rock, this alternative will have a relatively small impact. Therefore, Fort Lee stated in the report that they will evaluate all other CSO alternatives conservatively, without GI, with the assumption that any additional impact of GI, however minor, would be considered in the development of the final selected alternatives. Please clarify the intentions for GI for the Borough of Fort Lee.

Also, the Borough is advised to evaluate any potential GI projects in accordance with the January 2018 GI guidance document prepared by the Department for LTCPs, entitled, “Evaluating Green Infrastructure: A Combined Sewer Overflow Control Alternative For Long Term Control Plans” at https://www.nj.gov/dep/dwq/pdf/CSO_Guidance_Evaluating_Green_Infrastructure_A_CSO_Control_Alternative_for_LTCPs.pdf.

Please note the Department's GI guidance manual is not intended to be the sole resource for evaluating this alternative, nor is this document intended to provide detailed design guidance for GI as this guidance can be found in the New Jersey Stormwater Best Management Practices Manual (see http://www.njstormwater.org/bmp_manual2.htm) nor is intended to be an endorsement of any proprietary software or work product. This guidance provides case studies, links, and resources to assist a CSO permittee with including GI as part of its CSO Long Term Control Plan.

Comment 16

Section 7.2.4 (Satellite Storage) includes a conceptual evaluation of a storage tank at FL-001 and FL-002 including an analysis of 5 scenarios of CSO frequencies including 0, 2, 4, 8, 12 and 20 overflows a year. In addition, please provide additional information regarding available land, topography and pumping limitations near these outfall locations since the estimated tank sizes depicted in Table 7-3 (Storage Tank Size (MG) at Each Level of Control) range from 2.0 to 12.5 million gallons (MG) for FL-001 and 0.1 to 1.2 MG for FL-002. Given the statement on page 59 that any potential storage tanks would likely be below the ground, please explain whether any consideration has been given to any amenities such as parks, parking lots or GI.

In addition, it is stated on page 59 that the stored CSO volume would be pumped back to the BCUA interceptor for treatment. Please see **Comment 16** below.

Comment 17

There is limited discussion within the report regarding the required evaluation of the alternatives concerning STP Expansion and CSO-related bypass. The Department acknowledges that the Borough does not own/operate the BCUA treatment plant; however, coordination between the three combined sewer municipalities and BCUA is essential in order to properly determine what would be needed to increase flow to the STP, as well as the STP expansion alternatives, including CSO-related bypass. This information must be clearly understood by all members of the BCUA CSO group in order for all of the CSO control alternatives to be accurately evaluated in terms of need and sizing.

As such, specific information regarding the additional flow that will be able to be conveyed to BCUA from all three municipalities, both during and after the wet weather events, is needed. For example, please identify the current average and peak conveyance capacity of the interceptor as well as if there is adequate conveyance capacity to divert any additional CSO flow to BCUA. In addition to identifying the current wet weather conveyance capacity of the interceptor, please provide a summary of what will be needed to increase the conveyance capacity to divert additional CSO flow from the Borough to BCUA. Accordingly, documentation regarding coordination of this information among the members of the BCUA CSO Group.

Comment 18

In Section 7.2.5 (Treatment - Disinfection) the use of disinfection by Peracetic Acid (PAA) is described where it is stated that:

“Where full treatment is achieved, disinfection is assumed to remove 99.9% of pathogens (a “3-log kill.”). This preliminary disinfection alternative assumes that PAA disinfection will be implemented at locations between the existing regulators and the existing outfalls.”

Please provide justification and clarify what is meant by 3-log reduction and how it relates to effective effluent disinfection. In addition, please provide information regarding available contact time and chemical dosing that would be needed.

In addition, it also appears that there will be no pretreatment technology to provide primary clarification and reduce solids as the report contains the following statement:

“It is possible that suspended solids removal may be required before disinfection is applied. Fort Lee’s CSO’s are very dilute with TSS ranging from 20 to 80 mg/L, so the added value of filtration may be investigated by bench and pilot testing. We have made cost estimates for disinfection and high rate suspended solids removal (FlexFilter). If we can meet the treatment objective without filtration then Fort Lee will use the lower cost treatment process of PAA disinfection alone.”

Please be advised that the Federal CSO Control Policy requires treatment that includes primary clarification (or its equivalent), solids/floatables and disinfection. As a result, Fort Lee must evaluate pretreatment technology.

Comment 19

While cost analyses are provided within the report, particularly in Section 5 (Costing) and Section 7.3 (Preliminary Selection of Alternative), please note that the Department is not commenting on any cost analysis at this time and will defer its comments until the coordinated LTCP submission. This includes any conclusions regarding the selection of any preliminary CSO control alternatives, present value calculations, and the cost range of any CSO control alternatives, as these cost estimates will be revised based on the revisions to the sizing of the alternatives chosen in the Selection and Implementation of Alternatives Report due June 1, 2020.

Comment 20

Table 7-11 (PV Cost Range for CSO Control Alternatives) includes different alternatives for various CSO Event Target/year. The Alternative IDs for each of the CSO Event Targets include 1) tank storage, GI of 5% of impervious surface and 2) PAA disinfection, FlexFilter, GI of 5% of impervious surface. Prior to this reference within this table there is only a general discussion of FlexFilter in Section 4.8.1.8 (High Rate Physical Treatment (FlexFilter)). Please clarify the Borough of Fort Lee’s intention regarding primary clarification and reducing solids prior to disinfection. In addition, please verify that the implementation of GI of 5% of impervious surface is a viable alternative given previous statements that GI is infeasible for the Borough of Fort Lee.

Comment 21

In Section 7.2.5 (Treatment - Disinfection) on page 60 the following is stated, “Pathogens represent the primary pollutant of concern for CSO discharges. While the Department agrees that pathogens are intended to serve as an indicator parameter for CSOs, please note that the CSO Control Policy requires controls adequate to meet the water quality based requirements of the Clean Water Act. While this comment does not necessitate a response at this time, the Department hereby notes this information for the Administrative Record.

Comment 22

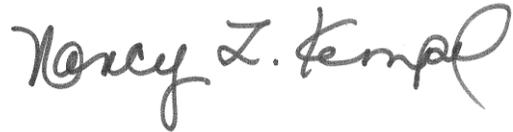
Section 7.7.7 (Inflow Control) includes Table 7-2 (Overflow Volumes and Frequencies with GI Alternative) which contains information regarding the CSO volume and frequency for Outfall FL-001 for GI alternatives for 5% and 10% control. Please provide similar information for Outfall FL-002.

Comment 23

There are certain instances throughout the report where the PVSC sewer district is referenced. Please revise accordingly.

Please incorporate these changes to the report and submit a revised version to the Department no later than 60 days from the date of this letter. Thank you for your continued cooperation.

Sincerely,



Nancy L. Kempel
CSO Team Leader
Bureau of NonPoint Pollution Control

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