



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

MAY 31 2018

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7016 1370 0001 3673 6869

Toby Moore Jr., Chief Operator
Roosevelt Boro WTP
33 North Rochdale Ave.
P.O. Box 128
Roosevelt, NJ 08555



**RE: Roosevelt Boro WTP (NJ0022918)
Compliance Evaluation Inspection (CEI) conducted on May 7, 2018**

Dear Mr. Moore:

On May 7, 2018, the United States Environmental Protection Agency (EPA), Region 2, conducted a CEI at the Roosevelt Boro Wastewater Treatment Plant (WTP), located at 85 Pine Drive in Roosevelt, New Jersey.

Within **thirty (30) calendar days** of receipt of this letter, please respond to the EPA in writing with the actions you have taken or will take to address the **Potential Noncompliance Items** identified in the enclosed inspection report.

If you have any questions, please feel free to contact me at (212) 637-4268, or you may contact Ms. Katherine Mann of my staff at (212) 637-4226 or mann.katherine@epa.gov.

Sincerely yours,

Justine Modigliani, P.E., Chief
Compliance Section
Water Compliance Branch

Enclosure

cc: Kathleen Hart, Borough Clerk, Roosevelt Borough w/enclosure
Joe Trammell, Borough Council President / Head of Utilities, Roosevelt Borough w/enclosure
Rich Paull, Director, Division of Water and Land Use Enforcement, NJDEP w/enclosure
Larry Cyr, Environmental Engineer, Central Borough of Water Compliance and Enforcement, NJDEP w/enclosure (electronic)

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	I Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A --- State (Contractor)	Q --- Other Inspectors, Federal/EPA (Specify in Remarks columns)
B --- EPA (Contractor)	P --- Other Inspectors, State (Specify in Remarks columns)
E --- Corps of Engineers	R --- EPA Regional Inspector
J --- Joint EPA/State Inspectors—EPA Lead	S --- State Inspector
L --- Local Health Department (State)	T --- Joint State/EPA Inspectors—State lead
N --- NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 --- Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 --- Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 --- Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 --- Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 --- Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Roosevelt Boro Wastewater Treatment Plant	
Inspection Date: May 7, 2018	EPA Representative: Katherine Mann, Physical Scientist, USEPA Region 2, (212) 637-4226
Inspection Time: 9:30 AM – 3:45 PM	NJDEP Representative: Larry Cyr, Environmental Engineer, (609) 292-3010
Facility Representatives: Toby Moore Jr., Chief Operator, Roosevelt Boro WTP Joe Trammell, Boro Council President/Head of Utilities, Roosevelt Boro	
Site Information: Lat / Long: 42.216806, -74.488558 Roosevelt Boro WTP 85 Pine Drive Roosevelt, NJ 08555 NJPDES No. NJ0022918 SIC Code: 4952 - Sewerage Systems	

INTRODUCTION:

On May 7, 2018, the United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) conducted a Compliance Evaluation Inspection (CEI) at the Roosevelt Boro Wastewater Treatment Plant (WTP) located at 85 Pine Drive in Roosevelt, New Jersey (the "Facility"). The objective of the CEI was to determine the Facility's compliance with its New Jersey Pollutant Discharge Elimination System (NJPDES) permit NJ0022918 (the "Permit") for discharges into Assunpink Creek. The current version of the Permit became effective on 2/1/2014 and will expire on 1/31/2019. Weather at the time of the CEI was sunny and approximately 72°F. EPA and NJDEP inspectors were met by Mr. Joe Trammell and performed a Facility walk-through with Mr. Trammell. Later, EPA and NJDEP performed a walk-through and reviewed records with Mr. Toby Moore Jr., Chief Operator of the WTP.

The WTP treats flow from approximately 900 residents and has a permitted flow rate of 0.25 MGD. There are no significant industrial users that send flow to the WTP. The Facility consists of a Muffin Monster grinder, auger, bar screen, influent wet well, two (2) primary settling tanks, two (2) trickling filters, two (2) final settling tanks, chlorine contact tank, final effluent chamber and outfall. In addition, sludge is stored in an old Imhoff tank that was part of the original Facility installed in 1936. Sludge is sampled twice per month and hauled to the Passaic Valley Sewerage Commission (PVSC) WTP, where it is incinerated. Rags removed by the auger and raked from the bar screen are held temporarily in a trash can, then picked up from the Facility and disposed of as municipal solid waste.

According to Mr. Moore, he collects final effluent samples every first and second Thursday of each month, which are analyzed by Garden State Laboratories, Inc. Annual and semi-annual Waste Characterization Report (WCR) sampling, as well as quarterly toxicity testing, are performed by American Aquatic Testing, Inc. Mr. Moore monitors temperature, pH and chlorine onsite daily.

Following its inspection performed on 11/29/2017, NJDEP issued a Notice of Violations (NOV) to the Facility for a number of operation and maintenance (O&M) and reporting deficiencies. The Facility had addressed some but not all of the violations noted by the NJDEP at the time of the CEI.

According to Facility representatives, a new chief operator is set to start on June 1, and Mr. Moore will be retiring at the end of June 2018.

POTENTIAL NON-COMPLIANCE ITEMS:

1. Part I.A.1.c of the Permit and N.J.A.C. 7:14A-6.12(a) state that, “A permittee shall, at all times, maintain in good working order and operate the treatment works and facilities which are installed or used by the permittee to achieve compliance with the terms and conditions of the discharge permit.” The following operation and maintenance (O&M) concerns were identified at the time of the CEI:
 - a. Scum build-up was observed in the primary settling tank skimmer troughs, which were in need of cleaning.
 - b. The rubber squeegee on one of the primary settling tank skimmer arms was missing.
 - c. A couple of the nozzles on the trickling filters were clogged and in need of maintenance.
 - d. Solids build-up was observed behind the weir in the final effluent chamber (believed to be the result of Delta-floc coagulant added prior to chlorine disinfection).
 - e. Sodium aluminate tanks were in need of cleaning and/or replacement (per the Facility’s April 2018 response to the NJDEP’s NOV, the Facility will be replacing the tanks, sandblasting and zinc coating the tank stands, and replacing the rails and grating).

2. Part I.A.1.c of the Permit and N.J.A.C. 7:14A-6.12(c) require the Facility to comply with the following O&M manual requirements:
 - a. The O&M manual shall be made available for inspection upon request by an authorized representative of the Department.
 - b. An O&M manual shall describe, at a minimum, the following:
 - i. Operator and staff responsibilities;
 - ii. Staff guidance for emergency situations;
 - iii. Identification of NJPDES permit requirements and the obligation to meet these requirements;
 - iv. Operating procedures including a detailed description of each major treatment unit/process with relationship to related units, safe operating procedure for normal operation, including common operating problems, safe operating procedures for operating during emergency conditions, and any fail-safe features;
 - v. A program of regularly scheduled inspection and maintenance; and
 - vi. An emergency plan in accordance with N.J.A.C 7:14A-6.12(d).

At the time of the CEI, the Facility did not have an O&M manual available for review. NJDEP had an outline of maintenance activities that the Facility had previously prepared; however, the outline did not include all of the minimum requirements listed above. During the CEI, Mr. Moore stated that he was working on updating the outline and developing an O&M manual using the NJDEP’s O&M Assessment Guide for WTPs: <http://www.nj.gov/dep/dwq/pdf/o-n-m-assessment-guide-wwtp.pdf>.

3. Part III of the Permit requires the Facility to submit a monthly Discharge Monitoring Report (DMR) within 25 days after the end of every month beginning from the effective date of the Permit (EDP). Based on data retrievals from EPA’s ECHO database and NJDEP’s Data Miner database, the Facility has experienced numerous failures to timely and correctly submit its DMRs. For instance, in 2017, the Facility failed to submit entire DMRs on time for the months of April and July (sampling was performed, but DMRs were not submitted until November 2017). Incomplete DMRs were submitted in January, February, May, and

August. Data were incorrectly reported in April, August, September and November, resulting in false effluent limit exceedances. These and additional reporting deficiencies have been noted by NJDEP in its annual inspection reports (reviewed for 2015-2017) and were included in the above-mentioned NOV. In 2018, the Facility incorrectly reported sampling results for total nitrogen (January).

At the time of the CEI, the following laboratory data were available on site but had not yet been submitted by the Facility:

- December 2016 lab results for pH indicating no violation
- August and September 2017 lab results for total phosphorus indicating no violation
- January 2018 lab results for total nitrogen indicating no violation (submitted subsequent to the CEI)

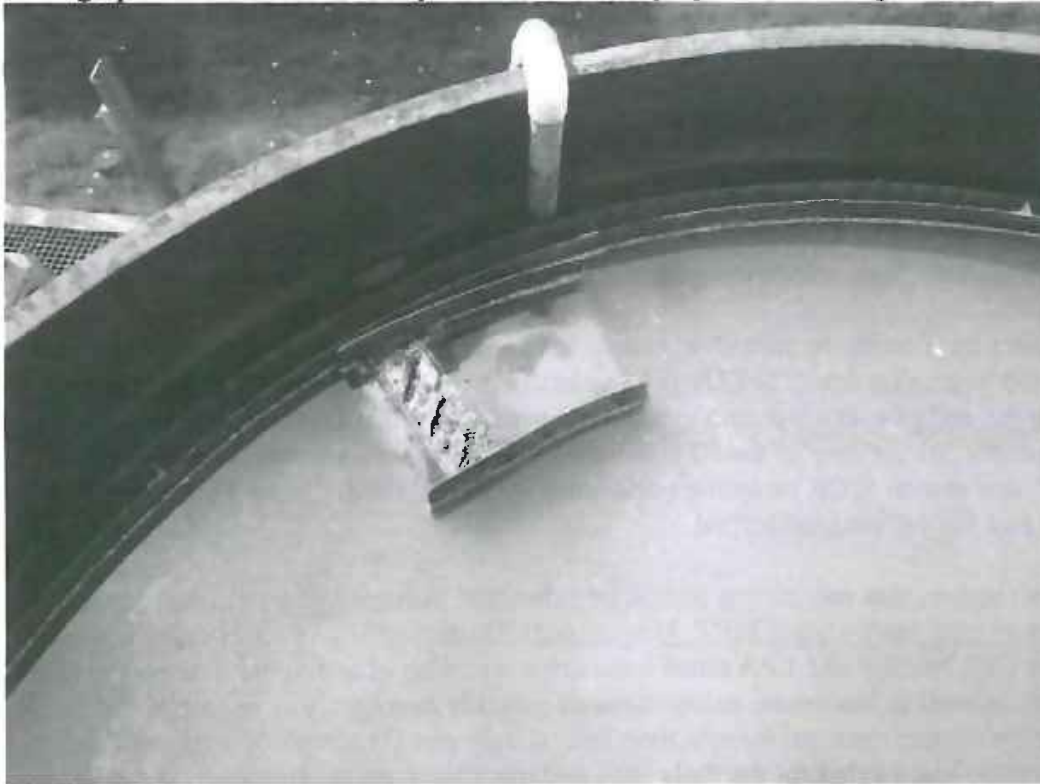
4. Part III of the Permit requires the Facility to submit an annual WCR within 25 days after the end of every 12-month monitoring period beginning from the EDP (i.e., annually, by February 26), and a semi-annual WCR within 25 days after the end of every 6-month monitoring period from the EDP (i.e., semi-annually, by February 26 and August 26). At the time of the CEI, laboratory data for semi-annual WCR sampling performed on 12/14/2017, and annual WCR sampling performed 1/29/2018 (both due by February 26, 2018), were available but had not yet been submitted.
5. Part IV.C.1.f of the Permit requires that monitoring results be submitted in accordance with the current DMR Manual (http://www.nj.gov/dep/dwq/pdf/MRF_Manual.pdf). During review of monitoring records available at the time of the CEI, NJDEP and EPA noted inaccurate reporting of analytical data on the DMRs (as noted in Item 3, above), as well as inaccurate calculations of monthly averages. For example, the Facility is only required to sample for copper once per month; therefore, if only one (1) sample is analyzed, the Facility should be reporting the same value for the daily max and monthly average. However, these values were different on DMRs reviewed during the CEI. It was unclear how Mr. Moore was calculating the value used for the monthly average field.
6. Part IV.D.2.a.iv of the Permit requires the Facility to submit a Compliance Schedule Progress Report for Copper within 48 months from the EDP, or by February 1, 2018. At the time of the CEI, the Facility had not yet submitted the Compliance Schedule Progress Report to the NJDEP and did not have a copy of the report available for review. Progress Reports submitted in 2015, 2016 and 2017 were available on site.
7. In accordance with Appendix B of the Permit, the Facility has Reclaimed Water Beneficial Reuse (RWBR) approval for sanitary sewer jetting and STP washdown. Part IV.E.13.d of the Permit requires the Facility to submit a Beneficial Reuse Annual Report by February 1 of each year beginning from the EDP. During the CEI, Mr. Moore produced letters stating that the Facility does not conduct any reuse activities, which were sent to the NJDEP via certified mail in Dec. 2015, Jan. 2016 and Dec. 2017. At the time of the CEI, the Facility had not submitted the annual report (or letter in lieu of the report) due February 1, 2018.
8. Part IV.F of the Permit required the Facility to conduct a Local Limits Evaluation, at a minimum to evaluate the need for local limits for copper, within 18 months of the effective date of the Permit, or by August 1, 2015. At the time of the CEI, a Local Limits Evaluation had not been performed. According to Mr. Moore, there are no significant industrial users that send flow to the Facility. Mr. Moore had a letter dated December 30, 2015 addressed to NJDEP that claimed non applicability of this Permit requirement, but it was unclear whether this letter had actually been transmitted to NJDEP. Mr. Moore stated that he would resend the letter.

ATTACHMENT:

1. Photographs

ATTACHMENT 1: PHOTOGRAPHS

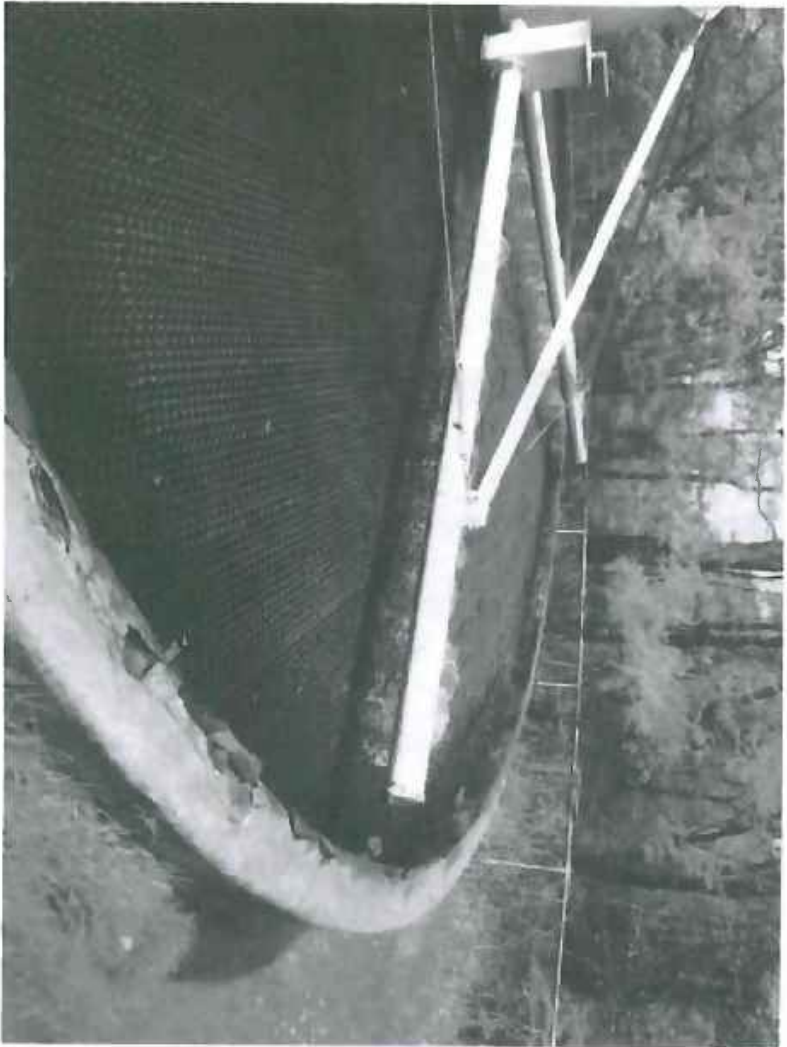
Photographs taken on 5/7/2018 by K. Mann with Olympus TG-830 digital camera.



P5070001.JPG – Scum trough in need of cleaning in first primary settling tank



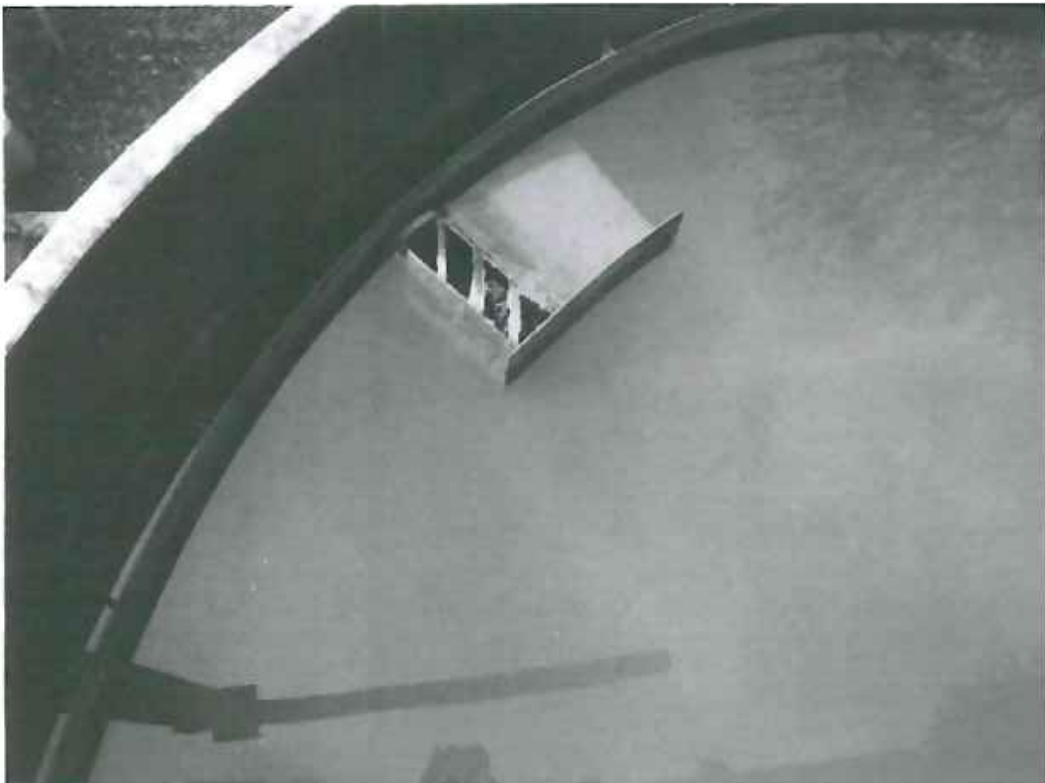
P5070004.JPG – Skimmer arm missing a rubber squeegee in the second primary settling tank. Scum build-up in trough (in need of cleaning) and solids build-up on ramp.



P5070006.JPG – Concrete deterioration on sides of trickling filter



P5070007.JPG – Trickling filter with clogged nozzle



P5070008.JPG – Scum trough in final clarifier



P5070012.JPG – Solids build-up behind weir in final effluent chamber



P5070013.JPG – Solids build-up behind weir in final effluent chamber



P5070014.JPG – Close up of solids build-up in final effluent chamber



P5070015.JPG – Final effluent and sampling location



P5070019.JPG – Chlorine contact tank