



File

State of New Jersey
Department of Environmental Protection and Energy
Office of the Commissioner
CN 402
Trenton, NJ 08625-0402
Tel. # 609-292-2885
Fax. # 609-984-3962

Scott A. Welner
Commissioner

**IN THE MATTER OF CERTAIN AMENDMENTS
TO THE ADOPTED AND APPROVED SOLID
WASTE MANAGEMENT PLAN OF THE
CAPE MAY COUNTY SOLID WASTE
MANAGEMENT DISTRICT**

**CERTIFICATION OF THE
JULY 28, 1992 AND SEPTEMBER 22, 1992
AMENDMENTS TO THE CAPE MAY 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.) established a comprehensive system for the management of solid waste in New Jersey. The Act designated all twenty-one (21) of the state's counties, and the Hackensack Meadowlands District, as Solid Waste Management Districts, and mandated that the Boards of Chosen Freeholders and the Hackensack Meadowlands Development Commission develop comprehensive plans for waste management in their respective districts. On February 4, 1981, the Department of Environmental Protection approved, with modifications, the Cape May County District Solid Waste Management Plan (County Plan).

The Act requires that all district plans be based on and accompanied by a report detailing the existing waste disposal situation in the district, and a plan which includes the strategy to be followed by the district in meeting the solid waste management needs of the district for a ten-year planning period. The report must detail the current and projected waste generation for the district, inventory and appraise all facilities in the district, and analyze the waste collection and transportation systems which serve the district. The disposal strategy must include the maximum practicable use of resource recovery techniques. In addition to this strategy, the plan must designate sufficient available suitable sites for the disposal of the district's waste for a ten-year period, which sites may be in the district or, if none are available, in another district. (The Act provides procedures for reaching any necessary interdistrict agreements.)

The Act further provides that a district may review its plan at any time and, if found inadequate, a new plan must be adopted. The Cape May County Board of Chosen Freeholders (County Freeholders) completed such a review and on July 28, 1992 and September 22, 1992, adopted amendments to its approved County Plan.

The amendment of July 28, 1992 proposed to include within the County Plan certain recommendations to the municipalities to establish uniform procedures for tracking the disposal of construction and demolition (C&D) and land clearing debris. Various recommendations to the municipalities to establish the tracking system provided for: increasing recycling of C&D and land clearing debris; educating residents and local code enforcement officials regarding proper recycling and/or disposal of the above waste types; establishing a program for regulating, tracking and ensuring proper recycling and/or disposal of the above waste types by incorporating such procedures into a local ordinance; and adopting uniform municipal ordinances to incorporate various provisions for tracking and conviction of the individuals involved in the illegal disposal of the above waste types. The amendment also recommends a model municipal ordinance. According to the amendment, it is not mandatory for the municipalities to consider these recommendations including the model municipal ordinance.

Further, the September 22, 1992 amendment proposed to delete from the County Plan the International Recycling Systems of Cape May, Inc. (IRSCM) recycling center which was to be located in the Burleigh Section of Middle Township, Cape May County.

The amendments were received by the Department of Environmental Protection and Energy (Department or DEPE) on September 2, 1992 and October 8, 1992, respectively, and copies were distributed to various administrative review agencies for review and comment, as required by law. The Department has reviewed these amendments, as well as the entire County Plan, and has determined that the July 28, 1992 amendment is approved in part and modified in part and the September 22, 1992 amendment is approved as provided in N.J.S.A. 13:1E-24.

B. Findings and Conclusions with Respect to the Cape May County District Solid Waste Management Plan Amendments

Pursuant to N.J.S.A. 13:1E-24a(1), I have studied and reviewed the July 28, 1992 and September 22, 1992 amendments to the County Plan according to the objectives, criteria, and standards developed in the Statewide Solid Waste Management Plan and I find and conclude that the approved parts of these plan amendments are consistent with the Statewide Solid Waste Management Plan.

In conjunction with the review of these amendments, the Department circulated copies to sixteen administrative review agencies and solicited their review and comment. Pursuant to N.J.S.A. 13:1E-24a(2) and (3), these agencies included various bureaus, divisions, and agencies within the Department. These agencies are the following:

Office of Energy, DEPE
Land Use Regulation Element, DEPE
Division of Parks and Forestry, DEPE
Division of Fish, Game and Wildlife, DEPE
Division of Solid Waste Management, DEPE
Green Acres Program, DEPE
Groundwater Quality Management Element, DEPE
Wastewater Facilities Regulation Element, DEPE
New Jersey Advisory Council on Solid Waste Management
Department of Agriculture
Department of Health
Department of Transportation
Department of Community Affairs
Department of the Public Advocate
U.S. Environmental Protection Agency
Pinelands Commission

1. Agency Participation in the Review of the July 28, 1992 Amendment

The following agencies did not object to the proposed plan amendment:

Division of Parks and Forestry, DEPE
Green Acres Program, DEPE
Wastewater Facilities Regulation Element, DEPE
New Jersey Advisory Council on Solid Waste Management
Department of Agriculture
Department of Transportation

The following agencies did not respond to the Department's requests for comments:

Land Use Regulation Element, DEPE
Division of Fish, Game and Wildlife, DEPE
Groundwater Quality Management Element, DEPE
Department of Health
Department of Community Affairs
Department of the Public Advocate
U.S. Environmental Protection Agency

The following agencies submitted substantive comments which are further addressed below:

Office of Energy, DEPE
Pinelands Commission
Division of Solid Waste Management, DEPE

2. Agency Participation in the Review of the September 22, 1992 Amendment

The following agencies did not object to the proposed plan amendment:

Office of Energy, DEPE
Land Use Regulation Element, DEPE

Division of Parks and Forestry, DEPE
Division of Fish, Game and Wildlife, DEPE
Green Acres Program, DEPE
Department of Agriculture
Department of Transportation
Pinelands Commission

The following agencies did not respond to the Department's requests for comments:

Groundwater Quality Management Element, DEPE
Wastewater Facilities Regulation Element, DEPE
New Jersey Advisory Council on Solid Waste Management
Department of Health
Department of Community Affairs
Department of the Public Advocate
U.S. Environmental Protection Agency

The following agency submitted substantive comments concerning the September 22, 1992 amendment.

Division of Solid Waste Management, DEPE

3. Comments Received for the July 28, 1992 Amendment

Issue: Pinelands Commission Requirements

Pursuant to the requirements of the Pinelands Comprehensive Management Plan, solid waste disposal facilities for C&D and land clearing debris are not a permitted use in the Pinelands area. Also, transfer stations for these wastes are only permitted in certain Pinelands Management Areas. As noted in Section C. of the certification, Provision A. of recommendation #4 of the proposed amendment has been modified in part to include this requirement of the Commission. The Commission and the County are hereby notified of this modification by copy of this certification.

Further, the Pineland's Commission indicated that according to the Pineland's Comprehensive Management Plan Cape May County's Bulky Waste Sorting/Recycling Facility may only accept demolition and construction wastes and land clearing debris from Pinelands counties and municipalities. The Department does not concur with the Pineland's position since the Pinelands Comprehensive Management Plan does not prohibit recycling centers in the same way as it prohibits solid waste disposal facilities. In this regard, the Bulky Waste/Recycling Facility is presently accepting waste generated only from within Cape May County.

Issue: Regulatory Requirements

Recycling of C&D and land clearing debris shall be in conformance with the regulations at N.J.A.C. 7:26A et seq. Also, the disposal of the subject waste shall be in conformance with the approved County Plan as well as the interdistrict and intradistrict waste flow regulations at N.J.A.C. 7:26-6 et seq. The County is hereby notified of the regulatory requirements noted above by copy of this certification.

Issue: Statutory Authority for Enforcement of Waste Disposal Requirements

Those provisions of the proposed municipal ordinance pertaining to a requirement to dispose of the waste at the County designated and/or DEPE permitted areas are enforceable by the municipalities pursuant to N.J.S.A. 13:1E-9.3. Further, certain provisions of the proposed ordinance in the amendment include penalties and violations, as well as rewards for assistance in the prosecution of violators. While these provisions appear to be redundant with the provisions of the Solid Waste Management Act at N.J.S.A. 13:1E-9.2 and 9.3, they may serve to enhance enforcement efforts.

As noted in Section C. of the certification, the proposed municipal ordinance is approved to the extent that it is consistent with N.J.S.A. 13:1E-1 et seq. The County is hereby notified of this action by copy of the certification.

Issue: Recommended Municipal Ordinances

a. Provision D. of the proposed municipal ordinance stated that "Prior to completion of each local construction project that has received a building permit, the municipality's Construction Code Official shall refer the permittee to the municipality's Code Enforcement Official." This section should state that "Prior to issuance of a certificate of occupancy or certificate of approval by the construction Code Official...". Also, a section should be added that requires the Construction Code Official to provide the applicant with a list of NJDEPE approved recycling centers, as well as information on approved disposal options for solid waste materials, at the time that the construction or demolition permit is issued. This will encourage recycling, by making the permittee aware of available options for recycling prior to construction. As noted in Section C. of the certification, Provision D. of the Ordinance is modified to include the above mentioned requirements.

b. Provision F. of the Ordinance states that "each and every separate item, article or piece of material dumped may be deemed a separate and distinct offense by the designated enforcement officials, County Health Departments and/or municipal judge's discretion." Since it would be unreasonable to consider each piece of material dumped to be a separate offense (e.g. 200 bricks dumped = 200 offenses), this provision should indicate that materials collected from different locations/collection accounts, but included in the same load, may be deemed a separate and distinct offense at the discretion of the municipal judge. As noted in Section C. of the certification, Provision F. of the Ordinance is modified to include this requirement.

c. Provision G. of the Ordinance states that "The time period for cleanup of a site where wastes have been illegally disposed of shall be a minimum of thirty (30) days upon conviction in municipal court." To set a minimum of 30 days for site cleanup without a maximum limit is inappropriate and, therefore, this provision should state that a person convicted in municipal court of the illegal disposal of solid waste under this ordinance shall complete cleanup of the site where waste has been illegally disposed of no later than 30 days from the date of conviction. As noted in Section C. of the certification, Provision G. of the Ordinance is modified to include this requirement.

d. The amendment recommends that within six months of the approval and adoption of the proposed amendment by the County Freeholders, each municipality is requested to adopt various provisions into their existing and/or new ordinances concerning illegal disposal of solid waste. However, the amendment does not take into consideration the statutory requisites of review and certification of this amendment by the Department which may result in approval, rejection or modification of same. Also, no amendment can be implemented by the County pending the Department's approval. Therefore, as noted in Section C., this recommendation is modified to indicate that the period for adoption of the municipal ordinance is within six months of the date of the certification by the Department.

The County is notified of the above mentioned modifications by copy of this certification.

4. Comments Received for the September 22, 1992 Amendment

Issue: IRSCM Deficiencies

According to the Department's records, IRSCM was incorporated into the Cape May County plan through the October 18, 1989 Certification of Cape May County's February 28, 1989 and April 11, 1989 plan amendments. Prior to plan inclusion, IRSCM submitted an application to the DSWM on December 20, 1987. IRSCM was later issued notices of deficiency on January 3, 1988 and September 8, 1988. Following resolution of the deficiencies, the DSWM issued a conditional approval to IRSCM which was later rescinded on June 14, 1989 since the company had failed to provide the required financial assurances. A second conditional approval was issued on November 21, 1989 in response to a request from IRSCM to sell the facility to new owners who could provide the financial assurances. However, due to IRSCM's inability to meet the requirements of the conditional approval, they were notified on March 22, 1991 that their file was deactivated. Also, IRSCM notified the DSWM on January 14, 1992 that there were still delays in negotiating the sale of the facility. Finally, during 1992 IRSCM received two notices of violation from the DSWM for operating without a solid waste facility permit and IRSCM has not removed previously deposited materials from the site in spite of requested requests from the DSWM. Therefore, as noted in Section C., the certification approves the County's plan amendment to delete the IRSCM facility from the County plan.

C. Certification of the Cape May County District Solid Waste Management Plan Amendments

In accordance with N.J.S.A. 13:1E-1 et seq., specifically N.J.S.A. 13:1E-21, which establishes specific requirements regarding the contents of the district solid waste management plans, I have reviewed the July 28, 1992 and September 22, 1992 amendments to the approved County Plan and certify to the County Freeholders that the July 28, 1992 amendment is approved in part and modified in part and the September 22, 1992 amendment is approved as further specified below.

1. July 28, 1992 Amendment

The inclusion within the County Plan of the four proposed recommendations to the municipalities to establish uniform procedures for tracking the disposal of C&D waste and land clearing debris is approved in part and modified in part as specified below.

Recommendation #1 which provides for recycling of the subject materials to the maximum extent possible is approved. The amendment indicates that the County has the capacity to recycle these materials by virtue of existing operating recycling facilities namely Daley's Pit recycling center in Upper Township, Future Mining and Recycling, Inc. in Middle Township, and the County's Bulky Waste Sorting/Recycling Facility located at the landfill site in Woodbine Boro.

Recommendation #2 which provides that the municipalities should educate the residents and local code enforcement officials regarding proper recycling and/or proper disposal of C&D and land clearing debris is approved. An education program is recommended to focus on two general topics, namely: (1) the scope of solid waste in the County, and the contribution of the C&D and land clearing debris to the waste stream and illegal disposal, and (2) the role of the building code enforcement officials in maximizing recycling and ensuring proper disposal methods.

Recommendation #3 which provides for establishing a program for regulating, tracking, and ensuring proper recycling and/or disposal of the C&D and land clearing debris by incorporating such procedures into a local municipal ordinance is approved. However, the recommended tracking procedure is modified as further specified below in Provision D. of Recommendation #4.

Recommendation #4 which provides for adoption of uniform municipal ordinances to incorporate provisions A. thru J. described below, for tracking of C&D and land clearing debris and conviction of the individuals involved in the illegal disposal of C&D and land clearing debris is approved, except as modified below. As noted in Section B., since the amendment cannot be implemented pending the Department's approval, the introductory part of Recommendation #4 is modified to state that each municipality should adopt such an ordinance within six months of the date of the Department's approved certification of the July 28, 1992 amendment to the Cape May County District Solid Waste Management Plan.

Further, as mentioned in Section B. the following recommended provisions to be incorporated into municipal ordinances are approved as modified below to the extent they are consistent with the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq., specifically N.J.S.A. 13:1E-9.2, 9.3, and 9.4.

Provision A. of recommendation #4, indicates that "the use or maintenance of any waste disposal area within the confines of the respective municipality other than those areas, if any, officially established by the DEPE permit or officially designated by the County, shall constitute a detriment to the public health and the environment." This provision is modified to reflect the fact that under the requirements of the Pinelands Comprehensive Management Plan, solid waste disposal facilities for C&D wastes and land clearing debris are not a permitted use in the Pinelands Area. Further, transfer stations for these wastes are only permitted in certain Pinelands Management Areas. Also, recycling and disposal of C&D and land clearing debris shall be in conformance with the approved County Plan, waste flow regulations at N.J.A.C. 7:26-6 et seq., and recycling regulations at N.J.A.C. 7:26A et seq.

Provision B. of recommendation #4 is approved and indicates that "no person, firm or corporation, whether acting as a contractor, agent, employee, collector or owner, shall dump, deposit or dispose of any garbage, animal matter, refuse, rubbish, debris, concrete, asphalt, tires, construction and demolition material, land clearing debris, salvage or waste material in or upon any lands within the confines of the respective municipality other than the designated and/or permitted areas. Nothing in this section shall be construed to hinder, impede or prevent the normal ordinary activities of a farm operation."

Provision C. of recommendation #4 is approved and provides that "any person assisting in the conviction of a violator of the subject ordinance through the signing of a complaint, the giving of testimony in court, or other significant assistance to the enforcement authorities thereof, or who testifies in court in an action against an alleged violator of the subject ordinance resulting in conviction, shall receive a reward of a minimum of two hundred fifty dollars (\$250.00). The respective municipality is authorized to adopt rules and regulations for the payment of such rewards and to determine criteria and standards of eligibility by resolution."

Provision D. of recommendation #4 requires that "prior to completion of each local construction project that has received a building permit, the municipality's Construction Code Official shall refer the permittee to the municipality's Code Enforcement Official. The permittee shall provide the Code Enforcement Official with receipts from an approved solid waste disposal and/or recycling facility for waste generated at the construction site in order to ensure that all such waste is properly and safely disposed of." As noted in Section B. of the Certification, this provision is modified to indicate that, prior to issuance of a certification of

occupancy or certification of approval, the municipality's Construction Code Officials shall refer the permittee to the municipality's Code Enforcement Official. Further, as noted in Section B. of the certification, the Construction Code official should provide the applicant with a list of NJDEPE approved recycling centers, as well as information concerning approved disposal facilities for solid waste at the time that the construction or demolition permit is issued.

Provision E. of recommendation #4 is approved and states that "this ordinance shall be enforced by the municipal code enforcement officials(s), law enforcement official(s), County Health Department, and/or any other person(s) designated by the respective municipality."

Provision F. of recommendation #4 is approved and provides that "any person, corporation or other entity who violates any provision of the subject ordinance shall, upon conviction, be subject to a fine not to exceed five hundred dollars (\$500.00) for each and every such violation, plus the cost of cleanup and proper and legal disposal of the waste material illegally disposed of; or community service for a term of not less than 20 hours nor more than 40 hours; or imprisonment for a term not to exceed 30 days; or any combination of these penalties."

Further, it provides that "a person who is convicted of a subsequent offense within one year of the date of the previous conviction may be sentenced to imprisonment for a term not to exceed 60 days; a fine not to exceed one thousand dollars (\$1,000.00); and community service, including litter pick-up, for a term not less than 40 hours nor more than 80 hours."

Further, it provides that "every day upon which a violation of the subject ordinance shall continue to exist, shall be deemed a separate and distinct offense. Additionally, each and every separate item, article or piece of material dumped may be deemed a separate and distinct offense by the designated enforcement official's, County Health Department's and/or municipal judge's discretion." As noted in Section B. of the certification, this provision is modified to indicate that materials collected from different locations/collection accounts, but included in the same load, may be deemed a separate and distinct-offense at the discretion of the municipal judge.

Provision G. of recommendation #4 requires that "the time period for cleanup of the site where wastes have been illegally disposed of shall be a minimum of thirty (30) days upon conviction in municipal court. The person, corporation or other entity who illegally disposed of the waste shall provide said receipts to the municipal code enforcement office to show that the waste was indeed disposed of in an environmentally sound manner. The site shall be deemed "cleaned up" by the municipal code enforcement office and/or the County Health Department." As noted in Section B. of the certification, this provision is modified to state that a person convicted of the illegal disposal of solid waste under this ordinance shall complete cleanup of the site where waste has been illegally disposed of no later than 30 days from the date of conviction.

Provision H. of recommendation #4 is approved and states that " if any section, subsection, paragraph, sentence or other part of the subject ordinance is adjudged unconstitutional or invalid, such judgement shall not affect, impair or invalidate the remainder of the subject ordinance, but shall be confined in its effects to the section, subsection, paragraph, sentence or other part of the ordinance directly involved in the controversy in which said judgement shall have been rendered and all other provisions of the ordinance shall remain in full force and effect."

Provision I. of recommendation #4 is approved and includes a repealer that "all other ordinances in conflict or inconsistent with the subject ordinance are repealed to the extent of such conflict or inconsistency."

Provision J. of recommendation #4 is approved and indicates that "the subject ordinance shall take effect immediately upon final adoption and publication required by law."

2. September 22, 1992 Amendment

The proposed deletion from the approved County Plan of the International Recycling Systems of Cape May, Inc. recycling center which was to be located in the Burleigh Section of Middle Township (Block 475, Lot 6), Cape May County is approved.

The County deleted this recycling center based on the premise that the Department deactivated IRSCM's recycling center application and file on March 22, 1991 due to the inability of IRSCM to meet all of the requirements of the recycling center approval process, which was established pursuant to N.J.S.A. 13:1E-99.34b, in a timely manner. Also, discussion with the County indicated that there are sufficient existing recycling centers as well as proposed sites in the District to handle concrete, asphalt and tree stumps. Further, as noted in Section B., IRSCM was incorporated into the Cape May County plan through the October 18, 1989 Certification of Cape May County's February 28, 1989 and April 11, 1989 plan amendments. Prior to plan inclusion, IRSCM submitted an application to the DSWM on December 20, 1987. IRSCM was later issued notices of deficiency on January 3, 1988 and September 8, 1988. Following resolution of the deficiencies, the DSWM issued a conditional approval to IRSCM which was later rescinded on June 14, 1989 since the company had failed to provide the required financial assurances. A second conditional approval was issued on November 21, 1989 in response to a request from IRSCM to sell the facility to new owners who could provide the financial assurances. However, due to IRSCM's inability to meet the requirements of the conditional approval, they were notified on March 12, 1991 that their file was deactivated. Also, IRSCM notified the DSWM on January 14, 1992 that there were still delays in negotiating the sale of the facility. Finally, during 1992 IRSCM received two notices of violation from the DSWM for operating without a solid waste facility permit and IRSCM has not removed previously deposited materials from the site in spite of requested requests from the DSWM.

Therefore, due to the lack of need for the IRSCM facility and its inability to meet Departmental permitting requirements, the County's action to delete this facility from the County Plan is appropriate.

D. Other Provisions Affecting the Plan Amendments

1. Contracts

Any contract renewal or new contract for solid waste collection or disposal which is inconsistent with these amendments to the County Plan and which was executed prior to the approval of these amendments and subsequent to the effective date of the Solid Waste Management Act (July 29, 1977), and which shall further be for a term in excess of one year, shall immediately be renegotiated in order to bring same 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 these amendments and of the County Plan if such renegotiation is not completed within ninety (90) days of the effective date of these amendments 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

All solid waste facility operators and transporters registered with the Department and operating within the County and affected by the amendments contained herein shall operate in compliance with these amendments and all other approved provisions of the County Plan. Any facility operator or transporter who fails to comply with the provisions contained herein shall be deemed to be in violation of N.J.S.A. 13:1E-1 et seq., in violation of N.J.A.C. 7:26-1 et seq., and in violation of their registration to operate a solid waste facility or a collection system issued thereunder by the Department and shall be subject to the provisions and penalties of N.J.S.A. 13:1E-9 and 12 and all other applicable laws.

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

The provisions of the County Plan 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 not apply to liquid wastes, sewage sludge, septage, and hazardous wastes. All nonhazardous 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 set forth at N.J.A.C. 7:26-6, but are subject to regulation in accordance with N.J.A.C. 7:26A-1 et seq.

4. Certification to Proceed with the Implementation of the Plan Amendments

This document shall serve as the certification of the Commissioner of the Department to the County Freeholders and pursuant to N.J.S.A. 13:1E-24c and f, the County shall proceed with the implementation of the approved amendments certified herein.

5. Definitions

For the purpose of these amendments 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 -99.12, N.J.A.C. 7:26-1.4 and -2.13, and N.J.A.C. 7:26A-1.3.

6. Effective Date of the Amendments

The amendments to the County Plan 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 County Plan, including any amendment made thereto, shall conform with the Statewide Solid Waste Management Plan. The Department has published a Statewide Solid Waste Management Plan, with appendices, which includes the Department's planning guidelines, rules, regulations, orders of the Department, interdistrict and intradistrict waste flow rules, and also includes the compilation of individual district plans and amendments as they are approved.

E. Certification of Approval In Part and Modification In Part of the Amendments by the Commissioner of the Department of Environmental Protection and Energy

In accordance with the requirements of N.J.S.A. 13:1E-1 et seq., I hereby approve in part and modify in part the amendments, as outlined in Section C. of this certification to the Cape May County District Solid Waste Management Plan which were adopted by the Cape May County Board of Chosen Freeholders on July 28, 1992 and September 22, 1992.

1-25-93
DATE


SCOTT A. WEINER
COMMISSIONER
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AND ENERGY

#1847