

(Plan 8-21-79)
3-6-80



STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF THE COMMISSIONER
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(IN THE MATTER OF THE PROPOSED)
(SOLID WASTE MANAGEMENT PLAN)
(OF THE CAMDEN COUNTY SOLID)
(WASTE MANAGEMENT DISTRICT)

CERTIFICATION
OF
MODIFICATION

BY ORDER OF THE COMMISSIONER:

On August 21, 1979, the Camden County Board of Chosen Freeholders adopted the Camden County Solid Waste Management Plan pursuant to the Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.).

The Department of Environmental Protection has studied and reviewed the Plan in accordance with this Legislation. The review process, established by the Solid Waste Administration in an April, 1979 Policy Memorandum entitled "Policy and Procedures for Review of District Solid Waste Management Plans," was used to evaluate the Camden Solid Waste Management Plan. This process was designed to incorporate both State level and public comments into the review. Generally, State agencies evaluated the Plan with regard to its impact on the State solid waste management program and their own programs, and provided advice within their own specialized areas of expertise. Public comments centered mostly on environmental concerns and the possibilities of implementing resource recovery. Additionally, the State has reviewed the Plan to ascertain whether there is sufficient clarity of facts and recommendations to permit program implementation.

Based on the results of this review and evaluation, it is my determination that the Camden County Solid Waste Management Plan be granted a Certification of Modification at this time, requiring satisfactory completion of the modifications listed herein.

The Department, as a result of its review of the Camden County District Solid Waste Management Plan, and in accordance with the Solid Waste Management Act, has made the following findings and conclusions:

- 1) The Solid Waste Management Act requires each District to include an analysis of existing solid waste collection systems and transportation routes within the Solid Waste Management District and further, to make a survey of proposed collection districts and transportation routes, and to project the transportation costs from collection districts to existing and designated solid waste facilities. While the Camden County Solid Waste Management Plan includes a survey of various types of collection systems, existing collector haulers servicing the area, estimated costs incurred by municipalities, and locations of existing disposal facilities used by municipalities, the Plan does not include a complete description of the services provided to each municipality, or a complete analysis of existing or proposed transportation routes and costs within the District to existing or available suitable sites for solid waste facilities.

- 2) The Solid Waste Management Act requires the District Plan to inventory the sources, composition and quantity of solid waste generation. While the Plan basically addresses this requirement, it does not provide sufficiently accurate data necessary for resource recovery implementation.
- 3) The Solid Waste Management Act requires the District Plan to include a solid waste disposal strategy which includes the maximum practicable use of resource recovery. While the Camden County Plan does indicate that the construction of a resource recovery facility is the "heart of the management plan," and the County's resource recovery study will be completed in July, 1980, a detailed implementation schedule is not included.
- 4) The Solid Waste Management Act and the guidelines and criteria adopted by the Department pursuant to the Act require the District to adopt a solid waste management strategy which includes the maximum practicable use of resource recovery, including source separation and recycling. While the Camden County Plan provides information on existing municipal recycling programs, and indicates that a source separation pilot program will be undertaken in 1981, the Plan, as submitted, lacks a comprehensive program to maximize source separation, including the identification of markets and costs, the consideration of regional source separation districts and any legal, institutional or financial measures necessary to implement the program.
- 5) The Solid Waste Management Act provides that a system shall be established for uniform disposal rates within the District. The Camden County Plan does not include a detailed procedure for the uniform distribution of resource recovery and disposal costs throughout the District's service area.
- 6) The Department, in its review of District Solid Waste Management Plans, finds that certain District Plans have not identified sufficient existing or available suitable sites to treat or dispose of their own wastes either in the short or long term, or both. Districts, including Camden County, have not entered interdistrict agreements with one another for the transportation of wastes across District boundaries. The Department finds that such interdistrict waste flow is necessary, particularly during the short term as resource recovery is implemented, and should be part of a comprehensive plan for solid waste management in New Jersey.

In light of the need for this interdistrict waste flow it is necessary for Camden County to enter into interdistrict agreements with neighboring Districts for the utilization of short term disposal capacity.

Therefore, Camden County is hereby directed to make the following modifications to its adopted District Solid Waste Management Plan no later than July 1, 1980:

- 1) The Plan shall set forth sufficient data and discussion to identify the existing and proposed configuration of solid waste collection and disposal operations, such that a solid waste franchise system can be developed. Camden County's proposal for the creation of solid waste sub-districts (Section 6.3.5) shall be revised to show the existing and proposed flow of each type of solid waste, including resource recovery residues, for the ten year planning period from each municipality (source) to a specific processing and/or disposal facility (destination) either within Camden County or within another Solid Waste Management District.
- 2) The Implementation Plan Schedule and Milestone (Figure 6-1) shall be revised to include a schedule (including specific milestones) for the completion of indepth studies necessary for resource recovery implementation and an indication of who will undertake the studies, an estimate of their cost, and how the studies will be funded. The studies shall include, as a minimum, the following:
 - a) the means for securing agreements/contracts for markets for materials and energy (including those for source separation/recycling),
 - b) an assessment of available resource recovery technology (including co-disposal) and an evaluation of cost/benefits,
 - c) determination of specific facility site(s), including lot and block numbers,
 - d) collection of more reliable solid waste generation and composition data and justification for facility capacity,
 - e) identification of legal and institutional constraints and solutions thereto,
 - f) projections of both capital and operating costs and the method of financing them,
 - g) environmental assessment of technology and sites, and
 - h) determination of capacity needs and facilities for the disposal of resource recovery residuals, for emergency backup and for non-processable wastes.
- 3) The Plan shall include a more comprehensive and implementable program for extracting the maximum practicable amount of recoverable materials via recycling, waste exchanges, and similar source separation programs. The Plan shall also identify and analyze the local market situation for recyclables and on-going recycling programs within the County.
- 4) The Plan shall include a more detailed implementation procedure for the uniform distribution of resource recovery and disposal costs throughout the District's service area. This Plan shall include any costs necessary to upgrade existing disposal facilities to meet environmental regulations.

- 5) The Plan shall include an interdistrict agreement with Burlington and Gloucester Counties to provide for the disposal of Camden County wastes within Burlington and Gloucester Counties. The agreement, to be of no longer than five years duration with provision for a one year renewal, is to provide disposal capacity for Camden County until such time as Camden County implements its own resource recovery facility and landfill. The interdistrict agreement shall be in a form described in "Rules Concerning Interdistrict Flow of Solid Waste Between and Among Solid Waste Management Planning Districts in Northeastern New Jersey" (N.J.A.C. 7:26-1.11). The agreements shall be executed in a form making same binding upon the affected Districts and shall set forth the necessary procedures for coordinating and integrating collection, transportation, recovery and disposal services in the area and setting forth the specific responsibilities of each District for implementation of the Plan(s). The agreements negotiated pursuant to this section shall be included in the Camden County Plan. In addition, the County should only provide resource recovery and disposal capacity for out-of-state wastes which are covered by long term contract.
- 6) Camden County shall reach an agreement with Burlington and Gloucester Counties on the amounts and types of wastes generated within Camden County and transported to either existing and/or proposed facilities within Burlington and Gloucester Counties for each year addressed in the Plan. The agreed upon data shall be incorporated into Camden County's report and Plan.
- 7) In addition, Camden County is directed to complete the additional modifications to its Solid Waste Management Plan described in the document attached to this Certification as Appendix I by July 1, 1980.

Attached as Appendix II is a list of recommended modifications to be included in the District Solid Waste Management Plan as part of the two year review required pursuant to N.J.S.A. 13:1E-20.

In accordance with N.J.S.A. 13:1E-24, these required modifications shall be considered major modifications of the District Plan and the District is hereby directed to conduct an additional public hearing no later than 45 days from the date of this Certification.

Following submission and review of the adopted modifications, I shall, within 30 days of submittal, certify to the Board of Chosen Freeholders whether or not these modifications are acceptable and if the Plan is approved.

Further, it is noted that the Solid Waste Management Act, the Rules of the Department of Environmental Protection, and other State and federal requirements apply to the permitting and approval of solid waste facilities. Therefore, neither the Certification nor any future action of the Department concerning the District Solid Waste Management Plan shall be construed to be in derogation of, or inconsistent with, such other requirements.

March 6, 1980
Date

Jerry Wilson, Dep. Comm. in The
Absent of *Jerry Fitzgerald English*
Commissioner

Appendix I

Additional Modifications Required by July 1, 1980

I. SOLID WASTE GENERATION

- The Plan shall include an inventory by source, type, composition, and quantity of solid waste (including sludge and septage) generated within the solid waste management District in the year in which the report is prepared and each of the ten years following the report. In addition, the Plan shall include a specific timetable for the conduct of a program to more accurately define waste generation rates and composition necessary for resource recovery implementation.

II. COLLECTION AND HAUL

- While the Plan included an excellent analysis on the implementation of transfer stations to increase the efficiency of transportation of waste within the District, all of the final disposal sites used in the analysis were out-of-county sites with the exception of a Camden County/City resource recovery facility. The analysis should be expanded to evaluate the alternative of utilizing a transfer station(s) to direct compacted wastes to the proposed in-county landfill.
- The Plan did not provide a specific analysis of industrial waste generation, transportation and disposal within the County. In addition, a strategy for the maximum recovery of industrial wastes should be developed. A specific timetable for undertaking this analysis and developing a strategy shall be included.
- The Plan shall include a strategy for increasing the efficiency of collection within the County, specifically a study evaluating the implementation of the COLMIS or similar collection improvement system.
- The Plan shall include a description of the services provided to each municipality including frequency of collection, point of collection, truck size, contract duration, transportation routes and services provided for the collection of bulky wastes, leaves and animal and food processing wastes.

III. SLUDGE AND SEPTAGE

- The Solid Waste Management Act requires each District to include a statement of the sludge disposal strategy to be applied in that District. While the Plan basically addresses this requirement, consideration should be given to the following:
 1. Now that the Greeley and Hanson sludge management study is completed, the results should be reviewed for consistency with the District Plan and incorporated into the Plan.

2. An assessment of treatment plan capacity for interim disposal of septage should, as indicated in the Plan, be undertaken immediately and the results utilized to develop an interim strategy for septage management.
3. The District should adopt guidelines for the review of 201 sludge management plans which are no less stringent than those which have been adopted by the Department.
4. An assessment of current sludge disposal practices should be prepared, addressing the following:
 - a. What landfills are currently accepting sludge from Camden County? Will these sites have the capacity to continue accepting sludge for an interim period?
 - b. Can the Camden facility accommodate any additional waste streams, either in the liquid or dewatered form?

IV. RESOURCE RECOVERY

- The Plan shall analyze and identify that part of the waste stream which will be recovered by high and low technology resource recovery, in order to minimize costs, conserve energy and enhance environmental quality.

V. PUBLIC PARTICIPATION

- The County shall provide for the continuation of its on-going comprehensive public information and participation program.

VI. LANDFILLS

- Camden County's proposal for the creation of solid waste sub-districts (Section 6.3.5) indicates that a county landfill is scheduled to be operational by 1981-82. The Plan shall include the necessary provisions for establishing this facility to provide for interim disposal capacity prior to resource recovery facility implementation and for the long term disposal of resource recovery residuals, emergency back-up and for non-processable wastes.
- The Plan shall contain an analysis of the necessary environmental improvements to landfills located within the District.

Appendix II

Recommended Modifications for Two-Year Update of the Camden County Solid Waste Management Plan

I. DATA BASE

- The Plan should include updated census data and utilize population projections consistent with year 2000 policy and projections from the New Jersey Department of Environmental Protection Draft New Jersey Water Quality Management Plan, March, 1979.
- Employment projections should be presented according to standard industrial classifications for total employment to provide consistency with other District data. Methodologies, assumptions and sources used in the formulation of estimates and projections should be included.
- The Plan should contain a section on existing major industrial and institutional developments and utilities. Proposed developments and constraints to development should also be included.
- The Plan should include a table showing existing land distribution (amount and percent) for single family residential, multi-family residential, commercial, industrial, public and quasi-public, conservation and recreation, and open space areas, updated beyond 1971 if possible.

II. SOLID WASTE GENERATION

- Solid waste estimates and projections should be provided according to waste identification categories in the New Jersey Department of Environmental Protection "Rules of the Solid Waste Administration." This format will provide consistency among District data.
- The updated Solid Waste Management Plan should include, in an appendix, the specific methodology used in obtaining solid waste estimates and projections.

III. COLLECTION AND HAUL

- The Plan should contain an analysis of the feasibility of alternative collection practices and should require the modifications of those practices where appropriate. This feasibility analysis should include an assessment of the feasibility of eliminating twice a week collection in those areas where recycling programs are successful.