29 Pocahontas Trail
Medford NJ 08055
May 2, 2003

Clean Water Council
Division of Watershed Management
NJ-DEP
401 East State Street
Trenton NJ 08625-0418

RE: Reclaimed Water Reply

Clean Water Council:

As Chair of the Public Education and Outreach Subcommittee for the Public Action Committee of the Rancocas Creek Watershed, a.k.a., WMA #19 this correspondence is in reply to your request for comments on Reclaimed Water for Beneficial Reuse (RWBR). The writer is complying with a sub-committee motion made and carried at our April meeting.

Personally, the writer has been an advocate of wastewater recycling for some twenty years. My interest started in the late 1970's while Chair of the Southwest Branch Rancocas Creek Drainage Basin Committee. The original goals then were to substitute reclaimed water in areas, where practical, when potable water was in use for purposes other than drinking. The areas included, but were not limited to, golf links, athletic fields and landscape irrigation. The objective in choosing these sites were two fold, one, to save the potable water supply and two, limit the amount of fertilizers required to maintain grass playing surfaces or healthy shrubbery. The programs of today seem to have moved away from the latter use. This then leads into my starting comment.

The starting comment is actually a two-part question. First, what is or are the goals of the State's RWBR program? Second, what are the objectives to achieve the goal(s). These questions are raised after attending a DEP update meeting Monday April 28, 2003. During Director Baier's presentation, RWBR questions were asked, but his answers did not include any plan or goals. When the plan is initiated people from each WMA must be brought into its making. This will provide the plan with a broad base and will improve its chances of being largely accepted.

Before this, Commissioner Campbell stated that he believed the state has over regulated wastewater treatment effluent, a point of agreement. With the effluent being chemically cleansed, no one knows for sure the long-term effects the by-product has on a receiving water body. The effluent may contain only "trace" amounts of the cleansing chemicals; however, over a period of time some chemicals and/or a replacement cycle of those chemicals would produce a certain level of residue in the receiving water body. Therefore, a long term Environmental Impact Study concerning the trace chemicals in the receiving water body should be required and be included in any RWBR program plan.

A large obstacle in any RWBR project is to have people replace a "free" water source with one that could be expensive. Therefore, more than a water source has to be available to RWBR users. As an example, of an incentive, regulations would allow some nutrients, conducive to grass and plant growth to remain in the effluent. This would allow the user to have an almost unlimited amount of irrigation water and to cut back on the use of granulated fertilizer. All in all this would also improve their bottom line, which should serve at least as one incentive.

The proceeding follows *The Division of Watershed Management Direction for 2003,* in the paragraph titled *Future Visions* and as presented at the April 28, 2003 meeting. This letter has only scratched surface of the problems and solutions facing RWBR projects. However, the points raised here are most important and must be addressed first before going to the next level. If they are not addressed it may prove to be a no win situation for all involved in RWBR planning projects.

Yours truly,

Richard McDonald

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