

# Waterfront South Action Plan for Compliance & Enforcement

Air C&E Program

Hazardous Waste C&E Program

Solid Waste C&E Program

Water C&E Program

# Air C&E Waterfront South Action Plan

- Consists of 6 Action Items
  - 1) Community Environmental Patrols
  - 2) Encourage Beneficial Environmental Projects in settlements
  - 3) Inspect major facilities and scrapyards in Waterfront South annually
  - 4) Timely response to odor complaints <30 minutes
  - 5) Amend CEHA Memorandum of understanding to include idling
  - 6) Odor procedure outreach

# Community Environmental Patrols

- Multimedia inspections with community leaders
- Upon request of community leaders, annually
- No requests made to date
- CCMUA site visit with Heart of Camden on October 6, 2006

# Beneficial Environmental Project

- Settlement with Oxy Vinyls in Pedricktown particulate related violations
- Includes fingerprint project to identify source of dust in Waterfront South
- Looking to do more as enforcement cases arise

# Inspect Major Air Facilities Annually

- GP Gypsum
- Camden County Energy Recovery  
Associates
- Camden Cogen

# GP Gypsum

- inspected 11/2/05
- violations (since 1/1/05 to 10/17/06)
  - recordkeeping (failure to record pressure drops)
  - exceeding fuel use limits
  - emission limit violations for NO<sub>x</sub> and TSP
- on-site inspection to be conducted by  
12/15/06

# Camden County Energy Recovery Associates

- inspected 8/5/05
- NOVs issued to address DEP approved affirmative defense claims
- violations (since 1/1/05-10/17/06)
  - CEM downtime
  - carbon monoxide exceedances
  - control device temperature excursion
  - submittal of emission statement
- on-site inspection to be conducted by  
11/30/06

# Camden Cogen

- inspected 8/9/05
- no violations (1/1/05 to 10/17/06)
- on-site inspection to be conducted by  
11/30/06



# Air Inspection of Scrap yards

- 6 Multimedia inspections performed
  - solid waste, hazardous waste, air, and water inspectors
- No Air (N.J.A.C 7:27) violations
- Two facilities found to be air regulated
  - Innovative Recovery Technologies
  - Camden Iron and Metal (Front and Atlantic)



# Solid Waste Scrap yard Inspection Results

- Five Facilities Inspected
  - Four junkyards
  - One Scrap Metal facility
- One Facility in violation
  - St. Hill Auto Parts junkyard
    - ~20,000 tires stored onsite in violation of N.J.A.C 2.8(f) – illegal solid waste facility.
    - Tires are being removed monthly and disposed at Camden Iron & Metal – cleanup completion in three years



# Hazardous Waste C & E Waterfront South Action Plan

- 1) 7 Multi-media inspections were conducted encompassing all scrap yards in Camden Waterfront South.
- 2) 4 mercury switch compliance assistance inspections at Scrap Yards in Camden Waterfront South.

# Hazardous Waste C & E Waterfront South Action Plan

- 3) 7 incidents were reported & investigations conducted as a result of citizen complaints.
- 4) 4 Notices of Violation were issued to the following companies as a result of these inspection & investigations.

# Hazardous Waste C&E

## Scrap yard Inspection Results

- a) Jersey Core for discharge of a hazardous substance “Used oil” and failure to label used oil container. Company came into compliance.
- b) St. Hills for discharge of a hazardous substance “used oil”, open used oil container, & failing to label used oil container. Company came into compliance.

# Hazardous Waste C&E

## Scrap yard Inspection Results

- c) R Fanelles Son's Scrap Iron & Metal:  
failure to label used oil container.  
Company came into compliance.
- d) Atlantic Coast Aluminum for discharge of  
a hazardous substance "Used oil" Company  
came into compliance.

# Water C&E Scrap Yard Inspection Results

- Multi-media “sweep” conducted May 23 & 24 at all scrap yards in Camden Waterfront South.
- Notice of Violation issued to Jersey Core; Administrative Order and \$45,000 Penalty issued on June 7, 2006.
- Jersey Core moved vehicle dismantling operation inside warehouse by November 1, 2006 to comply with its permit.



# Water C&E Scrap Yard Inspection Results

- Knockout Auto closed on January 1, 2006.
- St. Hill's Auto Parts re-opened October 1, 2006 and was inspected on October 18, 2006.
- Ongoing coordination with City of Camden to update the list of known and operating scrap yards.

# Water C&E Action Plan

## Auto-Flushers Operation

Sampling data following installation of auto-flushers shows they are effective for achieving Lead and Copper compliance if maintained and operating.

Reviewed inspection and maintenance logs from Camden BOE to assure that:

- timers are checked for 7 am operation
- batteries are replaced each 6 months
- fixture removed from service if flusher requires repair
- adequate logs are being kept

Referred to County Health Dept. for continued oversight.

# Water C&E Action Plan

## Camden Water Department

- Water C&E and BSDW met with Camden Water on March 2, 2006 and reviewed:
  - reporting requirements
  - sampling locations
  - sampling frequencies
  - parameters to be sampled
- Written guidance to Camden Water provided by DEP letter dated March 10, 2006.

# Water C&E Action Plan

## Camden Water Department

- Air strippers for Volatile Organic Compounds removal installed and operational at Morris/Delair treatment plant by October 1, 2006.
- April 20, 2006 Settlement Agreement with \$3000 Penalty issued for failure to notify DEP within 48 hours of TCE violation & failure to provide timely public notification.
- No recent citizen complaints received regarding Camden water quality.

# Water C&E Action Plan

## Camden County MUA

### New Sludge Drying System

- Installed to reduce the sludge quantity, improve the quality of the sludge product, and reduce odors related to sludge handling.
- System became operational on November 1, 2006 and is in startup phase.

# Waterfront South Odor Complaints

- May 11, 2004 to Nov. 13, 2006
  - 27 complaints received from residents of Waterfront South
    - 24 complaints alleging CCMUA
    - 2 complaints (1 dust/ 1 odor) alleging CCERA
    - 1 complaint Broadway Finishing

# 1 complaint verified (initiated by residents)

- Problems with investigations encountered
  - complainant not home at time of investigation
  - anonymous complaints
  - odors dissipated upon investigation

# Action Plan Requirements for Odor Investigations

- 30 Minute Response by DEP inspector
- Since November 29, 2005 meeting with residents and former Commissioner Campbell, complaints received during normal business hours investigated within 30 minutes



# DEP Odor Initiatives Beyond Action Workplan

- 24 Hour Surveillance Project
- Daily Odor Surveillance ( 2 times per day)

# 24 Hour Odor Project

- Involved State Park Police and Air SRO inspectors conducting odor surveillance 24 hours/ day for seven days in a Waterfront South route (2cd Street to I-76) covering all potential odorous sources
- occurred April 2 -8, 2006

## 24 Hour Odor Initiative (cont'd)

- 12 monitoring locations throughout WFS
  - Atlantic and 6th Street
  - Broadway and Webster
  - Viola and 6th
  - Chelton and Masters
  - Broadway and Morgan Blvd
  - King St and Essex(Gloucester City)
  - Jefferson and 4th
  - Ferry Avenue and 4th
  - Jackson St (CCMUA gate)
  - Atlantic and Ferry
  - Chestnut and Front
  - Spruce and 2nd St

## 24 Hour Odor Initiative (cont'd)

- Resulted in 2 verified odor incidents
- Investigations initiated by DEP inspectors not complainants
- Both orders issued to CCMUA which has requested hearings on both

# Daily Odor Initiative

- Commenced on 10/16/06
- Odor investigations conducted in morning and afternoon Monday through Friday
- Inspectors will issue enforcement actions without complaints from residents
- Once confirmed odor violation on 10/23/06

# Odor Procedure Outreach

- Odor Fact Sheets distributed at meetings between DEP and Waterfront South
- Procedures explained when Air inspectors make contact to investigate citizen complaints

# Conclusion

- C&E working diligently to address air, water and waste violations through inspections and review facility reports at all regulated facilities
- Timely response to odor complaints continue when reported to NJDEP Hotline or SRO Air office
- C&E initiated odor investigations ongoing
- C&E scrapyard cleanup ongoing