DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATERSHED MANAGEMENT

ADOPTED AMENDMENT TO THE NORTHEAST WATER QUALITY MANAGEMENT PLAN

Public Notice

Take notice that on October 20, 2004 pursuant to the provisions of the New Jersey Water Quality Planning Act, N.J.S.A. 58:11A-1 et seq., and the Statewide Water Quality Management Planning rules (N.J.A.C. 7:15-3.4), an amendment to the Northeast Water Quality Management Plan was adopted by the Department of Environmental Protection (Department). This amendment, submitted on behalf of EnCap Golf Holdings, LLC, allows the Meadowlands Golf Redevelopment Project in the Boroughs of North Arlington and Rutherford and the Township of Lyndhurst, in Bergen County to discharge leachate and wastewater to the Passaic Valley Sewerage Commissioners' wastewater treatment system. The complete project includes closure and remediation of the Rutherford, Lyndhurst, Avon and Kingsland Park Landfills, followed by golf course, commercial and residential development. Only portions of the overall redevelopment site were subject to this amendment as other areas are currently consistent with the areawide Water Quality Management Plan. The adopted amendment covers 463.5 acres located on Block 236, Lots 1.01 and 1.02, Lyndhurst; Block 219.01, Lots 74.02 and 74.04, and Block 220, Lots 1 through 12, 14, 15.01, 15.02, and 15.03, Rutherford Borough: and Block 192, Lot 4, Block 193, Lot 1, Block 194, Lot 1, Block 195, Lot 1, Block 197, Lot 1, and Block 198, Lots 1 through 3, North Arlington Borough.

Currently, the Rutherford Landfills, Kingsland Park Sanitary Landfill and the New Jersey Meadowlands Commission (NJMC) are within the Bergen County Utilities Authority (BCUA) sewer service area, while the Lyndhurst and Avon Landfills are within the Passaic Valley Sewerage Commissioners (PVSC) sewer service area.

The Kingsland Park Sanitary Landfill has an existing leachate removal system that conveys leachate flows to the BCUA. The Kingsland Park pumping station also conveys domestic wastewater flows from the NJMC Environmental Center in Lyndhurst to the BCUA. However, the BCUA cannot guarantee available treatment plant capacity for the additional flow quantities associated with this proposed redevelopment project. Therefore,

this amendment transfers the leachate and future development flows for the entire Meadowlands Golf Redevelopment Project, including flows associated with the Kingsland Park Sanitary Landfill and NJMC, to the Passaic Valley Sewerage Commissioners (PVSC) treatment plant in the City of Newark. The Rutherford and Kingsland Landfills and the NJMC Environmental Center are hereby removed from the BCUA sewer service area and added to the PVSC sewer service area.

The Rutherford Landfill North Node, Rutherford West and Rutherford East portion of the site will generate 230,295 gallons per day (gpd) of wastewater flow. The Rutherford North Node will contain a hotel, a restaurant, and two office buildings. The Rutherford West portion will contain 140 two bedroom residential units, 60 three bedroom residential units and two holes of golf. The Rutherford East portion will contain a golf maintenance facility and three holes of golf. The Kingsland Park Sanitary Landfill and the NJMC Environmental Center, which is located adjacent to the landfill, will generate an additional 150,945 gpd. The total amount of wastewater to be transferred to PVSC from BCUA for the EnCap site will total 381,240 gpd at maximum buildout.

This amendment was reviewed in accordance with Executive Order 109 (2000) and N.J.A.C. 7:15-5.18. It was determined that a Nonpoint Source Pollutant Loading Analysis, Riparian Corridor Analysis, Consumptive and Depletive Water Use Analysis and Endangered and Threatened Species Habitat Analysis were necessary.

Presently, the subject properties are occupied by several unlined and improperly closed landfills. These landfills currently generate hundreds of thousands of gallons of contaminated and untreated leachate per day that discharge into the surrounding surface waters. The Nonpoint Source Pollutant Loading Analysis determined that, in accordance with N.J.A.C. 7:8-5.4(a)2iii(1), groundwater recharge will not be required because the site consists of several former landfills which qualify as areas of high pollutant loading. Requiring groundwater recharge on this site would be inconsistent with the purposes of the landfill closure plan which seeks to reduce leachate generation and to collect and treat the leachate that is generated. Similarly, strict compliance with the requirements of N.J.A.C. 7:8-5 cannot be achieved because certain stormwater management activities, such as those that would pond water on top of the closed landfill, are generally discouraged by the Department. The applicant will implement Best Management

Practices (BMPs) on the residential, commercial and golf course portions on the site. The residential and commercial portions of the site will utilize Vortechniques Stormwater Treatment Systems to treat the stormwater from the site before it is discharged to Berry's Creek and the Hackensack River. The golf courses will be constructed in accordance with the Department's Draft Best Management Practices for Golf Course Construction and Operation in New Jersey Manual. The golf courses will include enhanced vegetation and vegetative filtration strips for nonpoint pollution control. The golf courses will also be required to submit an Integrated Pest Management Plan to the Department for review and approval prior to golf course operation. The closure of the North Node, Rutherford West, Rutherford East and Kingsland Park Sanitary Landfills, thereby reducing or eliminating the volume of contaminated leachate and the implementation of these BMPs on the EnCap site, will result in an overall decrease in nonpoint source pollutant loadings to Berry's Creek, the Hackensack River and their tributaries. Therefore, the Department concludes that the objectives of the Nonpoint Source Pollutant Loading Analysis have been met.

The Riparian Corridor Analysis determined that the 75-foot buffer was met throughout most of the site. The portions of the site that were not able to meet the 75 foot buffer requirement are areas already disturbed by previous activities associated with the landfills. The remaining buffers were increased to between 75 and 150 feet wide on other areas of the site to offset the portions of the site that could not meet the required 75-foot riparian buffers. Therefore, the Department concludes that the objectives of the Riparian Corridor Analysis have been met.

As part of the Depletive/Consumptive Water Use Analysis, the applicant originally estimated that 1 million gallons per day would be required for irrigation after the initial grow-in period, with 1.25 million gallons per day required for grow-in. The applicant now estimates under normal operation watering, approximately 600,000 gallons per day of irrigation water is necessary for the proposed golf courses with a maximum use of 1.20 – 1.25 million gallons per day for the grow-in period. Irrigation water is subject to nearly total loss through evapo-transpiration. Evapo-transpiration is a consumptive loss of water because that water is not returned to a surface water feature.

Three potential sources of water for the proposed golf course locations at the Kingsland Park Sanitary Landfill and Rutherford Landfills were identified by the applicant: reclaimed

wastewater for beneficial reuse, new on-site groundwater wells and potable water from a local water purveyor. The applicant has identified that the reclaimed water for beneficial reuse may come from the BCUA, PVSC or the Secaucus Municipal Utilities Authority. The applicant initially requested to use potable water purchased from local purveyors. Northeastern New Jersey's potable water supplies are largely reliant on surface water supplies. The region has experienced increased susceptibility to recurrent drought emergencies (1995, 1999 and 2002) due to increasing regional demands. When drought emergencies are declared, stream base flows may be compromised as less water is passed downstream from the region's reservoir system. As the State continues to promote smart growth within this region, greater demands will be placed on these surface water supplies. Therefore, it would be imprudent to squander this limited resource on non-essential, irrigation when viable alternative water supplies exist. Based on the analysis of water supply alternatives, the Department has concluded that the most suitable water supply options for the irrigation of the proposed golf courses are either the utilization of reclaimed water for beneficial reuse or new on-site wells. Because the golf course is situated in the estuarine portion of the watershed, use of these sources would not result in reduced base flow in streams or the lowering of the regional water table.

As a result of this analysis, the Department concludes that water from any potable water supply purveyor shall not be the primary long-term source of irrigation water for the project. However, the Department does recognize that the development of alternate water sources for golf course irrigation, be it on-site well or beneficial reuse, will take time to permit and develop. Additional information provided by the applicant during the comment period concerning certain contractual obligations between it and the New Jersey Meadowlands Commission (NJMC) reveals that an absolute prohibition on the use of potable water during this period could result in a default on those obligations. Therefore, upon a showing by EnCap that they have made all reasonable efforts to advance the development of alternative sources, but no alternative source can be fully developed in time to meet the schedule for golf course development as required by EnCap's developer's agreement with the NJMC, this amendment will allow the use of potable water as the primary source for irrigation for a limited period of time, not to exceed three years from the date of this amendment. This period may be extended only by a formal amendment to the Northeast Water Quality Management Plan upon demonstration by the applicant that alternative sources of water could not be developed within this time period. Thereafter, as a

contingency in the event that the on-site groundwater treatment system fails, or if the beneficial reuse supplier is unable to deliver water meeting the public access water quality requirements, EnCap will be allowed to utilize a total of 100,000 gallons per day (gpd) potable water supply for both golf courses associated with this amendment on an emergency basis only. The utilization of potable water for irrigation will only be allowed during periods when there are not drought conditions or any other related water restrictions. These limits will be reflected in any Water Main Extension Permit subsequently issued for this project.

Indoor water supply for the remainder of the uses proposed on this site, (e.g. hotel and conference center) will be accommodated through connection to an existing public water supply system. The source water for that system will be located in the non-tidal portion of the Hackensack / Passaic system. Beneficial reuse and groundwater supplies at this site are unacceptable for these "potable" uses. Wastewater generated from this development will be treated and discharged to tidal waters through the PVSC treatment works. Therefore, this water use is also depletive in nature. However, water supplied through an existing public water supply system will be provided under an existing allocation issued by the Department. That allocation includes passing flow requirements to address the impacts associated with this and other depletive uses of water. Consequently, the Department has determined there are no alternate sources of water for indoor water use and that the impacts associated with the potable water source are adequately addressed; therefore, the objectives of the depletive and consumptive water use analysis have been met.

As part of the United States Army Corp. of Engineers Individual Permit process the Endangered and Threatened Species Analysis was conducted in conjunction with the U.S. Fish and Wildlife Service and the Department's Land Use Regulation Program. The Northern Harrier (*Circus cyaneus*) and American Bittern (*Botaurus lentiginosus*) were both identified within the immediate project area, but no impact to either species is anticipated. EnCap will be restoring approximately 30 acres of impaired tidal wetlands as part of this development to enhance habitat for these species. All Endangered and Threatened Species issues were satisfied by this analysis.

This amendment proposal was noticed in the New Jersey Register on June 7, 2004, at 36 N.J.R. 2943(a). Comments on this amendment were received during the public comment period and are summarized below with the Department's responses. All comments that are addressed in this notice were submitted by the Sika Corporation of Lyndhurst, New Jersey.

1. **Comment**: EnCap estimates that between 1 million and 1.25 million gallons of water per day will be needed to irrigate the two golf courses included in Phase I of the Project. Eventually, once all phases of the Project are completed, EnCap will require upwards of 2 million gallons of water per day. Although the source of irrigation water for the project has not yet been determined, three possible sources of water exist: potable water, reclaimed grey water and ground water. Prior to any final decision being rendered with regard to the water sourcing issue, including but not limited to the issuance of any irrigation-supply related well permit(s) to EnCap, a public hearing should be held by the Department. In addition, the commenter requests that adequate notice of the hearing(s) be provided to its General Counsel and the Vice president of Operations.

Response: A public hearing was held on July 8, 2004 for the proposed amendment to the Water Quality Management Plan for the EnCap Golf Holdings, LLC project. This hearing was attended by the commenter whose representative asked questions and commented on the amendment. The Department and EnCap responded to all questions asked by the commenter at the public hearing and the Department is responding to all comments made in this notice of adoption. The Department has determined that a further public hearing on this amendment is not necessary. The Department does not believe that conducting an additional hearing on this amendment would be likely to result in the Department receiving comments relevant to the amendment that raise issues or provide new information, data or findings that were not previously raised or provided during the comment period. As indicated above, the applicant now estimates under normal operation watering, approximately 600,000 gallons per day of irrigation water is necessary for the proposed golf courses with a maximum use of 1.20 – 1.25 million gallons per day for the grow-in period. However, as part of any Water Allocation Permit a public hearing can be requested and held involving the Department, EnCap and all concerned parties.

2. **Comment:** The commenter draws ground water on its site in Lyndhurst pursuant to a valid Water Allocation Permit (Program Interest ID: 2049/Activity No. WAP 030001) for use in its operations. If EnCap is issued a Water Allocation Permit for all or part of its irrigation supply, EnCap's use of ground water may interfere or negatively impact the commenter's ability to draw ground water up to the maximum amount allowed under its permit. In accordance with the Water Supply Management Act, EnCap is required to evaluate the potential impact of any proposed new water supply source on existing water users. The proposed WQM amendment should not be adopted until the irrigation water source for the project has been determined.

3. **Comment:** Due to the substantial amount of water needed by EnCap on a daily basis; its use of ground water will lower the elevation of the potentiometric surface (head) in this area. Decreased head in the aquifer in this area would negatively effect the commenter's operations as well as other nearby businesses. An analysis must be conducted to determine if the local ground water elevation over the long term will be negatively impacted by EnCap's use of ground water prior to the issuance of any Water Allocation Permit.

Response to comments 2 and 3: As part of the EO 109 analysis, the Department conducts a Planning level review of the geology and depth of subsurface water features. Based upon this review, it is unlikely that these wells will have an effect on the stream base flows or any other surface water features. A more in-depth evaluation of potential impacts on groundwater and surface water features due to the groundwater wells will be performed during the water allocation permitting process. This analysis requires pump tests and hydro-geologic modeling to determine the zone of influence and the severity of impact of the proposed well(s). The adoption of this amendment does not in anyway commit the Department to issue an allocation for this project should an application be filed. The EO 109 analysis conducted by the Department as part of this amendment process is a planning level analysis designed to determine the best source of water for this development. This analysis cannot and is not intended to replace the Department's permit programs and the detailed analyses conducted as part of the Water Allocation Review. During that process, the Department will evaluate the likely effect of any groundwater withdrawal on Sika Chemical's and any other existing allocations. If, based on the water allocation review, the Department determines that the allocation of water to EnCap would

negatively effect Sika's existing allocation, then that allocation will be denied. The Water Allocation Review process includes notice and comment provisions that allow all interested parties to comment on the proposed withdrawal.

4. **Comment:** What factors will the Department consider when determining the best source of irrigation water for the Project? Are these factors given equal weight in the decision making process?

   Response: The Department considers factors such as: environmental impacts, including impacts on wetlands endangered species habitats and the potential migration of contaminants; watershed impacts, including interbasin transfer issues and stream base flow depletion; economic impacts, including the relative cost of alternative water sources; and human health concerns in determining the best source of water for a given project. The water allocation rules require that the lowest quality water suitable for the water supply need be used. As noted in the EO 109 consumptive depletive water use analysis, the Department has determined that the irrigation water for this project should utilize either on-site groundwater or beneficial reuse of wastewater to meet this objective. A preliminary cost analysis of these options has been performed and submitted as part of this amendment application. Based on that analysis, the Department concludes that both of these alternative sources of water are feasible. Therefore, based on the information provided thus far, the Department specifies no preference between these two potential sources. If however, as part of the water allocation review, the Department determines that the withdrawal of groundwater would negatively effect existing groundwater uses or result in other unacceptable environmental impacts, then the Department will require exhaustion of the beneficial reuse option before allowing finished water to be used for irrigation on the golf courses.

5. **Comment:** If EnCap is issued a Water Allocation Permit, will its use of ground water and the resulting effect on other ground-water users be monitored? How? Any Water Allocation Permit issued to EnCap should include limitations on the rate of potentiometric drawdown.

   Response: All Water Allocation Permits have monitoring and reporting requirements included as a condition of the allocation approval. As stated previously, pump tests and

hydro-geologic models will be used to predict the drawdown associated with EnCap's proposed withdrawal as part of the water allocation review process. If the information presented indicates a negative impact on other existing allocations and wells, or an unacceptable environmental impact, that allocation will not be issued by the Department. The allocation, if issued, will specify a maximum water usage that, based on the hydro-geologic modeling and the pump test information, will avoid adverse potentiometric drawdown effects.

6. **Comment:** The Brunswick Aquifer from which the commenter draws its water is highly susceptible to chloride contamination from adjacent salt-water bodies. The commenter is concerned that an increase in pumping by EnCap from the aquifer may result in an increase in the chloride concentration in the commenter's ground water and well water. Any increase in salinity (chloride and related hardness) will have a deleterious effect on the commenter's plant infrastructure and operations due to increased rates of corrosion of equipment. EnCap must be required to evaluate the distribution of chloride and other salinity related parameters in the ground water in the region, and to determine what the impact of any increased pumping would be on local chloride concentrations.

Response: The groundwater of the Brunswick Aquifer system contained in the Passaic Formation is not impacted by chlorides from saltwater intrusion in the vicinity of the project site and the commenter's Polito Avenue facility. The groundwater contained in the Passaic Formation is interpreted to be "discharging" in the area of Newark Bay and the New Jersey Meadowlands. Based on past investigations, there are wells in the vicinity of Newark Bay with elevated concentrations of chlorides that evidence saltwater intrusion from the bay, but this intrusion tends to be limited to the area around the City of Newark. The observed elevated chloride levels are believed to be attributable to improper well installation and construction techniques, over-pumping the aquifer and potential historic dredging operations of Newark Bay which breeched confining beds between the groundwater and surface water systems.

However, the Department recognizes salt-water intrusion is a legitimate concern, and will require this issue to be fully investigated by EnCap as part of its water allocation application. If there is an unacceptable risk of saltwater intrusion predicted by the model, the Department will not issue an allocation. Further, if an allocation is granted and there

is even a slight potential for saltwater intrusion, EnCap will be required by the Department to monitor chloride concentrations on a periodic basis as a condition of any approved water allocation permit. These requirements will be similar to those contained in the commenter's Water Allocation Permit No. 2049.

7. **Comment:** Because of the substantial daily use of water contemplated by EnCap, the commenter has concerns regarding water availability particularly during periods of drought. How will water be allocated during periods of limited supply? Will existing permit holders receive preference over EnCap? Will the fact of another permit holder create an additional limitation of the commenter's ability to draw water? What factors are considered to allocate the water under such circumstances?

   Response: During periods of drought, the State often restricts non-essential water use in accordance with the severity of the drought condition. Drought restrictions are not typically applied to individual water users, rather they are applied on a regional basis due to a regional condition. However, the effect of any drought declaration will depend on the water use restrictions imposed by that declaration. Differences may occur due to the nature of the water use. For example, an outdoor water use ban or an odd – even irrigation requirement might affect EnCap, but would not affect the commenter because its use is as non-contact process water. One advantage to EnCap of beneficially reusing wastewater is that it would not be subject to those limitations, since that wastewater is discharged to tidal waters and is not essential to stream base flow or downstream water supplies. If EnCap elects to use groundwater, then it will be subject to any drought restrictions put in place.

8. **Comment:** How does the Department intend to monitor EnCap's compliance with any Water Allocation Permit which may be issued? How does the Department intend to monitor the quality and quantity of ground water during the duration of any permit?

   Response: As with all water allocation permits, the Department requires permit compliance monitoring and reporting on a quarterly basis with inspections on an annual basis. All source water is required to be metered for flow and volume on a continuous basis. Flow meters are required to be calibrated every five years for accuracy.

9. **Comment:** If reclaimed water is used by EnCap, how will this use effect the quality of ground water below the project site? EnCap must be required to study the impact of reclaimed water use on the local ground water. This is a two part analysis: the first part is the impact caused by drawdown from nearby wells and the second part is analysis of whether the irrigation water recharges the aquifer or is all lost to the atmosphere and as off-site runoff.

Response: If reclaimed water is used for irrigation purposes, the water will need to be treated to meet Department criteria for direct public contact. These criteria are as stringent as the Department's Class II criteria for groundwater supply. Therefore, there should be no impact to the groundwater from the use of treated reclaimed water.

EnCap will be employing Best Management Practices (BMPs) for the operation and maintenance of the golf courses. Part of the BMP strategy is to apply the correct amount of irrigation water to promote a healthy disease-free turf with good "play" characteristics. Over-irrigation of the golf course could produce turf diseases and a course with poor playability (e.g. no "ball bounce or roll"). The Department considers irrigation of golf courses to be 90% consumptive with most of the water being "taken up" by the turf with evaporative loss to the atmosphere. The balance of irrigation water that infiltrates through the cover material will be intercepted by the drainage layer of the landfill cap system and diverted to stormwater management systems. The purpose of the cap, approved as part of the landfill closure, is to prevent water from infiltrating into the landfill thus generating more leachate. However, any irrigation water that migrates beyond the drainage layer will enter the landfill's approved leachate management system (LMS) where it will be removed from the site for off-site treatment. Given the extensive thickness of low permeability organic silts and glacial varved sequences approximately 120 to 180 feet thick between the landfill materials and the bedrock aquifer, there is no hydraulic communication between the water in the landfill and the bedrock. Therefore, groundwater contamination as a result of the landfill closure project or the redevelopment project is extremely unlikely.

10. **Comment:** Does the Department plan to require EnCap to determine the impact, if any, on ground water of pesticides, herbicides and fertilizer used in connection with the project?

Response: As noted above, EnCap will be employing BMPs for the golf course, which includes the proper handling, use and application of pesticides, herbicides and fertilizers. As mentioned above, the degree of separation between the land surface and the bedrock aquifer make potential contamination of groundwater unlikely.

11. **Comment:** What is the rate of recharge to the Brunswick Aquifer beneath the EnCap site and will limitations on the recharge rate negatively impact EnCap's possible use of ground water?

Response: As previously noted, the Passaic Formation is interpreted as discharging groundwater to the Meadowland Basin. The Brunswick Aquifer (groundwater contained in the Passaic Formation) receives recharge directly through infiltration of precipitation and through "leakage" from near surface unconsolidated aquifers, wetlands and surface water bodies in the headwaters area of the Passaic and Hackensack Basin. Most of the recharge to the Brunswick Aquifer occurs far up-gradient of the project site (to the west-northwest). Given that the EnCap site and the Meadowlands as a whole are separated from the Brunswick Aquifer by low permeability meadow mat, and 120-180 feet of silts and varved clays, little if any recharge to the aquifer comes from the EnCap site. Further evaluation would need to be performed to estimate the approximate recharge area and the amount of annual recharge from the EnCap site. However, if the recharge to the Passaic Formation from the EnCap site was significant, the water in the aquifer would be salty since the unconfined groundwater and surface water in the New Jersey Meadowlands is brackish. Therefore, the Department believes this level of analysis to be unnecessary.

12. **Comment:** How will water which percolates through the caps over the various landfills be contained to prevent it from enhancing contaminant migration into the local aquifer?

Response: EnCap is currently constructing a containment system around the landfills, which includes a vertical hydraulic barrier wall, leachate collection system and a cap system. Leachate will be contained within the barrier wall and will be pumped to the Passaic Valley Sewerage Commissioners treatment facility. This system will dramatically improve the quality of groundwater and surface water in the region.

If reclaimed water is used for irrigation purposes, the water will need to be treated to meet Department criteria for public direct contact. The public direct contact criteria is as stringent as the Department's Class II criteria for groundwater supply. Therefore there should be no impact to the groundwater from the use of treated reclaimed water.

EnCap will be employing Best Management Practices (BMPs) for the operation and maintenance of the golf courses. One of those BMPs is to apply the correct amount of irrigation water to promote a healthy disease-free turf. The Department considers irrigation of golf courses to be 90% consumptive with most of the water being "taken up" by the turf with evaporative loss to the atmosphere. The balance of irrigation water that infiltrates through the cover material will be intercepted by the drainage layer of the landfill cap system and diverted to stormwater management systems. Irrigation water that migrates beyond the drainage layer will enter the landfill's Department approved leachate management system (LMS) where it will be removed from the site for off site treatment. As mentioned above, the extensive thickness of low permeability organic silts and glacial varved sequences of approximately 120 to 180 feet thick between the landfill materials and the bedrock, there is no hydraulic communication between the water in the landfill and the bedrock.

13. **Comment:** If gray water is used for irrigation purposes, what pretreatment methods will be used?

Response: The pretreatment methods depend on the source of the water that is being used for the irrigation of the golf courses. All gray water that will be used for irrigation of the golf courses will be required to meet the criteria for public direct contact, as mentioned above, in accordance with the Department's Technical Manual for Reclaimed Water for Beneficial Reuse.

14. **Comment:** Which, if any, of the New Jersey Solid Waste Act Regulations (the "Regulations") would reservoirs for irrigation purposes located on the golf courses violate? How would reservoirs with impermeable liners conflict with the Regulations? What concerns does NJDEP have about the water run off from the irrigation and how is the run off to be handled?

Response: The portion of the project that contained the impermeable lined reservoir was outside the scope of this amendment. However, The Department will review the impermeable lined reservoir under the Remedial Action Work Closure Plan prepared in accordance with the Solid Waste rules.

This amendment represents only one part of the permit process and other issues may need to be addressed prior to final permit issuance. Additional issues which may need to be addressed may include, but are not limited to, the following: antidegradation; effluent limitations; water quality analysis; exact locations and designs of future treatment works (pump stations, interceptors, sewers, outfalls, wastewater treatment plants); and development in wetlands, flood prone areas, designated Wild and Scenic River areas, or other environmentally sensitive areas which are subject to regulation under Federal or State statutes or rules.

SIGNED

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Lawrence J. Baier, Director
Division of Watershed Management
Department of Environmental Protection

10/20/04

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Date