



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

VIA EMAIL TRANSMISSION: jstevenson@haddontwp.com

Jim Stevenson, Water/Sewer Superintendent
504 Oneida Avenue,
Haddon Township, New Jersey 08108

Re: **Sanitary Sewer System Compliance Evaluation Inspection
Haddon Township, Sanitary Sewer System
NJPDES Tracking ID No. NJP002586**

Dear Mr. Stevenson:

As part of a joint effort between the United States Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) to ensure that the discharge of sanitary sewer overflow is minimized, we conducted a Sanitary Sewer System (SSS) Compliance Evaluation Inspection (CEI) of your system on September 11, 2023. The principal purpose of the SSS CEI was to assess your system's adequacy in minimizing Sanitary Sewer Overflows (SSOs).

Based on information provided during the SSS CEI, Haddon Township had five (5) sanitary sewer overflows or spills in its collection system between 12/18/2018 and 2/5/2022.

During the CEI, EPA identified an **Area of Concern**. Within **thirty (30) calendar days** of receipt of this letter, please respond to the EPA in writing regarding the item listed under **Area of Concern** in the CEI report.


Please note that overall compliance of your collection system will continue to be reviewed by NJDEP and any questions or issues related to your compliance should be addressed directly to NJDEP. Any questions or information related to this inspection should be directed to EPA along with a copy to NJDEP.

I am enclosing a copy of our inspection findings for your files. If you have any questions concerning our inspection, please feel free to contact me at (212) 637-3950 or Ms. Zarine Ali at (212) 637-3919 or email Ms. Ali at ali.zarine@epa.gov.

Additionally, further guidance and information concerning the control of SSOs may be found by accessing the following EPA website: <https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos>.

Sincerely yours,

**LARRY
GAUGLER**

 Digitally signed by LARRY
GAUGLER
Date: 2023.11.14 07:09:05
-05'00'

Larry Gaugler, P.E., SCWCP Team Leader,
Water Compliance Branch

cc: Thomas Sweeney, Southern Bureau of Water Compliance & Enforcement, NJDEP,
thomas.sweeney@dep.nj.gov

Michael Baxter, Water Resource Management, Michael.Baxter@wrmops.com

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, Region 2
Enforcement and Compliance Assurance Division
Water Compliance Branch**

Clean Water Act (CWA) Inspection Report

Program: Sanitary Sewer System		Inspection Type: Compliance Evaluation Inspection	
Permittee Name: Haddon Township		NPDES/ICIS No.: NJP002586	
Inspection Entry Date: September 11, 2023 Inspection Entry Time: 9:10 AM		Inspection Exit Date: September 11, 2023 Inspection Exit Time: 2:50 PM	
Facility Inspected: Haddon Township 504 Oneida Avenue, Haddon Township, New Jersey 08108		Lat, Long: 39.91573, -75.04527 NAICS / SIC Code: NAICS Code: 221320 (Sewerage Treatment Facilities) SIC Code: 4952 (Sewerage Systems)	
EPA Representative(s): Zarine Ali, Physical Scientist, U.S. EPA Region 2, (212) 637-3919			
State Representative(s): None			
Representative(s): Jim Stevenson, Water/Sewer Superintendent, (856) 833-6260 Michael Baxter, Water Resource Management, (856) 444-0010			
Responsible Official: Jim Stevenson, Water/Sewer Superintendent, (856) 833-6260			
Name and Signature of Inspector		Agency/Office/Phone Number	Date
ZARINE ALI  Digitally signed by ZARINE ALI Date: 2023.11.13 11:23:51 -05'00' Zarine Ali, Physical Scientist		R2-ECAD-WCB/212-637-3919	
Name and Signature of Management QA Reviewer		Agency/Office/Phone Number	Date
LARRY GAUGLER  Digitally signed by LARRY GAUGLER Date: 2023.11.14 07:09:32 -05'00' Larry Gaugler, P.E., SCWCP Team Leader		R2-ECAD-WCB/212-637-3950	

I. Introduction:

On September 11, 2023, the United States Environmental Protection Agency (EPA) Region 2, conducted a Sanitary Sewer System (SSS) Compliance Evaluation Inspection (CEI), of Haddon Township, hereinafter designated "Township," sanitary sewer collection system. The purpose of this SSS CEI was to assess the adequacy of the system's minimization of the release of sanitary sewage. Mr. Jim Stevenson (Water/Sewer Superintendent) and Mr. Michael Baxter (Water Resource Management) represented the Township. Ms. Zarine Ali, of EPA presented

credentials to the Township's representatives upon arrival. An opening conference was conducted to explain the purpose of the CEI and how it would be conducted. Weather conditions at the time of the CEI was approximately 84° and sunny.

II. Inspection Findings:

1. The Township owns and maintains its sanitary sewer collection system. The collection system is a separate sanitary sewer system. According to the United States Census Bureau, in 2022, the Township's estimated population was 15,401.
2. There are no outside contributors to the Township's collection system. Flow from the Township goes to the Camden County Municipal Utilities Authority (CCMUA).
3. Approximately 225 homes from the Township goes into the Borough of Haddonfield's collection system.
4. The collection system has approximately 52 miles of piping, mostly installed between 1907 and 1925. The piping in the system range from 8" to 24" in diameter.
5. Approximately 80 to 85% of the collection system is composed of clay piping. The collection system has cast and ductile iron piping, polyvinyl chloride (PVC), and asbestos cement piping. The Township has 1,165 sanitary sewer manholes.
6. The collection system is mapped in AutoCAD.

Pump Stations:

7. The Township has the following six (6) pump stations: South Park Drive pump station, Park and Albertson pump station, Cuthbert Boulevard pump station, New York Avenue pump station, Lake Drive pump station, and Calvert Avenue pump station.
8. At the time of the CEI, the Township said that the New York Avenue pump station will be upgraded. The Township has the money for the upgrades. When the project starts it will be done in less than a year.
9. The pump stations have autodialer alarm systems and they are checked daily. All the big stations have bypass pumps.
10. The wet wells at the pump stations are cleaned quarterly or as needed.
11. The Township has written procedures for doing a bypass at all six (6) pump stations.

Flow Metering and Billing:

12. CCMUA bills residents within the Township directly. Residents are billed a flat rate on a quarterly basis.

SSO Discharges / Spills:

13. At the time of the CEI, the Township had five (5) SSOs between 12/18/2018 and 2/5/2022. The following lists describe these events:
 - 2/5/2022 – NJDEP received a complaint regarding raw sewage discharging into the Cooper River from an 8” diameter outfall pipe. CCMUA and Collingswood were first notified and they did not take responsibility for the discharge. NJDEP then notified the Township. On 2/15/2022, the Township went to the site as well as NJDEP. EPA visited the manhole at 225 South Park Drive where an SSO location once existed. The Township plugged and used hydraulic cement to seal the bypass pipe.
 - 6/17/2019 – SSO from a manhole at the intersection of Graisbury Avenue and Tomlinson Avenue. The overflow was caused by a main stoppage. No known waterways were impacted.
 - 1/24/2019 – There was a leak in the gravity main at the intersection of Newton Avenue and Route 130. The gravity main runs through a stormwater manhole. The Township made the repairs. The Newton Creek was impacted.
 - 12/30/2018 – SSO from a manhole at the intersection of Graisbury Avenue and Thomilson Avenue. The overflow was due to a blockage in the main. The sewage went into a storm drain which goes into the Newton Creek.
 - 12/18/2018 – A contractor for NJDEP broke a force main at Walnut Avenue and 3400 Black Horse Pike. Repairs were done on the same day. The Newton Creek was impacted.
14. On 9/10/2023 (the day before the CEI), the area received heavy rain. The Township said staff drove around and did not observe any evidence of an SSO. However, with the rain the area received the Township can’t imagine there not being any SSO. The Township did not receive any calls of an SSO.
15. The Township has written procedures for responding to overflows including main stoppages and overflows from Inflow/Infiltration (I/I).

Residential Complaints / Collection System Insurance:

16. The Township is responsible for the main. Residents are responsible from their home to the main.

17. Insurance for the collection system is covered through the Camden County Joint Insurance Fund. In the past five (5) years the Township did not receive any complaints from residents regarding sewage backups at private property.
18. The Township has residential calls, and calls received from pump stations dating back to 12/26/1999.
19. The Township sends residents an annual calendar and information on the water and sewer department is included with the number to call to report a water or sewer emergency. The back of the calendar has the Township's municipal directory with the numbers and emails for different departments.

Capacity Issues/Collection System Maintenance:

20. Approximately 20% of the collection system is cleaned annually. The Township does preventative maintenance as well as quarterly hot spot cleaning. There are a few locations in the system where a degreaser is added on a quarterly basis.
21. The Township has two (2) combo Jet/Vac Trucks for the maintenance of its system. For big projects the Township will use a contractor.
22. Televising is done as needed. The Township has a camera van which is in the process of being updated, and a small camera that can look at laterals.
23. When work on a street is being done, the Township replaces manhole rings and covers which helps reduce I/I in the collection system. During rain events the Township's pump stations are more active which is an indication to the Township that there is I/I in its system.
24. At the time of the CEI, work was being done on Haddon Avenue. This is a county owned road, but in the Township's collection system. The Township said manholes will be replaced and some pipe lining might be done as needed.
25. The Township has a licensed collection system operator, and this operator is required to carry out certain duties as specified in N.J.A.C. 7:10A-1.12.
 - According to N.J.A.C. 7:10A-1.12(a)(1), "Each licensed operator shall have readily available written detailed operations and maintenance (O&M) procedures. The O&M procedures shall be designed to maximize preventative maintenance and operating techniques that will ensure that the system operates in a manner that satisfies all laws, rules, regulations, license conditions and orders relating to [N.J.A.C. 7:10A]. The written O&M procedures shall be updated within 30 days after any substantial change to the system that warrants a change in the operation and maintenance of the system."

The Township provided a copy of its "Operations and Maintenance Manual and Emergency Response Plan (ERP) for Haddon Township Water Department Collection

Systems.” The document was prepared by WRM Water Resource Management and it was recently updated in September 2023.

III. Area of Concern:

1. On 2/5/2022 NJDEP receive a complaint regarding sanitary sewage discharging into the Cooper River from an 8” diameter outfall pipe. While investigating this incident NJDEP notified the Township. EPA visited the manhole at 225 South Park Drive where an SSO location once existed. The Township plugged and used hydraulic cement to seal the bypass pipe. The Township was unaware that an SSO location existed at this location. In the past there were additional bypass locations which the Township calls underdrains that existed in its collection system. The Township said the underdrains that it knew of were plugged or completely removed. As the Township televises its collection system as needed, does the Township plan to televise its entire collection system to determine if additional bypass locations exist in its system?

IV. Field Work

1. **The degreaser which the Township adds to its collection system (2 Photographs).**



2. **Manhole at Severino Restaurant on Haddon Avenue where the degreaser is added (1 Photograph).**



3. **Manhole on private property at 225 South Park Drive.**

The manhole is located in a backyard. This is the manhole that had the bypass piping (2 Photographs).



The piping for the bypass was plugged and the Township also used hydraulic cement.

Without the use of a flashlight the location where the bypass piping once existed is difficult to see (1 Photograph).



4. **Manhole at Tomlinson and Graisbury**

At the time of the CEI, sewage in the manhole was moving freely (2 Photographs).



V. **The Township provided the following information:**

1. A copy of its "Operations and Maintenance Manual and Emergency Response Plan (ERP) for Haddon Township Water Department Collection Systems."