



# NPDES Pretreatment Compliance Sampling Inspection Report

Trenton Renewable Power LLC  
1600 Lambertson Road  
Trenton, New Jersey

NJ0218791

September 12-13, 2023

**Report Prepared by:**

**ROBERT  
MORRELL**

Digitally signed by ROBERT  
MORRELL  
Date: 2023.10.31 13:57:38 -04'00'

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Robert Morrell, Geologist  
Monitoring Operations Section

Date: \_\_\_\_\_

**Report Approved by:**

**PHILIP COCUZZA**

Digitally signed by PHILIP  
COCUZZA  
Date: 2023.11.01 05:56:43 -04'00'

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Philip Cocuzza, Supervisor  
Monitoring Operations Section

Date: \_\_\_\_\_



## 1.0 OBJECTIVE

On September 12-13, 2023, at the request of the Water Compliance Branch, the United States Environmental Protection Agency (USEPA) conducted a National Pollutant Discharge Elimination System (NPDES) Pretreatment Compliance Sampling Inspection (CSI) at Trenton Renewable Power LLC in Trenton, New Jersey. The objective of the CSI was to gather information necessary to determine compliance with the general pretreatment requirements of 40 CFR Part 403 and the industrial user permit issued by the New Jersey Department of Environmental Protection (NJDEP).

## 2.0 KEY PARTICIPANTS

Listed below are key inspection participants and contact information, grouped by organization.

U.S. Environmental Protection Agency  
Robert Morrell, Geologist, Lead Inspector  
[Morrell.robert@epa.gov](mailto:Morrell.robert@epa.gov), 732-906-6804  
Thuan Tran, Physical Scientist  
[Tran.thuan@epa.gov](mailto:Tran.thuan@epa.gov), 732-321-4455

Trenton Renewable Power LLC  
Brian Blair, General Manager  
[wbrianblair@gmail.com](mailto:wbrianblair@gmail.com), 856-693-6540

## 3.0 FACILITY DESCRIPTION

### 3.1 General Information

Trenton Renewable Power is located at 1600 Lambertson Road in Trenton, New Jersey. The facility is a food waste recycling and renewable energy company that converts food waste into methane and compost. The plant operates 24 hours per day, 7 days per week. There are 19 employees that work three shifts. The plant was designed to accept 450 tons of food waste per day. Currently, the facility processes approximately 260 tons per day. There are three 1.1 megawatt generators that use the methane produced on site. Approximately 2 megawatts of carbon-negative energy are produced per day. A large source of the food waste is agricultural waste at ports that has been rejected due to improper temperatures. Other sources include food waste and expired package products from grocery stores and warehouses.

### 3.2 Process Information

Food waste is delivered by truck to the facility and is separated from packaging materials using shredders, grinders, and magnets. The food waste is conveyed to a 480,000-gallon buffer tank. Water is added to the tank from one of three sources: the effluent from the Trenton Sewer Utility Wastewater Treatment Plant (WWTP), the influent to the WWTP, or two process water tanks. After mixing, the food waste is pumped to one of three thermophilic anaerobic digesters. The heat exchangers maintain the temperature at 52°C inside the digesters. The retention time in the digesters is approximately 30 days. After digestion, the sludge is conveyed to two centrifuges, where the sludge is dewatered. The solids are collected in a roll off container for disposal at a local landfill. The decant liquid wastewater is conveyed to the ammonia stripper and then an oil-water separator. The wastewater is then discharged through Outfall DSN 001L to the Trenton Sewer Utility WWTP.

Methane gas from the digesters is collected in a storage tank for use as fuel for the generators. Solids are currently sent to a local landfill for disposal. The facility plans to market the solids as compost in the future.

### 3.3 Facility Self-Monitoring Information

Pretreatment wastewater samples are collected monthly in accordance with the industrial user permit issued by NJDEP. 24-hour composite samples are collected for the analysis of 5-day biochemical oxygen demand (BOD<sub>5</sub>), total suspended solids (TSS), total phosphorus, total ammonia, and metals. Grab samples are collected for pH, and oil and grease. Flow is monitored continuously.

## **4.0 EPA SAMPLING/INSPECTION ACTIVITIES**

### 4.1 Sampling Activities

On September 12, 2023, an automatic composite sampler was set up at the effluent chamber for Outfall DSN 001L. The sampler was programmed to collect an aliquot of the effluent wastewater every 15 minutes for 24 hours. After 24 hours, the automatic composite sampler was disassembled, and the composite sample jug was mixed thoroughly before filling the sample containers. The 24-hour composite sample was analyzed for BOD<sub>5</sub>, TSS, total phosphorus, total ammonia, and metals (arsenic, cadmium, chromium, copper, lead, nickel, zinc, and mercury). During the 24-hour sampling survey, a grab sample was also collected at Outfall DSN 001L for oil and grease. A grab sample for pH was collected and analyzed in the field. The 24-hour flow was recorded from the totalizer and provided by the facility representative.

All sample containers, preservation techniques, and holding times were in accordance with U.S. EPA requirements specified in 40 CFR Part 136. All samples were placed in a cooler with wet ice and transported to the U.S. EPA Region 2 Laboratory in Edison, New Jersey.

The facility representative declined the EPA offer for split samples.

## 5.0 ANALYTICAL RESULTS

### Trenton Renewable Power Pretreatment CSI – Outfall DSN 001L September 12-13, 2023

Parameter	Discharge to POTW	Discharge Limit – Daily Maximum	Discharge Limit- Monthly Average
pH (su)	7.41	5.5 – 9.5 (range)	--
Flow (gpd)	89,280	Monitor only	--
BOD <sub>5</sub> (mg/l)	380 L	Monitor only	365
TSS (mg/l)	122	Monitor only	303
Phosphorus (mg/l)	7.05	Monitor only	Monitor only
Ammonia (mg/l)	175	Monitor only	Monitor only
Oil and Grease (mg/l)	6.49 UL	100	Monitor only
Arsenic (mg/l)	Not detected	0.9	Monitor only
Cadmium (mg/l)	Not detected	0.03	Monitor only
Chromium (mg/l)	0.006	0.37	Monitor only
Copper (mg/l)	0.0472	0.47	Monitor only
Lead (mg/l)	Not detected	0.19	Monitor only
Nickel (mg/l)	Not detected	0.95	Monitor only
Zinc (mg/l)	0.218	2.60	Monitor only
Mercury (mg/l)	Not detected	0.01	Monitor only

U – The analyte was not detected at or above the reporting limit.

L – The reported value may be biased low.

## 6.0 FINDINGS

### 6.1 Sampling Result Findings

Analytical results indicate that all parameters did not exceed daily maximum discharge limitations in the industrial user permit during the 24-hour sampling survey.

The analytical result for BOD<sub>5</sub> exceeded the monthly average limitation in the industrial user permit but the result was qualified due to toxicity of the sample toward the seed organisms. This is explained in more detail in the project narrative of the attached Laboratory Data Report.

**Trenton Renewable Power LLC  
NJ0218791**

**Inspection Date: September 12-13, 2023**

**7.0 ATTACHMENTS**

Photograph #1  
Laboratory Data Report  
Chain of Custody / Field Data Form

Photo #1: View of the pretreatment discharge location for Outfall DSN 001L.





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 2 Laboratory  
2890 Woodbridge Avenue  
Edison , New Jersey 08837  
732-906-6886 Phone  
732-906-6165 Fax**

September 27, 2023

Bob Morrell  
Monitoring & Assessment Branch  
LSASD/MAB  
Edison, NJ 08837

RE: Trenton Renewable Power LLC - 2309019

Enclosed are the results of analyses for samples received by the laboratory on 09/13/2023. The signature below reflects the laboratory's approval of the reported results. If you have any questions concerning this report, please refer to Project Number 2309019 and contact the laboratory.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Bourbon".

John R. Bourbon  
Chief, LSASD/LB



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region 2 Laboratory**

**Final Report**

**Project: Trenton Renewable Power LLC - 2309019**

**Project Number: 2309019**

**Project Narrative:**

The National Environmental Laboratory Accreditation Conference Institute (TNI) is a voluntary environmental laboratory accreditation association of State and Federal agencies. TNI established and promoted a National Environmental Laboratory Accreditation Program (NELAP) that provides a uniform set of standards for the generation of environmental data that are of known and defensible quality. The EPA Region 2 Laboratory is NELAP accredited. The Laboratory tests that are accredited have met all the requirements established under the TNI Standards.

**Condition Comments**

None

**Comment(s):**

The "Sample Analysis Date and Time" is included in the results section for any analyte with a prescribed holding time of 72 hours or less.

Biochemical Oxygen Demand (BOD) Analysis: Sample 2309019-02 exhibited toxicity toward the seed organisms used for BOD. This is demonstrated by increasing BOD values as sample dilution increases. Only the result for the largest sample dilution is being reported instead of the average of all acceptable dilutions; the average is used when the sample does not exhibit toxicity. Since an even higher sample dilution may have produced a higher BOD result, the sample was qualified with an "L" to indicate the result is biased low.

Oil and Grease Analysis: Sample 2309019-01 was not successfully analyzed using the SPE method. The sample clogged the SPE disk with only a fraction of the sample passing through. A separatory funnel extraction based on method 1664 was also attempted in which an emulsion formed which did not break. The sample is qualified with an L due to failing MS recovery.

**Data Qualifier(s):**

- U- The analyte was not detected at or above the Reporting Limit.
- J- The identification of the analyte is acceptable; the reported value is an estimate.
- K- The identification of the analyte is acceptable; the reported value may be biased high.
- L- The identification of the analyte is acceptable; the reported value may be biased low.
- NJ- There is presumptive evidence that the analyte is present; the analyte is reported as a tentative identification. The reported value is an estimate.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region 2 Laboratory**

**Final Report**

**Project: Trenton Renewable Power LLC - 2309019**

**Project Number: 2309019**

Reporting Limit(s):

The Laboratory was able to achieve the appropriate limit for each analyte requested.

**SUMMARY REPORT FOR SAMPLES**

<b>Field ID</b>	<b>Laboratory ID</b>	<b>Matrix</b>	<b>Date Sampled</b>	<b>Date Received</b>
DSN 001L-Grab	2309019-01	Aqueous	09/12/2023 15:12	09/13/2023 14:30
DSN 001L-24Hr.-Comp	2309019-02	Aqueous	09/13/2023 12:37	09/13/2023 14:30



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region 2 Laboratory**

**Final Report**

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**SUMMARY REPORT FOR METHODS**

<b>Analysis</b>	<b>Method</b>	<b>Certification</b>	<b>Matrix</b>
Ammonia [As N]	EPA 350.1 SOP C-80 Rev 2.8	NELAP	Aqueous
Biochemical Oxygen Demand	SM 5210B SOP C-21 Rev 2.8	NELAP	Aqueous
Mercury	EPA 245.1 SOP C-110 Rev 2.8	NELAP	Aqueous
Metals ICP TAL NPDES/DW	EPA 200.7 SOP C-109 Rev 3.7	NELAP	Aqueous
Oil & Grease	EPA 1664A SOP C-126 Rev 1.7	NELAP	Aqueous
Phosphorus	EPA 365.1 SOP C-68 Rev 2.8	NELAP	Aqueous
Residue, Non-Filterable	SM 2540D SOP C-33 Rev 3.8	NELAP	Aqueous



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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**Project: Trenton Renewable Power LLC - 2309019**

**Project Number: 2309019**

Analyte	Result	Qualifier	Reporting Limit	Units	Batch	Date and Time of Analysis*
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**Field ID: DSN 001L-Grab**

**Sample ID: 2309019-01**

**GC**

Oil & Grease	---	U L	6.49	mg/L	B309090	
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**Field ID: DSN 001L-24Hr.-Comp**

**Sample ID: 2309019-02**

**Metals ICP**

Arsenic	---	U	8.00	ug/L	B309052	
Cadmium	---	U	3.00	ug/L	B309052	
Chromium	6.03		5.00	ug/L	B309052	
Copper	47.2		10.0	ug/L	B309052	
Lead	---	U	8.00	ug/L	B309052	
Nickel	---	U	20.0	ug/L	B309052	
Zinc	218		20.0	ug/L	B309052	

**Mercury CVAA**

Mercury	---	U	0.050	ug/L	B309063	
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**Sanitary**

Ammonia [As N]	175		5.00	mg/L	B309079	
Biochemical Oxygen Demand	380	L	2.00	mg/L	B309068	09/19/2023 08:20
Phosphorus	7.05		0.500	mg/L	B309078	
Total Suspended Solids	122		10.0	mg/L	B309046	



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 2 Laboratory**

**Final Report**

**Project: Trenton Renewable Power LLC - 2309019**

**Project Number: 2309019**

**GC - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
<b>Batch B309090</b>									
<b>Blank (B309090-BLK1)</b>									
Oil & Grease	--- U	5.00	mg/L						
<b>LCS (B309090-BS1)</b>									
Oil & Grease	40.5	5.00	mg/L	40.00		101	78-114		
<b>LCS Dup (B309090-BSD1)</b>									
Oil & Grease	38.9	5.00	mg/L	40.00		97.2	78-114	4.03	20
<b>Matrix Spike (B309090-MS1) Source: 2309012-02</b>									
Oil & Grease	--- U	5.75	mg/L	45.98	4.00	NR	78-114		
<b>Matrix Spike (B309090-MS2) Source: 2309019-01</b>									
Oil & Grease	--- U	6.67	mg/L	53.33	ND		78-114		



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 2 Laboratory**

**Final Report**

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**Project Number: 2309019**

**Metals ICP - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
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**Batch B309052**

**Blank (B309052-BLK1)**

Arsenic	--- U	8.00	ug/L						
Cadmium	--- U	3.00	ug/L						
Chromium	--- U	5.00	ug/L						
Copper	--- U	10.0	ug/L						
Lead	--- U	8.00	ug/L						
Nickel	--- U	20.0	ug/L						
Zinc	--- U	20.0	ug/L						

**LCS (B309052-BS1)**

Arsenic	203	8.00	ug/L	200.0		102	85-115		
Cadmium	201	3.00	ug/L	200.0		101	85-115		
Chromium	203	5.00	ug/L	200.0		102	85-115		
Copper	200	10.0	ug/L	200.0		100	85-115		
Lead	206	8.00	ug/L	200.0		103	85-115		
Nickel	204	20.0	ug/L	200.0		102	85-115		
Zinc	210	20.0	ug/L	200.0		105	85-115		

**LCS Dup (B309052-BSD1)**

Arsenic	206	8.00	ug/L	200.0		103	85-115	1.20	20
Cadmium	203	3.00	ug/L	200.0		102	85-115	1.16	20
Chromium	205	5.00	ug/L	200.0		103	85-115	0.891	20
Copper	203	10.0	ug/L	200.0		101	85-115	1.05	20
Lead	208	8.00	ug/L	200.0		104	85-115	0.811	20
Nickel	206	20.0	ug/L	200.0		103	85-115	0.957	20
Zinc	212	20.0	ug/L	200.0		106	85-115	0.921	20

**Matrix Spike (B309052-MS1)**

**Source: 2309019-02**

Arsenic	202	8.00	ug/L	200.0	ND	101	80-120		
Cadmium	194	3.00	ug/L	200.0	ND	96.9	80-120		
Chromium	204	5.00	ug/L	200.0	6.03	98.8	80-120		
Copper	254	10.0	ug/L	200.0	47.2	103	80-120		
Lead	199	8.00	ug/L	200.0	2.85	97.9	80-120		
Nickel	209	20.0	ug/L	200.0	13.3	97.9	80-120		
Zinc	425	20.0	ug/L	200.0	218	104	80-120		



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 2 Laboratory**

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**Metals ICP - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
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**Batch B309052**

**Matrix Spike Dup (B309052-MSD1)**

**Source: 2309019-02**

Arsenic	205	40.0	ug/L	200.0	ND	103	80-120	1.56	10
Cadmium	198	15.0	ug/L	200.0	ND	99.0	80-120	2.19	10
Chromium	204	25.0	ug/L	200.0	ND	102	80-120	0.0196	10
Copper	250	50.0	ug/L	200.0	47.2	102	80-120	1.45	10
Lead	199	40.0	ug/L	200.0	ND	99.4	80-120	0.0403	10
Nickel	211	100	ug/L	200.0	13.3	99.0	80-120	1.06	10
Zinc	429	100	ug/L	200.0	218	106	80-120	0.934	10





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region 2 Laboratory**

**Final Report**

**Project: Trenton Renewable Power LLC - 2309019**

**Project Number: 2309019**

**Sanitary - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
<b>Batch B309046</b>									
<b>Blank (B309046-BLK1)</b>									
Residue, Non-Filterable	--- U	10.0	mg/L						
<b>LCS (B309046-BS1)</b>									
Residue, Non-Filterable	96.0	10.0	mg/L	96.70		99.3	85-115		
<b>LCS Dup (B309046-BSD1)</b>									
Residue, Non-Filterable	95.0	10.0	mg/L	96.70		98.2	85-115	1.05	20
<b>Duplicate (B309046-DUP1) Source: 2309019-02</b>									
Residue, Non-Filterable	112	10.0	mg/L		122			8.55	20
<b>Batch B309068</b>									
<b>Blank (B309068-BLK1)</b>									
Biochemical Oxygen Demand	--- U	2.00	mg/L						
<b>LCS (B309068-BS1)</b>									
Biochemical Oxygen Demand	413		mg/L	396.0		104	84.6-115.4		
<b>LCS (B309068-BS2)</b>									
Biochemical Oxygen Demand	397		mg/L	396.0		100	84.6-115.4		
<b>LCS (B309068-BS3)</b>									
Biochemical Oxygen Demand	407		mg/L	396.0		103	84.6-115.4		
<b>Matrix Spike (B309068-MS1) Source: 2309019-02</b>									
Biochemical Oxygen Demand	693	2.00	mg/L	396.0	380	79.1	75-125		



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Region 2 Laboratory**

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**Sanitary - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
<b>Batch B309068</b>									
<b>Matrix Spike Dup (B309068-MSD1)</b>		<b>Source: 2309019-02</b>							
Biochemical Oxygen Demand	634	2.00	mg/L	396.0	380	64.2	75-125	8.89	200
<b>Batch B309078</b>									
<b>Blank (B309078-BLK1)</b>									
Phosphorus	--- U	0.0500	mg/L						
<b>Blank (B309078-BLK2)</b>									
Phosphorus	--- U	0.0500	mg/L						
<b>LCS (B309078-BS1)</b>									
Phosphorus	8.67	0.250	mg/L	8.450		103	90-110		
<b>LCS Dup (B309078-BSD1)</b>									
Phosphorus	8.71	0.250	mg/L	8.450		103	90-110	0.5	20
<b>Matrix Spike (B309078-MS1)</b>		<b>Source: 2309011-01</b>							
Phosphorus	1.44	0.0500	mg/L	1.000	0.484	96	90-110		
<b>Matrix Spike (B309078-MS2)</b>		<b>Source: 2309019-02</b>							
Phosphorus	7.55	0.500	mg/L	1.000	7.05	50	90-110		
<b>Batch B309079</b>									
<b>Blank (B309079-BLK1)</b>									
Ammonia [As N]	--- U	0.100	mg/L						



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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**Final Report**

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**Sanitary - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
<b>Batch B309079</b>									
<b>Blank (B309079-BLK2)</b>									
Ammonia [As N]	--- U	0.100	mg/L						
<b>LCS (B309079-BS1)</b>									
Ammonia [As N]	7.79	0.100	mg/L	8.340		93	90-110		
<b>LCS Dup (B309079-BSD1)</b>									
Ammonia [As N]	7.70	0.100	mg/L	8.340		92	90-110	1	20
<b>Matrix Spike (B309079-MS1) Source: 2309011-01</b>									
Ammonia [As N]	4.89	0.100	mg/L	5.000	0.161	95	90-110		
<b>Matrix Spike (B309079-MS2) Source: 2309019-02</b>									
Ammonia [As N]	167	5.00	mg/L	5.000	175	NR	90-110		

US EPA REGION 2 LABORATORY  
CHAIN OF CUSTODY/ FIELD DATA FORM

SURVEY NAME & LOCALITY: Trenton Renewable Power LLC  
 PROGRAM: SF  PROJECT LEADER: Bob Morrell  
 Decision Unit Code: Y206 RCRA D210 RCRA ENF D307 OPERABLE UNIT: SDWA  AM  CAA  TSCA  OO  FERA  CRIMINAL ENF   
 B304 C215 B224 A305 B253 L306

LAB ID/ FIELD ID	CONTENTS	CHECK IF SPLIT SAMPLE	DESCRIPTION & INSTRUCTIONS INCLUDING LOCATION, ESTIMATED CONCENTRATIONS, SPECIAL REPORTING LIMITS	PRESERVATIVE (circle)	PRESERVATIVE ADDED & CHECKED	COLLECTION TIME		COLLECTION DATE
						Begin	End	
0218791	3 A	<input type="checkbox"/>	3 Liter glass jar for Oil and Grease	0123456789 10	1-H2SO4 pH2 2-HNO3 pH2 3-HCl pH2 4-Na2SO3 5-NaOH pH9 6-Ascorbic Acid	12:37	1:52	09/12/03
	5 A	<input type="checkbox"/>	2 Liter plastic jars for BODs	0123456789 10		12:37	1:52	09/12/03
		<input type="checkbox"/>	1 500-ml plastic jar for TSS	0123456789 10				
		<input type="checkbox"/>	1 250-ml plastic jar for Ammonia/Nitral Phosphate	0123456789 10				
		<input type="checkbox"/>	1 250-ml plastic jar for Metals (As, Cd, Cr, Cu, Ni, Zn, Pb)	0123456789 10				
		<input type="checkbox"/>		0123456789 10				
		<input type="checkbox"/>		0123456789 10				
		<input type="checkbox"/>		0123456789 10				

COMMENTS & SPECIAL REQUIREMENTS  
 \* Oil + grease samples - highly reactive to HCl preservation.

Matrix: <input type="checkbox"/> Aqueous (chromated) <input type="checkbox"/> Ferrous <input type="checkbox"/> Inhibitor <input type="checkbox"/> Incol <input type="checkbox"/> Residue <input type="checkbox"/> Other	Relinquished By: <u>Robert A. Morrell</u>	Person Assuming Responsibility for Sample: <u>Robert A. Morrell</u>	Time: 12:37	Date: 9/12/03
Survey Complete? <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>	Relinquished By:	Received By: <u>[Signature]</u>	Time: 14:30	Date: 9/12/03

Discreet Blood Sample - Richard J. Judd, 9/12/03, revised 10/25/2004