



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

VIA EMAIL TRANSMISSION: kweekly@wmua.info

Kara Weekly, Director of Operations and Maintenance
433 John F. Kennedy Way
Willingboro, New Jersey 08046

Re: **Sanitary Sewer System Compliance Evaluation Inspection**
Willingboro Township Municipal Utilities Authority, Sanitary Sewer System
NJPDES Tracking ID No. NJ0023361

Dear Ms. Weekly:

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 August 27, 2024. The principal purpose of the SSS CEI was to assess your system's adequacy in minimizing Sanitary Sewer Overflows (SSOs).

Willingboro Township Municipal Utilities Authority (Authority) provided documentation for twenty-four (24) SSOs from its sewer system from 2021 to EPA's CEI. Seventeen (17) of these SSOs were caused by blockages in the Authority's sewer system.

Based on information provided during the CEI, EPA identified an **Area of Concern**, and a **Potential Non-Compliance Item**. Within **thirty (30) calendar days** of receipt of this letter, please respond to the EPA in writing regarding the items listed under **Area of Concern** and **Potential Non-Compliance** in the CEI report.

Please note that overall compliance of your 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**



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

Digitally signed by LARRY
GAUGLER
Date: 2024.10.24 13:05:51
-04'00'

cc: Bryan Barrett, Bureau Chief, NJDEP Southern Bureau of Water Compliance and Enforcement,
Bryan.Barrett@dep.nj.gov
Charles Bisese, NJDEP, Charles.Bisese@dep.nj.gov
Doug Borger, Sewer Superintendent, dborger@wmua.info

**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: Willingboro Township Municipal Utilities Authority		NPDES/ICIS No.: NJ0023361	
Inspection Entry Date: August 27, 2024 Inspection Entry Time: 9:00 AM		Inspection Exit Date: August 27, 2024 Inspection Exit Time: 3:15 PM	
Facility Inspected: Willingboro Water Pollution Control Facility Ironsides Court Willingboro Township, New Jersey, 08046		Lat, Long: Outfall 001A Latitude: 40° 01' 41.1" Longitude: 74° 55' 16.8" 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			
On-Site Facility Representative(s): Kara Weekly, Director of Operations and Maintenance, (609) 877-2900 Doug Borger, Sewer Superintendent, S3/C3 Operator, (609) 877-2900 Daryl James, Assistant PCP Operator, (609) 877-2900			
Responsible Official: Kara Weekly, Director of Operations and Maintenance, (609) 877-2900			
Name and Signature of Inspector		Agency/Office/Phone Number	Date
<p>Ali, Zarine  Digitally signed by Ali, Zarine Date: 2024.10.24 12:51:41 -04'00'</p> <p>Zarine Ali, Physical Scientist</p>		R2-ECAD-WCB/212-637-3919	
Name and Signature of Management QA Reviewer		Agency/Office/Phone Number	Date
<p>LARRY GAUGLER  Digitally signed by LARRY GAUGLER Date: 2024.10.24 13:06:30 -04'00'</p> <p>Larry Gaugler, P.E., SCWCP Team Leader</p>		R2-ECAD-WCB/212-637-3950	

I. Introduction:

On August 27, 2024, the United States Environmental Protection Agency (EPA) Region 2, conducted a Sanitary Sewer System (SSS) Compliance Evaluation Inspection (CEI), of the

Willingboro Township Municipal Utilities Authority, hereinafter designated “Authority,” sanitary sewer collection system. The purpose of this SSS CEI was to access the adequacy of the system’s minimization of the release of sanitary sewage. The Authority’s representatives at the CEI included: Ms. Kara Weekly (Director of Operations and Maintenance), Mr. Doug Borger (Sewer Superintendent), and Mr. Daryl James (Assistant PCP Operator). Ms. Zarine Ali, of EPA Region 2, led the CEI, and presented credentials to the Authority’s representatives upon arrival. Weather conditions at the time of the CEI was approximately 88°F and sunny.

II. Inspection Findings:

1. The Authority has coverage under a New Jersey Pollutant Discharge Elimination System (NJPDES) Permit No. NJ0023361, for treated effluent discharges from the Willingboro Water Pollution Control Facility (WPCF) to the Rancocas Creek, via permitted outfall 001A.
2. According to the Authority’s Permit, the WPCF has a permitted capacity of 5.22 MGD. The Authority owns and maintains the entire collection system within Willingboro Township. The entire collection system has separate sanitary sewer piping.
3. The permit has an effective date of 02/01/2020, and an expiration date of 01/31/2025.
4. Willingboro Township has a population of approximately 35,000.
5. The WPCF receives all flow from Willingboro Township, all flow from the Township of Edgewater Park, and certain portions of Westampton Township. The Authority provided copies of the agreement it has with Edgewater Park Sewerage Authority, and the agreement it has with Westampton Township.
6. The collection system dates from 1958. The piping in the collection system is between 6” and 36” in diameter. The Authority’s collection system has in excess of 46,000 feet of polyvinyl chloride (PVC) piping, in excess of 4,000 feet of ductile iron piping (DIP), almost 30,800 feet of Reinforced Concrete Piping (RCP), and approximately 556,000 feet of Asbestos Cement Piping (ACP).
7. The collection system has 800 manholes. Almost all of the manholes in the system are located in backyards.
8. The Authority’s entire collection system is on GIS.

Pump Stations:

9. The Authority owns and operates four (4) Pump Stations: Tweedstone Pump Station, Beechnut Drive Pump Station, Windsor Park Pump Station, and Lake Drive Pump Station. The pump stations are inspected every Monday and Friday.

10. The pump stations all have on-site generators, have by-pass capabilities, and alarm systems. The Authority also has two (2) portable generators for use if needed.
11. The generators are exercised monthly, and quarterly maintenance is also done.

Flow Metering and Billing:

12. The Authority has posted on its website its schedule of rates effective 1/1/2024. This document details the schedule of rates for residential water and/or sewer service charges, and for commercial water and/or sewer service charges. Residents are billed on a quarterly basis.

SSO Discharges / Spills:

13. The Authority provided documentation for twenty-four (24) SSOs from its system from 2021 to EPA's CEI. The following are SSOs that the Authority provided documentation for:

Date	Location	Cause	Approximate Volume	Receiving Waterbody	SSO Number.
2/18/2021	43 Paddock Lane	Grease and rag blockage was found in 3 manholes.	The report submitted to NJDEP does not mention the volume or duration of the SSO.	The report does not mention if the wastewater went to a storm drain.	SSO 1
2/23/2021	Blockage and sewer spill at manhole M 36-12. The manhole that needed to be jetted was located in the back of Pennypacker Drive. The complaint was from 39 Paddock Lane.	Grease	More than 250 gallons of sewage was released. The exact volume is unknown.	No waterway impacted.	SSO 2
3/09/2021	Blockage and sewer spill at manhole IC-1.	Blockage in a manhole.	200 gallons	No waterway impacted.	SSO 3

	The complaint came from 11 Bonnie Lane.				
3/15/2021	74 Club House Drive.	Blockage due to tree roots.	100 gallons	No waterbody impacted.	SSO 4
4/26/2021	Manhole D4. To clear the blockage the Authority jetted upstream from the influent manhole at the WPCF.	Blockage in manhole.	The report does not mention the volume of the SSO.	The report does not mention if any waterbody was impacted.	SSO 5
5/23/2021 and again on 5/25/2021	1 Minstrel Lane	Grease blockage.	Grease spill of 15 gallons from the sewer main. Grease was mixed with less than 1 gallon of sewer water.	No waterbody impacted.	SSO 6
6/28/2021	Blockage and sewer spill from manhole 1C-1. The complaint came from 15 Bonnie Lane.	Blockage in manhole.	The report submitted to NJDEP does not mention the volume or duration of the SSO.	The report does not mention if the wastewater went to a storm drain.	SSO 7
7/23/2021	Blockage and sewer spill from a manhole. The report submitted to NJDEP does not mention where the SSO occurred.	Blockage in manhole.	The report submitted to NJDEP does not mention the volume or duration of the SSO.	The report does not mention if the wastewater went to a storm drain.	SSO 8

9/17/2021	Sewer spill at Tweedstone Pump Station.	The pumps at the station would not operate due to over voltage on the 3 phases. When this occurred the control panel shut down the pumps in a motor saver mode. The verbatim alarm system was disarmed.	The volume of the SSO could not be determined.	There was no visible signs that the SSO made its way to the Rancocas Creek.	SSO 9
10/18/2021	11 Hampshire Lane. The homeowner's lateral overflowed at their cleanout.	Blockage in the sewer main.	Less than 50 gallons into the homeowner's backyard.	No waterbody impacted.	SSO 10
10/21/2021	70 Eastbrook Lane.	Blockage	Less than 50 gallons.	The SSO went into a storm drain that discharges into a dry area called "Reserved for Drainage."	SSO 11
12/01/2021	Barlett Lane, a line that crosses the creek.	The line was compromised and repairs were done.	The report submitted to NJDEP does not mention the volume.	A local creek.	SSO 12
12/02/2021	Charleston Road/Birchwood Lane	Blockage in manhole.	The SSO was estimated at 3 gallons per minute. The report submitted to NJDEP does not mention the volume or duration.	Local stream	SSO 13

2/20/2022	23 Barnwell Lane	Blockage in manhole.	4,620 gallons. From the time of the call to when the SSO stopped was 154 minutes (8:36 AM to 11:10 AM). The SSO was estimated at 30 GPM.	Mill Creek	SSO 14
7/17/2022	64 Winterberry Lane	Blockage in manhole.	500 gallons	None	SSO 15
8/05/2022	23 Glenview Lane	A 14" pipe was clogged with grease.	6,000 gallons	South Branch Mill Creek	SSO 16
1/08/2023	9 Edgely Road	Blockage in manhole.	225 gallons	Storm drain	SSO 17
1/31/2023	74 Clubhouse Drive.	Blockage in manhole.	125 gallons	Storm drain	SSO 18
8/11/2023	7 Glenview Road	A 14" pipe was clogged with grease. The line was added to the quarterly hotspot flushing program.	1,800 gallons	South Branch Mill Creek.	SSO 19
12/07/2023	75 Marshal Lane	There was a partial collapse in the line. This caused a blockage.	28,800 gallons	Storm drain.	SSO 20
12/18/2023	Barnwell, Manhole IM-7.	Inflow/Infiltration (I/I) due to heavy rainfall. Manhole IM-7 was surrounded by the creek that was flooded due to heavy rainfall.	100 gallons	Local creek.	SSO 21
3/24/2024	70 Eastbrook Lane.	Rain event	300 gallons	Storm drain.	SSO 22

4/04/2024	Two SSOs occurred. One was at 74 East Lane, and the other was at 7 Echo Lane.	Heavy rain.	74 East Lane approximately 700 gallons entered the nearby storm drain. 7 Echo Lane, approximately 330 gallons entered the closest storm drain.	Storm drain	SSO 23, and SSO 24.
-----------	---	-------------	---	-------------	---------------------

Residential Complaints/ Collection System Insurance:

14. Insurance for the Authority’s sewer system is maintained through the New Jersey Utility Authority Joint Insurance Fund. The Authority remembers two (2) claims that were filed last year.
 - 1/31/2023 – At 74 Club Drive, the Authority was responding to a blockage. Sewage overflowed the vent.
 - 11/27/2023 – At 29 General Lane, the claim was unfounded as a diaper was in the homeowner’s lateral, the Authority used Rapid Restoration to assess the situation.
15. The Authority is responsible only for the main. Homeowners are responsible for their lateral to the connection point in the main.
16. According to the Authority, most homes do not have basements so there is nothing below grade at these properties.

Capacity Issues/Collection System Maintenance:

17. The Authority provided a spreadsheet with its 5-year Capital Plan. For the years 2024 through 2028, sanitary sewer rehab is allocated 6,000,000 each year or an estimated total of 30,000,000. In the 2024 budget, sewer collection system resiliency was allocated 2,000,000.
18. In an email to EPA dated 8/30/2024, the Authority provided its preventative sewer main cleaning totals for 2024. As of 8/30/2024, the Authority televised and flushed 1,115 feet of piping, cleaned eleven (11) mains, and televised ten (10) sewer mains.

19. According to the Authority, approximately 80% of its collection system has been televised. Redzone is doing projects based on the scoring, and every month Redzone develops a report. The Authority said televising of its system is done year round. The only time televising is not done is when the camera is down.
20. The Authority provided copies of reports from Redzone, dated 6/25/2024 and 7/29/2024. Included in these reports are: maintenance completed by Redzone, areas where further inspections/investigations are needed, projects that went out for bid, and locations where jetting needed to be done.
21. The Authority has two (2) Jet trucks for the maintenance of its sewer system.
22. At the time of the CEI, the Authority said it asked Pennoni Engineers to provide the cost to conduct an I/I study of its entire sewer system. The Authority said this will be done in a 5-year program with flow meters installed.
23. Part I of the Permit, "General Requirements: NJPDES" Section A, General Requirements of all NJPDES Permits, requires compliance with Part 1 (Requirements Incorporated by Reference). Part 1, paragraph a., states that *"The permittee shall comply with all conditions set forth in this permit and with all the applicable requirements incorporated into this permit by reference. The permittee is required to comply with the regulations, including those cited in paragraphs b. through e. following, which are in effect as of the effective date of the final permit."* Paragraph c requires compliance with N.J.A.C. 7:14A-6.12 (Proper Operation and Maintenance). According to N.J.A.C. 7:14A-6.12(c):

"All permittees shall submit written verification to the Department that an operation and maintenance manual for the treatment works, including related appurtenances and collection system, has been or will be completed by the effective date or a compliance date included in a new or renewed NJPDES permit issued subsequent to May 5, 1997."

The Authority provided a copy of its "General Collection System Operations and Maintenance Manual" dated March 7, 2019. The Authority's "Emergency Response Plan" updated July 24, 2024, was also provided to EPA. At the time of the CEI, Mr. Doug Boger, the Authority's recently hired Sewer Superintendent as of July 22, 2024, told EPA that the O&M Manual for the collection system will be updated. On May 15, 2018, EPA issued the Authority an Administrative Compliance Order, CWA-02-2018-3029, to develop a written O&M Manual and written O&M procedures for its collection system.

III. Area of Concern:

1. At the time of the CEI, the Authority was not conducting inspections of grease traps/interceptors at restaurants. During the fieldwork component of EPA's inspection, photographs were taken of a grease disposal container with grease spilled on the outside and evidence that grease was dumped on a grass area that is close to a storm drain (field work photograph #6). An accumulation of grease was also observed in the wet wells of the Lake

Drive Pump Station, Windsor Pump Station, and Tweedstone Pump Station. Please provide a response to the following:

- a). Does the Authority or Willingboro Township have Best Management Practices in place to ensure the proper disposal of grease from food establishments?
- b). Who is responsible for inspecting grease traps/interceptors at food establishments?
- c). What steps will the Authority take to ensure that an accumulation of grease from food establishments does not enter its sewer system?

IV. Potential Non-compliance:

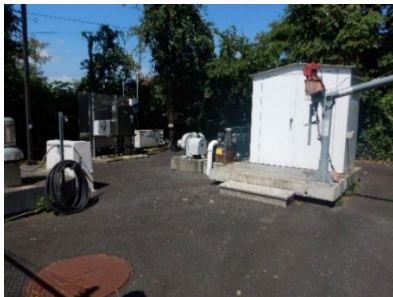
1. The Authority provided documentation for twenty (24) SSOs from its collection system from 2021 to EPA’s CEI. Seventeen (17) of these SSOs were caused by blockages. The Authority has written O&M procedures for its collection system and EPA is concerned about the Authority’s implementation of these procedures in particular:

- a) For each SSO caused by a blockage, indicate what the Authority’s current written O&M procedures state regarding how such a blockage is to be addressed and proactively avoided.
- b) Provide revised written O&M procedures regarding addressing and proactively avoiding blockages which will realistically minimize SSOs within the collection system.

V. Field Work

1. Lake Drive Pump Station

A view of the station, its on-site generator, and wet well. At the time of the CEI, the wet well had an accumulation of grease. The wet well is cleaned as needed (3 Photographs).



2. Windsor Pump Station. A view of the station, and its on-site generator (2 Photographs).



Windsor Pump Station's flow meter, and wet well (2 Photographs). At the time of the CEI, the wet well had an accumulation of grease. The wet well was cleaned about 2 months before EPA's inspection.



3. Beechnut Pump Station

A view of the station, its on-site generator, and wet well (3 Photographs).



4. Tweedstone Pump Station

The station's on-site generator, control panel with alarm system, and wet well. At the time of the CEI, the wet well had an accumulation of grease (3 Photographs).



5. Manhole that receives flow from Mr. Cheng's restaurant and a few additional restaurants.

The manhole is located at the back of the building (1 Photograph).



6. Grease disposal container behind Mr. Cheng's restaurant, and evidence that grease was dumped on a grass area (3 Photographs).



Grease on a grass area.

7. Manhole at Echo Lane and Echohill Lane (1 Photograph).

At the time of the CEI, this manhole was clean. The Authority said in this area the street floods and has received flash flood warnings.



8. Manhole behind the Kennedy Shopping Center. At the time of the CEI, the manhole was clean (1 Photograph).



9. Manhole behind Stop One. At the time of the CEI, the manhole was clean (2 Photographs).



10. Treated Effluent leaving the WPCF, and outfall sign (2 Photographs).



VI. The Authority provided the following information:

1. Supporting documents in response to EPA's sewer system questionnaire.