
From: DEP WaterQuality <WaterQuality@dep.nj.gov>

Sent: Monday, March 23, 2020 3:40 PM

To: DEP WaterQuality <WaterQuality@dep.nj.gov>

Subject: NJDEP Guidance for Reduced Monitoring Frequency for Sanitary Wastewater Dischargers

The New Jersey Department of Environmental Protection (DEP) understands that the unprecedented circumstances of the COVID-19 outbreak, including the need to restrict unnecessary travel and adopt social distancing practices as described in Executive Order 107, has created limitations for many regulated entities, including water and wastewater systems. DEP has been and will continue working to ensure that we are responsive to these circumstances by providing the needed regulatory flexibility while protecting public health and safety. DEP is currently evaluating wastewater requirements and establishing guidelines that will allow wastewater facilities to focus their attention on the highest priorities, while continuing to conduct the necessary monitoring that helps ensure public health and safety.

At this time, the DEP is giving you preliminary guidance to ensure wastewater systems' continued compliance with regulatory requirements while reducing strain on resources. DEP will continue to provide you with guidance as the situation evolves. We recommend that you frequently check the DEP's Division of Water Quality's website available at <https://www.state.nj.us/dep/dwq> for further updates.

Please see the attached guidance document that the DEP has prepared.

To: All NJPDES Sanitary/Domestic Wastewater Dischargers to Surface Water (Category A and ASC)

From: Division of Water Quality

Re: **Reduced Monitoring Frequency for Sanitary Wastewater Dischargers**

Date: March 23, 2020

The New Jersey Department of Environmental Protection (DEP) understands that the unprecedented circumstances of the COVID-19 outbreak, including the need to restrict unnecessary travel and adopt social distancing practices as described in [Executive Order 107](#), has created limitations for many regulated entities, including water and wastewater systems. DEP has been and will continue working to ensure that we are responsive to these circumstances by providing the needed regulatory flexibility while protecting public health and safety. DEP is currently evaluating wastewater requirements and establishing guidelines that will allow wastewater facilities to focus their attention on the highest priorities, while continuing to conduct the necessary monitoring that helps ensure public health and safety.

At this time, the DEP is giving you preliminary guidance to ensure wastewater systems' continued compliance with regulatory requirements while reducing strain on resources. DEP will continue to provide you with guidance as the situation evolves. We recommend that you frequently check the DEP's Division of Water Quality's website available at <https://www.state.nj.us/dep/dwq> for further updates. In an effort to continue to work together during this unprecedented time, the DEP strongly encourages you to contact us via email at DWQ@dep.nj.gov with questions, concerns and difficulties you may encounter regarding your regulatory requirements.

Reduction in Monitoring Frequency for Sanitary/Domestic Treatment Works Discharging to Surface Water

Pursuant to N.J.A.C. 7:14A-17.6(i), effective immediately, the Department has determined to stay monitoring frequency conditions contained in NJPDES Category A and ASC Discharge to Surface Water permits conditioned upon the permittee complying with the frequencies and conditions noted below. Permittees are authorized to reduce the monitoring frequency from that required in their NJPDES Category A and ASC Discharge to Surface Water Permits to those interim frequencies indicated by underline in Charts 14-3 and 14-4 below and in accordance with the following:

1. Permittees that reduce monitoring frequencies in accordance with this guidance DO NOT need to report that reduced monitoring frequency as non-compliance pursuant to N.J.A.C. 7:14A-6.10, however they DO need to report the accurate monitoring frequency in the monitoring frequency box on the Monitoring Report Form's (MRF);
2. Permittees that reduce monitoring frequencies for a parameter(s) such that monitoring for that parameter(s) was not conducted for a particular Monitoring Report Form's (MRF) specified monitoring period shall report CODE = N for that parameter(s) on that MRF;
3. This guidance DOES NOT supersede any required monitoring frequency specified in an executed Administrative Consent Order (ACO). Contact the assigned enforcement inspector regarding any changes to monitoring frequencies specified in an ACO;
4. If a permittee's monitoring frequency specified in its current NJPDES DSW Permit is already reduced to the 'reduced frequency' noted in the charts below, no further reduction is authorized at this time;

5. If a permittee's monitoring frequency specified in its current NJPDES DSW Permit for a particular parameter is more stringent than the official regulatory required frequency noted in parentheses in the charts below, the permittee may begin to monitor according to the associated 'reduced frequency' noted in the charts below.

Interim Monitoring Frequencies under Table 14-4, N.J.A.C. 7:14A-14.2(a)

CONVENTIONAL AND NONCONVENTIONAL PARAMETERS MONITORING FREQUENCY REQUIREMENTS
APPLICABLE TO DOMESTIC TREATMENT WORKS

CURRENT VERSUS REVISED MONITORING FREQUENCIES (SHOWN IN UNDERLINE) APPLICABLE DURING THE COVID-19 PANDEMIC FOR CATEGORY A AND ASC PERMITTEES

Parameter (1)	Effluent Flow (MGD)							
	<0.05	0.05-0.1	>0.1-0.5	>0.5-1.0	>1.0-5.0	>5.0-10	>10-15	>15.00
BOD, CBOD, NBOD, FSOD, TOC, COD, TSS, TDS, Phosphorus, Nitrogen (all forms), Alkalinity, Hardness, Color, and any other parameter that can be composite sampled	1/month	(2/month) 4/hr comp	(2/month) 6hr/comp	(3/month) 6 hr comp	(1/week) 24 hr comp	(2/week) 24 hr comp	(3/week) 24 hr comp	(1/day) 24 hr comp
	<u>No change</u>	<u>1/month</u>	<u>1/month</u>	<u>1/month</u>	<u>2/month</u>	<u>1/week</u>	<u>1/week</u>	<u>2/week</u>
Dissolved Oxygen	1/month	(2/month)	(2/month)	(3/month)	1/week	(2/week)	(3/week)	(1/day)
	<u>No change</u>	<u>1/month</u>	<u>1/month</u>	<u>1/month</u>	<u>2/month</u>	<u>1/week</u>	<u>1/week</u>	<u>2/week</u>
pH, CPO, Settleable solids, Temperature	(1/day)	(1/day)	(1/day)	(1/day)	(2/day)	(3/day)	(3/day)	(6/day)
	<u>2/week</u>	<u>2/week</u>	<u>2/week</u>	<u>2/week</u>	<u>1/day</u>	<u>1/day</u>	<u>1/day</u>	<u>1/day</u>
Bacterial Indicator (2) (limit imposed or no limit imposed)	1/month	(1/month)	(2/month or 1/month)	(2/month or 1/month)	(4/month)	(8/month)	(8/month)	(1/day or 1/month)
	<u>No change</u>	<u>No change</u>	<u>1/month</u>	<u>1/month</u>	<u>2/month</u>	<u>1/week</u>	<u>1/week</u>	<u>2/week</u>
Oil and Grease (3) (petroleum or no petroleum based component)	(1/month or 1/quarter)	(1/month or 1/quarter)	(2/month or 1/quarter)	(2/month or 1/quarter)	(1/week or 1/month)	(2/week or 1/month)	(2/week or 2/month)	(2/week or 2/month)
	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/month</u>	<u>1/month</u>	<u>1/month</u>	<u>1/month</u>

(1) - All samples are GRAB unless otherwise noted. Comp = Composite sample.

(2) - These reduced frequencies indicated above apply whether effluent limitations for bacterial indicators (e.Coli, enterococci, and/or fecal coliform) limits have been imposed in the Domestic Treatment Works' NJPDES Discharge to Surface Water Permits.

(3) - These reduced frequencies indicated above apply whether or not the Oil & Grease in the influent to the Domestic Treatment Works contains petroleum or non-petroleum based components.

Interim Monitoring Frequencies under Table 14-3 N.J.A.C. 7:14A-14.2(a)

TOXIC METALS AND ORGANIC COMPOUNDS AND WHOLE EFFLUENT TOXICITY MONITORING FREQUENCY REQUIREMENTS APPLICABLE TO DOMESTIC TREATMENT WORKS

CURRENT VERSUS REVISED MONITORING FREQUENCIES (SHOWN IN UNDERLINE) APPLICABLE DURING THE COVID-19 PANDEMIC

Parameter	All Major Facilities	All Minor Facilities
Toxic Metals(1) and Cyanide	(1/Month ((G) for cyanide) (24 hr (C) for Toxic Metals)) <u>All monitoring for these parameters is suspended until July 1st</u> <u>Monthly monitoring for these parameters that has not been completed for March, monitoring is suspended until July 1st</u>	(1/Month (3)) <u>All monitoring for these parameters is suspended until July 1st</u> <u>Monthly monitoring for these parameters that has not been completed for March, monitoring is suspended until July 1st</u>
Toxic Organic Compounds (2)	(1/Month ((G) for volatile organic compounds) (24 hr (C) for all other compounds) <u>All monitoring for these parameters is suspended until July 1st</u> <u>Monthly monitoring for these parameters that has not been completed for March, monitoring is suspended until July 1st</u>	(1/Quarter (G) for volatile organic compounds) (3)) <u>All monitoring for these parameters is suspended until July 1st</u> <u>Monthly monitoring for these parameters that has not been completed for March, monitoring is suspended until July 1st</u>
Whole Effluent Toxicity (4)	1/Quarter <u>Suspended until July 1</u>	1/Quarter <u>Suspended until July 1</u>

Footnotes: C = Composite sample. G = Grab sample.

(1) A full listing of all toxic metals can be found in N.J.A.C. 7:14A-4, Appendix A, Table III.

(2) A full listing of all organic toxic compounds can be found in N.J.A.C. 7:14A-4, Appendix A, Table II.

(3) For cyanide sampling, grab samples shall be taken. The required sample type (based on flow in MGD) for toxic metals and all toxic organic compounds, except volatile organic compounds, for minor facilities is:

- i. Grab sample for a flow less than 0.05 MGD;
- ii. Four-hour composite sample for a flow of 0.05 up to and including 0.1 MGD;
- ii. Six-hour composite sample for a flow greater than 0.1 up to and including 1.0 MGD.

(4) Increased Whole Effluent Toxicity testing required pursuant to the Toxicity Reduction Investigation Requirements in Part IV of the NJPDES permits is also suspended until July 1.