



de maximis, inc.

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Clinton, NJ 08809
(908) 735-9315
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October 25, 2011

Gayle Pagano and Robert Downes
Camden County Municipal Utilities Authority
1645 Ferry Avenue
Camden, New Jersey 08104

VIA ELECTRONIC MAIL

**RE: GEMS Phase II Site Trust
Industrial Discharge Monitoring Report (September 2011)**

Dear Ms. Pagano and Mr. Downes:

Enclosed please find the Industrial Discharge Monitoring Report (IDMR) for the GEMS Landfill pretreatment system for September 2011. Monitoring was performed at the frequency specified in the most recent permit modification which went into effect February 1, 2009.

Additionally, this letter seeks approval for an affirmative defense of Sulfide monitoring parameter (Report # 460-30930; sampled 002-09-12-11). Due to lab error, the Sulfide analysis was run outside of EPA's recommended hold time. In support of this application, please find a copy of the laboratory's case narrative in the above referenced report attached to this submission. We request that an affirmative defense be granted related to this lab error.

CCMUA continues to have near real-time access to all laboratory data via internet password-protected access to the laboratory.

Effective as of the March 2010 report, the IDMR and supporting data are now being submitted electronically. Please advise of any necessary changes or concerns. As always, if you have any questions please do not hesitate to contact me at (908) 735-9315.

Very truly yours,

de maximis, inc.

William J. Lee

cc: S. Wohleb, NJDEP (w/o data)
T. Mitchell, USEPA (w/o data)
GEMS Phase II Trust (w/o data)
R. Benson, GTMUA (w/o data)

INDUSTRIAL DISCHARGE MONITORING REPORT (IDMR)

NAME : GEMS Site Phase II Trust
ADDRESS : Erial and Turnersville-Hickstown Rd.
 Gloucester, NJ 08030

PERMIT NUMBER
4953-BTCI-1

DISCHARGE NUMBER
002

SAMPLE DATE
09/01/11-09/30/11

FACILITY CONTACT : Tom Thomas

NOTE: PLEASE READ IDMR CHECKLIST BEFORE COMPLETING THIS FORM.

PARAMETER		QUALITY OR CONCENTRATION				SAMPLE FREQUENCY	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS		
Arsenic, Total	SAMPLE MEASUREMENT	<0.1	<0.1	<0.1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT	1.0	1.0	1.0		ONE/2 WEEKS	24 HOUR COMPOSITE
Beryllium, Total	SAMPLE MEASUREMENT	<1	<1	<1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT	NL	NL	NL		ONE/2 WEEKS	24 HOUR COMPOSITE
Cadmium, Total	SAMPLE MEASUREMENT	<0.01	<0.01	<0.01	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT	0.04	0.04	0.04		ONE/2 WEEKS	24 HOUR COMPOSITE
Chromium, Total	SAMPLE MEASUREMENT	<0.1	<0.1	<0.1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT	2.0	2.0	2.0		ONE/2 WEEKS	24 HOUR COMPOSITE
Cyanide, Total	SAMPLE MEASUREMENT	<0.1	<0.1	<0.1	mg/L	2/30	GRAB
	PERMIT REQUIREMENT	1.0	1.0	1.0		ONE/2 WEEKS	GRAB
Lead, Total	SAMPLE MEASUREMENT	<0.01	<0.01	<0.01	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT	0.30	0.30	0.30		ONE/2 WEEKS	24 HOUR COMPOSITE
Mercury, Total	SAMPLE MEASUREMENT	<0.01	<0.01	<0.01	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT	0.01	0.01	0.01		ONE/2 WEEKS	24 HOUR COMPOSITE
Nickel, Total	SAMPLE MEASUREMENT	<0.1	<0.1	<0.1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT	1.0	1.0	1.0		ONE/2 WEEKS	24 HOUR COMPOSITE

PLEASE CHECK ONE:

<input checked="" type="checkbox"/>	NO- No Violations
<input type="checkbox"/>	YES- I am aware that I have violated my permit, and that there are potential changes in reporting requirements and the possibility of significant penalties.
<input type="checkbox"/>	COMMENTS AND EXPLANATION OF ANY VIOLATIONS ARE ATTACHED

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations. Attached is a copy of the certified lab results.

William J. Lee/ Project Coordinator *William J. Lee*
 NAME/TITLE/SIGNATURE- PRINCIPAL EXECUTIVE OFFICER OR DESIGNEE

10/25/2011
 DATE

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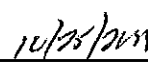
PARAMETER		QUALITY OR CONCENTRATION			UNITS	SAMPLE	SAMPLE
		MINIMUM	AVERAGE	MAXIMUM		FREQUENCY	TYPE
Phenol	SAMPLE MEASUREMENT	<1	<1	<1	mg/L	2/30	GRAB
	PERMIT REQUIREMENT		NL	NL		ONE/2 WEEKS	GRAB
Silver, Total	SAMPLE MEASUREMENT	<1	<1	<1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		NL	NL		ONE/2 WEEKS	24 HOUR COMPOSITE
Zinc, Total	SAMPLE MEASUREMENT	<0.1	<0.1	<0.1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		4.0	4.0		ONE/2 WEEKS	24 HOUR COMPOSITE
Molybdenum	SAMPLE MEASUREMENT	<1	<1	<1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		NL	NL		ONE/2 WEEKS	24 HOUR COMPOSITE
Copper, Total	SAMPLE MEASUREMENT	<0.1	<0.1	<0.1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		1.0	1.0		ONE/2 WEEKS	24 HOUR COMPOSITE
Sulfide	SAMPLE MEASUREMENT	<0.1	<0.1	<0.1	mg/L	2/30	GRAB
	PERMIT REQUIREMENT		1.0	1.0		ONE/2 WEEKS	GRAB
Flow	SAMPLE MEASUREMENT	152400	180474	203000	GPD	30/30	CONTINUOUS
	PERMIT REQUIREMENT		288000	288000		CONTINUOUS	CONTINUOUS
pH	SAMPLE MEASUREMENT	7.2	7.2	7.2	STD UNITS	2/30	GRAB
	PERMIT REQUIREMENT	6.0		11.5		ONE/2 WEEKS	GRAB

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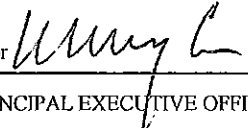
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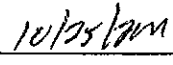
PARAMETER		QUALITY OR CONCENTRATION				SAMPLE FREQUENCY	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS		
COD	SAMPLE MEASUREMENT	30	33	37	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		1000	1000		ONE/2 WEEKS	24 HOUR COMPOSITE
BOD	SAMPLE MEASUREMENT	<10	<10	<10	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		1000	1000		ONE/2 WEEKS	24 HOUR COMPOSITE
TSS	SAMPLE MEASUREMENT	<10	<10	<10	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		750	750		ONE/2 WEEKS	24 HOUR COMPOSITE
Oil/Grease	SAMPLE MEASUREMENT	<10	<10	<10	mg/L	2/30	GRAB
	PERMIT REQUIREMENT		100	100		ONE/2 WEEKS	GRAB
PHC	SAMPLE MEASUREMENT	<5	<5	<5	mg/L	2/30	GRAB
	PERMIT REQUIREMENT		30	30		ONE/2 WEEKS	GRAB
Total Dissolved Solids (TDS)	SAMPLE MEASUREMENT	460	508	556	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		NL	NL		ONE/2 WEEKS	24 HOUR COMPOSITE
TTO	SAMPLE MEASUREMENT	<0.01	<0.01	<0.01	mg/L	2/30	GRAB
	PERMIT REQUIREMENT		5.00	5.00		ONE/2 WEEKS	GRAB

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+BNA (EPA Method 625)	SAMPLE MEASUREMENT	<1	<1	<1	mg/L	2/30	24 HOUR COMPOSITE
	PERMIT REQUIREMENT		NL	NL		ONE/2 WEEKS	24 HOUR COMPOSITE
+BTEX	SAMPLE MEASUREMENT	0.01	0.01	0.01	mg/L	2/30	GRAB
	PERMIT REQUIREMENT		1.50	1.50		ONE/2 WEEKS	GRAB
+VOC (EPA Method 624)	SAMPLE MEASUREMENT	<1	<1	<1	mg/L	2/30	GRAB
	PERMIT REQUIREMENT		NL	NL		ONE/2 WEEKS	GRAB
Gross Alpha Radioactivity	SAMPLE MEASUREMENT	2	3	4	pCi/L	4/30	GRAB
	PERMIT REQUIREMENT		15	15		WEEKLY	GRAB
Gross Beta Radioactivity	SAMPLE MEASUREMENT	<1	<1	1	pCi/L	4/30	GRAB
	PERMIT REQUIREMENT		50	50		WEEKLY	GRAB
Radium 226 + Radium 228	SAMPLE MEASUREMENT	<1	1	2	pCi/L	4/30	GRAB
	PERMIT REQUIREMENT		5	5		WEEKLY	GRAB

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