

**State of New Jersey
Office of the State Comptroller**



INVESTIGATIVE REPORT
***An Investigation into Private
Septage Deposits at the
Wrightstown Municipal Utilities
Authority***

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I. Introduction and Executive Summary

An Office of the State Comptroller (OSC) investigation has found that Thomas Harper, Chairman of the Wrightstown Municipal Utilities Authority (WMUA), and Rodman Lucas, Operations Manager of the WMUA entered into an undisclosed arrangement that provided a significant financial benefit to Lucas' private septage hauling business, Aqua Clean Toilet Systems, LLC (Aqua Clean). Under this arrangement, Lucas used his public position to improperly deposit private septage collected by Aqua Clean at the WMUA – an entity that does not otherwise accept private septage. Based on documents and testimony obtained during its investigation, OSC found that Lucas deposited over 565,000 gallons of septage at the WMUA from January 2015 through April 2018 without paying a disposal fee. This conduct provided a financial benefit to Lucas in excess of \$21,000. To date, Aqua Clean and Lucas have not paid any dumping fees to the WMUA.

OSC's investigation revealed that Chairman Harper, who is also the Mayor of Wrightstown, enabled Lucas' conduct in a manner inconsistent with his duties as Chairman of the WMUA. Without advising the other WMUA Board Members of Lucas' septage deposits, analyzing the effect that Aqua Clean's septage deposits would have on the WMUA facility, or proposing a timely public resolution authorizing the septage deposits, Chairman Harper unilaterally permitted Lucas' behavior.

As a result of this arrangement, the WMUA was compelled to accept and treat private septage that it would not have otherwise accepted. The arrangement, contrary to established best practices, risked exposing the WMUA facility to unnecessary wear and tear and potentially adverse environmental consequences.

As discussed below, Lucas' and Chairman Harper's actions are potentially unethical under state law. It is axiomatic that a local government official or employee who uses, or attempts to use, their official position to secure unwarranted privileges or advantages for themselves or others acts unethically.

Moreover, their actions should be examined in the context of the state's criminal law. Indeed, under New Jersey's criminal code, public employees who exercise their official influence over matters in which they have a conflict of interest may commit a crime when they do so with the purpose of benefiting themselves or others.

II. Methodology

OSC's investigation was initiated upon receipt of a complaint from an anonymous citizen alleging that a WMUA employee was dumping septage collected by his privately-owned company at the WMUA. In conducting this investigation, OSC obtained and examined numerous documents to include: WMUA meeting minutes and resolutions, Borough of Wrightstown ordinances, and customer invoices and septage deposit receipts from Aqua Clean. OSC also analyzed septage deposit documentation from the Township of Florence Water and Sewer Department (Florence Facility), a municipal water and sewer department at which Aqua Clean deposits a portion of its septage.

OSC conducted interviews with various WMUA and Borough of Wrightstown employees, the WMUA Board Members, a representative from the New Jersey Department of Environmental Protection (DEP), and the director of the Florence Facility. OSC also interviewed representatives from the Evesham Municipal Utilities Authority (Evesham Facility), a municipal utilities authority located in southern New Jersey.

As part of its investigation, OSC served a subpoena on Lucas compelling his appearance and testimony. During his interview, Lucas exercised his right against self-incrimination under the Fifth Amendment to the United States Constitution.

Throughout this Report, “Lucas” and “Aqua Clean” are used interchangeably to refer to Aqua Clean Toilet Systems, LLC when addressing septage deposit activities. As Lucas is the owner of Aqua Clean, any actions taken and financial benefit received by Aqua Clean can be attributed to Lucas.

OSC sent excerpts of this Report (Discussion Draft) to Lucas, Chairman Harper, the WMUA, the Florence Facility, the Evesham Facility, and the DEP to provide them with an opportunity to respond to the issues identified during this investigation. In preparing this Report, OSC considered the responses received and incorporated them herein where appropriate.

Lucas and the WMUA, in their responses, raised nearly identical objections and relied upon the same purported expert in their effort to refute OSC’s findings. Among other objections, Lucas and the WMUA generally claimed that there was no harm, financial or otherwise, to the residents of Wrightstown, the facility, or the environment in allowing Aqua Clean to deposit private septage directly into a manhole. Instead, both claimed that the WMUA financially benefited from the arrangement in that the WMUA borrowed tools and equipment from Lucas in exchange for its acceptance of Aqua Clean’s private septage deposits.

OSC’s investigative findings, as discussed fully below, contradict these assertions. However, even accepting Lucas’ and the WMUA’s claims as true, they do not alter or impact the facts supporting OSC’s overarching finding that Chairman Harper conferred a benefit onto Lucas, a government employee, that was not made available to

any other person. This was done through an arrangement that was neither publicly disclosed at the time it was made, nor properly ratified by the WMUA Board until an after-the-fact Resolution was passed following its receipt of OSC's Discussion Draft. These facts are not disputed by Lucas, Chairman Harper, or the WMUA.

III. Background Information

A. The Municipal and County Utilities Authority Law and the Wrightstown Municipal Utilities Authority

In an effort to advance the public policy of promoting the distribution of an adequate supply of water, as well as collecting, recycling, and disposing of solid waste and sewage sludge in an environmentally sound manner, New Jersey enacted the Municipal and County Utilities Authority Law (MCUAL), *N.J.S.A. 40:14B-1 et seq.*, in 1957. Under the MCUAL, "any governing body may . . . in the case of a municipality by ordinance duly adopted, create a public body . . . to acquire, construct, maintain, operate or improve works for the . . . treatment, purification, or disposal of sewage or other wastes" *N.J.S.A. 40:14B-1-4.*

In order to exercise its powers under the MCUAL, a municipal utilities authority must make a motion and pass a resolution by a majority vote of a quorum of its members. *N.J.S.A. 40:14B-14.* By extension, unilateral action on the part of an authority's chairman is not a valid means of exercising an authority's power under the MCUAL. *See id.*

The MCUAL empowers a municipal utilities authority to hire employees and determine their compensation. *N.J.S.A. 40:14B-18.* In particular, a municipal utilities authority may hire a secretary, executive director, managerial personnel, technical advisors, and professional employees. *Id.*

1. The Wrightstown Municipal Utilities Authority

By way of ordinance and pursuant to the MCUAL, the Borough of Wrightstown created the WMUA in 1975. As currently constituted, the WMUA consists of five Board Members and four employees.¹ The WMUA also retains four professionals – a solicitor, engineer, auditor, and financial advisor. The WMUA does not accept septage from private companies as part of its operation and, since Lucas commenced employment in 2012, has not adopted a resolution permitting such conduct.

The WMUA does not have by-laws or other documentation formally memorializing the Board Members’ duties. The WMUA Board Members, however, told OSC that they are responsible for oversight of the WMUA, including approving bills and capital expenditures, setting policies, and attending monthly meetings.

2. The Hiring and Compensation of Rodman Lucas as Operations Manager

The WMUA Operations Manager reports directly to the Board Members on a monthly basis and is responsible for the efficient and proper operation of the WMUA facility. It is the highest ranking employee-level position within the WMUA.

On August 27, 2012, Lucas applied for this position. As part of his compensation requirements, Lucas requested a \$70,000 annual salary, 160 hours of annual vacation/personal time, an annual cost of living raise, and “sick time, paid holidays, and health insurance as per the MUA Employees Policies.” Lucas did not request that his

¹ The WMUA Board consists of: Chairman Thomas Harper, Vice-Chairman, Laurance Lownds, Member, David Scott Timberman, Member, Ronald M. Conticelli, Jr., and Member, Tadd Kowalzyk.

private company be permitted to deposit septage at the WMUA as part of his compensation.

On October 29, 2012, Lucas was hired as the Operations Manager of the WMUA.² By resolution dated November 20, 2012, the Board of the WMUA approved and set Lucas' compensation in the form of an annual salary totaling \$68,000, 160 hours of vacation time, 96 hours of sick time, and health insurance payments. The resolution does not contain language permitting Lucas to deposit private septage at the WMUA via Aqua Clean.

IV. Investigative Findings

A. Lucas Deposits Septage Collected by his Private Business at the WMUA

OSC's investigation revealed that Lucas deposited private septage at the WMUA. According to interviews with employees from the Borough of Wrightstown and employees of the WMUA, as well as documents obtained during this investigation, OSC determined that Lucas began depositing septage collected by Aqua Clean at the WMUA between 2013 and 2015 and continued through at least April 2018. As will be explained fully below, from January 2015 through April 2018, Lucas deposited over 565,000 gallons of septage at the WMUA.

1. OSC's Investigation Revealed that Lucas Deposited Septage in a Manhole, Bypassing the WMUA Bar Screen Filter

Based on interviews with a DEP official, officials from other wastewater treatment facilities, and a WMUA employee, private septage should be (1) tested for unwanted or

² This employment represented Lucas' second tenure at the WMUA. Lucas was previously employed by the WMUA from 1994 to 2001.

harmful contaminants and chemicals, and (2) deposited through a filter so that large solids are removed from the wastewater before it is treated.³

OSC found that Lucas circumvented these steps and deposited private septage directly into a manhole located on the grounds of the WMUA, bypassing the bar screen. In fact, OSC obtained photographic evidence of Aqua Clean entering the WMUA grounds and depositing septage into a manhole.⁴ These photographs are attached as Exhibit A. An individual who worked for Aqua Clean told OSC that Lucas would deposit a full truckload - 3,500 gallons of septage - into the manhole at a time. A WMUA employee told OSC that by depositing septage in this way, Lucas avoided testing and filtering the septage collected by his private company.⁵ Moreover, through this method of depositing septage, Lucas subjected the environment to potential contamination.

When OSC questioned Lucas about this method of depositing septage, he asserted his Fifth Amendment right and declined to provide a substantive response.

Lucas' deposits of septage into the manhole increased the WMUA employees' workload, leading to a frustrated workforce. As part of their duties, WMUA employees

³ A WMUA employee informed OSC that the facility does not currently accept private septage, but did so prior to the start of Lucas' employment in 2012. The WMUA installed a bar screen station at its facility specifically for that purpose. Lucas acknowledged the importance of the bar screen station in response to OSC's Discussion Draft, stating "it was apparent the [WMUA] had intended this structure to be specifically constructed for septage truck wastes which are common in many plants to provide a service to keep the environment safe from illegal dumping."

⁴ According to a WMUA employee, Lucas was not present at the time the photographs were taken; and, the individual pictured was not a Borough of Wrightstown or WMUA employee.

⁵ The risks associated with the practice of depositing septage directly into a manhole are addressed in Section IV(C)(2)(c), *infra*.

are required to manually remove solid waste from the wastewater through a process referred to as “ragging.”⁶ The septage deposited by Lucas contained grit, oil, and grease not typical of the sewage flow entering the WMUA. These additional contaminants and Lucas’ method of depositing septage into a manhole forced WMUA employees to double their ragging activity over normal WMUA sewer deposits. According to a WMUA employee, this extra work frustrated the WMUA workforce.

In his response, Lucas concedes that he did, in fact, deposit private septage into the WMUA facility through a manhole access point. Lucas takes issue, however, with OSC’s statements regarding the possibility that “ragging” activity at the WMUA was increased as a result of those deposits. While this point is not critical to OSC’s conclusions and recommendations, we note that Lucas relies upon a limited selection of “wastewater flow” spreadsheets - only capturing data for six non-sequential months across a five-year period⁷ - as support for his position. Each of the six spreadsheets purport to show increased ragging activity during certain days in each of the reflected months. Data for the other fifty-four months was not provided. It is also worth noting that this data was not provided to OSC until Lucas reviewed his discussion draft of OSC’s report, notwithstanding the expansive requests for documentation from Lucas and the WMUA.⁸

⁶ Ragging is the process of removing “rags” (*e.g.*, disposal wipes, hygiene products, and paper, among other things) from solid waste filter screens.

⁷ April 2012, June 2013, August 2014, October 2015, December 2016, and March 2017.

⁸ On May 7, 2018, OSC submitted a formal request to WMUA for any and all documentation related to Lucas’ septage deposits. The WMUA did not produce or acknowledge the existence of the “wastewater flow” spreadsheets upon which it now relies until after it received OSC’s Discussion Draft on July 10, 2019. Despite an affirmative and ongoing obligation to produce to OSC all documents responsive to its document requests, the WMUA still has not provided spreadsheets for all of the months during which Lucas

OSC has reviewed the data and finds that this small sampling appears to demonstrate that employees of the WMUA were required to engage in more “ragging” on certain days than others during these months. Because Lucas did not keep records of his private business’ use of the WMUA facility, these spreadsheets could, in fact, support OSC’s conclusion that his personal use of the facility led to more “ragging.” In light of that and because of (1) the incomplete and inconclusive nature of the data submitted, (2) Lucas’ inability to tie his admitted conduct to the data points provided, and (3) the fact that his ultimate assertion that his conduct did not lead to additional “ragging” activity is belied by the clear and uncontroverted testimony of witnesses, OSC has concluded that this data is of no moment and does not require any modification to our final report.

2. Lucas Provided Inconsistent Explanations for Depositing Aqua Clean Septage at the WMUA

Lucas has offered conflicting rationales for depositing private septage at the WMUA. On one occasion during which he was observed depositing septage into the manhole on the WMUA grounds, Lucas claimed to a WMUA employee that he only did so because he was too sick to drive to another wastewater treatment facility at which Aqua Clean deposits septage. A Borough of Wrightstown employee corroborated this account. On another occasion, Lucas informed a subordinate employee at the WMUA that, “the powers that be said it’s ok.”

Lucas provided two separate and additional reasons for his deposit activities after he was confronted by a member of the public during a September 2017 WMUA public

deposited private septage. Similarly, Lucas’ response to OSC’s Discussion Draft appears to rely on records specifying days on which he deposited septage at the WMUA; however, in response to an OSC subpoena requesting such documentation dated May 7, 2018, Lucas asserted “as to Wrightstown, there are no documents and the number [of deposits] is unknown.”

meeting.⁹ At this meeting, Lucas claimed that (1) he can deposit private septage by virtue of his position as an “operator” and (2) he is entitled to deposit private septage in exchange for the WMUA’s use of his personal tools and equipment.¹⁰

During the September 2017 meeting, Lucas also attempted to minimize the total amount of septage Aqua Clean deposited at the WMUA by claiming that the deposits were limited to instances in which small amounts of septage remained in his truck, and were made so it would not sit overnight on his property. To be exact, Lucas admitted:

In the winter time, even in the summer, ***if I’ve got a 1000 gallons on I’ll dump it so it doesn’t sit in my yard just to get rid of it***, because it goes rotten, anaerobic. So instead of me going where else I dump, which I don’t have to tell you where else I dump. So that’s the thing. So I do bring it up here.

(emphasis added).

OSC’s investigation, however, revealed that Aqua Clean deposited over 565,000 gallons of septage at the WMUA from January 2015 through April 2018, which, according to the individual that worked for Aqua Clean, included full truckloads.

⁹ The WMUA holds public meetings on a monthly basis to discuss the business and operations of the entity. It is customary for the Board Members, professionals, and certain employees, such as the Operations Manager and Treasurer, to attend these meetings.

¹⁰ The September 2017 WMUA Monthly Meeting will be discussed in detail in Section IV(B)(4), *infra*.

B. There Was No Resolution or Formal and Open Agreement Permitting Aqua Clean to Deposit Septage at the WMUA

1. OSC's Investigation Revealed That the WMUA Did Not Pass a Resolution Permitting Private Septage Deposits

Pursuant to the MCUAL, the WMUA was required to pass a resolution in order for it to either accept private septage at its facility or permit one of its employees to deposit private septage there. *N.J.S.A. 40:14B-14*. OSC found that the WMUA did not comply with this requirement, even after the entire Board learned of Lucas' private septage deposits at the September 2017 meeting. During the course of OSC's investigation, the WMUA did not produce any documentation or resolutions authorizing the WMUA to accept private septage. Similarly, there was no resolution permitting Lucas to deposit private septage at the WMUA.

OSC notes, however, that only after the WMUA received, reviewed, and responded to OSC's Discussion Draft did it attempt to cure this deficiency. Specifically, on August 21, 2019, the WMUA held a special meeting and – with Vice-Chairman Lownds absent and Chairman Harper abstaining – voted to pass a resolution retroactively approving the arrangement.

2. Chairman Harper Unilaterally Permitted Lucas to Deposit Septage, and Claimed that the Arrangement Benefitted the WMUA

OSC found that Chairman Harper, without consulting or informing the other WMUA Board Members, unilaterally permitted Lucas, via Aqua Clean, to deposit private septage at the WMUA. During a sworn interview, Chairman Harper told OSC that he authorized Lucas to deposit private septage at the WMUA, and that he did so without

involving anyone else in the discussions. Chairman Harper confirmed that the arrangement was not memorialized because he “didn’t think it was important.”

Both Chairman Harper and Lucas claimed that Lucas was permitted to deposit private septage at the WMUA facility in exchange for use of his personal tools and equipment, an arrangement Chairman Harper claims provided monetary savings to the WMUA. OSC found, however, that the WMUA failed to take any steps to ensure that the arrangement provided savings to the facility and the people of Wrightstown. The WMUA never solicited comparable competing bids or estimates from other entities to confirm the cost of the tools and equipment. Moreover, contrary to their respective statements, which will be discussed fully below, neither Lucas nor Harper maintained records of the septage deposited by Aqua Clean to confirm that the cost of the total septage deposited, including any potential wear and tear to the facility, was offset by any so-called benefit to the WMUA.

In response to OSC’s Discussion Draft, Lucas claimed that the WMUA would have incurred fees totaling \$61,400 if it rented equipment comparable to what Lucas used from his personal collection. One piece of equipment, a backhoe, comprises \$57,600, or 94 percent, of that figure.

Although Lucas provided an itemized accounting of rental costs for his equipment, he failed to provide any supporting documentation to justify the costs he attributes to the equipment. Moreover, he failed to provide documentation confirming dates on which the equipment was used or corroborating the types of equipment used.¹¹ The WMUA likewise does not possess any documentation to support Lucas’ figures.

¹¹ Lucas’ calculation for use of the backhoe is misleading for two reasons. First, Lucas claims the WMUA’s use of his backhoe saved the WMUA \$57,600 in rental costs. He

3. Chairman Harper Did Not Apprise the WMUA Board Members of the Arrangement Prior to September 2017

Although Chairman Harper believed that he subsequently told the WMUA Board Members of the septage deposit arrangement, each WMUA Board Member contradicted Chairman Harper by testifying under oath that they did not know of the arrangement until it was made public during a September 2017 WMUA meeting, at the earliest. Mr. Timberman testified that “[Lucas’ conduct] was mentioned at a meeting. That was my first knowledge of it.” Similarly, Mr. Lownds acknowledged that he first learned of Lucas’ actions “when the complainant appeared at a board meeting.” Likewise, when asked if he first learned of Lucas’ actions during the September 2017 meeting, Mr. Conticelli responded “[t]hat is correct.” Even though Mr. Kowalzyk was present during the September 2017 meeting, he claimed that he only became aware of the arrangement in the fall of 2018.

4. The September 2017 WMUA Monthly Meeting

Lucas’ conduct and the existence of the arrangement were addressed at a WMUA public meeting for the first time in September 2017. At this meeting, an employee with the Borough of Wrightstown, Timothy Harper,¹² inquired as to whether the WMUA

arrives at this number by multiplying a monthly rental cost of \$3,200 (a rental rate unsupported by any evidence) by 18 consecutive months of daily use. However, Lucas admitted that the WMUA used the backhoe only “whenever needed,” as opposed to daily for 18 consecutive months. Second, documents submitted by the WMUA in May of 2018 reveal that in October of 2014, the WMUA paid Aqua Clean \$30,000 in an apparent purchase of the backhoe. Lucas omitted the existence of this exchange from his calculations.

¹² Mr. Harper is the brother of the Mayor of Wrightstown and WMUA Board Chairman, Thomas Harper.

accepted “outside septic.” Mr. Harper told OSC that he felt compelled to publicly address Aqua Clean’s deposits because a number of Wrightstown residents raised concerns to him. In response to Mr. Harper’s question, Lucas acknowledged that the WMUA does not accept private septage, but claimed he is permitted to deposit septage by virtue of his position as “an operator” at the WMUA. Lucas attempted to justify his actions by explaining that the WMUA utilized his private equipment without charge. In addition, Lucas claimed that he only deposited private residential septage at the WMUA facility.¹³

After this initial exchange, Lucas attempted to downplay this matter of public concern:

Conticelli: What’s going on here, what’s the problem?

Lucas: Apparently he’s got a chip on his shoulder.

Tim Harper: What’s happening is residents are coming to me and they see his truck.

Lucas: Who knows that I have that truck? What residents in town know I have that truck?

Mr. Conticelli and Chairman Harper then tried to terminate any further discussion:

Conticelli: I don’t like questions third party (sic). If somebody needs to speak from the town then they should come here.

Tim Harper: I’ve actually seen it.

Conticelli: ***I don’t care what you saw.*** I’m saying if you’re speaking for somebody else, they should be here. I don’t want to hear anybody else.

Tim Harper: I’m just saying if the septic keeps dumping.

¹³ Documents provided by Aqua Clean show that Lucas’ deposits were not limited to private residential septage. On various occasions, Lucas deposited liquid grease obtained from an area restaurant into the WMUA facility.

Lucas: Listen, it's not a secret. I'm not going to sneak in the middle of the night and dump it off so nobody sees me. Tom knows I dump it off. Judy's seen the truck up there that I've dumped off. I got a guy that drives for me that dumps it there. And it's, my truck hold 3500 gallons of septic that's what it holds, ok . . . I have nothing to hide. I write it in the book.

Conticelli: Are you aware of this? (Referring to the Chairman)

Chairman: ***Yes, I gave him permission.***

Conticelli: End of discussion.

(emphasis added).

Chairman Harper's statement above represented the first time he publicly acknowledged the existence of the septage deposit arrangement.

Despite Conticelli's demand that the discussion end, the Board Secretary and Treasurer, Judy Harrington, continued the conversation and requested records of Lucas' deposits. Both Lucas and Chairman Harper claimed Lucas maintains documents that could be made readily accessible:

Harrington: Tom, as the keeper of the books, there really should be records kept.

Chairman: There is.

Lucas: I do write it in Judy, in the log book.

Chairman: It's realistic; it's down there.

Lucas: I can write a list and give it to you if you want, if that helps out.

* * *

Harrington: But if somebody asked me that question, I have no proof. I have no records. It looks like you're doing it in the dark of the night because I don't have any records.

Lucas: I'll give them to you.

Despite his public comments, Lucas later admitted to OSC that these records do not exist. *See also* Sections IV(D)(1), (E).

Further, although Lucas claimed in his response to OSC's Discussion Draft that the WMUA Board "ratified this bartering arrangement on the record" during this meeting, OSC found no support for this claim. In fact, as previously noted, it was not until after the WMUA received and responded to OSC's Discussion Draft that it held a special meeting in an attempt to retroactively approve the arrangement.

C. The Actions of Lucas and the WMUA Were Contrary to DEP Requirements and Industry Best Practices

To understand best practices in the septage disposal industry, OSC interviewed the DEP Section Chief from the Bureau of Pretreatment and Residuals, Division of Water Quality. OSC also interviewed representatives from two wastewater treatment facilities: the Florence Facility and the Evesham Facility.¹⁴ These individuals explained the reporting requirements with which a wastewater treatment facility must comply as well as best practices for operating a wastewater treatment facility. As will be discussed below, the WMUA and Lucas engaged in actions that run contrary to these reporting requirements and best practices in the industry.

1. DEP Reporting Requirements

OSC found that the WMUA and Lucas failed to comply with DEP reporting requirements. The DEP Representative advised OSC that when a wastewater facility accepts and processes private septage, the facility must inform the DEP of the total

¹⁴ As discussed in Section IV(D)(1), *infra*, Lucas admitted that he deposits private septage at only two locations: the WMUA and the Florence Facility.

septage deposited by way of the facility's monthly "Residual Transfers Report" (RTR). An RTR, which is submitted monthly by wastewater facilities that handle specific waste products, such as septage, documents the receipt and transfer of those waste products.

The DEP Representative confirmed that the WMUA did not report the septage deposited by Lucas, and that the RTRs submitted by the WMUA did not list any septage deposits. Indeed, the DEP Representative told OSC he was unaware that the WMUA was accepting and processing any private septage.¹⁵

The DEP Representative provided OSC with sample RTRs from the WMUA and the Florence Facility. The RTR from the Florence Facility acknowledges that private septage was deposited at the facility and identifies the amount of septage deposited during the monthly reporting period. By way of contrast, the RTR from the WMUA omits any reference to the septage deposited by Lucas. These reports are attached as Exhibit B.

OSC questioned Lucas about the WMUA RTRs. In response, he asserted his Fifth Amendment right and declined to answer.

2. Industry Best Practices

According to the representatives interviewed by the OSC, industry best practices concern: (1) the process a sewage treatment facility should follow before accepting private septage, (2) records retention, and (3) the location in which the deposits are made. These best practices will be addressed separately below.

¹⁵ The DEP Representative noted that he never encountered a situation in which a facility operator used his official position to deposit his private company's septage without a fee at the facility he operates.

a. The Process for Accepting Private Septage

The DEP and Facility Representatives told OSC that before a facility begins accepting private septage, it should (1) analyze the amount of septage it can accept, if any, (2) determine whether such action would benefit the customers of the facility (*i.e.*, residents), (3) present its findings to the governing board or council, and (4) await formal approval by the board or governing body. The DEP Representative further explained that a facility should exercise caution in accepting private septage because a facility's ability to effectively remove pollutants may be adversely affected by a large influx in septage.

OSC found that the WMUA, through the acts and omissions of Lucas and Chairman Harper, did not conform to these best practices. In response to OSC's request for all documentation related to the deposit of private septage, the WMUA did not produce any documentation: (1) detailing the amount of septage the facility can accept, (2) examining whether accepting septage would be beneficial to its customers, or (3) citing any formal resolution permitting the WMUA to accept septage or granting Lucas permission to deposit septage. Further, upon being interviewed by OSC, the WMUA Board Members testified that they were not aware of the septage deposits until the fall of 2017, over two years after Lucas began making such deposits.¹⁶ As such, the WMUA could not verify that either Lucas or Chairman Harper conformed to industry best practices in permitting Lucas to deposit septage at the WMUA.

¹⁶ OSC's review of the WMUA monthly meeting transcripts revealed that the WMUA Board did not discuss the septage deposit arrangement prior to September 2017.

b. Retaining Records of Septage Deposits

Best practices require a facility to retain comprehensive records identifying the number of septage deposits made, the amount of each deposit, and the source of the deposited septage. In fact, DEP recommends to facilities that they maintain detailed records of septage deposits. As the DEP Representative explained to OSC, detailed record keeping allows a facility to pinpoint the source of any septage that creates an issue at a facility, such as the presence of unwanted contaminants.¹⁷

OSC found that the WMUA and Lucas did not maintain any records of the septage deposited by Lucas. In response to OSC's request for WMUA records regarding Lucas' septage deposits, the WMUA asserted that it does not possess any such records. Likewise, Lucas confirmed that "[a]s to Wrightstown, there are no documents [of septage deposits] and the number [of deposits] is unknown."¹⁸ Their failure to maintain these records deviates from accepted industry best practices.

¹⁷ In their respective responses to OSC's Discussion Draft, the WMUA and Lucas acknowledged that a wastewater facility should require private septage haulers to identify the type of septage acquired, the date and time on which the septage was acquired, and the quantity to be deposited in order to "safeguard the [facility] operations" They agreed that Lucas should have provided this information to the WMUA and maintained corresponding documentation. To date, OSC has not received any such documentation from Lucas or the WMUA.

¹⁸ Despite Lucas' statement to OSC that no documents exist, his purported expert claims that Lucas provided him with "records that reflected days and amounts dumped at the [WMUA] plant." These records were not, however, attached to the expert's report. To date, these records have not been provided to OSC.

It is also worthy of mention that Lucas' failure to maintain such records contradicts the public statements he and Chairman Harper made at the September 2017 WMUA monthly meeting, where each professed such documents exist and could be produced.¹⁹

In response to questioning about his records retention practices and public statements concerning same, Lucas raised his Fifth Amendment right.

c. Risks of Depositing Septage into an Unfiltered Manhole

OSC found that Lucas also disregarded industry standards and the dangers associated with depositing septage into a manhole. The DEP and Facility Representatives interviewed by OSC strongly cautioned against depositing septage directly into a manhole that is not connected to a filter. They warned that if septage is deposited into a manhole, it may bypass a stage of filtering at which "rags" are removed from the wastewater. If "rags" bypass the filter, the pumps and other machinery at a facility may malfunction. In addition, the DEP Representative warned that deposits made in a manhole may "cause problems with conveyance capacity and/or gas and odor generation, leading to potential environmental concerns."

Lucas' own public statements suggest he is aware that it is improper to deposit private septage directly into a manhole. In a July 2013 WMUA public meeting, Lucas requested that the Board Members "let him know ASAP if they see a septic hauler . . . in town" because "they noticed at the plant that someone dumped septage into a manhole." Thus, by his own words, it appears Lucas understood and appreciated the improper nature of the conduct in which he subsequently engaged.

¹⁹ See Section IV(B)(4), *supra*, for Lucas' public statements.

D. OSC's Investigation Revealed that Lucas, through Aqua Clean, Deposited Over 565,000 Gallons of Septage at the WMUA from January 2015 through April 2018

1. Calculating the Total Septage Deposited by Aqua Clean at the WMUA and the Financial Benefit Lucas Received

According to Lucas, Aqua Clean deposited septage at only two locations, the WMUA and the Florence Facility. Although Lucas did not provide any documentation detailing his septage disposal activities at the WMUA, OSC was able to approximate the total septage he deposited at the WMUA from January 2015 to April 2018 through an analysis of Aqua Clean's customer invoices and the Florence Facility's internal documentation.²⁰ According to these documents, Aqua Clean obtained and deposited approximately 848,000 gallons of septage from January 2015 to April 2018. Of that amount, Aqua Clean deposited approximately 283,000 gallons at the Florence Facility. By subtracting the amount of septage that Aqua Clean deposited at the Florence Facility from the total septage it obtained and deposited, OSC determined that Aqua Clean dumped approximately 565,000 gallons of septage at the WMUA. Neither Lucas nor the WMUA disputed these figures.

Applying the Florence Facility's septage disposal rate of \$0.0375 per gallon for the deposit of private septage at the WMUA, OSC found that from January 2015 through April 2018, Lucas avoided paying at least \$21,000 in disposal fees, thereby depriving the

²⁰ In conducting its analysis, OSC resolved any numerical discrepancies in favor of Lucas.

WMUA of a payment in that amount and exposing it to potentially adverse consequences.²¹

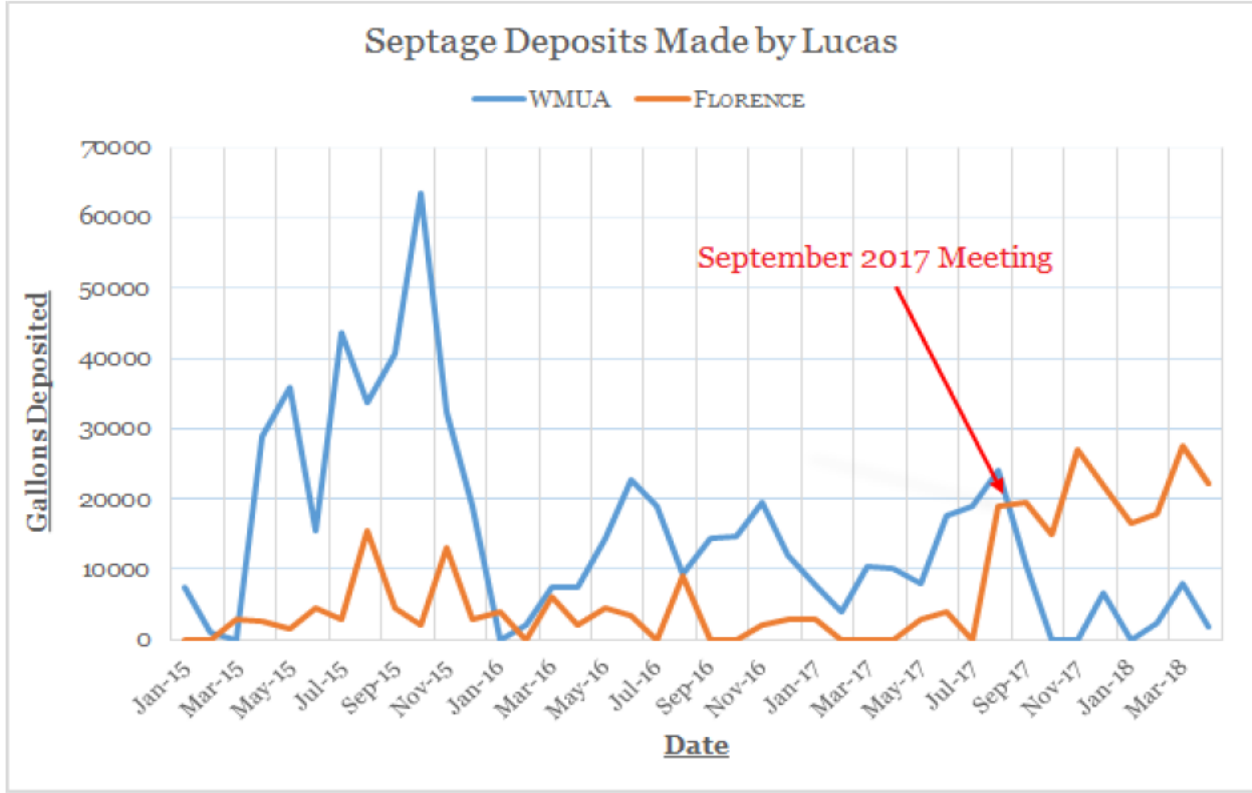
2. OSC's Investigation Uncovered a Significant Change in Lucas' Septage Deposits Following the September 2017 WMUA Public Meeting

Based on the documentation provided by Lucas, OSC determined that Aqua Clean deposited septage at the WMUA at an approximate average of 27,358 gallons per month in 2015, 11,929 gallons per month in 2016, and 9,897 gallons per month between January and September 2017. After the issue of private septage deposits was first publicly raised at the September 2017 meeting, Aqua Clean's deposits at the WMUA decreased considerably – to 2,233 gallons of septage per month from October through December 2017 and 3,050 gallons per month from January through April 2018.

By way of comparison, OSC found that Aqua Clean's deposits at Florence reveal an inverse correlation during that same time period. Aqua Clean deposited 4,375 gallons of septage per month at Florence in 2015, 2,833 gallons per month in 2016, and 5,389 gallons per month from January through September 2017. Following the September 2017 WMUA public meeting, Aqua Clean's deposits at Florence averaged 21,300 gallons per month between October and December 2017 and 21,100 gallons per month from January through April 2018. In other words, Aqua Clean's deposits at the WMUA drastically decreased as deposits at Florence dramatically increased after the September 2017 WMUA meeting. Figure 1 below illustrates this change in behavior.

²¹ The Director of Florence advised that his facility charges slightly less than the market rate to deposit septage.

Figure 1



3. Aqua Clean’s Septage Deposits at the WMUA Were Not Limited to Private Residential Septage

OSC’s analysis of the documentation submitted by Aqua Clean revealed that it deposited septage from both private residences and commercial establishments. Contrary to Lucas’ statements during the September 2017 meeting, Aqua Clean’s deposits at the WMUA were not limited to private residential septage. While the majority of the septage obtained by Aqua Clean originated from private residences, a number of the deposits also contained grease from an area restaurant, which as noted in Section IV(A)(1), created additional work for the WMUA staff. Invoices showing that Aqua Clean deposited grease at the WMUA are attached as Exhibit C.

E. OSC Found That Chairman Harper Could Not Support Statements He Made to Members of the Public

OSC found that Chairman Harper could not support his claim that the arrangement provided monetary savings to the WMUA. First, the WMUA did not provide any evidence that it conducted an analysis in connection with Aqua Clean's deposits to determine the amount of private septage it could handle before compromising the operation of the facility. Second, even if the WMUA conducted such an analysis, it never solicited comparable competing bids or estimates from other entities to ensure that the potential strain placed on the facility by Lucas' method of depositing septage and the waiver of any deposit fees was ultimately less costly than renting or purchasing any equipment the WMUA required.

OSC also found that Chairman Harper could not verify his claim that Aqua Clean, through Lucas, documented the septage it deposited at the WMUA facility. Chairman Harper publicly asserted that documentation memorializing the amount of Aqua Clean's septage deposits at the WMUA exists. Chairman Harper maintained this position during an interview with OSC:

Q: Did you take any steps to ensure that Mr. Lucas was keeping records?

A: Yes.

Q: What steps did you take?

A: I looked at them every so often.

Q: You looked at the records?

A: Yes.

When OSC informed him that the WMUA did not produce any septage deposit records and Aqua Clean admitted they do not exist, Chairman Harper remained committed to his narrative:

Q: I'm going to represent to you that records of [Lucas'] dumping weren't produced and we were told that they don't exist.

A: Well, they do exist and [Lucas] has them.

Q: So [Lucas] has the records?

A: I think he does.

Q: Do you know where the records are kept?

A: They were in the office at the time, the [W]MUA office.

Q: Okay. Would that be [Lucas'] personal office at the WMUA?

A: Yes.

Q: Is that where you actually saw the records?

A: Yes.

While Chairman Harper claimed not only that the records exist, but that he “looked at them every so often,” the WMUA was unable to locate and provide any such documentation. Further, as noted above, Lucas admitted this documentation does not exist.

F. Lucas and Chairman Harper Acted Contrary to their Positions of Public Trust

The public's confidence in the integrity of public officers and employees is of paramount importance. Any conflict – whether real or perceived – between the private interests and public duties of a government officer or employee imperils the public's confidence in the operation of government.

Through Lucas' actions – including depositing septage into a manhole and failing to maintain documentation of the deposits – he placed Aqua Clean and its profits ahead of the WMUA facility he is tasked with managing, the people of Wrightstown, and the environment. Likewise, Chairman Harper used his official position to sanction behavior

that benefited Lucas to the detriment of the facility he was charged with overseeing and the people he represents as Mayor of Wrightstown.

It is also worth noting that Chairman Harper denies the WMUA was obligated to follow the formal Motion and Resolution process in order to enter into the septage deposit arrangement he had with Lucas, claiming that the Board Members provided him with the implicit authority to do so. Chairman Harper's assertion is directly contradicted by the plain language of the MCUAL, *N.J.S.A. 40:14B-14*; and, it undermines the principle that public officials and employees should act with transparency.

V. Recommendations and Referrals

Based on the facts uncovered during its investigation, OSC makes the following recommendations and referrals.

A. Recommendations

OSC's recommendations aim to ensure that the public's confidence in public officers and employees is maintained and that the principles incorporated in the LGEL are furthered.

To that end, OSC makes the following recommendations:

1. The Wrightstown Municipal Utilities Authority should immediately cease and desist accepting septage from Aqua Clean Toilet Systems, LLC, until it analyzes the amount of septage the facility can accept, determines whether such action would benefit its customers (*i.e.*, the residents of Wrightstown), presents its findings to the governing board, and receives approval from the governing board by way of resolution.
2. The motion and resolution process set forth in the MCUAL promotes transparency in the operations of a municipal or county utilities authority. Before exercising its powers under the MCUAL, including the power to accept private septage, the boards of these authorities, including the WMUA, must make a public motion and pass a public resolution.

3. In keeping with established industry best practices, if a wastewater treatment facility, including the WMUA, wishes to modify its operations, it should document how the proposed modification would affect the facility, analyze whether the modification will benefit the residents it services, fully inform all board members of the proposed modification, alert the DEP of the proposed modification, and finalize the modification by way of resolution at a public meeting.
4. The Legislature should consider whether or not an increase in the monetary sanctions for violations of the LGEL is warranted. A \$500 penalty may be insufficient to provide adequate deterrence to prevent a local government official or employee from acting in a manner that violates the LGEL.

B. Referrals

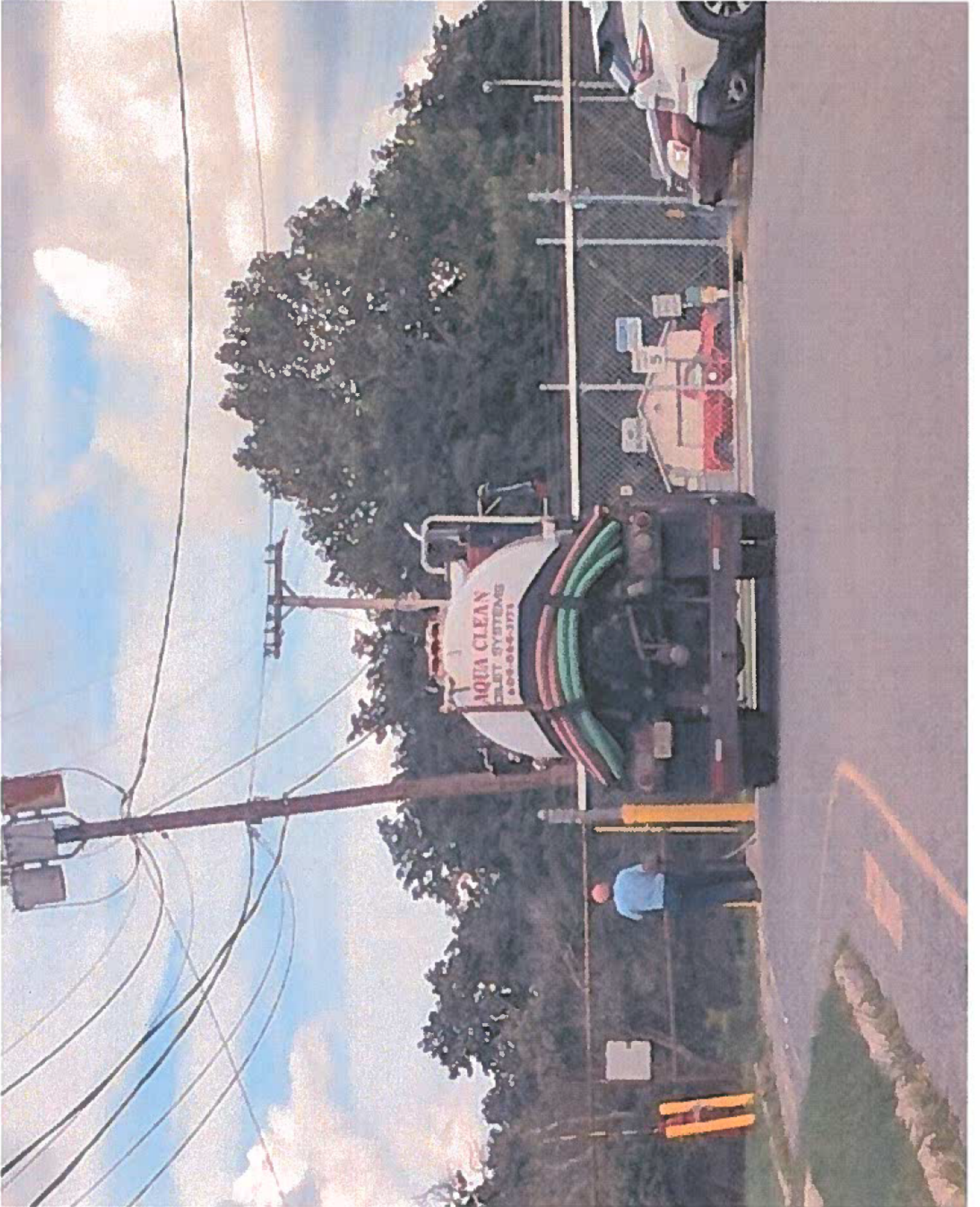
The information obtained by OSC during this investigation indicates that Lucas and Chairman Harper may have engaged in actions that constitute “official misconduct” under *N.J.S.A. 2C:30-2*. A public servant commits the crime of official misconduct when, “with purpose to obtain a benefit for himself or another” the public servant “commits an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or he is committing such act in an unauthorized manner.” In light of the facts revealed during its investigation, OSC is referring this matter to the Division of Criminal Justice to determine whether prosecution is appropriate.

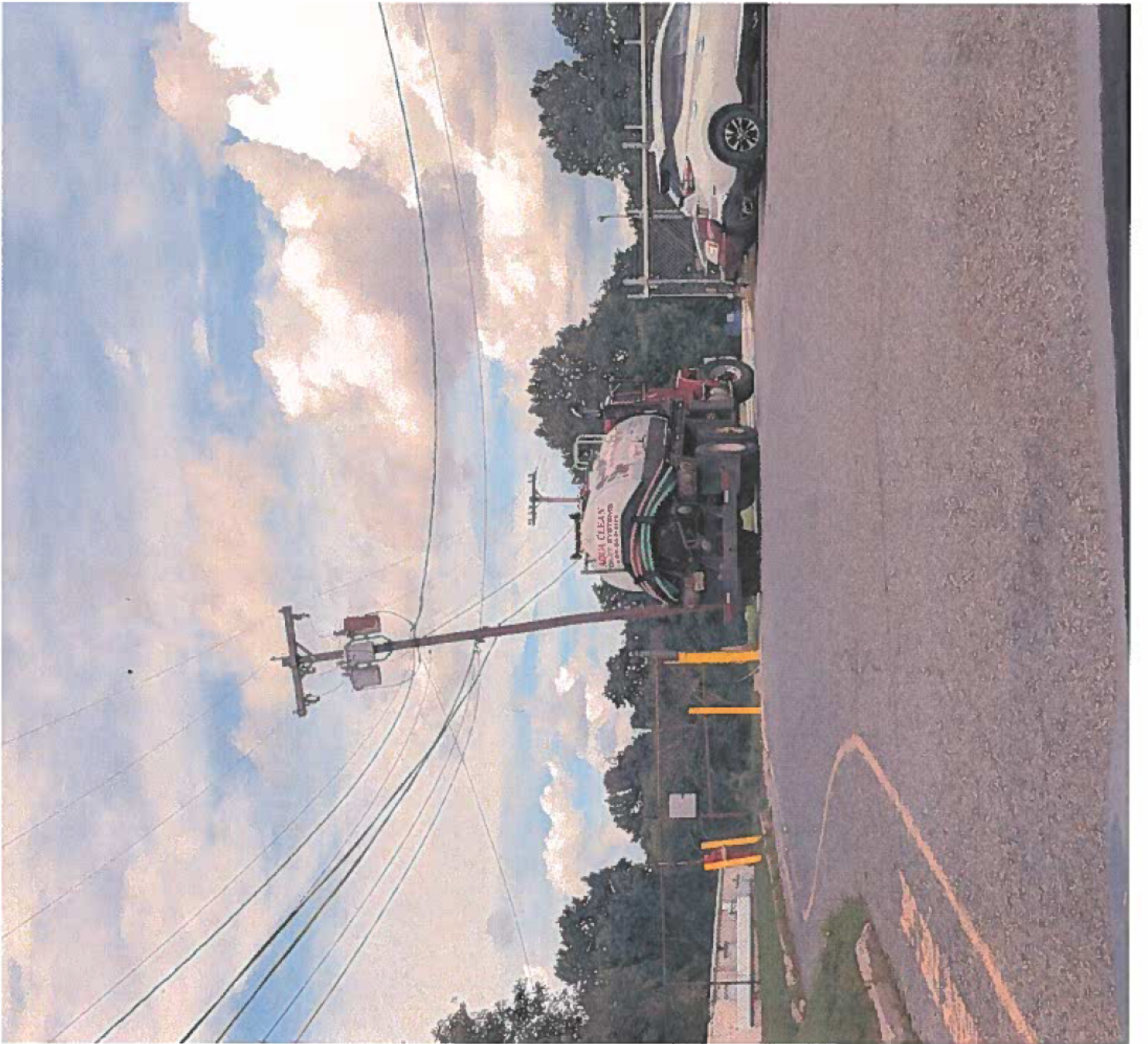
In addition, Lucas and Chairman Harper may have engaged in acts that violate the LGEL. The LGEL prohibits local government employees from using “their official position to secure unwarranted privileges or advantages for themselves or others.” *N.J.S.A. 40A:9-22.5(c)*. The statute also forbids public employees from acting “in [their] official capacity in any matter where [they] . . . [have] a direct or indirect financial . . . involvement that might reasonably be expected to impair [their] objectivity or

independence of judgment.” *N.J.S.A. 40A:9-22.5(d)*. This matter will be referred to the Local Finance Board within the Department of Community Affairs, Division of Local Government Services to determine whether Lucas and Chairman Harper engaged in acts and omissions that constitute violations of the LGEL.

This matter will also be referred to the Department of Environmental Protection to determine whether Lucas’ or the WMUA’s actions constitute violations of the State’s environmental statutes, rules, and regulations.

EXHIBIT A





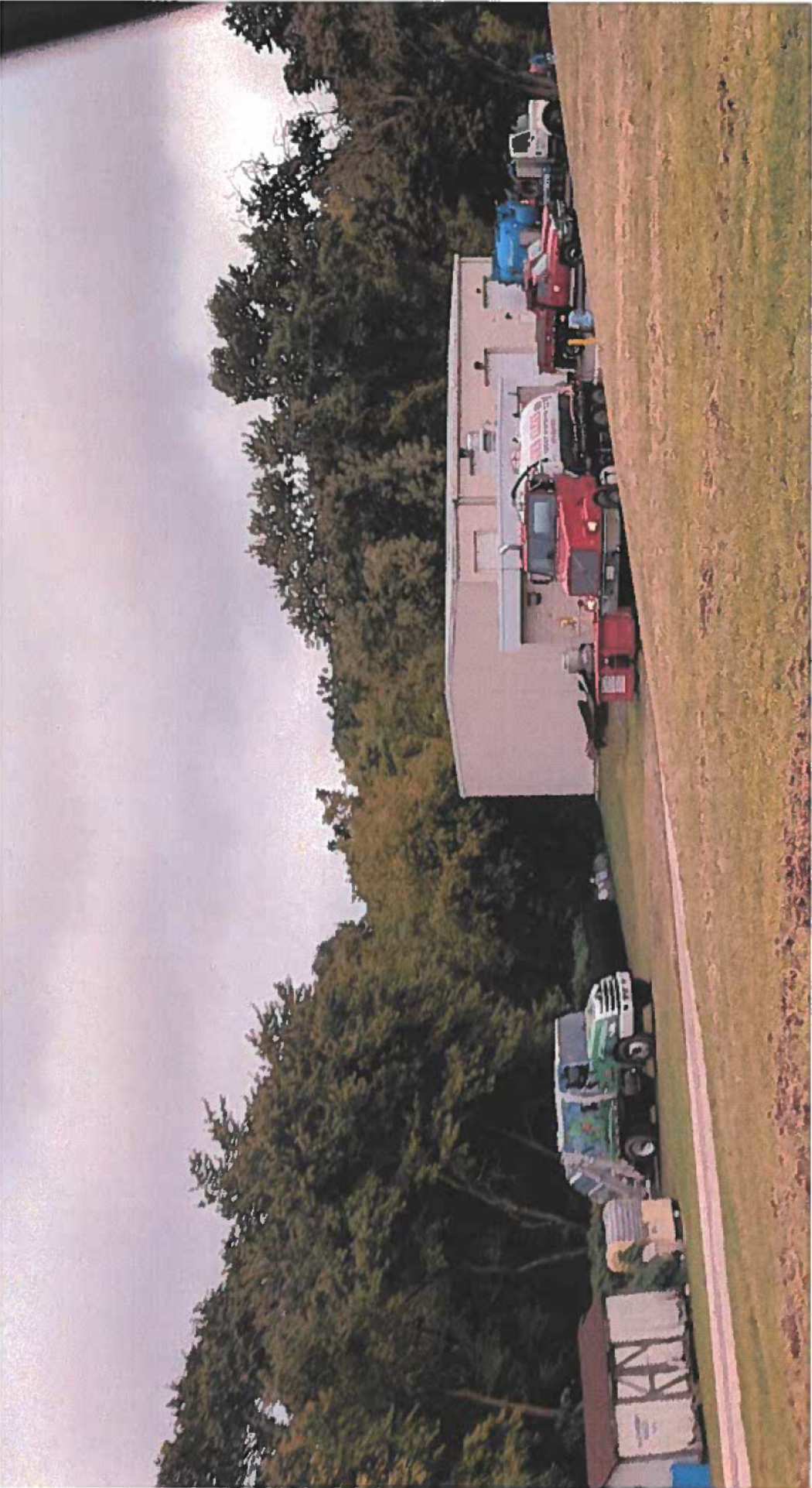




EXHIBIT B

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 1/1/15 TO 1/31/15 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 1/30/15

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	20,285	GALLONS		1/30/15

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: MONITORED LOCATION: MONITORING PERIOD: FACILITY NAME: POSTMARKED DATE:
NJG0211711 SL2A SQAR- Sludge Sto... 2/1/15 TO 2/28/15 WRIGHTSTOWN BOROUGH STP 4/1/15

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	20,360	GALLONS		4/1/15

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 4/1/15 TO 4/30/15 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/17/15

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	14,688	GALLONS		9/17/15

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 5/1/15 TO 5/31/15 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/17/15

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	30,931	GALLONS		9/17/15

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 6/1/15 TO 6/30/15 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/17/15

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,990	GALLONS		9/17/15

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 7/1/15 TO 7/31/15 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/17/15

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	32,050	GALLONS		9/17/15

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: MONITORED LOCATION: MONITORING PERIOD: FACILITY NAME: POSTMARKED DATE:
NJG0211711 SL2A SQAR- Sludge Sto... 8/1/15 TO 8/31/15 WRIGHTSTOWN BOROUGH STP 9/17/15

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	48,013	GALLONS		9/17/15

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 11/1/15 TO 11/30/15 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 1/20/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,097	GALLONS		1/20/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: MONITORED LOCATION: MONITORING PERIOD: FACILITY NAME: POSTMARKED DATE:
NJG0211711 SL2A SQAR- Sludge Sto... 12/1/15 TO 12/31/15 WRIGHTSTOWN BOROUGH STP 1/20/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,157	GALLONS		1/20/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 1/1/16 TO 1/31/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 2/16/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,930	GALLONS		2/16/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 2/1/16 TO 2/29/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 3/3/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	46,746	GALLONS		3/3/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 3/1/15 TO 3/31/15 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 4/14/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	25,895	GALLONS		4/14/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 4/1/16 TO 4/30/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/16/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	32,665	GALLONS		9/16/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 5/1/16 TO 5/31/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/16/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	16,060	GALLONS		9/16/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 5/1/16 TO 5/31/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/16/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	16,060	GALLONS		9/16/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 6/1/16 TO 6/30/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/16/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	30,830	GALLONS		9/16/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI47101

PERMIT NUMBER: NJG0211711 **MONITORED LOCATION:** SL2A SQAR- Sludge Sto... **MONITORING PERIOD:** 7/1/16 TO 7/31/16 **FACILITY NAME:** WRIGHTSTOWN BOROUGH STP **POSTMARKED DATE:** 9/16/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	30,687	GALLONS		9/16/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 9/1/16 TO 9/30/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 1/11/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,245	GALLONS		1/11/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 11/1/16 TO 11/30/16 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 12/1/16

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,245	GALLONS		12/1/16

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 1/1/17 TO 1/31/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 2/14/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,135	GALLONS		2/14/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 3/1/17 TO 3/31/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 4/19/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	13,900	GALLONS		4/19/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: MONITORED LOCATION: MONITORING PERIOD: FACILITY NAME: POSTMARKED DATE:
NJG0211711 SL2A SQAR- Sludge Sto... 4/1/17 TO 4/30/17 WRIGHTSTOWN BOROUGH STP 5/19/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCOR	31,055	GALLONS		5/19/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 5/1/17 TO 5/31/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 6/19/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	46,740	GALLONS		6/19/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 6/1/17 TO 6/30/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 7/25/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	25,050	GALLONS		7/25/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 7/1/17 TO 7/31/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 8/24/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	15,000	GALLONS		8/24/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 8/1/17 TO 8/31/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 9/25/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	78,435	GALLONS		9/25/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 9/1/17 TO 9/30/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 10/24/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	84,355	GALLONS		10/24/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 11/1/17 TO 11/30/17 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 12/20/17

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	46,160	GALLONS		12/20/17

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: MONITORED LOCATION: MONITORING PERIOD: FACILITY NAME: POSTMARKED DATE:
NJG0211711 SL2A SQAR- Sludge Sto... 1/1/18 TO 1/31/18 WRIGHTSTOWN BOROUGH STP 3/20/18

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	47,620	GALLONS		3/20/18

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: MONITORED LOCATION: MONITORING PERIOD: FACILITY NAME: POSTMARKED DATE:
NJG0211711 SL2A SQAR- Sludge Sto... 2/1/18 TO 2/28/18 WRIGHTSTOWN BOROUGH STP 3/20/18

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	31,160	GALLONS		3/20/18

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 3/1/18 TO 3/31/18 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 4/25/18

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	16,230	GALLONS		4/25/18

Residuals Transfer Report (UNOFFICIAL COPY)

PI 47101

PERMIT NUMBER: NJG0211711 MONITORED LOCATION: SL2A SQAR- Sludge Sto... MONITORING PERIOD: 4/1/18 TO 4/30/18 FACILITY NAME: WRIGHTSTOWN BOROUGH STP POSTMARKED DATE: 6/11/18

#	SENT TO	REC'D FROM	FACILITY ID NUMBER	AMOUNT TRANSFERRED		MONITORED LOCATION	POSTMARKED DATE
				QUANTITY	UNITS		
1	X		DELCORA	31,140	GALLONS		6/11/18

EXHIBIT C

INVOICE

Aqua Clean Toilet Systems, LLC.
118 Magnolia Road
Pemberton, NJ 08068
Phone: 609-864-3175
Fax: 609-283-0216

INVOICE # A-2015-06
DATE: 03/03/2015

BILL TO:

[REDACTED]
[REDACTED]
[REDACTED]

LOCATION:

[REDACTED] Restaurant
[REDACTED]
[REDACTED]

Feb. 2015

Description of Charges:

Cleaning out of grease tank-1,100 gallons

Subtotal: \$340.00

7% Sales Tax: +23.80

Total Due: \$363.80

Amount Received: \$

Please make checks payable to:

Aqua Clean Toilet Systems

Thank you for choosing us. We appreciate your business!

INVOICE

Aqua Clean Toilet Systems, LLC.
118 Magnolia Road
Pemberton, NJ 08068
Phone: 609-864-3175
Fax: 609-283-0216

INVOICE # A-2015-57
DATE: 08/24/2015

BILL TO:

[REDACTED] Bar & Grill
[REDACTED]
[REDACTED]

DATE(S)/LOCATION:

8/12
/Same as Bill To

Description of Charges:

Grease Trap clean out-1,500 gallons

Subtotal: \$375.00

7% Sales Tax: +26.25

Total Due: \$401.25

Amount Received: \$

Please make checks payable to:

Aqua Clean Toilet Systems

Thank you for choosing us. We appreciate your business!

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