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MEMORANDUM

TO: LCA Board of Directors; Municipal Sewer Signatories
FROM: Liesel Gross, CEO
DATE: November 11, 2016
RE: Meeting Recap: Allentown Public Meeting – USEPA Administrative Order Update

On Wednesday night, the City of Allentown held a public meeting to review their plans and options to respond to the USEPA Administrative Order (AO) to eliminate sanitary sewer overflows (SSOs). The City only presented topics related to improvements at the Kline's Island Wastewater Treatment Plant (KIWWTP), and did not discuss any efforts by either the City or its signatories (including LCA) to remove leakage, infiltration and inflow, from the sewer system.

Dan Koplisch, a special consultant to the City, and Tim Bradley, engineering consulting from Kleinfelder, presented on behalf of the City. The primary focus of the presentation was on the potential use of blending technology at the KIWWTP to treat the wet-weather flows and comply with permit requirements and the AO. A copy of their presentation is attached to this memo for your review.

This memo is intended to summarize the comments and questions that were offered during the meeting. In general, the City did a good job of explaining the issues in an understandable way. Four LCA Board members attended along with several staff members. Twelve people made comments or asked questions during the meeting, including one City Council member.

The public comments and questions generally fell within the following overarching themes:

Impact on Treatment Capacity & Growth – If the City implements blending (or adds additional storage for that matter), does this result in having more treatment capacity available that will, in turn, support more growth? City officials responded that the addition of blending facilities or storage would not increase overall treatment capacity at the KIWWTP because they would only be used for peak wet-weather flows. Therefore, no additional capacity above the existing 40 million gallons could be sold to communities for new growth based on the plant improvements discussed at the meeting.

How to Protect the Little Lehigh Creek – Several people spoke about the desire to protect the Little Lehigh Creek, and asked questions about how the City's proposed changes at the KIWWTP might impact the Little Lehigh or help to eliminate upstream SSOs. The City representatives explained that the construction of wet-weather treatment facilities (blending or storage) at the KIWWTP only addresses treating the peak wastewater flows that are delivered to the plant. Eliminating upstream SSOs will require improvements and expansion of the infrastructure that collects and transports wastewater to the KIWWTP from the communities served by the system. Since this was not the topic of the meeting, the LCA and Western Lehigh Sewerage Partners' plans to address these infrastructure needs was not discussed.

Verify Water Quality Protections – Several people asked for additional data or general verification that the blending option would improve water quality, protect public health, comply with permit requirements, etc., which was the central theme of the City’s presentation. The City representatives confirmed that the use of blending would eliminate the use of Outfall 003 at the KIWWTP to discharge untreated wastewater during peak periods, and that the resulting treated discharge from the plant would meet permit requirements and result in overall improvement to water quality (*see “Outfall 003 Explanation” below*). However, more data may need to be developed to illustrate impacts of different scenarios (e.g. quality of raw sewage that is currently being discharged through Outfall 003 vs. quality of waste treated via blending technology vs. quality of waste treated via storing it and treating it after the rain event subsides).

Outfall 003 Explanation: The KIWWTP can currently treat peak flows up to 87 million gallons per day. The plant includes a mechanism called “Outfall 003” that currently discharges untreated wastewater to the Little Lehigh Creek during periods of peak wet-weather flows that exceed 87 million gallons per day (approximately once per year). Outfall 003 is located at the KIWWTP about 100 yards from the confluence of the Little Lehigh Creek and the Lehigh River. The City representatives explained that they plan to eliminate the use of Outfall 003 after the facilities are built for blending or storage of those peak flows. The current plant facilities would continue to be able to treat peak flows up to 87 million gallons per day, and the new blending or storage facilities would be used to treat excess peak flows above that threshold so that Outfall 003 is no longer needed. Therefore, all discharges of untreated wastewater to the Little Lehigh Creek from the KIWWTP would be eliminated.

Getting the Rainwater Out – While options to treat peak flows at the KIWWTP was the focus of this meeting, it was acknowledged by several members of the public and the City representatives that the peak flows are caused by rainwater / groundwater entering the sewer system. Addressing the root cause of the peak flows is an important goal for all municipalities, but specific plans were not discussed.

Legality / Permitting / Regulatory Positions – Some comments and questions were focused on EPA and DEP positions about blending and whether it will be allowed in Allentown. City representatives explained that blending is allowed and used in other regions of the nation and may ultimately be allowed in Allentown. However, they were reluctant to talk about specific legal issues in a public setting.

Concluding Thoughts

While the idea of using blending technology to treat peak wet-weather flows at the KIWWTP may not be universally embraced as a “perfect” solution as a result of this meeting, the City did a good job of explaining why it’s worth considering from both a financial and environmental perspective.

Based on the comments and questions offered at the meeting, what seemed to be missing from the presentation was a broader message about how the KIWWTP fits into the overall plan to address SSOs in our region. As we move forward, we need to help citizens and decision-makers understand not only that each individual piece of the solution is important, but also how each piece fits into the integrated program we are developing. Treating peak flows at the KIWWTP is just one piece of the larger regional solution we are jointly pursuing.

We are all investing heavily in our systems to achieve the goal of eliminating SSOs – both at the KIWWTP and throughout the watershed – and the public should know how seriously we are taking this responsibility to protect the environment and achieve compliance! This will require continued communication, information sharing and dialog in the months ahead as we prepare to submit a plan to EPA at the end of 2017.