Rebecca K. Crane, Environmental Engineer  
NPDES Enforcement Branch (3WP42)  
U.S. EPA Region III 1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Regional Flow Management Strategy  
Joint Submission by Kline’s Island Sewer System (KISS) Respondents  
EPA AO Dockets Nos. CWA-03-2009-0313DN and CWA-03-2007-0032DN

Dear Ms. Crane:

The City of Allentown (City) and Lehigh County Authority (LCA) are writing together today to jointly submit a Regional Flow Management Strategy (RFMS) on behalf of all municipalities named in the USEPA Administrative Orders referenced above. This submission represents a collaborative and cooperative effort among the parties to be responsive to the agency’s request as discussed at our March 23, 2018 meeting held at LCA offices, and further detailed in a letter submitted by David McGuigan from your office on April 3, 2018.

Through the course of this correspondence, EPA has requested the municipalities within the Kline’s Island Sewer System (KISS) to collaboratively develop an RFMS that includes the following critical elements: 1) collection system operation and maintenance; 2) system characterization; 3) inflow and infiltration removal; and 4) flow monitoring.

In addition to the RFMS and associated attachments, which detail work that is planned by each KISS municipality, we have also attached copies of the letters submitted by each respondent indicating their intent to work cooperatively on common elements of the RFMS such as flow monitoring and system characterization.

The submission enclosed captures all of the critical elements requested, and illustrates that a cooperative regional approach to managing sewer flows will be in place for the KISS moving forward. Therefore, we hereby request the agency confirm that our progress to date along with
this regional approach satisfies EPA’s requirements and that the Administrative Orders will be terminated. We further understand that oversight of our ongoing regional progress will shift to the Pa. Department of Environmental Protection for efficiency purposes and to better integrate the regional program with existing state regulatory and statutory programs.

Thank you for your assistance in guiding us to this regional approach. Please let us know should you have any questions or require additional information.

Sincerely,

Craig Messinger
Interim Public Works Director
City of Allentown

Liesel M. Gross
Chief Executive Officer
Lehigh County Authority

Enclosures: Submission letters from other KISS Respondents
Regional Flow Management Strategy (Strategy & Appendices)

CC: Pa. Department of Environmental Protection
City of Allentown
Lehigh County Authority
Coplay-Whitehall Sewer Authority
South Whitehall Township
Salisbury Township
Hanover Township
Upper Macungie Township
Lower Macungie Township
Upper Milford Township
Weisenberg Township
Lowhill Township
Borough of Emmaus
Borough of Macungie
Borough of Alburtis
Date: July 12, 2018

To: Craig Messinger, Interim Director of Public Works. City of Allentown
Liesel Gross, Chief Executive Officer, Lehigh County Authority

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger & Ms. Gross,

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer collection system serving the Borough of Alburtis service area. I have also enclosed a copy of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent Borough of Alburtis current system characterization efforts, which will be supplemented by the Regional Flow Management Strategy (RFMS) currently under development. Please submit these documents to the USEPA as part of our joint submission of the RFMS by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, Borough of Alburtis is committed to working with the City of Allentown and Lehigh County Authority to complete the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Kline’s Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality’s cooperation and collaboration on efforts to accurately measure sewage flows generated by Borough of Alburtis.

In addition, the Borough of Alburtis agrees to participate in the process for preparing and adopting any needed Act 537 Plan update in the future, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other conveyance system improvements, in accordance with applicable intermunicipal agreements relating to the conveyance to and treatment at KIWWTP of sewage flows generated by the Borough of Alburtis.

Our commitment to the RFMS will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to address issues of concern particularly related to wet weather flows.

Please provide a complete electronic copy of the Regional Flow Management Strategy to be submitted to the regulatory agencies for our records and contact me at your earliest convenience to begin this important work.

Sincerely,

Sharon L. Trexler
Borough Manager
Date: July 1, 2018

To: Craig Messinger, Interim Director of Public Works, City of Allentown
   Liesel Gross, Chief Executive Officer, Lehigh County Authority

RE: US EPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger & Ms. Gross:

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer collection system serving the Borough of Emmaus service area. I have also enclosed a copy of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent the Borough of Emmaus’ current system characterization efforts, which will be supplemented by the Regional Flow Management Plan (RFM) currently under development. Please submit these documents to the USEPA as part of our joint submission of the (RFM) plan by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, the Borough of Emmaus is committed to working with the City of Allentown and Lehigh County Authority to complete the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Kline’s Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality’s cooperation and collaboration on efforts to accurately measure sewage flows generated by the Borough of Emmaus. The Borough is currently in the process of repairing and replacing its master meters in cooperation with the City of Allentown and LCA.

In addition, the Borough of Emmaus agrees to participate in the Act 537 Plan update in the future, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other conveyance system improvements, as it pertains to the scope of all agreements we currently have with the City of Allentown and LCA.

Our commitment to the RFM will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to address issues of concern particularly related to wet weather flows.
Please provide a complete electronic copy of the Regional Flow Management Plan to be submitted to the regulatory agencies for our records, and contact me at your earliest convenience to begin this important work.

Sincerely,

Shane M. Pepe
Borough Manager
Date: July 21, 2018

To: Craig Messinger, Interim Director of Public Works. City of Allentown  
   Liesel Gross, Chief Executive Officer, Lehigh County Authority

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger & Ms. Gross:

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer collection system serving the Borough of Macungie service area. I have also enclosed a copy of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent the Borough of Macungie’s current system characterization efforts, which will be supplemented by the Regional Flow Management Strategy (RFMS) currently under development. Please submit these documents to the USEPA as part of our joint submission of the RFMS by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, Macungie Borough is committed to working with the City of Allentown and Lehigh County Authority to complete the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Kline’s Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality’s cooperation and collaboration on efforts to accurately measure sewage flows generated by Macungie Borough.

In addition, the Borough of Macungie agrees to participate in any needed Act 537 Plan update in the future, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other conveyance system improvements.

Our commitment to the RFMS will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to address issues of concern particularly related to wet weather flows.

Please provide a complete electronic copy of the Regional Flow Management Strategy to be submitted to the regulatory agencies for our records and contact me at your earliest convenience to begin this important work.

Sincerely,

Chris L. Boehm  
Borough Manager
Date: July 13, 2018

To: Graig Messinger, Interim Director of Public Works, City of Allentown
Liesel Gross, Chief Executive Officer, Lehigh County Authority

Ref: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger & Ms. Gross

Enclosed with this letter is a copy of the Coplay Whitehall Sewer Authority’s (CWSA) combined Operation & Maintenance (O&M) Plan / Inflow and Infiltration Source Reduction Plan (SRP) for the sanitary sewer collection system servicing the Coplay Whitehall Sewer Authority service area. This document represents CWSA’s current system characterization efforts, which will be supplemented by the Regional Flow Management Strategy (RFMS) currently under development. Please submit this document to the USEPA as part of our joint submission of the RFMS by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, the CWSA is cooperating with the City of Allentown and Lehigh County Authority to provide available data with respect to its portion of the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Klime’s Island Wastewater Treatment Plant (KlIIWTP). In particular, this work will include CWSA’s cooperation and collaboration on efforts to accurately measure sewage flows generated by the CWSA.

In addition, CWSA agrees to provide any data it may have or generate regarding its system, including future flow projections and/or flow monitoring results to aid in the determination of any needed Act 537 Plan update and for any other capital improvements at the KlIIWTP or other portions of the conveyance system the CWSA shares with other municipalities.

Our commitment to the RFMS will also include attendance and participation at regularly scheduled meetings and special meetings that may be required to address issues of concern particularly related to wet weather events and the associated sanitary sewer flows.

Please provide a complete electronic copy of the Regional Flow Management Strategy to be submitted to the regulatory agencies for our records and contact me at your earliest convenience to begin this important work.

Sincerely,

David A. Harleman, Manager
Coplay Whitehall Sewer Authority
Date: July 13, 2018

To: Craig Messinger, Interim Director of Public Works, City of Allentown

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger,

Enclosed with this letter is a copy of the Management, Operations & Maintenance (MOM) plan for the sewer collection system serving the Hanover Township, Lehigh County service area. I have also enclosed a copy of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent Hanover Township's current system characterization efforts, which will be supplemented by the Regional Flow Management Plan (RFM) currently under development. Please submit these documents to the USEPA as part of our joint submission of the (RFM) plan by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, Hanover Township is committed to working with the City of Allentown to complete the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Kline’s Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality's cooperation and collaboration on efforts to accurately measure sewage flows generated by Hanover Township.

In addition, Hanover Township agrees to participate in the Act 537 Plan update in the future, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other conveyance system improvements.

Our commitment to the RFM will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to address issues of concern particularly related to wet weather flows.

Please provide a complete electronic copy of the Regional Flow Management Plan to be submitted to the regulatory agencies for our records and contact me at your earliest convenience to begin this important work.

Sincerely,

Christopher L. Garges
Township Manager

CC: Council
    Liesel Gross, Chief Executive Officer, Lehigh County Authority
    J. Jackson Eaton III, Township Solicitor
    Al Korte, PE, Township Engineer

2202 Grove Road Allentown, PA 18109
610-264-1069 • 610-266-9292 • FAX: 610-264-2773
Date: July 10, 2018

To: Craig Messinger, Interim Director of Public Works. City of Allentown
    Liesel Gross, Chief Executive Officer, Lehigh County Authority

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN
    Western Lehigh Interceptor System
    Upper Milford Township
    Weisenberg Township
    Lowhill Township

Dear Mr. Messinger & Ms. Gross,

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer conveyance and collection systems Lehigh County Authority (LCA) operates within the Kline’s Island Sanitary Sewer Service area. These systems include the Western Lehigh Interceptor System as well as the collector systems in Upper Milford Township, Weisenberg Township, and Lowhill Township.

Also enclosed is a copy of our current Inflow and Infiltration Source Removal Plan (SRP) for all of the LCA-operated systems noted above. These documents represent the LCA’s current system characterization efforts, which supplement the Regional Flow Management Strategy (RFMS) currently under development. Please submit these documents to the USEPA as part of our joint submission of the RFMS by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, LCA is committed to working with the City of Allentown and City Signatories to complete the flow monitoring and system characterization of the shared treatment and conveyance systems that transport sewage to the Kline’s Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality’s cooperation and collaboration on efforts to accurately measure sewage flows generated by LCA, which includes the flow from the Western Lehigh Sewage Partners. This data will be supplemented with other strategically placed temporary meters to complete system characterization of the shared conveyance systems expected to be completed in 2019/2020 and repeated when the source reduction work is completed which is expected in 2026.

Every drop matters. Every customer counts.
In addition, the LCA agrees to participate in the Act 537 Plan update in the future for Upper Milford, Weisenberg, and Lowhill Townships, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other shared conveyance system improvements.

Our commitment to the RFMS will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to continue the cooperation and collaboration efforts throughout the program and to address issues of concern particularly related to wet weather flows.

Please provide a complete electronic copy of the Regional Flow Management Strategy to be submitted to the regulatory agencies for our records, and contact me at your earliest convenience to begin this important work.

Sincerely,

John Parsons
Chief Operations Officer
July 6, 2018

Craig Messinger, Interim Director of Public Works. City of Allentown
Liesel Gross, Chief Executive Officer, Lehigh County Authority

Dear Mr. Messinger & Ms. Gross,

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer collection system serving the Lower Macungie Township service area; I have also enclosed a copy of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent Lower Macungie Township’s current system characterization efforts, which will be supplemented by the Regional Flow Management Strategy (RFMS) currently under development. Please submit these documents to the USEPA as part of our joint submission of the RFMS by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, Lower Macungie Township is committed to working with the City of Allentown and Lehigh County Authority to complete the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Kline’s Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality’s cooperation and collaboration on efforts to accurately measure sewage flows generated by Lower Macungie Township.

In addition, Lower Macungie Township agrees to participate in any needed Act 537 Plan update in the future, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other conveyance system improvements. It is understood that participation in the Act 537 Plan will not alter the existing Act 537 public sewer service boundaries.

Our commitment to the RFMS will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to address issues of concern particularly related to wet weather flows. This letter should not be construed to have any effect on or modify any conditions, obligations, or terms established in any existing agreements.

Please provide a complete electronic copy of the RFMS to be submitted to the regulatory agencies for our records and contact me at your earliest convenience to begin this important work.

Sincerely,

Zachary C. Graves
Water Resources Specialist
Phone: 610-966-4343 x121
Email: ZGraves@lowermac.com
June 29, 2018

Mr. Craig Messinger, Interim Director of Public Works, City of Allentown and
Ms. Liesel Gross, Chief Executive Officer, Lehigh County Authority
PO Box 3348
Allentown, PA 18106

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger & Ms. Gross:

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer collection system serving the Salisbury Township service area. I have also enclosed a copy of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent Salisbury Township's current system characterization efforts, which will be supplemented by the Regional Flow Management Strategy (RFMS) currently under development. Please submit these documents to the USEPA as part of our joint submission of the RFMS by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information noted above, Salisbury Township is committed to working with the City of Allentown, Lehigh County Authority, and the other Signatories to complete the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Kline's Island Wastewater Treatment Plant (KIWWTP).

Our commitment to the RFMS will also include attendance and participation at meetings as necessary to address issues of concern related to wet-weather related flows.

Please provide a complete electronic copy of the Regional Flow Management Strategy to be submitted to the regulatory agencies for our records.

Sincerely,

Cathy Bonaskiewich
Township Manager

copy: Board of Commissioners
Date: July 13, 2018

To: Craig Messinger, Interim Director of Public Works. City of Allentown
    Liesel Gross, Chief Executive Officer, Lehigh County Authority

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger & Ms. Gross,

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer collection system serving South Whitehall Township, which is inclusive of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent MUNICIPAL SIGNATORY current system characterization efforts, which will be supplemented by supplement the Regional Flow Management Plan (RFM) currently under development. Please submit these documents to the USEPA as part of our joint submission of the (RFM) plan by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, South Whitehall Township is committed to working with the City of Allentown and Lehigh County Authority to complete the flow monitoring and system characterization of the shared treatment and conveyance systems that transport sewage to the Kline's Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality's cooperation and collaboration to continue to accurately measure sewage flows generated within our Township. This data will be supplemented with other strategically placed temporary meters to complete system characterization of the shared conveyance systems in 2019 and repeated in 2026.

In addition, South Whitehall Township agrees to participate in the Act 537 Plan update in the future, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other shared conveyance system improvements.

Our commitment to the RFM will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to continue the cooperation and collaboration efforts throughout the program and to address issues of concern particularly related to wet weather flows.

Please provide a complete electronic copy of the Regional Flow Management Plan to be submitted to the regulatory agencies for our records, and contact me at your earliest convenience to begin this important work.

Sincerely,

South Whitehall Township

[Signature]
Rebecca Bidwell, SHRM-SCP, SPHR
Township Manager
July 5, 2018

Mr. Craig Messinger, City of Allentown
Interim Director of Public Works
641 S. 10th Street
Allentown, PA 18103-3173

Ms. Liesel Gross
CEO, Lehigh County Authority
PO Box 3348
1053 Spruce Street
Allentown, PA 18106-0348

RE: USEPA Administrative Order, Docket No. CWA-03-2009-0313DN

Dear Mr. Messinger and Ms. Gross:

Enclosed with this letter is a copy of the Operations & Maintenance (O&M) plan for the sewer collection system serving the Upper Macungie Township service area. I have also enclosed a copy of our current Inflow and Infiltration Source Removal Plan (SRP). These documents represent Upper Macungie Township current system characterization efforts, which will be supplemented by the Regional Flow Management Strategy (RFMS) currently under development. Please submit these documents to the USEPA as part of our joint submission of the RFMS by August 1, 2018 to meet the requirements of the Administrative Order noted in the subject line above.

In addition to submitting the information above, Upper Macungie Township is committed to working with the City of Allentown and Lehigh County Authority to complete the flow monitoring and system characterization of the shared conveyance systems that transport sewage to the Kline’s Island Wastewater Treatment Plant (KIWWTP). In particular, this work will include our municipality’s cooperation and collaboration on efforts to accurately measure sewage flows generated by Upper Macungie Township.

In addition, Upper Macungie Township agrees to participate in any needed Act 537 Plan update in the future, using future flow projections and flow monitoring results to determine the potential need for capital improvements at KIWWTP or other conveyance system improvements. It is understood that participation in the Act 537 Plan will not change the current Township Act 537 public sewer service boundaries.
Our commitment to the RFMS will also include attendance and participation at regularly scheduled meetings and special meetings that might be required to address issues of concern particularly related to wet weather flows. This letter should not be construed to have any effect on or modify any terms, conditions or obligations set forth in any Agreements existing and in full force and effect as of the date of this letter.

Please provide a complete electronic copy of the Regional Flow Management Strategy to be submitted to the regulatory agencies for our records and contact me at your earliest convenience to begin this important work.

Sincerely,

Robert Ibach, Jr.
Township Manager
Upper Macungie Township