Administrative Order Update

Lehigh County Authority

12/11/2017
Two Administrative Orders

- **DEP Order - 2008**
  - Applies to LCA and Western Lehigh signatories
    - Upper Macungie, Lower Macungie, Upper Milford, Lowhill, Weisenberg, Alburtis & Macungie
  - Focused on reducing peak flows to offset new flows contributed by growth
  - Resulted in formal partnership – Western Lehigh Sewerage Partnership (WLSP)
  - Resulted in SCARP plan – Sewer Capacity Assurance & Rehabilitation Program
  - Conveyance flow credits provided based on demonstrated removal of flows

- **EPA Order – 2009**
  - Applies to all municipalities connected and who send flows to the Allentown wastewater treatment plant
  - Focuses on elimination of sanitary sewer overflows (SSOs)
  - Deadline to submit corrective action plan – 12/31/2017
WLSP Corrective Action Plan - Elements

- WLSP Source Removal Program –through 2025 (27% peak flow removal)
- Test & Seal Program – Western Lehigh Interceptor
- Park Pump Station rehabilitation & force main evaluation / rehab
- Other conveyance capacity projects – Trexlertown Interceptor or Iron Run Force Main
- O&M plans for all WLSP municipal systems & LCA facilities
- Metering & modeling in 2019 & 2025 to track progress
- Future phases of larger projects determined / designed after 2026 modeling work is complete, and incorporating Act 537 flow projections
- Ongoing source removal program & O&M
2015-2017 Planning Work

• Intensive work completed over the past 3 years to tie WLSP plans together with plans of other respondents -- especially the City of Allentown
  • WLSP peak flow reductions through 2025 could change size of Allentown projects at the treatment plant
  • Timing of other WLSP projects could send flows to the treatment plant faster

• Phased approach of WLSP plan works in concert with City’s phased plan for upgrades at the treatment plant plus other work on City interceptors
12/7/2017 Notice of Deadline Extension

• EPA extends deadline for all municipalities to submit corrective action plans
• Requests January 2018 meeting to discuss a path forward

• Why?
  • No formal regulatory determination on blending question
  • City / EPA letter exchange on blending & other alternatives
  • City / LCA / Signatory confusion about EPA’s intent (11/2 letter)
  • LCA 12/4 meeting with EPA / DEP
LCA Meeting with EPA & DEP – 12/4/2017

• Reaffirm WLSP commitment to system rehabilitation
• Review historical perspective of LCA / WLSP contributions to peak flow management in the region (PPS, FEB, SCPS → WWOL)
  • Explain interdependencies between WLSP plan and City plan
  • A change in the City’s approach will impact WLSP plan & vice versa
• How do EPA and DEP orders work together if one goes away per City’s request? (issue is unique to WLSP – reporting requirements, timing, etc.)
• EPA / DEP were happy to listen, no specific feedback provided
• 12/7/2017 deadline extension for all signatory submissions suggests LCA & City communications helped to generate an enhanced understanding of regional interdependencies
Path Forward?

• City, LCA & signatories will continue to meet & plan together
• January meeting with EPA – seek additional direction & deadlines
• LCA / WLSP corrective action plan still ready to go if deemed appropriate based on EPA feedback
• WLSP communities continue to discuss cost-sharing based on peak flow for future projects
• LCA seeks continued collaboration with City and signatories to develop an integrated approach
EPA Recommends an Integrated Approach...

Discussion