

Administrative Order Update

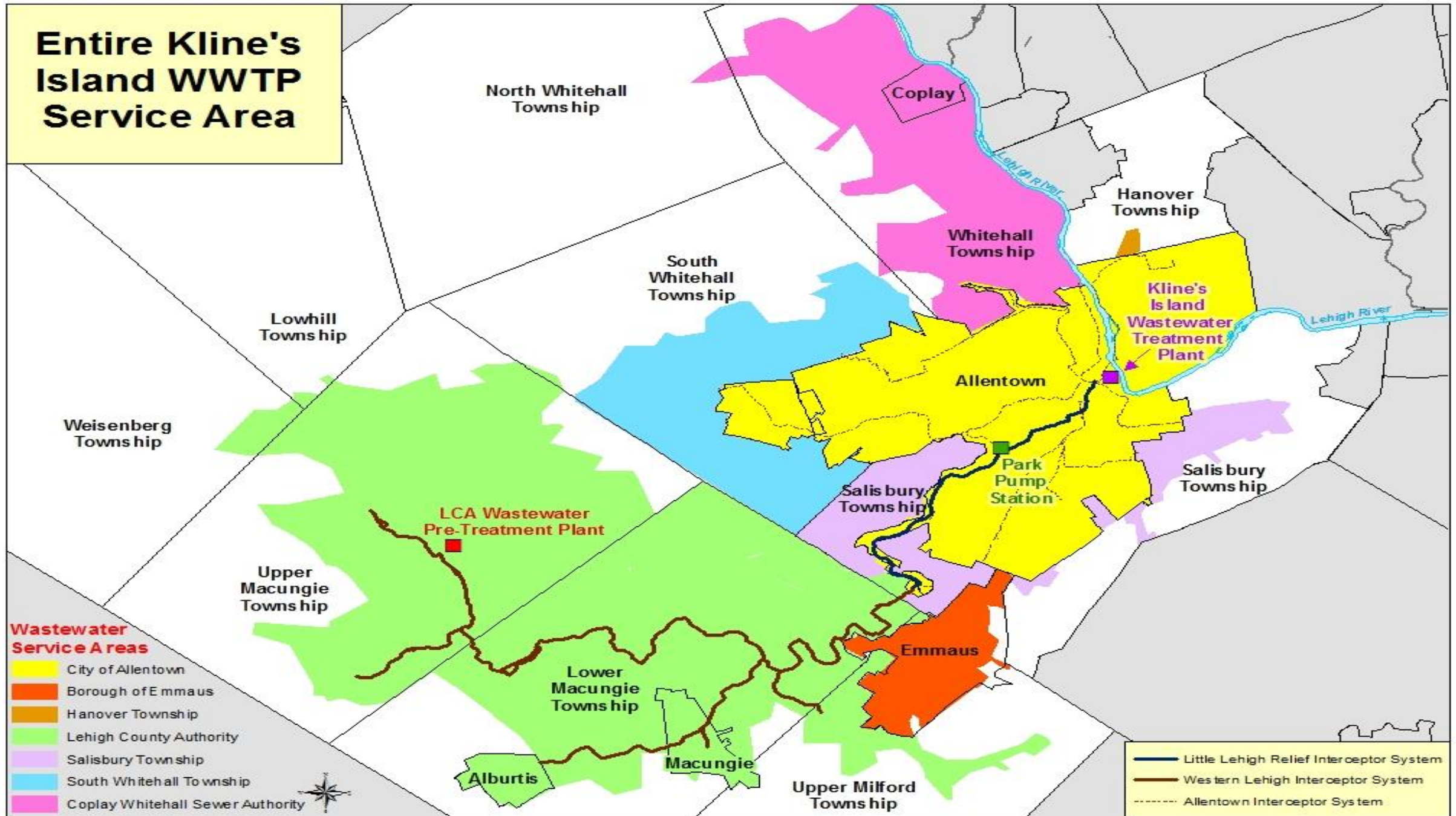
Lehigh County Authority

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

Entire Kline's Island WWTP Service Area



Wastewater Service Areas

- City of Allentown
- Borough of Emmaus
- Hanover Township
- Lehigh County Authority
- Salisbury Township
- South Whitehall Township
- Coplay Whitehall Sewer Authority

- Little Lehigh Relief Interceptor System
- Western Lehigh Interceptor System
- Allentown Interceptor System

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