



**LEHIGH COUNTY AUTHORITY**

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email: [service@lehighcountyauthority.org](mailto:service@lehighcountyauthority.org)

December 31, 2019

Scott Novatnak, Project Manager  
Department of Environmental Protection  
Clean Water Program  
Northeast Regional Office  
2 Public Square  
Wilkes-Barre, PA 18701-1915

RE: Kline's Island Sewer System; Allentown, PA  
Corrective Action Planning Work & 2020 Sewer Allocation Request

Dear Mr. Novatnak,

Lehigh County Authority (LCA) has been authorized to prepare this submission on behalf of all municipalities that are tributary to the Kline's Island Wastewater Treatment Plant (WWTP) located in Allentown, PA. The purpose of this submission is to review our region's understanding of the path forward to address hydraulic overload conditions the system has experienced in 2018 and 2019 during a two-year period of extraordinary precipitation. In addition, by virtue of this letter, the region hereby requests that the Pa. Department of Environmental Protection grant adequate sewer allocation for new planning modules / connections to be approved during the calendar year of 2020 while the actions outlined in this letter are being completed.

**Calendar Year 2020 Projected Planning Requests for Sewer Allocation:**

The region's total allocation request for 2020 is 1,496,192 gallons per day, which is outlined in greater detail in the following attachments:

**Attachment A – Kline's Island WWTP Municipalities 2020 Projected Planning Requests**

*(Note: This listing represents each municipality's best estimate of new planning requests that will be issued in the year 2020. If additional allocation is required during 2020, the impacted municipality will request such allocation from DEP at that time.)*

**Attachment B – Western Lehigh Sewerage Partnership (WLSP) Development Flow Credit Summary (2009-2020)**

**Kline's Island Sewer System; Allentown, PA**  
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Please note that the WLSP information is provided as a supplement to this submission as it is our region's understanding, based on our prior correspondence and conversations with you, that the WLSP's Sewer Capacity Assurance and Rehabilitation Program (SCARP) method of calculating and allocating development flow credits would be discontinued. Moving forward, all municipalities tributary to the Kline's Island WWTP (hereinafter referred to as the Kline's Island Sewer System or "KISS") will work under the same connection management plan as outlined in Attachment A and further described in this letter.

Following DEP's confirmation that the approach outlined in this letter is acceptable and sewer allocation will be granted to the region in accordance with this submission for the year 2020, a quarterly connection management plan report will be prepared and issued to DEP to list new plans for sewer connections that have been approved under this plan. The report will show, by KISS municipality, the planned new flows for 2020, the new plans approved and associated allocation granted, and the remaining balance of each KISS municipality's available allocation of flows for future development. These reports will be issued in electronic format to you directly by April 15, July 15 and October 15, 2020.

**KISS Planned Corrective Actions in 2020:**

In support of the sewer allocation request described above, the KISS municipalities have met with you over several months to develop an approach to achieve system compliance in the years ahead. This letter serves to describe our shared understanding of the outcome of these discussions, and we request your confirmation that this approach is acceptable:

**1. Interim Act 537 Plan**

The KISS municipalities have retained the services of ARRO Consulting to support the region's efforts to develop an Interim Act 537 Plan (Interim Plan), which we expect to submit to DEP by September 2020. Based on guidance provided by DEP during prior meetings, ARRO has prepared an initial Task Activity Report (TAR), which was submitted to you on December 31, 2019. We request your timely review and approval of this TAR so we can ensure the work will continue according to schedule.

This Interim Plan will outline the actions the region and each individual KISS municipality will take during a restricted time period of approximately five years. This time period is required to allow the region to develop a Long-Term Act 537 Plan as described below.

Along with the submission of the Interim Plan, the region expects to resubmit the Kline's Island WWTP Water Quality Management Part II Permit application with supporting details to

document the actual hydraulic capacity of the WWTP and its treatment capabilities to meet the projected new flows covered within the five-year planning horizon.

## **2. Long-Term Act 537 Plan**

In parallel with the work described above to develop and submit the Interim Plan, the KISS municipalities will begin working together to develop a Long-Term Act 537 Plan (Long-Term Plan) to address the future needs of the region. Developing this Long-Term Plan will require extensive flow monitoring and system characterization, development of long-term (20- or 30-year time horizon) future flow projections, and a review of alternatives for both treatment and conveyance capacity requirements in dry-day and wet-day scenarios. The planning schedule of engineering tasks, regional collaboration, negotiation of intermunicipal agreements and other critical planning activities will be outlined in the region's submission of the Interim Plan, although the work will commence as quickly as possible to meet the current target submission date of December 31, 2023. This submission schedule may be adjusted based on additional review and discussion among the KISS municipalities.

## **3. Regional Flow Management Strategy**

The KISS municipalities have previously submitted a Regional Flow Management Strategy (RFMS) to DEP in 2018 and responded to questions and comments provided by DEP in early 2019. As part of the region's preparation of the Interim Plan and the Long-Term Plan described above, elements of the RFMS will be incorporated into both documents to capture the regional elements the KISS municipalities will be cooperating to complete, as well as the individual programs each municipality will implement to achieve reduction of sources of inflow and infiltration within their collection systems. By incorporating the RFMS elements into these submissions, DEP will have the opportunity to review and approve the work as part of an official Act 537 process, which we understand to be DEP's preference.

The work described above has already commenced based upon verbal direction provided by DEP over the past several months. This letter serves to codify the KISS municipalities' commitment to completing this work as described above.

We request that you review this letter and contact us for additional discussion if required. At a minimum, the region requires confirmation in writing that the approach listed above is acceptable and that the sewer allocations described in this letter and associated attachments are granted for the calendar year 2020 while we complete the initial phases of this work and prepare the Interim Plan submission to DEP.



**Kline's Island Sewer System; Allentown, PA**  
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**Page 4**

Thank you for extending your expertise and willingness to collaborate with all KISS municipalities to address the region's sewer requirements.

Sincerely,



Liesel M. Gross  
Chief Executive Officer

Attachments as noted.

cc: Sent by email only to:

Bharat Patel, DEP  
Amy Bellanca, DEP  
Robert Corby, DEP  
T. Rustu, DEP  
City of Allentown  
Borough of Alburtis  
Borough of Coplay  
Borough of Emmaus  
Borough of Macungie  
Coplay-Whitehall Sewer Authority  
Hanover Township  
Lower Macungie Township  
Lowhill Township  
North Whitehall Township  
Salisbury Township  
South Whitehall Township  
Upper Macungie Township  
Upper Milford Township  
Weisenberg Township  
Whitehall Township

## ATTACHMENT A - PAGE 1

### Kline's Island WWTP Municipalities 2020 Projected Planning Requests

*Submitted to Pa. Department of Environmental Protection - December 31, 2019*

Municipality	2020 Projected Flows (Gallons per Day)*	Note**
Borough of Alburtis	0	Western Lehigh
Borough of Macungie	1,115	Western Lehigh
Lower Macungie Township	276,996	Western Lehigh
Lowhill Township	0	Western Lehigh
Upper Macungie Township	428,269	Western Lehigh
Upper Milford Township	669	Western Lehigh
Weisenberg Township	0	Western Lehigh
<b>Western Lehigh 2020 Projected Flows</b>	<b>707,049</b>	
Borough of Emmaus	63,630	
City of Allentown	444,807	
Coplay-Whitehall Sewer Authority***	107,085	
Hanover Township	0	
Salisbury Township	4,446	
South Whitehall Township	169,175	
<b>Non-Western Lehigh 2020 Projected Flows</b>	<b>789,143</b>	
<b>TOTAL 2020 PROJECTED FLOWS</b>	<b>1,496,192</b>	

\*The 2020 Projected Flows represent the municipalities' best estimate of new planning requests that will be submitted in 2020. Incorporated into the figures above are those Sewage Planning Modules that were submitted in 2019 but have not yet been returned with PA-DEP approval, as well as Planning Module requests that have been submitted directly to PA-DEP but not yet submitted or approved by the municipality. See page 2 for additional details.

\*\* Municipalities noted as "Western Lehigh" are those communities within the Western Lehigh Service Area covered previously by the Sewer Capacity Assurance & Rehabilitation Program (SCARP) connection management plan. Values shown on this chart represent new Sewage Planning Modules expected in 2020, so they can be incorporated into the regional connection management plan and allocation requested via this submission to PA-DEP. Please see Attachment B for a detailed review of the SCARP connection management plan performance from 2009 through 2020. Based on discussion with PA-DEP in 2019, it is expected that the SCARP program will be eliminated beginning in 2020 so that all Kline's Island WWTP municipalities will work within the allocation requested in this submission and as shown in the table above.

\*\*\* Coplay-Whitehall Sewer Authority provides direct sewer service to properties in North Whitehall Township, Whitehall Township and the Borough of Coplay. Figures represented in the chart above reflect 2020 Projected Flows for all municipalities served by the CWSA sewer system.

## ATTACHMENT A - PAGE 2

For Reference Only: The developments listed below are those with Sewage Planning Modules submitted in 2019 but not yet returned with PA-DEP approval, or Planning Module requests (postcards) submitted directly to PA-DEP but not yet submitted, reviewed or approved by the municipality. These developments are incorporated into the 2020 Projected Flows shown in the chart on page 1 of this document.

<b>Municipality</b>	<b>Development Name</b>
Borough of Emmaus	300 Furnace Street
Borough of Emmaus	Chestnut Ridge at Rodale
Borough of Emmaus	Hoffman
Borough of Emmaus	Slaski
Borough of Emmaus	The Townes at South Mountain
Borough of Macungie	Main Street Commons
City of Allentown	1110 North Sherman Street
City of Allentown	126-132 N Filbert Street
City of Allentown	222/228 North Arch Street
City of Allentown	Barnes Lanes
City of Allentown	Carlisle Apartments
City of Allentown	Luv @ Hugs
City of Allentown	Penn Square Section 6-7
City of Allentown	Riverview Lofts
City of Allentown	S. Carlisle/E. Cumberland Street
City of Allentown	The Waterfront Phase 2
Coplay-Whitehall Sewer Authority	1942 Schadt Avenue
Coplay-Whitehall Sewer Authority	4303 Spruce Street
Coplay-Whitehall Sewer Authority	Summit Street
Coplay-Whitehall Sewer Authority	Timberidge Apartments
Coplay-Whitehall Sewer Authority	Whitehall Multi-Tenant Building
Lower Macungie Township	1620 Hidden Valley Road
Lower Macungie Township	Jaindl Commercial Park North
Lower Macungie Township	Mountain View Estates
Lower Macungie Township	Red Maple MHP Expansion (Grange Rd)
South Whitehall Township	1960 Harold Avenue
South Whitehall Township	Blue Barn Estates
South Whitehall Township	Flex Building - Hausman Road
Upper Macungie Township	ATAS International, Inc.
Upper Macungie Township	BIA Office
Upper Macungie Township	Dr. Pepper / Park 100
Upper Macungie Township	Mill Creek Hotel
Upper Macungie Township	Route 100 Logistics Warehouse
Upper Macungie Township	Shoppes at Trexler Plaza
Upper Macungie Township	Werley Road (Laurel Fields)

## ATTACHMENT B – PAGE 1

### **Western Lehigh Sewerage Partnership (WLSP) Development Flow Credit Summary (2009-2020)**

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*Submitted to Pa. Department of Environmental Protection - December 31, 2019*

This report has been developed to provide a summary of all activity taken by the municipalities within the Western Lehigh service area, collectively known as the Western Lehigh Sewerage Partnership (WLSP). In June 2011, the Pa. Department of Environmental Protection approved the WLSP's Sewer Capacity Assurance and Rehabilitation Program (SCARP) approach, including a connection management plan that provided for new connections to the WLSP sewer system based on the accumulation of Development Flow Credits. These Development Flow Credits have been accumulated and allocated to new connections since. This report provides a summary of all Development Flow Credits earned and allocated from 2009 through 2018 as described in the annual SCARP reports submitted to DEP during this time period. In addition, this report provides detail on new Sewage Planning Modules approved in 2019, submitted and awaiting approval for 2019, and expected new modules for 2020. Finally, this report provides a description of additional Development Flow Credits that have not yet been claimed by the WLSP, which were earned due to work completed from 2009 through 2019, or planned in 2020, by all WLSP municipalities to eliminate sources of inflow and infiltration.

Through the review of these details, this report shows the WLSP has achieved the SCARP goal of completing important system upgrades and rehabilitation needed to provide capacity for new development during the time period of 2009 through 2020. However, as shown in Table 1, the WLSP anticipates a deficit in available Development Flow Credits through the end of 2020. This is due in part to the submission of a very large sewage planning module in 2019 that requires 400,000 gallons per day of allocation. In addition, this deficit reflects a change in methodology requested by DEP in 2019 in which Development Flow Credits are to be assigned to new developments as the sewage planning modules are submitted and approved. The previously approved method included in the SCARP documentation specified that Development Flow Credits would be assigned to a property only at the time of actual connection to the sewer system. The information provided in this report reflects a "true up" to include all planning modules that had not previously been assigned Development Flow Credits so the program is in compliance with DEP's updated methodology and preferences.

While it is the WLSP's understanding based on discussion with DEP in 2019 that the SCARP program will be eliminated and incorporated into the regional Kline's Island Sewer System connection management plan beginning in 2020 with this submission, this report is provided to support the WLSP municipalities' request for allocation to be granted for those new flows projected to be requested in 2020.

The following tables are included in this report:

Table 1	Summary of Western Lehigh Service Area - Sewer Capacity Assurance & Rehabilitation Program (SCARP) Connection Management Program (2009-2020)
Table 2	Development Flow Credits Earned through SCARP Program to Date (2009-2018)
Table 3	Unclaimed Development Flow Credits Earned through SCARP Program (2009-2019)
Table 4	Sewage Planning Modules Approved to Date (2009-2019)
Table 5	Sewage Planning Modules Approved in 2019 (Detail)
Table 6	Sewage Planning Modules Submitted to DEP and Awaiting Approval
Table 7	2020 Projected WLSP Planning Requests
Table 8	Development Flow Credits Anticipated from Planned 2020 Work

## ATTACHMENT B – PAGE 2

**Table 1 - Summary of Western Lehigh Service Area - Sewer Capacity Assurance & Rehabilitation Program (SCARP) Connection Management Program (2009-2020)**

This table provides a summary of the SCARP Development Flow Credit program, as projected through the end of 2020 based on previously earned, allocated and reported flow credits, current-year (2019) flow credits earned and allocated, and unclaimed flow credits earned.

<u>Description</u>	<u>Gallons Per Day</u>	<u>Source / Note</u>	<u>Reference</u>
Development Flow Credits Earned through SCARP Program to Date (2009-2018)	1,607,696	Annual SCARP Reports	Table 2
Unclaimed Development Flow Credits Earned through SCARP Program (2009-2019)	506,367		Table 3
Sewage Planning Modules Approved to Date (2009-2019)	(1,563,501)	<u>See Note A below</u>	Tables 4, 5
<b>Starting Balance of Development Flow Credits Available - January 1, 2020</b>	<b>550,562</b>	<u>See Note A below</u>	
Sewage Planning Modules Submitted to DEP and Awaiting Approval	(433,138)	Included in Kline's Island WWTP 2020 allocation request (Attachment A)	Table 6
2020 Projected WLSP Planning Requests	(273,911)		Table 7
Development Flow Credits Anticipated from Planned 2020 Work	147,072		Table 8
<b>Development Flow Credits Deficit through December 31, 2020</b>	<b>(9,415)</b>		

Note A:

Calculation of the Starting Balance of Development Flow Credits Available - January 1, 2020 is based on guidance provided by DEP in October 2019 that all approved Sewage Planning Modules must be assigned Development Flow Credits. The SCARP methodology used previously from 2009 to 2019 had allocated Development Flow Credits to a development *only when the property was actually constructed and connected to the sewer system*. Therefore, the figures in Table 1 above reflect a "true up" to include all Sewage Planning Modules approved during the period of 2009-2019, including those that had not previously been assigned Development Flow Credits through the prior SCARP process.

Tables 2-8 are offered on the pages that follow to provide additional detail in support of the figures shown on Table 1 as noted above.



## ATTACHMENT B – PAGE 3

**Table 2 - Development Flow Credits Earned through SCARP Program to Date (2009-2018)**

*(Source: Annual SCARP reports submitted to DEP 2011-2019 for calendar years 2009-2018)*

<b>Year</b>	<b>Development Flow Credits Earned (Gallons per Day)</b>
2009	-
2010	900,000
2011	324,000
2012	20,736
2013	2,592
2014	-
2015	7,776
2016	350,000
2017	2,592
2018	-
<b>TOTAL</b>	<b>1,607,696</b>

## ATTACHMENT B – PAGE 4

**Table 3 - Unclaimed Development Flow Credits Earned through SCARP Program (2009-2019)**

Each annual SCARP report since 2009 has provided a detailed listing of all work completed by each municipality during the prior calendar year. However, Development Flow Credits were not calculated or claimed for much of this work. The information shown below is a summary of all sewer system work completed in the SCARP program period of 2009-2019 for which Development Flow Credits were not previously calculated or claimed.

System rehabilitation work completed during this time period was prioritized based on a 2009 study of rainfall derived inflow and infiltration at the catchment level within all WLSP municipal sewer collection systems. The 2009 study included a rigorous flow monitoring program that provided leakage rates per lineal foot of sewer line within each catchment. The table below shows the estimate of total leakage removed based on this prior study.

Over the past 11 years, the WLSP municipalities and Lehigh County Authority (LCA) have collectively removed 1,154,556 gallons per day of system leakage. Development Flow Credits earned have been calculated as 30% of the leakage removed, in accordance with SCARP program documents approved by DEP in 2011. More details on this analysis are available upon request.

Work Description	System	Quantity	Leakage Removed (gallons per day)	Development Flow Credits Earned (gallons per day)
Cured-in-Place Mainline Lining	WLSP municipal systems	187,104 feet	357,869	107,361
Mainline Test and Seal	WLSP municipal systems	9,879 feet	31,886	9,566
Mainline Replacement	WLSP municipal systems	2,685 feet	12,197	3,659
Manhole Repairs	WLSP municipal systems	3,168 manholes	222,176	66,653
Lateral Lining	WLSP municipal systems	95 laterals	14,574	4,372
Leaking Cleanout Repairs	WLSP municipal systems	148 cleanouts	16,606	4,982
Leaking End Seal Repairs	LCA Iron Run Trunk Line	See Note B	279,360	83,808
Manhole Link Seal Repairs	LCA Western Lehigh Interceptor	See Note B	57,600	17,280
Interceptor Test and Seal	LCA Western Lehigh Interceptor	See Note B	162,288	48,686
Air Products	n/a - Allocation Returned 2019	n/a	n/a	160,000
<b>TOTAL Unclaimed Development Flow Credits Earned 2009-2019 (Gallons per Day)</b>				<b>506,367</b>

**Note B:**

Calculation of Leakage Removed for Lehigh County Authority (LCA) rehabilitation work on the Western Lehigh regional conveyance system is based on pre- and post-rehab video inspection of each repair completed.

## ATTACHMENT B – PAGE 5

**Table 4 - Sewage Planning Modules Approved to Date (2009-2019)**

*(Source: Annual SCARP reports submitted to DEP 2011-2019 for calendar years 2009-2018)*

*A detailed listing of Sewage Planning Modules approved in 2019 is provided in Table 5.*

<b>Year</b>	<b>Developments Approved (Gallons per Day)</b>
2009	178,115
2010	57,283
2011	23,640
2012	221,418
2013	118,440
2014	253,469
2015	276,009
2016	13,190
2017	74,358
2018	98,682
2019	248,897
<b>TOTAL</b>	<b>1,563,501</b>

**Table 5 - Sewage Planning Modules Approved in 2019**

<b>Project Name</b>	<b>Municipality</b>	<b>Planning Module Flow Request (Gallons per Day)</b>	<b>DEP Approval Date</b>	<b>Type</b>
Lutron Electronics	Lower Macungie	1,250	2/15/2019	Commercial
Millbrook Farms VI	Lower Macungie	9,366	2/27/2019	Residential
Lehigh Hills - Lot 5	Upper Macungie	125,696	3/19/2019	Residential
Hidden Meadows, Phase 1C	Upper Macungie	1,115	4/15/2019	Residential
4351 Indian Creek Rd	Lower Macungie	223	3/25/2019	Residential
6503 Lower Macungie Rd.	Lower Macungie	465	5/31/2019	Residential
Werley Road LPSS	Upper Macungie	1,115	4/3/2019	Res./Comm.
Daniel Street LPSS	Upper Macungie	892	3/19/2019	Commercial
Depot Properties, LLC	Lower Macungie	485	4/18/2019	Commercial
Convenience Store-150 N 10th Street	Emmaus	1,600	5/8/2019	Commercial
Air Products & Chemicals	Upper Macungie	100,000	4/3/2019	Commercial
Woodmont Ridge, Phase II	Upper Macungie	6,690	3/18/2019	Residential
<b>TOTAL Sewage Planning Modules Approved in 2019 (Gallons per Day)</b>		<b>248,897</b>		

## ATTACHMENT B – PAGE 6

**Table 6 - Sewage Planning Modules Submitted to DEP and Awaiting Approval**

<b>Project Name</b>	<b>Municipality</b>	<b>Planning Module Flow Request (Gallons per Day)</b>	<b>DEP Approval Date</b>	<b>Type</b>
Mountain View Estates	Lower Macungie	6,021	Awaiting	Residential
ATAS International, Inc.	Upper Macungie	1,560	Awaiting	Industrial
Mill Creek Hotel	Upper Macungie	17,000	Awaiting	Commercial
Deanna Caldwell-1620 Hidden Valley	Lower Macungie	223	Awaiting	Residential
Route 100 Logistics Warehouse	Upper Macungie	1,200	Awaiting	Commercial
Shoppes at Trexler Plaza	Upper Macungie	1,784	Awaiting	Commercial
Jaindl Commercial Park North	Lower Macungie	4,200	Awaiting	Commercial
Barry Isett & Assoc. (Crackersport Rd)	Upper Macungie	1,150	Awaiting	Commercial
Park 100-7352 Industrial Blvd.	Upper Macungie	400,000	Awaiting	Industrial
<b>TOTAL Sewage Planning Modules Awaiting Approval (Gallons per Day)</b>		<b>433,138</b>		

## ATTACHMENT B – PAGE 7

**Table 7 - 2020 Projected WLSP Planning Requests**

<b>Project Name</b>	<b>Municipality</b>	<b>EDUs</b>	<b>Planning Module Flow Request (Gallons per Day)</b>	<b>Expected Planning Module Submission</b>	<b>Type</b>
8240 Spring Creek Rd	Lower Macungie	6	1,250	2020	Light Industry
3200 Orchard Rd	Lower Macungie	2	485	2020	Commercial
5374 Hamilton Blvd	Lower Macungie	19	4,237	2020	Commercial
8783 Congdon Hill Dr	Lower Macungie	47	10,444	2020	Heavy Industry
8615 Congdon Hill Dr	Lower Macungie	47	10,444	2020	Heavy Industry
8449 Congdon Hill Dr	Lower Macungie	47	10,444	2020	Heavy Industry
8444 Congdon Hill Dr	Lower Macungie	47	10,444	2020	Heavy Industry
8323 Congdon Hill Dr	Lower Macungie	47	10,444	2020	Commercial
6240 Hamilton Blvd	Lower Macungie	5	1,200	2020	Commercial
6217 Hamilton Blvd	Lower Macungie	5	1,200	2020	Commercial
1111 Grange Rd	Lower Macungie	11	2,380	2020	Commercial
6150 Hamilton Blvd	Lower Macungie	26	5,900	2020	Commercial
4521 Indian Creek Rd	Lower Macungie	42	9,366	2020	Residential
3611 Gehman Rd	Lower Macungie	85	18,955	2020	Residential
3440 Grandview Dr	Lower Macungie	85	18,950	2020	Commercial
3262 Schoeneck Rd	Lower Macungie	16	3,500	2020	Light Industry
617 N Krocks Rd	Lower Macungie	416	92,768	2020	Residential
4511 Cedarbrook Rd	Lower Macungie	57	12,711	2020	Commercial
6452 Hamilton Blvd	Lower Macungie	5	1,104	2020	Commercial
7785 Spring Creek Rd	Lower Macungie	5	1,200	2020	Commercial
5415 Indian Creek Rd	Lower Macungie	2	446	2020	Residential
8189 Hamilton Blvd	Lower Macungie	112	24,976	2020	Residential
4440 Hamilton Blvd	Lower Macungie	5	1,200	2020	Commercial
5621 Hamilton Blvd	Lower Macungie	15	3,345	2020	Commercial
3370 Pa Route 100	Lower Macungie	16	3,500	2020	Commercial
6718 Hamilton Blvd	Lower Macungie	15	1,200	2020	Commercial
3500 Brookside Road	Lower Macungie	20	4,460	2020	Residential
Laurel Fields 5 - Werley Rd	Upper Macungie	25	5,575	2020	Residential
220 W Main Street	Macungie	5	1,115	2020	Commercial
Linda Lane	Upper Milford	3	669	2020	Residential
<b>TOTAL 2020 Projected planning Requests (Gallons per Day)</b>			<b>273,911</b>		



## ATTACHMENT B – PAGE 8

**Table 8 - Development Flow Credits Anticipated from Planned 2020 Work**

The work listed below is planned by the Western Lehigh municipalities and LCA in furtherance of the WLSP inflow and infiltration (I&I) source removal program. The leakage removal estimates, totaling 490,242 gallons per day, are based on prior flow modeling work described earlier this report, along with visual and video inspection of LCA's regional conveyance system components. Development flow credits are assigned based on the SCARP program parameters that allow for 30% of leakage removed to be allocated to new connections.

<b>Work Description</b>	<b>System</b>	<b>2020 Planned Quantity</b>	<b>Leakage Removal Estimates (gallons per day)</b>	<b>Development Flow Credits Anticipated (gallons per day)</b>
Mainline Replacement	WLSP municipal systems	1,200 feet	5,451	1,635
Manhole Replacement	WLSP municipal systems	10 manholes	701	210
Lateral Replacement	WLSP municipal systems	715 laterals	109,690	32,907
Leaking End Seal Repairs	LCA Iron Run Trunk Line	10 end seals	144,000	43,200
Interceptor Manhole Repairs	LCA Western Lehigh Interceptor Floodplain Locations	40 manholes	230,400	69,120
<b>TOTAL Development Flow Credits Anticipated from Planned 2020 Work (Gallons per Day)</b>				<b>147,072</b>

In 2019, the WLSP initiated a flow monitoring program to collect updated flow data to be used in recalibrating the hydraulic model for the Western Lehigh service area. The flow model recalibration will be completed by mid-2020, at which time the WLSP I&I source removal program will be evaluated and new work prioritized for years 2021 and beyond.



**pennsylvania**

DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

January 17, 2020

Ms. Liesel Gross, Chief Executive Officer  
Lehigh County Authority  
P.O. Box 3348  
Allentown, PA 18106-0348

Re: Interim Sewer Connection Allocation  
Kline's Island Wastewater Treatment Facility Service Area  
City of Allentown, Lehigh County

Dear Ms. Gross:

The Department of Environmental Protection (DEP) has received and reviewed the Lehigh County Authority's (Authority) December 31, 2019 (received by the Department on January 2, 2020) submission regarding the Interim 2020 Sewer Connection Allocation Request.

Upon review of the submission, the Department hereby grants a sewer connection allocation of 1.50 MGD. This allocation shall be administered and disbursed by the Authority for sewage planning (under the Pennsylvania Sewage Facilities Act - Act 537) and municipal wasteload management purposes in all municipalities' and authorities' sewer service areas whose wastewater collection and conveyance systems are tributary to the Kline's Island Wastewater Treatment Facility. In accordance with Section 94.21.b of the Department's Regulations, this allocation modifies the sewer connection prohibition currently in place within the entire Kline's Island Wastewater Treatment Facility service area but does not lift it. All sewer connection requests from individuals or other entities must be made, in writing, to the Authority. Subsequently, all allocation awards to individuals or other entities, from the Authority, must be made in writing by an authorized Authority official(s).

To properly track the 1.50 MGD sewer connection allocation, the Department is enclosing a Quarterly Status Report of Sewage Allocation Form (Report). This Report must be completed by the Authority and submitted to the Department's Northeast Regional Office within 14 calendar days after the end of each calendar year quarter. All connections/gallons granted from this and any future sewer connection allocation(s) must be reported to the Department on this Report form. A Report must be submitted, to the Department, even if no allocation is granted by the Authority during a particular calendar year quarter.

Failure to provide the Department with accurate and timely Quarterly Reports, proper wastewater planning documents for Official Sewage Facilities Plan Revisions (a municipality responsibility as required by the Pennsylvania Sewage Facilities Act-Act 537 and the Department's Regulations), when appropriate, for land development or failure to comply with the activities outlined in the Authority's December 31, 2019 correspondence may result in revocation of part or all of the sewer connection allocation. A copy of the Authority's letter granting any entity a sewer connection from the Authority's sewer connection allocation must accompany any wastewater planning documents submitted to the tributary municipalities or the

Department for review. The respective collection system owner and municipality in which the affected property is located shall also receive a copy of all allocations/gallongage granted, via written correspondence, from the Authority.

In addition to the above, the Department is requesting submittal of written progress reports to the Department on a quarterly basis. The reports are due on or before the fifteenth (15th) day of the month following the end of the calendar quarter. The first progress report is due on or before April 15, 2020.

Please contact Mr. Scott Novatnak at (570) 826-2337 or at [snovatnak@pa.gov](mailto:snovatnak@pa.gov) if you have any questions.

Sincerely,



Bharat Patel, P.E.  
Environmental Program Manager  
Clean Water Program

Enclosure: Quarterly Status Report of Sewage Allocation Form

cc: Ms. Sharon Trexler, Borough Manager/Alburtis Borough (w/Enclosure)  
Mr. Michael Hanlon, City Clerk/City of Allentown (w/Enclosure)  
Mr. Craig Messinger, Director of Public Works/City of Allentown (w/Enclosure)  
Ms Kimberly Bachman, Secretary/Coplay Borough (w/Enclosure)  
Mr. Shane Pepe, Manager/Emmaus Borough (w/Enclosure)  
Ms. Vicky Roth, Interim Manager/Hanover Township (w/Enclosure)  
Mr. Bruce Beitel, Manager/Lower Macungie Township (w/Enclosure)  
Mr. Brian Carl, Manager/Lowhill Township (w/Enclosure)  
Mr. Robert Glisson, Manager/Macungie Borough (w/Enclosure)  
Mr. Chris Garges, Manager/North Whitehall Township (w/Enclosure)  
Ms. Cathy Bonaskiewich, Manager/Salisbury Township (w/Enclosure)  
Ms. Renee Bickel, Manager/South Whitehall Township (w/Enclosure)  
Mr. Robert Ibach Jr., Manager/Upper Macungie Township (w/Enclosure)  
Mr. Edward Carter, Manager/Upper Milford Township (w/Enclosure)  
Mr. Brian Carl, Administrator/Weisenberg Township (w/Enclosure)  
Mr. Michael Harakal Jr, Mayor/Whitehall Township (w/Enclosure)

DATE: \_\_\_\_\_

Quarterly Status Report of Sewage Allocation  
(To be Completed and Submitted to the Department  
Within Fourteen [14] Days at the End of Each Calendar Year Quarter)

Authority/Municipality Lehigh County Authority – Kline’s Island WWTF Service Area

County Lehigh

Municipalities Served Alburtis Borough, City of Allentown, Coplay Borough, Emmaus Borough,

Hanover Twp, Lower Macungie Twp, Lowhill Twp, Macungie Borough,

North Whitehall Twp, Salisbury Twp, South Whitehall Twp, Upper

Macungie Twp, Upper Milford Twp, Weisenberg Twp, Whitehall Twp

Reporting Period \_\_\_\_\_ To \_\_\_\_\_

Balance of Allocation Available at the End of the Last  
Reporting Period \_\_\_\_\_

Additional Allocations Awarded \_\_\_\_\_

Connections/EDU’s/Gallonge Granted During This Reporting Period

Name of Applicant or Developer or Property Owner	Development or Property Name (As Applicable)	Physical Street Address or Lot Number of Property for Connection	Municipality That Development or Property is Located Within	No. of EDU’s, Connections or Gallonge Granted	Date Connection or Gallonge Granted to Applicant

(Attach Additional Sheets or Use Reverse of Form If Needed)

Total Connections/Gallonge Granted During This Reporting Period \_\_\_\_\_

Balance of Allocation Remaining in EDU’s or Gallonge \_\_\_\_\_