

# **EPA Administrative Order (AO) Compliance Plan July 11, 2016**

The AO is a regional problem. It demands a regional solution. A successful, long-term response to the AO will require collective, collaborative action among the Western Lehigh communities and municipal systems that contribute to wastewater flow processed by the treatment plant in Allentown.

We've undertaken a methodical, scientific, rational approach to dealing with the overflow problem to develop a solution that balances the need to protect our environment with public's ability to pay for the improvements.

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July 11, 2016

# SEWER CAPACITY ASSURANCE & REHABILITATION PROGRAM (SCARP)

USEPA Administrative Order and PADEP Chapter 94 Corrective Action Requirements Plan of Action Briefing













# **Meeting Objectives**



Describe the proposed overall sewer capacity plan

- Drivers
- Phasing
- Costs
- Next Steps

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## **Agenda**

- 1. I&I Primer
- 2. Root Causes
- 3. Regulatory Commitments
- 4. Regional Collaboration

- 6. WLSP and COA
  Alternative Analyses
- 7. Selected Approach, Sequence, and Costs
- 8. Path Forward
- 9. Questions and Discussion





14 July 2016

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### Sewer Capacity Assurance and Rehabilitation Program Objectives



- Reduce peak wet weather and baseline flows to:
  - Minimize capacity expansion of the interceptors
  - Prevent expansions at Kline Island WWTP
- Eliminate dry and wet weather SSOs in sewer systems
- Provide long term sustainability of the sanitary sewer systems

### Cut to the chase...

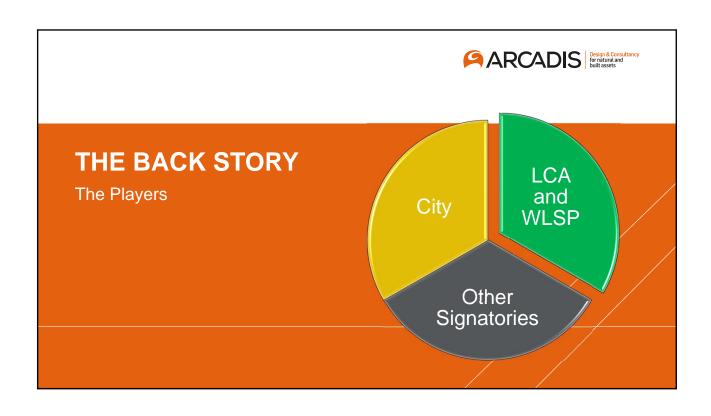
Total Program	\$461M+
Partners	\$212M
Allentown	\$110M
Lehigh County Authority	\$139M
Other Signatories	???

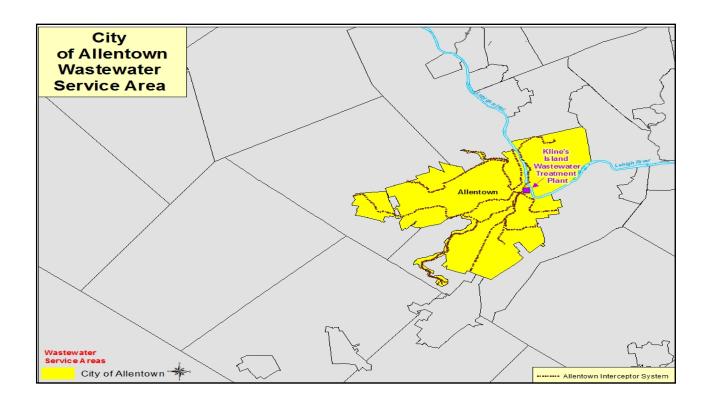


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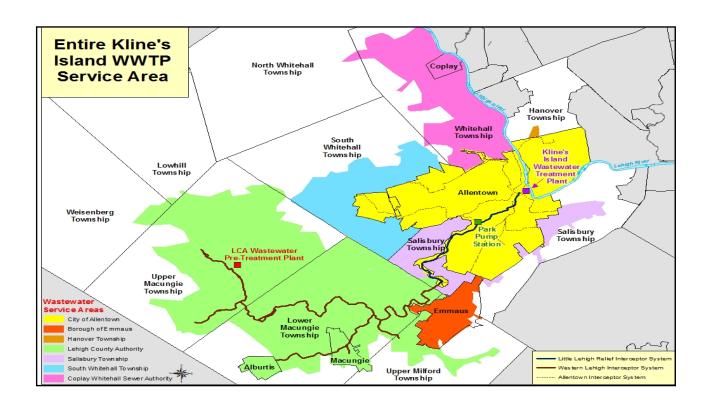
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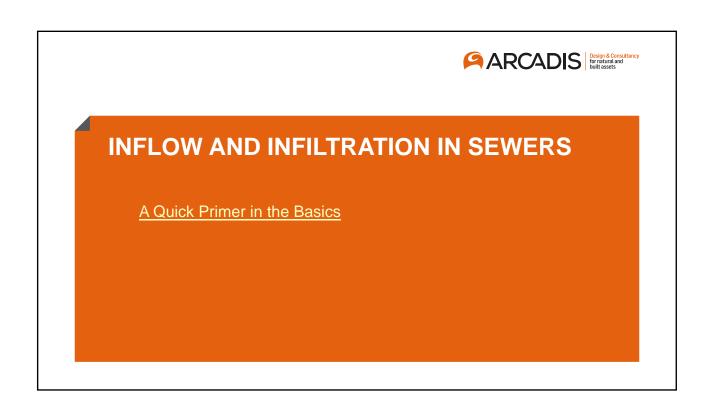




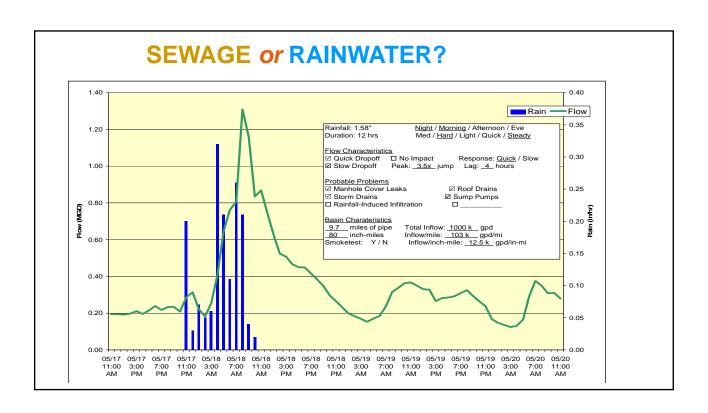






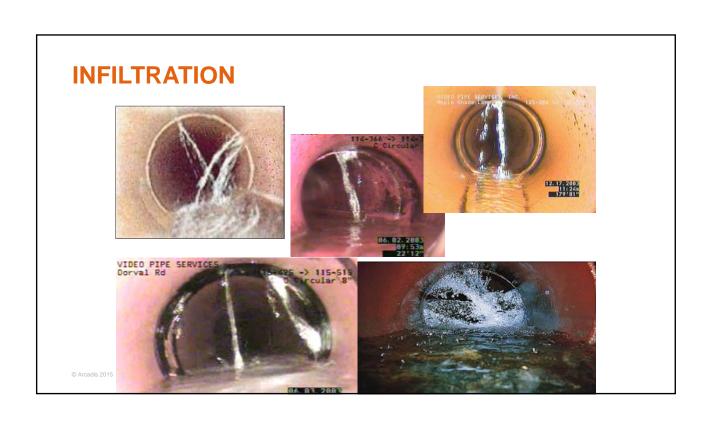




















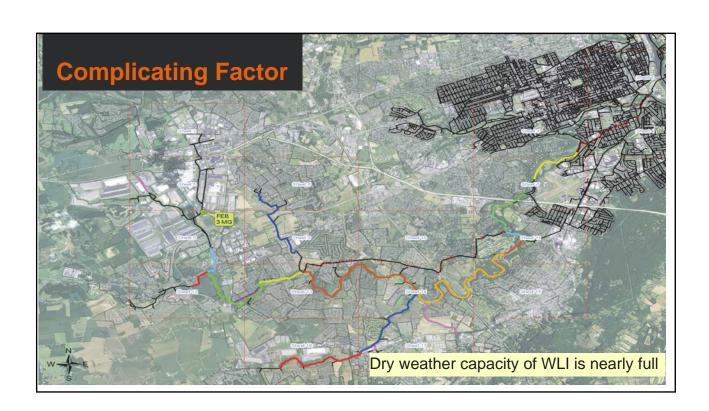


### **Root Causes**

- · Peak wet weather flows
  - Exceed capacity of the WLI, LLI, and PPS
    - SSOs were 2x per year before FEB
    - · Now every other year
  - Exceed capacity of the KI WWTP headworks, causing bypasses at Outfall 003
    - Bypasses were 2x per year before FEB
    - Now every other year
- Infiltration is chewing up base capacity intended for planned 537 growth
- The oldest sewers are at the end of their life



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### **Main Regulatory Drivers**

- PADEP is limiting new connections (94.21 rules) based on wet weather capacity in Western Lehigh Interceptor
- USEPA Administrative Order based on wet weather overflows
- Capital Improvement Plan to USEPA and PADEP in accordance with 2009 SCARP Program Approach Outline by 12/31/17
  - Specific scopes of work
  - Construction schedules

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# Regional Collaboration



### **Regional Collaboration**

- Western Lehigh Sewerage Partners (WLSP)
  - Regular Engineers Meetings
  - Monthly Meetings with Partners
    - Finalizing BOR and CIP
    - Memorandum of Cooperation
    - Coordinated Bidding Schedule
    - Standardized Construction Specifications
    - Communications Plan





### **Regional Collaboration**



### City of Allentown and WLSP

- Monthly Program Manager's AO Planning meeting
- Sharing of costs, data, CIP
- Coordinated construction schedules
- Use of the same hydraulic model (KISS model)





### **Regional Collaboration**



### Other COA Signatories

- Individual Signatory meetings to brainstorm corrections to flow meter data issues
- Signatory Meetings to present the City CIP and allocation of costs methodology
- Engineers Meetings to encourage collaboration





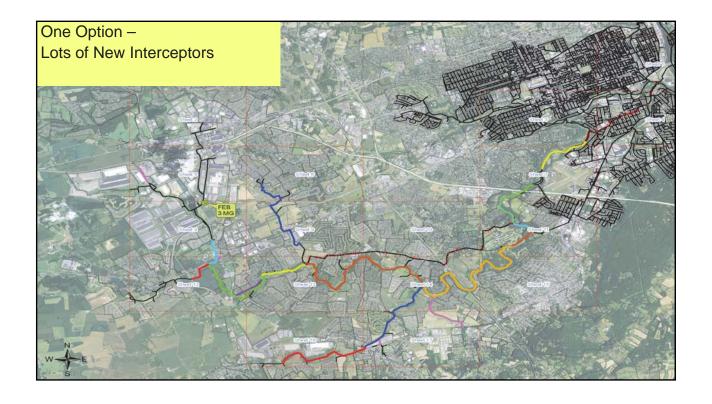
# **WLSP Alternative Evaluation**



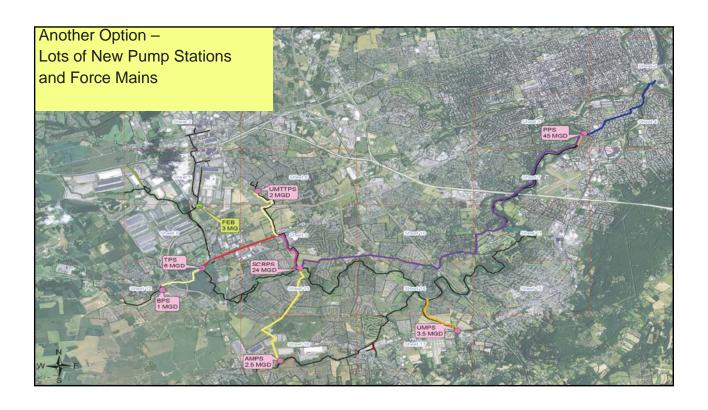
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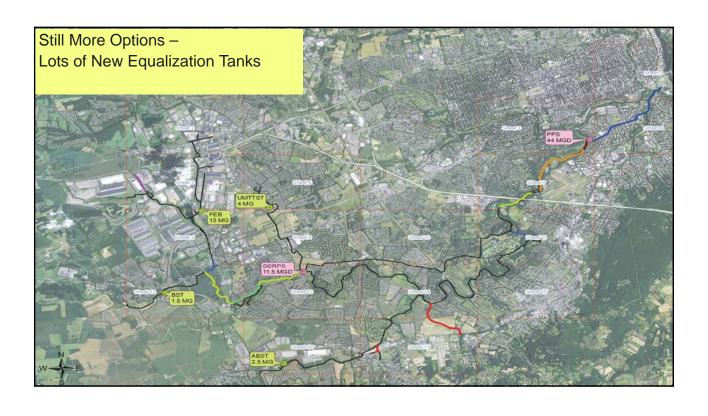


# Solution Planning • Klines Island Sewer System (KISS) model • Based on Year 2040 flow projections • ~4 additional MGD from WLSP • Approaches considered • Source reduction • Storage • Gravity conveyance • Pumping • Blending Solution Planning covers both Current and Future flows

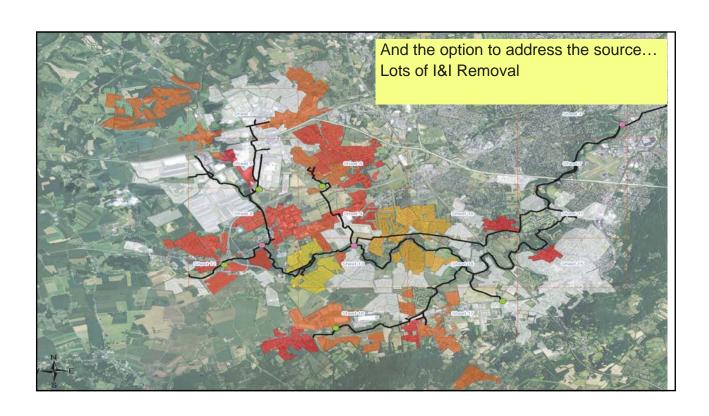








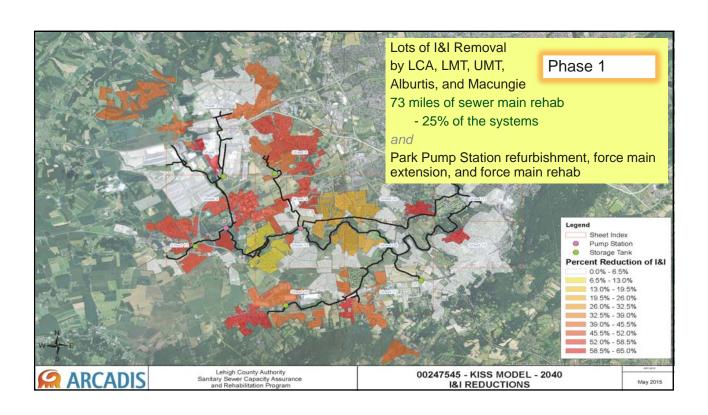




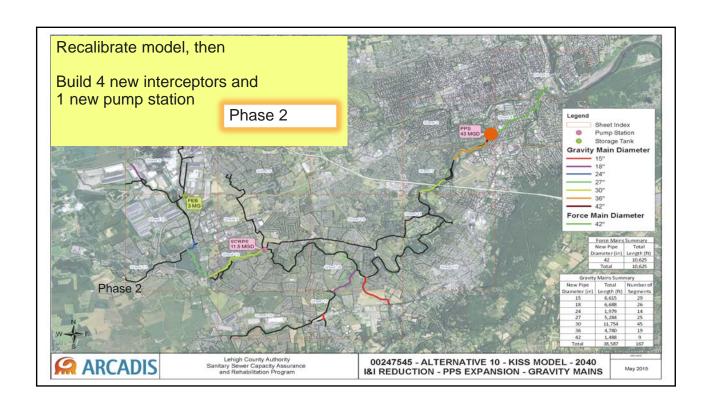
			Weste	rn Lehigh S	ewer Partne
Alternativ No.	re Description	COA	+ LCA	Total NPC Rank	
1	Pure Gravity	\$	264	7	
2	Pure Gravity except PPS pumps all flow	\$	298	10	
3	Pure Pumping	\$	329	12	
5	Mostly Tanks, some Gravity, with SCRPS and PPS left unchanged	\$	305	11	
6	Mostly Tanks, some Gravity, with SCRPS left unchanged and PPS upsize to pump all flow	\$	265	8	
7	Tanks, Pumps, some gravity, PPS upsized to pump all flow	\$	224	1	
9	Alt 1 plus I&I Removal	\$	266	9	
10	Alt 2 plus I&I Removal	\$	230	2	
11	Alt 3 plus I&I Removal	\$	239	4	
13	Alt 1, plus ABST, plus I&I Removal	\$	256	6	
14	Alt 1, plus ABST, plus I&I Removal	\$	235	3	
15	Tanks, Pumps, some gravity, PPS upsized to pump all flow	\$	239	4	14 July 2016



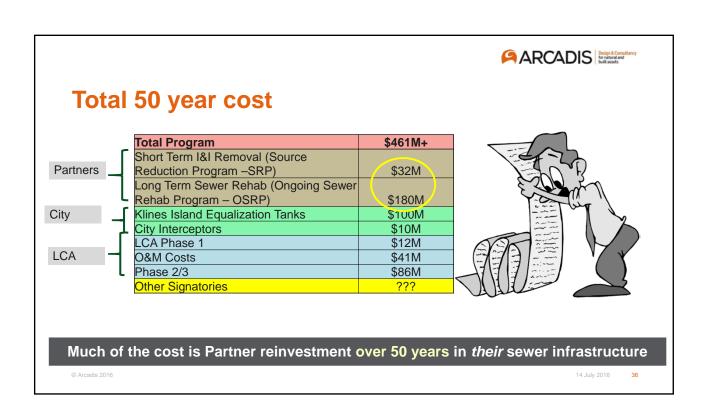




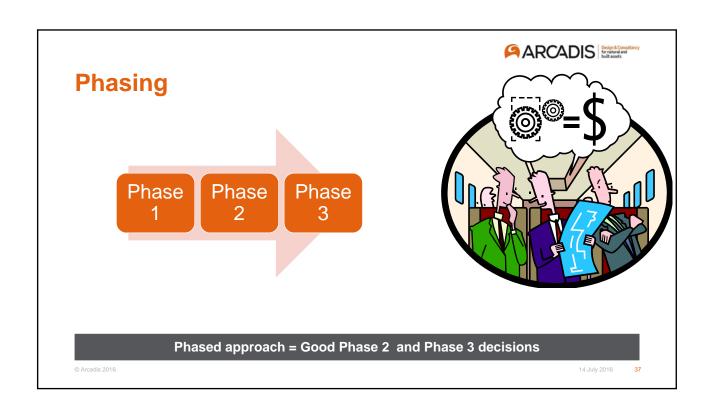


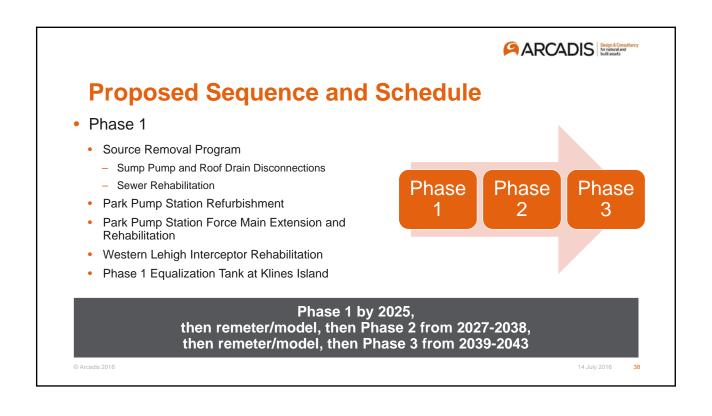


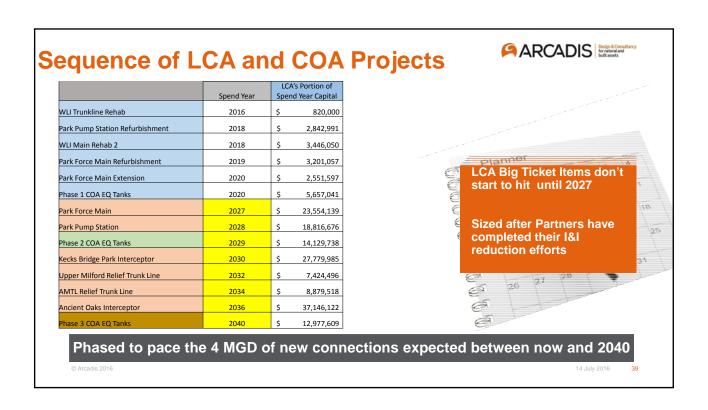


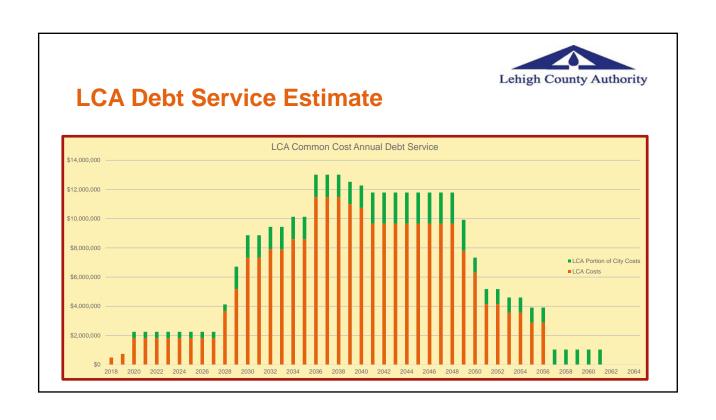














# **Path Forward**

LCA and COA WLSP and LCA WLSP LCA COA

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	1000		
	Lehigh	County	Authority
Task Name	Duration	Start	Finish
SCARP Preliminary Time Line	99.8 wks	2/3/16	1/1/18
Combined WSLP/COA Selected Approach Confirmation	12 wks	2/3/16	4/26/16
COA Cost Allocation Basis	11.2 wks	2/8/16	4/25/16
COA Signatory Briefings and Negotiations	14 wks	4/26/16	8/1/16
COA Peak Flow Agreement Negotiation	28 wks	7/5/16	1/16/17
WLSP Phase 1 and Phase 2 Cost Allocation	13 wks	2/3/16	5/3/16
Source Removal Program Definition	22 wks	2/3/16	7/5/16
Park PS Phase 1 Need	35 wks	2/3/16	10/4/16
Park PS Force Main Phase 1 Need	35 wks	2/3/16	10/4/16
WLSP Phase 1 Cash Flow Planning	48 wks	5/4/16	4/4/17
Ongoing Sewer Rehabilitation Program Definition	24 wks	2/3/16	7/19/16
Signatory Billing Meters	99.8 wks	2/3/16	1/1/18
SCARP Capital Recover Fee Determination	55 wks	2/3/16	2/21/17
WLSP Phase 2 Cash Flow Planning	24 wks	2/15/17	8/1/17
<b>WLSP Memorandum of Cooperation Negotiation</b>	40 wks	7/27/16	5/2/17
WLSP Long term Asset Management Plan (CMOM Plan)	65 wks	10/3/16	12/29/17
WLSP Capital Improvement Plan	31 wks	4/12/17	11/14/17
COA and COA Signatory Capital Improvement Plans	31 wks	1/17/17	8/21/17

# **Path Forward**

LCA and COA **WLSP** and LCA WLSP LCA

COA

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sk Name	Duration	Start	Finish
th Forward Engineering and Construction	1367 wks	2/29/16	5/9/42
RP Scoping, Standards, Approaches, Sequences, and Schedules	52 wks	2/29/16	2/24/17
RP 2018 Projects	93 wks	3/20/17	12/31/18
RP 2019 Projects	107 wks	12/12/17	12/31/19
RP 2020 Projects	107.2 wks	12/13/18	12/31/20
RP 2021 Projects	107 wks	12/13/19	12/31/21
RP 2022 Projects	107 wks	12/11/20	12/30/22
RP 2023 Projects	107 wks	12/10/21	12/29/23
RP 2024 Projects	107 wks	12/13/22	12/31/24
RP 2025 Projects	107 wks	12/13/23	12/31/25
VLI and Manhole Rehab	85 wks	11/11/16	6/29/18
(I Blending/EQ1	195 wks	1/17/17	10/12/20
ark Pump Station Refurbishment	146 wks	10/5/16	7/23/19
ark Force Main Rehab and Extension	230 wks	10/5/16	3/2/21
rout Creek and Tioga Interceptor Parallels	143 wks	4/3/23	12/26/25
nd of Phase 1 Performance Evaluation	77 wks	8/25/25	2/12/27
ittle Sister Pump Station Force Main	661 wks	9/5/16	5/4/29
ittle Sister Pump Station	668 wks	9/5/16	6/22/29
(I Blending/EQ2	186 wks	6/8/26	12/28/29
Cecks Bridge Park Interceptor	254 wks	2/5/26	12/18/30
JMiT Trunkline Parallel	305 wks	2/15/27	12/17/32
ordan Creek Interceptor Parallel	357.4 wks	2/15/27	12/20/33
MB Trunkline Parallel	409.6 wks	2/15/27	12/20/34
Ancient Oaks Interceptor Parallel	514 wks	2/15/27	12/19/36
nd of Phase 2 Performance Evaluation	135 wks	8/4/36	3/4/39
(I Blending/EQ3	166 wks	3/7/39	5/9/42



### **Path Forward**

- Signatory Meetings and Public Communications
- Capital Plan Development Process
  - Memorandum of Cooperation
  - 12/31/17 Plan submission to PADEP and USEPA
  - Project authorizations
- Start funding process
  - Partner funding and rate evaluations
  - LCA bonding and rate analyses
  - City bonding analyses





