



## **Administrative Orders: History and Current Status - Spring 2021**

The United States Environmental Protection Agency (EPA) issued Administrative Orders (AO) in 2007 and 2009 because of excessive Inflow and Infiltration (I&I) entering the collections systems of Allentown and the Sewer Signatories. These orders directed the parties to address the problems. In late 2017 through early 2018 there was a change in direction proposed by the EPA. EPA indicated that addressing the AO should be on maintenance and rehabilitation of collection systems. The City and Sewer Signatories met with EPA on March 23, 2018 to discuss the development of a regional flow management strategy.

City of Allentown, LCA, and other municipalities (Respondents) that contribute sewage to the facility worked collaboratively and submitted a Regional Flow Management Strategy (RFMS) to the EPA prior to the deadline of August 1, 2018. The RFMS describes the collaborative works that are planned to address ongoing management of sewer flows during wet-weather events.

The Respondents received a letter from the PaDEP on 12/21/2018 outlining their comments and concerns regarding the RFMS and requested information from the respondents by 3/31/2019. All Respondents gathered the requested information and sent in a response with additional questions regarding the RFMS to the PaDEP on 3/8/2019. EPA sent a letter on 3/19/2019 stating "Based on the regional flow management strategy and information provided in the semi-annual reports and meetings, EPA hereby finds that all of the Respondents to the Administrative Orders CWA-03-2009-0313DN and CWA-03-2007-0332DN have completed the requirements." This Letter indicates that the EPA accepts the RFMS as an acceptable plan to address the wet weather issues.

The City is following the plan and approved the design of five proposed I&I reduction projects. The construction of each of the projects will be completed on an annual basis. The first I&I project was completed in June 2020. In addition to these projects and as part of the RFMS, a system characterization study is scheduled to start in 2021.

Due to an extraordinary weather pattern which began in August 2018, there were four by-passes within four months at the KIWWTP since the submittal of the RFMS. By way of comparison, there were two bypasses where the hydraulic capacity was exceeded within the past six years. The 2018 wet-weather events had extreme rainfall rates with one delivering 2.42 inches of rain within a three-hour timeframe. In 2019 due to unprecedented rain falls between August 2018 - July 2019 KIWWTP exceeded its hydraulic permitted capacity for three consecutive months triggering the PaDEP Chapter 94 regulation requiring that when 3 consecutive months are exceeded an Act 537 plan is to be submitted to address the exceedance. The participating municipalities, including Allentown submitted anticipated additional flows for 2020 which PaDEP approved until the ACT 537 is submitted. The 537 Plan will address additional flows projected for 2021-2025. A hydraulic evaluation study of KIWWTP was completed which will be submitted to address the Part II permit hydraulic capacity exceedance. The next step is to evaluate future flows from 2025-2050 from participating municipalities, including Allentown and modeling of the current system to start developing options to address these additional flows. A future 537 Plan will be submitted to address these future flows.