pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

OCT 18 2016

Patrick Donovan
Maidencreek Township Authority
1 Quarry Road
Blandon, PA 19510

Re: 2015 Annual Wasteload Management (Chapter 94) Report
Maidencreek Township STP
NPDES Permit No. PA0070271
Maidencreek Township, Berks County

Dear Mr. Donovan:

The Department of Environmental Protection (DEP) has completed its review of additional information furnished by your consultant on October 12, 2016 in regards to the July 2015 organic overload at your treatment plant.

In consideration of the clarification regarding the cleaning at the James Hardie Plant, the Department is rescinding its letter dated September 13, 2016 that requested a Corrective Action Plan (CAP).

DEP appreciates your cooperation in meeting the Chapter 94 reporting requirements.

If you have any questions concerning this notice, please Aaron Baar at (717) 705-4791 or by email at abaar@pa.gov.

Sincerely,

Timothy K. Wagner
Environmental Group Manager
Clean Water Program

cc: Ontelaunee Township Municipal Authority
Systems Design Engineering, Inc.

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OCT 21 2016
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"A Passion for Engineering Excellence"
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October 12, 2016

Commonwealth of Pennsylvania
Department of Environmental Protection
South Central Region
909 Elmerton Avenue
Harrisburg, PA 17110

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7014 3490 0000 3582 9432

Attention: Ms. Maria D. Bebenek, P.E.
Program Manager
Clean Water Program

Re: Maidencreek Township Authority
Chapter 94 Report for 2015
Responses to PA DEP

Dear Ms. Bebenek:

On behalf of Maidencreek Township Authority (MTA), we offer the following responses to the Department's September 13, 2016 letter concerning the review of the 2015 Chapter 94 Report.

We respectfully request the reconsideration of the requirement that MTA submit a written corrective action plan and the restriction of new connections for the following reasons:

1. As noted in the e-mail dated March 22, 2016, the Authority Manager and the Plant Manager identified potential sampling issues due to the influent line being extremely flat with a slope of the minimum allowed by DEP design criteria. Grease buildup at the flowline is known to occur. The Authority plans to increase periodic cleaning of the influent line to eliminate the potential for an artificially inflated influent BOD sample which does not represent the true influent waste stream characteristic.

2. During July 2015, the exact month that the high reading occurred, the Owner of the James Hardie plant was in the process of selling their property and cleaned their warehouse floors and walls. The wash water was discharged to the sanitary sewer system via the floor drains. The user contacted the Authority and permission was given for minor discharge per day. The wash water was high in TSP and more than likely stripped the sewer lines and additional BOD entered the plant during the several days that the James Hardie building was cleaned. WWTP staff tested daily for Phosphorus during this event. Phosphorus is an analysis which can be performed in house with daily results. BOD_5 on the other hand, is a test that is handled outside the WWTP lab and results are not known for 2 weeks due to the nature of the test and reporting. The high levels of BOD_5 could not be detected in a timely manner.

3. The one month in 2016 that resulted in a one-month maximum of 1,645 lbs./day was a result of PA DEP asking the Authority to take the Giorgio flows during February until the WWTP at the Giorgio facility was approved by PA DEP to be placed back into operation. The Authority worked with PADEP and Giorgio to accept their waste stream to prevent ecological damage to the Willow Creek. The Authority staff provided a large effort to this avail and we believe it was successful.

4. The 2015 Chapter 94 report clearly shows that the one month of July 2015 is an extreme outlier of the statistical average. As such, the 5 year one-month organic ratio is a better indication of overload. Going back to 2005, there has been only one month where the maximum one-month exceeded the organic limit of 1,834 lbs/day and the next highest maximum was 1,497 lbs/day in 2011 (exception being the Giorgio event discussed above). The average of the past 10 years' average monthly organic load is 735 lbs/day and the average of the maximum monthly organic load is 1,215 lbs/day. The average of the peaking factor for the past 10 years is 1.65. The projected one-month organic load as reported in the 2015 Chapter 94 Report for year 2020 is 1,410 lbs/day with an average of 770.4 lbs/day.

5. The WWTP normally runs with the outer ring offline because the organic load into the plant is so low. The F:M ratio of the facility with all rings on line does not allow a sludge age of normal standards. $CBOD_5$ and NH_3 levels through this plant are normally below detection levels and non-detect. These treatment values do not occur on an organically overloaded plant.

From an engineering perspective the five (5) points identified above clearly explain that there are no defects, inadequacies or other issues with the WWTP that that indicate that future BOD overloads are imminent or even likely. In fact there is no evidence of a problem with the WWTP that suggests that the Plant is approaching a projected overload. Rather, based upon the facts reported above it is apparent that the high month influent BOD was due to sampling issues as well as discharges that are not typical of the domestic waste that the WWTP receives. Accordingly, a corrective action plan or connection restriction is overly restrictive and not warranted. Consequently, the Maidencreek Township Authority respectfully requests that this matter be discontinued and that MTA be permitted to continue with its normal monitoring as required by Chapter 94.

If you have any questions, please feel free to contact this office at (610) 916-8500.

Respectfully Submitted,
SYSTEMS DESIGN ENGINEERING, INC.

Gregory T. Unger, P.E.
President

Cc: Maidencreek Township Authority
Maidencreek Township
Ontelaunee Township
Dan Becker, Esq
File: 16-0466-0222

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