

DOCKET NO. D-2015-015 CP-1

DELAWARE RIVER BASIN COMMISSION

**Pennsylvania American Water Company
Norristown Water Filtration Plant New Process Water Discharge
Norristown Borough, Montgomery County, Pennsylvania**

PROCEEDINGS

This docket is issued in response to an Application submitted to the Delaware River Basin Commission (DRBC or Commission) by the Pennsylvania American Water Company (PAWC or docket holder) on June 9, 2015 (Application), for approval of a process water discharge from the docket holder's existing water filtration plant (WFP). The docket holder has submitted a National Pollutant Discharge Elimination System (NPDES) permit application for the project discharge to the Pennsylvania Department of Environmental Protection (PADEP). Review of the NPDES permit application by the PADEP is pending.

The Application was reviewed for addition of the project in the Comprehensive Plan and approval under Section 3.8 of the *Delaware River Basin Compact (Compact)*. The Montgomery County Planning Commission has been notified of pending action. A public hearing on this project was held by the DRBC on November 10, 2015.

A. DESCRIPTION

1. Purpose. The purpose of this docket is to approve a new intermittent discharge of up to 1.93 million gallons per day (mgd) of process water from the docket holder's existing 18.0 mgd Norristown WFP. The discharge will consist of clarifier supernatant that is currently recycled back to the head of the WFP. The WFP facilities will be modified to allow for the supernatant to be directed to an existing stormwater outfall on the Schuylkill River. There are no other modifications to the WFP treatment facilities proposed.

2. Location. The docket holder's WFP is located on West Washington Street in Norristown Borough, Montgomery County, Pennsylvania. The WFP proposes to discharge to the Schuylkill River at River Mile 92.47 - 24.5 (Delaware River - Schuylkill River) via proposed Outfall No. 001.

The project outfall is located in the Schuylkill River Watershed as follows:

OUTFALL NO.	LATITUDE (N)	LONGITUDE (W)
001	40 ° 06' 47.5"	75 ° 20' 57.7"

3. Area Served. The docket holder's WFP will continue to serve the Boroughs of Norristown and Bridgeport and portions of Lower Providence, West Norriton, East Norriton, Plymouth, Whitpain, Perkiomen, Upper Merion, Whitmarsh and Worchester Townships in Montgomery County, Pennsylvania.

For the purpose of defining the Area Served, Section B (Type of Discharge) and D (Service Area) of the docket holder's Application are incorporated herein by reference, to the extent consistent with all other conditions contained in the DECISION Section of this docket.

4. Physical features.

a. Design criteria. The docket holder's WFP will continue to treat up to 18.0 mgd of surface water for public water supply. Process wastewater containing residuals from the WFP treatment processes are treated via clarification. Clarifier supernatant is currently recycled back to the head of the WFP. The docket holder proposes to modify the WFP to allow for a new intermittent discharge of up to 1.93 mgd (maximum daily flow) of this clarifier supernatant to the Schuylkill River under certain conditions.

b. Facilities. The WFP treats raw intake surface water utilizing coagulation in two (2) tanks (primarily through ferric chloride addition), high-rate clarification in three (3) SuperPulsator clarifiers, filtering in a granulated activated carbon (GAC) filter unit, and chemical disinfection. Process wastewater from the treatment process consists of sludge blowdown from the SuperPulsator clarifiers and backwash water generated during the filter cleaning process. This process wastewater is directed to two (2) wastewater clarifiers, after which clarifier supernatant is recycled back to the head of the WFP, and sludge is directed to a sludge thickener, dewatered using plate and frame presses, and then sent off-site for disposal.

The project consists of modifying the WFP so that clarifier supernatant can be discharged to the Schuylkill River. A new pipeline will be constructed in order to direct the supernatant to an existing stormwater outfall (Outfall No. 001). The outfall is located approximately 200 feet upstream of the docket holder's surface water intake. Discharge will occur infrequently, at times when recycling the supernatant back to the head of the WTP would have a negative impact on the water treatment process or finished water quality. The two scenarios in which a discharge could occur are 1) when the clarifier supernatant may have a negative impact on the water treatment process or finished water quality, and 2) when recycle rates are greater than 10% of plant flow.

Several of the existing facilities are located in the flood hazard area. The existing facilities located in the flood hazard area are located outside the floodway, in the flood fringe, and are flood-proofed up to the flood protection elevation (100-year flood elevation plus one foot) since the elevations of the tops of the proposed tanks are above the flood protection elevation.

Waste sludge will continue to be hauled off-site by a licensed hauler for disposal at a state-approved facility.

c. **Water withdrawals.** The Norristown WFP withdraws surface water for public drinking supply from an intake on the Schuylkill River. The water withdrawal is described in detail in DRBC Docket No. D-1966-100 CP-1, which was approved on August 24, 1966.

d. **NPDES Permit / DRBC Docket.** The docket holder has submitted a NPDES permit application for the project discharge to the PADEP. Review of the NPDES permit application by the PADEP is pending. The following average monthly effluent limits and monitoring requirements are for DRBC parameters.

EFFLUENT TABLE A-1

OUTFALL 001 (Schuylkill River)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	Monthly
Total Suspended Solids	30 mg/l	Monthly
Total Dissolved Solids*	1,000 mg/l	Quarterly

* See Condition II.t. in DECISION section

e. **Relationship to the Comprehensive Plan.** The docket holder's WFP was added to the Comprehensive Plan via Docket No. D-1966-100 CP-1 on August 24, 1966. This docket add the WFP discharge to the Comprehensive Plan.

B. FINDINGS

This docket approves a new intermittent discharge of up to 1.93 mgd of process water from the docket holder's existing 18.0 mgd Norristown WFP. The WFP facilities will be modified to allow for clarifier supernatant to be directed to an existing stormwater outfall on the Schuylkill River. There are no other modifications to the WFP treatment facilities proposed.

At the docket holder's discharge location, the Schuylkill River has an estimated seven-day low flow with a recurrence interval of ten years (Q_{7-10}) of 217 mgd (336 cfs). The ratio of this low flow to the design wastewater discharge of 1.93 mgd is 112 to 1.

The nearest downstream surface water intake of record for public water supply is the docket holder's emergency intake located approximately 200 feet downstream of the project discharge on the Schuylkill River.

The project does not conflict with the Comprehensive Plan and is designed to prevent substantial adverse impact on the water resources related environment, while sustaining the current and future water uses and development of the water resources of the Basin.

The project is designed to produce a discharge meeting the effluent requirements as set forth in the Commission's *WQR*.

C. DECISION

I. Effective on the approval date for Docket No. D-2015-015 CP-1 below, the project discharge and the appurtenant facilities described in Section A “Physical Features” of this docket shall be added to the Comprehensive Plan.

II. The project and appurtenant facilities as described in Section A “Physical Features” of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

a. Docket approval is subject to all conditions, requirements, and limitations imposed by the PADEP in its NPDES permit, and such conditions, requirements, and limitations are incorporated herein, unless they are less stringent than the Commission’s.

b. The facility and operational records shall be available at all times for inspection by the DRBC.

c. The facility shall be operated at all times to comply with the requirements of the Commission’s *WQR* and Flood Plain Regulations (*FPR*).

d. The docket holder shall comply with the requirements contained in the EFFLUENT TABLES in Section A.4.d. of this docket. The docket holder shall submit the required monitoring results electronically to the DRBC Project Review Section via email aemr@drbc.state.nj.us on the **Annual Effluent Monitoring Report Form** located at this web address: <http://www.state.nj.us/drbc/programs/project/application/index.html>. The monitoring results shall be submitted annually, absent any observed limit violations, by January 31. If a DRBC effluent limit is violated, the docket holder shall submit the result(s) to the DRBC within 30 days of the violation(s) and provide a written explanation that states the action(s) the docket holder has taken to correct the violation(s) and protect against any future violations.

e. Except as otherwise authorized by this docket, if the docket holder seeks relief from any limitation based upon a DRBC water quality standard or minimum treatment requirement, the docket holder shall apply for approval from the Executive Director or for a docket revision in accordance with Section 3.8 of the *Compact* and the *Rules of Practice and Procedure*.

f. If at any time the receiving treatment plant proves unable to produce an effluent that is consistent with the requirements of this docket approval, no further connections shall be permitted until the deficiency is remedied.

g. Nothing herein shall be construed to exempt the docket holder from obtaining all necessary permits and/or approvals from other State, Federal or local government agencies having jurisdiction over this project.

h. Sound practices of excavation, backfill and reseedling shall be followed to minimize erosion and deposition of sediment in streams.

i. Within 10 days of the date that construction of the project has started, the docket holder shall notify the DRBC of the starting date and scheduled completion date.

j. Within 30 days of completion of construction of the approved project, the docket holder is to submit to the attention of the Project Review Section of DRBC a Construction Completion Statement (“Statement”) signed by the docket holder’s professional engineer for the project. The Statement must (1) either confirm that construction has been completed in a manner consistent with any and all DRBC-approved plans or explain how the as-built project deviates from such plans; (2) report the project’s final construction cost as such cost is defined by the project review fee schedule in effect at the time the application was made; and (3) indicate the date on which the project was (or is to be) placed in operation. In the event that the final project cost exceeds the estimated cost used by the docket holder to calculate the DRBC project review fee, the statement must also include (4) the amount of any outstanding balance owed for DRBC review. The outstanding balance will equal the difference between the fee paid to the Commission and the fee calculated on the basis of the project’s final cost, using the formula and definition of “project cost” set forth in the DRBC’s project review fee schedule in effect at the time application was made.

k. The facility modifications shall be completed within three years of approval of this docket or the docket holder shall demonstrate to the Executive Director that it has expended substantial funds (in relation to the cost of the project) in reliance upon this docket approval. If the modifications have not been completed within three years of Docket Approval and the docket holder does not submit a cost analysis demonstrating substantial funds have been expended, Commission approval of the modifications to the existing facility shall expire. If the docket expires under this condition, the docket holder shall file a new application with the Commission and receive Commission approval prior to initiating construction of any modifications.

l. The docket holder is permitted to treat and discharge wastewaters as set forth in the Area Served Section of this docket, which incorporates by reference Sections B (Type of Discharge) and D (Service Area) of the docket holder’s Application to the extent consistent with all other conditions of this DECISION Section.

m. The docket holder shall make wastewater discharge in such a manner as to avoid injury or damage to fish, wildlife, and/or other aquatic life and shall avoid any injury to public or private property.

n. No sewer service connections shall be made to newly constructed premises with plumbing fixtures and fittings that do not comply with water conservation performance standards contained in Resolution No. 88-2 (Revision 2).

o. Nothing in this docket approval shall be construed as limiting the authority of DRBC to adopt and apply charges or other fees to this discharge or project.

p. The issuance of this docket approval shall not create any private or proprietary rights in the waters of the Basin, and the Commission reserves the right to amend,

suspend or rescind the docket for cause, in order to ensure proper control, use and management of the water resources of the Basin.

q. Unless an extension is requested and approved by the Commission in advance, in accordance with paragraph 11 of the Commission's Project Review Fee schedule (Resolution No. 2009-2), the docket holder is responsible for timely submittal of a docket renewal application on the appropriate DRBC application form at least 12 months in advance of the docket expiration date set forth below. The docket holder will be subject to late charges in the event of untimely submittal of its renewal application, whether or not DRBC issues a reminder notice in advance of the deadline or the docket holder receives such notice. In the event that a timely and complete application for renewal has been submitted and the DRBC is unable, through no fault of the docket holder, to reissue the docket before the expiration date below (or the later date established by an extension that has been timely requested and approved), the terms and conditions of the current docket will remain fully effective and enforceable against the docket holder pending the grant or denial of the application for docket approval.

r. The Executive Director may modify or suspend this approval or any condition thereof, or require mitigating measures pending additional review, if in the Executive Director's judgment such modification or suspension is required to protect the water resources of the Basin.

s. Any person who objects to a docket decision by the Commission may request a hearing in accordance with Article 6 of the Rules of Practice and Procedure. In accordance with Section 15.1(p) of the Delaware River Basin Compact, cases and controversies arising under the Compact are reviewable in the United States district courts.

t. The docket holder may request of the Executive Director in writing the substitution of specific conductance for TDS. The request should include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow the substitution of specific conductance for TDS monitoring.

BY THE COMMISSION

DATE APPROVED: December 9, 2015

EXPIRATION DATE: December 9, 2020