DOCKET NO. D-1992-003 CP-4

DELAWARE RIVER BASIN COMMISSION

Pennsylvania American Water Company
Exeter Township Wastewater Treatment Plant
Exeter Township, Berks County, Pennsylvania

PROCEEDINGS

This docket is issued in response to an application submitted to the Delaware River Basin Commission (DRBC or Commission) on April 10, 2025 (Application), to renew the approval of the docket holder's existing wastewater treatment plant (WWTP) and its discharge. The Pennsylvania Department of Environmental Protection (PADEP) issued National Pollutant Discharge Elimination System (NPDES) Permit No. PA0026972 for this discharge. The PADEP issued Water Quality Management Permit No. 0692402 for this proposed upgraded facility.

The application was reviewed for continuation of the project in the Comprehensive Plan and approval under Section 3.8 of the *Delaware River Basin Compact*. The Berks County Planning Commission has been notified of pending action. A public hearing on this project was held by the DRBC on May 6, 2026.

A. DESCRIPTION

1. Purpose. The purpose of this docket is to approve an upgrade to the docket holder's existing 7.1 million gallons per day (mgd) WWTP and its discharge. The proposed upgrades are for compliance with a Corrective Action Plan and include modifications to the existing influent pumping station (IPS) and the addition of a new IPS with 6 mm screening, dual force mains, diversion chambers, and flow equalization tanks. Additionally, the docket holder applied with a request to approve a Total Dissolved Solids (TDS) variance increasing the monthly average effluent limit from 1,500 mg/l to 1,600 mg/l to maintain compliance with effluent limitations during periods of receipt of highly concentrated influent.

2. Location. The docket holder's WWTP is located on the east bank of the Schuylkill River, just off Hanover Road, in Exeter Township, Berks County, Pennsylvania. The WWTP will continue to discharge treated effluent to the Schuylkill River, at River Mile 92.5 – 65.3 (Delaware River – Schuylkill River).

The location of the WWTP outfall in the Schuylkill River Watershed is as follows:

OUTFALL NO.	LATITUDE (N)	LONGITUDE (W)
002 (WWTP Outfall)	40° 16' 33"	75° 50' 16"
001 (Inactive)	40° 16' 33"	75° 50' 13"

3. **Area Served**. The docket holder's WWTP will continue to serve Exeter, Alsace, and Lower Alsace Townships and Saint Lawrence Borough located in Berks County, Pennsylvania. For the purpose of defining the Area Served, the Type of Discharge and the Service Area sections from the docket holder's Application are incorporated herein by reference, to the extent consistent with all other conditions contained in Section C. DECISION of this docket.

4. **Design Criteria**. The docket holder's 7.1 mgd WWTP consists of two (2) treatment trains, the West Plant and the East Plant. Both plants utilize a two-stage activated sludge treatment process and when combined, are designed to treat an average annual flow of 7.1 mgd. The West Plant is designed to treat an average annual flow of 5.9 mgd and discharges via existing Outfall No. 002. The East Plant is designed to treat an average annual flow of 1.2 mgd; however, the East Plant is currently used for storage and equalization of industrial wastewater before discharging to the headworks of the West Plant for further treatment. When the East Plant is not solely used for storage and equalization of industrial wastewater, treated effluent can be discharged from the plant via existing Outfall No. 001 into receiving waters.

The WWTP is designed for an annual average flow of 7.1 mgd, and a hydraulic design capacity of 9.63 mgd.

5. **Facilities**. The WWTP facilities consist of two (2) treatment trains with the West Plant containing the main pumping station, headworks building with mechanical bar screen and grit chamber, four (4) primary clarifiers, two (2) 1st stage aeration tanks, three (3) 2nd stage aeration tanks, and four (4) secondary clarifiers. The disinfection process is achieved by sodium hypochlorite and dechlorination by sodium bisulfite. The East Plant consists of four (4) primary clarifiers, two (2) aeration tanks, and two (2) final clarifiers.

Currently, the East Plant receives industrial wastewater (mostly landfill leachate) for storage and equalization prior to being introduced to the headworks of the West Plant on a controlled basis. The West Plant receives this equalized industrial wastewater from the East Plant along with residential, commercial, and industrial wastewater from the WWTP sewer service area. There is no current plan to use the East Plant for treatment and discharge via Outfall No. 001 to receiving waters.

Treated wastewater effluent from the West Plant is discharged via existing Outfall No. 002, which features a multi-port diffuser and discharges approximately to the middle of the Schuylkill River channel.

Sludge handling facilities consist of a sludge gravity thickener, two (2) anaerobic digesters, an aerated sludge holding tank, two (2) centrifuges, two (2) sludge drying beds, and a non-contact thermal dryer.

The proposed facilities consist of a new IPS with a 6 mm influent screen, dual 24-inch diameter force mains, new diversion chambers, and three (3) new flow equalization tanks. The existing IPS will be used to manage flow during dry weather conditions. A 3 mm screen will be installed at the headworks building to improve the plant's screening capabilities. Several structures will be demolished to facilitate new infrastructure including the East Plant grit removal facility, primary clarifiers, intermediate clarifiers, and aeration tank.

Wasted sludge will continue to be hauled off-site for disposal in accordance with the NPDES Permit No. PA0026972.

Several of the project facilities are located in the 100-year floodplain, however, the facilities with proposed modifications are at a higher elevation than that of the 100-year flood.

6. **Water Withdrawals**. The potable water supply in the project service area is provided by groundwater wells and surface water withdrawal. The potable water supply is described in detail in Docket Nos. D-1999-030 CP-6, D-1969-161 CP, and D-2000-059 CP-3, which were approved on September 10, 2025, October 28, 1969, and March 10, 2021 respectively.

7. **NPDES Permit / DRBC Effluent Requirements**. NPDES Permit No. PA0026972 issued by the PADEP includes final effluent limitations for the project discharge to surface waters classified by the PADEP as supporting migratory fishes (MF) and warm water fishes (WWF). EFFLUENT TABLES C-1 & C-2 included in Section C. DECISION condition C.1. of this docket, contain effluent requirements for DRBC parameters that must be met as a condition of this approval. Effluent requirements for the WWTP are based on a combined discharge rate of 7.1 mgd from existing Outfall Nos. 001 and 002 (1.2 mgd from Outfall No. 001 and 5.9 mgd from Outfall No. 002).

8. **Relationship to the Comprehensive Plan**. The existing WWTP was included in the Comprehensive Plan via DRBC Resolution No. R-64-10 and renewed and/or modified by Docket Nos. D-1975-102 CP-1, D-1985-046 CP-1, D-1991-037 CP-1, D-1992-003 CP-1, D-1991-003 CP-2, and D-1992-003 CP-3 on July 23, 1975, July 24, 1985, August 14, 1991, December 9, 1992, June 15, 2016, and December 9, 2020, respectively. Issuance of this docket (D-1992-003 CP-4) will continue the WWTP and its discharge in the Comprehensive Plan.

B. FINDINGS

The docket holder applied for approval of upgrades to their existing 7.1 mgd Exeter Township WWTP for the purpose of complying with a Corrective Action Plan. The upgrades consist of the construction of an additional IPS, dual force mains, diversion chambers, and flow equalization tanks. The docket holder included in the application a request for a TDS variance to increase the monthly average effluent limit from 1,500 mg/l to 1,600 mg/l in order to maintain compliance.

1. Total Dissolved Solids (TDS)

Section 4.10.4.D.2 of the Commission's Water Quality Regulations (WQR) states the following:

"Total dissolved solids shall not exceed 1000 mg/l, or a concentration established by the Commission which is compatible with designated water uses and stream quality objectives, and recognizes the need for reserve capacity to serve future dischargers."

The Commission's basin-wide in-stream TDS criteria is that the receiving stream's resultant TDS concentration be less than 133% of the background (WQR 3.10.3.B.1.b.) and the receiving stream's resultant TDS concentration be less than 500 mg/l (WQR 3.10.3.B.2.). The discharge is required to comply with the more stringent of the above in-stream criteria. The 133% of the background TDS requirement is for the protection of aquatic life. The 500 mg/l TDS requirement is to protect the use of the receiving stream as a drinking water source. The EPA's Safe Drinking Water Act secondary standard for TDS is 500 mg/l.

On July 15, 2016, the DRBC approved Docket No. D-1992-003 CP-2 which included a TDS determination consisting of an average monthly TDS effluent limit of 1,500 mg/l for Outfall No. 002. Docket No. D-1992-003 CP-3, approved on December 9, 2020, continued the average monthly effluent limit for TDS of 1,500 mg/l.

In the application for this docket renewal, the docket holder requested a modification to the existing TDS variance to increase the monthly average limit from 1,500 mg/l to 1,600 mg/l. The requested increase is to maintain compliance during periods when the WWTP receives influent with high TDS, notably from their existing sources of permitted industrial users, in-basin hauled waste, and collection system influent that are estimated to account for 24%, 9%, and 62% of the average TDS received at the WWTP, respectively.

DRBC Resolution No. 91-9 states the following:

"It is the policy of the Commission to give no credit toward meeting wastewater treatment requirements for importations of wastewater. An effluent loading or concentration authorized in accordance with a water-quality-based effluent limit such as a wasteload allocation may not include loadings attributable to an importation of wastewater."

The Commission offers no credit for the importation of wastewater that Exeter Township receives; however, it recognizes the high TDS concentration of the influent received from within the WWTP's service area within the basin and that the importation of wastewater has a minimal effect on the WWTP's overall TDS concentration. The historical data provided by the docket holder indicates that in-basin waste streams account for 95.4% of the TDS in the influent accepted by Exeter Township, while out-of-basin waste streams account for just 4.6% of the total TDS in the influent. Additionally, this docket continues the condition that the docket holder's WWTP is not permitted to accept for treatment and discharge 50,000 gallons per day or more (from all combined sources) of wastewater that is imported from outside the Delaware River Basin (see Section C. DECISION Condition C.2.). This docket condition will limit the impact of imported wastewater on the TDS concentration at the WWTP by limiting the amount of wastewater imported to the WWTP.

WWTP influent data indicates the average TDS concentration from May 1, 2024 to July 31, 2025 was 1,128 mg/l, with a maximum monthly TDS concentration of 1,540 mg/l. The WWTP does not have the treatment technology available to reduce TDS from influent before discharge.

Based on a review of the historical data, the WWTP effluent potentially exceeds a monthly average effluent limit of 1,500 mg/l, but would likely not exceed a monthly average effluent limit of 1,600 mg/l. DRBC staff performed calculations to evaluate compliance with the Commission's basin-wide in-stream TDS criteria using a maximum concentration of 1,600 mg/l TDS and a hydraulic design capacity of 8.43 mgd for the active Outfall No. 002.

According to the PADEP, the estimated seven-day low flow with a recurrence interval of ten years ($Q_{7\text{-}10}$ flow) of the Schuylkill River at USGS Gage No. 01471510 (Schuylkill River at Reading, which is upstream of the WWTP outfall) is 272 cfs (176 mgd). DRBC estimated the Schuylkill River in-stream TDS concentration based on available data compiled from two available sources: 1) the United States Geological Survey (USGS) National Water Information System (NWIS) and 2) the US EPA's STORET database. Based on the available data, the estimated background TDS concentration in the Schuylkill River upstream of the WWTP outfall is 351 mg/l. 133% of 351 mg/l is 466.8 mg/l; therefore, the DRBC in-stream requirement of 133% of background remains the more stringent of the two Commission in-stream requirements.

Based on the estimated background TDS concentration in the Schuylkill River of 351 mg/l, the $Q_{7\text{-}10}$ flow of the Schuylkill River of 176 mgd, active Outfall No. 002's hydraulic design capacity of 8.43 mgd, and a maximum effluent TDS concentration of 1,600 mg/l, the TDS in the Schuylkill River would be raised to 408.2 mg/l during $Q_{7\text{-}10}$ flows. If the WWTP were to discharge from the WWTP under these conditions, the WWTP flow would raise background TDS to 116%.

DRBC staff determined the discharge to be compatible with the Commission's designated water uses and water quality objectives in conformance with DRBC Water Quality Regulations since the in-stream concentrations in the Schuylkill River are not expected to exceed the US EPA's Safe Drinking Water Act's secondary standard of 500 mg/l for TDS nor exceed the Commission's criteria of 133% of background as a result of the facility discharge. Therefore, the request for an increase in the monthly average effluent limit for TDS from 1,500 mg/l to 1,600 mg/l is approved via this docket.

2. Hauled-in Waste

The docket holder's WWTP accepts hauled-in industrial wastewater, which primarily consists of landfill leachate from nearby landfills, currently from the following sources:

In-Basin: Reading, Birdsboro, Myerstown, and East Greenville, PA
Out-of-Basin: Morgantown, East Earl, and West Chester, PA

This docket does not authorize the docket holder to accept for treatment and discharge at the WWTP 50,000 gallons per day or more (from all combined sources) of wastewater that is imported from outside the Delaware River Basin. Prior to accepting for treatment and discharge 50,000 gallons per day or more (from all combined sources) of wastewater that is imported from outside the Delaware River Basin, the permittee shall first apply to and obtain approval from the Delaware River Basin Commission (See Section C. DECISION Condition C.2.).

3. Other

At the docket holder's WWTP discharge, the Schuylkill River has an estimated seven-day low flow with a recurrence interval of ten years ($Q_{7\text{-}10}$) of 176 mgd (272 cfs). The ratio of this low flow to the hydraulic design wastewater discharge rate from the 7.1 mgd WWTP is 18.3 to 1 (176 mgd/9.63 mgd).

The nearest surface water intake of record for public water supply is located on the Schuylkill River approximately 9 River Miles downstream of the docket holder's WWTP and is operated by Pottstown Borough Authority.

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 effluent limits in the NPDES Permit conform with Commission effluent quality requirements, where applicable.

The project is designed to produce a discharge that meets the effluent requirements as set forth in the Commission's *Water Quality Regulations* (*WQR)*.

C. DECISION

Effective on the approval date for Docket No. D-1992-003 CP-4 below, the project described in Docket No. D-1992-003 CP-3 is removed from the Comprehensive Plan to the extent that it is not included in Docket No. D-1992-003 CP-4; Docket No. D-1992-003 CP-3 is terminated and replaced by Docket No. D-1992-003 CP-4; and the project and the appurtenant facilities described in Section A "DESCRIPTION" of this docket shall be included in the Comprehensive Plan. The project and appurtenant facilities as described in Section A of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

Monitoring and Reporting

1. The docket holder shall comply with the requirements contained in the EFFLUENT TABLES below. The docket holder shall submit the required monitoring results electronically to the DRBC Project Review Section via email **aemr@drbc.gov** on the **Annual Effluent Monitoring Report Form** located at this web address: https://www.nj.gov/drbc/programs/project/docket-app-info.html#3. 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. The following average monthly effluent limits are among those listed in the NPDES Permit and meet or are more stringent than the effluent requirements of the DRBC.

EFFLUENT TABLE C-1: DRBC Parameters Included in NPDES Permit

OUTFALL NOS. 001 & 002 (Schuylkill River)		
PARAMETER	**LIMIT**	**MONITORING**
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit
Total Suspended Solids	24.4 mg/l	As required by NPDES Permit
$CBOD_5$ (at 20° C)	20.3 mg/l	As required by NPDES Permit
Ammonia Nitrogen (5-1 to 10-31) (11-1 to 4-30)	7.1 mg/l 20 mg/l	As required by NPDES Permit
Fecal Coliform (5-1 to 9-30) (10-1 to 4-30)	200 colonies per 100 ml as a geo. avg. 2000 colonies per 100 ml as a geo. avg.	As required by NPDES Permit
Total Dissolved Solids*	1,600 mg/l*	As required by NPDES Permit

*The NPDES Permit lists the monthly average effluent limit of TDS as 1,500 mg/l. This Docket approves the request to increase the monthly average effluent limit for TDS from 1,500 mg/l to 1,600 mg/l. See Condition C.6.

The following monitoring requirements and average monthly effluent limits are for DRBC parameters not listed in the NPDES Permit.

EFFLUENT TABLE C-2: DRBC Parameters Not Included in NPDES Permit

OUTFALL NOS. 001 & 002 (Schuylkill River)		
PARAMETER	**LIMIT**	**MONITORING**
$CBOD_5$ (at 20° C)	85% minimum removal	Monthly

2. To determine if there is any potential for effluent true color to exceed 100 units on the platinum cobalt scale, the docket holder is required to perform quarterly true color effluent monitoring for 2 years (8 total tests) from date of this docket.

Other Conditions

3. The docket holder is not permitted to accept for treatment and discharge at the WWTP, 50,000 gallons per day or more (from all combined sources) of wastewater that is imported from outside the Delaware River Basin. Prior to accepting for treatment and discharge 50,000 gallons per day or more (from all combined sources) of wastewater that is imported from outside the Delaware River Basin, the permittee shall first apply to and obtain approval from the Delaware River Basin Commission.

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

5. 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*.

6. The docket holder may request permission from the Executive Director to perform specific conductance monitoring in lieu of TDS monitoring. The request shall be made in writing and shall include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow specific conductance monitoring in lieu of TDS monitoring.

7. This approval shall expire on the expiration date set forth below unless prior thereto the docket holder has applied to the Commission to renew or extend this approval.

8. The docket holder is responsible for timely submittal to the DRBC of a docket renewal application on the appropriate application form including the appropriate docket application filing fee (see 18 C.F.R. 401.43) at least 6 months in advance of the docket expiration date set forth below. The docket holder will be subject to late filed renewal surcharges in the event of untimely submittal of its renewal application, whether DRBC issues a reminder notice in advance of the deadline or the docket holder receives such notice. If 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, the terms and conditions of the current docket will remain fully effective and enforceable pending the grant or denial of the application for docket approval.

9. The docket holder is permitted to treat and discharge wastewater as set forth in the Area Served Section of this docket, which incorporates by reference the Type of Discharge and Service Area sections of the docket holder's Application to the extent consistent with all other conditions of this section. Any expansion of the area served beyond that included in Section A.3. Area Served is subject to DRBC review and approval in accordance with Section 3.8 of the Compact.

10. In accordance with the Commission's regulations at 18 C.F.R. Part 440, the docket holder is prohibited from discharging wastewater from high volume hydraulic fracturing ("HVHF") or HVHF-related activities to waters or land within the Basin. Violation of this or any condition of this docket approval may result in enforcement, including the risk of financial penalties, pursuant to Section 14.17 of the Delaware River Basin Compact and Section 2.7.8 (18 CFR 401.98) of the Commission's Rules of Practice and Procedure.

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

12. The facility shall be operated at all times to comply with the requirements of the Commission's *WQR*.

13. 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.

14. 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.

15. The docket holder shall discharge wastewater in such a manner as to avoid injury or damage to fish or wildlife and shall avoid any injury to public or private property.

16. 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).

17. 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, to ensure proper control, use and management of the water resources of the Basin.

18. The docket holder shall be subject to applicable DRBC regulatory program fees, in accordance with duly adopted DRBC resolutions and/or regulations (see 18 C.F.R. 401.43).

19. This approval is transferable by request to the DRBC Executive Director provided that the project purpose and area served approved by the Commission in this docket will not be materially altered because of the change in project ownership. The request shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 C.F.R. 401.43).

20. The docket holder shall request a name change if the name of the entity to which this approval is issued changes its name. The request for name change shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 C.F.R. 401.43).

21. 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.

22. 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 (RPP)*. 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.

BY THE COMMISSION

APPROVAL DATE: **June 11, 2026**

EXPIRATION DATE: **October 31, 2034**