



CITY OF ALLENTOWN

No. \_\_\_\_\_

**RESOLUTION**

**R113 - 2025**

***Introduced by the Administration on August 20, 2025***

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Resolution Adopting the Updates to the Regional Act 537 Plan,  
Lehigh County, which includes the City of Allentown,  
and its Submission to the Pennsylvania Department of Environmental Protection

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***Resolved by the Council of the City of Allentown, That***

**WHEREAS**, Section 5 of the Act of January 24, 1966, P.L. 1535, No. 537, known as the "Pennsylvania Sewage Facilities Act," as amended, and the Rules and Regulations of the Department of Environmental Protection (Department) adopted thereunder, Chapter 71 of Title 25 of the **Pennsylvania Code**, requires the municipality to adopt an Official Sewage Facilities Plan providing for sewage services adequate to prevent contamination of waters and/or environmental health hazards with sewage wastes, and to revise said plan whenever it is necessary to meet the sewage disposal needs of the municipality, and

**WHEREAS**, ARRO Consulting has prepared a Regional Act 537 Plan (Plan) which provides for sewage facilities in the City of Allentown, and

**WHEREAS**, the alternative of choice to be implemented includes the following seven (7) items:

1. Flow Characterization Study to be completed in approximately five (5) years from the Plan approval date, which will be used to prepare and submit Act 537 Special Study(s) in support of future projects currently described in the Plan as "master plan" projects.
2. Negotiation and possible execution of new Intermunicipal Agreements (IMAs) that address cost-sharing for current and future projects and operations and maintenance costs, with an emphasis on flow-based billing methodologies to incentivize inflow and infiltration (I&I) removal efforts. The new IMAs may also address regional collaboration on I&I projects, and consideration of a regional surcharge program for high-strength dischargers, and other matters outlined in the term sheet included in the Plan.
3. Regular reporting of the results of the I&I program(s), which will include a report of projects completed and leakage removed, updated evaluations of the 120/275 gallons-per-capita-per-day EPA benchmark for excessive I&I, and an assessment of the cost-effectiveness of the program. It is expected that the program goals will be considered as having been met when this reporting indicates absence of excessive I&I at the Kline's Island Wastewater Treatment Plant (KIWWTP) consistent with the 120/275 gallons-per-capita-per-day EPA benchmark.
4. Continued Connection Management Plan under the Department of Environmental Protection's direction, which recognizes the value of captured capacity via I&I source reduction to support new

connections to the system. It is expected that this Connection Management Plan will be discontinued when the remaining commitments listed below have been achieved.

5. Continued I&I source reduction efforts based on the 2021 Flow Characterization Study and any future Sanitary Sewer Evaluation Studies (SSES) work described in each municipality's I&I Source Reduction Plan, which will be used to further prioritize projects during the Plan period.

6. Sewage billing meter program implementation that includes continuous data validation and data capture in a read-only combined portal for municipal access to real-time flow data. The focus of the metering program will be to ensure accurate flow monitoring at the municipality level.

7. Completion of the KIWWTP pump replacement and upgrade project, which is currently in the design and permitting stages and will increase the plant's capacity to manage peak wet-weather flows. A post-construction evaluation of project performance will be conducted, including a review of treatment plant bypass activations and volume of discharges.

**WHEREAS**, the key implementation activities will be completed over the next five (5) years, and

**WHEREAS**, the City of Allentown finds the Plan described above conforms with the city's comprehensive plan – Allentown Vision 2030 – as well as the current ordinances on zoning, subdivision, other relevant municipal ordinances and plans as well as programs on pollution control and water quality management.

**NOW, THEREFORE, BE IT RESOLVED** by the Council of the City of Allentown hereby adopts and submits to the Department of Environmental Protection for its approval as a revision to the "Official Plan" of the City of Allentown the above referenced Plan. The City of Allentown hereby assures the Department of the complete and timely implementation of the said plan as required by law. (Section 5, Pennsylvania Sewage Facilities Act as amended).

## Legislative Template

- What department or bureau is this bill originating from?
  - Department of Public Works, and Department of Community and Economic Development
- Summary and facts of the bill.
  - Section 5 of the Act of January 24, 1966, P.L. 1535, No. 537, known as the “Pennsylvania Sewage Facilities Act,” as amended, and the Rules and Regulations of the Department of Environmental Protection (Department) adopted thereunder, Chapter 71 of Title 25 of the Pennsylvania Code, **requires the municipality to adopt an Official Sewage Facilities Plan (Plan) providing for sewage services adequate to prevent contamination of waters and/or environmental health hazards with sewage wastes, and to revise said Plan whenever it is necessary to meet the sewage disposal needs of the municipality**
- Purpose – Please include the following in your explanation:
  - a. What does the bill do?
    - i. Pennsylvania Code requires the municipality to adopt a Plan providing sewage services.
  - b. What are the benefits of doing this?
    - i. Ensures the City is following PA regulation for maintaining sewage facilities to prevent contamination of waters and/or environmental health hazards with sewage wastes. Also ensures continued economic development within the City.
  - c. How does this bill relate to the City’s vision/mission/priorities?
    - i. The Bill conforms with the city’s comprehensive plan – Allentown Vision 2030, the current ordinances on zoning, subdivision, other relevant municipal ordinances and plans. The bill also conforms with programs on pollution control and water quality management.
- Financial Impact – Please include the following in your explanation:
  - a. Cost (initial and ongoing)
    - i. City will recover costs for developing the Plan from the sewage ratepayers. Sewage ratepayers will be responsible for improvements within the Plan.
  - b. Benefits (initial and ongoing)
    - i. The revised Plan is necessary to meet the sewage disposal needs and provides assurance of continued economic development for the City.
- Funding Sources – Please include the following in your explanation:
  - a. If transferring funds, please make sure to give specific account names and numbers. If appropriating funds from a grant, please list the agency awarding the grant.
    - N/A

- Priority status – Are there any deadlines to be aware of?
  - The region anticipates submitting the plan in October, 2025. Fourteen other municipalities connected to the City's sewage system will all need to approve the Plan. After the approval of the Resolutions, the Plan will be submitted to Department of Environmental Protection for approval. Any delay could impact the requirements set forth in the PA Regulation and delay our regional partners' sewage Plan revisions.
- Why should Council unanimously support this bill?
  - Supporting the bill ensures adequate sewage services preventing contamination of waters and/or environmental health hazards with sewage waste. The bill also provides assurance of continued economic development for the City.