



Minutes - Final

Water and Sewer Compliance Review Board

Tuesday, May 23, 2017

5:00 PM

Council Chambers

Call to Order: Chairperson MacLean, Bartol, Guridy, Khanwalkar

[15-1627](#) 2016 Concession Lease Annual Report

Attachments: [2016 Concession Lease Annual Report](#)
[2016 Compliance Annual Report PowerPoint Presentation wo](#)

Mr. Brian Chamberlain stated the Compliance Office will provide an overview of LCA's Compliance relative to the compliance of the Concession Lease Agreement. It covers a period from January - December 2016. LCA is required to demonstrate its adherence to the requires to the Lease and Operations Standards. We review all submissions to determine, and verify all confirmed that the requirements of the Lease are being followed. The city must meet regulatory requirements included in the permits. Our office consults with LCA and the regulatory requirements regarding these conditions. The wastewater plant is designed to treat 40 million gallons a day. The plant is staffed 24 hours a day, seven days a week. A bypass occurred at the wastewater treatment on February 24, 2016 due to a mechanical problem and excess flow. LCA is required to track and report if they receive any odor complaints. No odor complaints in 2016. The wastewater treatment plants neptis permit is in its third draft. It was posted for public comment in October 2016 and a Joint Reponses Letter from the City and LCA was submitted and still under review by the DEP. The DEP conducted an inspection at the wastewater treatment plant on August 1, 2016. No violations or corrections were noted in the inspection report. The US Army Core of Engineers conducted an inspection of Allentown Federal Flood Risk Management Project along the Lehigh River and received an overall unacceptable rating. LCA is conducting maintenance activities in Spring 2017 in preparation for the June 13th site inspection. It was vegetation the grew in the dike area that they wanted it cleaned out.

Ms. Arundhati Khanwalkar asked how does the city make sure that those excess are not causing problems for the city.

Mr. Brian Chamberlain stated that there is a pretreatment quote at the plant. They follow the protocols for the EPA.

Ms. Arundhati Khanwalkar stated that is what the industries are doing when they are putting their discharges into the system. How does the city make sure that does not cause a problem for the city?

Mr. Brian Chamberlain stated that there are permit perimeters that requires a certain limit. They suppose to do corrective action for that exceedances.

Mr. Dan Koplisch stated that they are reporting violations. Each permit is specialized depending on what the industry does. They are required to correct it.

Mr. Brian Chamberlain stated that the Allentown Sewage Collection System consists of 285 miles of pipes, and 7100 manholes. Maintenance is required. Collection system maintenance is an important aspect of the Lease. It prevents surcharges, and sanitary system overflows. Typical issues encountered in the system includes blockages created by tree roots and solidified grease.

Ms. Jennifer McKenna stated that we reviewed the wastewater collection systems. This part of the program is about drinking water and distribution system. In 2016, approximately, 48 percent of the finished water originated from the springs. Less than one percent was drawn from the Lehigh River.

Mr. John Bartol asked Ms. McKenna stated she mentioned the chlorination buster project now provides continuous disinfection during a power outage. Was there a battery backup involved or two locations on the grid.

Ms. Jennifer McKenna stated that the battery backup is part of the project.

Dr. David McGuire asked if the presentation is in here.

Ms. Jennifer McKenna stated that what we done is try to make this prettier and easier than the report, with more graphics. It is an overview. It is more detail in our report.

Mr. Brian Chamberlain stated that the graphs are in there.

Mr. Roger MacLean asked if the PowerPoint is available to everybody.

Ms. Jennifer McKenna stated that is correct. She asked Dr. McGuire if he would like to blend it into one report.

Dr. David McGuire stated that he needs it for people this year.

Mr. Dan Koplish stated that the Report is written so basically it is toned down. There are technical aspects. Most lay people can read through the annual report and extract the information. The reports themselves that LCA submits are available.

Ms. Jennifer McKenna stated that the Partnership for Safe Water is an alliance of six organizations which includes the American Waterworks Association and EPA. The water filtration plant has been participating in the partnership optimization plan for many years. The plants combined filtered turbidity for 2016 was well below both the state and the partnership requirements, averaging about .036 ETU. For 2016, no maximum containment level was succeeded. LCA flushes the entire system per pre-determined schedule in order to ensure the presence of proper chlorine residual levels. It helps to minimize stagnation and the formation of disinfection by-products. Disinfection by-products are monitored on a quarterly basis. In 2016, there were no boil advisories issued. LCA must perform leak detection on at least 110 miles of the distribution system annually. In 2016, they surveyed 214 miles of pipe. Over 106 million gallons of water saved through detection and repair efforts. Regulated lead and copper monitoring of 50 Tier I sites occurred June through September in 2016. Samples were collected from homes which met certain criterias such as having a lead service line. Results were submitted to DEP in October 2016. The 90th percentile results for lead was nine parts per billion. The actionable level is 15. The 90th percentile for Copper was .240 and the action level is 1.3. No action levels were exceeded. In 2016, LCA exercised over 2,000 valves. They repaired 52 valves and 28 valves were replaced. Approximately, 1800 fire hydrants are present throughout the city which must be serviceable at all times. LCA is expected to inspect and test 900 annually. They repaired 109 hydrants and replaced 19 hydrants. A total of 4.41 miles of main were replaced in 2016. There were 21 main breaks in 2016, 12 of which were spuncast. The hostatank was rehabilitated in 2016 and it included the rehabilitation of mixing system, painting or coating the interior surfaces. The Lease requires that LCA maintain a Customer Service Center and they chosen to locate that at the filtration plant on Martin Luther King. There are five customer services representatives, two of whom speaks Spanish to service the residents. They are required to conduct a survey to meet and measure customer satisfaction. They surveyed over 4,000 and only 404 were returned. Of those results 88 percent were listed as satisfied or very satisfied. Eighty - two percent of the calls were about billing or credit card payments. If customers find their way to the Compliance Office, we encourage them to first contact LCA to make sure their initial concerns are satisfied. The next step is to contact our office. In 2016, we fielded only 17 calls. That is a 35 percent decrease from 2015. The Capital Program was designed to ensure that there is a process in place. We follow conceptual design to

complete then we are regularly informed and go to meetings concerning concerns and get updates monthly and finally a project closeout. Capital Projects fall into two categories and they are listed separately on the ratepayers bill. It is major capital and AO (Administrative Order). There were two major capital projects that were included in the 2017. One was the water main project. They completed 2.10 miles. There were seven locations throughout the city. One in the north, two on the southside, and four on the westend. They replaced aging equipment from the 60s and 70s.

Ms. Arundhati Khanwalkar asked if Ms. McKenna can explain what the category of seven means.

Ms. Jennifer McKenna stated that was designed in the Lease. Schedule 7 Projects were considered important to be completed and are listed separately in the Lease. LCA has to complete them by a certain timeframe.

Mr. Brian talked about the Administrative Orders. EPA issued Administrative Orders back in 2007 and 2009 as a result of excessive inflow and infiltration. A formal extension letter was sent to the EPA back in November 2014, on October 14, 2015 EPA responded to the request with an order extension on consent. All respondents signed the consent on February 10, 2016 which provides an extension to the end of this year.

Ms. Arundhati Khanwalkar asked are we on track to meet the December deadline. She asked if there was a schedule that we can look at to see what we needed to be done by when, the steps that need to be taken and where we are with all that.

Mr. Dan Koplisch stated that the extension is required by December 31, 2017. The city provided EPA with a schedule which basically is a 20-year, two page program.

Mr. Brian Chamberlain stated that these are examples of infiltration and inflow. Typically, infiltration is the pipe entering a joint or broken sewer main. The inflow goes directly into the sewer. That would be a direct inflow. The second category for projects listed on a ratepayers bill for administrative order projects that are related to expenses show a manhole rehabilitation projects. In 2016, 151 manholes was rehabilitated. Security is a significant concern because of potential health risks to the public. It includes gates, cameras, perimeter checks, and facility sign-in logs. One security breach was reported in 2016. On August 23, three individuals made their way to the water infiltration property which they throw two rakes and a chair into the creek. It was caught on camera and filed with the police.

In June 2016, the PADP issued a monitoring and reporting violation for failure to submit results of a water test to the state in the required reporting period. LCA responded to the violation by submitting the missing data. LCA received a partnership for safe water director award in 2016 for optimization of drinking water treatment processes as determined by the filtered data collected throughout the year.

Mr. John Bartol stated that congratulated Lisa and her staff. It is not only for 2016 that is a ten year director's award.

Mr. Brian Chamberlain stated that they regularly add new information to the city's website. You can navigate to Compliance and find links to LCA, DEP, and EPA. He thanked Council for their time and gave a special thanks to their former colleagues Angela DiBuo. She is now the MS4 Coordinator. She helped us with this report.

Ms. Arundhati Khanwalkar stated that she had a few other questions. She asked about on Page 6 about leachate under the hauled waste which is 6,357,160 gallons of leachate that we accepted. She asked leachate from where. Is it a requirement that it is treated before it gets to us? What types of pollutants might be in the leachate? What does our MPDS permit says about taking on this leachate? How do we know this landfill leachate is not introducing pollutants that we are not even testing. She asked about the joint response to the draft permit. What were the issues that we raised in our response? She asked if the draft permit and our response to it available on the city's webpage? She stated on page 23, is this a typo. Just above the Security it says "as of the completion of the 2017 program, approximately 410 Manholes have with been retrofitted with either collars or water-tight covers; consequently, all manholes with site history of SSOs or surcharging, or identification thru inspections, or predicted by modeling through the year 2040 were addressed. Are we speaking of the 2016 program instead? She asked if the 2017 program is complete. It should have been will have been retrofitted and will have been addressed.

Mr. Brian Chamberlain stated that the leachate is from Waste Management. It is a land fill in Penn Argyl. It is a permitted industry. We have been receiving leachate for many years. He stated that the priority pollutant scan has 200 or so. Typically every five years. That is the requirement of the permit is to have a priority pollutant scan. When they do come in they get tested for the BOD. He stated that one issue could have been metals. Our current permits don't have any metal limits.

Ms. Dan Koplish stated that they can make it available. It is a public document. The response is fairly technical. It is prepared by engineers and lawyers. He stated that it is a program that started in 2014 and it is

going to be completed in 2017. He stated that he thinks it is a total of 410 manholes.

Ms. Jennifer McKenna stated that it is not a typo. We wanted to give you a summary of where we were going to be.

Mr. John Bartol stated that on Page 11, has DEP changed their inspection frequency. It states that it wasn't an inspection at the Plant in 2016.

Mr. Brian Chamberlain stated that even the wastewater plant was at heavily inspected than it is now.

Mr. Dan Koplish stated that his suspicion is that it is manpower. In the media and the DEP website, manpower was an issue.

Mr. John Bartol asked if the distribution system was inspected either because they usually does that at the same time.

Dr. David McGuire talked about Page 6, hauled wastes the question was asked and answered what is the leachate. He asked if this is in the bottom of the whole water treatment where it gets into the wastewater treatment plant. It is hauled to the wastewater treatment plant. What analysis goes to the upper end of the system. The waste from the Brewery is treated how far from the Brewery. He asked about septic sewage that is brought in and is there any testing of that.

Mr. Brian Chamerlain stated that leachate is trucked in. This is from rain water from the landfill. He stated that it is a mile away from the pre-treatment plant.

Mr. Dan Koplish stated that the industries that they are talking about are 37 industries which are categorical or someday the discharge might be some significance. LCA conducts on every signatory, South Whitehall Township, Coplay, and Whitehall. They collect samples on a quarterly basis. They are based on those perimeters. They are test for organic chemicals. The perimeters are not routinely checked for.

Mr. Brian Chamberlain stated that they accept hauled waste there. The pretreatment plant has an industrial permit which has certain requirements that they have to meet.

Mr. Dan Koplish stated that they are treated just like any other industry. They provide pre-treatment to the industries out there. They pre-treat their waste. He stated that it is treated 8 - 10 miles. LCA has a very vigorous program on the haulers that are allowed to come in. They use liquid oxygen

for the cryogenic unit. It is very expensive.

Mr. Roger MacLean thanked Dr. McGuire and opened the questions to the public.

Mr. Lou Hershman talked about the reports. He asked to add Exhibit C to this report. He asked to put the revenue from the Memorandum of Understanding. He asked if an addendum could be added to it. He asked them to show him what they are doing for compliance. He asked if they put a description of where the revenue is coming from.

Mr. Roger MacLean stated that we can discuss that at another time. This is basically the performance and LCA living up to the agreement.

Mr. Dan Koplisch stated that the session is held in October that focuses on rates and financial. This committee meets twice a year.

Ms. Jennifer McKenna stated that she wishes that they had control over it. Maybe we can come up with something. We will talk about it when we get back.

Mr. Dan Koplisch stated that there is a memo of understanding for example. If we provide services to LCA, for an example, we charge them \$25,000 a year from the city to tie into the Communication Center. If they work on behalf of the city, we pay them.

Mr. Roger MacLean stated that Mr. Hilliard at the last Council meeting filed Right to Knows to cover that. He asked for everything for the city.

Ms. Arundhati Khanwalkar asked if they have it audited.

Mr. Lou Hershman stated that it doesn't break down the Memorandum of Understanding. He stated that he wants more of an explanation. He asked who builds the NIZ for the services that we are providing.

Mr. Rober MacLean asked if anyone can answer that.

Ms. Liesel Gross stated that any new connections whether it is in the NIZ or outside the NIZ is subject to a tapping fee that LCA collects and charges the customer for the services provided.

Mr. Roger MacLean stated, but there is a fee for the businesses in the NIZ.

Ms. Liesel Gross stated yes.

Mr. Glenn Hunsicker asked if the money comes back tot eh Allentown side. He asked about Page 6 and the septic tank holders and the leachate. Are there more than one place they accept this. He asked if they measure the strength and is it the strength out of the last two years. Do they pre-process and give you all of the strength? He asked about the numbers do we get on the revenue for the thousand gallons of water.

Ms. Liesel Gross stated yes.

Mr. Dan Koplish stated that the one who got the Concession Lease could be no more than what they were dealing with the city. The same hauler the city had prior to the Lease and a limit on the hauler and no fracking waste allowed. Leachate was done for 20 years. At the pre-treatment plant, we just treat their discharge. Their discharge is twice of what the permit limit is. What comes out of the pretreatment plant is pre-treated. This is LCA's issue under the Lease. They are basically free. It is a revenue stream.

Mr. Glenn Hunsicker asked how much does the Allentown Division get for the septic haulers. He asked if they had a better deal. He asked who generates the data.

Ms. Liesel Gross stated that we have in our budget line item for leachate haul. Our balance does not include gallons accepted. She stated that it is a different service.

Mr. Roger MacLean stated that we are here for the Compliance to make sure that they are doing what they supposed to be doing.

Ms. Don Koplish stated that we review them and Lisa can tell you that they get rigorously reviewed in terms of what those numbers are.

Ms. Jennifer McKenna stated that they did the Exhibits for him because at the beginning of the process he had said something about how many reports they were doing so they wanted to detail it.

Ms. Liesel Gross stated that the process of generating a report is mutual on both LCA side and the City side. It gives us a way to track our performance. We find value in tracking all this information.

Mr. Tom Hahn, 2016 E. Highland Street, stated that in his neighborhood there was a vacant building and an outfit that was in violations with EPA wanting to move into Allentown to take out large gallon tanks to wash them out. The city was going to move their standards to comply with what the new deal was with the water so that the zoning could not get permits for people with containers. He asked if that was that done? it was on N.

Sherman Street. They were in violation in Quakertown. They would come with large gallon of containers to wash out on N. Sherman Street.

Mr. Roger MacLean stated that based on the presentation that we have seen the city standards are actually more stringent than any other standard.

Mr. Dan Koplisch stated that he doesn't think it got to the point of them submitting any technical data. It never got to a point where it was reviewed.

Mr. Brian Chamberlain stated that typically when an industry comes in it would come for the people to review it and determine. They just can't hook up to the system. If they did, it would be done illegally. There are Ordinances in place to try to protect the city. It requires review and fees.

Mr. Dan Koplisch stated that the city's obligation for the pre-treatment program is to protect the Plan. There are three goals: to protect the quality of the affluent can't demolish, it can't be injurious to any of the treatment processes and can't affect nature of the biological sludges you produce.

Mr. Roger MacLean stated that who ever we are accepting stuff from we know. We don't have a guy named Joe pulling up at midght with a truckload of stuff in the back and trying to dump it in. Any business that is coming in to hook up has to meet certain requirements.

Mr. Dan Koplisch stated that the permitting criteria is the same if you are trying to do this out in the county or here. You have to undergo the same scrutiny.

Mr. Brian Chamberlain stated that our industrial pre-treatment Ordinance goes throughout the system. It's the same set of Rules.

Dr. David McGuire stated that the simple answer to the type of problem that Mr. Hahn is talking about is everybody that is taking something wants to make a fluid product like washing or generating stuff have to get in advance the ability to do its business is to get an NEPDS permit. The city wouldn't allow this. It has it worked into the system.

Mr. Roger MacLean thanked Dr. McGuire and asked if there were any more questions.

Adjourned: 6:16 PM