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Delaware County Regional Water Quality Control Authority  
***CHESTER, PENNSYLVANIA***

CSO Long Term Control Plan

Consent Decree  
Semi-Annual Report No. 1

For the Reporting Period of  
July 1, 2015 - December 31, 2015

CIVIL ACTION NO. Case 2:15-cv-04652-RB  
Filed: 11/10/15

NPDES Permit Number PA0027103 A-1





**SEMI ANNUAL REPORT CERTIFICATION SHEET**  
**Consent Decree Semi-Annual Report No. 1**

**For the Reporting Period of July 1, 2015 - December 31, 2015**  
**CIVIL ACTION NO. Case 2:15-cv-04652-RB**  
**Filed: 11/10/15**

I certify under penalty of law that the document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

DELCORA MANAGEMENT		
Executive Director	 Signature	<u>12-21-15</u> Date
DELCORA ENGINEERING		
Director of Engineering	 Signature	<u>12-16-15</u> Date
DELCORA OPERATIONS AND MAINTENANCE		
Director of Operation and Maintenance	 Signature	<u>12/21/15</u> Date





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## **Section 1 Introduction**

The Delaware County Regional Water Quality Control Authority (DELCORA) entered into a Consent Decree (CD) with the United States Government to establish a schedule for implementation of Long Term Control Plan Update (LTCPU) to achieve full compliance with the Clean Water Act and the regulations and Clean Streams Law and regulations. The lodging of this Consent Decree was entered by the court on August 17, 2015 in Civil Action Case 2:15-cv-04652-RB Document 4 by the United States District Court for the Delaware County Regional Water Quality Control Authority. The Consent Decree was signed and filed on November 10, 2015 by the United States District Court for the Eastern District of Pennsylvania.

## **Section 2 Consent Decree Progress Reports**

On the first Day of each Semi-Annual Period after the Date of Lodging of this Consent Decree and continuing until termination of this Consent Decree, DELCORA will submit to EPA and PADEP a progress report ("Semi-Annual Progress Report") regarding the implementation of the requirements of the Consent Decree in the previous Semi-Annual Period. The Semi-Annual Progress Report will include at a minimum:

- a. A statement setting forth the deadlines and other terms that DELCORA was required by the Consent Decree to meet since the date of the last Semi-Annual Progress Report, whether and to what extent DELCORA has met these requirements, and the reasons for any noncompliance;
- b. A general description of the work completed within the prior Semi-Annual Period, and a projection of work to be performed pursuant to this Consent Decree during the next or succeeding Semi-Annual Period;
- c. A summary of all contacts with EPA and PADEP during the reporting period relating to CSOs, SSOs, or implementation of this Consent Decree;
- d. A statement of any exceedances of NPDES Permit limitations; and,
- e. A summary of all CSOs, SSOs, Unauthorized Releases, and Unpermitted Discharges occurring within the Semi-Annual Period including the actual or estimated frequency, duration, and volume of each CSO, SSO, Unauthorized Release, and Unpermitted Discharge.

## **Section 3 Items Requiring Government Action**

Table 1 is a status report for items requiring government action this reporting period. This may include items such as permits and information requests from government agencies. *Appendix 1 – Additional Correspondence* contains the letters of correspondence to government agencies.

## **Section 4 Deadlines**

Table 2 is a status report of 1) the deadlines and other terms that DELCORA was required by this Consent Decree to meet since the date of the last Semi-annual Progress Report; 2) whether and to what extent DELCORA has met these requirements; and 3) the reasons for any non-compliance.

## **Section 5 Description of Work Completed Within the Six-Month Period and Projection of Work**

Table 3 is a status report of 1) a general description of the work completed within the six-month period; and 2) a projection of work to be performed pursuant to this Consent Decree during the next or succeeding six-month period.

## **Section 6 Summary of All Contacts with EPA AND PADEP**

Table 4 is a summary of all contacts with the EPA and PADEP during the report period relating to CSOs, SSOs or implementation of this Consent Decree. *Appendix 2 – Notification Letters* contains all the letters that were sent to EPA and PADEP which are summarized in Table 4.

## **Section 7 Statement of Exceedances of NPDES Permit Limitations**

Under National Pollutant Discharge Elimination System (NPDES) Permit No. PA0027103, issued and administered by the Pennsylvania Department of Environmental Protection (PADEP), DELCORA is authorized to discharge from the Western Regional Treatment Plant (Outfall 001), four storm water outfalls at the WRTP (028-031) and from 26 combined sewer overflow (CSO) outfalls (002-026, 032, 033) that ultimately discharge to the Delaware River, Chester Creek and/or Ridley Creek.

Table 5 is a summary of any exceedances of NPDES Permit limitations. *Appendix 3 – NPDES Permit Exceedance Report* contains the NPDES Permit exceedance reports generated within this six-month reporting period.

## **Section 8 Summary of All CSOs, SSOs and Unpermitted Discharges Occuring within the Six-Month Period**

Table 6 is a summary of all CSOs, SSOs and Unpermitted Discharges occurring within the six-month reporting period including the actual or estimated frequency, duration and volume of each CSO, SSO and unpermitted discharge. *Appendix 4 – CSOs, SSOs and Unpermitted Discharges Correspondence* contains all CSO correspondence and inspections for the reporting period.



# Table 1

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## Items Requiring Government Action







## Table 2

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Deadlines for this Reporting Period of  
Consent Decree



[illegible]





## Table 3

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Work Completed Within the Six-Month  
Period and to be Completed in the Next  
Six-Month Period



TABLE 3 WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD				
Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
Draft Consent Decree	July 2015	Provided Comments to USEPA on draft Consent Decree	None	Completed
Final Consent Decree	August 17, 2015	Final Consent Decree	Lodged 8/17/15 Filed 11/10/15	Completed
FCA	June – July 2015	Started initial Financial Capabilities Assessment (FCA) data gathering	Draft FCA 5/17/16	On-going, On schedule
LTCPU	July 2015	Gave notice to proceed on July 21, 2015 to Greeley and Hansen and Subconsultants to start the development of the Long Term Control Plan Update (LTCPU) Held Kick-Off meeting with Greeley and Hansen and subconsultants on July 22, 2015.	2/17/19	On-going, On schedule
LTCPU	July 2015 thru Dec. 2015	Held Monthly Progress Meetings with Greeley and Hansen and subconsultants. Prepared Monthly Progress Reports. Held internal coordination meetings and teleconferences. Developed LTCPU schedule. Updated Overall LTCPU Schedule with Consent Decree Start Date. Reviewed previous USEPA comments on LTCP.	2/17/19	On-going, On schedule
<b>Consent Decree V.A. 11:</b> Identification of Sensitive Areas and Pollutants of Concern	July 2015 thru Dec. 2015	<u>Identification of Sensitive Areas and Pollutants of Concern</u> Reviewed water quality parameters. Evaluated potential Pollutants of Concern. Began compiling water quality data for the Delaware River, Chester Creek and Ridley Creek from EPA's STORET data base. Sent letters requesting information on sensitive areas to governmental agencies and collected additional information. Conducted community outreach by sending to rate payers a public input survey to solicit information on how the public is using receiving streams including interaction with waterbodies.	6 months - 2/17/16	On-going, On schedule

TABLE 3 WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD				
Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
<b>Consent Decree V.A.12:</b> Typical Year Rainfall Record Report	July 2015 thru Nov. 2015	<u>Typical Year Rainfall Record</u> Gathered information and conducted review of background materials, previous reports and previous USEPA comments related to Typical Year Rainfall Record. Performed statistical evaluation of 100-year rainfall record. Determined criteria used in selecting the typical period and performed preliminary ranking analysis. Reviewed draft and final report. Submitted Final Report to USEPA.	90 days - 11/17/15	MET REQUIREMENT 11/09/15 Submitted final report to USEPA,
<b>Consent Decree V.A.13:</b> Alternatives Evaluation Approach	July 2015 thru Dec. 2015	<u>Alternatives Evaluation Approach</u> Gathered information and conducted review of background materials, previous reports and previous USEPA comments related to Alternatives Evaluation Approach.	9 months - 5/17/16	On-going, On schedule
<b>Consent Decree V.A.14:</b> Hydrologic and Hydraulic Model (H&H Model) Update and Calibration Plan	July 2015 thru Oct. 2015	<u>Hydrologic &amp; Hydraulic Model ("H&amp;H Model") Update &amp; Calibration Plan</u> Collected existing background information. Reviewed background materials, previous reports and previous USEPA comments for information that related to the Identification of Sensitive Areas and Pollutants of Concern. Reviewed GIS Model and developed Data Gap Memorandum. Reviewed H&H Model and developed Data Gap Memorandum and schedule. Reviewed draft and final report. Submitted Final Report.	60 Days 10/17/15	MET REQUIREMENT 10/21/15 Submitted final report to USEPA
<b>Consent Decree V.A.14e:</b> Rainfall and Flow Monitoring	July 2015 thru Dec. 2015	<u>Initiate Rainfall and Flow Monitoring</u> Reviewed background materials, previous reports, and previous USEPA comments related to the Rainfall Data. Began to implement flow monitoring plan as included in H&H Model Update and Calibration Plan. Reviewed rainfall and flow monitoring plan and schedule.	12 months monitoring	On-going, On schedule
<b>Consent Decree V.A.16:</b> Existing Service Area Characterization		<u>Existing Service Area Characterization</u> Began to review the H&H Model Developing plan to install flow meter and rain gauges as it relates to the existing service area characterization .	24 months 8/17/17	On-going, On schedule

<b>TABLE 3</b> <b>WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD</b>				
Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
<b>Consent Decree</b> <b>V.A.17:</b> Public Participation Plan	July 2015 thru Oct 2015	<u>Public Participation Plan</u> Reviewed background materials, previous reports, meeting minutes and previous USEPA comments that related to the Public Participation Plan. Developed plan in accordance with Consent Decree requirements. Reviewed draft and final report. Submitted Final Report.	11/17/15	MET REQUIREMENT 10/21/15 Submitted final report to USEPA
<b>Consent Decree</b> <b>V.A.18:</b> Financial Capabilities Assessment	July 2015 thru Dec 2015	<u>Draft Financial Capabilities Assessment (FCA)</u> Working to developed draft FCA in accordance with CSO Control Policy. Continue to gather data related to sewer rate setting and median household income and number of households. Reviewed previous USEPA comments.	9 months 5/17/16	On-going, On schedule
<b>Consent Decree</b> <b>V.II Reporting:</b>	July 2015 thru Dec 2015	<u>Semi-Annual Report</u> – Developed Draft Report. Progress meeting held on 12/16/15. Reviewed Final Draft Report.	12/31/15	On schedule- All data in this semiannual report is through Dec. 28, 2015. Next report will include information from Dec 29, 2015.
<b>Consent Decree</b> <b>V.B.26:</b> Early Action CSO Control Measures	Currently in Design Phase	<u>Additional Early Action Items.</u> - In addition to Early Action Items identified in the Consent Decree DELCORA is taking the following steps to further reduce CSOs: <b>Separation of sewers to eliminate the CSO at Outfall 32.</b>	Not a Consent Decree Requirement	On-going, On schedule
<b>Consent Decree</b> <b>V.B.26:</b> Early Action CSO Control Measures	Design of temporary system and permanent system complete. Proceeding with Construction	<u>Additional Early Action Items.</u> - In addition to the Early Action Items identified in the Consent Decree DELCORA is taking the following steps to further reduce CSOs: <b>Wet weather relief sewer system for the Delaware interceptor. A temporary system is in use. Currently planning to proceed with construction of a permanent system.</b>	Not a Consent Decree Requirement	On-going, On schedule

TABLE 3 WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD				
Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
<b>Anticipated activities for the next 6 months</b>				
<b>Consent Decree V.A. 11:</b> Identification of Sensitive Areas and Pollutants of Concern	January 2016 thru Feb. 2016	<u>Identification of Sensitive Areas and Pollutants of Concern</u> Finalize identification of sensitive areas and pollutants of concern and submit final report. Will submit final report to USEPA.	6 months - 2/17/15	On-going, On schedule
<b>Consent Decree V.A. 14e:</b> Rainfall and Flow Monitoring	Jan. 2016 through Jan. 2017	<u>Initiate Rainfall and Flow Monitoring</u> Initiate rainfall and flow monitoring plan. .	12 months 12 months of flow monitoring	On-going, Flow monitoring may commence in February/March 2016 based on purchase of flow monitoring equipment.
<b>Consent Decree V.A. 13:</b> Alternatives Evaluation Approach	January 2016 thru May 2016	<u>Alternatives Evaluation Approach</u> Finalize alternatives evaluation approach and report. Will submit final report to USEPA.	9 months 5/17/16	On-going, On schedule
LTCPU <b>CD V.A. 18:</b> Financial Capabilities Assessment	January 2016 thru May 2016	<u>Draft Financial Capabilities Assessment (FCA)</u> Finalize FCA calculations and report. Will submit final report to USEPA.	9 months 5/17/16	On-going, On schedule

## Table 4

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Summary of All Contacts with the EPA and  
the PADEP





[illegible]

1. Copies of Correspondence are in Appendix 2



## Table 5

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### Summary of any Exceedances of NPDES Permit Limitations



TABLE 5 SUMMARY OF ANY EXCEEDANCES OF NPDES PERMIT LIMITATIONS DELCORA PERMIT NO. PA0027103 A3	
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NOTES:

1. Copy of Report is in Appendix 3
2. WRTP – DELCORA Western Regional Treatment Plant



## Table 6

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Summary of All CSOs, SSOs and  
Unpermitted Discharges Occurring within  
the Six-Month Period





**TABLE 6**  
**SUMMARY OF ALL CSOs, SSOs and UNPERMITTED DISCHARGES OCCURRING WITHIN THE SIX-MONTH PERIOD**  
**DELCORA Permit no. PA0027103**

Date of Occurrence	Location	Event	Frequency	Duration	Volume	Comment
07/07/15	3201 W. Front Street (WRTP)	SSO	Once	The incident happened at approximately 12:30 PM and lasted approximately 45 minutes	Volume unknown but estimated to be >1,000 gallons.	Report sent 07/07/15, within 5 days; Called PADEP on 07/07/15 day of occurrence
7/16/15	CSO #004 Front and Hayes	CSO	Once	Last checked at 11:05am 7/15/15. Heavy downpours during the day 7/15/15. No actual start time, CSO overflow stopped at 6:24am on 7/16/15.	Unknown	Report sent 7/16/15 same day as occurrence and within 5 days.
8/26/15	Manhole #1779 in front of 2753 Bethel Road	DWO	Once	Start Time: Approximately 2:15 PM End Time: Approximately 2:40 PM	Amount overflow is unknown.	Report sent 08/27/15, within 5 days; Called PADEP on 08/26/15 day of occurrence
9/10/15	Central Delaware PS, Sellers Avenue	SSO	Once	Start: Approximately 10:55 PM Stopped: Approximately 11:55 PM	Unknown	Report sent 9/14/15 within 5 days. Called PADEP on 9/11/15
9/11/15	Taylor Arboretum - Ridley Interceptor MH # 2875	SSO	Once	Started sometime during heavy rainfall late 9/10. End unknown.	Unknown	Report sent 9/14/15, within 5 days; Called PADEP on 09/11/15 day of occurrence
09/11/15	3201 W. Front Street (WRTP)	SSO	Once	The incident happened at approximately 12:15 AM and ended at approximately 1:45 AM	Volume unknown.	Report sent 09/14/15, within 5 days; Called PADEP on 09/11/15 day of occurrence
9/12/15	CSO #004 - Front and Hayes	DWO	Once	Start time unknown - ended 9/12/15 at 8:40am.	Unknown	Report sent 9/14/15, within 5 days. Called PADEP on 9/12/15 day of occurrence
9/12/15	CSO #005 - Townsend St.	DWO	Once	Started during rainfall event on 9/10 which ended by 12:00 AM on 9/11.	Unknown, Flow to be calculated by model	Report sent 9/14/15, within 5 days; Called PADEP on 9/12/15 day of occurrence
9/12/15	CSO #007 - Rainey St.	DWO	Once	Started during rainfall event on 9/10 which ended by 12:00 AM on 9/11.		Report sent 9/14/15, within 5 days; Called PADEP on 9/12/15 day of occurrence
11/06/15	3201 W Front Street, (WRTP)	DWO	Once	The incident happened at approximately 12.36 PM and ended at approximately 12:42 PM	Unknown	Report sent 11/09/15, within 5 days; Called PADEP on 11/06/15 day of occurrence

<b>TABLE 6</b> <b>SUMMARY OF ALL CSOs, SSOs and UNPERMITTED DISCHARGES OCCURRING WITHIN THE SIX-MONTH PERIOD</b> <b>DELCORA Permit no. PA0027103</b>						
<b>Date of Occurrence</b>	<b>Location</b>	<b>Event</b>	<b>Frequency</b>	<b>Duration</b>	<b>Volume</b>	<b>Comment</b>
12/23/15	3201 W Front Street, (WRTP)	SSO	Once	The incident started at approximately 4:00 PM and ended at approximately 5:30 PM.	Unknown	Report sent 12/28/15, within 5 days; Called PADEP on 12/23/15 day of occurrence

**NOTES:**

1. DWO – Dry Weather Overflow; SSO – Sanitary Sewer Overflow; CSO – Combined Sewer Overflow
2. Copy of Reports are in Appendix 4

# Appendix 1

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## Additional Correspondence



DELCORA CSO LTCP  
Sensitive Areas Contact Sheet

No.	Sensitive Area Item	Contact / Position	Title	Agency	Street	City	State	Zip	Phone Number	Email	Date Sent	Response Date
1	Endangered Species	Robert Anderson	Fish & Wildlife Biologist	US Fish and Wildlife Agency	110 Radnor Road, Suite 101	State College	PA	16801-7987	814-237-4090 x7447			11/2/2015
2	Threatened and Endangered Birds	Brendalee Phillips	Wildlife Biologist	US Fish and Wildlife - John Heinz NWR Birds	8601 Lindbergh Blvd.	Philadelphia	PA	19153	215-365-3118 x119		10/29/2015	
3		Jennifer Fields	Program Manager	PA DEP	2 East Main Street	Norristown	PA	19401	484-250-5192	<a href="mailto:jefields@pa.gov">jefields@pa.gov</a>	10/29/2015	11/17/15 - phone call
4		Steve Tambini	Executive Director	Delaware River Basin Commission (DRBC)	25 State Police Drive	West Trenton	NJ	08628-0360	609-883-9500 x203		10/29/2015	
5	Threatened and Endangered Birds	Patti Barber	Endangered Bird Biologist	PA Game Commission	2001 Elmerton Ave	Harrisburg	PA	17110-9797	717-303-4482		10/29/2015	
6	Threatened and Endangered Birds	Ian Gregg	Wildlife Biologist	PA Game Commission	2001 Elmerton Ave	Harrisburg	PA	17110-9797	814-422-8239		10/29/2015	
7		Carol F. McCabe, Esq.	Chair	PA Environmental Council	1315 Walnut Street, Suite 532	Philadelphia	PA	19107	215-545-4570		10/29/2015	
8	Primary Contact Areas	Brian Byrnes	Executive Director	Chester Ridley Crum Watersheds Association	P.O. Box 227	Gradyville	PA	19039	610-359-1440		10/29/2015	11/23/15 - call
9		David Chanda	Director Fish and Wildlife	New Jersey Department of Environmental Protection (NJDEP)	P.O. Box 420 501 E State Street, 3rd Floor	Trenton	NJ	08625	609-292-9410		10/29/2015	
10	Atlantic and Shortnose Sturgeon, river herring, shad	Matt Fisher	Director Fish and Wildlife	Delaware Department of Natural Resources and Environmental Control (DNREC)	89 Kings Highway	Dover	DE	19901	302-735-8663		10/29/2015	11/30/2015
11	Delaware River and tributaries	John Buzzar	Fisheries Biologist	PA Fish and Boat Commission (PFBC)	1601 Elmerton Ave	Harrisburg	PA	17110	717-705-7800 610-847-5983		10/29/2015	
12	Freshwater Mussels	Dr. Danielle Kreeger	Science Director	Partnership for the Delaware Estuary (PDE)	110 S Poplar Street, Suite 202	Wilmington	DE	19801	302-655-4990 x104		10/29/2015	11/25/2015



October 29, 2015

Carol F. McCabe, Esquire  
PA Environmental Council  
1315 Walnut Street  
Suite 532  
Philadelphia, PA 19107

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Ms. McCabe:

Greeley and Hansen is developing a Long Term Control Plan (LTCP) for the Delaware County Regional Water Quality Control Authority (DELCORA) located in Chester, PA. A map of the study area is provided as an attachment to this letter. The goal of this LTCP is to reduce the frequency, duration and intensity of combined sewer overflow events into the local waterbodies, including portions of the Delaware River, Chester Creek and Ridley Creek. As part of this evaluation, environmentally sensitive areas within the study area need to be identified so that appropriate considerations can be made to reduce combined sewer overflows to these areas.

Sensitive Areas are defined by the United States Environmental Protection Agency (USEPA) Federal Register Combined Sewer Overflow (CSO) Control Policy and the US EPA Guidance for Long Term Control Plan as follows:

- Outstanding National Resource Waters (ONRW)
- National Marine Sanctuaries
- Waters with threatened or endangered species and their habitat
- Waters with primary contact recreation (i.e. beaches, boat ramps, boat launches, etc.)
- Public drinking water intakes or their designated protection areas
- Shellfish beds

USEPA requirements indicate that sensitive areas are given the highest priority during the development of technical alternatives.

This letter is being submitted to your agency as a formal request for information that your agency may have on sensitive areas within Delaware County, PA. Specifically, we are interested in sensitive areas located within the area of study as shown in GREEN on the attached map. If portions of the study area meet the above sensitive area criteria, we request that you provide the following information:

- Complete list of identified Sensitive Areas;
- Narrative description of how the sensitive area criteria listed above applies to the study area;
- Map of specific locations within our study area identifying the specific sensitive areas; and
- Any additional information you deem appropriate.

DELCORA is under a Consent Decree to submit this study to USEPA in February 2016. In order to meet project milestones, we respectfully request you provide a response within 30 days of receipt of this letter, no later than November 23, 2015. We appreciate your cooperation and assistance in completing this study. Should you need any additional information, please feel free to contact me at (215) 553-7919 or Julia Spicher at (215) 553-7926.

Yours very truly,

Greeley and Hansen LLC



Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen







October 29, 2015

Ms. Patti Barber  
PA Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Ms. Barber:

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Yours very truly,

Greeley and Hansen LLC



Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen



**GREELEY AND HANSEN**

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p 215 563 3460  
f 215 563 1139  
[www.greeley-hansen.com](http://www.greeley-hansen.com)

October 29, 2015

Ms. Jennifer Fields  
Pennsylvania Department of Environmental  
Protection  
2 East Main Street  
Norristown, PA 19401

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Ms. Fields:

Greeley and Hansen is developing a Long Term Control Plan (LTCP) for the Delaware County Regional Water Quality Control Authority (DELCORA) located in Chester, PA. A map of the study area is provided as an attachment to this letter. The goal of this LTCP is to reduce the frequency, duration and intensity of combined sewer overflow events into the local waterbodies, including portions of the Delaware River, Chester Creek and Ridley Creek. As part of this evaluation, environmentally sensitive areas within the study area need to be identified so that appropriate considerations can be made to reduce combined sewer overflows to these areas.

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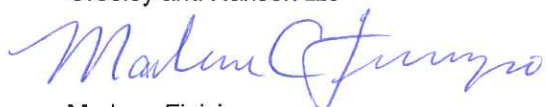
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Yours very truly,

Greeley and Hansen LLC



Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen





October 29, 2015

Mr. Ian Gregg  
PA Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Mr. Gregg:

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Greeley and Hansen LLC



Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen





October 29, 2015

Mr. Steven Tambini  
Executive Director  
Delaware River Basin Commission  
25 State Police Drive  
West Trenton, NJ 08628-0360

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Mr. Tambini:

Greeley and Hansen is developing a Long Term Control Plan (LTCP) for the Delaware County Regional Water Quality Control Authority (DELCORA) located in Chester, PA. A map of the study area is provided as an attachment to this letter. The goal of this LTCP is to reduce the frequency, duration and intensity of combined sewer overflow events into the local waterbodies, including portions of the Delaware River, Chester Creek and Ridley Creek. As part of this evaluation, environmentally sensitive areas within the study area need to be identified so that appropriate considerations can be made to reduce combined sewer overflows to these areas.

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Greeley and Hansen LLC



Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen



October 29, 2015

Ms. Brendalee Phillips  
US Fish and Wildlife - John Heinz  
NWR Birds  
8601 Lindbergh Boulevard  
Philadelphia, PA 19153

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Ms. Phillips:

Greeley and Hansen is developing a Long Term Control Plan (LTCP) for the Delaware County Regional Water Quality Control Authority (DELCORA) located in Chester, PA. A map of the study area is provided as an attachment to this letter. The goal of this LTCP is to reduce the frequency, duration and intensity of combined sewer overflow events into the local waterbodies, including portions of the Delaware River, Chester Creek and Ridley Creek. As part of this evaluation, environmentally sensitive areas within the study area need to be identified so that appropriate considerations can be made to reduce combined sewer overflows to these areas.

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Yours very truly,

Greeley and Hansen LLC



Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen



October 29, 2015

Mr. Brian Byrnes  
Executive Director  
Chester Ridley Crum Watersheds Association  
38 Bishop Hollow Road  
Newtown Square, PA 19073

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Mr. Byrnes:

Greeley and Hansen is developing a Long Term Control Plan (LTCP) for the Delaware County Regional Water Quality Control Authority (DELCORA) located in Chester, PA. A map of the study area is provided as an attachment to this letter. The goal of this LTCP is to reduce the frequency, duration and intensity of combined sewer overflow events into the local waterbodies, including portions of the Delaware River, Chester Creek and Ridley Creek. As part of this evaluation, environmentally sensitive areas within the study area need to be identified so that appropriate considerations can be made to reduce combined sewer overflows to these areas.

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Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen





1700 Market Street, Suite 2130  
Philadelphia, Pennsylvania 19103  
p 215 563 3460  
f 215 563 1139  
[www.greeley-hansen.com](http://www.greeley-hansen.com)

October 29, 2015

Ms. Danielle Kreeger  
Partnership for the Delaware Estuary  
110 S. Poplar Street  
Suite 202  
Wilmington, DE 19801

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Ms. Kreeger:

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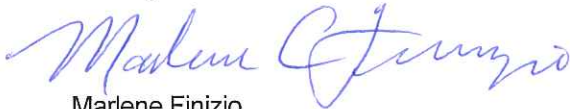
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Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen





October 29, 2015

Mr. John Buzzar  
PA Fish and Boat Commission  
1601 Elmerton Avenue  
Harrisburg, PA 17110

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Mr. Buzzar:

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Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen



October 29, 2015

Mr. Matthew Fisher  
Delaware Department of Natural Resources  
and Environmental Control  
89 Kings Highway  
Dover, DE 19901

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Mr. Fisher:

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*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen



**GREELEY AND HANSEN**

1700 Market Street, Suite 2130  
Philadelphia, Pennsylvania 19103  
p 215 563 3460  
f 215 563 1139  
[www.greeley-hansen.com](http://www.greeley-hansen.com)

October 29, 2015

Mr. David Chanda  
Director Fish and Wildlife  
New Jersey Department of  
Environmental Protection  
P.O. Box 420  
501 E. State Street, 3<sup>rd</sup> Floor  
Trenton, NJ 08625

Subject: Delaware County Regional Water Quality Authority  
CSO Long Term Control Plan Update  
Sensitive Areas Study

Dear Mr. Chanda:

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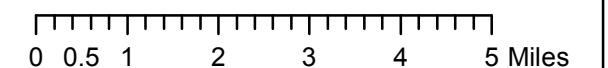
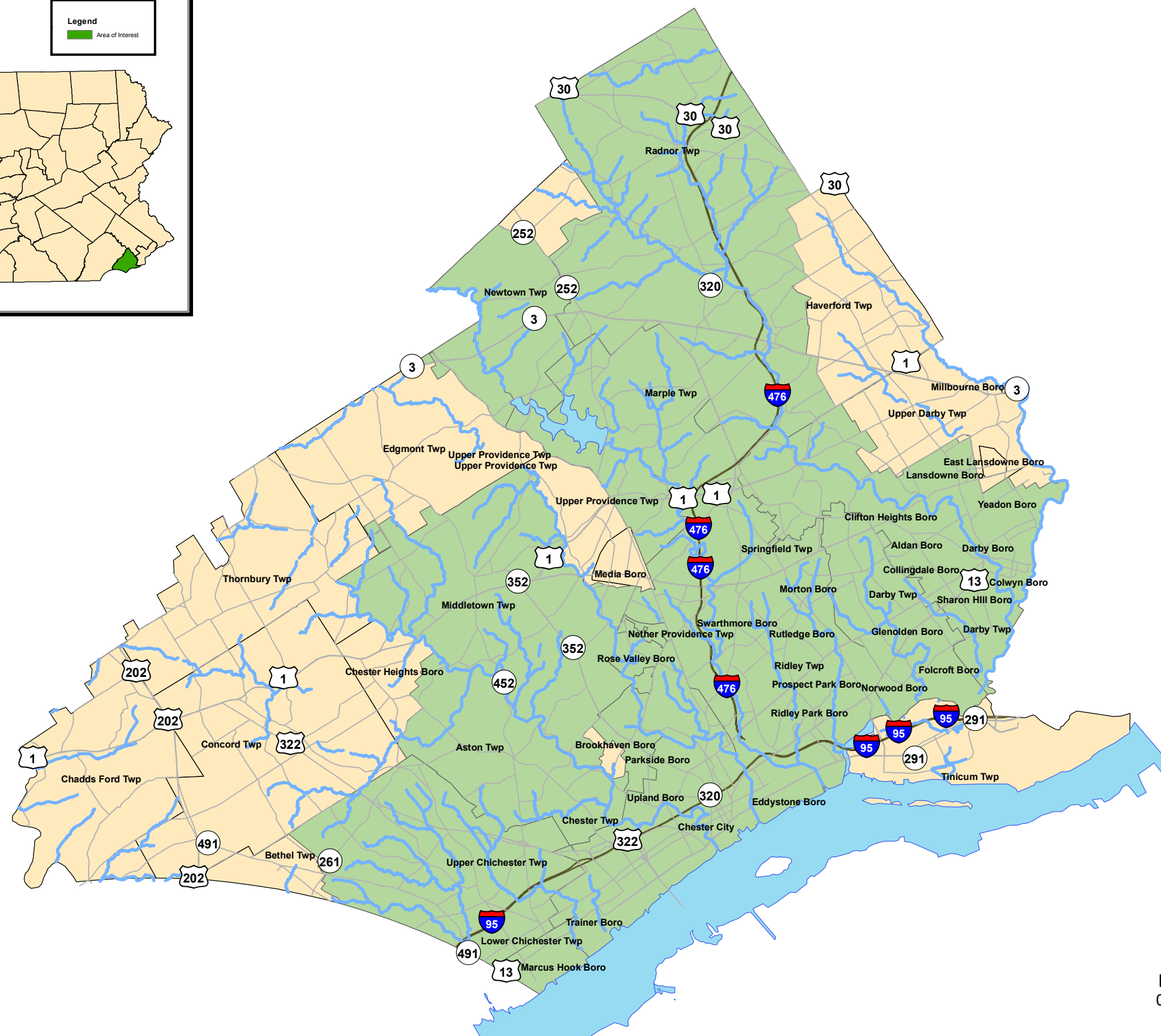
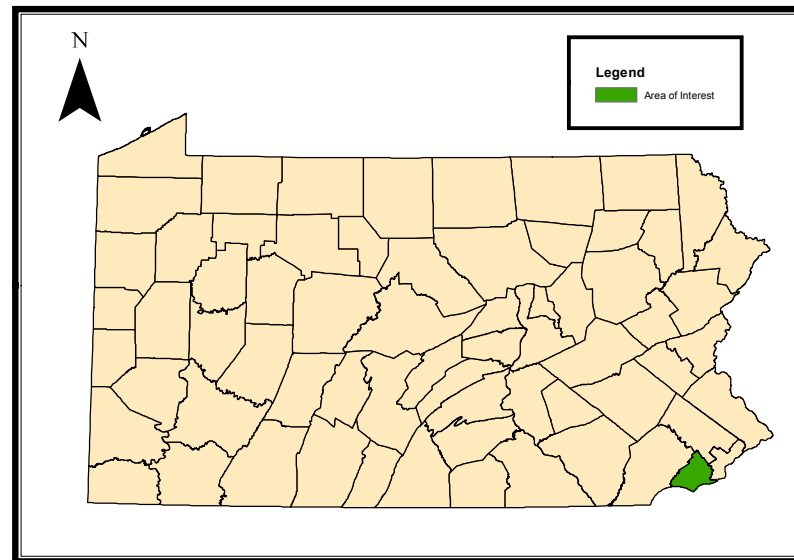
Yours very truly,

Greeley and Hansen LLC



Marlene Finizio  
*Project Manager*

c: Robert Willert, DELCORA  
Michael DeSantis, DELCORA  
Edwin Bothwell, DELCORA  
Michael Hope, Greeley and Hansen  
Julia Spicher, Greeley and Hansen



# IDENTIFICATION OF SENSITIVE AREAS STUDY AREA MAP OCTOBER 2015



**GREELEY AND HANSEN**

# Appendix 2

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## Notification Letters







DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY  
P.O. Box 999 • Chester, PA 19016-0999

November 20, 2015

FEDERAL EXPRESS – NEXT DAY

Program Manager  
Clean Water Program  
PA Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401

RE: Civil Penalty Associated with DOJ Case Number 90-5-1-1-10972

Dear Program Manager:

In compliance with the afore-mentioned case, DELCORA is submitting a check in the amount of \$688,352.12.

Enclosed please find the wiring instructions DELCORA received on November 19, 2015 from the US Department of Justice. Please note the amount of \$688,352.12. DELCORA is remitting the same amount to PADEP.

Please contact me at [willertr@delcora.org](mailto:willertr@delcora.org) or 610-876-5523, extension 110, should you have any questions.

Sincerely,

Robert J. Willert  
Executive Director

RJW:bab  
enclosures

cc: Margaret Hill, Blank Rome  
Marlene Finizio, Greeley and Hansen  
Michael Hope, Greeley and Hansen  
Michael DiSantis, DELCORA  
John Pileggi, DELCORA  
File – Consent Order – LTCP CSO

ADMINISTRATION

☐ 610-876-5523  
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526  
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523  
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523  
☐ FAX: 610-497-7950

November 20, 2015

**TRANSMITTAL OF PENALTY PAYMENT**

PAYABLE TO: COMMONWEALTH OF PENNSYLVANIA - CLEAN WATER FUND

**MAILING ADDRESS:**

PA Department of Environmental Protection  
Bureau of Water Management  
Southeast Regional Office  
2 East Main St.  
Norristown, PA 19401-4915

**FROM:** DELCORA  
P. O. BOX 999  
CHESTER, PA 19016-0999

**RE:** Settlement Agreement with --

Ref: Multiple CSO Violations – 2009 through 2014  
Consent Decree (USEPA/PADEP)

<b>Company</b>	<u>DELCORA</u>
<b>Plant</b>	<u>WESTERN REGIONAL TREATMENT PLANT</u>
<b>Township</b>	<u>CITY OF CHESTER</u>
<b>County</b>	<u>DELAWARE</u>
<b>Date</b>	<u>(leave blank)</u> (Agreement Entered Into)

As required by the above agreement, a payment in the amount of \$ 688,352.12  
is enclosed.



(Signature)

Robert J. Willert  
Executive Director

(Title)

Enclosure  
Re 30 (WP)





DELAWARE COUNTY REGIONAL  
WATER QUALITY CONTROL AUTHORITY  
CHESTER, PA

59918

DATE	INVOICE NO.	DESCRIPTION	NET AMOUNT
11/17/2015	PRWK 46-15	INTEREST	688,352.12

Total: \$688,352.12

SAFEGUARD LITHO USA 02/12 W12SF000136M

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

DELAWARE COUNTY REGIONAL  
WATER QUALITY CONTROL AUTHORITY  
100 East Fifth Street • P.O. Box 999  
Chester, PA 19016-0999



3-180/360

59918

DATE:

11/20/2015

AMOUNT:

\$688,352.12

CHECK:

PAY

Six Hundred Eighty-Eight Thousand Three Hundred Fifty-Two and 12/100 Dollars

TO  
THE  
ORDER  
OF

Commonwealth of Pennsylvania Clean Water Fund  
2 E. Main Street SE Regional Office  
Program Mgr. Clean Water Program  
Dept. of Environmental Protection  
NORRISTOWN, PA 19401

*Shirley R. Kester*  
*John D. Pileggi*

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE - RED IMAGE DISAPPEARS WITH HEAT.

⑈059918⑈ ⑆036001808⑆ 36 087612 2⑈

**FEDWIRE Electronic Funds Transfer**  
**to the**  
**United States Department of Justice**

Notice Date: 11/18/2015

Expected Date: 12/10/2015

Delaware County Regional Water Quality Control Authority (DELCORA)

To transfer funds electronically to the Federal Reserve/United States Treasury Department in New York City located at 33 Liberty Street, New York, NY 10045, for Credit to the United States Department of Justice, the following information must be provided to the bank from which the funds are to be transferred. This information will enable the sending bank to complete those fields associated with the beneficiary bank of a "*FedWire Structured Third Party Format*" electronic funds transfer.

ITEM	DESCRIPTION	CODING INFORMATION FOR FEDWIRE FORMAT
2	Receiving Bank ABA Code	021030004
3	Message Type Code	1000
7	Wire Amount	\$688,352.12
9	Receiver ABA name/Business Func code	TREAS NYC/CTR
10	Beneficiary Name	U.S. DEPARTMENT OF JUSTICE
11	Account No.	15030001
12	Required Beneficiary Information: *Collection Office Identifier *Debtor Name *DJ Number *CDCS Number *EFT No.	USAO/PAE Delaware County Regional Water Quality Control Authority (DELCORA) 90-5-1-1-10972 2016A10146 PAE16E003

**ATTENTION FINANCIAL LITIGATION PERSONNEL:**

The debtor/debtor's attorney must provide this form to the bank from which the funds are to be transferred to ensure that the electronic transfer of funds is accomplished and properly credited to the United States Department of Justice/Debt Accounting Operations Group.

**AUTHORITY:**

The above information requirements are in accordance with the United States Treasury Department "Treasury Requirements Manual/Part 6 - Chapter 8000"; Appendix E of the "Federal Reserve Bank Funds Transfer Systems Manual"; and 31 CFR Part 206 (Federal Register - Vol. 59 , No. 20).

**Questions regarding this FedWire EFT should be directed to the responsible Collection Office:**

**POINT OF CONTACT:** Linda Statham

**TELEPHONE NUMBER:** (215)-861-8270

Limited Official Use

72

30

2200

2200

2200

2200

2200

**FedEx** Package  
Express *US Airbill*
FedEx  
Tracking  
Number

8082 5253 2461

## 1 From Please print and press hard.

Date 11/20/2015 Sender's FedEx Account Number 1060-5969-1

Sender's Name Robert J. Willert/bab Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2

Dept./Room/Suite/Room

City CHESTER State PA ZIP 19013-4508

## 2 Your Internal Billing Reference

First 24 characters will appear on invoice.

Consent Order Penalty

## 3 To

Recipient's Name Program Manager Phone (484) 250-5970

Company PADEP - Clean Water Program

Address 2 East Main Street

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Room/Suite/Room

HOLD Weekday  
FedEx location address  
REQUIRED. NOT available for  
FedEx First Overnight.HOLD Saturday  
FedEx location address  
REQUIRED. Available ONLY for  
FedEx Priority Overnight and  
FedEx 2Day to select locations.

Address Use this line for the HOLD location address or for continuation of your shipping address.

City Norristown State PA ZIP 19401

0119850666


 Get transit times. Schedule pickups.  
Create labels. Go to [fedex.com](http://fedex.com).

MUR 1

Form  
10 No.

0215

Sender's Copy

## 4 Express Package Service

\* To most locations.

NOTE: Service order has changed. Please select carefully.

 Packages up to 150 lbs.  
For packages over 150 lbs., use the new  
FedEx Express Freight US Airbill.

## Next Business Day

☐ FedEx First Overnight  
Earliest next business morning delivery to select  
locations. Friday shipments will be delivered on  
Monday unless SATURDAY Delivery is selected.

☒ FedEx Priority Overnight  
Next business morning.\* Friday shipments will be  
delivered on Monday unless SATURDAY Delivery  
is selected.

☐ FedEx Standard Overnight  
Next business afternoon.\*  
Saturday Delivery NOT available.

## 2 or 3 Business Days

☐ FedEx 2Day A.M.  
Second business morning.\*  
Saturday Delivery NOT available.

☐ FedEx 2Day  
Second business afternoon.\* Thursday shipments  
will be delivered on Monday unless SATURDAY  
Delivery is selected.

☐ FedEx Express Saver  
Third business day.\*  
Saturday Delivery NOT available.

## 5 Packaging

\* Declared value limit \$500.

☒ FedEx Envelope\* ☐ FedEx Pak\* ☐ FedEx Box ☐ FedEx Tube ☐ Other

## 6 Special Handling and Delivery Signature Options

☐ SATURDAY Delivery  
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required  
Package may be left without  
obtaining a signature for delivery.

☐ Direct Signature  
Someone at recipient's address  
may sign for delivery. *Fee applies.*
☐ Indirect Signature  
If no one is available at recipient's  
address, someone at a neighboring  
address may sign for delivery. *Fee applies.*

## Does this shipment contain dangerous goods?

One box must be checked.

☒ No ☐ Yes  
As per attached  
Shipper's Declaration. ☐ Yes  
Shipper's Declaration  
not required.

 Dangerous goods (including dry ice) cannot be shipped in FedEx packaging  
or placed in a FedEx Express Drop Box.

☐ Dry Ice  
Dry Ice, 3, UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg  
☐ Cargo Aircraft Only

## 7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☒ Sender  
Acct. No. in Section  
I will be billed.

☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

 FedEx Acct. No.  
Credit Card No.
Exp.  
Date

Total Packages Total Weight Total Declared Value\*

1 lbs \$ 00

 \*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you  
agree to the service conditions in the back of this Airbill and in the current FedEx Service Guide, including terms  
that limit our liability.

611

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Phone: (215) 569-5331  
Fax: (215) 832-5331  
Email: [M.Hill@BlankRome.com](mailto:M.Hill@BlankRome.com)

October 21, 2015

**VIA USPS FIRST PRIORITY MAIL**

Chief, Environmental Enforcement  
Section  
Environmental and Natural Resources  
Division  
U.S. Department of Justice  
P.O. Box 7611, Ben Franklin Station  
Washington, DC 20044-7611

**VIA FEDERAL EXPRESS**

Program Manager – Clean Water Program  
Department of Environmental Protection  
Southeast Regional Office  
2 E. Main Street  
Norristown, PA 19401

**VIA HAND DELIVERY**

Chief  
NPDES Enforcement Branch (3WP42)  
Water Protection Division  
U.S. Environmental Protection Agency,  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

**VIA HAND DELIVERY**

Philip Yeany  
Office of Regional Counsel (3RC20)  
U.S. Environmental Protection Agency,  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Re: United States and PA Dept. of Environmental Protection v DELCORA**

Dear Sirs/Madams:

Enclosed you will find Delaware County Regional Water Quality Control Authority's ("DELCORA") Hydrologic and Hydraulic Model Update and Calibration Plan which is submitted pursuant to Paragraph 14 of the Lodged Consent Decree, and DELCORA's Public Participation Plan which is submitted pursuant to Paragraph 17 of the Lodged Consent Decree.

Regards,

*Margaret Anne Hill* law

MARGARET ANNE HILL

MAH/law  
Enclosures

cc: Robert J. Willert, DELCORA (w/o enclosures)

*Phone:* (215) 569-5331  
*Fax:* (215) 832-5331  
*Email:* [MHill@BlankRome.com](mailto:MHill@BlankRome.com)

November 9, 2015

**VIA USPS FIRST PRIORITY MAIL**

Chief, Environmental Enforcement  
Section  
Environmental and Natural Resources  
Division  
U.S. Department of Justice  
P.O. Box 7611, Ben Franklin Station  
Washington, DC 20044-7611

**VIA FEDERAL EXPRESS**

Program Manager – Clean Water Program  
Department of Environmental Protection  
Southeast Regional Office  
2 E. Main Street  
Norristown, PA 19401

**VIA HAND DELIVERY**

Chief  
NPDES Enforcement Branch (3WP42)  
Water Protection Division  
U.S. Environmental Protection Agency,  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

**VIA HAND DELIVERY**

Philip Yeany  
Office of Regional Counsel (3RC20)  
U.S. Environmental Protection Agency,  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Re: United States and PA Dept. of Environmental Protection v DELCORA**

Enclosed you will find Delaware County Regional Water Quality Control Authority's ("DELCORA") "Typical Hydrologic Period Report" which is submitted pursuant to Paragraph 12 the Lodged Consent Decree. This Report is due to the Agency on November 17, 2015.

Regards,

*Margaret Hill*

MARGARET ANNE HILL

MAH/law  
Enclosures

cc: Robert J. Willert, DELCORA ( w/o enclosures)

## Finizio, Marlene

---

**From:** Hill, Margaret A. <mhill@blankrome.com>  
**Sent:** Wednesday, December 23, 2015 3:51 PM  
**To:** Hill, Margaret A.  
**Subject:** FW: DELCORA Additional Early Action Items  
**Attachments:** Delaware Interceptor Relief Line.docx; Elimination of CSO 032.docx  
  
**Importance:** High

---

**From:** Hill, Margaret A.  
**Sent:** Wednesday, October 14, 2015 4:24 PM  
**To:** Mollo, Marcello (ENRD); 'Yeany, Philip'  
**Subject:** DELCORA Additional Early Action Items  
**Importance:** High

Marcello and Phil ~

Good afternoon, I hope that you are both well.

While it may have taken some time to negotiate the settlement, I wanted you to know how seriously DELCORA is taking its obligations. Please see the attached for two more “early action items” that DELCORA is implementing, and the note below that was sent to me from Mike DiSantis with the attachments. Regards, Margaret

As discussed in our recent phone call, please find attached a brief description of the two items that we have in the works for eliminating CSO discharges. Hopefully EPA will see the good faith we are showing and consider that when evaluating our performance regarding the Consent Decree.

## **ELIMINATION OF CSO 032**

### **AVENUE OF THE STATES BETWEEN SECOND STREET AND SR 291**

The purpose of this project is the elimination of the combined sewer flows in the combined sewer line in the Avenue of the States between Second Street and SR 291 and any combine flows discharging at CSO 032 in the City of Chester.

The scope of work will include the construction of a new sanitary sewer in the Avenue of the States, connecting all existing sanitary laterals to the new line, capping off the existing combined sewer line to the Ridley Creek Interceptor, and connecting the new sanitary line to the Ridley Creek Interceptor.

Any roof down spouts connected to the existing laterals will be disconnected and allowed to drain to the new storm sewer system. As a result of the above work the existing CSO 032 outfall will be converted to a storm sewer outfall as the existing combined sewer would then only be used to collect storm water.

## **Delaware Interceptor Relief Line**

Currently, following any significant rain event, it takes more than 24 hours following the event for the Delaware Interceptor to recover. During this time period, up to three CSO Outfalls – 004, 005, and 007, may discharge past the post 24 hour period allowed in the Consent Decree. Following the rain event on 9/10, which was the first significant rain that occurred after the date of signing, DELCORA O&M staff set up a temporary relief line which pumped from the Delaware Interceptor to DELCORA's Stadium Pump Station. By pumping from the interceptor to the pump station, the level in the interceptor was lowered thereby stopping the discharge at the aforementioned CSO Outfalls.

Based on this success, DELCORA has authorized an engineering firm to design a permanent relief line and pump station which would be automatically engaged following a rain event. That design is currently underway. Once the design is complete, DELCORA will use its Emergency Sewer Maintenance Contractor to install the permanent system to expedite the completion of the project. Also in an effort to complete this work as quickly as possible, on the October Board of Director's meeting agenda is the approval of the purchase of the pump to be used for this system.

Until the permanent system is in place, DELCORA will maintain the temporary system and use it as needed. As an example, during the recent significant rain event that began on 10/1, the temporary system was utilized and there were no CSO discharges beyond the 24 hour post rain period.



# Appendix 3

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## NPDES Permit Exceedance Report





## INSTRUCTIONS FOR COMPLETING NON-COMPLIANCE REPORTING FORM

Use this supplemental form to report all permit violations and any other non-compliance that may endanger health or the environment, in accordance with your permit. Complete all sections that apply. If you are reporting violations of permit limits, monitoring requirements or schedules that do not pose an immediate threat to health or the environment, you may attach this form to the Discharge Monitoring Report (DMR). If you are reporting other non-compliance events, and the deadline for a written report (e.g., 5 days) does not coincide with your submission of the DMR, this form should be submitted separately to the Department by the reporting deadline set forth in the permit.

**If you are unsure of whether an incident constitutes non-compliance that may endanger health or the environment, it is recommended that you notify the Department verbally as soon as possible after you become aware of the incident. Title 25, Pa. Code §§ 91.33 and 91.34 (regarding incidents causing or threatening pollution and activities utilizing pollutants, respectively), in part requires immediate notification by telephone to the Department of pollution incidents, remediation, and may require an additional report on the incident or plan of pollution prevention measures.**

### Instructions:

1. Enter the name of the facility, the municipality and county where it is located, the month and year when violations occurred, and the NPDES or WQM permit number for the facility.
2. If there were violations of permit effluent limitations during the month, check the box next to "Violations of Permit Effluent Limitations." (Note – if using the electronic version of this form, check the boxes first, and then select Tools – Unprotect Document to enter additional information). Enter the date of the violation (if a violation of a minimum or maximum limit, the date of sample collection, or if a violation of an average limit, the end of the monitoring period), the parameter name, the permit limit and units, the statistical code (e.g., "MIN", "MAX", "MO AVG", etc.), the measured result and units, the cause of the violation and the corrective action taken. **If there are more than two violations during the monitoring period and/or if the space provided is insufficient to explain the cause or corrective action, please attach additional pages.**
3. If there are Sanitary Sewer Overflow (SSO) discharges or other unauthorized discharges from the facility (e.g., spills, leaks, etc.) that enter or have the potential to enter waters of the Commonwealth, including groundwater, notify DEP by phone as soon as possible, and document the discharge on this form by checking the box next to "Sanitary Sewer Overflows and Other Unauthorized Discharges." Record the event (discharge) date, the substance discharged (e.g., sewage, on-site chemicals, etc.), the location where the discharge occurred (e.g., manhole number, pump station name, equipment description, etc.), the volume discharged (gallons), the approximate duration of the discharge (hours), the receiving waters (name of stream or groundwater), the impact on the receiving waters, if observed (e.g., solids deposition, foam, fish kill, etc.), the cause of the discharge, and the date on which the Department was verbally notified. **If there are more than two discharge events during the monitoring period and/or if the space provided is insufficient to explain the discharge, please attach additional pages.**
4. If there are other violations of the permit, check the box next to "Other Permit Violations," and check the appropriate box that describes the violation type. If not identified on the form, check the box next to "Other" and provide a written explanation. **If the space provided is insufficient to explain the violation, please attach additional pages.**
5. Type your name and title and sign and date the form after reading the certification statement.

If you have questions about completing this form, contact the Clean Water Program Operations Section of the Department in your region:

Southeast Region – (484) 250-5970  
Northeast Region – (570) 826-2553  
Southcentral Region – (717) 705-4707

Northcentral Region – (570) 327-0532  
Southwest Region – (412) 442-4060  
Northwest Region – (814) 332-6942



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT

## NON-COMPLIANCE REPORTING FORM

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Facility Name: DELCORA STP Month: August Year: 2015  
Municipality: City of Chester County: Delaware Permit No.: PA0027103 A3

☐ **Violations of Permit Effluent Limitations\***

Date	Parameter	Permit Limit	Units	Statistical Code	Result	Units	Cause of Violation	Corrective Action Taken

☐ **Sanitary Sewer Overflows and Other Unauthorized Discharges\***

Event Date	Substance Discharged	Location	Volume (gals)	Duration (hrs)	Receiving Waters	Impact on Waters	Cause of Discharge	Date DEP Notified

☒ **Other Permit Violations\***

- ☐ Sample collection less frequent than required  
☐ Sample type not in compliance with permit  
☐ Violation of permit schedule  
☒ Other  
☐ Other

Explain \_\_\_\_\_  
 Explain \_\_\_\_\_  
 Explain \_\_\_\_\_  
 Explain Failure to monitor for influent and effluent cBOD5 on 08/16/2015 due to laboratory error.  
 Explain \_\_\_\_\_

**\*If the space provided is not sufficient to record all information, please attach additional sheets.**

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Prepared By: Michael J. DiSantis

Signature: \_\_\_\_\_

Title: Director of Operations and Maintenance

Date: 09/23/2015 70



## INSTRUCTIONS FOR COMPLETING NON-COMPLIANCE REPORTING FORM

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**If you are unsure of whether an incident constitutes non-compliance that may endanger health or the environment, it is recommended that you notify the Department verbally as soon as possible after you become aware of the incident. Title 25, Pa. Code §§ 91.33 and 91.34 (regarding incidents causing or threatening pollution and activities utilizing pollutants, respectively), in part requires immediate notification by telephone to the Department of pollution incidents, remediation, and may require an additional report on the incident or plan of pollution prevention measures.**

### Instructions:

1. Enter the name of the facility, the municipality and county where it is located, the month and year when violations occurred, and the NPDES or WQM permit number for the facility.
2. If there were violations of permit effluent limitations during the month, check the box next to "Violations of Permit Effluent Limitations." (Note – if using the electronic version of this form, check the boxes first, and then select Tools – Unprotect Document to enter additional information). Enter the date of the violation (if a violation of a minimum or maximum limit, the date of sample collection, or if a violation of an average limit, the end of the monitoring period), the parameter name, the permit limit and units, the statistical code (e.g., "MIN", "MAX", "MO AVG", etc.), the measured result and units, the cause of the violation and the corrective action taken. **If there are more than two violations during the monitoring period and/or if the space provided is insufficient to explain the cause or corrective action, please attach additional pages.**
3. If there are Sanitary Sewer Overflow (SSO) discharges or other unauthorized discharges from the facility (e.g., spills, leaks, etc.) that enter or have the potential to enter waters of the Commonwealth, including groundwater, notify DEP by phone as soon as possible, and document the discharge on this form by checking the box next to "Sanitary Sewer Overflows and Other Unauthorized Discharges." Record the event (discharge) date, the substance discharged (e.g., sewage, on-site chemicals, etc.), the location where the discharge occurred (e.g., manhole number, pump station name, equipment description, etc.), the volume discharged (gallons), the approximate duration of the discharge (hours), the receiving waters (name of stream or groundwater), the impact on the receiving waters, if observed (e.g., solids deposition, foam, fish kill, etc.), the cause of the discharge, and the date on which the Department was verbally notified. **If there are more than two discharge events during the monitoring period and/or if the space provided is insufficient to explain the discharge, please attach additional pages.**
4. If there are other violations of the permit, check the box next to "Other Permit Violations," and check the appropriate box that describes the violation type. If not identified on the form, check the box next to "Other" and provide a written explanation. **If the space provided is insufficient to explain the violation, please attach additional pages.**
5. Type your name and title and sign and date the form after reading the certification statement.

If you have questions about completing this form, contact the Clean Water Program Operations Section of the Department in your region:

Southeast Region – (484) 250-5970  
Northeast Region – (570) 826-2553  
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Northcentral Region – (570) 327-0532  
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Northwest Region – (814) 332-6942



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT

## NON-COMPLIANCE REPORTING FORM

Use this supplemental form to report all permit violations and any other non-compliance that may endanger health or the environment, in accordance with your permit. Complete all sections that apply. If you are reporting violations of permit limits, monitoring requirements or schedules that do not pose an immediate threat to health or the environment, you may attach this form to the Discharge Monitoring Report (DMR). **Title 25, Pa. Code §§ 91.33 and 91.34 (regarding incidents causing or threatening pollution and activities utilizing pollutants, respectively), in part requires immediate notification by telephone to the Department of pollution incidents, remediation, and may require an additional report on the incident or plan of pollution prevention measures.** If you are reporting other non-compliance events, and the reporting deadline does not coincide with your submission of the DMR, it should be submitted separately to the Department by the reporting deadline set forth in the permit. See instructions for more information.

Facility Name: DELCORA STP Month: September Year: 2015  
Municipality: City of Chester County: Delaware Permit No.: PA0027103 A3

☒ **Violations of Permit Effluent Limitations\***

Date	Parameter	Permit Limit	Units	Statistical Code	Result	Units	Cause of Violation	Corrective Action Taken
09/30/2015	Fecal Coliform	1000	CFU/100mL	instantaneous maximum	2080	CFU/100mL	unknown as TRC was in target operating range	N/A

☐ **Sanitary Sewer Overflows and Other Unauthorized Discharges\***

Event Date	Substance Discharged	Location	Volume (gals)	Duration (hrs)	Receiving Waters	Impact on Waters	Cause of Discharge	Date DEP Notified

☒ **Other Permit Violations\***

- ☐ Sample collection less frequent than required  
☐ Sample type not in compliance with permit  
☐ Violation of permit schedule  
☒ Other

Explain

Explain

Explain

Explain

The results from monitoring for effluent Oil and Grease the period of 09/02/2015-09/29/2015 were invalid due to laboratory error.

☐ Other

Explain

**\*If the space provided is not sufficient to record all information, please attach additional sheets.**

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Prepared By: Michael J. DiSantis

Signature: 72.

Title:

Director of Operations and Maintenance

Date:

10/23/2015





# Appendix 4

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## CSOs, SSOs and Unpermitted Discharges Correspondence



**Sanitary Sewer Overflow (SSO) Report to PADEP- Water Management**
**DEP fax: 484-250-5971**

 Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Michael DiSantis      610-876-5523 ext. 264      7/7/15
2. Your organization name and address ?	Name: DELCORA County: Delaware      Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 7/7/15      Municipality: Chester City Location: 3201 W. Front Street (WRTP)      County: Delaware
4. How was SSO discovered? By whom ?	Plant staff observed manholes on plant recycle flow (PRF) pump station gravity line overflowing.
5. Start and end time of SSO (actual or estimate?)	The incident happened at approximately 12:30 PM and lasted approximately 45 minutes.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 7/7/15 Time : 1:45 PM Name : Michael DiSantis (by filing of report)
7. Description and actual or estimated volume of SSO	Volume unknown but estimated to be >1,000 gallons. Plant recycle flow consists of sanitary waste, sludge dewatering and thickening filtrate, and secondary clarifier scum flow.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Wastewater spilled onto asphalt around manholes of gravity line to pump station with some flow entering a storm water inlet between buildings B-3 and B-4 and a storm water inlet near tank T-27 in the plant.
9. What caused SSO ? How was it stopped ?	Overflow was caused by too much flow to the pump station as one of the primary tanks was being drained to perform maintenance. The overflow ceased by closing the drain valve on the primary tank being drained.
10. Describe extent of contamination and how it was cleaned up	Wastewater puddled on asphalt around manholes. Material was hosed down and a vac truck was used to remove wastewater. The storm water inlet where some of the flow went was cleaned as was subsequent inlets further downstream on the storm water line. No waste was discharged from the storm water line into the river.
11. What actions will be taken to prevent a re-occurrence ? When ?	A portable back-up pump is being placed in service to add additional capacity to the station and to prevent recurrence.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 7/16/15 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 7/16/15 Municipality: Chester city Location( Street & #): Front and Hayes CSO #004 County: Delaware
4. How was SSO discovered? By whom ?	Delcora crew
5. Start and end time of SSO (actual or estimate?)	Cso 004 last checked at 11:05am 7/15/15 Heavy downpours during the day 7/15/15.No actual start time,CSO overflow stopped at 6:24am on 7/16/15.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	M. Warholic via report
7. Description and actual or estimated volume of SSO	Unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Delaware river
9. What caused SSO ? How was it stopped ?	Sticks partially blocking regulator line. Crew removed sticks and flow dropped to normal levels
10. Describe extent of contamination and how it was cleaned up	N/A
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with CSO visual checks
12. Other comments ?	None
13.Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 8/27/15 Name : Joe Centrone Phone # : 610-876-5523 x244
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 8/26/15 Municipality: Chester City Location( Street & #): Manhole #1779 in front of 2753 Bethel Road County: Delaware
4. How was SSO discovered? By whom ?	Notified by Chester Water Authority crew working on Bethel Road.
5. Start and end time of SSO (actual or estimate?)	Start Time: Approximately 2:15 PM End Time: Approximately 2:40 PM
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 8/26/15 Time : 2:45 PM Name: Joe Centrone
7. Description and actual or estimated volume of SSO	Manhole overflowed due to unknown blockage. Amount overflow is unknown.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Overflow ran down street and into storm water inlets which are part of the combined sewer system.
9. What caused SSO ? How was it stopped ?	Unknown blockage in 8" sanitary sewer line which was cleared by high pressure flushing/vacuum combination truck.
10. Describe extent of contamination and how it was cleaned up	Overflow was diluted with potable water from Chester Water Authority pipe replacement running in street so no clean up was necessary. Extent of contamination is unknown but no apparent negative impact.
11. What actions will be taken to prevent a re-occurrence ? When ?	Lines in this area are cleaned on a yearly basis. Special attention will be paid to area to prevent further occurrences.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

Please check the appropriate box ☐ Dry Weather Overflow ☒ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 9/14/15 Name : Michael J. DiSantis Phone # : (610) 876-5523 ext. 264
2. Your organization name and address ?	Name: DELCORA County: Delaware Township/Municipality: Address: P.O. Box 999, Chester, PA 19016
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 9/10/15 Location( Street & #): Central Delaware PS Sellers Avenue Municipality: Ridley Township County: Delaware
4. How was SSO discovered? By whom ?	Overflow was observed by on-site DELCORA personnel.
5. Start and end time of SSO (actual or estimate?)	Start: Approximately 10:55 PM Stopped: Approximately 11:55 PM
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 9/11/15 Time : Approximately 7:56 AM Name : Dave Voshelle
7. Description and actual or estimated volume of SSO	Sanitary wastewater, volume unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Overflow flowed to a tributary of Darby Creek that is adjacent to the pump station.
9. What caused SSO ? How was it stopped ?	Heavy rain caused very high flows to the station. All pumps were in service during bypass. Bypass ended when flow to station went below capacity of station.
10. Describe extent of contamination and how it was cleaned up	No debris or contamination observed as creek level was very high, muddy, and flowing rapidly at the time of the overflow.
11. What actions will be taken to prevent a re-occurrence ? When ?	N/A
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	None

Please check the appropriate box ☐ Dry Weather Overflow ☒ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 9/14/15 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 9/11/15 Municipality: Nether Providence /Chester border Location( Street & #): Taylor Arboretum - Ridley Interceptor MH # 2875 County: Delaware
4. How was SSO discovered? By whom ?	Delcora crew during post rain event check of known past sites of overflows found evidence of an overflow. No overflow observed at the time of the check.
5. Start and end time of SSO (actual or estimate?)	Started sometime during heavy rainfall late 9/10. End unknown.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Phone notification 9/11/15 @ 10:54am M. Warholic
7. Description and actual or estimated volume of SSO	Unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Grassy area next to manhole
9. What caused SSO ? How was it stopped ?	Heavy rainfall surcharging Ridley Interceptor was the cause. Stopped when rain subsided.
10. Describe extent of contamination and how it was cleaned up	No debris, minimal signs of discharge. Cleaned small area around manhole
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with O&M program
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

**Sanitary Sewer Overflow (SSO) Report to PADEP- Water Management**
**DEP fax: 484-250-5971**

 Please check the appropriate box ☐ Dry Weather Overflow ☒ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Michael DiSantis      610-876-5523 ext. 264      9/14/15
2. Your organization name and address ?	Name: DELCORA County: Delaware      Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 9/11/15      Municipality: Chester City Location: 3201 W. Front Street (WRTP)      County: Delaware
4. How was SSO discovered? By whom ?	Plant staff observed manhole on plant recycle flow (PRF) pump station gravity line overflowing.
5. Start and end time of SSO (actual or estimate?)	The incident happened at approximately 12:15 AM and ended at pproximately 1:45 AM.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 9/11/15 Time : 7:56 AM Name : Dave Voshelle
7. Description and actual or estimated volume of SSO	Volume unknown. Plant recycle flow consists of sanitary waste, sludge dewatering and thickening filtrate, and secondary clarifier scum flow.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Wastewater spilled onto asphalt around manhole of gravity line adjacent to secondary clarifier T-27 pump station entering a storm water inlet in this area of the plant.
9. What caused SSO ? How was it stopped ?	Overflow was caused by very high peak flow through the plant of 109 MGD which surcharged the secondary clarifiers thereby raising the tanks' level causing flow to enter the scum troughs overwhelming the PRF pump station. Contributing to the surcharge was chlorine contact tanks T-19 and T-21 were out of service for maintenance at the time of the storm event. SSO stopped when flow through plant subsided some and tanks T-19 and T-21 were put back into service.
10. Describe extent of contamination and how it was cleaned up	Wastewater puddled on asphalt around manhole and flowed into the grassy area around T-27 as well as across the driveway and into a storm water inlet. Once overflow ended, any debris in area was cleaned up.
11. What actions will be taken to prevent a re-occurrence ? When ?	
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A



Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 9/14/15 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 9/12/15 Municipality: Chester city Location( Street & #): Front and Hayes CSO #004 County: Delaware
4. How was SSO discovered? By whom ?	Delcora crew during daily CSO checks.
5. Start and end time of SSO (actual or estimate?)	Start time unknown - ended 9/12/15 at 8:40am.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	9/12/15 at 10:22 AM by M. Warholic
7. Description and actual or estimated volume of SSO	Unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Delaware river
9. What caused SSO ? How was it stopped ?	Blockage in crossover line from regulator mechanism to Interceptor. Removed debris that washed down line from heavy rain event then discharge ended.
10. Describe extent of contamination and how it was cleaned up	N/A
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with O&M program that includes daily checks
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 9/14/15 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 9/12/15 Municipality: Chester city Location( Street & #): Townsend st. CSO #005 County: Delaware
4. How was SSO discovered? By whom ?	Delcora crew during daily CSO checks.
5. Start and end time of SSO (actual or estimate?)	Started during rainfall event on 9/10 which ended by 12:00 AM on 9/11. At time of check on 9/12, interceptor had still not recovered from rain event so discharge continued past 24 hours post rain event. Rain event on 9/12 started approximately 7:00 PM and ended by 12:00 AM on 9/13. Crew checked outfall on 9/13/15 at 8:14 AM and no discharge observed.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	9/12/15 at 10:22 AM by M. Warholic
7. Description and actual or estimated volume of SSO	Unknown at this time. Flow will be calculated by model for DMR submission.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Delaware River
9. What caused SSO ? How was it stopped ?	Flow started due to rain event. Stopped when interceptor recovered from rain event.
10. Describe extent of contamination and how it was cleaned up	N/A
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with O&M program that includes daily checks.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 9/14/15 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 9/12/15 Municipality: Chester city Location( Street & #): Rainey st. CSO #007 County: Delaware
4. How was SSO discovered? By whom ?	Delcora crew during daily CSO checks.
5. Start and end time of SSO (actual or estimate?)	Started during rainfall event on 9/10 which ended by 12:00 AM on 9/11. At time of check on 9/12, interceptor had still not recovered from rain event so discharge continued past 24 hours post rain event. Rain event on 9/12 started approximately 7:00 PM and ended by 12:00 AM on 9/13. Crew checked outfall on 9/14/15 at approximately 7:30 AM and outfall still discharging as interceptor had still not recovered from rain event so discharge continued past 24 hours post rain event. On 9/14, a temporary interceptor relief pumping system was set up which pumped flow from the interceptor to our Stadium Pump Station. This successfully lowered the level in the interceptor and the discharge
6. Date, time and name of person who called PADEP originally to notify of SSO ?	9/12/15 at 10:22 AM by M. Warholic
7. Description and actual or estimated volume of SSO	Unknown at this time. Flow will be calculated by model for DMR submission.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Delaware River
9. What caused SSO ? How was it stopped ?	Flow started due to rain event.
10. Describe extent of contamination and how it was cleaned up	N/A
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with O&M program that includes daily checks. Also, we will be formalizing the interceptor relief pumping system as this area is prone to slow recovery following rain events. Until the system is made permanent, we will continue with temporary pumping on an as-needed basis.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

Phone: (215) 569-5331  
Fax: (215) 832-5331  
Email: [MHill@BlankRome.com](mailto:MHill@BlankRome.com)

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November 11, 2015

cc: LTOP  
Group

Chief, Environmental Enforcement  
Section  
Environmental and Natural Resources  
Division  
U.S. Department of Justice  
P.O. Box 7611, Ben Franklin Station  
Washington, DC 20044-7611

Philip Yeany  
Office of Regional Counsel {3RC20}  
U.S. Environmental Protection Agency,  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Chief  
NPDES Enforcement Branch {3WP42}  
Water Protection Division  
t.J.S. Environmental Protection  
Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

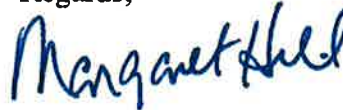
Program Manager —Clean Water Program  
Department of Environmental Protection  
Southeast Regional Office  
2 E. Main Street  
Norristown, PA 19401

Re: Notice of Violation  
DOJ No. 90-5-1-1-10972

Dear Sirs/Madams:

By this letter, the Delaware County Regional Water Quality Control Authority (DELCORA) is advising that a SSO event occurred on November 6, 2015. I am attaching a report prepared by DELCORA for your review which provides the details associated with the event.

Regards,



MARGARET ANNE HILL

Enclosure

cc: Robert J. Willert, DELCORA ✓

# Sanitary Sewer Overflow (SSO) Report to PADEP- Water Management

DEP fax: 484-250-5971

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Michael DiSantis 610-876-5523 ext. 264 11/9/15
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 11/6/15 Municipality: Chester City Location: 3201 W. Front Street (WRTP) County: Delaware
4. How was SSO discovered? By whom ?	Plant staff observed manhole on plant recycle flow (PRF) pump station gravity line overflowing.
5. Start and end time of SSO (actual or estimate?)	The incident happened at approximately 12:36 PM and ended at pproximately 12:42 PM.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 11/6/15 Time : 1:00 PM Name : Dave Voshelle
7. Description and actual or estimated volume of SSO	Volume unknown. Plant recycle flow consists of sanitary waste, sludge dewatering and thickening filtrate, and secondary clarifier scum flow.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Wastewater spilled onto asphalt around manholes of gravity line to the pump station.
9. What caused SSO ? How was it stopped ?	Overflow was caused by the tripping of the main breaker for the pump station. Breaker was reset and normal operation resumed.
10. Describe extent of contamination and how it was cleaned up	Wastewater puddled on asphalt around manholes and flowed across driveway. Due to the short duration of the event, no overflow entered a storm drain inlet. Any accumulated debris and liquid was removed.
11. What actions will be taken to prevent a re-occurrence ? When ?	DELCORA Electrical Staff is investigating the cause of the failure. Until the cause is known and addressed, a temporary back-up pump has been put in place to address any potential subsequent failures.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

Please check the appropriate box ☐ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Michael DiSantis      610-876-5523 ext. 264      12/24/15
2. Your organization name and address ?	Name: DELCORA County: Delaware      Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 12/23/15      Municipality: Chester City Location: 3201 W. Front Street (WRTP)      County: Delaware
4. How was SSO discovered? By whom ?	Plant staff observed manholes on plant recycle flow (PRF) pump station gravity line overflowing.
5. Start and end time of SSO (actual or estimate?)	The incident started at approximately 4:00 PM and ended at pproximately 5:30 PM.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 12/23/15 Time : Approximately 4:45 PM Name : Tom Czwalina
7. Description and actual or estimated volume of SSO	Volume unknown. Plant recycle flow consists of sanitary waste, rain water from truck waste containment areas, sludge dewatering and thickening filtrate, and secondary clarifier scum flow.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Wastewater spilled onto asphalt around manholes of gravity line to the pump station.
9. What caused SSO ? How was it stopped ?	Overflow was caused by a failure of one of the two pumps in the station. Overflow was stopped when a portable stand-by pump was put into service.
10. Describe extent of contamination and how it was cleaned up	Wastewater flowed on to asphalt around manholes and flowed across driveway. With some of the overflow entering storm drain inlets. Due to rain event, there was no accumulated debris so no clean up was needed.
11. What actions will be taken to prevent a re-occurrence ? When ?	
12. Other comments ?	Additional stand-by pumps have been added to the system until a permanent repair can be made. This station is scheduled to be replaced during an upgrade that is underway.
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A





[www.delcora.org](http://www.delcora.org)

Delaware County Regional Water Quality Control Authority

100 E. Fifth Street  
P.O. Box 999  
Chester, PA 19013