

DOCKET NO. D-2015-015 CP-2

DELAWARE RIVER BASIN COMMISSION

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

PROCEEDINGS

This docket is issued in response to an application submitted to the Delaware River Basin Commission (DRBC or Commission) on December 9, 2019 for renewal of the docket holder's existing Norristown Water Filtration Plant (WFP) and its filter backwash discharge. National Pollutant Discharge Elimination System (NPDES) Permit No. PA0244775 for this facility was issued by the Pennsylvania Department of Environmental Protection (PADEP) on February 2, 2016.

The Application was reviewed for inclusion in the Comprehensive Plan and for approval under Section 3.8 of the *Delaware River Basin Compact*. The Montgomery County Planning Commission has been notified of pending action on this docket. A public hearing on this project was held by the DRBC on May 12, 2021.

A. DESCRIPTION

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

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

Specific location information has been withheld for security reasons.

3. **Area Served.** The docket holder’s WFP will continue to serve the Boroughs of Norristown and Bridgeport and portions of Lower Providence, West Norriton, East Norriton, Plymouth, Whitpain, Perkiomen, Upper Merion, Whitemarsh and Worchester Townships all in Montgomery County, Pennsylvania. The service area is outlined on a map entitled “Norristown Existing Service Area Map” submitted with the Application. For the purpose of defining Area Served, the Application is incorporated herein by reference consistent with conditions contained in the DECISION section of this docket.

4. **Design Criteria.** The docket holder’s WFP will continue to treat up to 18.0 mgd of surface water for public water supply. Process wastewater containing residuals from the WFP treatment processes are treated via clarification. WFP will continue to intermittently discharge of up to 1.93 mgd (maximum daily flow) of this clarifier supernatant to the Schuylkill River under certain conditions via Outfall 001.

5. **Facilities.** The WFP treats raw intake surface water utilizing coagulation in two (2) tanks (primarily through ferric chloride addition), high-rate clarification in four (4) SuperPulsator clarifiers, filtering in a granulated activated carbon (GAC) filter unit, and chemical disinfection. Process wastewater from the treatment process consists of sludge blowdown from the SuperPulsator clarifiers and backwash water generated during the filter cleaning process. This process wastewater is directed to two (2) wastewater clarifiers, after which clarifier supernatant is recycled back to the head of the WFP, and sludge is directed to a sludge thickener, dewatered using two (2) centrifuges, and then sent off-site for disposal.

The wastewater clarifier supernatant is discharged to the Schuylkill River under NPDES Permit No. PA0244775. The discharge is via Outfall 001 which is located approximately 200 feet upstream of the docket holder’s surface water intake. Discharge occurs infrequently, at times when recycling the supernatant back to the head of the WFP would have a negative impact on the water treatment process or finished water quality. The two scenarios in which a discharge could occur are 1) when the clarifier supernatant may have a negative impact on the water treatment process or finished water quality, and 2) when recycle rates are greater than 10% of plant flow.

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

6. **Water Withdrawals.** The potable water supply for this facility is from the docket holder’s system and is described in detail in Docket No. D-1966-100 CP-2, which was approved on September 14, 2016.

7. **NPDES Permit.** NPDES Permit No. PA0244775 issued by the PADEP includes final effluent limitations for the project discharge to surface waters classified by the PADEP as Warm Water Fishes (WWF) and Migratory Fishes (MF). EFFLUENT TABLES C-1 & C-2 included in Section C. DECISION Condition C.1. of this docket, contain effluent requirements for DRBC parameters that must be met as a condition of this approval. Effluent requirements for Outfall No. 001 are based on a discharge rate of 1.93 mgd.

8. **Relationship to the Comprehensive Plan.** The WFP was added to the Comprehensive Plan via Docket No. D-2015-015 CP-1 approved on December 9, 2015. Issuance of this docket will continue the discharge project in the Comprehensive Plan.

B. FINDINGS

The purpose of this docket is to renew the approval of an intermittent discharge of up to 1.93 mgd of process water from the docket holder's existing 18.0 mgd Norristown WFP. The WFP allows for clarifier supernatant to be directed to an existing stormwater outfall on the Schuylkill River. There are no modifications to the WFP treatment facilities proposed.

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

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

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

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

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

C. DECISION

Effective on the approval date for Docket No. D-2015-015 CP-2 below, the project described in Docket No. D-2015-015 CP-1 is removed from the Comprehensive Plan to the extent that they are not included in Docket No. D-2015-015 CP-2; Docket No. D-2015-015 CP-1 is terminated and replaced by Docket No. D-2015-015 CP-2; and the project and the appurtenant facilities described in Section A. DESCRIPTION of this docket shall be continued in the Comprehensive Plan. The project and appurtenant facilities as described in Section A of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

Monitoring and Reporting

1. The docket holder shall comply with the requirements contained in the EFFLUENT TABLES below. The docket holder shall submit the required monitoring results electronically to the DRBC Project Review Section via email aemr@drbc.state.nj.us on the **Annual Effluent Monitoring Report Form** located at this web address: <http://www.state.nj.us/drbc/programs/project/pr/info.html>. The monitoring results shall be submitted annually, absent any observed limit violations, by January 31. If a DRBC effluent limit is violated, the docket holder shall submit the result(s) to the DRBC within 30 days of the violation(s) and provide a written explanation that states the action(s) the docket holder has taken to correct the violation(s) and protect against any future violations. The following average monthly effluent limits are among those listed in the NPDES Permit and meet or are more stringent than the effluent requirements of the DRBC.

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

OUTFALL 001 (Discharge to the Schuylkill River)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	As required by NPDES permit
Total Suspended Solids	30 mg/l	As required by NPDES permit

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

OUTFALL 001 (Discharge to the Schuylkill River)		
PARAMETER	LIMIT	MONITORING
Total Dissolved Solids*	1,000 mg/l	Quarterly

* See DECISION Condition C.3.

Other Conditions

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

- 3.** The docket holder may request of the Executive Director in writing the substitution of specific conductance for TDS. The request should include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow the substitution of specific conductance for TDS monitoring.
- 4.** The docket holder is responsible for timely submittal to the DRBC of a docket renewal application on the appropriate application form including the appropriate docket application filing fee (see 18 CFR 401.43) at least 6 months in advance of the docket expiration date set forth below. The docket holder will be subject to late filed renewal surcharges in the event of untimely submittal of its renewal application, whether or not DRBC issues a reminder notice in advance of the deadline or the docket holder receives such notice. In the event that a timely and complete application for renewal has been submitted and the DRBC is unable, through no fault of the docket holder, to reissue the docket before the expiration date below, the terms and conditions of the current docket will remain fully effective and enforceable against the docket holder pending the grant or denial of the application for docket approval.
- 5.** The docket holder is permitted to treat and discharge effluent as set forth in the Area Served Section of this docket, which incorporates by reference Sections B (Type of Discharge) and D (Service Area) of the docket holder's Application to the extent consistent with all other conditions of this DECISION Section.
- 6.** The docket holder is prohibited from treating/pre-treating any hydraulic fracturing wastewater from sources in or out of the Basin at this time. Should the docket holder wish to treat/pre-treat hydraulic fracturing wastewater in the future, the docket holder will need to first apply to the Commission to renew this docket and be issued a revised docket allowing such treatment and an expanded service area. Failure to obtain this approval prior to treatment/pre-treatment will result in action by the Commission.
- 7.** The facility and operational records shall be available at all times for inspection by the DRBC.
- 8.** The facility shall be operated at all times to comply with the requirements of the Commission's *WQR*.
- 9.** If at any time the receiving treatment plant proves unable to produce an effluent that is consistent with the requirements of this docket approval, no further connections shall be permitted until the deficiency is remedied.
- 10.** Nothing herein shall be construed to exempt the docket holder from obtaining all necessary permits and/or approvals from other State, Federal or local government agencies having jurisdiction over this project.
- 11.** The docket holder shall discharge effluent in such a manner as to avoid injury or damage to fish or wildlife and shall avoid any injury to public or private property.

- 12.** No sewer service connections shall be made to newly constructed premises with plumbing fixtures and fittings that do not comply with water conservation performance standards contained in Resolution No. 88-2 (Revision 2).
- 13.** The issuance of this docket approval shall not create any private or proprietary rights in the waters of the Basin, and the Commission reserves the right to amend, suspend or rescind the docket for cause, in order to ensure proper control, use and management of the water resources of the Basin.
- 14.** The docket holder shall be subject to applicable DRBC regulatory program fees, in accordance with duly adopted DRBC resolutions and/or regulations (see 18 CFR 401.43).
- 15.** This approval is transferable by request to the DRBC Executive Director provided that the project purpose and area served approved by the Commission in this docket will not be materially altered because of the change in project ownership. The request shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 CFR 401.43).
- 16.** The docket holder shall request a name change of the entity to which this approval is issued if the name of the entity to which this approval is issued changes its name. The request for name change shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 CFR 401.43).
- 17.** The Executive Director may modify or suspend this approval or any condition thereof, or require mitigating measures pending additional review, if in the Executive Director's judgment such modification or suspension is required to protect the water resources of the Basin.
- 18.** Any person who objects to a docket decision by the Commission may request a hearing in accordance with Article 6 of the Rules of Practice and Procedure. In accordance with Section 15.1(p) of the *Delaware River Basin Compact*, cases and controversies arising under the *Compact* are reviewable in the United States district courts.

BY THE COMMISSION

APPROVAL DATE: June 9, 2021

EXPIRATION DATE: February 28, 2026