City of Lancaster
OFFICE OF MAYOR, J. RICHARD GRAY

December 9, 2015

Mr. Sean Molchany
Township Manager-Secretary
Manheim Township
1840 Municipal Drive
Lancaster, Pennsylvania 17601

RE: Stormwater Discharges to the City's Combined Sewer System

Dear Mr. Molchany:

The City of Lancaster has been conveying and treating stormwater from areas of Manheim Township (MT) to the City's collection system since 1934. Originally, flows went to the City's North Sewage Treatment Works when it was placed into operation in 1934. When the North Sewage Treatment Works was decommissioned, they were then pumped and conveyed to the City Advanced Wastewater Treatment Plant on New Danville Pike. As regulatory demands have increased to reduce the discharge of pollutants to the Chesapeake Bay tributaries, the City can no longer provide this service at no cost. We are currently engaged in negotiation with the US Department of Justice, the US Environmental Protection Agency (EPA), and the PA Department of Environmental Protection (DEP) to develop a Long Term Control Plan (LTCP) to reduce combined sewer overflows to the Conestoga River. The Township's storm flows take up capacity in the City's sewer system and contribute to overflows at the relief point at the City's North Pumping Station. As part of this effort, sewer flow metering and precipitation measurements will take place throughout the sewer system over a six month period. The Manheim Township flows that are tributary to the City's sewer system will also be monitored. After the flows are metered, a sewer model will be developed to assist in planning and engineering long term capital improvements to reduce sewer overflows. This work will begin in March of 2016.

The purpose of this letter is to engage the Township in our efforts, as we are mutually responsible to reduce pollutants to the tributaries of the Chesapeake Bay. As you recall, the City met with the Township and DEP on January 28, 2014, and again with the Township, DEP and EPA on June 10, 2014.

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The City requests your financial participation in metering the Township's flows to the City's system and to start paying for the cost of treatment and conveyance of these flows. Enclosed is a map of the proposed discharge location points that will be monitored upon EPA/DEP approval. These metering points are labeled as MhT-1,2,3. These points meter Township stormwater, City sanitary sewer, and some City stormwater. It is impossible to meter just all the Township stormwater separately as it is connected to the City in many different ways. Based on MT's own mapping and current topographic information, MT's drainage area to the City's combined sewer system is approximately 315 acres with 170 acres of impervious area. Based on the City's Stormwater Fee, this would be $229,265 for the annual fee, based on the typical year. It is estimated that in the typical year, MT sends 77 million gallons of stormwater to the City's combined sewer system.

The City believes there are several options to reduce or remove the stormwater flows originating in the Township from entering the City's combined sewer system, thus decreasing or eliminating the fees incurred. The City met with the Township and DEP on January 28, 2014, and again with the Township, DEP and EPA on June 10, 2014. These options were mentioned in at least one of those meetings. One option might be the disconnection and redirection of stormwater flows into Groff's Run, a legacy stream bed located near McCaskey East High School's campus, to reestablish base flows and restore the stream. Preliminary investigation by the City indicates much of the Township's stormwater flows could be conveyed to Groff's Run via Ross Street and/or New Holland Avenue. Another option would be for the Township to disconnect its storm sewer and pump it to one of the Township's existing MS4 outfalls or a newly constructed outfall.

Please find enclosed the City's ordinance 1-2014 on Stormwater fees for your review. We are available to discuss our plans with you at your convenience. Should Manheim Township not begin taking efforts to reduce or move the stormwater flows originating in the Township from entering the City's combined sewer system, the City will have no alternative but to consider:

(1). Issuing appropriate notices under its Stormwater Management Ordinance and billing the Township according;

(2). Pursuing Court Orders directing Manheim Township to cease and desist from having its stormwater directed and diverted into the City stormwater system; and/or

(3). Asking EPA and DEP to join you in the ongoing action to which the City is a party for purposes of compelling you to develop a long term control plan to reduce and/or eliminate the flow of Manheim Township stormwater into the City's system.

Thank you for your attention. We look forward to working with you.

Sincerely,

J. Richard Gray
Mayor, City of Lancaster

cc:
Barry N. Handwerger, Esquire
Fredric P. Andes, Esquire
Charlotte Katzenmoyer, City of Lancaster, Director of Public Works
Donna Duer, Esquire, US Dept. of Justice
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