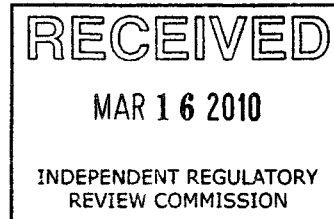




March 15, 2010

2819



Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477

Re: Proposed Replacement of 25 Pa.  
Code Chapter 92 with Chapter 92a

Dear Hearing Board:

On behalf of the Borough of Ambler, Environmental Engineering and Management Associates, Inc. (EEMA) has prepared the following few brief comments related to the proposed rescinding of 25 Pa. Code Chapter 92 and replacement with a new Chapter 92a:

1. The following statement is vague:

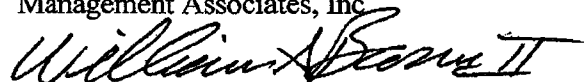
*The requirement to implement the TTS would be triggered by a proposed expansion of an existing facility that would result either in an increased hydraulic capacity of the facility, or an increase in loading of any pollutant of concern to the affected surface water, or both.*

What constitutes an increased loading of any pollutant of concern? It could be argued the next new connection adds flow and CBOD5, NH3-N, nitrogen, or phosphorus to an existing WWTP, and thereby increases the load to the receiving stream. This language should be revised to represent changes in permitted flow and permitted loads as identified in NPDES and WQM Permits.

2. While the description of the proposed regulations contains a statement that TTS requirements don't apply to existing facilities until they propose to expand, this limitation is not set forth in the actual regulations. Compare page 852 of the February 13 Pa. Bulletin with pages 867-868. The existing facility exclusion set forth in the description should be specifically included in Section 92a47(c) of the proposed regulations.
3. Do the proposed STS limits supercede DRBC Requirements? In particular, will the winter disinfection limits be relaxed from 200/100 ml to 2,000/100 ml for the winter months for WWTPs discharging within the Delaware River Basin?

4. In order to meet the monthly average total nitrogen concentration of 8 mg/l, it is very possible that any fixed-film WWTP would have to completely convert to activated sludge. This would make any expansion to accommodate future development cost prohibitive. Instead, municipalities would likely revise Act 537 Plans to allow small package plants or on-site systems. The proposed changes to Chapter 92 are not likely to encourage established WWTPs to convert processes and increase the level of treatment; rather, than will simply stifle economic development within the Commonwealth of Pennsylvania.
5. It is not clear how the proposed STS and TTS limits will be applied to streams that already have TMDLs.

Very truly yours,  
Environmental Engineering &  
Management Associates, Inc.



William A. Brown II, P.E.  
Principal Engineer

Cc: Mary Aversa – Borough Manager  
Bruce Jones – Ambler WWTP Superintendent  
Joseph Bresnan, Esq. – Solicitor, Ambler Borough

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**From:** William A. Brown II [wbrown@eema-inc.com]  
**Sent:** Monday, March 15, 2010 7:27 PM  
**To:** EP, RegComments  
**Subject:** Comments on Replacement of 25 PA.CODE CHS. 92 and 92a  
**Attachments:** Comments to EQB - Ch 92.pdf

Please see the attached comments related to 25 Pa Code Chapter 92.

Thank you.

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