EXHIBIT P2

EAST NORRITON TOWNSHIP ACT 537 PLAN
(SPECIAL STUDY 2009)

EAST NORRITON TOWNSHIP
Montgomery County, Pennsylvania

Act 537 Special Study

JANUARY 2009
REVISED AND APPENDED APRIL 2009

Prepared By:

GILMORE & ASSOCIATES, INC.
Engineers ♦ Land Surveyors ♦ Planners ♦ GIS Consultants
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TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

APPENDICES

1. East Norriton Township Planning Commission Meeting Minutes
2. Letter from Montgomery County Health Department
3. Letter from County Planning Commission and East Norriton Township Reply
4. Proof of Public Notice
5. Citizen's Comment Letter and East Norriton Township Reply
6. Adopting Resolution by East Norriton Township Board of Supervisors
7. Act 537 Plan Content and Environmental Assessment Checklist

1.0 SPECIAL STUDY EXECUTIVE SUMMARY

East Norriton Township (Township or ENT) owns and operates the municipal sanitary sewerage system in East Norriton Township, Montgomery County. Generally, all developed portions of the Township have access to public sewer facilities. All of the publicly managed wastewater generated in the Township flows to the Saw Mill Pump Station then to the wastewater treatment plant (WWTP). Both the Saw Mill Pump Station (located in the southeast corner of the Township) and the WWTP are owned by the East Norriton Plymouth Whitpain Joint Sewer Authority (ENPWJSA).

In April 2006, ENT adopted an Act 537 Sewage Facilities Management Plan prepared by EDM Consultants, Inc. Since adoption, all changes to the Act 537 Plan have been made using planning modules for proposed developments.

ENT is currently in the process of reviewing plans by Albert Einstein Healthcare Network for a 200 bed hospital and 2 story medical office building to be located on a site along Germantown Pike just east of Whitehall Road. The proposed project will consist of approximately 400 EDUs and generate 92,000 gallons of wastewater per day.

The Einstein Hospital proposal prompted ENT to reconsider its sewage management plan for that part of the Township in order to both accommodate the new development as well as address capacity limitations in adjacent sections of the sewer system. Therefore preparation of this Special Study was authorized with the concurrence of the Pennsylvania Department of Environmental Protection (PADEP).

Wastewater management alternatives available for consideration were limited to construction of new facilities and rehabilitation/repair of existing facilities. The selected alternative includes diverting flow from the Sandra Lane Pump Station (SLPS) to the Einstein Hospital site along with construction of a 440 gpm pump station and a 225,000 gallon surge storage tank at the Einstein Hospital site. The purpose of the surge storage tank is to insure that projected peak flows from the Germantown Pump Station service area and the Study Area will not exceed 2400 gpm at the downstream sewerage facilities. The opinion of probable project cost of these upgrades is approximately $2,100,000, not including land acquisition or Einstein Hospital internal sewers. It is expected that construction of the pump station and surge storage tank will be completed by the project sponsor for the Einstein Hospital site with some of the cost absorbed by the Township as a credit towards a portion of the project sponsor's tapping fee. The additional operational capacity gained from this construction is expected to be adequate for the 10 year planning period.

2.0 INTRODUCTION

East Norriton Township is a municipality of approximately 13,600 people located in southern Montgomery County. The Township is approximately six (6) square miles in area. Generally, all developed areas of the Township are served by public sewers that are owned and operated by ENT. The ENPWJSA owns and operates the receiving Saw Mill pump station and the 8.1 MGD ENPWJSA Wastewater Treatment Plant.

Representatives of East Norriton Township, ENPWJSA, Albert Einstein Healthcare Network, and Gilmore & Associates, Inc. met with representatives of PADEP on September 2, 2008. This meeting was held to discuss the options to service the proposed Einstein Hospital project as well as to provide reserve capacity for anticipated growth in the upstream Germantown Pump Station (GPS) sewer area and to assess the necessary requirements to update the current Act 537 Plan. As agreed upon by all parties at the meeting, the Special Study will focus on methods for sewering the proposed medical complex while minimizing impacts to the downstream sewer system and reducing peak flows at GPS. The study area includes the Einstein Hospital site and its frontage on Germantown Pike, the existing sewers along Whitehall Road and Marion Avenue, and the Sandra Lane Pump Station. Refer to Figure 1 for a site map of the study area.

This Special Study contains three (3) additional sections following this Introduction. It is consistent with the Guide for Preparing Act 537 Update Revisions as published by the PADEP in February 1998, updated January 2003, and the highly focused limited scope agreed upon at the September 2, 2008 meeting with PADEP. The sections of this Special Study include the following:

Section 3.0: Existing Demand and Future Growth

This section provides information regarding existing and future demand within the study area. Sewage planning needs for the future are described as related to the ten year planning period.

Section 4.0: Identification and Evaluation of Alternatives for Wastewater Management

This section identifies and provides an analysis of the alternatives available for providing adequate capacity for the Einstein Hospital, accommodating future development and reducing the hydraulic load on the Germantown Pump Station. Alternatives are evaluated for technical feasibility.

Section 5.0: Implementation

This section concludes the Special Study, and provides a short discussion of the selected alternative which best meets the sewage management needs of the Study Area. This section designates the capital financing plan chosen to implement the selected alternative. The implementation schedule for the recommended alternative is designated.

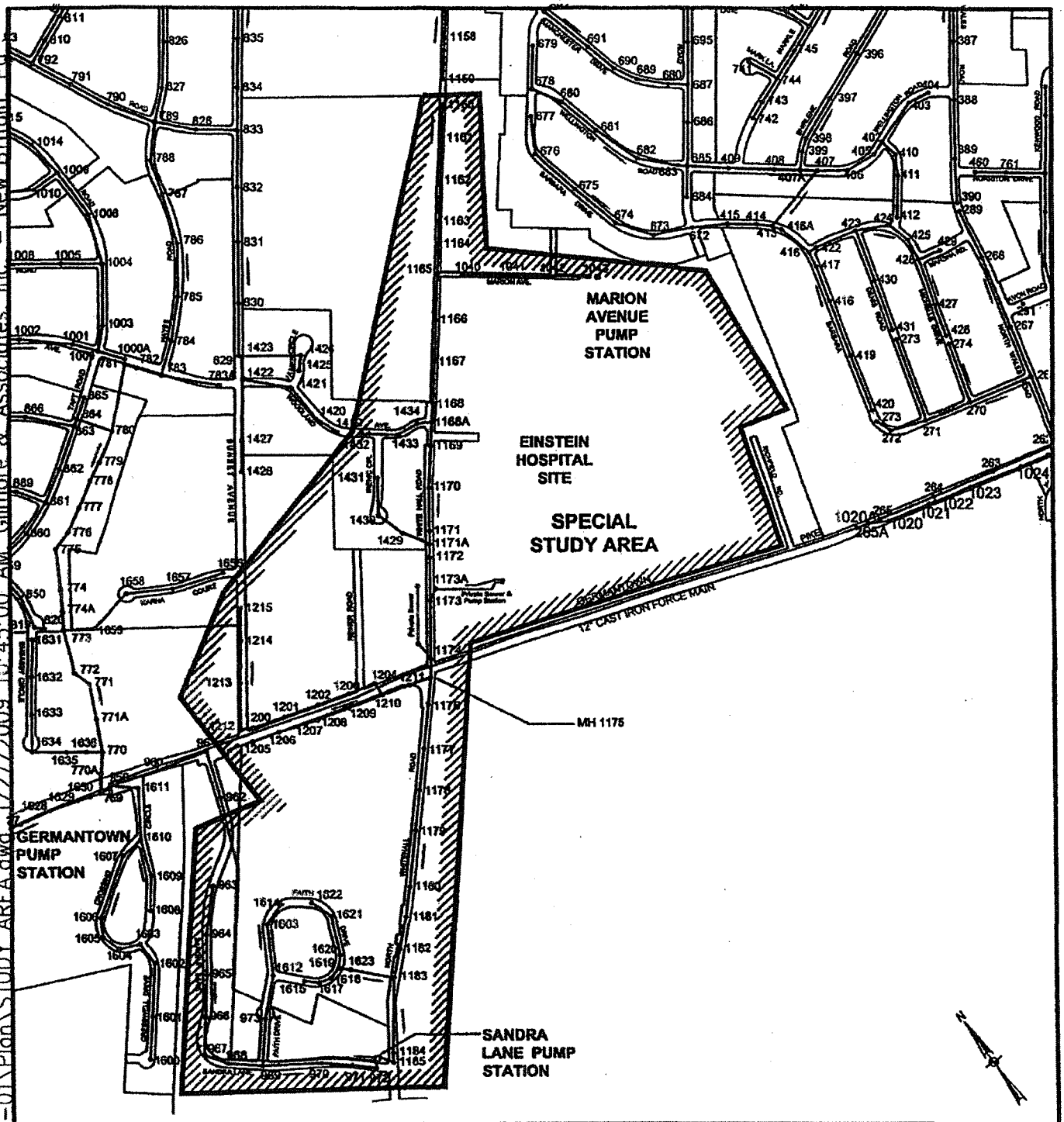

FIGURE 1: SPECIAL STUDY AREA

SANDRA LANE PS/EINSTEIN HOSPITAL

EAST NORRITON TOWNSHIP, MONTGOMERY COUNTY, PENNSYLVANIA

GILMORE & ASSOCIATES, INC.
CONSULTING ENGINEERS & LAND SURVEYORS
65 BUTLER AVENUE, NEW BRITAIN, PA 18901 (215) 345-4330
184 WEST MAIN STREET, SUITE 300, TRAPPE, PA 19426 (610) 489-4949

JOB NO.:	DATE:	SCALE:	SHEET:
08-04020-01	11-18-08	N.T.S.	1

J:\ENVIRO\2008\20080402O-01\Plan\STUDY AREA.dwg, 1/27/2009 10:45:00 AM, Gilmore & Associates, Inc. - New Britain, Pa

3.0 EXISTING DEMAND AND FUTURE GROWTH

The Germantown Pump Station is currently at capacity and in the recent past has experienced overflows during extreme wet weather events. The overflows at GPS have been greatly reduced through pump upgrades and the reduction of inflow and infiltration. In fact, the overflow pipe from the wet well was permanently blocked off in 2008. However, additional measures are considered necessary to accommodate future flows and eliminate the possibility of future overflows.

The GPS drainage basin is comprised of most of the Township west of Whitehall Road. Table 1 shows the 10 year growth (EDU's and flow) for the entire drainage basin except for portions that drain to SLPS, and Table 2 shows the 10 year growth (EDU's and flow) for all portions that drain to SLPS. Table 3 shows the current and future flows at GPS, including flow from SLPS. The Township has plans in progress to divert sewage from Marion Avenue within the GPS service area to the Timberlake Pump Station service area. The total GPS capacity is limited to 2,400 gpm as required by the Township and the ENPWJSA. It is expected that the projected build out of the GPS drainage basin (including SLPS) will result in a peak flow of 2,537 gpm which is 137 gpm over the aforementioned capacity limitation.

Table 1
Future Development
Germantown Pump Station Service Area

10 Year Growth Projection

Name of Area Served	EDUs
Pimlico Farm	46
Village at Caralea	54
Heatherwood	28
Plymouth Ambulance Company	2
Crowley Foods	4
Gorman Welding	3
Altemose Property	9
2100 Campus Lane	18
2012 to 2017 Build out	180
Totals (EDUs)	344

Average Daily Flow (gpd)[1]	79,120
Peak Flow (gpd)[2]	237,360
Peak Flow (gpm)	165

Notes
1. Based on 230 gpd/EDU
2. Based on a peaking factor of 3

Table 2
Future Development
Sandra Lane Pump Station Service Area

10 Year Growth Projection

Name of Area Served	EDUs
Tone 2000	8
2012 to 2017 Build out	0
Totals (EDUs)	8

Average Daily Flow (gpd)[1]	1,840
Peak Flow (gpd)[2]	5,520
Peak Flow (gpm)	4

Notes
1. Based on 230 gpd/EDU
2. Based on a peaking factor of 3

Table 3
Current and Future Flows
at Germantown Pump Station Including SLPS

Area	Average (gpd)	Peak (gpd)	Peak (gpm)
Germantown Pump Station (Current)	1,152,000	3,456,000	2,400
10 year growth (Total Build-out)[1]	80,960	242,880	169

Total Need[2]	3,653,702	2,537
Available Capacity	3,456,000	2,400
Capacity Deficit	197,702	137

Notes
1. Does not include the Einstein Hospital Site flows.
2. Less 24 EDU (6,240 gpd, 32 gpm using 260 gpd and peaking factor of 7.24) associated with Marion Avenue Diversion.

Sandra Lane Pump Station (SLPS) is directly tributary to GPS and diversion of SLPS will have immediate beneficial impacts on GPS. As shown on Table 4, SLPS currently services 210 EDUs. In the future, flow to this pump station will include the addition of 8 EDUs of future growth and deduction of 24 EDUs relative to the Marion Avenue Diversion for a total of 194 EDU's. The average daily flow pumped by the SLPS is 55,000 gpd while the measured peak flow pumped by the SLPS at this time is 276 gpm. Future peak flow to SLPS, when deducting the Marion Avenue Diversion, is expected to be 247 gpm with an average flow of 50,200 gpd.

Table 4
Sandra Lane Pump Station Pump Station Flows

	Flow		
	EDUs	Average gpd	Peak gpm
Current[1]	210	55,000	276
Future[2]	194	50,200	247

Notes:
1. Actual Peaking Factor of 7.24 and actual unit flow of 260 gpd/EDU.
2. Actual Peaking Factor of 7.24 and 260 gpd/EDU for existing flow & a peaking Factor of 3 and 230 gpd/EDU for future flow.

The projected average flow for the Einstein Hospital Site is 92,000 gpd. As shown in Table 5, the projected peak instantaneous flow is 276,000 gpd or 192 gpm.

Table 5
Einstein Hospital Site Flows

	Flow		
	EDUs	Average gpd	Peak gpm
Current	0	0	0
Future	400	92,000[1]	192[2]

Notes:
1. Based on 230 gpd/EDU
2. Based on peaking factor of 3

The surge storage tank will be sized to store peak flow over the 2,400 gpm limit from GPS and the Einstein Pump Station in order to control peak flows in the downstream sewerage system. Future peak flow, including the current GPS flow (2400 gpm), and ultimate build out (169 gpm) less the Marion Avenue Diversion (32 gpm), is 2,537 gpm. The storage facility size is based upon the projected GPS flow rate in excess of allowable downstream capacity (2,537 gpm – 2,400 gpm = 137 gpm) over a 16 hour period which is based upon the typical GPS overflow period of 13 hours along with a safety factor given the limited conveyance reserve before and after an overflow event. This results in a volume of 131,520 gallons to which is added one day of average flow from the Einstein Hospital site (92,000 gpd); therefore, the total volume of storage that will be required is 223,520 gallons which is rounded up to 225,000 gallons.

4.0 IDENTIFICATION AND EVALUATION OF ALTERNATIVES FOR WASTEWATER MANAGEMENT

Five wastewater management alternatives were considered for this project. As discussed at the September 2, 2008 meeting with PADEP, the alternatives do not include local treatment or expansion of GPS. Expanding GPS is not included because it would require expansion of downstream pump stations and gravity sewers at extraordinary expense. All alternatives include construction of a pump station at Einstein Hospital and the diversion of 24 EDUs (32 gpm peak) from Marion Avenue to the Timberlake Pump Station. In addition, an easement shall be included in the design to provide access for a future gravity connection from the private pump station utilized by businesses on the northeast corner of the Germantown Pike and Whitehall Road Intersection to the proposed Einstein Hospital Pump Station. Storage is also required for implementation of all of the alternatives due to the lack of capacity in the system downstream of GPS that limits flows to the current GPS capacity.

At this time GPS only experiences flows at capacity during extreme wet weather events. According to Township and Joint Sewer Authority requirements, the system downstream of GPS cannot accept peak flows that surpass the current peak flows. Therefore, storage shall be used only to maintain peak flows downstream of the pump stations to their current levels during extreme wet weather events. During normal operation it is expected that the system has adequate capacity to handle peak flows and the proposed storage will not be used.

Alternative No. 1 proposes 225,000 gallons of storage at the GPS site and construction of a private pump station at the Einstein Hospital site for flows created at the site and the adjacent private pump station only. The pump station would be sized to handle 192 gpm from the hospital and 6 gpm from the adjacent lot. This alternative does not include any other diversion from Germantown Pump Station. This alternative is not practical because there is not adequate space for the storage of 225,000 gallons at the Germantown Pump Station Site and according to Table 3, GPS would still require an expansion to have available capacity for the ten year growth projection. In addition, GPS is adjacent to a residential area and the construction of a major storage facility at the site could have negative impacts for the existing homeowners.

Alternative No. 2 proposes storage both at the GPS site and Einstein Hospital site along with construction of a private pump station at the Einstein Hospital site for flows originating from the hospital site and the adjacent private pump station only (198 gpm). It has not been determined how the storage would be separated between the sites. Again, this alternative does not include any other diversion from GPS. This alternative is not practical because according to Table 3, GPS would still require an expansion to have available capacity for the 10 year growth projection. In addition having storage at two locations would add logistical complexity and O&M costs that would not be faced if storage is in one location.

Alternative No. 3 proposes 225,000 gallons of storage at the Einstein Hospital site and pumping GPS flow to a Township owned Einstein Pump Station. The proposed pump station would repump the GPS flows and also pump flows from the Einstein Hospital site and the adjacent private pump station. The pump station at Einstein Hospital would be sized to handle 2400 gpm which is the current peak flow from GPS. This alternative is not desirable because it introduces a prohibitively expensive new large Township owned

pump station requiring high capital and O&M costs. In addition, repumping GPS flows at a new pump station is not an efficient use of Township resources.

Alternative No. 4 includes the gravity diversion of flow from Whitehall Road (55 EDUs) and gravity flows from Germantown Pike (17 EDUs) to a proposed 280 gpm Township owned pump station at the Einstein Hospital site. Storage would also be at the Einstein Hospital Site. The total 10 year projected diversion from GPS is 72 EDUs or 87 gpm, based on 260 gpd/EDU and a peaking factor of 7.24 for existing EDUs and 230 gpd/EDU with a peaking factor of 3 for future EDUs, which is less than the 137 gpm total build out deficit as recorded on Table 3. Therefore this alternative will require upgrading and storage at GPS and is not desirable.

Alternative No. 5 includes the diversion of all flow pumped from Sandra Lane Pump Station (247 gpm) and flow from the Einstein Site (192 gpm) to a proposed Township owned 440 gpm pump station and 225,000 gallon storage at the Einstein Hospital site. This alternative would provide a diversion of flow from GPS well in excess of the 137 gpm overload predicted for GPS. The storage facility would continue to be sized based on the predicted GPS overload. The Einstein Hospital site has ample space for an underground storage facility and diverting the SLPS provides GPS adequate capacity for the 10 year growth projection and beyond. In addition the flows from the proposed pump station would be controlled by variable speed pumps to maintain a maximum flow to Timberlake Pump station of 2,400 gpm. Finally, the Einstein Hospital Pump Station would not need to be dramatically larger than if it only handled the on-site flows. The opinion of probable cost for this alternative, as documented in Figure 2, is approximately $2,100,000. Alternative No. 5 is the selected alternative with an arrangement as presented in Figure 2.

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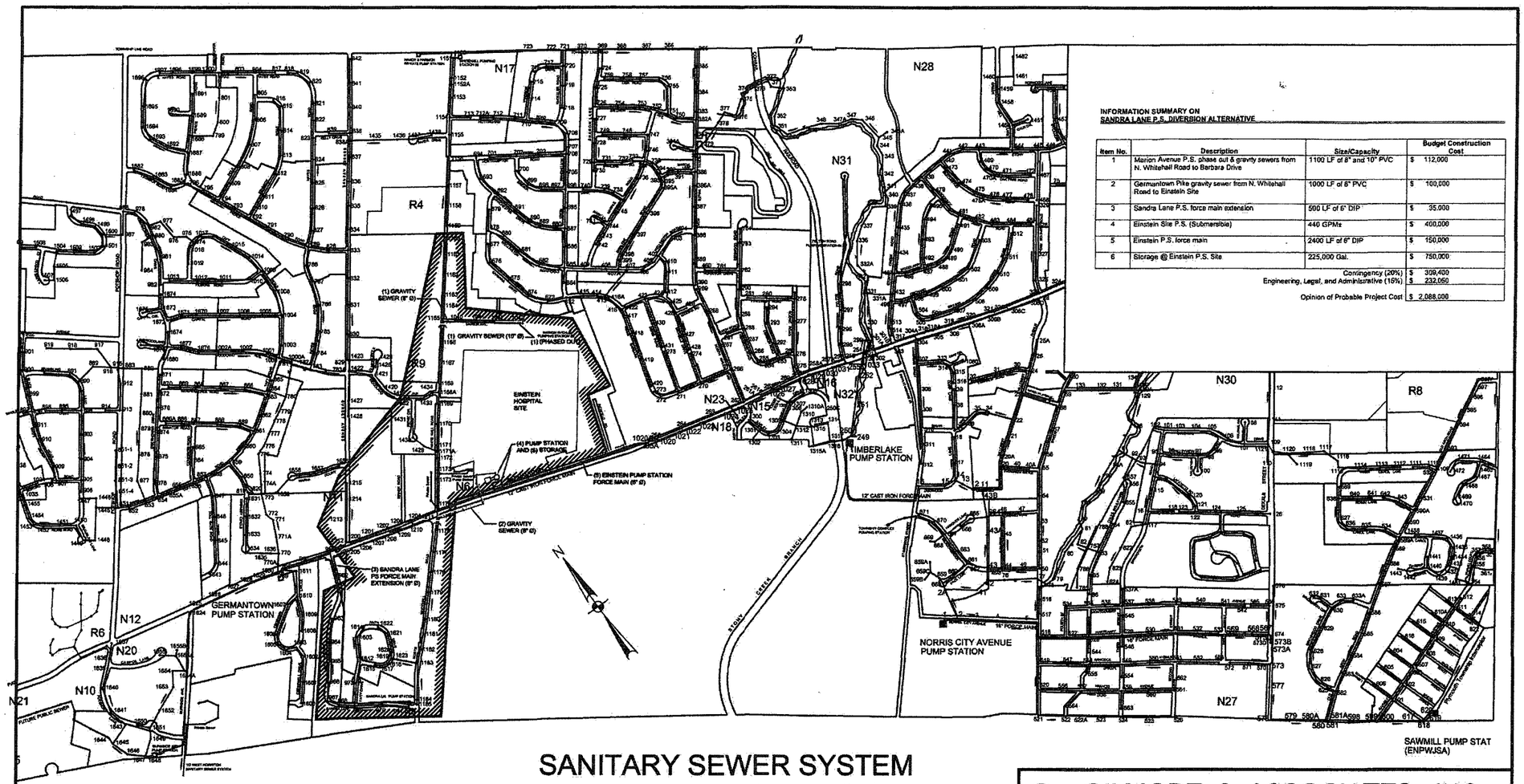

INFORMATION SUMMARY ON
SANDRA LANE P.S. DIVERSION ALTERNATIVE

Item No.	Description	Size/Capacity	Budget Construction Cost
1	Marion Avenue P.S. phase out & gravity sewers from N. Whitehall Road to Barbara Drive	1100 LF of 8" and 10" PVC	$ 112,000
2	Germantown Pike gravity sewer from N. Whitehall Road to Einstein Site	1000 LF of 8" PVC	$ 100,000
3	Sandra Lane P.S. force main extension	500 LF of 6" DIP	$ 35,000
4	Einstein Site P.S. (Submersible)	440 GPMz	$ 400,000
5	Einstein P.S. force main	2400 LF of 6" DIP	$ 150,000
6	Storage @ Einstein P.S. Site	225,000 Gal.	$ 750,000
		Contingency (20%)	$ 309,400
		Engineering, Legal, and Administrative (15%)	$ 232,050
		Opinion of Probable Project Cost	$ 2,088,000

LEGEND

- PUBLIC SANITARY SEWER
- PUBLIC SANITARY PUMP STATION
- FUTURE PUBLIC SANITARY SEWER
- PRIVATE SANITARY SEWER
- PROPOSED GRAVITY SEWER
- PROPOSED FORCE MAIN
- PROPOSED STORAGE OR PUMP STATION
- PROPOSED BREAK IN LINE WITH NEW MANHOLE

SANITARY SEWER SYSTEM
EAST NORRITON TOWNSHIP
MONTGOMERY COUNTY, PENNSYLVANIA
FIGURE 2: CHOSEN ALTERNATIVE MAP

GILMORE & ASSOCIATES, INC.
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65 EAST BUTLER AVENUE, SUITE 100, NEW BRITAIN, PA 18901-5106 • (215) 345-4330
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XX 0 XX XX SCALE IN FEET			JOB NO.: 2008-04020-01
			DATE: 11/18/08
DESIGNED BY: JAK	DRAWN BY: JAK	CHECKED BY: SRL	SCALE: N.T.S.

5.0 IMPLEMENTATION

5.1 Introduction

The wastewater management alternative which best meets the needs of the study area is the diversion of flows from SLPS and Whitehall Road north of Germantown Pike to Einstein Pump Station, which will be privately built but owned and operated by ENT, and construction of a surge storage tank to mitigate the impact of wet weather peak flows. This alternative provides a cost effective approach to connecting the Einstein Hospital site and introduces operational flexibility to the system. The other alternatives are more expensive or do not provide adequate capacity for the ten year growth projections without expanding GPS or downstream facilities.

5.2 Existing and Future Wastewater Disposal Needs

The current wastewater disposal system has adequate capacity for the study area's current needs. Table 3 shows the future need for additional capacity in the study area.

5.3 Operation and Maintenance Considerations

Current Township operations staff would be responsible for operation and maintenance of the proposed Township owned Einstein Pump Station and surge storage tank.

5.4 Cost Effectiveness

The proposed alternative is the most cost effective alternative that allows ENT to manage the proposed development sewage demands while addressing future needs and minimizing any increases in operational complexity. The opinion of probable project cost for the new pump station, storage facility, and SLPS diversion is $2,100,000.

5.5 Available Management and Administrative Systems

East Norriton Township operates and maintains its current sewage conveyance system. Operation and maintenance of the proposed facilities will be the responsibility of the current staff. The existing ENPWJSA owned Saw Mill Pump Station and WWTP would not need to be expanded and current ENPWJSA staff will continue to operate and maintain these facilities.

5.6 Available Financing Methods

The proposed pump station and surge storage tank are to be built in conjunction with construction of the hospital and medical office building. The Einstein Healthcare Network would pay the bulk of the cost and the Township would pay for its incremental share of the pump station and on-site storage. Funds for the Township portion would come from credits to the developer toward the tapping

fee to be paid for this project. Upon completion, the pump station and storage facility would be dedicated to the Township.

5.7 Environmental Soundness

The proposed alternative involves sewage facilities construction in conjunction with development of a large site. The construction of facilities on this site is not expected to adversely impact the existing environmental conditions. Furthermore, the proposed alternative offers an environmental benefit in lessening the likelihood of future sewer system overloads.

5.8 Capital Financing Plan and Back-up Financial Plan

Should the Einstein Hospital site not be developed, alternative methods for conveying any increased sewage shall be reviewed on a case by case basis. Any proposed facilities would be built, permitted, and paid for as required by future development.

5.9 Implementation Schedule

The proposed alternative shall be implemented as a part of the Einstein Hospital site construction. In order to prevent public health hazards, connection of the Einstein Hospital and office building will not be allowed until the pump station and surge storage tank are constructed and operational.

It is projected that the implementation of the treatment facilities and pump station described in this Special Study will meet the following schedule:

Activity	Projected Dates
Issue Special Study for Agency/Public Review	January, 2009
Township Special Study Adoption	April, 2009
PADEP Special Study Approval	July, 2009
Submit Part 2 Water Quality Management Application	August, 2009
PADEP Part 2 Approval	November, 2009
Start Construction	Dependent on
Complete Construction/Start Up	Einstein Hospital Site Development

The schedule will change as necessary to reflect the actual pace of development.

APPENDIX 1:

EAST NORRITON TOWNSHIP PLANNING COMMISSION MEETING MINUTES

EAST NORRITON TOWNSHIP
PLANNING COMMISSION MEETING
WEDNESDAY, FEBRUARY 18, 2009

A meeting of the East Norriton Township Planning Commission was held at the East Norriton Township Building, 2501 Stanbridge Street in East Norriton, Pennsylvania on Wednesday, February 18, 2009. Chairman, Keith Tornetta, called the meeting to order at 7:03p.m. Attending were Township Planning Commission members Keith Tornetta, Joseph Gavanus, William Griffin, Colleen Henderson, Joan Morello, Robert Schottmiller Kristl Wiernicki and Kevin McDevitt. Zoning Officer, Bryan Bortnichak was also in attendance.

1. **Approve Minutes of the January 21, 2009 Planning Commission Meeting:**

Chairman Tornetta called for a motion to approve the January 21, 2009, meeting minutes. Mrs. Henderson made a motion to approve the minutes. Mr. Griffin seconded the motion and the motion passed 8-0.

2. **Review of Act 537 Special Study:**

Present: Stu Rosenthal, Township Sewer Engineer

Mr. Rosenthal identified himself and reviewed the Act 537 Special Study noting that it will enable the Township to handle flows from the proposed Einstein facility while better managing the current inflow and infiltration problem that exists.

Einstein will construct a pump station and surge tank on their property which will be dedicated to the Township upon completion. The pump station will pump to a gravity line that flows to the Timberlake pump station. Additional work associated with the Special Study includes the rerouting of Sandra Lane pump station flows to the Einstein pump station and the elimination of the Marion Avenue pump station to allow gravity to convey this drainage area to flow to Timberlake. This work will remove approximately 224 connections from the Germantown pump station. The surge tank will create capacity within the collection system by providing storage for up to 250,000 gallons during significant rain events.

Mr. Rosenthal noted that the Township has the responsibility for sewer planning and must submit the Special Study to DEP for final approval. The next step is to have the Supervisors adopt the Special Study.

Chairman Tornetta noted that the Township must plan for future growth in the western end of the Township and specifically questioned if the future development of the Valley Forge Heart Hospital property had been considered in

the Study's future growth projections. Mr. Rosenthal noted that he would double check the calculations to ensure that this property is included.

Mr. Griffin inquired about the size of the pump station and surge tank and asked how much larger the facility would need to be in order to accommodate the Township's flows. Mr. Rosenthal noted that Einstein will contribute approximately 92,000 gallons of flow per day and that the Township will contribute approximately 50,000 gallons per day. He added that the cost for the majority of the construction of the pump station and surge tank will be borne by Einstein, though a cost sharing measure is yet to be finalized.

In response to a question from Chairman Tornetta about future growth on the Einstein site, Mr. Rosenthal noted that Einstein will purchase 400 EDU's of capacity and that this capacity will meet Einstein's needs well into the foreseeable future. Mr. Rosenthal noted that future upgrades would take the form of larger pumps and equipment upgrades as opposed to expansion or reconstruction of the wet well and surge tank facilities.

Chairman Tornetta asked if the Tank is above ground. Mr. Rosenthal noted that most of it will be below ground with approximately four feet above ground, but the grade will be brought up to cover the tank. One of his recommendations will be that the tank be enlarged to reduce the depth thus reducing construction and operational costs over the long term.

Mr. Gavanus questioned the need for a surge tank. Mr. Rosenthal noted that if the Einstein development were to remain as open space the Township would still require a tank at the Germantown pump station and that the Township has investigated the concept of placing a tank at this pump station to eliminate overflows.

Mrs. Wiernicki asked if the tank would obstruct sight distances for the proposed western access driveway. Mr. Rosenthal noted that the traffic engineer would have to investigate this issue.

Chairman Tornetta recognized the opportunity to work with a developer to help resolve the Township's inflow and infiltration problem, but asked if this proposal would be more costly than the construction of a surge tank at the Germantown pump station property. Mr. Rosenthal noted that this is a good opportunity to take advantage of and that the Township would bare the full cost of design and construction if a tank were installed at the Germantown pump station.

In response to a question from Mrs. Henderson about placing the tank deeper into the ground, Mr. Rosenthal noted that a deeper tank would cost more to construct and that the additional horsepower needed to pump flows from a lower elevation would result in increased long term operational costs, primarily for electricity.
Mr. Schottmiller asked if the gravity line on Barbara Drive is sufficient to handle the additional load that would come from diverting the Marion Avenue line.

Mr. McDevitt inquired about the recent break in the Germantown force main. Mr. Rosenthal responded that his firm is currently weighing options to rehabilitate the force main.

Nick Viglianese asked if the Township's sharing of construction costs would result in a tax increase and specifically if the cost of the tank at the Germantown pump station would exceed the cost of improvements that we will share with Einstein. Mr. Rosenthal noted that the exact cost of either project have not yet been determined and reiterated that this is a good opportunity for the Township to take advantage of. Mr. Viglianese also noted that the plans should be finalized before the Planning Commission reviews them. In response, Chairman Tornetta noted that not every detail can be worked out at the time when the Planning Commission reviews plans.

Mr. Schottmiller asked how many townhouses and houses could fit on the Woods property. Mr. Bortnichak noted that he does not recall the exact number but that he had calculated the number of dwelling units that could be accommodated based on different zoning districts and estimated that about 600 townhouses could be constructed on the site.

Mrs. Morello noted that taxes not only affect members of the audience, but that they affect the Planning Commission members as they are all residents.

There being no further questions, Mr. Tornetta made a motion to recommend adoption of the Act 537 Special Study with conditions that the cost sharing be defined, and that the future growth in the Western end of the Township be confirmed so that the proposed facilities may be appropriately sized. Mr. Griffin seconded the motion. The motion passed 8-0.

3. **Review of ZHB Case #2009-2, 2301 DeKalb Pike, David Erb:**

Present: David Erb, Applicant

Mr. Erb identified himself as the owner of the property and advised that he is seeking a use variance to permit a hair salon in the property. He added that he had previously obtained a variance to permit an office, but with the current economic conditions, he has consolidated his office staff and that the property is currently vacant. The hair salon would be operated by his daughter.

Mr. Bortnichak advised that there are a number of commercial-style uses along DeKalb Pike where many properties are zoned Residential Office. This property is zoned B-Residential and therefore Mr. Erb requires a variance to allow the proposed use. A discussion ensued regarding the various businesses along DeKalb Pike in the vicinity of the subject property.

Chairman Tornetta encouraged Mr. Erb to seek letters from his neighbors before proceeding to the Zoning Hearing Board.

There being no further questions, Chairman Tornetta made a motion to recommend approval of the variance. The motion was seconded by Mrs. Henderson. The motion passed 8-0.

4. **Adjournment:**

Mrs. Wiernicki made a motion to adjourn. The motion was seconded by Mrs. Henderson, and passed 8-0. The meeting adjourned at approximately 9:01p.m.

Respectfully submitted,

Bryan Bortnichak
Zoning Officer

Keith Tornetta
Chairman

APPENDIX 2:

LETTER FROM MONTGOMERY COUNTY HEALTH DEPARTMENT

COUNTY OF MONTGOMERY

Commissioners
James R. Matthews
Chairman
Joseph M. Hoeffel Bruce L. Castor, Jr.

Joseph M. DiMino, DO
Director of Health/ Medical Director

MONTGOMERY COUNTY HEALTH DEPARTMENT
1430 DeKalb Street, PO Box 311
Norristown, PA 19404-0311
Phone: 610-278-5117 Fax: 610-278-5167
TDD: 610-631-1211
www.health.montcopa.org

EAST NORRITON TOWNSHIP

FEB 10 2008

RECEIVED

February 5, 2009

Bryan Bortnichak, Code Enforcement
East Norriton Township
2501 Stanbridge St.
East Norriton, PA 19401-1616

Re: East Norriton Township Act 537 Special Study
Albert Einstein Healthcare Network Project
Gilmore & Associates, Inc.

Dear Mr. Bortnichak:

The Montgomery County Health Department (MCHD) has reviewed the above referenced Act 537 Special Study project located along Germantown Pike east of Whitehall Road in East Norriton Township, Montgomery County, PA.

The proposed project of a 200 bed hospital and 2 story medical office building will generate approximately 92,000 gallons per day (gpd) or 400 equivalent dwelling units (EDUs) of wastewater flows conveyed by East Norriton Township and treated by East Norriton Plymouth Whitpain Joint Sewer Authority (ENPWJSA).

Since a new pump station and a 225,000 gallon surge storage tank to meet peak wastewater flow requirements will be constructed, MCHD has no objections to the proposed project for the Albert Einstein Healthcare Network.

If you have any questions, please contact me at (610) 278-5117 extention 6731.

Sincerely,

Jennifer K. Paul

Jennifer K. Paul
Environmental Health Specialist/SEO
Division of Water Quality Management
jpaul@montcopa.org

xc: Rachel DeMarzio, Water Quality Supervisor

APPENDIX 3:

LETTER FROM COUNTY PLANNING COMMISSION AND
EAST NORRITON TOWNSHIP REPLY

08-04020-01

MONTGOMERY COUNTY PLANNING COMMISSION

box 311 • norristown • pennsylvania • 19404-0311 • 610-278-3722
office location: suite 201 • one montgomery plaza • swede & airy streets • norristown pa
FAX 610-278-3941 • Website www.montcopa.org/plancom

SEWAGE FACILITIES PLANNING MODULE
COMPONENT 4b - COUNTY PLANNING AGENCY REVIEW

3/24/2009

MCPC 537 Number: 09-1980
Albert Einstein Healthcare Network
Project Special Study
East Norriton Township
Date revision received by the
County Planning Commission:
2/3/2009

Bryan Bortnichak, Director of Code Enforcement
East Norriton Township
2501 Stanbridge Street
East Norriton, PA 19401-1616

Dear Mr. Bortnichak:

We have reviewed this application for a revision to the Township's Sewage Facilities Plan in accordance with regulations issued under Act 537, "The Pennsylvania Sewage Facilities Act," as requested. We are forwarding this letter as a report of our review and recommendations.

BACKGROUND

This special study concerns a proposed change to the Act 537 Sewage Facilities Management Plan which was adopted by East Norriton in April of 2006. The study examines the impacts of the Albert Einstein Healthcare Network's proposed 200 bed hospital and two-story medical office building on Germantown Pike just east of Whitehall Road. The study addresses accommodation of the new development, as well as capacity limitations in adjacent sections of the sewer system. The chosen study alternative calls for the diversion of flows from the Sandra Lane Pump Station to the Einstein Hospital site along with the construction of a 440 gallons per minute pump station and a 225,000 gallon underground equalization tank at the Einstein Hospital site.

COMMENTS

Underground Equalization Tank Maintenance - The applicant should develop an operation, inspection, and maintenance program for the underground equalization tank that guarantees that the system will continue to function properly. The applicant should consult the DEP's Flow Equalization Tanks in Collection and Conveyance Systems Guidelines document for more information on this subject.

RECOMMENDATION

Once these issues have been addressed to the satisfaction of the Township and DEP, we have no objection to this 537 Planning Module. Should there be any questions regarding the content of this letter, please contact me at (610) 278-3750.

Sincerely,

Jon A. Lesher
Environmental Planner
(610) 278-3750
jlesher@montcopa.org

c: Clinton Cleaver, DEP, SERO
Stuart Rosenthal, Gilmore & Associates, Inc.

EAST NORRITON TOWNSHIP

2501 Stanbridge Street, East Norriton, PA 19401-1616 U.S.A.
610-275-2800 • Fax: 610-277-1879
info@eastnorritontwp.org • www.eastnorritontwp.org

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Donald J. Gracia
Vice Chairman

Kandy Heckman
Supervisor

James J. Serratore III
Supervisor

James K. Staufenberg
Supervisor

Township Manager
Helmuth J.H. Baerwald

March 26, 2009

Jon A. Lesher
Environmental Planning
Montgomery County Planning Commission
Box 311
Norristown, PA 19404-0311

Reference: Special Study
MCPC 537 Number: 09-1980
East Norriton Township, Montgomery County

Dear Mr. Lesher:

We received your comments dated March 24, 2008, regarding the above referenced project as documented in Planning Module Component 4C – County Planning Agency Review.

East Norriton Township plans to develop an operation, inspection, and maintenance program for the surge storage tank in accordance with the Pennsylvania Department of Environmental Protection requirements prior to construction of the proposed improvements.

Should you have any questions or require any additional information regarding this matter, please do not hesitate to contact our office.

Sincerely,

Helmuth J.H. Baerwald
East Norriton Township

cc: Clinton Cleaver, Sewage Planning Supervisor – PA DEP
Donald D. Delamater, Assistant Township Manager – East Norriton Township
Douglas R. Jones, Staff Engineer – East Norriton Township
Stuart L. Rosenthal, P.E., Vice President – Gilmore & Associates, Inc.

RECEIVED
APR - 6 2009
GILMORE & ASSOCIATES, INC.

APPENDIX 4:

PROOF OF PUBLIC NOTICE

NORRISTOWN DAILY HERALD
FOUNDED 1799

"An American Newspaper Since 1799"

NORRISTOWN TIMES
FOUNDED 1881

EAST NORRITON TOWNSHIP
FEB 18 2008
RECEIVED

The Times Herald

No.....Term.20.....

PROOF OF PUBLICATION NOTICE IN THE TIMES HERALD
Under Act No. 587, Approved May 16, 1929, P.L. 1784
As Amended by Act. No. 520 of July 5, 1947

STATE OF PENNSYLVANIA)
SS.
COUNTY OF MONTGOMERY)

Shelley Meenan, Publisher of THE TIMES HERALD, of the County and State aforesaid, being duly sworn, deposes and says THE TIMES HERALD, a newspaper of general circulation, published at Markley, Ann, and Airy Streets, Borough of Norristown, county and state aforesaid, was established January 1, 1923, since which date THE TIMES HERALD has been regularly issued in said county, and that the printed notice of publication attached hereto, is exactly the same as was printed and published in the regular edition and issues of THE TIMES HERALD on the following dates:
Viz.....

.....and the
9th day of February A.D. 2009

COPY OF NOTICE

LEGAL NOTICE

Notice is hereby given that the East Norriton Township Board of Supervisors is considering for adoption the East Norriton Township Act 537 Special Study.

The Act 537 Special Study Area includes approximately 0.36 square miles of developed land in the eastern portion of the Township, including all of the Sandra Lane Pump Station service area, consisting of parts of Whitehall Road, Germantown Pike, Sandra Lane, and some tributary streets. The Special Study also establishes the requirements for extending sewer service to the proposed Einstein Hospital on Germantown Pike.

The Act 537 Sewage Facilities Plan Update for this area was originally adopted by the East Norriton Township Board of Supervisors in April 2006. The Special Study proposes the diversion of some sanitary sewage flow from Germantown Pump Station by rerouting sewers from Whitehall Road, a portion of Germantown Pike, and Sandra Lane Pump Station to a proposed pump station to be located on Germantown Pike at the Einstein Hospital Site. This pump station would pump to an existing manhole on Germantown Pike which is tributary to Rittenhouse Pump Station. In addition, the proposed pump station and Germantown Pump Station would be modified to offset or decrease the current peak flows at the alternative Pump Stations. A flume storage tank will be located adjacent to the proposed pump station to provide short term storage of storm induced peak sewage flows.

It is expected that this project will not impact sewer user fees in the Township.

A public review and comment period will extend for thirty (30) days from the date of publication of this notice. The East Norriton Township Act 537 Special Study, which describes the proposed sanitary sewer modifications, can be viewed during this period at the East Norriton Township Administration Building at 2501 Stanbridge Street, Norristown, Pennsylvania during regular business hours. Written comments may be directed to: Bryan J. Bohnstedt, East Norriton Township, 2501 Stanbridge Street, East Norriton, PA 19401-1515.

Lewis K. McQuinn
Chairman
Board of Supervisors

Affiant further deposes that she is an officer duly authorized by THE TIMES HERALD PUBLISHING COMPANY, INC. a corporation, Publisher of THE TIMES HERALD, a newspaper of general circulation to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice of advertisement, and that all allegations in the foregoing statements as to time, place and character of publication are true.

Shelley J. Meenan
PUBLISHER The Times Herald

Sworn and subscribed before me this
13th day of February 2009

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
SHANNON M. STOTT, Notary Public
Norristown Boro, Montgomery County
My Commission Expires Aug. 24, 2011

APPENDIX 5:

CITIZEN'S COMMENT LETTER AND EAST NORRITON TOWNSHIP REPLY

EAST NORRITON RESIDENTS ORGANIZATION

34 EAST GERMANTOWN PIKE, #281
EAST NORRITON, PA 19401

WEBSITE: HTTP://WWW.EASTNORRITONRESIDENTS.ORG E-MAIL: EASTNORRITONRESIDENTS@YAHOO.COM

March 9, 2009

Copy - Helmuth

EAST NORRITON TOWNSHIP
MAR 10 2009
RECEIVED

Mr. Bryan Bortnichak
Director of Planning & Code Enforcement
East Norriton Township
2501 Standbridge Street
East Norriton PA 19401-1616

Dear Bryan:

There are a few questions that we would like answered in regards to Act 537 the proposed sewer and pumping station study.

East Norriton's Sewer Consulting Engineer, Gilmore & Associates, suggests that alternative No. 5 would be the best option for the township to initiate. This alternative was selected since Einstein has offered to build a pumping station and underground storage tank on their anticipated property. This proposed station would handle Einstein's on-site sewage flow as well as the current flow from the Sandra Lane pumping station.

1. What will be the plan if Einstein does not develop or delays development of the proposed hospital? With today's economy we all know that many construction projects are being postponed or dropped completely.

2. Before the township approves this alternative the total cost should be known. This pumping station will be owned by the Township. What is the cost of this sewer improvement plan? How much will Einstein cover and how much will the township need to fund? Where does this type of expense come out of the East Norriton annual budget? Will the residents incur a tax increase to cover this spending?

3. East Norriton continues to grow. One just has to look at the Land Development and Construction Update each month. Einstein has a 10 year expansion plan too. Will the improvements really be able to handle this growth? What is the basis used to calculate both Einstein's growth and the growth in the township? In other words, were did the calculations come from?

We know that the Germantown Pike pumping station and others are in desperate need of repair and improvement. East Norriton must make improvements soon with or without help from Einstein. Please let us know the township has other options for resolving these sewer problems.

Sincerely,

Deborah Knawby

Deborah Knawby
ENRO Board Member

EAST NORRITON TOWNSHIP

2501 Stanbridge Street, East Norriton, PA 19401-1616 U.S.A.
610-275-2800 • Fax: 610-277-1879
info@eastnorritontwp.org • www.eastnorritontwp.org

BOARD OF SUPERVISORS
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James J. Serratore III
Supervisor
James K. Staufenberg
Supervisor

Township Manager
Helmuth J.H. Baerwald

March 11, 2009

Deborah Knawby, Board Member
East Norriton Residents Organization
34 East Germantown Pike, #281
East Norriton, PA 19401

Reference: Act 537 Special Study

Dear Ms. Knawby:

East Norriton Township acknowledges receipt of your comment letter dated March 9, 2009. Responses to your questions are as follows:

1. In the unlikely event that the Einstein Hospital project is not built, sewage surge storage will still be required, but on a smaller scale. A smaller surge storage tank would most likely be located at the Germantown Pump Station site. A feasibility study for a storage tank system at Germantown Pump Station has already been completed, as a contingency for just the scenario you have described in your letter. In either case, the Township will continue its aggressive inflow and infiltration abatement program, which will continue to reduce and possibly eliminate the future need for sewage storage.

2. The Township is proceeding with the Special Study as required by the Pennsylvania Department of Environmental Protection. According to the Special Study, the opinion of probable cost for the chosen alternative is approximately $2,100,000. An independent estimate put forward by Einstein's construction management company agrees with this figure. Negotiations regarding the Township's financial responsibility are ongoing. These funds are derived from sewer tapping fees which accrue from every development in the township. No tax revenues are used for sewer infrastructure needs.

3. Growth in the western end of the Township was calculated from identified planned developments over the next five years plus an estimate of additional development in the remaining undeveloped tracts. The build out estimate was based on minimum lot sizes required by zoning, minus a percent of the tract devoted to streets and storm water management. This calculation would approximate potential ultimate development of this section of the Township. Capacity sizing of the pump station and surge storage tank for the Einstein project should exceed the initial needs associated with the hospital and medical office building. Any future expansions at the site will require the developer to pay for any required improvements, including Township owned sewer system components.

Should you have any questions or require additional information regarding this matter, please do not hesitate to call our office.

Sincerely,

Helmuth J. H. Baerwald
Township Manager

/hjhb
Cc: Board of Supervisors
Donald D. Delamater, Assistant Township Manager
Township Consultants

APPENDIX 6:

ADOPTING RESOLUTION BY EAST NORRITON TOWNSHIP BOARD OF SUPERVISIORS

RESOLUTION NO. 2451

RESOLUTION FOR PLAN REVISION

RESOLUTION OF THE SUPERVISORS OF EAST NORRITON TOWNSHIP, MONTGOMERY COUNTY, PENNSYLVANIA

WHEREAS, Section 5 of the Act of January 24, 1966, P.L. 1535, No. 537, known as the "Pennsylvania Sewage Facilities Act", as Amended, and the Rules and Regulations of the Pennsylvania Department of Environmental Protection (Department) adopted thereunder, Chapter 71 of Title 25 of the Pennsylvania Code, requires the municipality to adopt an Official Sewage Facilities Plan providing for sewage services adequate to prevent contamination of waters and/or environmental health hazards with sewage wastes, and to revise said plan whenever it is necessary to meet the sewage disposal needs of the municipality, and

WHEREAS, Gilmore & Associates, Inc. has prepared an **"Act 537 Special Study" dated January 2009, revised and appended April 2009,** which provides for sewage facilities in a portion of East Norriton Township, and

WHEREAS, the alternative of choice to be implemented is the construction of new sewage facilities and rehabilitation/repair of existing sewage facilities. The key implementation activities include the phase out of the Marion Avenue Pump Station with diversion of sewage flows from North Whitehall Road to Barbara Drive, the diversion of sewage flows from the Sandra Lane Pump Station to the proposed Einstein Hospital site along with construction of a pump station and surge storage tank at the proposed Einstein Hospital site.

WHEREAS, East Norriton Township finds that the Special Study described above conforms to applicable zoning, subdivision, other municipal ordinances and plans and to a comprehensive program of pollution control and water quality management.

NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors of East Norriton Township hereby adopt and submit to the Department of Environmental Protection for its approval as a revision to the "Official Plan" of the municipality, the above referenced Special Study. The municipality hereby assures the Department of the complete and timely implementation of the said plan as required by law (Section 5, Pennsylvania Sewage Facilities Act as amended).

DULY PRESENTED AND ADOPTED by the Board of Supervisors of East Norriton Township, Montgomery County, Pennsylvania, in a public meeting held this **28th day of April 2009.**

TOWNSHIP OF EAST NORRITON MONTGOMERY COUNTY PENNSYLVANIA INCORPORATE MARCH 9, 1909

BOARD OF SUPERVISORS
EAST NORRITON TOWNSHIP

By: _____
Chairman

Attest: _____
Secretary

APPENDIX 7:

ACT 537 PLAN CONTENT AND ENVIRONMENTAL ASSESSMENT CHECKLIST

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER STANDARDS AND FACILITY REGULATION

Act 537 Plan Content and Environmental Assessment Checklist

PART 1 GENERAL INFORMATION

A. Project Information

1. Project Name East Norriton Township Act 537 Special Study

2. Brief Project Description Special 537 study to address sewage management needs associated with Einstein Hospital proposal and other projected growth in western end of East Norriton Township.

B. Client (Municipality) Information

Municipality Name	County	City	Boro	Twp
East Norriton Township	Montgomery	☐	☐	☒

Municipality Contact Individual - Last Name	First Name	MI	Suffix	Title
Baerwald	Helmuth	J		Township Manager
Additional Individual Last Name	First Name	MI	Suffix	Title

Municipality Mailing Address Line 1	Mailing Address Line 2
2501 Stanbridge Street	

Address Last Line -- City	State	ZIP+4
East Norriton	PA	19401-1879

Phone + Ext.	FAX (optional)	Email (optional)
(610) 275-2800	(610) 277-1879	hbaerwald@eastnorritontwp.org

C. Site Information

Site (or Project) Name	
Act 537 Special Study	(Municipal Name) Act 537 Plan

Site Location Line 1	Site Location Line 2

D. Project Consultant Information

Last Name	First Name	MI	Suffix
Rosenthal	Stuart	L	P.E.

Title	Consulting Firm Name
Vice President	Gilmore & Associates, Inc.

Mailing Address Line 1	Mailing Address Line 2
65 East Butler Avenue	

Address Last Line -- City	State	ZIP+4	Country
New Britain	PA	18901	

Email	Phone + Ext.	FAX
srosenthal@gilmore-assoc.com	215-345-4330	215-345-8606

PART 2 ADMINISTRATIVE COMPLETENESS CHECKLIST

DEP Use Only	Indicate Page #(s) in Plan	In addition to the main body of the plan, the plan must include items one through eight listed below to be accepted for formal review by the department. Incomplete Plans will be returned unless the municipality is clearly requesting an advisory review.
_____	TOC	1. **Table of Contents**
		2. **Plan Summary**
_____	2-6	A. Identify the proposed service areas and major problems evaluated in the plan. (Reference - Title 25, §71.21.a.7.i).
_____	7-9	B. Identify the alternative(s) chosen to solve the problems and serve the areas of need identified in the plan. Also, include any institutional arrangements necessary to implement the chosen alternative(s). (Reference Title 25 §71.21.a.7.ii).
_____	9-11	C. Present the estimated cost of implementing the proposed alternative (including the user fees) and the proposed funding method to be used. (Reference Title 25, §71.21.a.7.ii).
_____	10-11	D. Identify the municipal commitments necessary to implement the Plan. (Reference Title 25, §71.21.a.7.iii).
_____	11	E. Provide a schedule of implementation for the project that identifies the MAJOR milestones with dates necessary to accomplish the project to the point of operational status. (Reference Title 25, §71.21.a.7.iv).
_____	Appendix 6	3. **Municipal Adoption: Original,** signed and sealed Resolution of Adoption by the municipality which contains, at a minimum, alternatives chosen and a commitment to implement the Plan in accordance with the implementation schedule. (Reference Title 25, §71.31.f) Section V.F. of the Planning Guide.
_____	Appendix 2 & 3	4. **Planning Commission / County Health Department Comments:** Evidence that the municipality has requested, reviewed and considered comments by appropriate official planning agencies of the municipality, planning agencies of the county, planning agencies with area wide jurisdiction (where applicable), and any existing county or joint county departments of health. (Reference Title 25, §71.31.b) Section V.E.1 of the Planning Guide.
_____	Appendix 4	5. **Publication:** Proof of Public Notice which documents the proposed plan adoption, plan summary, and the establishment and conduct of a 30 day comment period. (Reference Title 25, §71.31.c) Section V.E.2 of the Planning Guide.
_____	Appendix 5	6. **Comments and Responses:** Copies of ALL written comments received and municipal response to EACH comment in relation to the proposed plan. (Reference Title 25, §71.31.c) Section V.E.2 of the Planning Guide.
_____	11	7. **Implementation Schedule:** A complete project implementation schedule with milestone dates specific for each existing and future area of need. Other activities in the project implementation schedule should be indicated as occurring a finite number of days from a major milestone. (Reference Title 25, §71.31.d) Section V.F. of the Planning Guide. Include dates for the future initiation of feasibility evaluations in the project's implementation schedule for areas proposing completion of sewage facilities for planning periods in excess of five years. (Reference Title 25, §71.21.c).
_____	Appendix 2 & 3	8. **Consistency Documentation:** Documentation indicating that the appropriate agencies have received, reviewed and concurred with the method proposed to resolve identified inconsistencies within the proposed alternative and consistency requirements in 71.21.(a)(5)(i-iii). (Reference Title 25, §71.31.e). Appendix B of the Planning Guide.

PART 3 GENERAL PLAN CONTENT CHECKLIST

DEP Use Only	Indicate Page #(s) in Plan	Item Required
____	____	**I. Previous Wastewater Planning**
		A. Identify, describe and briefly analyze all past wastewater planning for its impact on the current planning effort:
____	1-3	1. Previously undertaken under the Sewage Facilities Act (Act 537). (Reference-Act 537, Section 5 §d.1).
____	1-3	2. Has not been carried out according to an approved implementation schedule contained in the plans. (Reference-Title 25, §71.21.a.5.i.A-D). Section V.F of the Planning Guide.
____	NA	3. Is anticipated or planned by applicable sewer authorities or approved under a Chapter 94 Corrective Action Plan. (Reference-Title 25, §71.21.a.5.i.A&B). Section V.D. of the Planning Guide.
____	1-3	4. Through planning modules for new land development, planning "exemptions" and addenda. (Reference-Title 25, §71.21.a.5.i.A).
____	____	**II. Physical and Demographic Analysis utilizing written description and mapping** (All items listed below require maps, and all maps should show all current lots and structures and be of appropriate scale to clearly show significant information).
____	2-3	A. Identification of planning area(s), municipal boundaries, Sewer Authority/Management Agency service area boundaries. (Reference-Title 25, §71.21.a.1.i).
____	NA	B. Identification of physical characteristics (streams, lakes, impoundments, natural conveyance, channels, drainage basins in the planning area). (Reference-Title 25, §71.21.a.1.ii).
____	NA	C. Soils - Analysis with description by soil type and soils mapping for areas not presently served by sanitary sewer service. Show areas suitable for in-ground onlot systems, elevated sand mounds, individual residential spray irrigation systems, and areas unsuitable for soil dependent systems. (Reference-Title 25, §71.21.a.1.iii). Show Prime Agricultural Soils and any locally protected agricultural soils. (Reference-Title 25, §71.21.a.1.iii).
____	NA	D. Geologic Features - (1) Identification through analysis, (2) mapping and (3) their relation to existing or potential nitrate-nitrogen pollution and drinking water sources. Include areas where existing nitrate-nitrogen levels are in excess of 5 mg/L. (Reference-Title 25, §71.21.a.1.iii).
____	NA	E. Topography - Depict areas with slopes that are suitable for conventional systems; slopes that are suitable for elevated sand mounds and slopes that are unsuitable for onlot systems. (Reference-Title 25, §71.21.a.1.ii).
____	NA	F. Potable Water Supplies - Identification through mapping, description and analysis. Include public water supply service areas and available public water supply capacity and aquifer yield for groundwater supplies. (Reference-Title 25 §71.21.a.1.vi). Section V.C. of the Planning Guide.

NA G. Wetlands-Identify wetlands as defined in Title 25, Chapter 105 by description, analysis and mapping. Include National Wetland Inventory mapping and potential wetland areas per USDA, SCS mapped hydric soils. Proposed collection, conveyance and treatment facilities and lines must be located and labeled, along with the identified wetlands, on the map. (Reference-Title 25, §71.21.a.1.v). Appendix B, Section II.I of the Planning Guide.

III. **Existing Sewage Facilities in the Planning Area - Identifying the Existing Needs**

A. Identify, map and describe municipal and non-municipal, individual and community sewerage systems in the planning area including:

3-6 1. Location, size and ownership of treatment facilities, main intercepting lines, pumping stations and force mains including their size, capacity, point of discharge. Also include the name of the receiving stream, drainage basin, and the facility's effluent discharge requirements. (Reference-Title 25, §71.21a.2.i.A).

NA 2. A narrative and schematic diagram of the facility's basic treatment processes including the facility's NPDES permitted capacity, and the Clean Streams Law permit number. (Reference-Title 25, §71.21.a.2.i.A).

3-6 3. A description of problems with existing facilities (collection, conveyance and/or treatment), including existing or projected overload under Title 25, Chapter 94 (relating to municipal wasteload management) or violations of the NPDES permit, Clean Streams Law permit, or other permit, rule or regulation of DEP. (Reference-Title 25, §71.21.a.2.i.B).

NA 4. Details of scheduled or in-progress upgrading or expansion of treatment facilities and the anticipated completion date of the improvements. Discuss any remaining reserve capacity and the policy concerning the allocation of reserve capacity. Also discuss the compatibility of the rate of growth to existing and proposed wastewater treatment facilities. (Reference-Title 25, §71.21.a.4.i & ii).

NA 5. A detailed description of the municipality's operation and maintenance requirements for small flow treatment facility systems, including the status of past and present compliance with these requirements and any other requirements relating to sewage management programs. (Reference-Title 25, §71.21.a.2.i.C).

NA 6. Disposal areas, if other than stream discharge, and any applicable groundwater limitations. (Reference-Title 25, §71.21.a.4.i & ii).

NA B. Using DEP's publication titled *Sewage Disposal Needs Identification*, identify, map and describe areas that utilize individual and community onlot sewage disposal and, unpermitted collection and disposal systems ("wildcat" sewers, borehole disposal, etc.) and retaining tank systems in the planning area including:

NA 1. The types of onlot systems in use. (Reference-Title 25, §71.21.a.2.ii.A).

NA 2. A sanitary survey complete with description, map and tabulation of documented and potential public health, pollution, and operational problems (including malfunctioning systems) with the systems, including violations of local ordinances, the Sewage Facilities Act, the Clean Stream Law or regulations promulgated thereunder. (Reference-Title 25, §71.21.a.2.ii.B).

NA 3. A comparison of the types of onlot sewage systems installed in an area with the types of systems which are appropriate for the area according to soil, geologic conditions, topographic limitations sewage flows, and Title 25 Chapter 73 (relating to standards for sewage disposal facilities). (Reference-Title 25, §71.21.a.2.ii.C).

NA 4. An individual water supply survey to identify possible contamination by malfunctioning onlot sewage disposal systems consistent with DEP's *Sewage Disposal Needs Identification* publication. (Reference-Title 25 §71.21.a.2.ii.B).

NA 5. Detailed description of operation and maintenance requirements of the municipality for individual and small volume community onlot systems, including the status of past and present compliance with these requirements and any other requirements relating to sewage management programs. (Reference-Title 25, §71.21.a.2.i.C).

NA C. Identify wastewater sludge and septage generation, transport and disposal methods. Include this information in the sewage facilities alternative analysis including:

NA 1. Location of sources of wastewater sludge or septage (Septic tanks, holding tanks, wastewater treatment facilities). (Reference-Title 25 §71.71).

NA 2. Quantities of the types of sludges or septage generated. (Reference-Title 25 §71.71).

NA 3. Present disposal methods, locations, capacities and transportation methods. (Reference-Title 25 §71.71).

IV. **Future Growth and Land Development**

A. Identify and briefly summarize all municipal and county planning documents adopted pursuant to the Pennsylvania Municipalities Planning Code (Act 247) including:

NA 1. All land use plans and zoning maps that identify residential, commercial, industrial, agricultural, recreational and open space areas. (Reference-Title 25, §71.21.a.3.iv).

NA 2. Zoning or subdivision regulations that establish lot sizes predicated on sewage disposal methods. (Reference – Title 25§71.21.a.3.iv).

NA 3. All limitations and plans related to floodplain and stormwater management and special protection (Ch. 93) areas. (Reference-Title 25 §71.21.a.3.iv) Appendix B, Section II.F of the Planning Guide.

B. Delineate and describe the following through map, text and analysis.

4-6 1. Areas with existing development or plotted subdivisions. Include the name, location, description, total number of EDU's in development, total number of EDU's currently developed and total number of EDU's remaining to be developed (include time schedule for EDU's remaining to be developed). (Reference-Title 25, §71.21.a.3.i).

NA 2. Land use designations established under the Pennsylvania Municipalities Planning Code (35 P.S. 10101-11202), including residential, commercial and industrial areas. (Reference-Title 25,§71.21.a.3.ii). Include a comparison of proposed land use as allowed by zoning and existing sewage facility planning. (Reference-Title 25, §71.21.a.3.iv).

4-6 3. Future growth areas with population and EDU projections for these areas using historical, current and future population figures and projections of the municipality. Discuss and evaluate discrepancies between local, county, state and federal projections as they relate to sewage facilities. (Reference-Title 25, §71.21.a.1.iv). (Reference-Title 25, §71.21.a.3.iii).

NA 4. Zoning, and/or subdivision regulations; local, county or regional comprehensive plans; and existing plans of any other agency relating to the development, use and protection of land and water resources with special attention to: (Reference-Title 25, §71.21.a.3.iv).

--public ground/surface water supplies

--recreational water use areas

--groundwater recharge areas

--industrial water use

--wetlands

4-6 5. Sewage planning necessary to provide adequate wastewater treatment for five and ten year future planning periods based on projected growth of existing and proposed wastewater collection and treatment facilities. (Reference-Title 25, §71.21.a.3.v).

V. Identify Alternatives to Provide New or Improved Wastewater Disposal Facilities

A. Conventional collection, conveyance, treatment and discharge alternatives including:

NA 1. The potential for regional wastewater treatment. (Reference-Title 25, §71.21.a.4).

NA 2. The potential for extension of existing municipal or non-municipal sewage facilities to areas in need of new or improved sewage facilities. (Reference-Title 25, §71.21.a.4.i).

7-9 3. The potential for the continued use of existing municipal or non-municipal sewage facilities through one or more of the following: (Reference-Title 25, §71.21.a.4.ii).

7-9 a. Repair. (Reference-Title 25, §71.21.a.4.ii.A).

7-9 b. Upgrading. (Reference-Title 25, §71.21.a.4.ii.B).

7-9 c. Reduction of hydraulic or organic loading to existing facilities. (Reference-Title 25, §71.71).

NA d. Improved operation and maintenance. Reference-Title 25, §71.21.a.4.ii.C).

7-9 e. Other applicable actions that will resolve or abate the identified problems. (Reference-Title 25, §71.21.a.4.ii.D).

7-9 4. Repair or replacement of existing collection and conveyance system components. (Reference-Title 25, §71.21.a.4.ii.A).

7-9 5. The need for construction of new community sewage systems including sewer systems and/or treatment facilities. (Reference-Title 25, §71.21.a.4.iii).

NA 6. Use of innovative/alternative methods of collection/conveyance to serve needs areas using existing wastewater treatment facilities. (Reference-Title 25, §71.21.a.4.ii.B).

NA B. The use of individual sewage disposal systems including individual residential spray irrigation systems based on:

NA 1. Soil and slope suitability. (Reference-Title 25, §71.21.a.2.ii.C).

NA 2. Preliminary hydrogeologic evaluation. (Reference-Title 25, §71.21.a.2.ii.C).

NA 3. The establishment of a sewage management program. (Reference-Title 25, §71.21.a.4.iv). See also Part "F" below.

NA 4. The repair, replacement or upgrading of existing malfunctioning systems in

areas suitable for onlot disposal considering: (Reference-Title 25, §71.21.a.4).

NA a. Existing technology and sizing requirements of Title 25 Chapter 73. (Reference-Title 25, §73.31-73.72).

NA b. Use of expanded absorption areas or alternating absorption areas. (Reference-Title 25, §73.16).

NA c. Use of water conservation devices. (Reference-Title 25, §71.73.b.2.iii).

NA C. The use of small flow sewage treatment facilities or package treatment facilities to serve individual homes or clusters of homes with consideration of: (Reference-Title 25, §71.64.d).

NA 1. Treatment and discharge requirements. (Reference-Title 25, §71.64.d).

NA 2. Soil suitability. (Reference-Title 25, §71.64.c.l).

NA 3. Preliminary hydrogeologic evaluation. (Reference-Title 25, §71.64.c.2).

NA 4. Municipal, Local, Agency or other controls over operation and maintenance requirements through a Sewage Management Program. (Reference-Title 25, §71.64.d). See Part "F" below.

NA D. The use of community land disposal alternatives including:

NA 1. Soil and site suitability. (Reference-Title 25, §71.21.a.2.ii.C).

NA 2. Preliminary hydrogeologic evaluation. (Reference-Title 25, §71.21.a.2.ii.C).

NA 3. Municipality, Local Agency or Other Controls over operation and maintenance requirements through a Sewage Management Program (Reference-Title25, §71.21.a.2.ii.C). See Part "F" below.

NA 4. The rehabilitation or replacement of existing malfunctioning community land disposal systems. (See Part "V", B, 4, a, b, c above). See also Part "F" below.

7-9 E. The use of retaining tank alternatives on a temporary or permanent basis including: (Reference- Title 25, §71.21.a.4).

7-9 1. Commercial, residential and industrial use. (Reference-Title 25, §71.63.e).

7-9 2 Designated conveyance facilities (pumper trucks). (Reference-Title 25, §71.63.b.2).

NA 3. Designated treatment facilities or disposal site. (Reference-Title 25, §71.63.b.2).

NA 4. Implementation of a retaining tank ordinance by the municipality. (Reference-Title 25, §71.63.c.3). See Part "F" below.

NA 5. Financial guarantees when retaining tanks are used as an interim sewage disposal measure. (Reference-Title 25, §71.63.c.2).

NA F. Sewage Management Programs to assure the future operation and maintenance of existing and proposed sewage facilities through:

NA 1. Municipal ownership or control over the operation and maintenance of individual onlot sewage disposal systems, small flow treatment facilities, or other traditionally non-municipal treatment facilities. (Reference-Title 25, §71.21.a.4.iv).

NA 2. Required inspection of sewage disposal systems on a schedule established by the municipality. (Reference-Title 25, §71.73.b.1.).

NA 3. Required maintenance of sewage disposal systems including septic and aerobic treatment tanks and other system components on a schedule

established by the municipality. (Reference-Title 25, §71.73.b.2).

_____ NA 4. Repair, replacement or upgrading of malfunctioning onlot sewage systems. (Reference-Title 25, §71.21.a.4.iv) and §71.73.b.5 through:

_____ NA a. Aggressive pro-active enforcement of ordinances that require operation and maintenance and prohibit malfunctioning systems. (Reference-Title 25, §71.73.b.5).

_____ NA b. Public education programs to encourage proper operation and maintenance and repair of sewage disposal systems.

_____ NA 5. Establishment of joint municipal sewage management programs. (Reference-Title 25, §71.73.b.8).

_____ NA 6. Requirements for bonding, escrow accounts, management agencies or associations to assure operation and maintenance for non-municipal facilities. (Reference-Title 25, §71.71).

_____ NA G. Non-structural comprehensive planning alternatives that can be undertaken to assist in meeting existing and future sewage disposal needs including: (Reference-Title 25, §71.21.a.4).

1. Modification of existing comprehensive plans involving:

_____ NA a. Land use designations. (Reference-Title 25, §71.21.a.4).

_____ NA b. Densities. (Reference-Title 25, §71.21.a.4).

_____ NA c. Municipal ordinances and regulations. (Reference-Title 25, §71.21.a.4).

_____ NA d. Improved enforcement. (Reference-Title 25, §71.21.a.4).

_____ NA e. Protection of drinking water sources. (Reference-Title 25, §71.21.a.4).

_____ NA 2. Consideration of a local comprehensive plan to assist in producing sound economic and consistent land development. (Reference-Title 25, §71.21.a.4).

_____ NA 3. Alternatives for creating or changing municipal subdivision regulations to assure long-term use of on-site sewage disposal that consider lot sizes and protection of replacement areas. (Reference-Title 25, §71.21.a.4).

_____ NA 4. Evaluation of existing local agency programs and the need for technical or administrative training. (Reference-Title 25, §71.21.a.4).

_____ NA H. A no-action alternative which includes discussion of both short-term and long-term impacts on: (Reference-Title 25, §71.21.a.4).

_____ NA 1. Water Quality/Public Health. (Reference-Title 25, §71.21.a.4).

_____ NA 2. Growth potential (residential, commercial, industrial). (Reference-Title 25, §71.21.a.4).

_____ NA 3. Community economic conditions. (Reference-Title 25, §71.21.a.4).

_____ NA 4. Recreational opportunities. (Reference-Title 25, §71.21.a.4).

_____ NA 5. Drinking water sources. (Reference-Title 25, §71.21.a.4).

_____ NA 6. Other environmental concerns. (Reference-Title 25, §71.21.a.4).

_____ _____ **VI. Evaluation of Alternatives**

A. Technically feasible alternatives identified in Section V of this check-list must be evaluated for consistency with respect to the following: (Reference-Title 25, §71.21.a.5.i.).

_____ NA 1. Applicable plans developed and approved under **Sections 4 and 5 of the Clean Streams Law or Section 208 of the Clean Water Act** (33 U.S.C.A. 1288). (Reference-Title 25, §71.21.a.5.i.A). Appendix B, Section II.A of the

Planning Guide.

_____ NA 2. Municipal wasteload management **Corrective Action Plans or Annual Reports** developed under PA Code, Title 25, Chapter 94. (Reference-Title 25, §71.21.a.5.i.B). The municipality's recent Wasteload Management (Chapter 94) Reports should be examined to determine if the proposed alternative is consistent with the recommendations and findings of the report. Appendix B, Section II.B of the Planning Guide.

_____ NA 3. Plans developed under **Title II of the Clean Water Act** (33 U.S.C.A. 1281-1299) or **Titles II and VI of the Water Quality Act of 1987** (33 U.S.C.A 1251-1376). (Reference-Title 25, §71.21.a.5.i.C). Appendix B, Section II.E of the Planning Guide.

_____ NA 4. **Comprehensive plans** developed under the Pennsylvania Municipalities Planning Code. (Reference-Title 25, §71.21.a.5.i.D). The municipality's comprehensive plan must be examined to assure that the proposed wastewater disposal alternative is consistent with land use and all other requirements stated in the comprehensive plan. Appendix B, Section II.D of the Planning Guide.

_____ NA 5. **Antidegradation requirements** as contained in PA Code, Title 25, Chapters 93, 95 and 102 (relating to water quality standards, wastewater treatment requirements and erosion control) and the Clean Water Act. (Reference-Title 25, §71.21.a.5.i.E). Appendix B, Section II.F of the Planning Guide.

_____ NA 6. **State Water Plans** developed under the Water Resources Planning Act (42 U.S.C.A. 1962-1962 d-18). (Reference-Title 25, §71.21.a.5.i.F). Appendix B, Section II.C of the Planning Guide.

_____ NA 7. **Pennsylvania Prime Agricultural Land Policy** contained in Title 4 of the Pennsylvania Code, Chapter 7, Subchapter W. Provide narrative on local municipal policy and an overlay map on prime agricultural soils. (Reference-Title 25, §71.21.a.5.i.G). Appendix B, Section II.G of the Planning Guide.

_____ NA 8. **County Stormwater Management Plans** approved by DEP under the Storm Water Management Act (32 P.S. 680.1-680.17). (Reference-Title 25, §71.21.a.5.i.H). Conflicts created by the implementation of the proposed wastewater alternative and the existing recommendations for the management of stormwater in the county Stormwater Management Plan must be evaluated and mitigated. If no plan exists, no conflict exists. Appendix B, Section II.H of the Planning Guide.

_____ NA 9. **Wetland Protection.** Using wetland mapping developed under Checklist Section II.G, identify and discuss mitigative measures including the need to obtain permits for any encroachments on wetlands from the construction or operation of any proposed wastewater facilities. (Reference-Title 25, §71.21.a.5.i.I) Appendix B, Section II.I of the Planning Guide.

_____ NA 10. **Protection of rare, endangered or threatened plant and animal species** as identified by the Pennsylvania Natural Diversity Inventory (PNDI). (Reference-Title 25, §71.21.a.5.i.J). Provide DEP with a copy of the completed Request For PNDI Search document. Also provide a copy of the response letter from the Department of Conservation and Natural Resources' Bureau of Forestry regarding the findings of the PNDI search. Appendix B, Section II.J of the Planning Guide.

_____ NA 11. **Historical and archaeological resource protection** under P.C.S. Title 37, Section 507 relating to cooperation by public officials with the Pennsylvania Historical and Museum Commission. (Reference-Title 25, §71.21.a.5.i.K). Provide the department with a completed copy of a Cultural Resource Notice

request of the Bureau of Historic Preservation (BHP) to provide a listing of known historical sites and potential impacts on known archaeological and historical sites. Also provide a copy of the response letter from the BHP. Appendix B, Section II.K of the Planning Guide.

_____ NA B. Provide for the resolution of any inconsistencies in any of the points identified in Section VI.A. of this checklist by submitting a letter from the appropriate agency stating that the agency has received, reviewed and concurred with the resolution of identified inconsistencies. (Reference-Title 25, §71.21.a.5.ii). Appendix B of the Planning Guide.

_____ 7-9 C. Evaluate alternatives identified in Section V of this checklist with respect to applicable water quality standards, effluent limitations or other technical, legislative or legal requirements. (Reference-Title 25, §71.21.a.5.iii).

_____ 7-9 D. Provide cost estimates using present worth analysis for construction, financing, on going administration, operation and maintenance and user fees for alternatives identified in Section V of this checklist. Estimates shall be limited to areas identified in the plan as needing improved sewage facilities within five years from the date of plan submission. (Reference-Title 25, §71.21.a.5.iv).

_____ 10-11 E. Provide an analysis of the funding methods available to finance the proposed alternatives evaluated in Section V of this checklist. Also provide documentation to demonstrate which alternative and financing scheme combination is the most cost-effective; and a contingency financial plan to be used if the preferred method of financing cannot be implemented. The funding analysis shall be limited to areas identified in the plan as needing improved sewage facilities within five years from the date of the plan submission. (Reference-Title 25, §71.21.a.5.v).

_____ NA F. Analyze the need for immediate or phased implementation of each alternative proposed in Section V of this checklist including: (Reference-Title 25, §71.21.a.5.vi).

_____ NA 1. A description of any activities necessary to abate critical public health hazards pending completion of sewage facilities or implementation of sewage management programs. (Reference-Title 25, §71.21.a.5.vi.A).

_____ NA 2. A description of the advantages, if any, in phasing construction of the facilities or implementation of a sewage management program justifying time schedules for each phase. (Reference-Title 25, §71.21.a.5.vi.B).

_____ 10-11 G. Evaluate administrative organizations and legal authority necessary for plan implementation. (Reference - Title 25, §71.21.a.5.vi.D.).

_____ _____ **VII. Institutional Evaluation**

A. Provide an analysis of all existing wastewater treatment authorities, their past actions and present performance including:

_____ NA 1. Financial and debt status. (Reference-Title 25, §71.61.d.2).

_____ 10-11 2. Available staff and administrative resources. (Reference-Title 25, §71.61.d.2)

_____ 10-11 3. Existing legal authority to:

_____ 10-11 a. Implement wastewater planning recommendations. (Reference-Title 25, §71.61.d.2).

_____ 10-11 b. Implement system-wide operation and maintenance activities. (Reference-Title 25, §71.61.d.2).

_____ 10-11 c. Set user fees and take purchasing actions. (Reference-Title 25, §71.61.d.2).

_____ NA d. Take enforcement actions against ordinance violators. (Reference-Title 25,

§71.61.d.2).

_____	NA	e. Negotiate agreements with other parties. (Reference-Title 25, §71.61.d.2).
_____	NA	f. Raise capital for construction and operation and maintenance of facilities. (Reference-Title 25,§71.61.d.2).
_____	NA	B. Provide an analysis and description of the various institutional alternatives necessary to implement the proposed technical alternatives including:
_____	NA	1. Need for new municipal departments or municipal authorities. (Reference-Title 25, §71.61.d.2).
_____	NA	2. Functions of existing and proposed organizations (sewer authorities, onlot maintenance agencies, etc.). (Reference-Title 25, §71.61.d.2).
_____	NA	3. Cost of administration, implementability, and the capability of the authority/agency to react to future needs. (Reference-Title 25, §71.61.d.2).
_____	NA	C. Describe all necessary administrative and legal activities to be completed and adopted to ensure the implementation of the recommended alternative including:
_____	NA	1. Incorporation of authorities or agencies. (Reference-Title 25, §71.61.d.2).
_____	NA	2. Development of all required ordinances, regulations, standards and inter-municipal agreements. (Reference-Title 25, §71.61.d.2).
_____	NA	3. Description of activities to provide rights-of-way, easements and land transfers. (Reference-Title 25, §71.61.d.2).
_____	NA	4. Adoption of other municipal sewage facilities plans. (Reference-Title 25, §71.61.d.2).
_____	NA	5. Any other legal documents. (Reference-Title 25, §71.61.d.2).
_____	NA	6. Dates or timeframes for items 1-5 above on the project's implementation schedule.
_____	10-11	D. Identify the proposed institutional alternative for implementing the chosen technical wastewater disposal alternative. Provide justification for choosing the specific institutional alternative considering administrative issues, organizational needs and enabling legal authority. (Reference-Title 25, §71.61.d.2).
_____	_____	**VIII. Implementation Schedule and Justification for Selected Technical & Institutional Alternatives**
		A. Identify the technical wastewater disposal alternative which best meets the wastewater treatment needs of each study area of the municipality. Justify the choice by providing documentation which shows that it is the best alternative based on:
_____	10-11	1. Existing wastewater disposal needs. (Reference-Title 25, §71.21.a.6).
_____	10-11	2. Future wastewater disposal needs. (five and ten years growth areas). (Reference-Title 25, §71.21.a.6).
_____	10-11	3. Operation and maintenance considerations. (Reference-Title 25, §71.21.a.6).
_____	10-11	4. Cost-effectiveness. (Reference-Title 25, §71.21.a.6).
_____	10-11	5. Available management and administrative systems. (Reference-Title 25, §71.21.a.6).
_____	10-11	6. Available financing methods. (Reference-Title 25, §71.21.a.6).

_____ 10-11 7. Environmental soundness and compliance with natural resource planning and preservation programs. (Reference-Title 25, §71.21.a.6).

_____ 10-11 B. Designate and describe the capital financing plan chosen to implement the selected alternative(s). Designate and describe the chosen back-up financing plan. (Reference-Title 25, §71.21.a.6)

_____ 11 C. Designate and describe the implementation schedule for the recommended alternative, including justification for any proposed phasing of construction or implementation of a Sewage Management Program. (Reference – Title 25 §71.31d)

IX. Environmental Report (ER) generated from the Uniform Environmental Review Process (UER)

_____ NA A. Complete an ER as required by the UER process and as described in the DEP Technical Guidance 381-5511-111. Include this document as "Appendix A" to the Act 537 Plan Update Revision. Note: *An ER is required only for Wastewater projects proposing funding through any of the funding sources identified in the UER.*