

Pennsylvania Department of Environmental Protection

2 East Main Street
Norristown, PA 19401
June 25, 2009

Southeast Regional Office

Phone: 484-250-5970
Fax: 484-250-5971

Mr. Evan R. Andrews, P.E.
3001 Market Street
Philadelphia, PA 19104

Re: Application for Planning Modules
SCI Skippack East and West
DEP Code 1-46948-124-3
Skippack Township
Montgomery County

Dear Mr. Andrews:

On April 27, 2009, we received your application for a waiver from sewage facilities planning for SCI Skippack East and West Prisons. This project is located at Graterford and Perkiomen Creek Roads in Skippack Township, Montgomery County.

This project does not qualify for a waiver of sewage facilities planning for the following reasons:

1. This project is proposing a modification of the existing wastewater treatment plant, abandonment of the current spray irrigation land application system, and the construction of a new force main. A Clean Streams Law (CSL) permit is required. The submission of a planning module is also required when a CSL permit is required, in accordance with the Pennsylvania Code, Title 25, Chapter 71, Section 71.51(a)(4).

In completing the planning module, please indicate the proposed upgrade in Section G.2.a., and show all existing and proposed sewer extensions, force mains, pump stations, and the proposed modifications to the sewage treatment plant on the plot plan, as requested in Section G.3.e. In addition, please describe the proposed modifications to the wastewater collection, conveyance, and treatment facilities in the project narrative required in Section F of the planning module.

2. The submitted flow justification provided is inadequate. In order to justify a lower flow per prisoner than is being produced now, actual wasteload data from a similar prison with water conservation devices similar to those proposed must be provided. If wasteload data is unavailable, water meter readings with additional inflow and infiltration factors and peaking factors may be submitted.

In addition, the submission indicates that the existing prison will be retained and mothballed, to provide for additional future expansion. If the existing structure is to be retained on the property, the required sewage facilities planning module must demonstrate how sewage treatment and conveyance capacity for both the proposed prison and for the future use of the existing prison will be phased.

3. The Pennsylvania Natural Diversity Inventory (PNDI) receipt submitted only covers 907.4 acres of the 1,760-acre property. According to the Department of Environmental Protection's (Department) PNDI guidance, the entire site must be reviewed. In addition, if the project is too large for the online PNDI tool, the entire project must be submitted directly to all four jurisdictional agencies for review.
4. Skippack Township's current Official Sewage Facilities Plan, approved by the Department on December 12, 2003, provides for a state operated prison for 4,100 inmates on a 1,740-acre parcel. This proposed expansion is not consistent with the Township's official plan. A planning module is required when the official plan is inadequate to meet the sewage needs of the new land development (Section 71.51(a)(2)), or when changed facts, conditions or circumstances make the plan inadequate to meet the sewage needs of new land development (Section 71.51(a)(3)).
5. The abandonment of the existing sprayfields will result in an increase in the actual discharge to the intermittent streams on the property. The Department has concerns about the effect of the proposed discharge on these intermittent streams. When completing Section K.3 of the planning module, please refer to the Department's guidance document *Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers*, DEP ID 391-2000-014 (available in the e-Library on the Department's website). As indicated in this guidance, if it is feasible to discharge to an existing treatment works which has adequate capacity, or if it is feasible to discharge the effluent from the proposed treatment works to a stream where assimilative capacity exists, a discharge of wastewater to a dry or nearly dry drainage channel should not be considered.

Sewage Facilities Planning Module forms are now available from our eLibrary as MS Word Form Fields files directly from the Department's website at www.dep.state.pa.us. Under the Water heading, select Water Topics. Scroll to Wastewater Information and select it. In the left hand column, select Act 537 Sewage Facilities Electronic Forms. Under Act 537 Sewage Facilities - Administration Forms, select Act 537, Sewage Facilities Planning Packages. Under Planning Forms, select the appropriate forms. The link will take you to the eLibrary location for the form.

Please select the following forms for this project and enter the above-referenced Department Code Number on the first page of each form. Projects submitted without coding may be subject to delays, including the assignment of additional forms or different planning module packages.

Sewage Facilities Planning Module Transmittal Letter, Form 3800-FM-WSWM0355
Sewage Facilities Planning Module Resolution, Form 3800-FM-WSWM0356
Sewage Facilities Planning Module Component 3, Form 3800-FM-WSFR0353

- Instructions
- Form

Sewage Facilities Planning Module Component 4

- 4A-Municipal Planning Agency Review, Form 3800-FM-WSFR0362A
- 4B-County Planning Agency Review, Form 3800-FM-WSFR0362B
- 4C-County or Joint Health Department Review, Form 3800-FM-WSFR0362C

If you are unable to print the forms from our website, please contact us at the above phone number.

Please be advised that it is now the responsibility of the applicant or his consultant to complete a PNDI search to determine if there are potential conflicts with species or resources of special concern. The PNDI Environmental Review Tool is available to the public at www.naturalheritage.state.pa.us.

If the PNDI Project Environmental Review Receipt indicates that there are no impacts to species or resources of special concern, a copy of the signed and initialed PNDI receipt must be included with your planning module submission. No further action is necessary regarding PNDI coordination.

If the PNDI Project Environmental Review Receipt indicates that there are potential impacts to species or resources of special concern, your planning module submission must include the PNDI receipt and documentation from the affected agencies indicating that potential conflicts with species or resources under their purview have been resolved.

Please note that up-front planning module review fees are required to be included with your planning module submission.

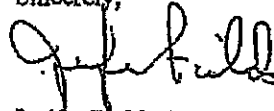
Mr. Evan R. Andrews, P.E.

- 4 -

June 25, 2009

If you have any questions, please call me at 484-250-5133.

Sincerely,



Jenifer Fields, P.E.
Regional Manager
Water Management

cc: Montgomery County Planning Commission
Mr. Locker, Jr. - Skippack Township
Pennsylvania Department of General Services
Planning Section
Ms. Vanous (via e-mail)
Mr. Cleaver (via e-mail)
Adam N. Bram, Esq. (via e-mail)
Re 30 (joh09wqm)176-8