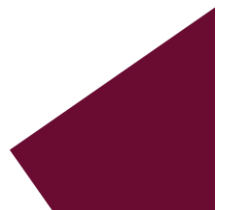




J

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## Appendix J: Correspondence





Herbert, Rowland & Grubic, Inc.  
501 Allendale Road, Suite 203  
King of Prussia, PA 19406  
484.460.7050  
www.hrg-inc.com

November 22, 2024

Mr. David Kovach, P.G., Project Review Manager  
Delaware River Basin Commission  
P.O. Box 7360  
25 Cosey Road  
West Trenton, NJ 08628

**Re: Eastern Pike County Regional Act 537 Plan**

Dear Mr. Kovach:

On behalf of Westfall Township, Milford Borough, and Matamoras Borough, we are pleased to submit the Eastern Pike County Act 537 Sewage Facilities Plan for your review and comment. A copy of the Act 537 Plan can be viewed/downloaded at:

<https://hrg3.box.com/s/jkzsinea5feq0osv2a2uz28v64cseflq>

At this time, the plan is being reviewed by the stakeholders and planning agencies. Upon receipt of planning agency comments and at the end of a thirty-day public comment period and if there are no comments received by the Delaware River Basin Commission (DRBC), the Westfall Township Board of Supervisors, Milford Borough Council, and Matamoras Borough Council will consider adoption of the Act 537 Plan by resolution so that the final document may be submitted to the Pennsylvania Department of Environmental Protection (PADEP) and the DRBC for official review.

Please feel free to give me a call if you have any questions.

Sincerely,

**Herbert, Rowland & Grubic, Inc.**

A handwritten signature in black ink that reads "Matthew Roberts".

Matthew Roberts, E.I.T.  
Staff Engineer II

MNR  
003054.0448

P:\0030\003054\_0448\Admin\Corres\Transmittals\used\2024.10.04 Plan Submission to Westfall Township PC.docx

## Roberts, Matthew

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**From:** Kovach, David [DRBC] <David.Kovach@drbc.gov>  
**Sent:** Thursday, January 30, 2025 3:09 PM  
**To:** Roberts, Matthew  
**Subject:** RE: Eastern Pike County Act 537 Plan

This message originated from outside your organization

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Hi Matt,  
I concur.

David Kovach P.G.  
Project Review Manager  
Delaware River Basin Commission  
25 Cosey Road  
West Trenton, NJ 08628-0360  
609-477-7264  
[David.kovach@drbc.gov](mailto:David.kovach@drbc.gov)

---

**From:** Roberts, Matthew <mroberts@hrg-inc.com>  
**Sent:** Wednesday, January 15, 2025 11:33 AM  
**To:** Kovach, David [DRBC] <David.Kovach@drbc.gov>  
**Subject:** [EXTERNAL] RE: Eastern Pike County Act 537 Plan

Good morning David,

As a follow up to our phone conversation last week, I wanted to clarify the comment about the capacity of the Westfall Plant (MATW WWTP) as we discussed on the phone and confirm we are on the same page.

As we discussed, the current DRBC Docket has the MATW WWTP rated for 374,000 GPD, and the projected flow from the Plan with selected structural alternatives is 267,155 GPD. There is a future reserve capacity separate from this Plan and previously allocated for a potential future Development referred to as Katz which is allocated 68,000 GPD. Even with the Katz Reserve Capacity, the MATW WWTP projected flow would be 335,155 GPD, which is below the permitted flow for the NPDES Permit and the DRBC Docket (374,000 GPD).

As a result, since the projected flow does not exceed the permitted flow, no upgrades to the WWTP would be anticipated to meet the existing Effluent Limitations. A DRBC Docket renewal would still be required since the service area is expanding into Milford Borough and Matamoras Borough as part of this Plan. Based on already permitted capacity, MATW WWTP should be able to accommodate the increased flow and effluent limits, and the ability to meet them is not an active concern and should not impact the ability to get the docket renewed. There are no specific concerns with the WWTP's capacity to meet the effluent limits, and no specific action needs to be done at this time or for Docket Renewal regarding plant capacity. Would you concur with this?

If you would like to discuss more, feel free to call or email me.

Best,  
Matt

Matthew Roberts, E.I.T.  
Staff Engineer II  
Herbert, Rowland & Grubic, Inc.  
501 Allendale Road, Suite 203  
King of Prussia, PA 19406  
484.460.7050  
[vCard](#) | [hrg-inc.com](http://hrg-inc.com) | [LinkedIn](#) | [Facebook](#)



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**From:** Kovach, David [DRBC] <[David.Kovach@drbc.gov](mailto:David.Kovach@drbc.gov)>  
**Sent:** Monday, January 6, 2025 3:25 PM  
**To:** Roberts, Matthew <[mroberts@hrg-inc.com](mailto:mroberts@hrg-inc.com)>  
**Subject:** RE: Eastern Pike County Act 537 Plan

This message originated from outside your organization

Hi Matt,

The inter-basin transfer of wastewater is not a concern as the relatively short flow path it would take otherwise (through septic systems) would likely ultimately result in a discharge to the Delaware River. DRBC's concern remains with the capability of the Westfall Plant to accommodate the increased flow and meet its effluent limits.

Please call or write with questions,

David Kovach P.G.  
Project Review Manager  
Delaware River Basin Commission  
25 Cosey Road  
West Trenton, NJ 08628-0360  
609-477-7264  
[David.kovach@drbc.gov](mailto:David.kovach@drbc.gov)

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**From:** Roberts, Matthew <[mroberts@hrg-inc.com](mailto:mroberts@hrg-inc.com)>  
**Sent:** Friday, November 22, 2024 5:46 PM  
**To:** Kovach, David [DRBC] <[David.Kovach@drbc.gov](mailto:David.Kovach@drbc.gov)>  
**Subject:** [EXTERNAL] Eastern Pike County Act 537 Plan

David,

I am reaching out regarding the Eastern Pike County Regional Act 537 Plan. This Act 537 Plan involves Milford Borough, Matamoras Borough, and Westfall Township, and the Plan proposes sewer extensions from these municipalities to the existing Municipal Authority of Township of Westfall (MATW) WWTP. The proposed alternatives are not increasing the Plant's capacity. previous version of the Plan was briefly reviewed by you in 2022, and one of the major changes is that Milford Township has withdrawn from the Plan. DRBC's only comment noted that all areas outside of Westfall Township are not a part of the current DRBC Docket (Docket No. D-2002-023 CP-6). If the Plan is approved by DEP, a DRBC docket revision/ update will be submitted to DRBC to note the changes in the Areas Served.

I have attached a Transmittal Letter with a Link to the Plan in the Letter. If you have trouble accessing the Link, please let me know.

As we are working on submitting a revised Plan to submit to DEP after comments, there were a few items we have discussed in the past that I would like to have documented as well as officially transmitting to you a copy of the pre-final Plan. We had a phone conversation in July or August of this past year regarding anti-degradation and inter-basin transfer of groundwater baseflow, especially since these watersheds are EV or HQ. When we discussed this, you had indicated that from a DRBC jurisdiction standpoint, this was not an item of concern from a DRBC Jurisdiction standpoint due to the proximity to the Delaware River as well as the fact it is not leaving the Delaware River Basin. I have attached the Hydrology Map which shows the watersheds as well as Selected Alternative for Milford Borough. Could you please confirm regarding any inter-basin groundwater transfer concerns from a DRBC standpoint? If you would like to discuss this further, please feel free to give me a call.

Please let me know if you have any questions.

Best,  
Matt

Matthew Roberts, E.I.T.  
Staff Engineer II  
Herbert, Rowland & Grubic, Inc.  
501 Allendale Road, Suite 203  
King of Prussia, PA 19406  
484.460.7050  
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