



Carroll Engineering Corporation

September 19, 2016

Revised: September 20, 2016

Robert R. Pingar, P.E., Township Manager
Westtown Township
P.O. Box 79
Westtown, PA 19395

Dear Rob:

Subject: Toll Brothers Crebilly Farm

We have completed our evaluation of available capacity at the West Goshen Sewer Authority wastewater treatment plant (WGSA), and current Act 537 planning for the Crebilly Farm property and West Goshen Township drainage area. We reviewed the 1998 Sewage Treatment Agreement between West Goshen Township and Westtown Township; the 2015 Chapter 94 Report for the West Goshen Township drainage area; and the 2001 Act 537 Plan and 2005 Addendum, and 2012 Act 537 Special Study and subsequent Act 537 Special Studies. Copies of relevant pages of the documents are enclosed.

Two development proposals are being considered for Crebilly Farm with either 300 or 347 new EDU's. Based on 250 gallons per day (GPD) per EDU, 75,000 GPD or 86,750 GPD of wastewater will be generated.

Section 3.02 of the 1998 Sewage Treatment Agreement allows Westtown Township to discharge a maximum of 530,000 (GPD) of wastewater to West Goshen Township. In 2015, Westtown conveyed an average daily flow on a monthly basis of 237,187 GPD, leaving a balance of capacity of 292,813 GPD. In addition to the 2015 average daily flow, 10 condominiums were projected to connect in 2016, for a total of 2,500 GPD of additional flow. The 15-lot Westtown Woods subdivision will add an additional 3,750 GPD. Current projected flow when the foregoing connections are made is 243,437 GPD, leaving a balance of 286,563 GPD of capacity.

The 2001 Act 537 plan and 2005 Addendum identified projected flows from the West Goshen Township drainage area including the Route 202 drainage area. Crebilly Farm is described as being served by a new community system. Since Crebilly Farm is identified as being the subject of a comprehensive planning study to evaluate mixed use alternatives for the site, flow projections are not identified, nor do the West Goshen Township flow projections include projections from Crebilly Farm. Flow projections for the West Goshen Township drainage area including the Route 202 drainage area in the 2001 Act 537 Plan are 166,500 GPD. The 2005 Addendum does not change the projection. The 2012 Act 537 and subsequent Special Studies focus on the eastern portion of the Township covered by the Chester Creek Wastewater Treatment Plant drainage area. The Special Studies do not change the flow projections for the West Goshen Township drainage area.

Today's Commitment to Tomorrow's Challenges

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Based on current average daily flow in 2015, current projections in the Chapter 94 Report, current subdivisions under review, and flow projections for the 2001 Act 537 Plan, the total projected flow in the West Goshen Drainage Area is 409,937 gallons per day, leaving a balance of 120,063 GPD of capacity. The 300 EDU development proposal for Crebilly Farm will generate 75,000 GPD of wastewater for a total projected flow of 484,937 GPD. The 347 EDU development proposal will generate 86,750 GPD for a total projected flow of 496,687 GPD. Flow projections including flow from either development proposal will leave the Township with less than 10% of available capacity remaining in WGSA. This may raise concerns from a sewage facilities planning standpoint about the need to purchase additional capacity if the out of date Act 537 flow projections remain as is.

While both the 2001 Act 537 Plan and 2005 Addendum are out of date (beyond the 10-year time frame for sewage facilities planning), the flow projections are still in effect, because the flow projections were not modified in subsequent Act 537 Planning. Westtown Township's current sewage facilities planning is focused on the continued use of on-lot disposal systems through the implementation and enforcement of the Township's Sewage Management Program eliminating the capacity projections contained in prior Act 537 planning. Therefore, sewage facilities planning for Crebilly Farm should address existing out of date Act 537 Planning to revise flow projections in the West Goshen Township drainage area. This can be accomplished by including a narrative and flow projections prepared by the Township in the planning module for Crebilly Farm.

Should you have any questions or require additional information, please feel free to contact this office.

Very truly yours,

CARROLL ENGINEERING CORPORATION



William N. Malin, P.E.

WNM:cam
Enclosures
cc: Andrew Semon, Toll Brothers, Inc. (w/Enclosures)