



PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

September 30, 2019

Honorable Patrick McDonnell  
Secretary  
PA Department of Environmental Protection  
PO Box 2063  
Harrisburg, PA 17105-2063

Dear Secretary McDonnell:

Re: PSATS Comments on Draft Technical Guidance: Site Suitability and Alternatives Analysis Guidelines for New Land Development Proposing On-lot Sewage Disposal (#385-2207-001)

We write to provide our comments regarding the Department of Environmental Protection's recently proposed Draft Technical Guidance: Site Suitability and Alternatives Analysis Guidelines for New Land Development Proposing On-lot Sewage Disposal (#385-2207-001).

The Pennsylvania State Association of Township Supervisors is a non-partisan, non-profit member service organization. Our member townships represent 5.6 million Pennsylvanians — more residents than any other type of Pennsylvania municipal government. PSATS member townships cover 95 percent of the commonwealth's land mass.

PSATS members are committed to effective and efficient treatment and disposal of sewage waste. We welcome this opportunity to submit public comment and offer our support to this draft site suitability guidance document.

These guidelines are designed to provide a systematic approach to sewage facilities planning for new land development when using on-lot sewage systems or, more importantly, when a land development proposal intends to incorporate alternative on-lot sewage disposal systems.

As you know, the Pennsylvania Sewage Facilities Act established the framework for the development and implementation of municipal plans to ensure the sanitary disposal of sewage waste.

Now that the Pennsylvania Sewage Facilities Act has been amended (Act 26 of 2017) land development applicants may now apply for either a conventional or an alternate on-lot system that is permittable by a municipal sewage enforcement officer. Now new land development applicants need only pay for one sewage evaluation, a significant savings to applicants.



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To fully implement this new requirement, general site suitability requirements needed to be developed to properly evaluate applications that propose the use of alternate on-lot sewage disposal systems. DEP began the development of the alternate system site suitability requirements which are the subject of this draft guidance document in consultation with its Sewage Advisory Committee (SAC).

Of most concern to our members during the development of these new site suitability requirements was the matter of the sewage system alternatives evaluation, which, among other things, requires municipalities to evaluate and implement options to provide for the proper operation and maintenance (O&M) of on-lot sewage systems to ensure the long-term sanitary treatment and disposal of sewage.

We support the department's clear language in Step 4(g)(2) which limits a municipality's obligation to ensure the long-term O&M of such alternate systems for only those lots within the proposed new land development.

If you have any questions on these matters, please contact us. Thank you.

Sincerely ,

David M. Sanko

Executive Director