THE COUNTY OF CHESTER

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MARGARET C. RIVELLO, M.B.A.
County Health Director

RECEIVED
JUL 02 2010
BY: Denise Miller

June 29, 2010

Ms. Denise Miller
East Fallowfield Township
2264 Strasburg Road
East Fallowfield, PA 19320

Re: South Brandywine Middle School
Code No.: 1-15918-229-X
East Fallowfield Township

Dear Ms. Miller:

This Department has received materials pertaining to the redevelopment plan for South Brandywine Middle School entitled Preliminary Land Development Plan New Construction South Brandywine Middle School for Coatesville Area School District. The plan was prepared by Gilbert Architects Inc. on May 20, 2009 and has no revisions. The plan proposed the demolition of the old School and creation of a new School including storm water facilities and playing fields and a track on 52.2 acres of land located along Doe Run Road in East Fallowfield Township. The developer intends to utilize the existing sewage facility and public water supplies.

This Department has completed its review of the redevelopment materials noted above. DEP has determined that this project does not require planning. However, your request to evaluate the adequacy of the existing system has an associated fee of $200 that will be required by CCHD. Please forward this fee to this Department.

After reviewing the information submitted we offer the following comments:

The developer requested planning approvals from the municipality for Phase 1 and Phase 2 of the above noted project. K & W Engineers, in its' Memorandum dated June 21, 2007, states that "Phase 1 will not involve an increase in student population or sewer flows". Additionally, the memorandum states that "Phase 2 will involve the construction of a new elementary school facility and that a separate DEP Sewer Application Mailer will be sent at that time". The project proposes concurrent approval of both phases but contains no language that restricts Phase 2 until any potentially required planning has been complete. The only restriction noted is General Note # 13 that states that a building permit will not be issued until a sewer permit is issued by the Chester County Health Department. Though we agree concerning the possible need to issue a permit, we do not feel that approval of both phases is appropriate at this time.

The DEP response letter dated November 14, 2007, which waived planning includes language that refers to "additions and renovations to the South Brandywine Middle School". There is no reference to the demolition of the existing building and construction of a new school, and the reuse of the existing on-lot septic system. A new Sewage Facilities Planning Module Application Mailer must be sent to DEP

outlining all of the details of both phases of the project in order to determine if Phase 2 will be required to complete Sewage Facilities Planning. This will establish whether both phases can be approved at this time.

K&W Engineer's letter dated June 11, 2010, states that there will be no increases of the number of students and then states that the maximum number of students was 738. Then it states that the proposed new school capacity is 750 students. **This is an increase**. The student population for 2008-2009 was only documented to be 595 students. Additionally, there is no mention of the number of teachers, cafeteria workers, office workers and aides. They must be included in order to accurately determine the actual total flow figure.

Since the septic system was installed in 1957 there is no permit data available. There is no documentation of the system capacity. It can also be assumed that after this amount of time the system capacity is very likely diminished. This Department cannot approve of a Change in Use/Amended Sewage Flow for this project to continue use of the existing system due to the obvious increased flows resulting from the increased student/teacher/staff population as noted above. We must also assume that the population has increased over the years since 1957. The student and staff historical maximum cannot be increased and must be capped. We could use the 2009-2010 population, including all students and staff, in determining historical capacity.

In order to ensure that the facility can meet the long term sewage needs for this project, a tested on-lot replacement area should be provided. Alternately, an approval for public sewage connection can be documented. This would require planning. Either would ensure a means of providing adequate, on-going, long-term sewage facilities for the school if the current 53 year old system should malfunction. The Township and DEP may have other restrictions.

The Utility Notes in the plans refer to sanitary sewers; therefore we are not sure exactly what is being proposed. Please clear up these discrepancies.

Flow figures used to design *on-lot septic systems* utilize peak daily flow rates, not average flow rates. Flow rates according to Chapter 73, subsection 73.17 (b) for on-lot systems for schools, day (with cafeterias, gym and showers per student and employee) is 25 gallons/person a day. You have provided figures based on the use of public sewerage facilities. This is not an appropriate comparison when discussing on-lot sewage facilities. DEP has determined that actual water meter or sewer meter flow data indicating peak daily flows over a one year period for a similar non-residential establishment may be accepted for use in sizing the on lot disposal system. If average daily flows are used, the peak daily flow shall be calculated by multiplying the average daily flow by two.

Soil test pit evaluations and percolation testing must be conducted if the replacement area option noted above will be pursued. The project coordinator should contact this Department to schedule such testing. A fee of $950 would be required to cover plan review and site testing necessary to identify that area. An additional permit fee of $1600 will be required if a permit is to be issued. Sewage Application Record Forms need to be completed and submitted and fees paid before testing can be scheduled.

Please do not hesitate to call me at 610-344-6241 if you have any questions.

Sincerely,

Patty Lynch

Patty Lynch
Environmental Health Specialist

cc: K&W Engineers
East Fallowfield Township Planning Commission
Mr. John Veneziale, Pennsylvania Department of Environmental Protection
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