



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

December 9, 2011

**HAND DELIVERY**

Lydia Guy  
Regional Hearing Clerk (3RC00)  
U.S. EPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: **In the Matter of Sewer Authority of City of Scranton**  
**U.S. EPA Docket No. CAA-03-2012-0006**

Dear Ms. Guy:

Enclosed please find the original and one copy of Attachment A to the Consent Agreement and Final Order, which was inadvertently omitted from the original filing, along with a certificate of service.

Sincerely yours,

A handwritten signature in cursive script that reads "Cynthia T. Weiss".

Cynthia T. Weiss  
Senior Assistant Regional Counsel

Enclosures

cc: Cabell Vest, Esq.  
Michael Welsh, P.E. (3HS61)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

December 9, 2011

T. Cabell Vest, Esquire  
Aqua Law PLC  
6 South 5<sup>th</sup> Street  
Richmond, Virginia 23219

Re: **In the Matter of Sewer Authority of City of Scranton**  
**U.S. EPA Docket No. CAA-03-2012-0006**

Dear Cabell:

Enclosed please find a copy of Attachment A to the Consent Agreement and Final Order, which was inadvertently omitted from the original filing on December 5, 2011. Attachment A is being filed with the Regional Hearing Clerk today.

Sincerely yours,

A handwritten signature in cursive script that reads "Cynthia T. Weiss".

Cynthia T. Weiss  
Senior Assistant Regional Counsel

Enclosure

cc: Michael Welsh, P.E. (3HS61)



**ATTACHMENT A**

## SUPPLEMENTAL ENVIRONMENTAL PROJECT PROPOSAL

### Scranton Sewer Authority

- Project Title:** Urban Forest Installation and Restoration
- Geographic Area of Interest:** South Side Neighborhood, City of Scranton, Pennsylvania
- Name of Responsible Entity:** The Scranton Sewer Authority (the "SSA") will be responsible for and fund the work. The project will be managed by Tony Santoli, a retired forester and chair of the City of Scranton Shade Tree Commission (the "Commission").<sup>1</sup> A private contractor, under contract with the SSA, will perform the installation and restoration.
- Project Cost:** \$30,000.00 (±100 trees @ ±\$300.00 per tree)
- Contact:** Eugene P. Barrett  
Executive Director  
Scranton Sewer Authority  
312 Adams Ave.  
Scranton, Pennsylvania 18503  
570-348-5330  
570-348-5359 (Fax)
- Project Description:** An analysis of trees in the urbanized portion of Scranton, Pennsylvania, performed by the United States Department of Agriculture Forest Service Northern Research Station resulted in a tree priority planting index (the "Index").<sup>2</sup> The Index reveals there is a significant need for urban forest installation and restoration in the City's South Side Neighborhood. The SSA is utilizing its forces to canvas the South Side Neighborhood to select tree locations and increase public awareness. The SSA will fund the purchase of approximately 100 trees and will cause these trees to be installed by a private contractor this fall in the identified locations. The trees will be a combination of native tree species, including red maple, gray birch, black cherry and northern red oak, which are the four most common species in the urban forest. The trees will be planted in the public right-of-way.

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<sup>1</sup> The Commission supervises, manages and regulates the planting and seeding of shade trees throughout the City of Scranton, Pennsylvania. The Commission is appointed by the Mayor with the advice and consent of the City Council, and is expressly authorized to receive funds from grants and any other source in order to fulfill its purposes. The Commission is currently in need of funds to purchase suitable trees to fulfill its mission.

<sup>2</sup> Appendix V Tree Planting Index Map, *Assessing Urban Forest Effects and Values: Scranton's Urban Forest*, USDA Forest Service Northern Research Station, Resource Bulletin NRS-43, 28 June 2010.

- Environmental Benefits:** Poor air quality, a common problem in many urban areas, can lead to human health problems, damage to landscape materials and ecosystem processes and reduced visibility. Generally, urban forests improve air quality by reducing air temperature, directly removing pollutants from the air and reducing energy consumption in buildings, which consequently reduces power plant emissions. The SSA expects that the proposed tree installation and restoration project will remove air pollution (including CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub> and SO<sub>2</sub>). Additionally, the SSA anticipated that the proposed project will help mitigate climate change by sequestering atmospheric carbon (from CO<sub>2</sub>) and by reducing energy use - thereby reducing emissions from fossil-fuel power plants. The proposed trees should also reduce the heat island effect in South Side Neighborhood of Scranton. The SSA further anticipates that proposed project will have an aesthetic benefit for residents of the South Side Neighborhood, enhancing overall quality of life. The proposed project is expected to have a positive environmental justice component, because the Index is a type of "environmental equity" index (areas with higher human population density and lower tree cover tend to get the higher index value). Finally, as part of its canvassing efforts, the SSA is noting the addresses of properties whose leaders/downspouts are connected to the SSA's system and will provide notice to the properties' owners offering assistance in disconnecting these unauthorized connections. The SSA expects that this effort will contribute to improved operation of its system and treatment plant, which will have an overall positive effect on water quality in the Lackawanna River.
- Completion Date:** All tree planting will be completed on or before November 30, 2011, assuming an effective date of September 20, 2011 for the Consent Order and Final Agreement between US EPA and the SSA.
- Deliverables:** On or before November 30, 2011, the SSA shall certify in writing that each of the purchased trees was planted in the South Side Neighborhood and the location of same.

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REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

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EPA REGION III, PHILA. PA

<b>In the Matter of:</b>	)	<b>EPA Docket No. CAA-03-2012-</b>
<b>Sewer Authority of City of Scranton</b>	)	<b>0006</b>
<b>307 North Washington Avenue</b>	)	
<b>Scranton, Pennsylvania 18503,</b>	)	
	)	
<b>Respondent.</b>	)	<b>Proceedings Pursuant to Sections</b>
	)	<b>112(r) and 113 of the Clean Air</b>
<b>Scranton Sewer Authority</b>	)	<b>Act, 42 U.S.C. §§ 7412(r) and 7413</b>
<b>Wastewater Treatment Plant</b>	)	
<b>Cedar Avenue and Breck Street</b>	)	
<b>Scranton, Pennsylvania 18505,</b>	)	
	)	
<b>Facility.</b>	)	

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the date provided below, I hand-delivered and filed the original of Attachment A to the Consent Agreement and Final Order, along with enclosures and/or attachments, for the above-referenced matter, with the Regional Hearing Clerk, EPA Region III, 1650 Arch Street, Philadelphia, Pennsylvania 19103-2029, and that a true and correct copy of the Consent Agreement and Final Order, along with its enclosures and/or attachments, was sent to:

Via certified mail, return receipt requested

T. Cabell Vest, Esquire  
Aqua Law PLC  
6 South 5<sup>th</sup> Street  
Richmond, Virginia 23219

**DEC 09 2011**

Date

*Cynthia T. Weiss*

Cynthia T. Weiss (3RC42)  
Senior Assistant Regional Counsel