

**Application of Pennsylvania-American Water Company for Acquisition of
the Wastewater Assets of the Township of Exeter**

66 Pa. C.S. §1329

**Application Filing Checklist – Water/Wastewater
Docket No. A-2018-_____**

20. Proof of Compliance. Provide proof of compliance with applicable design, construction and operation standards of DEP or of the county health department, or both, including:
- e. Provide documentation evidencing a 5-year compliance history with DEP with an explanation of each violation for the seller's utilities that have been providing service as well as provide a copy of any DEP-approved corrective action plans.

RESPONSE:

- e. See enclosed letter and corresponding documents.

Exeter Township
Berks County, Pennsylvania
4975 DeMoss Road
Reading PA 19606
www.exetertownship.com



Office: 610-779-5660
Fax: 610-779-5950
Engineering: 610-779-5702
Parks & Rec.: 610-406-0263
Police: 610-779-1490
Treatment Plant: 610-582-8300

EXETER TOWNSHIP

Board of Supervisors

September 4, 2018

Michael Salvo
Senior Manager, Business Development
Pennsylvania American Water Company
800 West Hersheypark Drive
Hershey, PA 17033

Re: Exeter Township, Berks County
Sanitary Sewer System

Dear Michael:

Please be advised to the best of my knowledge and belief that Exeter Township has been in compliance with PaDEP's rules and regulations relating thereto for the past five (5) years.

All violations that have occurred during the past five (5) years have been resolved.

If you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to be "J. Granger".

John A. Granger
Township Manager



NPDES COMPLIANCE INSPECTION REPORT

NPDES Permit No.	Mo/Day/Yr	Entry Time	Exit Time	Inspection Type	eFACTS Inspection ID
PA0026972	8/7/2018	14:15		INCDT	2767299
Facility Name: Exeter Township			Permittee Name: Exeter Township		
Physical Location/Directions: MH 10, Exeter Scenic River Trail (40.28994, -75.87685)				Permit Expiration Date: 2/28/2013	
Municipality Exeter TWP		County Berks		Permit Renewal Application Due: pending	
Facility Type: <input checked="" type="checkbox"/> Sewage <input type="checkbox"/> Industrial Waste <input type="checkbox"/> Industrial Stormwater <input type="checkbox"/> Other: <input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor					
Responsible Person: Mr. John Granger			Certified Operator Required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Title: Township Manager			Certified Operator in Responsible Charge: Daniel Farris		
Permittee Address: 4975 DeMoss RD Reading, PA 19606			Client ID: 189483 Class-Subclass(es): A,E (1,2,3,4) Circuit Rider: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Business Phone: 610-779-5660 Fax: 610-779-5950 Email: JGRANGER@EXETERTOWNSHIP.COM			Business Phone: 610-401-0010 Cell: 610-506-1876 Email: dan@backflowdevicetesting.com		
24-Hour Emergency Contact Person / Phone:					
VIOLATIONS: (list below)		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Pending Sample Results			
<p>Discharge of raw or untreated sewage from the Exeter Township sanitary sewer collection system to the surface of the ground is a violation of PA Clean Streams Law, Sections 201 & 202.</p> <p>*Area received 3.61" of rain 8/3/2018-8/4/2018 (wunderground Reading Regional- Spaatz Station)</p> <p>Incident inspection today. Notification of a sanitary sewer overflow at MH 10 was received via the emergency line on 8/4/2018 at 15:34. Lime has been applied to the area of the overflow. Initial volume estimate from Exeter was ~50 gallons. No apparent remaining sewage solids were observed.</p>					
Person Interviewed:		Date:	Inspector:		Date:
			Kevin Buss		8/13/2018
Signature:		Inspector Signature:		Phone No.:	
				610-916-0132	
Title Water Quality Specialist					
Email: kbuss@pa.gov					
<p>This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records.</p>					

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EXETER TOWNSHIP

Board of Supervisors

April 12, 2018

Kevin W. Buss
Water Quality Specialist
Department of Environmental Protection
Reading District Office
1005 Crossroads Boulevard
Reading, PA 19605

RE: Sewage – B Exeter Township Wastewater Treatment Plant
MPDS Permit No. PA0026972

Dear Mr. Buss:

This is a follow-up to the Notice of Violation dated March 15, 2018. The following is a summary of the incident that occurred.

3/1/2018

Influent screen was check at 7 PM before maintenance left for the day

3/2/2018

4:50 AM - Mechanic arrives on site. And sees influent running out of Grit Building door. He calls Ops staff.

5:10 AM - Ed arrives and turns screen in manual, to clear screen.

5:30 AM - They then went outside to see where and how much sewage overflowed. Most of the flow followed the driveway to the old sludge drying beds and filled them. With a small part entering storm sewer 003.

6:35 AM - Called DEP Emergency Line.

7:15 AM - Mr. Buss arrived, toured facility and overflow area.

10:20 AM - Inspected storm sewer 003 discharge. Some paper products observed, but none in standing water or ground in the area.

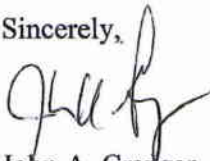
11:45 AM - Inspection completed and received direction from Mr. Buss.
12:30 PM - Used trash pump and equalized sewage between drying beds 1,2,3,& 4. Sewage is draining thru the beds and back to the head of the plant.
1:00 PM - Called Mr. Brent at Pottstown Water Plant.
1:10 PM - Township Road Crew staff on site assisting with cleanup of paper products inside and out of the plant.
2:00 PM - Inspected Screen again for operation and clean up. Everything is ok.

Inspection of the screen revealed that the compactor had become totally jammed due to the roping of chicken feathers, causing the equipment to shut down.

The entire site was cleaned for plant staff with the assistance of the Township Highway Department. Sewage levels in the drying beds were equalized per DEP's request that day. After the sewage drained back into the influent wet well, the drying beds were cleaned. All stormwater inlets, pipes and outlets were cleaned and flushed. All driveway areas were cleaned and washed down. Lime was spread in the grass areas at the stormwater outlet. A new ultrasonic head for automatic controls of the screen has been ordered. The existing one was shorted out when the sewage overflowed. When the new one is installed it will be raised 36" above the influent channel to keep it clear from water damage. The staff has significantly increased the inspection of the site and the cleaning of the screen to remove buildup of debris. The staff will be in contact with the apparent industry that is causing the matter.

Should you have any questions, do not hesitate to contact me. Thank you.

Sincerely,



John A. Granger
Township Manager

MY COPY



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

March 15, 2018

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7017 1070 0000 7523 3063

Mr. John Granger
Exeter Township
4975 DeMoss Road
Reading, PA 19606-9060

Re: Sewage 3-B
Exeter Township Wastewater Treatment Plant
NPDES Permit No. PA0026972
Exeter Township, Berks County

Dear Mr. Granger:

As a follow-up to our March 2, 2018 field investigation of a discharge of raw sewage onto the surface of the ground and to stormwater collection, I am requesting that you submit a full report of your own independent investigation to include the circumstances leading to the incident, the details of the incident itself, and the measures taken to alleviate the problem, with associated dates and times. Any additional preventive measures you are planning should be outlined with an implementation schedule. We ask that you submit this report within ten days of the date of this letter.

The above-referenced discharge constitutes a violation of Sections 201 and 202 of The Clean Streams Law, 35 P.S. Section 691.1 et seq. A copy of the field investigation report is enclosed for your records.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you, or the responsible private-party will be notified of the action.

Your response in conjunction with the conclusions of our investigation will determine the extent to which the penalty provisions of The Clean Streams Law may apply. If you have any questions, please call me at 610.916.0132.

Sincerely,

Kevin W. Buss
Water Quality Specialist
Clean Water Program

Mr. John Granger

- 2 -

March 15, 2018

bcc: Victor Landis (electronic bcc)
Summer Kunkel (electronic bcc)
Erick Ammon (electronic bcc)
Andrew Hall (electronic bcc)
File
T



SEWAGE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. PA0026972	Mo/Day/Year 3/02/2018	Entry Time 0830	Exit Time 10:15	Inspection Type INCDT	eFACTS Inspection ID 2700488
Facility Name: Exeter Township WWTP			Permittee Name: Exeter Township		
Physical Location/Directions: 400 Hanover ST, Birdsboro, PA 19508				Permit Expiration Date: February 28th, 2013	
Municipality: Exeter Township		County: Berks		Permit Renewal Application Due:	
Facility Type: <input checked="" type="checkbox"/> Municipal <input checked="" type="checkbox"/> Major <input type="checkbox"/> Non-Municipal <input type="checkbox"/> Minor		Treatment Process: <input checked="" type="checkbox"/> Ext Aeration <input type="checkbox"/> Contact Stabilization <input type="checkbox"/> SBR <input type="checkbox"/> RBC <input type="checkbox"/> MBR <input type="checkbox"/> MBBR/IFAS <input type="checkbox"/> Trickling Filter <input type="checkbox"/> Lagoon			
Design Flow: MGD		<input type="checkbox"/> Other:			
Responsible Official: Mr. John Granger			Does the facility have an Operator in Responsible Charge: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Title: Township Manager			Operator Name: Daniel Ferris		
Permittee 4975 DeMoss RD Address: Reading, PA 19606			Circuit Rider: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
			Client ID: 189483 License Expiration Date:		
			Class-Subclass(es): AE 1,2,3,4		
			Operator properly certified for treatment process type: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Business Phone: 610-779-5660			Business Phone: 610-401-0010		
Cell Phone:			Cell Phone: 610-506-1876		
Email: jgranger@exetertownship.com			Email: epribish@exetertownship.		
24-Hour Emergency Contact Person / Phone / Email: Mr. Ed Pribish 610-385-4254					
VIOLATIONS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> None Identified During Inspection <input type="checkbox"/> Pending Sample Results					
Discharge of raw sewage from the headworks building to the surface of the ground and to the stormwater collection system is a violation of the Clean Steams Law, Section 201 & 202.					
Recommendations: I recommended cleaning up debris today. When the water recedes, please apply lime to affected areas. Please submit an incident summary within 5 days.					
Person Interviewed:		Date:	Inspector: Kevin Buss		Date: 3/2/18
Signature:		Phone No.:	Inspector Signature: <i>Kevin Buss</i>		Phone No.: 610-916-0132
Title:			Title: Water Quality Specialist		
Email:			Email: kbuss@pa.gov		
This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. * Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and/or review of Department records.					

Comments

INCDT inspection was conducted today was with Mr. Ed Pribish, certified operator. An overflow occurred at influent screening when the level control for the mechanical screen failed. At the time of inspection the mechanical screen is on "Hand" mode. The screen clogged and the influent channel overflowed. Raw sewage left the headworks building through the garage door (figure 1).

Overflow was discovered at ~05:00 on 3/2/2018 and report to the emergency line at 06:35 on 3/2/2018. Overflow began sometime between 1900 on 3/1/2018 and 0500 on 3/2/2018. Discharge volume is unknown but Mr. Pribish estimated >200,000 gallons.

Flow primarily ran east after leaving the garage door. At the time of inspection there are rags and debris along the driveway between the headworks building and final clarifier 3. At least two storm drains were impacted. Flow terminated at the sludge drying beds. There is standing water on the drying beds with no apparent flow leaving. Mr. Pribish plans to remove standing water with trash pumps to prevent discharge.

I checked stormwater outfall 4 and did not see any debris.

Sewage discharged through stormwater outfall 3, near the chlorine contact tank, and entered an area with ponded stormwater. There is debris in the stormwater near the outfall. Flow away from this area appears limited. I walked around the ponded area and there does not appear to be a direct discharge to the Schuylkill River, however much of the surrounding area also holds ponded stormwater and some mixing may have occurred. I recommended notifying downstream users.

Treatment units were observed and appeared to be operating normally. The chlorine building was observed- broken line has been replaced. Flow at the time of inspection is ~12 mgd.

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EXETER TOWNSHIP

Board of Supervisors

March 9, 2018

Kevin W. Buss
Water Quality Specialist
Department of Environmental Protection
Reading District Office
1005 Crossroads Boulevard
Reading, PA 19605

Dear Mr. Buss:

This is in response to your correspondence dated February 14, 2018 with respect to the failure of the chlorination system at the Exeter Township Wastewater Treatment Plant.

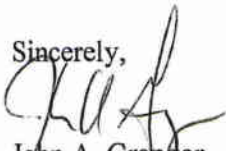
The chlorination loss that was experienced at the Wastewater Treatment Plant on January 14, 2018 was due to a broken vacuum line. The line had cracked approximately a ¼ inch from the chlorinator. It was immediately repaired so that the Plant could assume normal operations.

The Emergency Response Plan was incorrectly labeled and filed in a different office. The labeling has been corrected. The Emergency Response Plan is available throughout the Treatment Plant.

Your Inspection Report No. 2688126 refers to the Plant struggling with low chlorine residuals. The vacuum line repair corrected the low chlorine residuals. The denitrification issues and high ammonia issues have been corrected. The Plant has been meeting chlorine residuals since the repair.

Should you have any questions, do not hesitate to contact me. Thank you.

Sincerely,


John A. Granger
Township Manager



SEWAGE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. PA0026972	Mo/Day/Year 1/29/2018	Entry Time 09:30	Exit Time 11:30	Inspection Type RTPT	eFACTS Inspection ID 2688126
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Facility Name: Exeter Township WWTP	Permittee Name: Exeter Township
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Physical Location/Directions: 400 Hanover ST, Birdsboro, PA 19508	Permit Expiration Date: February 28th, 2013
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Municipality: Exeter Township	County: Berks	Permit Renewal Application Due:
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Facility Type: <input checked="" type="checkbox"/> Municipal <input checked="" type="checkbox"/> Major <input type="checkbox"/> Non-Municipal <input type="checkbox"/> Minor	Treatment Process: <input checked="" type="checkbox"/> Ext Aeration <input type="checkbox"/> Contact Stabilization <input type="checkbox"/> SBR <input type="checkbox"/> RBC <input type="checkbox"/> MBR <input type="checkbox"/> MBBR/IFAS <input type="checkbox"/> Trickling Filter <input type="checkbox"/> Lagoon
Design Flow: MGD	<input type="checkbox"/> Other:

Responsible Official: Mr. John Granger	Does the facility have an Operator in Responsible Charge: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Title: Township Manager	Operator Name: Daniel Ferris
Permittee 4975 DeMoss RD Address: Reading, PA 19606	Circuit Rider: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Client ID: 189483 License Expiration Date:
	Class-Subclass(es): AE 1,2,3,4
	Operator properly certified for treatment process type: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Business Phone: 610-779-5660	Business Phone: 610-401-0010
Cell Phone:	Cell Phone: 610-506-1876
Email: jgranger@exetertownship.com	Email: epribish@exetertownship.

24-Hour Emergency Contact Person / Phone / Email: **Mr. Ed Pribish 610-385-4254**

VIOLATIONS: Yes None Identified During Inspection Pending Sample Results

Failure of the dechlorination system on January 14, 2018 is a violation of Part B of your NPDES Permit, Proper Operation and Maintenance.

Failure to immediately notify the department and downstream users of a chlorine system failure is a violation of Part A of your NPDES Permit, Unanticipated Noncompliance or Potential Pollution Reporting.

Recommendations:
I strongly recommend developing an emergency response plan including emergency phone number/downstream notification list.
I recommend checking plant effluent chlorine residual twice daily.

Person Interviewed:	Date:	Inspector: Kevin Buss	Date: 1/30/18
Signature:	Phone No.:	Inspector Signature: <i>Kevin Buss</i>	Phone No.: 610-916-0132
Title:	Title: Water Quality Specialist		
Email:	Email: kbuss@pa.gov		

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