

**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:
- f. Provide documentation evidencing a 5-year compliance history with DEP of other utilities owned or operated, or both, by the buyer, including affiliates, and their officers and parent corporations with regard to the provision of utility service.⁴

RESPONSE:

- f. Pennsylvania-American Water Company received one Notice of Violation (“NOV”) from the Pennsylvania Department of Environmental Protection (“DEP”) in the past five years in connection with a routine inspection of its Glen Alsace-area operations regarding three wells being operated in excess of their permitted maximum instantaneous pumping rates. No other water or wastewater violations in PAWC’s neighboring operating areas were received. See enclosed NOV dated September 2, 2015; PAWC’s response and summary of corrective actions taken dated September 25, 2015.

⁴ Regarding Checklist Item 20(f), Class A public utilities need only submit compliance history for operations in the neighboring areas or a statement attesting to their compliance with this item.



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September 25, 2015

CERTIFIED MAIL 7012 3050 0001 xxxx xxxx

Susan M. Werner
Safe Drinking Water Supervisor
Pennsylvania Department of Environmental Protection
1005 Cross Roads Boulevard
Reading, PA 19605

Re: PA Safe Drinking Water Act
Glen Alsace System
PWS ID #3060088
Exeter Township, Berks County

Dear Susan:

Thank you for meeting with us on September 10, 2015 to discuss the Notice of Violation we have received for our Glen Alsace System. We appreciate your time and discussion on the operations of the groundwater wells and details on the approved written permits from the Department and the manner at which these wells are to be operated.

Included in this letter is our plan of action to address the concerns of the Notice of Violation and maintain continuous system compliance for our Glen Alsace System.

Respectfully,

Jon Prawdzik
Manager – Water Quality and Environmental Compliance



Pennsylvania American Water – Glen Alsace System NOV Plan of Action for Operator Training and Well Operations

The following information details the occurrence and subsequent remedial actions from a recent PA DEP routine inspection that noted groundwater wells being operated in excess of permitted maximum instantaneous pumping rates in the Glen Alsace System (PWS ID #3060088).

Incident details: During a routine on-site inspection at Pennsylvania American Water Glen Alsace Water System, Wells 8, 12A and 13 were being operated in excess of the permitted maximum instantaneous pumping rates. Pennsylvania American Water received an NOV for failing to operate the wells in a manner consistent with the PA DEP approved operating permit.

Short-term remediation: All Operators associated with well operations were provided comprehensive review and training on each well's operating permit, including maximum instantaneous flow limits and minimum chlorine residuals to maintain compliance with the Ground Water Rule and any operating permit and applicable regulation. Placards were also placed in each well, detailing permit conditions to reinforce these requirements. New Operator training will emphasize operating and permit conditions to maintain compliance.

Well 8 operation was addressed by re-spanning the flow cell to proper calibration settings to provide accurate flow data. This information was communicated previously to PA DEP. Well 8 remains in compliance with the associated operating permit. Well 12A and 13 operation was adjusted by restricting each well's gate valve so the flow will not exceed the maximum allowable amount. Since our meeting on September 10, the existing Cla-Val in Well 12A was rebuilt and is now utilized as intended to control flow. Evaluations for improvement on each well's operation and valve process are on-going.

Long-term solution: Pennsylvania American Water will continue to evaluate each well and determine a suitable plan of action based on existing well condition and continue to educate staff on any changes to well operations. Based on these evaluations, the following options will be performed:

- evaluate each well to determine whether Cla-Val or VFD motors will be utilized to control flow
- repair or replacement of current control valves to meet acceptable performance
- add SCADA alarming and well shutdowns for flows that may approach permit limits
- evaluate the possibility to amend current DEP permits to allow a higher instantaneous maximum flow rate at specific wells – DEP consolation and permitting required
- operator training on system and well operations will be conducted at a more frequent basis to ensure awareness of all permit conditions and any short or long term solutions detailed in this letter

Well operational improvements in response to the Glen Alsace NOV for exceeding the "Instantaneous Maximum Flow."

Action Item	Description	Responsible Person	Target Completion Date	Actual Completion Date
Rebuild Back Pressure Sustaining Regulating Valves	Rebuild valves to improve flow control	John Rothwell	11/30/2015	
Program Hi Flow Interlock in SCADA at each well	Flow > permitted "Instantaneous Flow Rate" for a period greater than 30 minutes will shut the well down and call out.	Branden Leaphart	4/1/2016	
Frozen alarm signals on compliance instruments	Test/Determine if frozen alarm signals exist on all compliance instruments. Set up programing schedule for missing alarms.	Jeff Chamberlain / Paul Hoffman	4/1/2016	
Evaluate the use of Variable Speed Drives on the well motor to control flows versus BPSS Valves	BPSS valves tend to drift over time and require periodic maintenance. VFD's offer ulitmate control and a higher cost and require additional programming.	Jeff Chamberlain / Paul Hoffman	4/1/2016	
Write up well flow controls			6/1/2016	
Prepare Well Improvement Budgets			6/1/2016	
Implement Well Improvements			12/31/2017	