PENNSYLVANIA
AMERICAN WATER

Brian Ardire
Director, Corporate Counsel
Pennsylvania-American Water Company
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January 10, 2019

Ms. Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Application of Pennsylvania-American Water Company–Wastewater Division for approval of the transfer, by sale, of substantially all the Borough of Turbotville's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company at Docket No. A-2018-3004189

Dear Secretary Chiavetta:

In response to your letter dated December 26, 2018, attached for e-filing are Pennsylvania-American Water Company's responses to Data Request Set 2, regarding the above referenced docket number.

Sincerely,

Brian A. Ardire

Enclosure

cc: C. McKinley
Tanya McClosky, Office of Small Business Advocate
John Evans, Office of Small Business Advocate
Richard Kanaskie, PUC Bureau of Investigation and Enforcement

Bureau of Technical Utility Services
Water/Wastewater Division
Data Request Set 2

Application of Pennsylvania-American Water Company–Wastewater Division for approval of the transfer, by sale, of substantially all the Borough of Turbotville's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company at Docket No. A-2018-3004189

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

A-33. Pennsylvania-American Water Company–Wastewater Division's (PAWC-WD) response to the Bureau of Technical Utility Services (TUS) Data Request Set 1, question A-6, states that a certified contract operator will operate the wastewater treatment plant (WWTP) and be managed by PAWC-WD.

a. Please describe any efficiencies, cost savings or other advantages this third-party arrangement would provide compared to utilizing a PAWC-WD employee to operate the system.

Response: **Since the Turbotville Wastewater Treatment Plant is very small it would not be economical to hire a full time PAW employee to operate this system. Hiring a certified contract operator would be less expensive than hiring a full time employee with benefits. As we acquire more systems in this area or if the work load in this system increases we will re-evaluate to see if hiring our own employee to run multiple systems would be more economical than using a contract operator.**

b. If utilizing a certified contract operator in lieu of a PAWC-WD employee does not provide any efficiencies, cost savings or other advantages, explain why PAWC-WD must utilize this service.

Response: **Using a contract operator to operate the Turbotville wastewater system is less expensive than hiring a full time PAW employee with benefits.**

c. Please identify if the $24,747 shown for Contracted Services on Exhibit P, provided in response to TUS Data Request Set 1, question A-28, is the cost associated with using a certified contract operator to operate the WWTP. If not please estimate a yearly cost for this service.

Response: **The $24,747 identified in Exhibit P is the estimated yearly cost to use a certified contract operator for this system.**

Responsible Witness: Joseph F. Woodward
Senior Manager, Central PA Operations

Bureau of Technical Utility Services
Water/Wastewater Division
Data Request Set 2

Application of Pennsylvania-American Water Company–Wastewater Division for approval of the transfer, by sale, of substantially all the Borough of Turbotville's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company at Docket No. A-2018-3004189

A-34. TUS Data Request Set 1, question A-9, requested an estimate of the cost PAWC-WD will incur to revise Turbotville Borough's Act 537 Plan. Provide an estimated cost and identify if this cost was included in the five-year capital plan mentioned in response to TUS Data Request Set 1, question A-11.

Response: **The work to revise the Act 537 Plan Update is being performed by PAWC personnel. The cost of the Act 537 Plan Update will consist of the cost for the time spent by PAWC personnel, estimated at approximately $9,600 and is included in the five year capital plan.**

Responsible Witness: Michael J. Guntrum
Senior Project Engineer

Bureau of Technical Utility Services
Water/Wastewater Division
Data Request Set 2

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A-35 PAWC-WD's response to TUS Data Request Set 1, question A-10, states that Turbotville Borough's recently submitted Act 537 Plan update was submitted and subsequently withdrawn. Please provide evidence of DEP's acceptance of the withdrawal.

Response: **Please see the attached letter from UNI-TEC withdrawing the Borough's application for a Water Quality Management Part II permit. It is PAWC's understanding DEP will accept the withdrawal of the Act 537 Plan Update when PAWC's Act 537 Plan Update is accepted by DEP.**

Responsible Witness: Michael J. Guntrum
Senior Project Engineer

UNI-TEC
Consulting Engineers Inc.

October 6, 2017
File No. 0047-043-000

Mr. Jeremiah Northridge, P.E.
PA Department of Environmental Protection
Northcentral Regional Office
208 West Third Street, Suite 101
Williamsport, PA 17701-6448

RE: WQM Part II Permit Application
Turbotville Wastewater Treatment Plant
Borough of Turbotville, Northumberland County

Dear Jere:

On behalf of the Borough of Turbotville, we are requesting to withdraw the Borough's application dated July 28, 2017 for a Water Quality Management Part II Permit for the upgrade of the Turbotville Wastewater Treatment Plant.

Should you have any questions or need additional information, please do not hesitate to contact me by phone or email: maa@uni-tec.com. Thank you for your assistance in this matter.

Sincerely,
UNI-TEC CONSULTING ENGINEERS, INC.

Michele A. Aukerman

Michele A. Aukerman, P.E.
Project Engineer

cc: Borough of Turbotville (via email)

Bureau of Technical Utility Services
Water/Wastewater Division
Data Request Set 2

Application of Pennsylvania-American Water Company–Wastewater Division for approval of the transfer, by sale, of substantially all the Borough of Turbotville's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company at Docket No. A-2018-3004189

A-36 The copy of Turbotville Borough's Act 537 Special Study (Special Study) filed in response to TUS Data Request Set 1, question A-10, identifies that the WWTP will be replaced at a cost of $3,900,000. If DEP does not approve an alternative plan to replacing the WWTP, please identify:

a. If PAWC-WD is prepared to move forward with the acquisition.

b. If PAWC-WD is prepared to complete the replacement/upgrades outlined in the Special Study.

c. If PAWC-WD agrees with the estimated replacement cost quantified in the Special Study.

d. If PAWC-WD does not agree with the estimated replacement cost identified in the response to TUS Data Request Set 1, question Data Request A-10, please quantify PAWC-WD's estimate to replace the WWTP as outlined in the Special Study identified above.

Response: **As per Paragraph 6.1 (f) of the Asset Purchase Agreement, PAWC has the right, in its sole and absolute discretion, to terminate the Agreement if DEP shall impose or require any changes to the PAWC's amended Act 537 Plan. PAWC will make a determination whether to exercise this right of termination once DEP's final determination of PAWC's Act 537 Plan Update is known.**

Responsible Witness: Michael J. Guntrum
Senior Project Engineer

Bureau of Technical Utility Services
Water/Wastewater Division
Data Request Set 2

Application of Pennsylvania-American Water Company–Wastewater Division for approval of the transfer, by sale, of substantially all the Borough of Turbotville's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company at Docket No. A-2018-3004189

A-37 Please verify that Turbotville Borough's WWTP is not currently receiving flow or connected to any properties in Lewis Township.

Response: **Please see attached letter from Turbotville Borough regarding customers in Lewis Township.**

Responsible Witness: Michael J. Guntrum
Senior Project Engineer

Turbotville Borough

267 Broadway Street, PO Box 264 Turbotville, PA 17772
Ph. 570-649-5476 Fax 570-649-6620
turbotville5476@windstream.net

January 4, 2019

To whom it may concern,

This letter is confirm the Turbotville Borough WWTP does not receive any flow from or have any connections from Lewis Township.

Sincerely,

Francis P. Betz
Council President
Turbotville Borough

Bureau of Technical Utility Services
Water/Wastewater Division
Data Request Set 2

Application of Pennsylvania-American Water Company–Wastewater Division for approval of the transfer, by sale, of substantially all the Borough of Turbotville's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company at Docket No. A-2018-3004189

A-38. Please identify whether or not Turbotville Borough's WWTP has been able to meet the effluent limitations that went into effect June 1, 2018, as identified in NPDES Permit No. PA0028100.

Response: **Please see the attached Electronic Discharge Monitoring Report (eDMR) for the Turbotville WWTP for June 2018 through November 2018. According to the eDMR data, the Turbotville WWTP had exceedances for CBOD5 and Fecal Coliform in its July 2018 eDMR report and 4 exceedances for ammonia nitrogen in their August 2018 eDMR report. PAWC anticipates once the recommended alternative in PAWC's Update to the Act 537 Plan is implemented the Turbotville WWTP will be able to meet its permitted effluent limits.**

Responsible Witness: Michael J. Guntrum
Senior Project Engineer

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

National Pollutant Discharge Elimination System (NPDES)
Electronic Discharge Monitoring Report (eDMR)

1/8/2019 10:07:14 AM

Region: All
County: All
Municipality: 49929 - Turbotville Boro
Permit #: All
Monitoring Period Date Range: 6/1/2018 To 12/1/2018
Client: All
Parameter: All

Permit #:	**PA0028100**	Facility Address:	**TURBOTVILLE WWTP 2 ADAM ST TURBOTVILLE, PA 17772-9069**
Client ID / Name:	**80193 - TURBOTVILLE BORO NORTHUMBERLAND CNTY**		
Primary Facility ID / Name:	**256655 - TURBOTVILLE WWTP**	County:	**Northumberland**
Major Facility:	**No**	Municipality:	**Turbotville Boro**
Region:	**NCRO**	Latitude / Longitude:	**41.106389 / -76.771944**

Monitoring Period Begin Date	Monitoring Period End Date	DMR Received Date	Outfall	Discharge	Monitoring Location	Parameter Name	Parameter Code	DMR Value	Permit Limit	Units	Statistical Base Code
06/01/2018	06/30/2018	07/16/2018	001	Yes	Final Effluent	Ammonia-Nitrogen	00610	< 1.0	3.5	mg/L	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	< 0.2	4.0	lbs/day	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	1.0	5.0	mg/L	Weekly Average
					Final Effluent	Ammonia-Nitrogen	00610	0.3	5.5	lbs/day	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	2	13	lbs/day	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	5	12	mg/L	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	10	18	mg/L	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	4	20	lbs/day	Weekly Average
					Final Effluent	Copper, Total	01042	< 0.005	36.31	ug/L	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.002	0.04	lbs/day	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.005	72.62	ug/L	Daily Maximum
					Final Effluent	Copper, Total	01042	< 0.002	0.08	lbs/day	Daily Maximum

06/01/2018	06/30/2018	07/16/2018	001	Yes	Final Effluent	Dissolved Oxygen	00300	3.2	Monitor and Report	mg/L	Minimum
					Final Effluent	Fecal Coliform	74055	4	200	CFU/100 ml	Geometric Mean
					Final Effluent	Fecal Coliform	74055	12	1000	CFU/100 ml	Instantaneous Maximum
					Final Effluent	Flow	50050	0.043	Monitor and Report	MGD	Average Monthly
					Final Effluent	Flow	50050	0.096	Monitor and Report	MGD	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.02	Monitor and Report	lbs/day	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.02	Monitor and Report	lbs/day	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Daily Maximum
					Final Effluent	pH	00400	7.4	9.0	S.U.	Maximum
					Final Effluent	pH	00400	7.0	6.0	S.U.	Minimum
					Final Effluent	Total Phosphorus	00665	< 0.14	2.60	mg/L	Average Monthly
					Final Effluent	Total Phosphorus	00665	< 0.04	2.96	lbs/day	Average Monthly
					Final Effluent	Total Phosphorus	00665	< 0.25	2.60	mg/L	Weekly Average
					Final Effluent	Total Phosphorus	00665	< 0.09	2.96	lbs/day	Weekly Average
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.26	0.45	mg/L	Average Monthly
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.56	1.48	mg/L	Instantaneous Maximum
					Final Effluent	Total Suspended Solids	00530	< 1	34	lbs/day	Average Monthly
					Final Effluent	Total Suspended Solids	00530	< 5	30	mg/L	Average Monthly
					Final Effluent	Total Suspended Solids	00530	2	34	lbs/day	Weekly Average
					Final Effluent	Total Suspended Solids	00530	5	30	mg/L	Weekly Average
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	171	Monitor and Report	mg/L	Average Monthly

06/01/2018	06/30/2018	07/16/2018	001	Yes	Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	47	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	57	Monitor and Report	lbs/day	Daily Maximum
					Raw Sewage Influent	Total Suspended Solids	00530	49	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	178	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	65	Monitor and Report	lbs/day	Daily Maximum
07/01/2018	07/31/2018	08/23/2018	001	Yes	Final Effluent	Ammonia-Nitrogen	00610	2.0	3.5	mg/L	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	1.0	4.0	lbs/day	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	2.0	5.5	lbs/day	Weekly Average
					Final Effluent	Ammonia-Nitrogen	00610	3.0	5.0	mg/L	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 6	13	lbs/day	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 5	12	mg/L	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	22	20	lbs/day	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	8	18	mg/L	Weekly Average
					Final Effluent	Copper, Total	01042	< 0.005	36.31	ug/L	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.0009	0.04	lbs/day	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.005	72.62	ug/L	Daily Maximum
					Final Effluent	Copper, Total	01042	< 0.0009	0.08	lbs/day	Daily Maximum
					Final Effluent	Dissolved Oxygen	00300	3.2	Monitor and Report	mg/L	Minimum
					Final Effluent	Fecal Coliform	74055	< 7	200	CFU/100 ml	Geometric Mean
					Final Effluent	Fecal Coliform	74055	> 2420	1000	CFU/100 ml	Instantaneous Maximum
					Final Effluent	Flow	50050	0.085	Monitor and Report	MGD	Average Monthly

07/01/2018	07/31/2018	08/23/2018	001	Yes	Final Effluent	Flow	50050	0.33	Monitor and Report	MGD	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.009	Monitor and Report	lbs/day	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.009	Monitor and Report	lbs/day	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Daily Maximum
					Final Effluent	pH	00400	7.3	9.0	S.U.	Maximum
					Final Effluent	pH	00400	7.0	6.0	S.U.	Minimum
					Final Effluent	Total Phosphorus	00665	< 0.158	2.60	mg/L	Average Monthly
					Final Effluent	Total Phosphorus	00665	< 0.30	2.96	lbs/day	Average Monthly
					Final Effluent	Total Phosphorus	00665	0.455	2.60	mg/L	Weekly Average
					Final Effluent	Total Phosphorus	00665	1.00	2.96	lbs/day	Weekly Average
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.28	0.45	mg/L	Average Monthly
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.70	1.48	mg/L	Instantaneous Maximum
					Final Effluent	Total Suspended Solids	00530	< 6	30	mg/L	Average Monthly
					Final Effluent	Total Suspended Solids	00530	< 8	34	lbs/day	Average Monthly
					Final Effluent	Total Suspended Solids	00530	10	30	mg/L	Weekly Average
					Final Effluent	Total Suspended Solids	00530	27	34	lbs/day	Weekly Average
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	139	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	61	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	115	Monitor and Report	lbs/day	Daily Maximum
					Raw Sewage Influent	Total Suspended Solids	00530	45	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	89	Monitor and Report	mg/L	Average Monthly

07/01/2018	07/31/2018	08/23/2018	001	Yes	Raw Sewage Influent	Total Suspended Solids	00530	100	Monitor and Report	lbs/day	Daily Maximum
08/01/2018	08/31/2018	09/24/2018	001	Yes	Final Effluent	Ammonia-Nitrogen	00610	4.0	3.5	mg/L	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	5.0	4.0	lbs/day	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	6.0	5.0	mg/L	Weekly Average
					Final Effluent	Ammonia-Nitrogen	00610	9.0	5.5	lbs/day	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	6	12	mg/L	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	7	13	lbs/day	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	10	18	mg/L	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	16	20	lbs/day	Weekly Average
					Final Effluent	Copper, Total	01042	< 0.005	36.31	ug/L	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.005	0.04	lbs/day	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.005	72.62	ug/L	Daily Maximum
					Final Effluent	Copper, Total	01042	< 0.005	0.08	lbs/day	Daily Maximum
					Final Effluent	Dissolved Oxygen	00300	3.1	Monitor and Report	mg/L	Minimum
					Final Effluent	Fecal Coliform	74055	< 2	200	CFU/100 ml	Geometric Mean
					Final Effluent	Fecal Coliform	74055	14	1000	CFU/100 ml	Instantaneous Maximum
					Final Effluent	Flow	50050	0.121	Monitor and Report	MGD	Average Monthly
					Final Effluent	Flow	50050	0.309	Monitor and Report	MGD	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	lbs/day	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	lbs/day	Daily Maximum

08/01/2018	08/31/2018	09/24/2018	001	Yes	Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Daily Maximum
					Final Effluent	pH	00400	7.4	9.0	S.U.	Maximum
					Final Effluent	pH	00400	7.0	6.0	S.U.	Minimum
					Final Effluent	Total Phosphorus	00665	0.267	2.60	mg/L	Average Monthly
					Final Effluent	Total Phosphorus	00665	< 0.40	2.96	lbs/day	Average Monthly
					Final Effluent	Total Phosphorus	00665	0.757	2.60	mg/L	Weekly Average
					Final Effluent	Total Phosphorus	00665	1.00	2.96	lbs/day	Weekly Average
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.24	0.45	mg/L	Average Monthly
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.87	1.48	mg/L	Instantaneous Maximum
					Final Effluent	Total Suspended Solids	00530	< 8	34	lbs/day	Average Monthly
					Final Effluent	Total Suspended Solids	00530	< 7	30	mg/L	Average Monthly
					Final Effluent	Total Suspended Solids	00530	21	34	lbs/day	Weekly Average
					Final Effluent	Total Suspended Solids	00530	13	30	mg/L	Weekly Average
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	66	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	50	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	84	Monitor and Report	lbs/day	Daily Maximum
					Raw Sewage Influent	Total Suspended Solids	00530	60	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	77	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	95	Monitor and Report	lbs/day	Daily Maximum
09/01/2018	09/30/2018	10/16/2018	001	Yes	Final Effluent	Ammonia-Nitrogen	00610	2.0	3.5	mg/L	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	2.0	4.0	lbs/day	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	2.0	5.5	lbs/day	Weekly Average
					Final Effluent	Ammonia-Nitrogen	00610	3.0	5.0	mg/L	Weekly Average

09/01/2018	09/30/2018	10/16/2018	001	Yes	Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 6	13	lbs/day	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 5	12	mg/L	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	12	20	lbs/day	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	8	18	mg/L	Weekly Average
					Final Effluent	Copper, Total	01042	< 0.005	36.31	ug/L	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.002	0.04	lbs/day	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.005	72.62	ug/L	Daily Maximum
					Final Effluent	Copper, Total	01042	< 0.002	0.08	lbs/day	Daily Maximum
					Final Effluent	Dissolved Oxygen	00300	2.6	Monitor and Report	mg/L	Minimum
					Final Effluent	Fecal Coliform	74055	< 3	200	CFU/100 ml	Geometric Mean
					Final Effluent	Fecal Coliform	74055	5	1000	CFU/100 ml	Instantaneous Maximum
					Final Effluent	Flow	50050	0.128	Monitor and Report	MGD	Average Monthly
					Final Effluent	Flow	50050	0.263	Monitor and Report	MGD	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.02	Monitor and Report	lbs/day	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.02	Monitor and Report	lbs/day	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Daily Maximum
					Final Effluent	pH	00400	7.4	9.0	S.U.	Maximum
					Final Effluent	pH	00400	7.0	6.0	S.U.	Minimum
					Final Effluent	Total Phosphorus	00665	0.50	2.96	lbs/day	Average Monthly
					Final Effluent	Total Phosphorus	00665	0.422	2.60	mg/L	Average Monthly
					Final Effluent	Total Phosphorus	00665	2.00	2.96	lbs/day	Weekly Average

09/01/2018	09/30/2018	10/16/2018	001	Yes	Final Effluent	Total Phosphorus	00665	1.06	2.60	mg/L	Weekly Average
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.29	0.45	mg/L	Average Monthly
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.80	1.48	mg/L	Instantaneous Maximum
					Final Effluent	Total Suspended Solids	00530	< 5	34	lbs/day	Average Monthly
					Final Effluent	Total Suspended Solids	00530	< 5	30	mg/L	Average Monthly
					Final Effluent	Total Suspended Solids	00530	5	30	mg/L	Weekly Average
					Final Effluent	Total Suspended Solids	00530	7	34	lbs/day	Weekly Average
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	42	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	60	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	63	Monitor and Report	lbs/day	Daily Maximum
					Raw Sewage Influent	Total Suspended Solids	00530	53	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	39	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	52	Monitor and Report	lbs/day	Daily Maximum
10/01/2018	10/31/2018	11/17/2018	001	Yes	Final Effluent	Ammonia-Nitrogen	00610	< 1.0	3.5	mg/L	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	< 0.5	4.0	lbs/day	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	0.9	5.5	lbs/day	Weekly Average
					Final Effluent	Ammonia-Nitrogen	00610	1.0	5.0	mg/L	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 2	13	lbs/day	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 3	12	mg/L	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	3	18	mg/L	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	2	20	lbs/day	Weekly Average
					Final Effluent	Copper, Total	01042	< 0.004	0.04	lbs/day	Average Monthly

10/01/2018	10/31/2018	11/17/2018	001	Yes	Final Effluent	Copper, Total	01042	< 0.005	36.31	ug/L	Average Monthly
					Final Effluent	Copper, Total	01042	< 0.004	0.08	lbs/day	Daily Maximum
					Final Effluent	Copper, Total	01042	< 0.005	72.62	ug/L	Daily Maximum
					Final Effluent	Dissolved Oxygen	00300	3.1	Monitor and Report	mg/L	Minimum
					Final Effluent	Fecal Coliform	74055	< 1	2000	CFU/100 ml	Geometric Mean
					Final Effluent	Fecal Coliform	74055	2	10000	CFU/100 ml	Instantaneous Maximum
					Final Effluent	Flow	50050	0.08	Monitor and Report	MGD	Average Monthly
					Final Effluent	Flow	50050	0.212	Monitor and Report	MGD	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.04	Monitor and Report	lbs/day	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.04	Monitor and Report	lbs/day	Daily Maximum
					Final Effluent	pH	00400	7.4	9.0	S.U.	Maximum
					Final Effluent	pH	00400	7.2	6.0	S.U.	Minimum
					Final Effluent	Total Phosphorus	00665	0.20	2.96	lbs/day	Average Monthly
					Final Effluent	Total Phosphorus	00665	0.288	2.60	mg/L	Average Monthly
					Final Effluent	Total Phosphorus	00665	0.472	2.60	mg/L	Weekly Average
					Final Effluent	Total Phosphorus	00665	0.30	2.96	lbs/day	Weekly Average
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.29	0.45	mg/L	Average Monthly
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.59	1.48	mg/L	Instantaneous Maximum
					Final Effluent	Total Suspended Solids	00530	< 3	34	lbs/day	Average Monthly
					Final Effluent	Total Suspended Solids	00530	< 5	30	mg/L	Average Monthly
					Final Effluent	Total Suspended Solids	00530	< 5	30	mg/L	Weekly Average

10/01/2018	10/31/2018	11/17/2018	001	Yes	Final Effluent	Total Suspended Solids	00530	< 4	34	lbs/day	Weekly Average
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	144	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	84	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	140	Monitor and Report	lbs/day	Daily Maximum
					Raw Sewage Influent	Total Suspended Solids	00530	123	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	69	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	135	Monitor and Report	lbs/day	Daily Maximum
11/01/2018	11/30/2018	12/13/2018	001	Yes	Final Effluent	Ammonia-Nitrogen	00610	3.0	11.5	lbs/day	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	2.0	10.5	mg/L	Average Monthly
					Final Effluent	Ammonia-Nitrogen	00610	4.0	17	lbs/day	Weekly Average
					Final Effluent	Ammonia-Nitrogen	00610	2.0	15.0	mg/L	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 4	12	mg/L	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	< 5	13	lbs/day	Average Monthly
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	5	18	mg/L	Weekly Average
					Final Effluent	Carbonaceous Biochemical Oxygen Demand (CBOD5)	80082	7	20	lbs/day	Weekly Average
					Final Effluent	Copper, Total	01042	0.006	0.04	lbs/day	Average Monthly
					Final Effluent	Copper, Total	01042	0.0056	36.31	ug/L	Average Monthly
					Final Effluent	Copper, Total	01042	0.006	0.08	lbs/day	Daily Maximum
					Final Effluent	Copper, Total	01042	0.0056	72.62	ug/L	Daily Maximum
					Final Effluent	Dissolved Oxygen	00300	3.1	Monitor and Report	mg/L	Minimum
					Final Effluent	Fecal Coliform	74055	< 2	2000	CFU/100 ml	Geometric Mean
					Final Effluent	Fecal Coliform	74055	4	10000	CFU/100 ml	Instantaneous Maximum

11/01/2018	11/30/2018	12/13/2018	001	Yes	Final Effluent	Flow	50050	0.15	Monitor and Report	MGD	Average Monthly
					Final Effluent	Flow	50050	0.23	Monitor and Report	MGD	Daily Maximum
					Final Effluent	Lead, Total	01051	0.06	Monitor and Report	lbs/day	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Average Monthly
					Final Effluent	Lead, Total	01051	< 0.05	Monitor and Report	mg/L	Daily Maximum
					Final Effluent	Lead, Total	01051	< 0.06	Monitor and Report	lbs/day	Daily Maximum
					Final Effluent	pH	00400	7.4	9.0	S.U.	Maximum
					Final Effluent	pH	00400	7.1	6.0	S.U.	Minimum
					Final Effluent	Total Phosphorus	00665	0.45	2.60	mg/L	Average Monthly
					Final Effluent	Total Phosphorus	00665	0.60	2.96	lbs/day	Average Monthly
					Final Effluent	Total Phosphorus	00665	1.00	2.96	lbs/day	Weekly Average
					Final Effluent	Total Phosphorus	00665	0.67	2.60	mg/L	Weekly Average
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.27	0.45	mg/L	Average Monthly
					Final Effluent	Total Residual Chlorine (TRC)	50060	0.72	1.48	mg/L	Instantaneous Maximum
					Final Effluent	Total Suspended Solids	00530	< 7	30	mg/L	Average Monthly
					Final Effluent	Total Suspended Solids	00530	< 9	34	lbs/day	Average Monthly
					Final Effluent	Total Suspended Solids	00530	9	30	mg/L	Weekly Average
					Final Effluent	Total Suspended Solids	00530	14	34	lbs/day	Weekly Average
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	61	Monitor and Report	lbs/day	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	45	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Biochemical Oxygen Demand (BOD5)	00310	75	Monitor and Report	lbs/day	Daily Maximum
					Raw Sewage Influent	Total Suspended Solids	00530	39	Monitor and Report	lbs/day	Average Monthly

11/01/2018	11/30/2018	12/13/2018	001	Yes	Raw Sewage Influent	Total Suspended Solids	00530	30	Monitor and Report	mg/L	Average Monthly
					Raw Sewage Influent	Total Suspended Solids	00530	42	Monitor and Report	lbs/day	Daily Maximum

VERIFICATION

I, JOSEPH F. WOODWARD, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. Cons. Stat. § 4904 (relating to unsworn falsification to authorities).

Joseph F. Woodward
Senior Manager - Operations

Date: 1-7-19

VERIFICATION

I, MICHAEL J. GUNTRUM, hereby state that the facts above set forth above are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.

Michael J. Guntrum, P.E., PMP
Senior Project Engineer

Dated: 1-10-2019