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File #: 180048

May 19, 2020

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: In the Matter of the Application of The York Water Company, Under Sections 507, 1102(a)(1) and 1102(a)(3) of the Public Utility Code, for approval of the right of The York Water Company to (1) enter into a municipal contract to acquire certain public wastewater facilities from Letterkenny Township Municipal Authority; and (2) begin to offer or furnish wastewater service to the public in a portion of Letterkenny Township, Franklin County, Pennsylvania
Docket No. A-2020-3019424

Dear Secretary Chiavetta:

Attached for filing on behalf of The York Water Company are the Responses to the Data Requests of the Bureau of Technical Utility Services, Set I, in the above-referenced proceeding.

Respectfully submitted,

Devin Ryan

DR/kls
Attachments

cc: Clinton McKinley (*w/enc., via E-mail cmckinley@pa.gov*)

Application of The York Water Company - Wastewater to Acquire the Letterkenny Township Municipal Authority Wastewater System at Docket No. A-2020-3019424

DISCOVERY A-1

The York Water Company – Wastewater's (York-WW's) tentative journal entries for booking the purchase of Letterkenny Township Municipal Authority's (LTMA's) wastewater system, provided in the Application's Section 8, Page 12, use Account No. 105 – Construction Work in Progress. Please explain why Account No. 105 is used instead of Account No. 104 – Utility Plant Purchased or Sold and whether using Account No. 105 to record the purchase of the LTMA system is in conformance with the National Association of Regulatory Utility Commissioners Uniform System of Accounts applicable to York-WW.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

The Company has historically recorded acquisition costs in Account No. 105 – Construction Work in Progress until after Closing.

York Water's external auditors have approved our accounting method, and it complies with the National Association of Regulatory Utility Commissioners ("NARUC") Uniform System of Accounts applicable to York Water.

DISCOVERY A-2

The Application's Exhibit T-2 indicates the LTMA wastewater system contains an integrated septic tank effluent gravity (STEG) system comprised of 25 effluent pumps and septic tanks in Part 3, Page 3 of the copy of the document titled "Act 537 Plan Update, Letterkenny Township, Franklin County, Pennsylvania" dated October 3, 2019 (2019 Special Study). Please provide the following information:

a. The capacity (in gallons), dimensions and year of installation for each tank;

b. The horsepower, rate of discharge (in gallons per minute) and year of installation for the effluent pump in each tank;

c. A description of who will be responsible for operation, maintenance and replacement responsibilities for the effluent pump in each tank, including whether customers will be financially responsible for electricity needed to operate the effluent pumps and how these responsibilities compare with York-WW wastewater tariff responsibilities for customers with grinder pumps;

d. A five-year maintenance and inspection history for each tank (e.g., descriptions of sludge removal frequency, repairs and visual or other integrity testing);

e. Confirmation that each tank is located within the public right-of-way. If not, provide a complete list of recorded easements dedicated to LTMA for all tanks to be transferred to York-WW at closing; and

f. York-WW's plan to maintain the STEG system as an integral component of the wastewater system for the next five (5) years or to modify the wastewater system to eliminate the need for these tanks.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

a. A table of information related to the STEG tanks, including location and capacity, is attached as Attachment A-2a. Based on a review of the available records and easement documents, the original tanks were installed in 1992. The installation year for any tanks installed after 1992 is not available.

b. The effluent from the septic tanks is conveyed via gravity to the small diameter sewer servicing the properties. While York Water was not the author of the Application's Exhibit T-2, the reference to pumps located in the STEG system appears to refer to owner-side grinder pumps that transfer household sewage to the septic tank. York Water does not have the requested information on the owner-side pumps.

c. Any pumps that deliver household wastewater to the septic (STEG) tanks are the responsibility of the homeowner to own and operate, including being financially responsible for the electricity necessary to operate the pumps.

d. Attachment A-2a summarizes pump-outs/cleaning conducted since 2014. Limited information is available from the Authority on the operations and maintenance of the STEG septic tanks. The Authority has no information available regarding visual inspections or maintenance of the tanks.

e. The tanks are in recorded easements. A list of easements associated with the Mountain Road STEG system is provided in Attachment A-2e.

f. York Water's plan is to operate the STEG system as designed and to evaluate the operational performance of the current system.

LETTERKENNY TOWNSHIP MUNICIPAL AUTHORITY - STEG SYSTEM INFORMATION

						Maintenance Pumpout History		
Address	Reference # on Map A-14	Number of Tanks	Installation Year	Volume of tanks	Notes	Rosen Septic	C&W Septic	C&W Septic
12983 Mountain Rd	21	1	1992	500		May-14		Apr-19
13000 Mountain Rd	20	1	1992	500			Aug-17	
13005 Mountain Rd	19	1	1992	500	Located on Reed Property easement	May-15	Aug-17	
13011 Mountain Rd	18	2	1992 (1), Unknown(1)	500 each	2 Tanks - previously had frequent issue	May-15	Mar-16	
13035 Mountain Rd	16	1	1992	500			Aug-17	
13047 Mountain Rd	15	0			Shared tank 15		Aug-17	
13055 Mountain Rd	15	1	1992	500	Shared tank 15		Aug-17	
13062 Mountain Rd	17	2	1992 (1), Unknown(1)	500 each	2 Tanks - unknown why there are 2 tanks. (also has grinder pump at house)		Aug-17	
13099 Mountain Rd	14	1	1992	500			Aug-17	
14053 Mountain Rd	12	1	1992	500		Dec-14		Apr-19
14140 Mountain Rd	13	1	1992	500				Apr-19
14149 Mountain Rd	10A	1	1992	500		Dec-14	Aug-17	
14151 Mountain Rd	8	0	N/A		Shared Tank 8	Dec-14	Aug-17	
14172 Mountain Rd	10	1	1992	500		Dec-14	Aug-17	
14173 Mountain Rd	8	1	1992	1500	3 Homes on 1 Tank	Oct-15	Aug-17	
14222 Mountain Rd	9	1	1992	500		Dec-14	Aug-17	
14242 Mountain Rd	7	1	1992	500		Dec-14	Aug-17	Dec-18
14268 Mountain Rd	6	1	1992	500		Dec-14	Aug-17	
14275 Mountain Rd	----	0	Removed	----	Two (2) tanks removed Sept 2017		Jul-16	Sep-17
14290 Mountain Rd	5A	1	Unknown	500	Home constructed post-original system	Dec-14	Aug-17	Sep-18
14306 Mountain Rd	5	1	1992	500		Dec-14	Aug-17	
14342 Mountain Rd	4	1	1992	500			Aug-17	
14362 Mountain Rd	3	1	1992	500		Mar-14	Aug-17	
14374 Mountain Rd	2	1	1992	500		Mar-14	Aug-17	
14403 Mountain Rd	1	1	1992	1000			Aug-17	

Mountain Road STEG System Easement List – by Address

Easement on 0 Mountain Rd (#11)
Easement on 12583 Mountain Rd
Easement on 13000 Mountain Rd Parcel 1
Easement on 13000 Mountain Rd Parcel 2
Easement on 13011 Mountain Rd
Easement on 13035 Mountain Rd
Easement on 13055 Mountain Rd
Easement on 13062 Mountain Rd
Easement on 13055 Mountain Rd
Easement on 14053 Mountain Rd
Easement on 14140 Mountain Rd
Easement on 14145 Mountain Rd
Easement on 14151 Mountain Rd
Easement on 14172 Mountain Rd
Easement on 14173 Mountain Rd
Easement on 14222 Mountain Rd
Easement on 14242 Mountain Rd
Easement on 14268 Mountain Rd
Easement on 14250 Mountain Rd
Easement on 14306 Mountain Rd
Easement on 14342 Mountain Rd
Easement on 14362 Mountain Rd
Easement on 14374 Mountain Rd
Easement on 14354 Mountain Rd Parcel 1
Easement on 14354 Mountain Rd Parcel 2
Easement on Roxbury Holiness Camp - Mountain Rd

DISCOVERY A-3

Section 2, Paragraph B of LTMA's 1981-1 Resolution, provided in the Application's Exhibit F-3, established volumetric rates for non-residential wastewater customers. Regarding these rates, please either:

a. Provide evidence LTMA has amended or eliminated these rates by a subsequent resolution;

b. Explain why York-WW is not proposing to adopt these rates; or

c. Revise York-WW's *pro forma* tariff supplement, provided as the Application's Exhibit P, to reflect the effective LTMA volumetric rates for non-residential wastewater customers.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

a. The rates set forth in Letterkenny Township Municipal Authority's ("LTMA") 1981-1 Resolution were superseded by Resolution 2018-1, which was attached to the Application as Exhibit R.

b. York Water has proposed to adopt LTMA's currently-effective rates, not the old rates set forth in LTMA's 1981-1 Resolution.

c. This is not applicable for the reasons explained previously in subparts (a) and (b).

DISCOVERY A-4

Section 2, Paragraph C of LTMA's 1981-1 Resolution, provided in the Application's Exhibit F-3, states that LTMA may require the owner of a commercial establishment, an industrial establishment, or an institutional establishment, to install, pay for and to maintain a meter for measuring monthly volumes discharged to the sewer system. Please quantify the number of customer-owned meters currently used by LTMA for wastewater billing.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

There are no customer-owned meters currently used by LTMA for wastewater billing.

DISCOVERY A-5

If York-WW will rely on customer-owned meters for wastewater billing after closing, please describe how this condition would comply with York-WW's effective tariff.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

Not applicable. See Discovery A-4.

DISCOVERY A-6

Section 2, Paragraph D of LTMA Resolution 1981-1, provided in the Application's Exhibit F-3, refers to a strength of waste surcharge for commercial, industrial and institutional establishments pursuant to an agreement between Hamilton Township and the Borough of Chambersburg, dated August 17, 1970, with respect to sewage transportation, treatment and disposal services to be provided by the Borough of Chambersburg to Hamilton Township and LTMA. Please confirm whether any LTMA customer is subject to a strength of waste surcharge.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

No LTMA customer is subject to a strength of waste surcharge. The strength of waste surcharge was related to an Agreement between Hamilton Township and the Borough of Chambersburg dated August 17, 1970, regarding sewage transportation, treatment, and disposal services provided by the Borough of Chambersburg to Hamilton Township and LTMA for the Kensington Heights sewer system. From the system's construction in the early 1980's until the late 1990's, the Kensington Heights sewer system was owned and operated by LTMA. However, the system is now owned and operated by Hamilton Township. After the transfer of the Kensington Heights sewer system to Hamilton Township, LTMA no longer needed to impose the strength of waste surcharge.

DISCOVERY A-7

If any LTMA customer is subject to a strength of waste surcharge, please address the following:

a. Provide a copy of the resolution establishing LTMA's current strength of waste surcharge;

b. Explain how LTMA's strength of waste surcharge will change after closing; and

c. Revise York-WW's *pro forma* tariff supplement, provided in the Application's Exhibit P, to reflect the effective strength of waste surcharge rates for non-residential wastewater customers.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

Not applicable. See Discovery A-6.

DISCOVERY A-8

The Application's Exhibit I contains a copy of the Agreement of Wastewater Collection System Sale (Agreement) between LTMA and York-WW dated June 25, 2019. The Agreement's Section 3 references an Appendix A.1 and the Agreement's Section 9.1 references an Appendix B. However, the Agreement is missing both Appendices A.1 and B. Please provide copies of the Agreement's Appendices A.1 and B.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

Appendix A.1 is attached hereto as Attachment A-8a. Following execution of the Asset Purchase Agreement, the Company determined through a review of the Authority's records that there are four reserved capacity agreements in effect with the Authority (See Discovery A-9).

Appendix B of the Asset Purchase Agreement is attached hereto as Attachment A-8. The Authority's currently-effective rates are shown in Exhibit R to the Application.

APPENDIX B – RATES

Authority's Current Quarterly Rate

$135 per Connection

York Water's Projected (Prorated) Monthly Rate

$45 per Connection

Appendix A.1 – Letterkenny Township Municipal Authority

List of Reserved Capacity Agreements

Address	Connection		Date
11376 Skyline Dr.	1 EDU	262.5 gpd	9/18/2018
11378 Skyline Dr.	1 EDU	262.5 gpd	9/19/2018
11380 Skyline Dr.	1 EDU	262.5 gpd	9/19/2018
11388 Skyline Dr.	1 EDU	262.5 gpd	9/19/2018

DISCOVERY A-9

Section 3 of the Agreement in the Application's Exhibit I indicates LTMA may have entered into reservation of capacity agreements (Reserved Capacity Agreements). Please quantify the amount of LTMA system capacity that has been reserved by entities that have not yet connected to LTMA's system.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

There are four current Reserved Capacity Agreements, memorialized in Sewer Permit Forms, attached hereto as Attachment A-9. 1,050 GPD of capacity is reserved and not yet connected.

LETTERKENNY TOWNSHIP MUNICIPAL AUTHORITY

SEWER PERMIT NO. 4-18

NAME ~~Z&E CONSTRUCTION~~

ADDRESS ~~11264 OTTERBEIN SCHOOL ROAD~~ NEWBURG, PA 17240

PHONE

PROPERTY SERVED Skyline Lot 2 11376 Skyline Dr.

TOWNSHIP

COUNTY

PLANS FOR CONNECTION OF: ☐ SINGLE DOMESTIC ☐ MULTIPLE DOMESTIC ☐ OTHER

NOTE: RESIDENTS OF WELLS MUST BE 50FT FROM EXISTING OR PROPOSED SEWER LINES PER DEP REQUIREMENT. FAILURE TO COMPLY WITH THIS REQUIREMENT MAY REQUIRE RE-INSTALLATION OF YOUR PRESENT SEWER LINES

CONNECTION TO LINE OWNED BY: ☐ L.T.M.A. ☐

CAPACITY IMPACT & FEES:

OF SERVICE LATERAL CONNECTIONS (from mainline to r/w) ____ ①

OF BUILDING SEWER LINES (from r/w to building) ____ ②

OF DWELLING UNITS ____ ③A

OR

GALLONS OF ESTIMATED SEWAGE FLOW ÷ 262.5 ____ ③B

CONNECTION FEE

____ ① x actual cost = ____

CUSTOMER FACILITIES FEE

Admin ② x $75.00 = 75.00

TAPPING FEE

1 ③A OR ③B x $3,500.00 = 3,500.00

TOTAL FEE = $3,575.00 pd V#2138

DISCHARGE TO: ☐ EXISTING SEWER, BETWEEN M.H.# ____ & M.H.# ____

☐ PROPOSED EXTENSION BEGINNING AT M.H. ____ SIZE OF MAIN ____" LENGTH ____'

PROJECT LOCATION:

CONTRACT NO. ____ SHEET NO. ____ HOUSE NO. ____

AFFECTED PUMPING STATION ____ METER STATION ____

THIS PERMIT SUBJECT TO THE FOLLOWING CONDITIONS:

1. ALL CONSTRUCTION, OPERATIONS, PROCEDURES, AND DISCHARGE SHALL BE IN ACCORDANCE WITH L.T.M.A. RULES AND REGULATIONS.
2. NO PART OF THE INSTALLATION SHALL BE COVERED UNTIL INSPECTED AND APPROVED BY L.T.M.A.
3. ISSUANCE OF PERMIT SHALL NOT RELIEVE APPLICANT OF ANY RESPONSIBILITY UNDER ANY OTHER MUNICIPAL, STATE, OR FEDERAL LAW OR REQUIREMENT.

DATE OF ISSUANCE 9-19-18 BY Melissa W Kilbe

APPROVAL TO COVER ____ BY ____

LETTERKENNY TOWNSHIP MUNICIPAL AUTHORITY

SEWER PERMIT NO. 3-18

NAME _____

ADDRESS Z&E CONSTRUCTION
~~11264 OTTERBEIN SCHOOL ROAD~~
~~NEWBURG, PA 17240~~

PHONE _____

PROPERTY SERVED Lot # 1
✓ 11388 Skyline Dr.

TOWNSHIP Letterkenny

COUNTY Franklin

PLANS FOR CONNECTION OF:

☑ SINGLE DOMESTIC
☐ MULTIPLE DOMESTIC
☐ OTHER

NOTE: RESIDENTS OF WELLS MUST BE 50FT FROM EXISTING OR PROPOSED SEWER LINES PER DEP REQUIREMENT. FAILURE TO COMPLY WITH THIS REQUIREMENT MAY REQUIRE RE-INSTALLATION OF YOUR PRESENT SEWER LINES

CONNECTION TO LINE OWNED BY:

☑ L.T.M.A. ☐ _____

CAPACITY IMPACT & FEES:

OF SERVICE LATERAL CONNECTIONS (from mainline to r/w) _____ ①

OF BUILDING SEWER LINES (from r/w to building) _____ ②

OF DWELLING UNITS _____ ③A

OR

GALLONS OF ESTIMATED SEWAGE FLOW ÷ 262.5 _____ ③B

CONNECTION FEE

_____ ① x actual cost = _____

CUSTOMER FACILITIES FEE

Admin ② x $75.00 = 75.00

TAPPING FEE

1 ③A OR ③B x $3,500.00 = 3,500.00

TOTAL FEE = $ 3,575.00 pd
V# 2138

DISCHARGE TO:

☐ EXISTING SEWER, BETWEEN M.H.# _____ & M.H.# _____

☐ PROPOSED EXTENSION BEGINNING AT M.H. _____ SIZE OF MAIN _____" LENGTH _____'

PROJECT LOCATION:

CONTRACT NO. _____ SHEET NO. _____ HOUSE NO. _____

AFFECTED PUMPING STATION _____ METER STATION _____

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DATE OF ISSUANCE 9-19-18 BY Melissa W Kibler

APPROVAL TO COVER _____ BY _____

LETTERKENNY TOWNSHIP MUNICIPAL AUTHORITY

SEWER PERMIT NO. S-18

NAME _____

ADDRESS Z&E CONSTRUCTION
11264 OTTERBEIN SCHOOL ROAD
NEWBURG, PA 17240

PHONE _____

PROPERTY SERVED Skyline Lot 3
11378 Skyline Dr

TOWNSHIP _____

COUNTY _____

PLANS FOR CONNECTION OF:

☐ SINGLE DOMESTIC
☐ MULTIPLE DOMESTIC
☐ OTHER

NOTE: RESIDENTS OF WELLS MUST BE 50FT FROM EXISTING OR PROPOSED SEWER LINES PER DEP REQUIREMENT. FAILURE TO COMPLY WITH THIS REQUIREMENT MAY REQUIRE RE-INSTALLATION OF YOUR PRESENT SEWER LINES

CONNECTION TO LINE OWNED BY:

☐ L.T.M.A. ☐ _____

CAPACITY IMPACT & FEES:

OF SERVICE LATERAL CONNECTIONS (from mainline to r/w) _____ ①

OF BUILDING SEWER LINES (from r/w to building) _____ ②

OF DWELLING UNITS _____ ③A

OR

GALLONS OF ESTIMATED SEWAGE FLOW ÷ 262.5 _____ ③B

CONNECTION FEE

_____ ① x actual cost = _____

CUSTOMER FACILITIES FEE

Admin ② x $75.00 = 75.00

TAPPING FEE

1 ③A OR ③B x $3,500.00 = 3,500.00

TOTAL FEE = $3,575.00 pd
V#2139

DISCHARGE TO:

☐ EXISTING SEWER, BETWEEN M.H.# _____ & M.H.# _____

☐ PROPOSED EXTENSION BEGINNING AT M.H. _____ SIZE OF MAIN _____" LENGTH _____'

PROJECT LOCATION:

CONTRACT NO. _____ SHEET NO. _____ HOUSE NO. _____

AFFECTED PUMPING STATION _____ METER STATION _____

THIS PERMIT SUBJECT TO THE FOLLOWING CONDITIONS:

1. ALL CONSTRUCTION, OPERATIONS, PROCEDURES, AND DISCHARGE SHALL BE IN ACCORDANCE WITH L.T.M.A. RULES AND REGULATIONS.
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DATE OF ISSUANCE 9-19-18 BY Melissa W Kibler

APPROVAL TO COVER _____ BY _____

LETTERKENNY TOWNSHIP MUNICIPAL AUTHORITY

SEWER PERMIT NO. 6-18

NAME Z&E CONSTRUCTION
ADDRESS ~~11264 OTTERBEIN SCHOOL ROAD~~ NEWBURG, PA 17240
PHONE 717-532-6568

PROPERTY SERVED Skyline Drive Lot 7
11380 Skyline Dr.
TOWNSHIP
COUNTY

PLANS FOR CONNECTION OF:
- [x] SINGLE DOMESTIC
- [ ] MULTIPLE DOMESTIC
- [ ] OTHER

NOTE: RESIDENTS OF WELLS MUST BE 50FT FROM EXISTING OR PROPOSED SEWER LINES PER DEP REQUIREMENT. FAILURE TO COMPLY WITH THIS REQUIREMENT MAY REQUIRE RE-INSTALLATION OF YOUR PRESENT SEWER LINES

CONNECTION TO LINE OWNED BY:
- [x] L.T.M.A.
- [ ] _____

CAPACITY IMPACT & FEES:

# OF SERVICE LATERAL CONNECTIONS (from mainline to r/w)	①	
# OF BUILDING SEWER LINES (from r/w to building)	②	
# OF DWELLING UNITS	③A	
OR		
# GALLONS OF ESTIMATED SEWAGE FLOW ÷ 262.5	③B	

CONNECTION FEE
____ ① x actual cost = ____

CUSTOMER FACILITIES FEE
Admin ② x $75.00 = 75.00

TAPPING FEE
____ ③A OR ③B x $3,500.00 = 3,500.00

TOTAL FEE = 3,575.00 pd
V# 2138

DISCHARGE TO:
- [ ] EXISTING SEWER, BETWEEN M.H.# ____ & M.H.# ____
- [ ] PROPOSED EXTENSION BEGINNING AT M.H. ____ SIZE OF MAIN ____" LENGTH ____'

PROJECT LOCATION:

CONTRACT NO. ____ SHEET NO. ____ HOUSE NO. ____

AFFECTED PUMPING STATION ____ METER STATION ____

THIS PERMIT SUBJECT TO THE FOLLOWING CONDITIONS:

1. ALL CONSTRUCTION, OPERATIONS, PROCEDURES, AND DISCHARGE SHALL BE IN ACCORDANCE WITH L.T.M.A. RULES AND REGULATIONS.
2. NO PART OF THE INSTALLATION SHALL BE COVERED UNTIL INSPECTED AND APPROVED BY L.T.M.A.
3. ISSUANCE OF PERMIT SHALL NOT RELIEVE APPLICANT OF ANY RESPONSIBILITY UNDER ANY OTHER MUNICIPAL, STATE, OR FEDERAL LAW OR REQUIREMENT.

DATE OF ISSUANCE 9-19-18 BY Melissa W Kibbe

APPROVAL TO COVER ____ BY ____

DISCOVERY A-10

Regarding the Application's Exhibit I, Section 3, please clarify York-WW's responsibilities regarding Reserved Capacity Agreements after closing, including whether York-WW is being assigned LTMA Reserved Capacity Agreements or whether York-WW will act as an agent of LTMA to fulfill LTMA's Reserved Capacity Agreement responsibilities.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

See Discovery A-9. The existing Reserved Capacity Agreements will be assigned to York Water at the time of Closing.

DISCOVERY A-11

According to Page 6, Section 3.b. of the LTMA Consent Order and Agreement dated September 10, 2018, provided in the Application's Exhibit Q-2, LTMA is required to submit a Process Control Plan (PCP) to the Pennsylvania Department of Environmental Protection (DEP) for review and approval. Please provide a copy of LTMA's DEP-approved PCP along with the DEP approval letter.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

The Process Control Plan ("PCP") is attached hereto as Attachment A-11. Neither the Authority nor the Authority's engineer was able to provide the requested DEP approval letter.

Memorandum

Date:	October 10, 2018
To:	Mr. Erick M. Ammon, PADEP Compliance Specialist
From:	W. Dwayne DelGrande, P.E.
Re:	Letterkenny Township Municipal Authority (Franklin County) Consent Order & Agreement (COA), executed September 10, 2018 – 30-Day Report
cc:	Authority Chairman, Solicitor

Introduction

This memorandum provides an initial response (30-Days) to the Pennsylvania Department of Environmental Protection (PADEP) request for Corrective Action as per the COA referenced above.

Description of Facilities

The wastewater treatment facilities consist of two activated sludge (extended aeration) units operating in parallel, possessing a design flow of 42,000 gpd with an organic design load of eighty-two (82 #/D) of BOD_5. Typical loadings at the facility approximate 25,000 gpd and 25 #/D of BOD_5. Headworks pumping consists of two submersible pumps (lead and lag) within a flow equalization basin (nominal volume = 9,000 gallon) each operating at about 30 gpm (peak flow = 0.086 MGD. Final effluent discharges to a perennial stream tributary to Conodoguinet Creek.

Process Control

Principal facility performance relies upon daily process control centered upon sludge/solids management (correct sludge wasting practices).

Activated sludge process control consists of the following

Daily Actions:

1) 30 minute settleability measurement and recording of same (each aeration tank).
2) Calculation and recording of Sludge Volume Index (SVI) for each aeration tank.

Weekly Actions:

1) Measurement and recording of dissolved oxygen (D.O.) for each aeration tank.
2) Measurement and recording of sludge blanket depth for each aeration tank.

Bi-monthly Process Actions:

1) Measurement and recording of mixed liquor suspended solids (MLSS) for each aeration tank.
2) Measurement and recording of mixed liquor volatile suspended solids (MLVSS) for each tank.
3) Measurement and recording of raw wastewater biochemical oxygen demand (BOD_5).
4) Calculation of food to microorganism (F/M) ratio.
5) Calculation of sludge age.

LTMA staff operate the activated sludge processes by maintaining a Food to Microorganism (F/M) ratio that approximates 0.08 to 0.15 at all times. This requires daily wasting of about 400 gpd of mixed liquor. Operators increase wasting rates accordingly and gradually when SVI's exceed 100As a result, the MLSS concentration may vary slightly and seasonally as an appropriate value is experimentally determined by the operators. The lower organic loading rates at the facility (< 25/D or about 30% of design) typically require a relatively low MLSS (≤ 1,200 mg/l) to maintain a proper F:M ratio. No history of "sludge-bulking" or poor solids settleability exists at this facility. However, "straggler floc" can occur, as noted and described in the Memorandum dated 1/25/18 (attached).

Preliminary Investigation - Relocation of Plant Outfall 001

The LTMA Board recently authorized the surveying firm of Curfman & Zullinger of Chambersburg to survey and identify a potential treatment plant outfall relocation. This effort identified a route that requires an extension of the existing gravity outfall by approximately four hundred (400') feet downstream to the confluence of the Conodoguinet Creek and the aforementioned perennial receiving stream. This extension requires various permits, including Water Quality Management Part 2, Erosion & Sedimentation (E&S) and an apparent permit from the PADEP's Waterways & Wetlands Program.

DISCOVERY A-12

The Application's Exhibit Q-4 provides a map entitled "LTMA Wastewater Treatment Plant Outfall" dated December 16, 2019. The map depicts a 20-foot permanent utility easement for a proposed 8-inch diameter sanitary sewer outfall pipe and outlet to Conodogouinet Creek. Please provide evidence of a recorded easement for these future improvements.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

A copy of the recorded easement is attached hereto as Attachment A-12.

DEED of EASEMENT

Sewer R/W Outfall Extension

THIS EASEMENT, made this 21st day of November, 2019, by and between DENNIS L. SHAFFER, 10088 Cardinal Drive, Letterkenny Township, Franklin County, Pennsylvania, hereinafter known as the **GRANTOR**, and the Letterkenny Township Municipal Authority, an Authority organized and existing under the laws of the Commonwealth of Pennsylvania, hereinafter known as the **AUTHORITY.**

WITNESSETH:

That in consideration of the sum of $1.00, in hand paid by the **AUTHORITY,** the recipe whereof is hereby acknowledged, the **GRANTOR** does hereby grant, bargain, and covey unto the **AUTHORITY,** its successors and assigns, the free and uninterrupted use of, liberty, and privilege over and passage in, along, under, and over a certain parcel of real estate owned by the **GRANTOR,** situate in Letterkenny Township, Franklin County, Pennsylvania for the purpose of constructing an extension for the outfall from the sewage treatment plant into the Conodoguinet, as well as maintaining and operating said extension, together with any necessary valves, manholes, and other apparatus and equipment which may be used in connection with said sewer line; therewith, as is more fully described on the attached survey entitled Utility Easement Draft situate in Letterkenny Township across the lands of Dennis and Vickie Shaffer, surveyed by Curfman & Zullinger Surveying Inc. for the Letterkenny Township Municipal Authority and intended to be recorded in the Deed Records of Franklin County, Pennsylvania.

TOGETHER with the right, from time to time, to install on the said right-of-way such additional lines, valves, manholes and equipment as the **AUTHORITY** deems necessary, and the right to remove said lines, valves, manholes and equipment, with the right of free ingress, egress, and regress, for the **AUTHORITY,** its servants, agents, and employees, and such other persons as it may authorize and direct in and along the same at all times hereinafter in common with the **GRANTOR,** their heirs, executors, and administrators, and tenants and occupiers of the said ground, for the purpose of repairing, maintaining, renewing, and cleaning the said lines, with the right to dig and construct such ditches, trenches, and openings within the said right-of-way as may be necessary for the said purpose, and together with the right of entry upon the **GRANTOR'S** land for the purposes aforesaid.

RESERVING, NEVERTHELESS, unto the **GRANTOR,** their heirs and assigns, the right to use the surface of the said real estate for so long and insofar and to such extent as the use thereof will not in any way interfere with, damage, or affect the operation or use any sewer line or lines of the **AUTHORITY,** and the **GRANTOR** does hereby covenant and agree that they will not erect or permit the erection of any building or plant and trees or shrubs on the right-of-way after the execution and delivery of this Agreement which will endanger or interfere with the operation of the said sewer line or lines of the **AUTHORITY.**

TO HAVE AND TO HOLD, all and singular, the premises, rights and privileges hereby granted or mentioned or intended to so be, with the appurtenances, unto the **AUTHORITY,** its successors and assigns, to the only proper use and behalf of the **AUTHORITY**, it successors and assigns, forever, the **GRANTOR** hereby warranting the title to the premises contained in the aforementioned right-of-way.

SUBJECT, NEVERTHELESS, to the express covenant and agreement by the **AUTHORITY,** to restore the surface of the area of the sewer easement to substantially the same condition as it was prior to the exercise of any of the rights granted by this Easement;

IN WITNESS WHEREOF, the **GRANTOR** has executed this Easement the day and year first above written.

WITNESS:

Melissa W Kibbe

Dennis L. Shaffer

Dennis L. Shaffer

COMMONWEALTH OF PENNSYLVANIA :
: **SS**
:
COUNTY OF FRANKLIN :

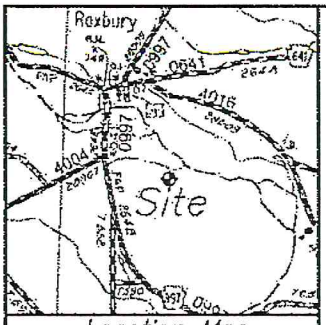
COMMONWEALTH OF PENNSYLVANIA - NOTARY SEAL
Melissa W Kibbe, Notary Public
Franklin County
My Commission Expires 03/28/2022
Commission Number 1328362

On this 21st day of November, 2019, before me, a Notary Public, personally appeared Dennis L. Shaffer, known to me or satisfactorily proven to be the person whose name is subscribed to the within instrument, and acknowledged the foregoing instrument to be his or her act and deer, and desired the same to be recorded as such.

WITNESS, my hand and notarial seal the day and year aforesaid.

Melissa W Kibbe

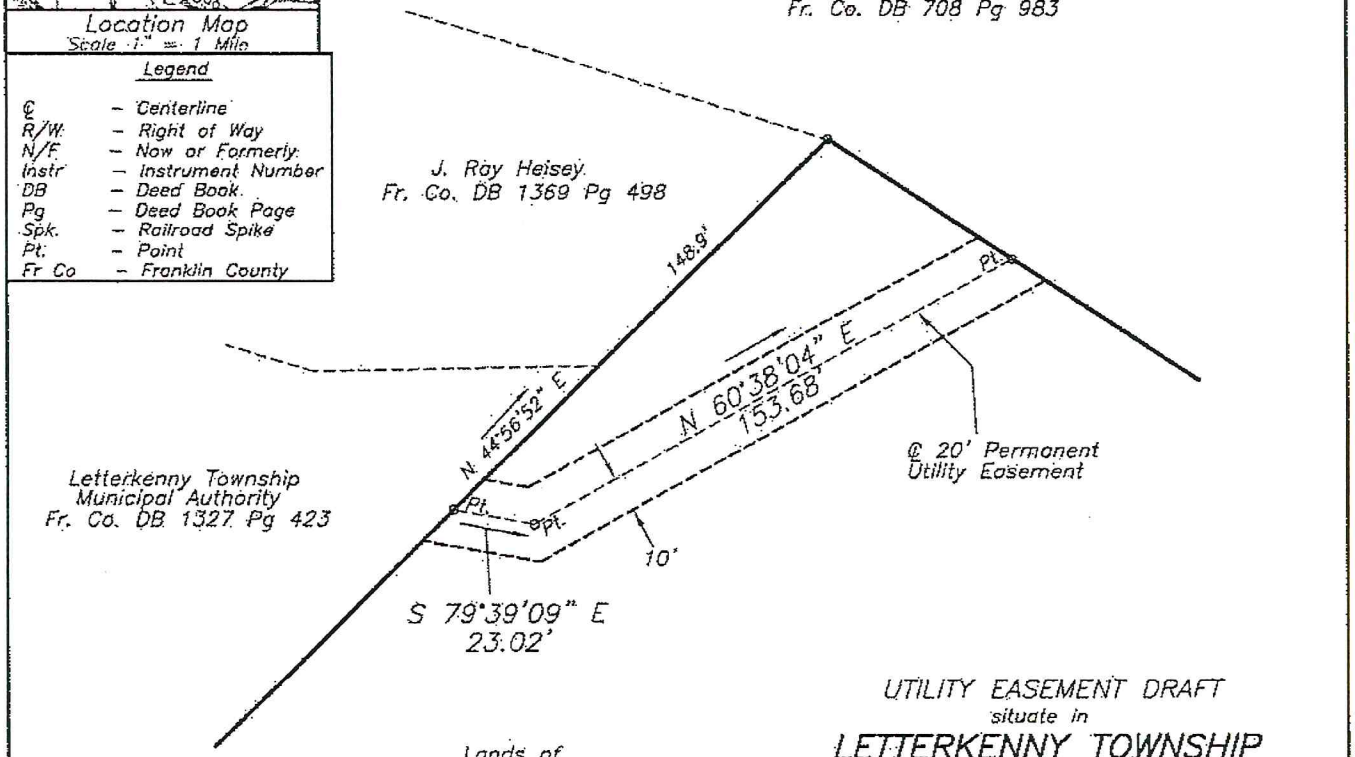
Notary Public



Location Map
Scale 1" = 1 Mile

Legend

℄	–	Centerline
R/W	–	Right of Way
N/F	–	Now or Formerly
Instr	–	Instrument Number
DB	–	Deed Book
Pg	–	Deed Book Page
Spk.	–	Railroad Spike
Pt.	–	Point
Fr Co	–	Franklin County



UTILITY EASEMENT DRAFT
situate in
LETTERKENNY TOWNSHIP
FRANKLIN COUNTY, PA
across lands of
DENNIS & VICKIE SHAFFER
for the
LETTERKENNY TOWNSHIP
MUNICIPAL AUTHORITY

0' 50' 100' 150'

Curfman & Zullinger
Surveying Inc.

Surveying * Subdivision * Stakeout

556 Lincoln Way East
Chambersburg, Pa. 17201
Phone (717-261-0749)
Fax (717-261-1705)

1" = 50'	
Date	09/30/19
Drawn	MJC
Computed	MJC
Checked	
File	2757-6

DISCOVERY A-13

Part 3, Page 2 of the 2019 Special Study indicates an engineering evaluation report was completed in 2019 for the LTMA wastewater treatment plant (WWTP). Please provide a copy of the 2019 WWTP engineering evaluation report along with all appendices and exhibits.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

A copy of the 2019 WWTP engineering evaluation report along with all appendices and exhibits is attached hereto as Attachment A-13. The report is dated December 2018, and the Authority mistakenly referred to the report as the "2019 engineering evaluation report" in the 2019 Special Study.

WASTEWATER TREATMENT FACILITIES
AERATION SYSTEM & PLANT PERFORMANCE REPORT

LETTERKENNY TOWNSHIP MUNICIPAL AUTHORITY

LETTERKENNY TOWNSHIP
FRANKLIN COUNTY, PENNSYLVANIA

December 2018

Prepared by:
DELGRANDE & ASSOCIATES LLC
29 Mill Race Lane
Fayetteville, PA 17222

Summary

As per a Consent Order & Agreement (COA) dated September 10, 2018, this report describes equipment, processes and operations at the Hillview wastewater treatment plant (Letterkenny Township Municipal Authority – "LTMA"), an extended-aeration activated sludge facility in Franklin County, PA., possessing a hydraulic design capacity[1] of 0.042 MGD.

This report confirms that the treatment facility tanks, processes and appurtenances, including the aeration system, conform to the design guidelines of the Domestic Wastewater Facilities Manual[2]. However, this report notes that final-effluent aeration practices in the existing chlorine-contact tank must improve to consistently meet discharge-permit requirements for dissolved oxygen. These improvements require that operating staff optimize air flow (increase) to the existing final-effluent aeration system in the chlorine-contact tank. This practice requires relocation/reinstallation of the flow-meter downstream of the new ultraviolet light wastewater disinfection unit. Flow-meter relocation resolves the problem of excessive diffused air interfering with the flow-metering weir.

A flow-meter technician (WG Malden) also recently confirmed the need to relocate the flow-meter as well, due to false high readings (≤ 4 gpm) that appear to result from a "backwater effect" from both excessive diffused air and the installation of the new disinfection unit. Past operation practices throttled post-aeration air flow due to flow metering accuracy concerns. This report recommends that the Owner (LTMA) correct the air/metering problem as soon as practicable, before the end of the forthcoming winter (March 21, 2019).

General Plant Process Description

Raw domestic wastewater enters through a comminutor (pretreatment-grinding) via gravity and into a 0.01 MG aerated wet-well/flow-equalization tank, followed by lifting into a splitter box via submersible headworks pumps (2 each @ 30 gpm). Flow splits into two extended aeration activated sludge tanks (nominal volume = 0.02 MG each), operating in parallel. Pumping of waste-sludge and return-activated-sludge (RAS) from the final clarifiers occurs via airlifts. A 0.01 MG aerated tank provides for waste-sludge storage for subsequent disposal by a licensed hauler. Post-aeration of final effluent occurs in the chlorine contact tank (≤ 800g) prior to disinfection in the newly-installed ultraviolet light equipment.

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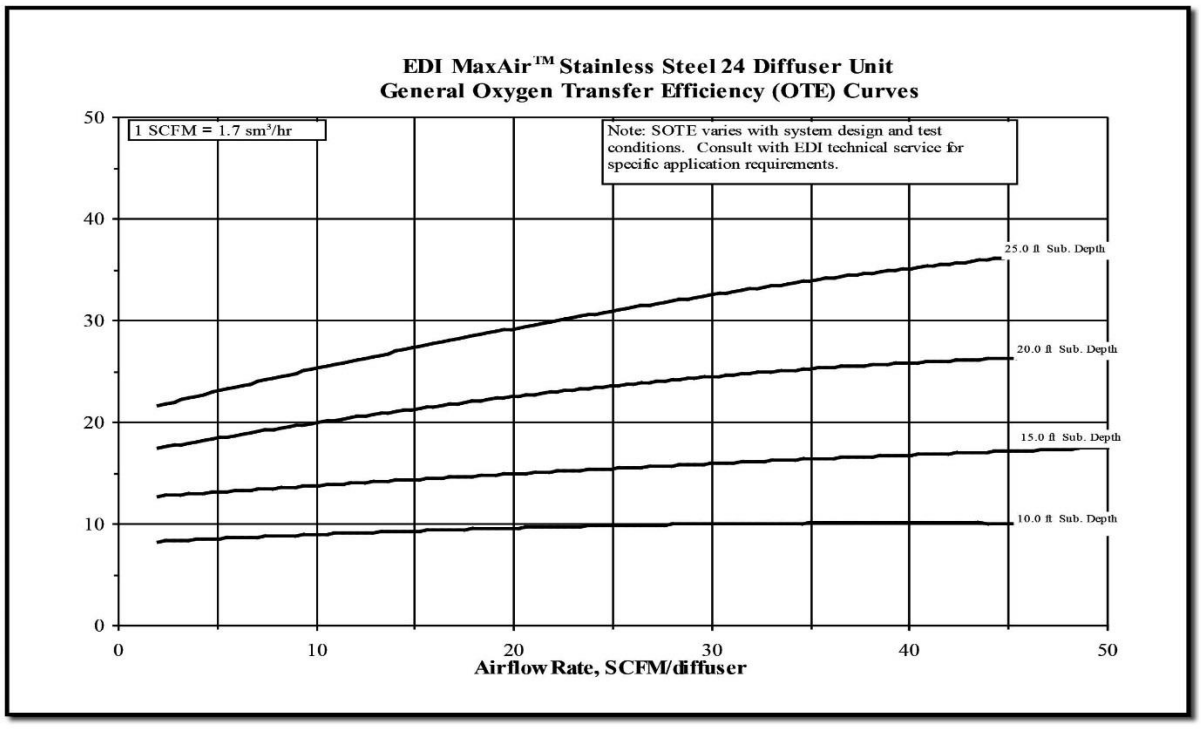
[1] *Hydraulic design capacity*—The maximum monthly design flow, expressed in millions of gallons per day, at which a plant is expected to consistently provide the required treatment or at which a conveyance structure, device or pipe is expected to properly function without creating a backup, surcharge or overflow. This capacity is specified in the water quality management permit (Part II permit issued under PACODE Chapter 91).

[2] Domestic Wastewater Facilities Manual – A Guide For The Preparation of Applications, Reports and Plans, Bureau of Water Quality Protection, Pennsylvania Department of Environmental Protection, Commonwealth of PA – October 1997.

Aeration Equipment, Organic Loading

Air-supply blowers consist of four (4) positive-displacement units, including three (3) URAI Roots™ 33 units (5HP motors) and one (1) URAI Roots™ 22 unit (2HP motor). The smaller unit remains solely dedicated to pre-aeration in the wet-well/flow-equalization tank. Pre-aeration mediates odor complaints, chiefly in hot weather. Typical air operating pressures range up to 5 psig in the activated sludge tanks. This report includes manufacturer's information about blower-unit performance.

The main air-header piping consists of recently-installed/repaired four-inch SCH80. Diffusers consist of new 24" stainless steel open-bottom coarse-bubble units, manufactured by Environmental Dynamics International. The manufacturer's diffuser performance-curve appears as follows:



Average water depth above diffusers approximates ten feet (10') in the process tanks.

Design Loads, Air and Oxygen Requirements

The wastewater treatment plant possesses an organic design rating of eighty-two (82#/D)[3] of BOD_5. The report air calculations herein assume a relatively-elevated ammonia-nitrogen loading at the facility of twenty (20#/D), a condition reflective of the use of septic-effluent systems in portions of the collection system.

The aforementioned design guidelines for the activated sludge process recommend a minimum of 1.5 # of O_2 per pound of BOD_5 (extended aeration process) and 4.6 # of O_2 per pound of ammonia-nitrogen. These guidelines result in a total theoretical oxygen requirement as follows:

BOD_5 Oxygen Requirement = (82 #/D of BOD_5) x (1.5 # O_2 per # BOD_5) = 120 #/D of O_2
NH_3-N Oxygen Requirement = (20 #/D of NH_3-N) x (4.6 # O_2 per # NH_3-N) = 90 #/D of O_2

Total Minimum Oxygen Requirement = 210 #/D

The resulting weight flow of air (210 # O_2) under standard[4] conditions thus equals:

Weight of air = (210#/Day of O_2 ÷ 20.9% O_2 fraction of air by volume) = 1,000 # of Air/Day

The theoretical air volume requirement with the existing diffusers (assuming 6% O_2 transfer in mixed liquor, rags, etc.) results as follows:

Volume of air = (1,000 #/D of air ÷ 0.07 #/ft^3 at plant site @ 86° F) ÷ 1,440 min/D ÷ 6% = 165 scfm.

A comparison of theoretical air requirements to the PADEP-recommended volume of air to mix (30 cfm per 1,000 ft^3) yields the following:

Volume of air to mix aeration tanks = 30 cfm x 5.3 TCF = 160 cfm

[3] *Organic design capacity*—The highest daily organic load at which a sewage treatment facility or a portion thereof is expected to provide a specific predetermined level of treatment. This capacity is normally specified in the water quality management permit (Part II permit issued under Chapter 91).
[4] Standard conditions, 68° F, 14.7 psia, 36% relative humidity.

Other Air Requirements

The 10,000 g. aerated sludge tank requires complete mixing capability. Thus the resulting volume of air to mix for the sludge tank equals:

Volume of air = 30 cfm x 1.3 TCF = 40 cfm .

Other air requirements include the sludge return and scum lines from the final clarifier, as well as the post-treatment aeration in the chlorine-contract tank, all of which require a total air flow of about **10 cfm.**

Summary of Theoretical Air Requirements

As noted above, total air requirements (process tanks, sludge tanks, sludge/scum lines) require approximately **210 scfm**.

Power Requirements to Deliver Air

The calculation of the weight flow of air under extreme high temperature condition (40° C = 104° F) occurs as follows:

Volume[5] of Air, cfm = ((460 + 104) ÷ (460 + 68)) x 210 scfm = 224 cfm
Weight Flow of Air, #/s = (224 cfm x 0.07 # ft^3 at plant site) ÷ 60s/min = 0.26 #/s

The theoretical brake horsepower requirement for adiabatic compression of air results from the following expression:

Brake HP = (wRT/550ne) x ((p_2/p_1)^n)-1)

Where:
$_W$ = weight flow of air, #/s
R = gas constant (53.5)
T = absolute inlet temperature, ° Rankine
$_{p1}$ = absolute inlet pressure, psia = 14.7 psia
$_{p2}$ = absolute outlet pressure, psia = 20.5 psia
n = (k-1)/k = 0.283 for air
k = 1.395 for air
e = efficiency for blowers, usually ranging from 70% to 80%

Thus, the brake HP requirement equals (wRT/550ne) x ((p_2/p_1)^n)-1)
= ((0.26#/s of air x 53.5 x 564° R) ÷ (550 x 0.283 x 70%)) x ((20.5 psi ÷ 14.7 psi) ^ $^{0.283}$ – 1)

= 4.8 BHP

[5] Volume correction for absolute temperature, 460° R = 0° F.

Principal Air Piping

Conservative air piping design traditionally maintains velocities low enough in manifolds and headers to minimize friction losses to the greatest degree practicable. Recommended velocities in smaller header pipes (4" to 10") should range from 1,800 to 3,000 fpm[6]. The following expression describes the velocities (fpm) in the principal air pipe.

Velocity, Main Header Pipe (4" dia.), fpm = 230 cfm ÷ 0.087 ft^2 = **2,600 fpm**

Summary of Findings

Given the narrative and information above, the principal air piping and the aforementioned three URAI Roots™ 33 units (3 blowers, 180 cfm each, 5HP motors) possess the ability to provide sufficient air to the treatment plant processes with the largest blower out of service. The "stand alone" URAI Roots™ 22 unit (2HP motor) suffices for pre-aeration, chiefly as a means to reduce undesirable odors.

Present operations due not fully utilize the capability of the existing post-aeration equipment in the chlorine contact tank due to the conflict between excessive diffused air and a properly functioning flow-meter. This report proposes the installation of a new flowmeter (vendor description attached) as per the previously noted end-date (March 21, 2019).

[6] Wastewater Engineering Treatment and Reuse 4th Edition – Metcalf & Eddy, McGraw Hill, 2003

DISCOVERY A-14

Page 3 of Part 3 of the 2019 Special Study, provided in the Application's Exhibit T-2, indicates the STEG system is comprised of approximately 25 effluent pumps and septic tanks. However, the Application's Paragraph 8 indicates 24 septic tanks without effluent pumps in its list of wastewater system components. Additionally, the map provided as the Application's Exhibit D appears to depict only 23 STEG system tanks. Please explain these apparent discrepancies and clarify the total number of components (i.e., tanks and effluent pumps) comprising the STEG system.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

York Water conducted an inventory of the STEG tanks, physical locations, easements, and properties served by each tank. The reference of "approximately 25 effluent pumps and septic tanks" used in the 2019 Special Study is not supported by the field inventory performed by York Water. The inventory of 24 tanks is based on York Water's field observations. The STEG system does not contain "effluent pumps." As noted in Discovery A-2 (a), any pumps located on the system transfer household wastewater to the STEG tanks and are customer-owned.

Due to the close proximity of several of the tanks, the scale of Application's Exhibit D did not allow for a clear depiction of each of the tanks. Attachment A-14 that is attached to this answer provides a more detailed scale. The tanks are labeled by a property address and a reference number as found in Attachment A-2(a).

TUS A-14: Letterkenny Township STEG Tank Locator Map 1

N

13099 Mountain Rd
14

15 13047 & 13055 Mountain Rd
13035 Mountain Rd
16

13005 Mountain Rd
19
13011 Mountain Rd
13011 Mountain Rd
18
13062 Mountain Rd
13062 Mountain Rd
17 17

13000 Mountain Rd
20

12983 Mountain Rd
21

Legend

- STEG Tanks Reference Number
- STEG Tanks - Location Address
- Manholes LTMA
- Sewer Mains LTMA
- Franklin County Parcels
- Proposed Certificated Area - LTMA
- Municipal Boundary

The York Water Company
130 EAST MARKET STREET, YORK, PENNSYLVANIA 17405
"That good York water"
SINCE 1816

0 25 50 100 150 200 Feet

TUS A-14: Letterkenny Township STEG Tank Locator Map 2

N

14149 Mountain Rd.
10a

14053 Mountain Rd.
12

14140 Mountain Rd
13

13099 Mountain Rd
14

15 13047 & 13055 Mountain Rd
13035 Mountain Rd
16

Legend

- STEG Tanks Reference Number
- STEG Tanks - Location Address
- Manholes LTMA
- Sewer Mains LTMA
- Franklin County Parcels
- Proposed Certificated Area - LTMA
- Municipal Boundary

The York Water Company
130 EAST MARKET STREET, YORK, PENNSYLVANIA 17405
"That good York water"
SINCE 1816

0 30 60 120 180 240
Feet

TUS A-14: Letterkenny Township STEG Tank Locator Map 3

N

14290 Mountain Rd
5a

14268 Mountain Rd
6

14242 Mountain Rd
7

14173 Mountain Rd & 14151 Mountain Rd
8

14222 Mountain Rd
9

14172 Mountain Rd
10

Legend

- STEG Tanks Reference Number
- STEG Tanks - Location Address
- Manholes LTMA
- Sewer Mains LTMA
- Franklin County Parcels
- Proposed Certificated Area - LTMA
- Municipal Boundary

The York Water Company
130 EAST MARKET STREET, YORK, PENNSYLVANIA 17405
"That good York water"
SINCE 1816

0 30 60 120 180 240
Feet

TUS A-14: Letterkenny Township STEG Tank Locator Map 4

N

14403 Mountain Rd
1

14374 Mountain Rd
2

14362 Mountain Rd
3

14342 Mountain Rd
4

14306 Mountain Rd
5

Legend

- STEG Tanks Reference Number
- STEG Tanks - Location Address
- Manholes LTMA
- Sewer Mains LTMA
- Franklin County Parcels
- Proposed Certificated Area - LTMA
- Municipal Boundary

0 30 60 120 180 240 Feet

The York Water Company
130 EAST MARKET STREET, YORK, PENNSYLVANIA 17405
"That good York water"
SINCE 1816

DISCOVERY A-15

Figure 1 of the Application's Exhibit T-2 does not clearly define boundaries of LTMA's existing wastewater service area. Additionally, Page 2 of Part 3 of the 2019 Special Study states that the areas identified in the 2003 Act 537 as needing sewage collection and treatment have been addressed. Please justify the inclusion of the following Franklin County Unified Parcel Identification numbers in York-WW's requested service territory by providing: evidence the property is included in LTMA's existing service area; evidence the property is not currently receiving adequate wastewater service by other means; specific references in LTMA's approved Act 537 plan that indicates Letterkenny Township intends to provide public wastewater service to the property; and copies of any requests for public wastewater service:

a) 12-0F04.-025.-000000
b) 12-0F04.-025B-000000
c) 12-0F04.-026.-000000
d) 12-0F04.-014.-000000
e) 12-0F04.-013.-000000
f) 12-0F04.-083.-000000
g) 12-0F04.-074.-000000
h) 12-0F04.-024A-000000
i) 12-0F04.-024.-000000
j) 12-0F05.-006.-000000
k) 12-0F05.-144.-000000
l) 12-0F05.-009.-000000
m) 12-0F05.-009C-000000
n) 12-0F05.-010.-000000
o) 12-0F05.-009B-000000
p) 12-0F05.-059A-000000
q) 12-0F05.-059.-000000

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

Attached as Attachment A-15 is a summary table setting forth the reasoning for including the parcels in the Company's proposed service territory. Attached as Attachment A-15a is a map of the proposed service territory, in which the Company has marked the parcels listed by TUS in this data request with certain identifying letters (*e.g.*, Parcel A, Parcel B, Parcel C, etc.), which correspond to Attachment A-15.

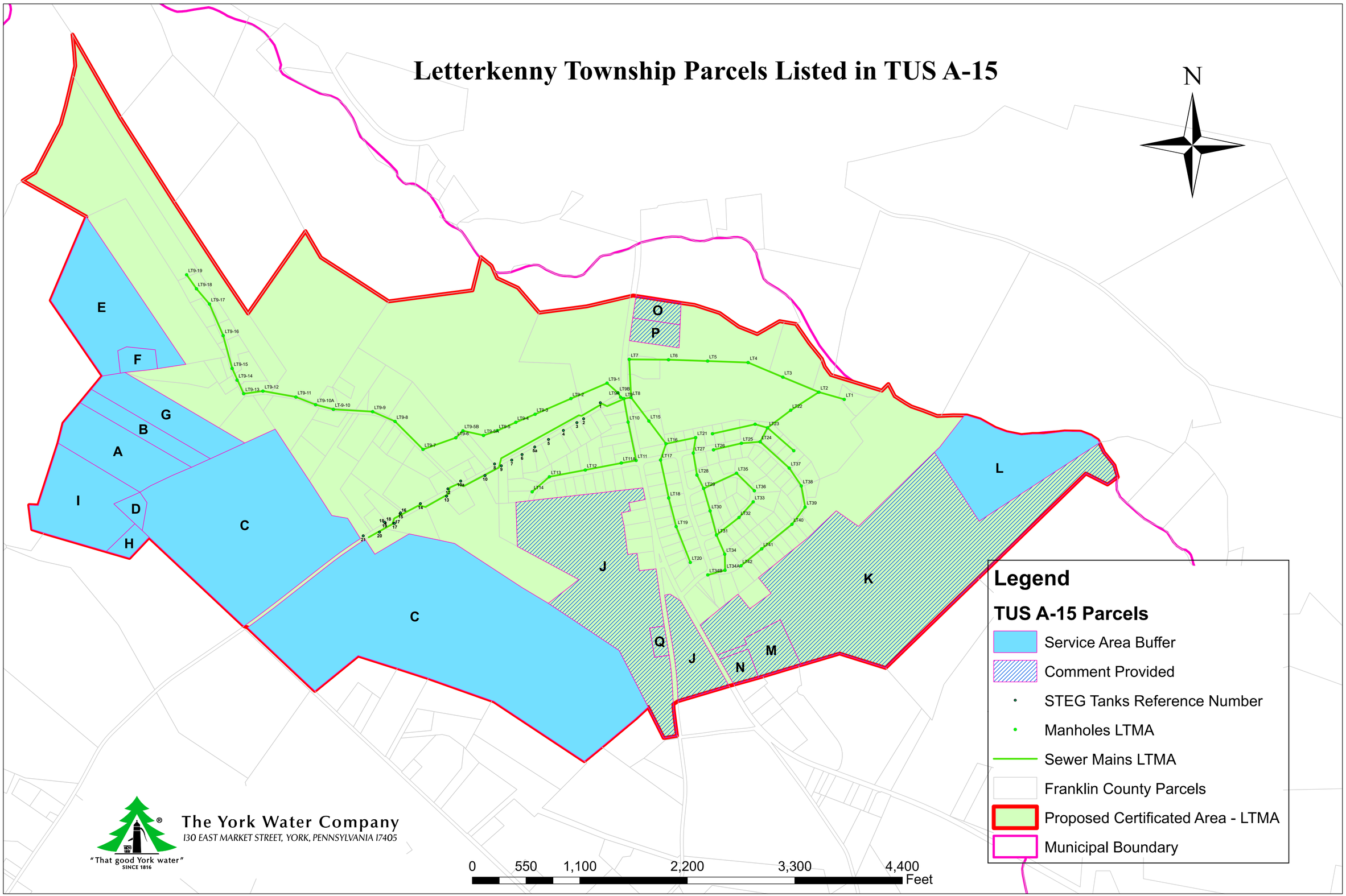
As described in Attachment A-15, Parcel M is currently served by the LTMA sanitary sewer system via a private service lateral crossing Parcel K. Parcel J submitted an approved sewer module in 1999 for 44 residential and 1 commercial connections. Parcel Q was included in the event Parcel J was served. Figure 1 of Exhibit T-2 attached to York Water's Application is a map showing the general area currently served by LTMA. York Water proposes a wastewater service territory that allows the orderly growth of the Company's wastewater territory and affords the residents of Letterkenny Township adjacent to properties currently served with the opportunity to connect to public wastewater in accordance with the provisions of the Company's wastewater tariff.

Exhibit A-15

	Parcel Ident. Number	IDENTIFIED FOR INCLUSION IN REQUESTED SERVICE AREA
A)	12-0F04.-013.-000000	Buffer Property
B)	12-0F04.-014.-000000	Buffer Property
C)	12-0F04.-024.-000000	Buffer Property
D)	12-0F04.-024A-000000	Buffer Property
E)	12-0F04.-025.-000000	Buffer Property
F)	12-0F04.-025B-000000	Buffer Property
G)	12-0F04.-026.-000000	Buffer Property
H)	12-0F04.-074.-000000	Buffer Property
I)	12-0F04.-083.-000000	Buffer Property
J)	12-0F05.-006.-000000	This parcel had submitted and was approved a sewer module for approx. 44 residential and 1 commercial units in 1999.
K)	12-0F05.-009.-000000	This parcel is situated between an existing customer (12-0F05.-009C-000000) and a parcel (12-0F05.-067.-000000) with a service lateral (not currently active - Mobile Home pad). The private service line for 12-0F05.-009C-000000 crosses the property.
L)	12-0F05.-009B-000000	Buffer Property
M)	12-0F05.-009C-000000	This property is a current customer of the LTMA system.
N)	12-0F05.-010.-000000	Property is adjacent to current customer. 12-0F05.-009C-000000
O)	12-0F05.-059.-000000	Property used as group recreational facility. Possible future need for sewer service - if on-lot disposal fails.
P)	12-0F05.-059A-000000	Property used as group recreational facility. Possible future need for sewer service - if on-lot disposal fails.
Q)	12-0F05.-144.-000000	Parcel is adjacent to 12-0F05.-006.-000000

Letterkenny Township Parcels Listed in TUS A-15

N



Legend

TUS A-15 Parcels

- Service Area Buffer
- Comment Provided
- STEG Tanks Reference Number
- Manholes LTMA
- Sewer Mains LTMA
- Franklin County Parcels
- Proposed Certificated Area - LTMA
- Municipal Boundary

0 550 1,100 2,200 3,300 4,400 Feet

The York Water Company
130 EAST MARKET STREET, YORK, PENNSYLVANIA 17405
"That good York water"
SINCE 1816

DISCOVERY A-16

Please provide a copy of LTMA's 2019 Chapter 94 Municipal Wasteload Management Report filed with DEP.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

A copy of the LTMA 2019 Chapter 94 Report is attached hereto as Attachment A-16.

LETTERKENNY TOWNSHIP MUNICIPAL AUTHORITY

LETTERKENNY TOWNSHIP

FRANKLIN COUNTY, PENNSYLVANIA

PENNSYLVANIA TITLE 25

"CHAPTER 94 REPORT"

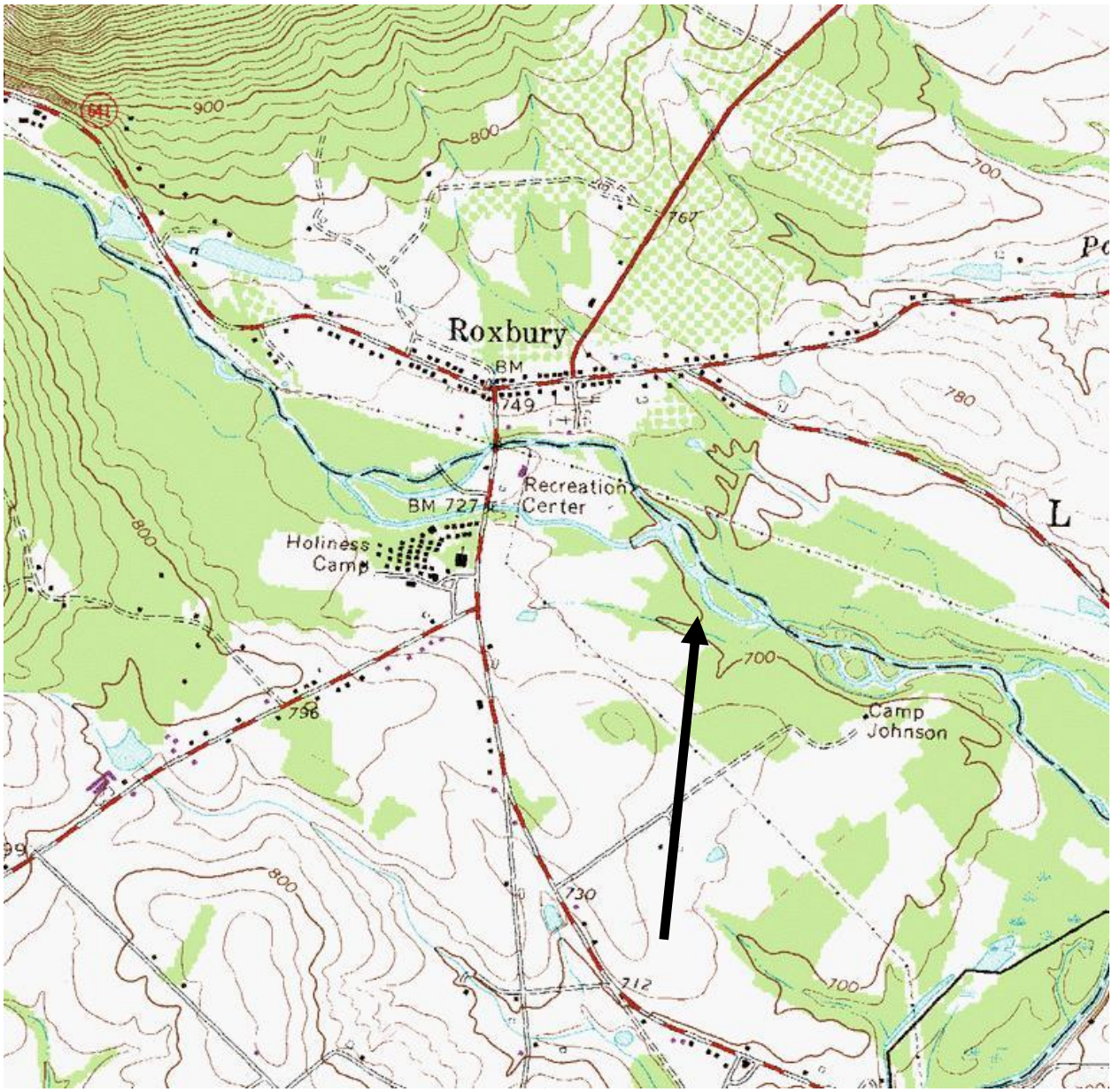
FOR

2019

Prepared by: W. Dwayne DelGrande, Operator of Record

Introduction

This report provides the requirements of Pennsylvania Code, Title 25, Chapter 94.12 – "Annual Report" to submit a summary municipal "waste load management report" for the Letterkenny Township Municipal Authority (LTMA), Franklin County, Pennsylvania. LTMA provides public sewerage services to Township residents south of Roxbury, PA (Mountain Road & Route 997 areas). The LTMA treatment facility (Hillview plant) lies east of Route 997, adjacent to a tributary of the Conodoguinet Creek (LAT 40°06'33"N, LON 77°39'17W). The topographic map below shows the general area with an arrow indicating the approximate treatment plant location.



Flow Data

The Hillview wastewater treatment facility possesses a hydraulic design capacity[1] of 0.042 MGD. Annual average flow and three-month maximum flow (February through April) averaged 0.041 MGD and 0.047 MGD respectively during the year. An attached chart and graph (PADEP format) illustrates monthly average and the three-consecutive month maximum flow recordings in conjunction with the hydraulic design capacity of the wastewater treatment facility for the last five years with projections for the next five years. The treatment facility serves a customer base of about 180 equivalent dwelling units (EDU's), according to Authority records. The apparent base flow (no inflow or infiltration) approximates 0.018 MGD more or less, the product of the estimated EDU's, the estimated equivalent population of 2 persons per EDU and a typical value for rural water use, (about 50 gallon per capita daily "gpcd").

The difference (0.023 MGD) between the recorded annual average flow and the estimated base flow (0.041 MGD – 0.018 MGD) represents an estimate of daily average infiltration/inflow (I/I) for the report year.

Flow Projections

The aforementioned PADEP-graph illustrates projected LTMA flows for the next five years based upon an assumption of modest growth. The attached graph projects a hydraulic overload [2]. However, three conditions during 2019 contributed to higher than usual readings; 1) a significant leak existed near the plant headworks, 2) Spring rainfall set apparent new records for monthly totals and 3) the flow meter remains uncalibrated and in need of reinstallation downstream of the new ultraviolet disinfection chamber that inhibits accurate flow measurements.

Organic Loading (BOD_5 [3]), Sludge

Annual average BOD_5 and monthly maximum BOD_5 averaged 28 lbs/D and 45 lbs/D (November) respectively during the year. Organic loads (lbs per day of BOD_5) remain well below the design

[1] *Hydraulic design capacity*—The maximum monthly design flow, expressed in millions of gallons per day, at which a plant is expected to consistently provide the required treatment or at which a conveyance structure, device or pipe is expected to properly function without creating a backup, surcharge or overflow.
[2] *Hydraulic overload*—The condition that occurs when the monthly average flow entering a plant exceeds the hydraulic design capacity for 3-consecutive months out of the preceding 12 months or when the flow in a portion of the sewer system exceeds its hydraulic carrying capacity. Pennsylvania Code, Title 25, Chapter 94.
[3] BOD_5 – Five day biochemical oxygen demand, the amount of dissolved oxygen consumed in five days by biological processes breaking down organic matter as defined by EPA and Standard Methods for the Examination of Water and Wastewater.

rating (82 lbs/D) for the facility. An attached PADEP-generated graph illustrates past and projected organic loads. This report does not project an organic overload[4].

Plant Operations

As previously reported, the Authority entered into a Consent Order & Agreement (COA) during September 2018, chiefly as a result of solids accumulation within the intermittent stream discharge point as well as DMR effluent violations that occurred between 2013 and 2018 as follows:

DMR Month	Parameter	Criterion	DMR Value	Permit Limit
April, 2013	Total Residual Chlorine	IMAX	2.07 mg/l	2.0 mg/l
August, 2015	Total Residual Chlorine	Mo. Avg	0.57 mg/l	0.5 mg/l
August, 2015	Total Residual Chlorine	IMAX	2.2 mg/l	1.6 mg/l
March, 2016	Fecal Coliform	Mo. Geo Mean	2,839 CFU/100ml	2.000 CUF/100ml
July, 2016	Fecal Coliform	Mo. Geo Mean	210 CFU/100ml	200 CFU/100 ml
July, 2016	pH	Minimum	5.9 S.U.	6.0 S.U.
July, 2016	Dissolved Oxygen	Minimum	4.5 mg/l	5.0 mg/l
June, 2017	Dissolved Oxygen	Minimum	4.9 mg/l	5.0 mg/l
August, 2017	Fecal Coliform	IMAX	1,330 CFU/100ml	1,000 CUF/100ml
June, 2018	Fecal Coliform	Mo. Geo Mean	300 CFU/100ml	200 CFU/100 ml

The COA required several actions including an engineering evaluation of treatment plant facilities and operations, improvements to the disinfection system and relocation of the outfall approximately 200' to discharge directly into the receiving stream.

The engineering evaluation concluded in December 2018 and confirmed that the treatment facility tanks, processes and appurtenances, including the aeration system, conform to the design guidelines of the Domestic Wastewater Facilities Manual[5]. The ultraviolet light disinfection equipment became operational in November 2018, with exceptional performance since initial installation. Construction of the outfall relocation remains outstanding.

However, the engineering design report warned that final-effluent aeration practices in the existing chlorine-contact tank must improve to consistently meet discharge-permit requirements

[4] *Organic overload*—The condition that occurs when the average daily organic load exceeds the organic design capacity upon which the permit and the plant design are based. Pennsylvania Code, Title 25, Chapter 94.
[5] Domestic Wastewater Facilities Manual – A Guide For The Preparation of Applications, Reports and Plans, Bureau of Water Quality Protection, Pennsylvania Department of Environmental Protection, Commonwealth of PA – October 1997.

for dissolved oxygen. This concern was confirmed again in 2019 as operations staff struggled to meet effluent dissolved oxygen limits during hot weather (June 2019).

Correction of the problem requires 1) optimization of the air flow (increase) to the existing final-effluent aeration system in the chlorine-contact tank and 2) relocation and reinstallation of the flow-meter downstream of the new ultraviolet light wastewater disinfection unit. Flow-meter relocation corrects the problem of excessive diffused air interfering with the flow-metering weir.

As noted in previous reports, a flow-meter technician (WG Malden) has confirmed the need to relocate the flow-meter as well, due to false high readings (≤ 4 gpm) that appear to result from a "backwater effect" from both excessive diffused air and the installation of the new disinfection unit. Past operation practices throttled post-aeration air flow due to flow metering accuracy concerns.

Continuous successful operation of the treatment facility depends chiefly upon the proper utilization of the flow equalization basin (maintaining functional pumps) on peak flow days and the application of proper operating practices, especially the maintenance of reasonable "Food to Microorganism" or F:M ratios (minimum > 0.04 at all times) in the aeration basins, a condition maintained by systematic sludge wasting.

Effluent Quality Violations

Operations staff recorded and reported the following non-compliances during the report year:

1) June 19, 2019 – Final effluent dissolved oxygen value of 4.8 mg/l vs 5.0 mg/l permit limit.

This value coincided with a heat wave, combined with a throttled air valve that supplies air to the final effluent prior to UV-disinfection.

Sewer Extensions

No sewer extensions occurred during the report year. One new customer connected to the system during the report year.

Pumping

Authority-owned pumping equipment consists of two (2) submersible pumps (30 gpm @ 30' TDH each) within the flow equalization tank, operated in lead/lag arrangement with conventional float switches. Routine operations require one pump. Significant snowmelt and storm events require simultaneous pumping as the flow equalization tank fills and empties. Gravity flow through the plant can occur if pumps fall short or fail. A high wet well alarm/telephone dialer remains

functional. Pumps remain in generally good, functional condition. Spare pumps exist on site if needed.

Sludge Solids

Authority records indicate that the facility generated about 2 dry tons during 2018, typical of the facility. This report includes a PADEP-generated spreadsheet relative to sludge production. A licensed hauler disposes of liquid sludge within the aerobic digester.

Sewer Maintenance, Repair

Approximately twenty-five (25) residents utilize septic tank effluent systems to convey wastewater to the LTMA conventional gravity sewers. One of these systems required repair (pumps and clogs) during the report year. No problems occurred within the conventional gravity (8" diameter) during the report year. The system last received televisual inspection and cleaning in 2010. A significant leak repair occurred in early 2020 near the plant headworks. The dry weather flow from the leak appeared to approximate that of a 6-inch pipe flowing ¼ full.

SLUDGE GENERATION CALCULATION

Facility Name: LTMA - Hillview Wastewater Treatment Plant
Permit Number: PA 82201
Date of Calculation: 4/23/2020

Required Information For Calculation

Average Daily Flow (mgd):	0.036	Digester Capacity (gal):	18000
Influent BOD (mg/l):	92	%Solids of Outgoing Sludge:	1.8
Effluent BOD (mg/l):	8	Monitoring Period (days):	365

Wastewater Treatment Processes

Place an "X" in the box beside the corresponding treatment process. Select a maximum of Primary Clarification and one other treatment process.

Primary Clarification [ ]	Contact Stabilization [ ]	RBC [ ]
Conventional Activated Sludge [ ]	SBR [ ]	ABF [ ]
Extended Aeration [x]	Trickling Filter [ ]	Small Plant with low SOR [ ] (<500 gpd/sq ft)

Operational Information

BOD Removed (lbs/day): 25
TSS Removed (lbs/day): 16

Digester Information

Type of Digester

Place an "X" in the box beside the corresponding treatment process.

Aerobic Digestion [x]	Anaerobic Digestion [ ]	None [ ]

Sludge Feed Rate to Digesters (gpd): 262.08
Digester Hydraulic Detention Time (days): 69
Estimated Total Solids Reduction (%): 0.35

Sludge Generation

dry lbs/day	11	wet lbs/day	592
dry tons/monitoring period	2	wet tons/monitoring period	108
gal/day	71	gal/monitoring period	25908

Amount of Sludge Reported as Being Generated by the Facility

wet tons/monitoring period
OR
dry tons/monitoring period 1.9

Enter only one of the above values. The remaining value should be "0".

Is the amount reported by the generator within 15% of the calculated value? YES

NO explanation:

What type of information was used to calculate the above information: Hauling and testing records

Dates used: 1/1/2019 TO 12/31/2019

Name of person performing the calculation: W. Dwayne DelGrande, P.E.

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PADEP Chapter 94 Spreadsh
Sewage Treatment Plar

Reporting Year: 2019

Facility Name: Letterkenny Twp. - Hillview WWTP

Permit No.: 82201

Persons/EDU: 2.2

Existing Hydraulic Design Capacity:	0.042	MGD		Existing Organic Design Capacity:	82	lbs BOD5/day
Upgrade Planned in Next 5 Years?	NO	Year:		Upgrade Planned in Next 5 Years?	NO	Year:
Future Hydraulic Design Capacity:		MGD		Future Organic Design Capacity:		lbs BOD5/day

Monthly Average Flows for Past Five Years (MGD)

Month	2015	2016	2017	2018	2019
January	0.02447	0.033	0.022	0.028	0.042
February	0.02358	0.051	0.021	0.049	0.048
March	0.03405	0.033	0.025	0.04	0.044
April	0.02645	0.023	0.025	0.052	0.037
May	0.02575	0.025	0.034	0.037	0.04
June	0.02548	0.02	0.034	0.038	0.03
July	0.01875	0.018	0.023	0.029	0.03
August	0.01733	0.019	0.023	0.038	0.026
September	0.02117	0.018	0.018	0.052	0.016
October	0.02267	0.021	0.026	0.035	0.038
November	0.02283	0.021	0.03	0.051	0.038
December	0.0265	0.021	0.023	0.048	0.047
Annual Avg	0.024086111	0.025	0.025	0.041	0.036
Max 3-Mo Avg	0.02875	0.039	0.031	0.047	0.047
Max : Avg Ratio	1.19	1.56	1.24	1.15	1.31
Existing EDUs	158.0	158.0	180.0	186.0	189.0
Flow/EDU (GPD)	152.4	158.2	138.9	220.4	190.5
Flow/Capita (GPD)	69.3	71.9	63.1	100.2	86.6
Exist. Overload?	NO	NO	NO	NO	NO

Monthly Average BOD5 Loads for Past Five Years (lbs/day)

Month	2015	2016	2017	2018	2019
January	18	19	28	27	36
February	26	31	24	35	22
March	42	29	21	32	27
April	20	29	16	28	22
May	28	17	21	24	15
June	22	29	14	35	26
July	24	19	26	25	29
August	21	13	11	17	22
September	17	18	14	22	17
October	23	22	37	22	38
November	22	19	33	25	45
December	27	16	27	19	37
Annual Avg	24	22	23	26	28
Max Mo Avg	42	31	37	35	45
Max : Avg Ratio	1.74	1.43	1.63	1.35	1.61
Existing EDUs	158	158	180	186	189
Load/EDU	0.153	0.138	0.126	0.139	0.148
Load/Capita	0.070	0.063	0.057	0.063	0.067
Exist. Overload?	NO	NO	NO	NO	NO

Projected Flows for Next Five Years (MGD)

	2020	2021	2022	2023	2024
New EDUs	5.0	5.0	5.0	5.0	5.0
New EDU Flow	0.0009	0.0009	0.0009	0.0009	0.0009
Proj. Annual Avg	0.03112	0.03202	0.03292	0.03382	0.03472
Proj. Max 3-Mo Avg	0.04011	0.04127	0.04243	0.04359	0.04475
Proj. Overload?	NO	NO	YES	YES	YES

Projected BOD5 Loads for Next Five Years (lbs/day)

	2020	2021	2022	2023	2024
New EDUs	5	5	5	5	5
New EDU Load	0.704	0.704	0.704	0.704	0.704
Proj. Annual Avg	25	26	27	27	28
Proj. Max Avg	39	40	41	42	43
Proj. Overload?	NO	NO	NO	NO	NO

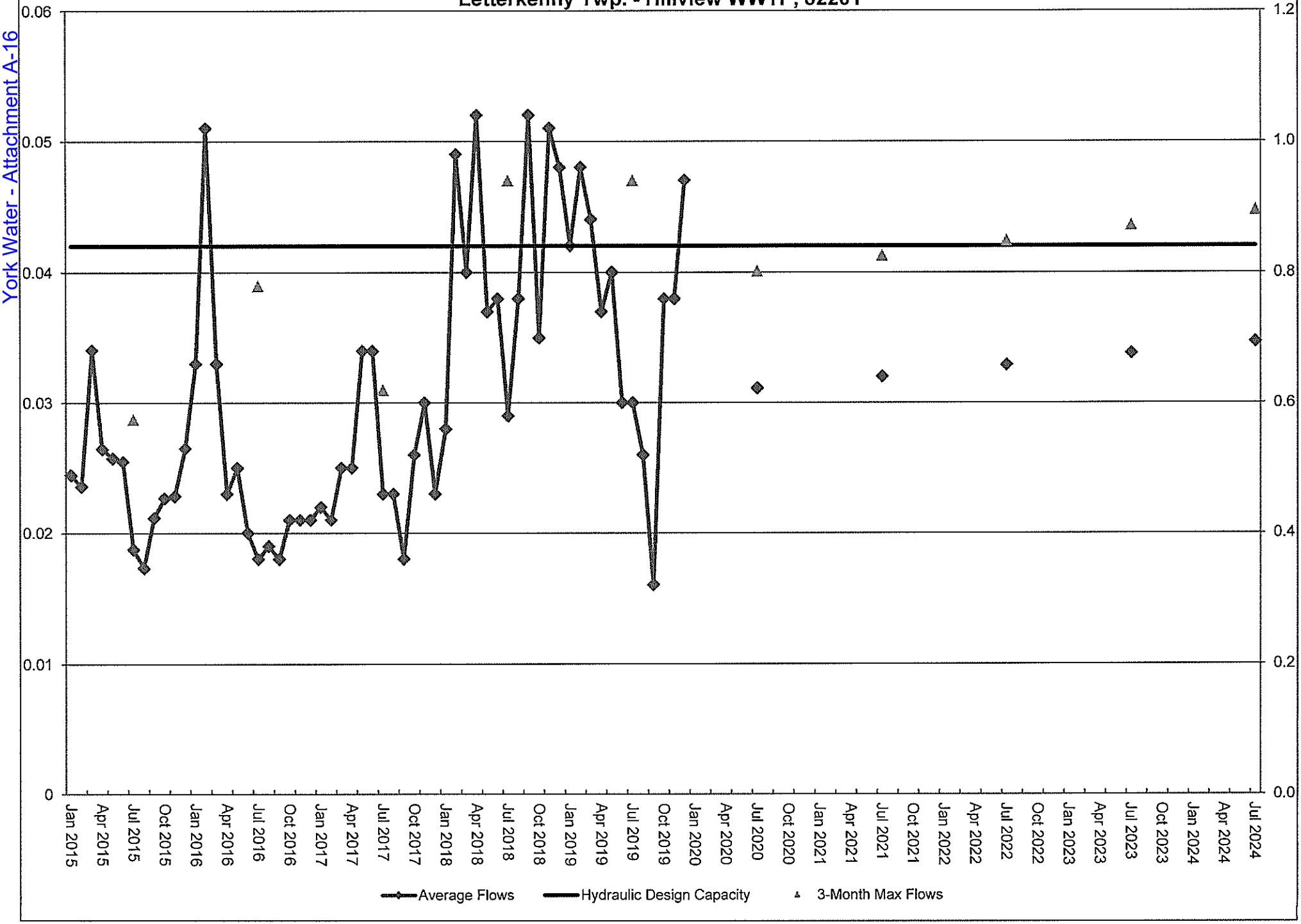
Show Precipitation Data on Hydraulic Graph?

Total Monthly Precipitation for Past Five Years (Inches)

Month	2015	2016	2017	2018	2019
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					

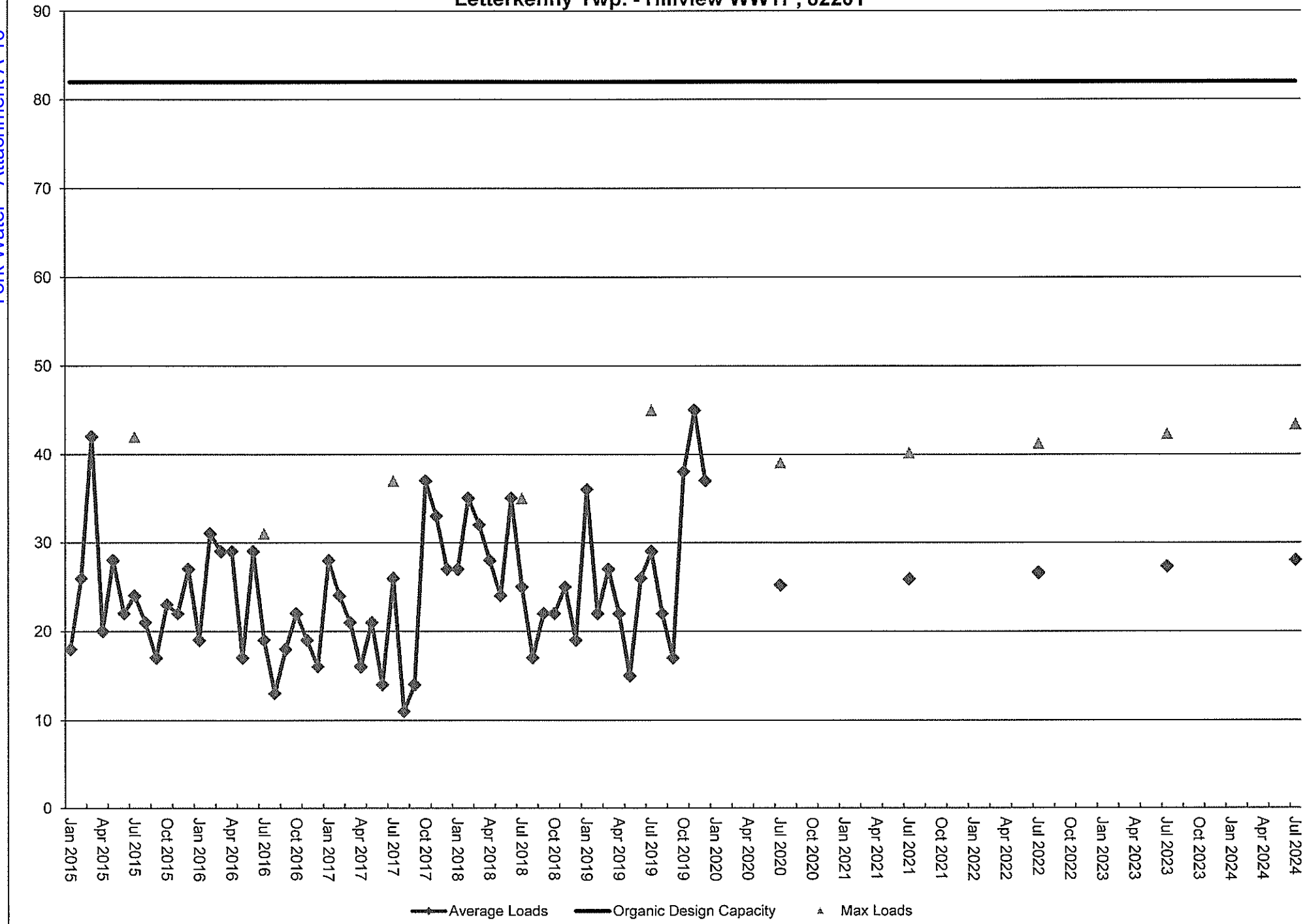
5-Year Measured and Projected Hydraulic Loads

Letterkenny Twp. - Hillview WWTP, 82201



5-Year Measured and Projected Organic Loads

Letterkenny Twp. - Hillview WWTP, 82201



DISCOVERY A-17

The Water Quality Management Part II (WQM) permit provided in the Application's Exhibit Q-1 appears to be an amendment to LTMA's original WQM permit. Please provide a copy of LTMA's WQM Permit No. 2895401 dated August 4, 1995.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

A copy of LTMA's WQM Permit No. 2895401 dated August 4, 1995, is attached hereto as Attachment A-17. A copy of corresponding PA Bulletin is attached hereto as Attachment A-17a.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

-Please note our new name-
DEPARTMENT OF ENVIRONMENTAL PROTECTION
D E P
One Ararat Boulevard
Harrisburg, PA 17110

080495

(717) 657-4590

Southcentral Regional Office

Mr. Richard F. Maffett, Chairman
Letterkenny Township Municipal Authority
4924 Orrstown Road
Orrstown, PA 17244

Re: Sewage
NPDES Permit No. PA 0082201
Part II Permit No. 2895401
Letterkenny Township, Franklin County

Dear Mr. Maffett:

Subject permits are enclosed.

The permittee shall comply with all Standard and Special Conditions attached to these Permits. Construction must be done in accordance to the permit application and all supporting documentation. Review the permit conditions and application-supporting documents before starting construction.

Particular attention should be devoted to the limitations expressed in the NPDES permit. It is the responsibility of the permittee to insure that the capacity of the treatment works continues to meet or exceed your needs.

Accompanying the NPDES Permit is a Discharge Monitoring Report (DMR) and Supplemental Reporting Forms. These are to be submitted as instructed in the permit and the attached Instruction Sheet.

If you have any questions, please direct them to Mr. Barry L. Eppley of the Permits Section.

Sincerely,

Leon M. Oberdick
Program Manager
Water Management Program

Enclosures

cc: Daniel R. Hudson, P.E., Evans Mill Environmental, Inc.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WATER MANAGEMENT PROGRAM

INTERNAL REVIEW AND RECOMMENDATIONS

Name of Applicant: Letterkenny Township Municipal Authority
Project Location: Letterkenny Township Franklin County
Permit No.: 2895401

BRIEF DESCRIPTION OF PROJECT AND DISCUSSION

This project is the upgrade and expansion of the Hillview Estates WWTP. The existing WWTP has a capacity of 17,000 gpd. The upgrade will have a capacity of 42,000 gpd. Two new aeration tanks, one final clarifier, one aerobic digester and a liquid chlorination system will be added to the existing WWTP. The design influent loading is 260 mg/l of $CBOD_5$.

Planning approval was given 2/24/95, DER Code No. A3-28910-062-3.

E & S aapproval was given by the Franklin County Conservation District on 12/15/94.

Approval is recommended.

CURRENT ESTIMATE OF COMPLETION DATE OF PROJECT (Industrial Wastes Only)

Recommendation and Action

Approve -- Issue by Region	Approve -- Issue by Central Office	Refuse	Signature	Date
[x]	[ ]	[ ]	REVIEWING HYDROGEOLOGIST	
[x]	[ ]	[ ]	HYDROGEOLOGIST IN RESPONSIBLE CHARGE	
[x]	[ ]	[ ]	Barry L. Eppley, P.E. REVIEWING ENGINEER	7-19-95
[x]	[ ]	[ ]	G. Roger Musselman, P.E. REGIONAL PERMITS SECTION CHIEF	7/25/95
[x]	[ ]	[ ]	Leon M. Oberdick PROGRAM MANAGER	7/26/95

PERMIT CONDITIONS

1. Standard 1 thru 7, 9 thru 14, 16, 18 thru 22

2. Special

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WATER MANAGEMENT PERMIT

Permit No. 2895401

A. Permittee (Name and Address):

Letterkenny Township Municipal Authority
4924 Orrstown Road
Orrstown, PA 17244

B. Project:

Name: Hillview Estates WWTP

Municipality: Letterkenny Township

County: Franklin

C. This: X Permit ___ Permit Amendment ___ Impoundment Closure

Approves: X The construction/operation of ___ Modifications to the construction/operation of:

X Sewage Treatment Facilities
___ Land Application Facilities
___ Industrial Waste Treatment Facilities
___ Other: _____

___ Sewers and Appurtenances
___ Impoundment(s) and Liner System
___ Stream Crossing(s)
___ Soil Erosion & Sedimentation Control Plan
___ Pump/Stations
___ Injection Well(s)
___ Outfall & Headwall(s)
___ Groundwater Monitoring Well(s)

Brief description of permitted activity: Expansion and upgrade of the existing WWTP from 17,000 gpd to 42,000 gpd. Organic loading design in 260 mg/l.

D. This approval is subject to the following conditions:

1. All construction, operations, and procedures shall be in accordance with the application dated 4/24/95 its supporting documentation, and addenda dated 7/6/95. Such application, its supporting documentation and addenda are hereby made part of this permit.

2. Conditions numbered 1 thru 7, 9 thru 14, 16, and 18 thru 22 of the _____ Standard Conditions dated _____ and Conditions numbered _____ of the Erosion Control Standard Conditions dated _____ are attached and made part of this permit.

3. Special Conditions designated _____ are attached and made part of this permit.

E. The authority granted by the permit is subject to the following further qualifications:

1. If there is a conflict between the application or its supporting documents and addendums and the Standard or Special Conditions, the Standard or Special Conditions shall apply.

2. Failure to comply with the Rules and Regulations of the Department or with the terms or conditions of this permit shall void the authority given to the permittee by the issuance of the permit.

3. This permit is issued pursuant to The Clean Streams Law, Act of June 22, 1937, P.L. 1987 as amended 35 P.S. §691.1 et seq. and/or the Dam Safety and Encroachments Act of November 26, 1978, P.L. 1375, as amended, 32 P.S. §693.1 et seq. Issuance of the permit shall not relieve the permittee of any responsibility under any other law.

Permit Issued:
Date 080495

Department of Environmental Protection

By: Leon M Oberdick

Leon M. Oberdick

Title: Program Manager

Water Management, Southcentral Regional Office, One Ararat Boulevard, Harrisburg, Pennsylvania 17110, (717) 657-4590.

Sewage Application No. 0795402 submitted by Central Blair County Sanitary Authority, 800 39th Street, Altoona, PA 16602 in Logan Township, Blair County to construct Sandy Run Estates Pumping Station and Sewer Extension was received in the Southcentral Region on April 24, 1995.

Sewage Application No. 2895401 submitted by Letterkenny Township Municipal Authority, 4924 Orrstown Road, Orrstown, PA 17244 in Letterkenny Township, Franklin County to expand the sewage treatment plant serving Hillview Estates was received in the Southcentral Region on April 24, 1995.

DISCOVERY A-18

Please identify the certificated wastewater operator(s) who will run the LTMA wastewater system for York Water-WW and provide a copy of each operator's DEP operator license.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

Grover E. Buracker will be the primary operator of the Letterkenny Township wastewater treatment plant. Mr. Buracker is a certified operator and employee of York Water. A copy of Mr. Buracker's operator's license is attached hereto as Attachment A-18.

Commonwealth of Pennsylvania

Department of Environmental Protection

In accordance with the
State Board for Certification of Water and Wastewater Systems Operators
and the Regulations of the
Department of Environmental Protection

GROVER E BURACKER

Is Hereby Authorized to Operate
WASTEWATER SYSTEM

Class: A,E, Wastewater
Subclass: 1,2,3,5,4

Client ID: 317481

GROVER E BURACKER
2309 FAIRWAY DR
YORK PA 17408-9454

Issue Date Jan 01, 2018
Expiration Date Dec 31, 2020

Joseph J. Swanderski
Board Chairman

Certificate No. S19041

DISCOVERY A-19

Please confirm whether Letterkenny Township has adopted a municipal or multi-municipal comprehensive plan or zoning ordinance. If so, please provide copies of letters sent to, and the responses received from, Letterkenny Township regarding the Application's consistency with applicable comprehensive plans and zoning ordinances.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

Letterkenny Township has not adopted a municipal or multi-municipal comprehensive plan or zoning ordinance.

DISCOVERY A-20

The Secretarial Letter served April 7, 2020, at Docket No. A-2020-3019424 directed York-WW to serve copies of the Application upon each county, township and related planning office included in the proposed service area. Please provide a certificate of service evidencing that a complete copy of the Application with exhibits has been served on the Franklin County Commissioners and the Letterkenny Township Planning Commission.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

A copy of the Certificate of Service is attached hereto as Attachment A-20. As seen therein, York Water served copies of the Application on the Franklin County Planning Commission and the Letterkenny Township Board of Supervisors. There is no Letterkenny Township Planning Commission.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application of The York Water Company has been served by certified mail, return receipt requested, upon the following:

Franklin County Planning Commission
340 N. 2nd St.
Chambersburg, PA 17201

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Letterkenny Township Board of Supervisors
4924 Orrstown Road
Letterkenny, PA 17244

Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Bureau of Investigation and Enforcement
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Dated: April 3, 2020

Devin T. Ryan, Esq.

DISCOVERY A-21

Please explain how approval of York-WW's Application is in the interest of York Water-WW's existing customers.

RESPONDENT:

Mark A Wheeler
Chief Operating Officer

RESPONSE:

Approval of the proposed Application will benefit the Company's existing wastewater customers because by expanding the Company's customer base, York Water's fixed wastewater costs will be spread over a greater number of customers. York Water also maintains that the Commission should take other considerations into account when determining whether the Application is necessary and proper for the service, accommodation, convenience, and safety of the public, including how:

(a) York Water will bring significant resources to the Letterkenny Township Municipal Authority wastewater system and keep it in compliance with existing and proposed regulatory requirements; and

(b) The Commission encourages utilities, such as York Water, to acquire small wastewater systems such as the system owned and operated by Letterkenny Township Municipal Authority. *See* 52 Pa. Code § 69.711.

VERIFICATION

I, Mark A. Wheeler, being the Chief Operating Officer at The York Water Company, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 19, 2020

Mark A. Wheeler