

**Application of Pennsylvania-American Water Company for Acquisition of
the Wastewater Assets of Royersford Borough
66 Pa. C.S. §1329
Application Filing Checklist – Water/Wastewater
Docket No. A-2020-3019634**

20. Proof of Compliance - provide proof of compliance with applicable design, construction and operation standards of DEP or of the county health department, or both, including:
- g. Provide documentation evidencing a 5-year compliance history with DEP of other utilities owned or operated, or both, by the buyer, including affiliates, and their officers and parent corporations with regard to the provision of utility service.⁴

RESPONSE:

- g. Pennsylvania American Water Company's compliance record has been consistently strong over the last ten years, especially as it relates to treatment technique and MCL violations, or the lack thereof. Below is a list of drinking water and non-drinking water violations in nearby systems. We are currently implementing a new environmental data tracking and reporting software that will improve our sampling and monitoring processes. Other processes and training have been implemented to eliminate future similar occurrences.

Royersford Water System Violations

- 2019 - Drinking water inspection violation due to damage chlorine and caustic soda fee pipes into the clear well
- 2019 - Drinking water monitoring violation Shady Lane Plant for failure to conduct required compliance sampling and analysis in accordance with analytical techniques

Glen Alsace Water System Violations

- 2018 - Drinking water monitoring violation for failing to collect a 6-year annual uranium sample
- 2019 - Drinking water treatment technique violation after a mechanical and electrical issue shut down the chlorine feed pump at the groundwater station for a period of time

⁴ Pursuant to Section 1329 Checklist, attached hereto as Appendix A, regarding this checklist Item 20(g), Class A public utilities need only submit compliance history for operations in the neighboring areas or a statement attesting to their compliance with this item.

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Norristown Water System

- 2016 - Non-drinking water violation broken pipe at water treatment plant discharged filtered solids into storm drain (resolved with a COA)
- 2016 - Non-drinking water violation water main break discharged chlorinated water into a nearby stream resulting in a fish kill
- 2016 - Non-drinking water violation for unpermitted discharge from sludge holding tank at the water treatment plant (resolved with a COA)
- 2019 - Drinking water violation for failure to collect a quarterly volatile organic compound (VOC) sample.

Exeter Wastewater System

- 2020 – A discharge of raw sewage from Exeter Wastewater’s sanitary sewer collection system to the surface of the ground and to an unnamed tributary to Trout Run, waters of the Commonwealth.