

Exhibit B-6



August 6, 2021

Todd Joseph, President
Conneaut Lake Park Water Corporation, Inc.
12382 Center St.
Conneaut Lake, PA 16316

Re: Public Water Supply Operation Permit No. 2009505-T1
APS ID No. 1036697
Authorization ID No. 1293777
PWSID No. 6200018
Sadsbury Township and Summit Township, Crawford County

Dear Mr. Joseph:

We are pleased to enclose Public Water Supply Permit No. 2009505-T1 for the operation of the Conneaut Lake Park Public Water system. This permit is issued in response to your request to transfer the Public Water Supply Permit from the Trustees of Conneaut Lake Park, LLC to Conneaut Lake Park Water Corporation, Inc. The Department of Environmental Protection ("Department") received this request on April 2, 2021.

A comprehensive file review conducted by Department staff, identified four (4) Public Water Supply permits that are associated with this water system as follows: 2084504-T3-MA1, 2009505, 2009505-MA1, and 2084504-T2-MA2. The option to feed sodium silica, as authorized under Permit No. 2009505, is also revoked since any potential future need for corrosion control will have to be reevaluated; however, all other applicable records, including plans, specifications, reports, and supporting documents associated with these permits are now consolidated as part of this permit transfer and will be subject to the six (6) special conditions associated with Permit Nos. 2009505 and 2009505-MA1.

Be aware that this authorization also requires you to provide 4-log inactivation of viruses pursuant to 25 Pa. Code § 109.1302. The Department agrees that 4-log treatment of viruses can be achieved at Entry Point 101 by maintaining a free chlorine residual of 1.0 mg/L. The authorization is based on the information provided in GWR Permit No. 2009505-MA1 including:

Entry Point 101, Well No. 1 and Well No.2; a peak flow rate of 180 gallons per minute through the chlorine contact segment consisting of 310 LF of 20-inch diameter contact line providing a minimum effective volume of 5,091 gallons maintained at all times and a minimum water temperature of 5°C.

Compliance monitoring of free chlorine at Entry Point 101 shall continue per the compliance monitoring requirements for public water systems conducting daily grab sample monitoring. The monitoring requirements can be found at Title 25 Pa. Code § 109.1305 (a) (2) of the Department's regulations. The reporting requirements associated with compliance monitoring for public water systems conducting

daily grab sample monitoring can be found at Title 25 Pa. Code § 109.1307 (a) (1)(i) of the Department's regulations. The entire Groundwater Rule regulations can be found on the PA Code website at the following link, <http://www.pacode.com/secure/data/025/chapter109/subchapMtoc.html>.

These reporting requirements can be satisfied by completing an SDWA-1 form and submitting it through the Drinking Water Electronic Lab reporting (DWELR) web application within the first 10 days following the end of each monthly monitoring period. Please contact your sanitarian with further reporting questions. Information regarding DWELR registration and support can be found on the Pennsylvania Department of Environmental Protection's website at the following link: http://www.portal.state.pa.us/portal/server.pt/community/public_drinking_water.

Please be advised that this authorization does not confer approval to offer, render, furnish, or supply water service to the public under Section 1101 of the Public Utility Code, 66 Pa. C.S. § 1101. This approval may be obtained only from the Pennsylvania Public Utility Commission ("PUC"). Therefore, you need to contact the PUC to ensure compliance with their regulatory requirements.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800.654.5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://ehb.courtapps.com> or by contacting the Secretary to the Board at 717.787.3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717.787.3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions concerning this matter, please contact William Gaspari, P.E. at 814.332.6305.

Sincerely,



Matthew D. Postlewaite
Acting Regional Manager
Safe Drinking Water Program

Enclosures

cc: James Becker – Trustees of Conneaut Lake Park, LLC
Sean Donnelly – PUC (pdf)
M. Postlewaite (pdf only)
B. Schott (pdf only)
W. Gaspari (pdf only)
SDW-Hrsbg-Facilities Permitting
File

MDP:BCS:WAG



PUBLIC WATER SUPPLY PERMIT

NO. 2009505-T1

<p>A. PERMITTEE: (Name and Address)</p> <p>Conneaut Lake Park Water Corporation, Inc. 12382 Center Street Conneaut Lake, PA 16316</p>	<p>B. PROJECT/PLANT LOCATION</p> <p>Address <u>12382 Center Street</u> Municipality <u>Sadsbury and Summit Townships</u> County <u>Crawford</u></p>
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C. THIS PERMIT APPROVES FOR: 1. CONSTRUCTION 2. OPERATION OF FACILITIES 2084504-T3-MA1, 2009505, 2009505-MA1, and Approved Under Construction Permit Nos. 2084504-T2-MA2

AS INDICATED BELOW:

<u>Source</u>	<u>Facilities</u>	<u>BVRB</u>
<input checked="" type="checkbox"/> Well(s)*	<input type="checkbox"/> Impoundment	<input type="checkbox"/> Bottled Water System
<input type="checkbox"/> Spring(s)	<input type="checkbox"/> Settling	<input type="checkbox"/> Bulk Water Hauling System
<input type="checkbox"/> Surface Water	<input checked="" type="checkbox"/> Filtration	<input type="checkbox"/> Vended Water System
<input type="checkbox"/> Finished Water	<input checked="" type="checkbox"/> Iron and Manganese Treatment	<input type="checkbox"/> Retail Water Facility
*Well Nos. 1 and 2	<input type="checkbox"/> Softening	
	<input type="checkbox"/> Fluoridation	
	<input checked="" type="checkbox"/> Distribution Facility	
	<input type="checkbox"/> General Corrosion Control	
	<input type="checkbox"/> Corrosion Control for lead/copper	
	<input checked="" type="checkbox"/> Disinfection	
	<input type="checkbox"/> Pump Station(s)	
	<input checked="" type="checkbox"/> Transmission Lines	
	<input checked="" type="checkbox"/> Finished Water Storage	
	<input checked="" type="checkbox"/> Other <u>Arsenic Removal/GWR 4-log Treatment</u>	

KNOWN AS Well Nos. 1 and 2, AD26 arsenic treatment system, sodium hypochlorite feed system, ferric chloride, 75,000-gallon finished water storage tank, two (2) 4,000-gallon backwash/recycle tanks and 310 LF of 20-in. diameter chlorine contact pipe to provide 4-log treatment of viruses for Well Nos. 1 and 2 via Entry Point 101, and distribution system

LIMIT OF AUTHORIZATION

YOU ARE HEREBY AUTHORIZED TO CONSTRUCT OR OPERATE, AS INDICATED ABOVE, PROVIDED THAT FAILURE TO COMPLY WITH CHAPTER 109, OF THE RULES AND REGULATIONS OF THE DEPARTMENT OF ENVIRONMENTAL PROTECTION OR THE TERMS OR CONDITIONS OF THIS PERMIT SHALL VOID THE AUTHORITY GIVEN TO THE PERMITTEE BY THE ISSUANCE OF THE PERMIT.

THE PLANS, SPECIFICATIONS, REPORTS AND SUPPORTING DOCUMENTS SUBMITTED AS PART OF THE PERMIT APPLICATION BECOME PART OF THE PERMIT.

NO DEVIATIONS FROM APPROVED PLANS OR SPECIFICATIONS AFFECTING THE TREATMENT PROCESS OR QUALITY OF WATERS SHALL BE MADE WITHOUT WRITTEN APPROVAL FROM THE DEPARTMENT.

THIS PERMIT IS ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL PROTECTION UNDER THE AUTHORITY OF THE PENNSYLVANIA SAFE DRINKING WATER ACT, THE ACT OF MAY 1, 1984 (P.L. 206, NO. 43). OPERATION SHALL COMPLY WITH THE PROVISIONS OF CHAPTER 109 ADOPTED UNDER THE AUTHORITY IN SECTIONS 4 AND 6(e) OF THE PENNSYLVANIA SAFE DRINKING WATER ACT.

THIS PERMIT IS SUBJECT TO THE ATTACHED SPECIAL CONDITIONS 1 - 6

<p>PERMIT ISSUED</p> <p>Date <u>August 6, 2021</u></p>	<p>DEPARTMENT OF ENVIRONMENTAL PROTECTION</p> <p>By: <u></u> Matthew D. Postlewaite Acting Regional Manager Title <u>Safe Drinking Water Program</u></p>
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SAFE DRINKING WATER PROGRAM

Date: August 6, 2021

Permit No.: 2009505-T1

SPECIAL CONDITIONS

Conneaut Lake Park Water Corporation, Inc.

1. The treatment facility shall be operated in accordance with the following conditions to provide 4-log treatment of viruses to water from groundwater source "**Well Nos. 1 and 2**" via **Entry Point 101**:
 - A. The instantaneous maximum flow through the chlorine contact segment (*310 LF of 20-inch diameter contact line*) shall not exceed 180 gpm to provide contact time for the 4-log inactivation for viruses. No service taps shall be installed to the designated chlorine contact segment before the compliance monitoring location;
 - B. The chlorine contact segment shall remain full at all times to provide contact time for the 4-log inactivation for viruses;
 - C. A residual disinfectant concentration of no less than **1.0 mg/L**, expressed as free chlorine, shall be maintained at the compliance monitoring location (Entry Point 101) after the chlorine contact segment; and
 - D. Compliance monitoring must be conducted pursuant to 25 PA. Code § 109.1305 and reported to the Department pursuant to 25 PA. Code § 109.1307.
2. The AdEdge AD26 treatment system is permitted at a maximum flow rate of 200 gpm, (equivalent to 6.3 gpm/ft² with two filters online and the third in backwash mode, or 4.2 gpm/ft² with all three filters online), for a total daily production of 288,000 gpd.
3. Well Nos. 1 and 2 are individually permitted with a combined safe yield of 300 gpm. The 300 gpm can come from either well or from any combination of the two as long as the flow does not exceed 300 gpm total.
4. Pursuant to the requirements of 25 Pa. Code § 109.301, entry point samples for arsenic shall be obtained once per calendar quarter. The samples shall be analyzed and reported by a Department accredited laboratory for arsenic concentration.
5. Samples of the raw and finished water shall be collected on a routine basis and analyzed for arsenic concentrations by a Department accredited laboratory or by the operator of the supply using an appropriate calibrated field analytical test kit. The sampling frequency shall be established by the certified operator to maintain operational efficiency.
6. Well Nos. 1 and 2 must be accurately identified with obvious markings indicating the well's number and designated active/permitted or inactive/unpermitted as applicable. The well number and designation shall be affixed to each well in a legible, conspicuous, and permanent manner.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SAFE DRINKING WATER PROGRAM

INTERNAL REVIEW AND RECOMMENDATIONS

Applicant	Conneaut Lake Park Water Corporation, Inc. – Conneaut Lake Park	Municipality	Sadsbury and Summit Townships	Permit No.	2009505-T1
		County	Crawford		

This permit application is for the transfer of Permits Nos. 2084504-T3-MA1, 2009505, 2009505-MA1, and 2084504-T2-MA2 as all prior permits have been consolidated/revoked in previous permit actions. The permit transfer involves a change in ownership of the Conneaut Lake Park water system from the Trustees of Conneaut Lake Park, LLC to Conneaut Lake Park Water Corporation, Inc (CLPWC). The CLPWC will take over all assets and responsibilities associated with this public water system.


Previous Owners: Trustees of Conneaut Lake Park, LLC (James J. Becker, Executive Director)
12382 Center Street, Conneaut Lake, PA 16316

New Owner: Conneaut Lake Park Water Corporation, Inc. (Todd Joseph, President)
12382 Center Street, Conneaut Lake, PA 16316

Facility Description: The Conneaut Lake Park public water system consists of two (2) groundwater wells (Well Nos. 1 and 2) with vertical turbine pumps, a treatment plant, one (1) 75,000-gallon finished water storage tanks, and a distribution system. The system provides water to approximately 200 domestic and commercial connections and has an average daily demand of 45,752 gallons per day. Well No. 1 features a 50 hp vertical turbine pump with a permitted capacity of 300 gpm, while Well No. 2 features a 25 hp vertical turbine pump with a permitted capacity of 300 gpm. The wells alternate in operation. Raw water from the wells is pumped through a pressure and flow reducer valve, which reduces the flow rate to 180 gpm. Liquid sodium hypochlorite and ferric chloride are then injected prior to a static mixer via separate metering pumps (ProMinent beta Model BT4a-1601). The chemically treated water then flows through an AdEdge filtration system that features three (3) adsorption filters as needed for arsenic, iron, and manganese removal. Water that is utilized for backwashing the filtration system is stored in two (2) 4,000-gallon holding tanks where the solids are allowed to settled out while the tank supernatant is recycled through a bag filter and returned to the head of the treatment system. After filtration, the filtrate flows through a chlorine contact

CURRENT ESTIMATE OF COMPLETION DATE OF PROJECT

RECOMMENDATION AND ACTION

Approve	Return	Refuse	Signature	Date
			WILLIAM A. GASPARI, P.E. REVIEWING ENGINEER	
			BRAD C. SCHOTT, P.E. ENVIRONMENTAL ENGINEER MANAGER	
			MATTHEW D. POSTLEWAITE ACTING REGIONAL MANAGER 	6 Aug 2021

HYDRO GEOLOGIST REVIEW INCLUDED: YES NO N/A

PERMIT CONDITIONS:

1. STANDARD --
2. SPECIAL (Use additional sheets if necessary) -- 1 - 6

segment, as needed for 4-log treatment, which consists of 310 linear feet of 21-in. diameter piping. From the chlorine contact segment, the finished water flows to the distribution system and the 75,000-gallon finished water storage tank.

Entry Point No. 101 4-Log Calculation Summary Table

Treatment Segment No.	Chlorine Residual C (mg/l)	pH (S.U.)	Temp. (°C)	Peak Flow (gpm)	Minimum Volume (gal.)	Baffling Factor (BF)	Effective Volume (gal.) V*BF	CT Actual C*(Ev/PF)	CT Req'd	Log Reduction Calculated (viruses)
*Seg. 1:	1.0	8	5.0	180	5,091	1.0	5,091	28.28	8.0	14.14
Total Log Reduction										14.14

*Segment 1: one (1) 310 LF of 21-in. diameter contact pipe.

Based upon the above information, it appears that Entry Point 101 is able to maintain a 14.14 log inactivation of viruses at a chlorine residual concentration of 1.0 mg/L and a maximum flow rate of 180 gpm. The system can meet 4-log inactivation requirements with a chlorine residual of 0.4 mg/L as noted in PWS Permit No. 2009505; however, a chlorine concentration of 1.0 mg/L appears to be required by PWS Permit No. 2009505-MA1 since the location of the continuous chlorine analyzer is just prior to the chlorine contact segment at Entry Point 10. Sampling at a blow-off located after the chlorine contact segment indicates that chlorine degradation in the contact segment results in a concentration reduction of approximately 0.2 mg/L as free chlorine. It is important to note that the system no longer utilizes a continuous chlorine analyzer for free chlorine analysis, as indicated in Permit Nos. 2009505 and 2009505-MA1, rather the plant operator uses a portable colorimeter to analyze grab samples from the entry point. The system is not required to use a continuous chlorine analyzer.

Chlorine Monitoring Instrument and Location: The system uses a Hach DR900 portable colorimeter for free chlorine analysis at Entry Point 101. This location was authorized under PWS Permit No. 2009505-MA1.

Permits: The following table summarizes all active/relevant permits that were issued to the previous owner of the water system:

Permit No.	Date Issued	Description
2084504-T3-MA1	6/28/2007	Clean and recoat interior of the 75,000-gallon finished water storage tank
2009505	11/9/2009	Operation of Well Nos. 1 and 2, AD26 arsenic treatment system, sodium hypochlorite feed system, ferric chloride feed system, one (1) 75,000-gallon finished water storage tank, option to feed sodium silica, and two (2) 4,000-gallon backwash/recycle tanks
2009505-MA1	1/19/2012	Demonstration of 4-log treatment of viruses for groundwater sources
2084504-T2-MA2	10/11/2018	Repair of the 75,000-gallon finished water storage tank

Recommendations: There are no outstanding Public Water Supply issues or violations associated with the facility that would prevent transfer of the permit; therefore, issuance of Permit No. 2009505-T1 is recommended. It is further recommended to consolidate Permit Nos. 2084504-T3-MA1, 2009505, 2009505-MA1, and 2084504-T2-MA2 into Permit No. 2009505-T1; however, the option to feed sodium silica will be revoked as any future corrosion control measures that may be implemented will need to be reevaluated. All applicable records, including plans, specifications, reports, and supporting documents associated with these permits are now part of Permit No. 2009505-T1. This permit transfer will be subject to the special conditions associated with the following former permits: Permit No. 2009505-MA1 as Special Conditions No. 1 and Permit No. 2009505 as Special Condition Nos. 2-6.