

EXHIBIT P

February 13, 2020

Jennifer Hepler, Manager
Municipal Authority of the
Borough of Shenandoah
P.O. Box 110
Shenandoah, PA 17976

Re: 2019 Annual Inspection Report
DEP File No. D54-004
Ringtown No. 5 Dam
Union Township, Schuylkill County

Dear Ms. Hepler:

The 2019 Annual Inspection Report for Ringtown No. 5 Dam was submitted by Alfred Benesch & Company on December 18, 2019. We thank the Municipal Authority of the Borough of Shenandoah (Authority) for its cooperation with the Department of Environmental Protection, Division of Dam Safety (Department) and for conducting the 2019 Annual Inspection.

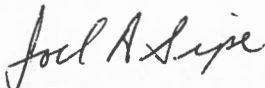
We have reviewed the inspection report and concur with many of the recommendations explained in it. The Authority should review these recommendations with its engineer and implement any necessary maintenance and repairs. Please be advised that repairs, other than minor maintenance, will likely require written approval from the Department prior to performing any work. Minor maintenance includes activities such as vegetation and debris removal, filling of animal burrows, and patching or sealing of small areas. *The results of any repair or maintenance work should be documented by the Authority's engineer in the 2020 Annual Inspection Report.*

In our March 7, 2019 letter, the Department requested that the Authority direct its engineer to investigate the erosion along the RCC spillway and develop a repair plan to prevent further erosion. According to our records this plan was not submitted. This repair will stabilize the eroded areas until the Authority and its engineer complete the design for the complete rehabilitation of the dam.

The Department acknowledges receipt of the January 23, 2019 letter, which outlines a schedule to address the outstanding issues at all the Authority's dams. The schedule indicates that the Authority would have completed installing piezometers and a geotechnical analysis by February 2020 for this dam. According to our records these deadlines have not been met. The Authority must follow the deadlines as outlined in the approved schedule to bring the dams into compliance.

If the Authority or its engineer has any questions regarding this letter, please contact me at 717.772.5956.

Sincerely,



Joel A. Sipe
Construction, Inspection and Monitoring Section
Division of Dam Safety

cc: Jennifer M. Kowalonek, P.E., Alfred Benesch & Company



February 13, 2020

RECEIVED
FEB 17 2020

Jennifer Hepler, Manager
Municipal Authority of the
Borough of Shenandoah
P.O. Box 110
Shenandoah, PA 17976

BY:

Re: 2019 Annual Inspection Report
DEP File No. D54-007
Raven Run No. 2 Dam
West Mahanoy Township, Schuylkill County

Dear Ms. Hepler:

The 2019 Annual Inspection Report for Raven Run No. 2 Dam was submitted by Alfred Benesch & Company on December 18, 2019. We thank the Municipal Authority of the Borough of Shenandoah (Authority) for its cooperation with the Department of Environmental Protection, Division of Dam Safety (Department) and for conducting the 2019 Annual Inspection

We have reviewed the inspection report and concur with many of the recommendations explained in it. The Authority should review these recommendations with its engineer and implement any necessary maintenance and repairs. Please be advised that repairs, other than minor maintenance, will likely require written approval from the Department prior to performing any work. Minor maintenance includes activities such as vegetation and debris removal, filling of animal burrows, and patching or sealing of small areas. *The results of any repair or maintenance work should be documented by the Authority's engineer in the 2020 Annual Inspection Report.*

As mentioned in several of our previous letters, the Dam Permit Application the Authority submitted for this dam was returned to the Authority due to the lack of information and not resubmitting the missing information by the deadline. The Raven Run No. 2 Dam is currently being operated without a valid Dam Safety permit, which is a violation of the Department's Dam Safety and Waterway Management regulations (§105.11). The Authority must direct their engineer to complete the application and resubmit it to the Department.

As mentioned in several of our previous letters, the spillway for the Raven Run No.2 Dam is considered inadequate. The Department requests that the Authority include the modifications to address the inadequate spillway capacity in the permit application. In addition, the Authority will be required to install upstream controls on the outlet drawdown system as part of the rehabilitation project.

According to the 2019 Annual Inspection Report, movement of the embankment near the center of the downstream face of the dam has been documented. Due to the newly identified embankment movement, the steepness of the downstream slope and the seepage discharging from the toe drain system, the Department requests that the Authority monitor this dam closely for any change in the dam's condition. If changes occur the Authority must notify its engineer and the Department immediately.

The Department acknowledges receipt of the January 23, 2019 letter, which outlines a schedule to address the outstanding issues at all the Authority's dams. The schedule indicates that the Authority will begin work on this dam in 2022. The Department looks forward to working with the Authority as it moves forward in meeting the proposed deadlines and bringing the dams into compliance.

If the Authority or its engineer has any questions regarding this letter, please contact me at 717.772.5956.

Sincerely,

Joel A. Sipe
Construction, Inspection and Monitoring Section
Division of Dam Safety

cc: Jennifer M. Kowalonek, P.E., Alfred Benesch & Company

Jennifer Hepler, Manager
Municipal Authority of the Borough of Shenandoah

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February 13, 2020

bcc: Pamela Kania, NERO, Dam Safety and Technical Services Section (OAIR sent inter-office)

Kreider
Sipe
File (54-007)
Reading File

JAS:sp

**JENNIFER M KOWALONEK PE
ALFRED BENESCH & COMPANY
PO BOX 1090
POTTSVILLE PA 17901**



February 13, 2020

Jennifer Hepler, Manager
Municipal Authority of the
Borough of Shenandoah
P.O. Box 110
Shenandoah, Pa 17976

Re: 2019 Annual Inspection Report
DEP File No. D54-008
Raven Run No. 3 Dam
West Mahanoy Township, Schuylkill County

Dear Ms. Hepler:

The 2019 Annual Inspection Report for Raven Run No. 3 Dam was submitted by Alfred Benesch & Company on December 18, 2019. We thank the Municipal Authority of the Borough of Shenandoah (Authority) for its cooperation with the Department of Environmental Protection, Division of Dam Safety (Department) and for conducting the 2019 Annual Inspection.

We have reviewed the inspection report and concur with many of the recommendations explained in it. The Authority should review these recommendations with its engineer and implement any necessary maintenance and repairs. Please be advised that repairs, other than minor maintenance, will likely require written approval from the Department prior to performing any work. Minor maintenance includes activities such as vegetation and debris removal, filling of animal burrows, and patching or sealing of small areas. *The results of any repair or maintenance work should be documented by the Authority's engineer in the 2020 Annual Inspection Report.*

In our previous letters, the Department requested that the Authority finalize the plans and specifications for the installation of piezometers. The presence of slough areas and bulges is of great concern to the Department. The installation of piezometers should provide insight into whether an underlying problem is beginning to develop. Plans and specifications for piezometer placement must be submitted to this office for review and approval.

As mentioned in several of our previous letters, the spillway for the Raven Run No.3 Dam is considered inadequate. The Department's rainfall study has been completed and the results can be found on the Department's website which will assist in evaluating the spillway capacity. As the Authority and its engineer evaluate solutions to address the spillway capacity, the Department requests that the design include the installation of a seepage collection and monitoring system for seepage along the downstream toe of the dam and install upstream controls on the outlet drawdown control system.

The Department acknowledged receipt of the January 23, 2019 letter, which outlines a schedule to address the outstanding issues at all the Authority's dams. The schedule indicates that the Authority will begin work on this dam in 2022. The Department looks forward to working with

Jennifer Hepler, Manager
Municipal Authority of the Borough of Shenandoah

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February 13, 2020

the Authority as it moves forward in meeting the proposed deadlines and bringing the dams into compliance.

If the Authority or its engineer has any questions regarding this letter, please contact me at 717.772.5956.

Sincerely,

Joel A. Sipe
Construction, Inspection and Monitoring Section
Division of Dam Safety

cc: Jennifer M. Kowalonek, P.E., Alfred Benesch & Company

Jennifer Hepler, Manager
Municipal Authority of the Borough of Shenandoah

- 3 -

February 13, 2020

bcc: Pamela Kania, NERO, Dam Safety and Technical Services Section (OAIR sent inter-office)

Kreider
Sipe
File (54-008)
Reading File

JAS:sp

**JENNIFER M KOWALONEK PE
ALFRED BENESCH & COMPANY
PO BOX 1090
POTTSVILLE PA 17901**



February 13, 2020

Jennifer Hepler, Manager
Municipal Authority of the
Borough of Shenandoah
P.O. Box 110
Shenandoah, PA 17976

Re: 2019 Annual Inspection Report
DEP File No. D54-095
Ringtown No. 6 Dam
Union Township, Schuylkill County

Dear Ms. Hepler:

The 2019 Annual Inspection Report for Ringtown No. 6 Dam was submitted by Alfred Benesch & Company on December 18, 2019. We thank the Municipal Authority of the Borough of Shenandoah (Authority) for its cooperation with the Department of Environmental Protection, Division of Dam Safety (Department) and for conducting the 2019 Annual Inspection.

We have reviewed the inspection report and concur with many of the recommendations explained in it. The Authority should review these recommendations with its engineer and implement any necessary maintenance and repairs. Please be advised that repairs, other than minor maintenance, will likely require written approval from the Department prior to performing any work. Minor maintenance includes activities such as vegetation and debris removal, filling of animal burrows, and patching or sealing of small areas. *The results of any repair or maintenance work should be documented by the Authority's engineer in the 2020 Annual Inspection Report.*

As mentioned in several of our previous letters, the spillway for the Ringtown Reservoir No.6 Dam is considered inadequate. The Department's rainfall study has been completed and the results can be found on the Department's website which will assist in evaluating the spillway capacity. As the Authority and its engineer evaluate solutions to address the spillway capacity, the Department requests that the design include the installation of a seepage collection and monitoring system for seepage along the downstream end of the spillway.

The Department acknowledged receipt of the January 23, 2019 letter, which outlines a schedule to address the outstanding issues at all the Authority's dams. The schedule indicates that the Authority would have completed the design and construction of the seepage weir along the downstream end of the spillway by December 2019 for this dam. According to our records these deadlines have not been met. The Authority must follow the deadlines as outlined in the approved schedule to bring the dams into compliance.

If the Authority or its engineer has any questions regarding this letter, please contact me at 717.772.5956.

Sincerely,

A handwritten signature in black ink that reads "Joel A. Sipe".

Joel A. Sipe
Construction, Inspection and Monitoring Section
Division of Dam Safety

cc: Jennifer M. Kowalonek, P.E., Alfred Benesch & Company