

EXHIBIT O3



pennsylvania

**DEPARTMENT OF ENVIRONMENTAL
PROTECTION**

Southwest Regional Office

October 29, 2020

**Patrick Burdine, Superintendent
Dept. of Public Works
City of Beaver Falls
715 Fifteenth Street
Beaver Falls, PA 15010**

**Re: Corrective Action Plan
City of Beaver Falls
Beaver County**

Dear Mr. Burdine:

We hereby approve the Corrective Action Plan (CAP) submitted by the City of Beaver Falls on September 10, 2020. Progress reports (two copies) should be submitted to the Department every six months, and reports are due by July 31 and January 31 of each year. The first Progress Report is due July 31, 2020.

The City should take all necessary actions to prevent unpermitted discharges, basement flooding, and the associated public health hazards. At all times, including while the CAP is in effect, the City remains responsible for all violations of the Clean Streams Law and is liable for the civil penalties provided for such violations. Bypassing and basement flooding are illegal discharges. Enforcement action may be warranted if the approved schedule is not followed, or if conditions indicate that such action is necessary to protect the environment or public health.

The City is responsible for administering the tap control plan, approved as part of this CAP, in accordance with the requirements of Chapter 94 of the Rules and Regulations. Remember that additional flows are not permitted to areas with unresolved basement flooding. Also, the City's ability to allocate approved annual connections is contingent on adhering to the schedule in the approved CAP. If the schedule is not being met, the Department may rescind the approval to grant new connections.

Please be aware that requests for CAP revisions will be expected by this Department if the examination of the system shows that additional remedial work is needed, that is not known now. Please notify us immediately when this becomes evident, so we may approve CAP extensions.

The City shall submit an Annual Tap Control Plan to the Department by January 31 each year until such time as the CAP is terminated. If unused during the calendar year in which they were awarded, taps expire at the end of the calendar year.

If you have any questions regarding this letter, please contact David Roote of my staff at droote@pa.gov or 412-442-4045.

Sincerely,

Christopher J Kriley

Christopher J. Kriley, P.E.
Program Manager
Clean Water Program
Southwest Region

Enclosure



CITY OF BEAVER FALLS

DEPARTMENT OF PUBLIC WORKS

715 FIFTEENTH STREET ♦ BEAVER FALLS, PA 15010

(724) 843-7191 ♦ FAX (724) 843-7191

WWW.BEAVERFALLSPA.ORG

August 18, 2020

Mr. David J. Roote
PA Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Re: City of Beaver Falls, Beaver County
Corrective Action Plan

Dear Mr. Roote:

The following correspondence is in response to the letter dated June 22, 2020 sent by you and the PA Department of Environmental Protection. The City of Beaver Falls was aware of (2) two incidents in (2) two different areas of the City causing hydraulic overloads due to excessive wastewater flow. The first one took place in 2019. At that time, the Beaver Falls Public Works Department received a complaint from (2) two residents in the 2400 block of 6th Avenue in the City. Both residents complained of basement flooding during heavy rain events. After investigation, the Beaver Falls Public Works Department concluded that the basement flooding was being caused by excessive wastewater flows coming from neighboring communities during heavy rain events. The City contracted a certified plumber to install back flow preventers in the basements of the (2) two residences that were affected. Since the back flow preventers have been in place, there have been numerous heavy rain events and neither residence have had any basement flooding issues even though there is still hydraulic overloads due to excessive wastewater flows coming from the neighboring communities. The second incident occurred in 2020. Once again the Public Works Department received a complaint about basement flooding during a heavy rain event. This time it was in the 2200 block of 9th Avenue. The Public Works Department determined that the basement flooding was caused by excessive wastewater flow from another neighboring community during a heavy rain event. The City again contracted a certified plumber to install a back flow preventer in the residence. Since the installation, there have been many heavy rain events, but the residents basement remains dry. The City cannot control the excessive wastewater flow during heavy rain events coming from neighboring communities. With that being said, the City of Beaver Falls is not granting any new taps on any City lines that experience hydraulic overload due to excessive wastewater flow coming from neighboring communities. Furthermore, effective September 1, 2020, the City of Beaver Falls Public Works Department, as part of the City's Corrective Action Plan, will begin a scheduled cleaning and inspection program of the City's sanitary system. The goals of the plan are simple, eliminate excessive infiltration and inflow, minimize sewer overflows, disruption of service, unnecessary damage to private and public property, provide adequate capacity at peak flow with reliable service and protect

the environment during the whole process. As far as a timeline for completion of this plan, there is none due to the fact that it will be ongoing and develop into a preventive maintenance plan. I am confident that the plan that I have presented will meet with you and your departments approval.

Sincerely,

Patrick M. Burdine
Superintendent, City of Beaver Falls Department of Public Works



CITY OF BEAVER FALLS

DEPARTMENT OF PUBLIC WORKS

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The City of Beaver Falls' Corrective Action Plan

1. System Jetting and Inspecting

The BFDPW will jet the City's sanitary lines using their jet/vac truck. The jetting schedule will be broken up into the (5) five areas that make up the City of Beaver Falls. Beginning in the spring of 2021, presumably after the winter weather season has ended, the BFDPW will begin this line jetting schedule, the BFDPW will also deploy their cctv system when needed in the inspection process. Semi annual progress reports will be sent to PA DEP.

2. Eliminating of Roof Drain Connection to the System

The BFDPW will begin in the spring 2021, a visual, dye or smoke test inspection schedule of City residences and commercial properties roof drain systems to ensure that they are not connected to the City's sanitary system. Semi annual progress reports will be sent to PA DEP.

3. Updating the City of Beaver Falls Sanitary Sewer System Mapping

The BFDPW will begin in the late fall of 2020 to confirm that its maps of the City's sanitary sewer system are up to date and correct. This will include manhole numbering, flow direction, pipe size and outside communities connections to the City's sanitary system.

CORRECTIVE ACTION PLAN SCHEDULE AND PROGRESS REPORT

Municipality City of Beaver Falls
 County Beaver

REPORTING PERIOD
 FROM Jan 2021 TO Jun 2021

Task Description	Proposed Start Date	Actual Start Date	Required Completion Date	Actual Completion Date	Percent of Project Complete	Other Comments
1. System Jetting and Inspecting	Ongoing	Jun 2021	Mar 2026			
2. Eliminating Roof Drain Connections	Ongoing	Jun 2021	Mar 2026			
3. Updating of Sanitary Mapping	Ongoing	Jan 2021	Fall 2021			

TAP ALLOCATION FOR THIS YEAR 0

TAPS UTILIZED THIS REPORTING PERIOD 0

Based on the above information, are you in compliance with the approved schedule?

Yes X No If no, attach explanation.

Engineer TJ/MA 6/16/2021
 (Signature/Date)

Municipal Official [Signature] BFDPW Superintendent 6-16-2021
 (Signature/Title/Date)

CORRECTIVE ACTION PLAN SCHEDULE AND PROGRESS REPORT

Municipality City of Beaver Falls
 County Beaver

REPORTING PERIOD
 FROM Jun 2021 TO Dec 2021

Task Description	Proposed Start Date	Actual Start Date	Required Completion Date	Actual Completion Date	Percent of Project Complete	Other Comments
1. System Jetting and Inspecting	Ongoing	Jun 2021	Mar 2026			
2. Eliminating Roof Drain Connections	Ongoing	Jun 2021	Mar 2021			
3. Updating of Sanitary Mapping				Oct 2021		

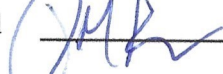
TAP ALLOCATION FOR THIS YEAR 0

TAPS UTILIZED THIS REPORTING PERIOD 0

Based on the above information, are you in compliance with the approved schedule?

Yes X No If no, attach explanation.

Engineer  12.17.2021
 (Signature/Date)

Municipal Official  BFDPW Superintendent 12.17.2021
 (Signature/Title/Date)

CORRECTIVE ACTION PLAN SCHEDULE AND PROGRESS REPORT

Municipality City of Beaver Falls

REPORTING PERIOD

County Beaver

FROM Jan 2022 TO Jun 2022

Task Description	Proposed Start Date	Actual Start Date	Required Completion Date	Actual Completion Date	Percent of Project Complete	Other Comments
1. System Jetting and Inspecting	Ongoing	Jun 2021	Mar 2026		20%	
2. Eliminating Roof Drain Connections	Ongoing	Jun 2021	Mar 2026		20%	
3. Updating of Sanitary Mapping					100%	

TAP ALLOCATION FOR THIS YEAR 0

TAPS UTILIZED THIS REPORTING PERIOD 0

Based on the above information, are you in compliance with the approved schedule?

Yes x No

If no, attach explanation,

[Signature] 6-1-2022
(Signature/Date)

[Signature] BFDPW Superintendent 6-1-2022
(Signature/Title/Date)

Engineer

Municipal Official

WQA-38B (Rev. 9/26/03)

Municipality City of Beaver Falls

CORRECTIVE ACTION PLAN SCHEDULE AND PROGRESS REPORT

REPORTING PERIOD

County Beaver

FROM Jun 2022

TO Dec 2022

Task Description	Proposed Start Date	Actual Start Date	Required Completion Date	Actual Completion Date	Percent of Project Complete	Other Comments
1. System Jetting and Inspecting	Ongoing	Jun 2021	Mar 2026		25%	
2. Eliminating Roof Drain Connections	Ongoing	Jun 2021	Mar 2026		25%	
3. Updating of Sanitary Mapping					100%	
TAP ALLOCATION FOR THIS YEAR	0					
						TAPS UTILIZED THIS REPORTING PERIOD 0

Based on the above information, are you in compliance with the approved schedule?

Yes No

If no, attach explanation,

T. J. [Signature] 12.5.2022
(Signature/Date)

[Signature] BFDPW Superintendent 12.5.2022
(Signature/Title/Date)