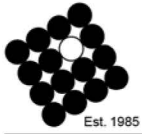


EXHIBIT O7



Lennon, Smith, Souleret Engineering, Inc.

Civil Engineers and Surveyors

846 Fourth Avenue, Coraopolis, PA 15108
(412) 264-4400 • (412) 264-1200 Fax

Managing Principals:
Kevin A. Brett, P.E.
Ned Mitrovich, P.E.
Jason E. Stanton, P.E.

September 22, 2020

S. O. No. 503-005

VIA EMAIL ONLY
(droote@pa.gov)

Mr. David J. Roote
Water Quality Specialist Supervisor
Clean Water Program
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222-4745

**Subject: White Township
Corrective Action Plan (CAP)**

Dear Mr. Roote:

Please accept this letter and the attached Corrective Action Plan (CAP) as a response to the Pennsylvania Department of Environmental Protection's (PADEP's) letter dated June 22, 2020.

White Township has engaged Lennon, Smith Souleret Engineering, Inc. (LSSE) to assist in quantifying the magnitude of the "excessive wastewater flows" in the White Township sewer system tributary to the City of Beaver Falls conveyance system as reported in your referenced letter. Please see the following discussion and attached schedule briefly outlining the proposed corrective action plan.

The referenced letter indicates that Beaver Falls has conducted a flow monitoring program in their system to isolate flow contributions. White Township was not advised that there was an overload in the Beaver Falls conveyance system, the location of said overload, that a flow monitoring program was to be conducted or was underway, and has not received the results of the program identifying the White Township flow contribution.

Despite the lack of information and problem statement from Beaver Falls or the Department, White Township nonetheless proposes the following:

1. **Mapping Update**

White Township will initiate a mapping update of their existing base map. Scope of Work includes two days of field work to confirm connectivity with adjacent sewer systems, identify points of connection, and confirm basic sewer geometry. The existing map will be input into a GIS database, however, surveyed locations of manhole structures is not proposed at this time.

2. **Dye Testing Ordinance**

White Township will prepare and consider adoption of a Dye Testing Ordinance.

3. **Flow Monitoring Program:**

This program will consist of approximately four strategically placed flow monitors at the points of connection to the Beaver Falls system and to the Patterson Township system. These connections will be verified by System Mapping and are generally located along Steffin Hill Road. Data from the existing Beaver Falls permanent meter site generally at the end of 30th Street is anticipated to be utilized for this point of connection to the Beaver Falls system. The purpose of the flow monitoring program is to initiate an understanding of system response during precipitation events. The monitoring program is planned for 6 months beginning in January 2021 and concluding in the June 2021.

4. **Night-Time Flow Isolation (NFI) Measurements:**

Flow isolation studies screening/monitoring on the White Township sanitary sewer system, consisting of approximately 15 key manholes in the sanitary sewer system tributary to the Beaver Falls system, are planned for Spring 2021 and performed between the hours of 12:00 a.m. and 5:00 a.m., during which time it is presumed that the domestic sewage component of the wastewater is minimal, and therefore the measured flow essentially represents system groundwater infiltration. Flow isolation studies typically are performed during periods of high groundwater when sustained infiltration rates are elevated. Typically, in western Pennsylvania, the predominant months for these elevated groundwater conditions are February through April. Also, the measurements are not planned to be done during or immediately after precipitation events so as not to include any potential direct inflow sources. Two rounds of measurements are proposed.

5. **System Evaluation:**

After the conclusion of the Flow Monitoring Program and Night-Time Flow Isolation (NFI) Measurement, the results will be evaluated to determine which areas of White Township's sewer system require additional investigation, if necessary. This additional programming may include

Mr. David J. Roote
Water Quality Specialist Supervisor
Clean Water Program
Pennsylvania Department of Environmental Protection
September 22, 2020
Page 3

additional nighttime flow isolation measurements, CCTV, smoke testing, dye testing, and/or sewer line repairs identified during the additional evaluations. A schedule for this additional evaluation, if necessary, will be provided with the January 2022 progress report and tap request. Any additional evaluations will likely be split into approximately four separate areas and work completed over a period of several years.

6. Tap Control Plan:

As directed, it is our understanding that White Township has restricted new connections to the system. In consideration of White Township's commitment to this Corrective Action Plan, White Township is hereby requesting a tap allocation of 10 taps for the balance of 2020 and 2021. Subsequent tap allocations will be requested annually.

During the term of this Corrective Action Plan, White Township or its designee will report to PADEP on a semiannual basis. This report will be formatted very similar to the schedule presented herein with progress being reported at the end of January and the end of July for each year under the CAP.

In summary, we trust that this Corrective Action Plan addresses the Department's requirements identified in the June 22, 2020 letter and request your approval of the plan.

With submittal of this CAP, White Township would also like to request that PADEP and/or the City of Beaver Falls hold a joint sewer users group meeting such that the municipalities tributary to the City's system could be briefed as to the conditions which exist in the Beaver Falls system that are necessitating the CAP. This venue (Joint Sewer User's Group) was once routinely held and administered by the City of Beaver Falls. This meeting would be a benefit to all parties to understand the issue more fully as well as justify to the tributary municipalities / authorities that CAP efforts should be included in 2021 budgets accordingly.

Should you have any questions, please contact Emily Palmer, P.E or the undersigned.

Sincerely,



/for

Lawrence J. Lennon, Jr., P.E.

LJLJr/vcl

Attachments

cc/att: White Township (whitetwp@comcast.net)

**WHITE TOWNSHIP
SANITARY SEWER SYSTEM CORRECTIVE ACTION PLAN
BEAVER FALLS SERVICE AREA**

Prepared August 2020

Item No.	Task Description	Target Start Date	Target Completion Date	Notes
1	Consideration of a Township Dye Test Ordinance	October 2020	June 1, 2021	
2	System Mapping	Fall 2020	January 2021	Two days of field work to confirm connectivity with adjacent sewer systems, identify points of connection,
3	Flow Monitoring Program	January 2021	June 2021	
4	Semi-annual Progress Report to DEP	January 1, 2021	January 31, 2021	
5	Night-Time Flow Isolation (NFI) Measurements	Spring 2021	Spring 2021	Two Rounds of Measurements, Groundwater Conditions Dependent
6	Semi-annual Progress Report to DEP	July 1, 2021	July 31, 2021	
7	System Evaluation	Spring 2021	December 31, 2021	
9	Semi-annual Progress Report to DEP	January 1, 2022	January 31, 2022	
10	Additional System Evaluations, if necessary, which may include: Additional NFI measurements, Smoke and Dye Testing, CCTV, and/or defect repair.	TBD	TBD	

**WHITE TOWNSHIP
SANITARY SEWER SYSTEM CORRECTIVE ACTION PLAN
BEAVER FALLS SERVICE AREA**

Prepared August 2020

Item No.	Task Description	Target Start Date	Target Completion Date	Notes
1	Consideration of a Township Dye Test Ordinance	October 2020	June 1, 2021	
2	System Mapping	Fall 2020	January 2021	Two days of field work to confirm connectivity with adjacent sewer systems, identify points of connection,
3	Flow Monitoring Program	January 2021	June 2021	
4	Semi-annual Progress Report to DEP	January 1, 2021	January 31, 2021	
5	Night-Time Flow Isolation (NFI) Measurements	Spring 2021	Spring 2021	Two Rounds of Measurements, Groundwater Conditions Dependent
6	Semi-annual Progress Report to DEP	July 1, 2021	July 31, 2021	
7	System Evaluation	Spring 2021	December 31, 2021	
9	Semi-annual Progress Report to DEP	January 1, 2022	January 31, 2022	
10	Additional System Evaluations, if necessary, which may include: Additional NFI measurements, Smoke and Dye Testing, CCTV, and/or defect repair.	TBD	TBD	

June 22, 2020

Susan DeMeio, Township Supervisor Chairperson
White Township
2511 13th Ave
Beaver Falls PA 15010

Re: Sewer System Overload Condition
White Township
Beaver County

Dear Ms. DeMeio:

Recently this Department received information concerning excessive wastewater flows to the City of Beaver Falls system during precipitation events. These high flows create hydraulic overloads in the conveyance system there prior to reaching the treatment plant. Beaver Falls has implemented a flow monitoring program to determine the source(s) of these high flows by placing meters in locations that isolate the flow contributions of each connected community, with certain exceptions. Because of this, as White Township is one of these communities, we are requesting the following from White Township:

1. Submit a written Corrective Action Plan (CAP) setting forth the actions to be taken to reduce the overload and provide the needed capacity to achieve compliance to the Department within 90 days of receipt of this letter. The plan must also include a program for a limitation on and control of new connections to the overloaded sewerage facilities and a schedule showing the dates each step toward compliance will be completed.
2. Restrict new connections to the sewer system tributary to the overloaded sewerage facilities to those connections fitting the exceptions described in 25 Pa. Code §§ 94.55, 94.56 and 94.57 until the requested plan and schedule is approved by DEP.

Section 7 of the Sewage Facilities Act, as amended by Act 149, does not provide for planning exemptions when sewage facilities have an existing hydraulic or organic overload or projected five-year overload.

Enclosed you will find a table form of the semiannual progress reports required for submission in January and June of each year of the plan implementation. Please use this as a template for noting completion percentages and include it with your reports.

The Township 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

and any other unpermitted discharges. Also, the Township'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.

The Township 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.

When you have developed a plan and schedule or if you have any questions about this notice, please call me at 412-442-4045 or email me at Droote@pa.gov.

Sincerely,

David J. Roote

David J. Roote
Water Quality Specialist Supervisor
Clean Water Program

Enclosures



Southwest Regional Office

October 29, 2020

Susan DeMeio, Township Supervisor Chairperson
White Township
2511 13th Ave
Beaver Falls PA 15010

Re: Corrective Action Plan
White Township
Beaver County

Dear Ms. DeMeio:

We hereby approve the Corrective Action Plan (CAP) submitted by Lennon, Smith, Souleret Engineering, Inc. on behalf of White Township on September 22, 2020. Progress reports (two copies) should be submitted to the Department every six months using the enclosed reporting form. Please add the columns for "Required Completion Date" and "Percent Complete" to this form. Reports are due by July 31 and January 31 of each year. The first Progress Report is due July 31, 2020.

This letter includes approval for ten (10) taps requested for the remainder of 2020, and also for 2021. Please remember that the City of Beaver Falls must affirm that adequate capacity in their system is available for each tap request submitted to this Department for approval.

The Township 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 Township 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 Township 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 Township'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 Township 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 droot@pa.gov or 412-442-4045.

Sincerely,

Christopher J Kriley

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

Enclosure