

**Application of Pennsylvania-American Water Company for the Acquisition  
of the Wastewater Collection, Conveyance and Treatment System  
Owned and Operated by Towamencin Township and Towamencin Municipal Authority  
(collectively “Towamencin”)**

**Docket No. A-2023-3039900**

**66 Pa. C.S. § 1329**

**Application Filing Checklist – Water/Wastewater**

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.<sup>1</sup>

**RESPONSE:** g. PAWC'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. We have also improved the compliance records of acquired systems during this timeframe by improving system management and investing in infrastructure. Below is a list of drinking water and wastewater 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.

**a. Royersford Water System Violations:**

1. 2019 - Drinking water inspection violation due to damaged chlorine and caustic soda feed pipes into the clear well.
2. 2019 - Drinking water monitoring violation Shady Lane Plant for failure to conduct required compliance sampling and analysis in accordance with analytical techniques.
3. 2022 – A Consent Assessment of Civil Penalty was received for the unauthorized discharge of partially treated drinking water after a sedimentation basin overflowed due to a mechanical failure in the waste holding tank. Also included were violations for failure to monitor and permit exceedances of the NPDES permit from 2018 through 2022.

**b. Norristown Water System Violations**

1. 2022 – A Consent Assessment of Civil Penalty was received for the unauthorized discharge of drinking water residuals after a sludge transfer switch was accidentally left in the “on”

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<sup>1</sup> Regarding 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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position in 2021. Also included in the violation were effluent exceedances which occurred after a recycle pump in the wastewater handling system was damaged during a flooding event in 2021.

**c. Glen Alsace Water System Violations:**

1. 2018 - Drinking water monitoring violation for failing to collect a 6- year annual uranium sample.
2. 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.

**d. Exeter Wastewater System**

1. 2020 – Two NOV’s were received for sanitary sewer overflows. Corrective actions were immediately taken.
2. 2022 – An NOV was received for a sanitary sewer overflow when a digester overflowed approximately 10 gallons of foam. Corrective actions were immediately taken.
3. 2023 – A Consent Assessment of Civil Penalty was received in 2023 which identified permit exceedances from 2019 through 2022. The treatment plant is currently undergoing upgrades as well as working with a local industry to install pretreatment to minimize the effects on the treatment plant.