Kruti Patel
Phone: (215) 972-7735
Fax: (215) 972-7725
Kruti.patel@saul.com
www.saul.com

SAUL EWING
LLP

October 15, 2024

Via E-File
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Dear Secretary Chiavetta,

Enclosed please find Aqua Pennsylvania Wastewater, Inc.'s ("Aqua") Initial Status Report to the Pennsylvania Public Utility Commission (the "Commission") in accordance with Aqua's Receivership duties for Deer Haven, LLC (Sewer) established by the Commission's *Ex Parte* Order dated August 15, 2024. If you have any questions, please do not hesitate to reach out.

Sincerely,

Kruti Patel

Encls.
cc: Service List

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Deer Haven, LLC Requesting an *Ex Parte* Emergency Order Allowing Aqua Pennsylvania, Inc. to Act as a Receiver to Operate the Deer Haven Water and Wastewater Systems	**:**	**Docket No. P-2024-3050545**

CERTIFICATE OF SERVICE

I hereby certify that I have, this 15th day of October, 2024, served a true and correct copy of Aqua Pennsylvania Wastewater, Inc.'s Initial Status Report, upon the persons and in the manner indicated below:

VIA E-FILE AND ELECTRONIC MAIL

PA PUC
E-file Only
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105
Rosemary Chiavetta, Secretary
rchiavetta@pa.gov

E-mail
Paul Diskin, Director
Daniel Searfoorce
John Van Zant
Sean Donnelly
Bureau of Technical Utility Services
pdiskin@pa.gov
dsearfoorce@pa.gov
jvanzant@pa.gov
sdonnelly@pa.gov

DEER HAVEN
Adeolu A. Bakare, Esq.
McNees Wallace & Nurick LLC
abakare@mcneeslaw.com
Counsel for Deer Haven, LLC

I&E
Allison Kaster, Esquire
Bureau of Investigation and Enforcement
akaster@pa.gov

OCA
Melanie Joy El Atieh, Esq.
Barrett C. Sheridan, Esq.
Office of Consumer Advocate
melatieh@paoca.org
bsheridan@paoca.org

OSBA
Steven C. Gray, Esquire
Office of Small Business Advocate
sgray@pa.gov

Via E-mail
Alexander Stahl, Esq.
Aqua Pennsylvania, Inc.
762 West Lancaster Avenue
Bryn Mawr, PA 19010
astahl@aquaamerica.com

/s/ Kruti B. Patel
Kruti B. Patel, Esq.
Courtney L. Schultz, Esq.
Saul Ewing LLP
1500 Market Street, 38th Floor
Philadelphia, PA 19102
(215) 972-7735
Kruti.patel@saul.com
Courtney.schultz@saul.com
Counsel for Aqua Pennsylvania Wastewater, Inc.

INITIAL STATUS REPORT TO THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

DEER HAVEN, LLC (SEWER)

AQUA PENNSYLVANIA WASTEWATER, INC., AS RECEIVER

DOCKET NO. P-2024-3050549

Dated: October 15, 2024

A. BACKGROUND

On August 1, 2024, Deer Haven, LLC (Sewer) ("DH Sewer") filed a Petition requesting that the Pennsylvania Public Utility Commission ("PUC" or the "Commission") issue an *Ex Parte* Emergency Order Allowing Aqua Pennsylvania, Inc. to Act as a Receiver to Operate the Deer Haven Water and Sewer Systems.[1] The Commission issued a Secretarial Letter on August 7, 2024 denying DH Sewer's request for an *Ex Parte* Emergency Order. Aqua Pennsylvania, Inc. ("AP") filed a letter on August 13, regarding the Deer Haven, LLC (Water) ("DH Water") system, but noted that:

> Aqua would also note that while Aqua is aware the Commission denied Deer Haven's Petition for an *Ex Parte* Emergency Order to name Aqua Pennsylvania Wastewater, Inc. as the Receiver for the Wastewater System, Aqua understands that the operator is no longer performing operations oversight for the Wastewater System as of Saturday, August 10, 2024. Aqua is informing the Commission to ensure that operations oversight is restored as soon as possible to protect the customers of Deer Haven.[2]

Also on August 13, 2024 DH Sewer filed a response to the Commission's August 7, 2024 Secretarial Letter wherein DH Sewer stated that its current operator was terminating service effective August 9, 2024 due to past due balances owed.

On August 15, 2024, the Commission issued an *Ex Parte* Emergency Order naming AP as Receiver of the DH Sewer system.[3] Although the Commission named AP as the Receiver for the DH Sewer system, Aqua Pennsylvania Wastewater, Inc. ("APW") is acting as the Receiver as DH Sewer is a wastewater system (AP and APW shall be referred to as "Aqua" collectively).

The DH Sewer system serves approximately 62 customers in Palmyra Township, Pike County, Pennsylvania. The DH Sewer system abuts Lake Wallenpaupack and is near several of AP's water systems including Tanglewood North and Tanglewood Lakes. The Receivership Order was ratified by the Commission through its Ratification Order entered on August 22, 2024. Aqua was directed to assume its Receivership role on August 15, 2024. Included within the Commission's Receivership Order, the Company was directed to "[s]ubmit an initial status report to the Commission within 60 days of assuming operations and then quarterly thereafter to detail any relevant updates pursuant to duties and responsibilities assigned through receivership."[4]

APW now submits its Initial Status Report ("Status Report") on the operations of DH Sewer as directed by the Commission.

---

[1] *Petition of Deer Haven, LLC Requesting an Ex Parte Emergency Order Allowing Aqua Pennsylvania, Inc. to Act as a Receiver to Operate the Deer Haven Water and Sewer Systems*, Docket No. P-2024-3050549. ("DH Petition").
[2] Letter of AP Re: DH Petition, Docket No. P-2024-3050545 (Aug. 13, 2024).
[3] DH Petition, Docket No. P-2024-3050549, *Ex Parte* Emergency Order, Ordering Paragraph No. 5 (Aug. 15, 2024) ("Receivership Order").
[4] *Id.* Ordering Paragraph No. 5, Appendix A, Paragraph 1.o.

B. INITIAL STATUS REPORT

1. Receivership Order

The Commission directed that utility service serving the DH Sewer facilities be transferred to the Receiver.[5] Electric service was transferred and established in APW's name as Receiver in accordance with the Commission's Receivership Order.

The Commission directed that DH Sewer preserve all hard copy or electronic records, files, bank statements, documents, papers, or any other materials related to the offering of utility water service, including records of all contracts, agreements loans, payments, and other arrangements with affiliated companies.[6]

The Commission directed that by August 15, 2024, DH Sewer turn over copies or originals of all books, records, accounts, and any other information, and all operations assets, including keys to locks securing facilities, buildings, and any other property, whether personal or real property, used and useful in the provision of utility water service to customers served by DH Sewer to the Receiver.[7] The Commission also directed that DH Sewer, including its owners and employees, provide full and unconditional cooperation with the orderly transition of operations, management, and oversight to the Receiver.[8]

2. Operations and Capital Expenditures

On August 15, 2024, Aqua began its Receivership duties for the DH Sewer system, and visited the wastewater treatment plant ("WWTP") facilities in the evening of August 15, 2024 to assess the state of operations of the DH Sewer system. On August 16, 2024, a full complement of Aqua personnel arrived onsite to begin a full assessment of the system and its operations. Aqua performed a walkthrough of the DH Sewer facilities and immediately was concerned with the lack of treatment occurring in the existing facilities. Aqua employees also identified as a concern the structural integrity of the WWTP building. Photographs of the DH Sewer facilities when Aqua came onsite are included with this Status Report as **Attachment A**.

Within the WWTP, Aqua found that only primary treatment was occurring in the treatment train as the second process train is unusable. Wastewater enters the aeration tank for primary treatment then moves to a clarifier to settle solids, then to the chlorine contact tank for disinfection and finally discharge to the lake. Aqua notes that aeration, a chloring pump, and DelPac for phosphorus removal were on and running upon Aqua's arrival. However, Aqua observed that there was essentially no biological activity in the aeration processes, minimal disinfection, and the partially treated wastewater was being discharged into Lake Wallenpaupack near a marina. This is in violation of the facility's NPDES permit. Aqua informed the Pennsylvania Department of Environmental Protection ("DEP") of this discharge. Aqua took wastewater composite samples

[5] *Id.* Ordering Paragraph No. 9.
[6] *Id.* Ordering Paragraph No. 10.
[7] *Id.* Ordering Paragraph No. 11 and 12.
[8] *Id.* Ordering Paragraph No. 13.

at the end of the chlorine contact tank to ensure a representative sample. The samples showed exceedances of Ammonia-Nitrogen, Total Phosphorus, and BOD. The sample results are included in this Status Report as **Attachment B**. Aqua met with the DEP on August 23, 2024, to discuss solutions to address the non-compliant discharge. It is important to note that DH Sewer was in the process of transferring its assets to PL Utilities, LLC ("PLU") at Docket No. A-2024-3049587 and A-2024-3049591. PLU had constructed a new WWTP that would accept flow from the DH Sewer system, but is not yet connected to the DH Sewer system, and is located approximately 1,000 feet away from the existing WWTP. A map showing these locations is included in this Status Report as **Attachment C**. Aqua's preference would be to connect the existing facilities to the new WWTP; however, the new WWTP is not owned by DH Sewer – it is owned by PLU. PLU has not shown interest in allowing such a connection to occur at this point in the proceeding therefore the new WWTP owned by PLU remains out of service.

Following Aqua's meeting with the DEP, Aqua had to obtain a third-party contractor to implement pumping and hauling of the wastewater coming into the DH Sewer WWTP to mitigate further discharge into Lake Wallenpaupack. However, high inflow and infiltration ("I&I") from heavy rains or snow melt may cause an overflow from the WWTP into the lake. This concern was reported to the DEP and if such circumstances occur, it will be reported to DEP. Aqua installed a new flow totalizer to measure flow totals and tank levels. Aqua has been continuing this pumping and hauling effort which requires, on average, at least one truckload per day at an average cost of $26,310 per month. Aqua is currently evaluating installing a membrane aerated biofilm reactor ("MABR") mobile treatment unit on-site to allow for continuous treatment without the need for pumping and hauling and to protect Aqua's employees and contractors from having to enter the unsafe WWTP structure as discussed below.

Regarding the WWTP structure itself, as can be seen in the photographs included as Attachment A, the WWTP structure had deteriorated and was non-operational. A section of the old WWTP structure appears to have collapsed years ago and a new area was erected over the collapsed structure without clearing the collapsed structure. This made access to plant equipment and walking around the facility unsafe. Aqua's concern was for the safety of its employees and contractors, and thereafter locked the WWTP structure and instructed all employees and contractors not to enter. To confirm Aqua's concerns, Aqua obtained a structural engineer to review the WWTP which was determined "Not Safe To Be Occupied". The structural engineer's email is included in this Status Report as **Attachment D**. Similar unsafe conditions were observed related to the electrical equipment which included panels with the front face removed and unsafe workmanship. In general, the facility's condition is poor, and has many safety hazards throughout. These conditions represent what appears to be years of poor maintenance and care to safety of the work areas.

Aqua established a website to provide information to customers concerning the DH Sewer system: https://www.aquawater.com/deerhaven.php. Aqua sent a letter to customers informing them that Aqua was now acting as Receiver of the DH Sewer system. The customer letter is included in this Status Report as **Attachment E**.

Aqua is developing a recommended capital plan for the DH Sewer system and will provide recommendations on capital improvements in a subsequent status report.[9]

As Aqua continues to operate the system to ensure compliance with the Receivership Order, Aqua will make improvements necessary to provide quality and reliable service. Aqua will have further information on operational issues in later reports.

3. Financial

The Receivership Order directed Aqua to establish the financial position of DH Sewer at the time Aqua assumed its Receivership role.[10] Aqua is working to establish the financial position of DH Sewer as of the start of Aqua's Receivership. Aqua will continue to track expenses and capital improvements related to the DH Sewer system through deferred accounting treatment via establishment of a regulatory asset in accordance with Aqua's Receivership duties.[11]

4. Initial Customer Billing

Aqua has implemented the existing rates of DH Sewer as set forth in DH Sewer's Supplement No. 5 to Deer Haven SEWER Company Tariff SEWER – Pa. P.U.C. No. 1, effective June 1, 2011, which is available on Aqua's website and the Deer Haven webpage discussed above. Aqua's initial billing of the DH Sewer customers were sent out in September 2024.

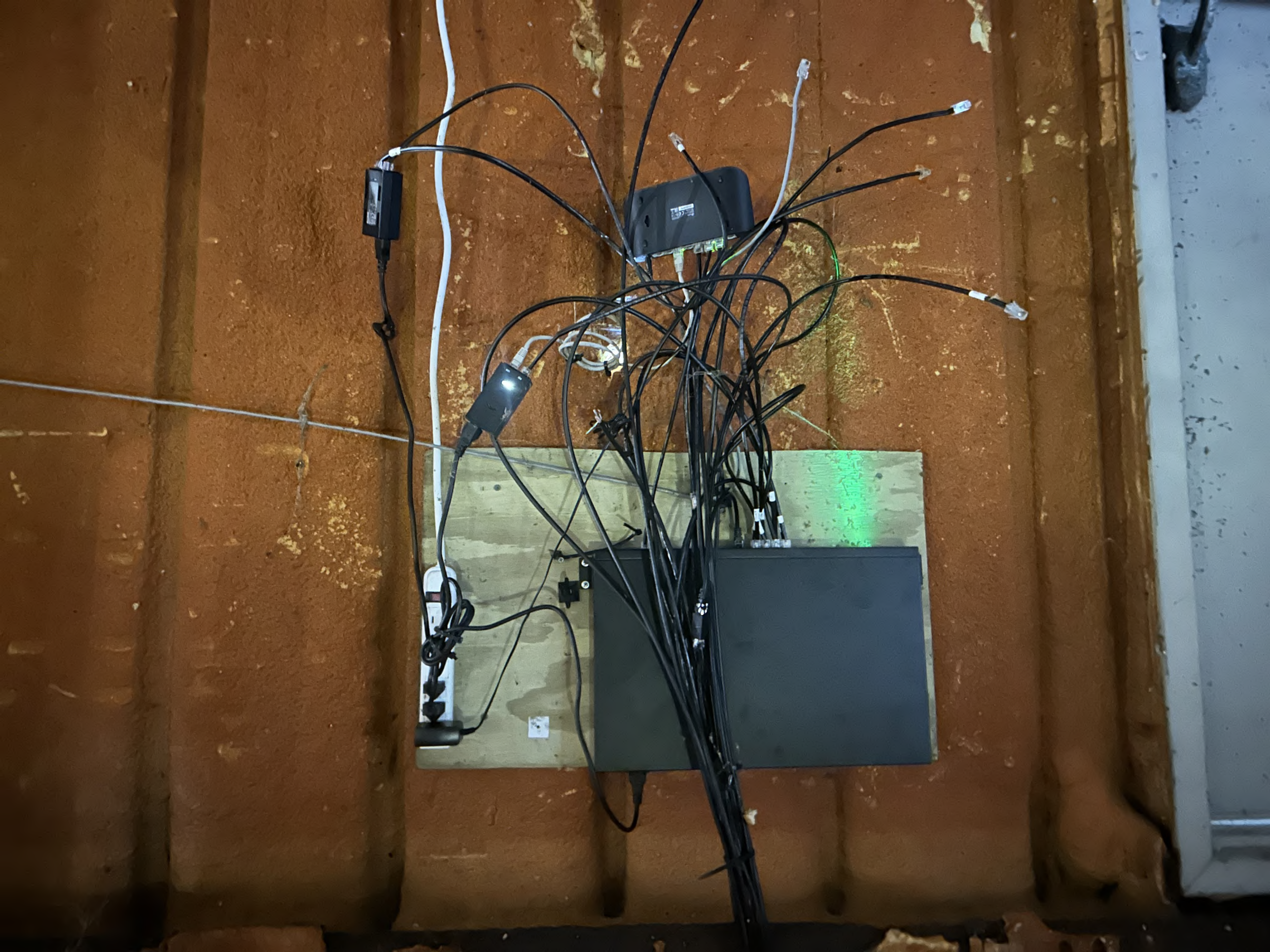
C. CONCLUSION

Aqua will continue to investigate the system's operations and financial status and will make necessary improvements to operate the DH Sewer system to ensure quality service to the DH Sewer customers for the period of its Receivership duties during the 529 proceeding. Aqua will provide an update to this Initial Status Report on or before January 13, 2025.

[9] *Id.* Ordering Paragraph 5, Appendix A, Paragraph 1.c.
[10] *Id.* Ordering Paragraph 5, Appendix A Paragraph 1.r.
[11] *Receivership Order*, Ordering Paragraph 5, Appendix A, Paragraphs 1.s and 2.b.

ATTACHMENT A


SCH40




03130


03150


13087

ATTACHMENT B

HAWKMTN LABS INC

201 West Clay Avenue / Hazle Township, PA 18202

PHONE (570) 455-6011 - FAX (570) 455-6321
www.hawkmtnlabs.com

Customer: Environmental Service Corp PA
9121 Valley View Drive
Clarks Summit, PA 18411

Ryan Detweiler

Report Date: 9/3/2024

Report Narrative

HawkMtn WO #: 2408-00362
Subject Line: Deer Haven Daily Effluent Analysis - 8/19/24

Any information provided by client (CLT) has not been performed by HML and is not within the HML scope of accreditation.

All solid samples are reported on "a dry weight" basis unless otherwise noted.

PA DEP 40-417
EPA PA00169

HAWKMTN LABS INC

201 West Clay Avenue / Hazle Township, PA 18202

PHONE (570) 455-6011 - FAX (570) 455-6321
www.hawkmtnlabs.com

Customer: Environmental Service Corp PA
9121 Valley View Drive
Clarks Summit, PA 18411

Report Date: 9/3/2024

Ryan Detweiler

Certificate of Analysis

Material Tested:	Non Potable Water			HawkMtn WO #:	2408-00362-001
Date Sampled:	08/19/2024	Time Sampled:	8:00	Sampler:	Client
Date Received:	08/19/2024			Sample Point ID:	Effluent Composite

Client Sample ID: Deer Haven Daily Effluent Composite

Analysis	Result	Dilution	Quant Limit	Method	Qual	Tech	Analysis Date & Time Start	End
Total Suspended Solids	25.0 mg/L	1	5	SM 2540 D		NR	8/20/24 12:19	
Ammonia-Nitrogen as N	4.66 mg/L	5	0.2	SM 4500-NH3 F		GW	8/26/24 13:54	
Phosphorus, Total	2.92 mg/L	5	0.1	SM 4500-P E		AM	8/21/24 14:59	
BOD, Carbonaceous	11.5 mg/L	1	6	SM 5210 B	B1	JS	8/19/24 15:45	8/24/24 9:45

Material Tested:	Non Potable Water			HawkMtn WO #:	2408-00362-002
Date Sampled:	08/19/2024	Time Sampled:	9:50	Sampler:	Client
Date Received:	08/19/2024			Sample Point ID:	Effluent Fecal Grab

Client Sample ID: Deer Haven Daily Effluent Fecal Grab

Analysis	Result	Dilution	Quant Limit	Method	Qual	Tech	Analysis Date & Time Start	End
Fecal Coliform	8.5 MPN/100 mL	1	1.0	Colilert 18		MPM	8/19/24 15:15	8/20/24 13:15

These results relate only to the sample noted above.

Jeffrey Gittleman, Laboratory Director

Nicholas Lynn, Technical Director

B1 = Target analyte was measured in the laboratory blank at or above the quantitation limit.

PA DEP 40-417
EPA PA00169

Work Order #: **2408-00362** Purchase Order:
Site Name: **Environmental Service Corp PA**
Contact: **Ryan.Detweiler@esc-pa.com**

Chain of Custody & Analysis Record
HawkMtn Labs, Inc.
201 West Clay Ave, Hazle Township, PA 18202
Ph (570) 455-6011 Fax (570) 455-6321

Pick Up Date: **8/19/2024**
Printed By: AHP
Bottles made by: JV

Approved By: JVR
Checked By: KW

Composite
Start Date: 8-19-24 Time: 00:00
End Date: 8-19-24 Time: 08:00

Grab
Date: 8-19-24 Time: 0950
Date: Time:
Date: Time:
Date: Time:

Smp#	Bottle	Preservative	Rcvd	Smp#	Bottle	Preservative	Rcvd
001	Plastic 1L	Unpreserved	☑	001	Plastic 250mL	H2SO4	☑
001	Plastic 1L, TSS	Unpreserved	☑	002	Sterilized, Plastic 100mL	Na2S2O3, Fecal Co	☑

Smp #	Smp Site	Matrix/ Smp Type	Tests			Temp Upon Receipt	Sample Date	Sample Time	Field pH	Field Cl	Field Temp
001	Deer Haven Daily Effluent Composite	Non Potable Wa	WA-CBOD WA-AM-NT	WA-TSS	WA-P-T	2.6 °C	8-19-24	0950		mg/L	°C
002	Deer Haven Daily Effluent Fecal Grab	Non Potable Wa	WW-TF-C18			2.1 °C	8-19-24	0950		mg/L	°C

Receipt Info: Recieved on ice? (Y) / N COC intact and complete? (Y) / N Adquate samples? (Y) / N Completed by:
Samples intact? (Y) / N Correct containers? (Y) / N Volatiles: Headspace present? ~~Y~~ / ~~N~~ Samples/COC/Analysis agree? (Y) / N AHP

Sampled By: William J. Dixon

Field Meter ID:
Notes:

		Date	Time
RELINQUISHED BY:		8-19-24	1105
RECEIVED BY:		8/19/24	1328
RELINQUISHED BY:			
RECEIVED AT LAB:		8/19/24	1430
LOGGED IN AT LAB:		8-19-24	1546

HAWKMTN LABS INC

201 West Clay Avenue / Hazle Township, PA 18202

PHONE (570) 455-6011 - FAX (570) 455-6321
www.hawkmtnlabs.com

Customer: Environmental Service Corp PA
9121 Valley View Drive
Clarks Summit, PA 18411

Ryan Detweiler

Report Date: 9/3/2024

Report Narrative

HawkMtn WO #: 2408-00369
Subject Line: Deer Haven Daily Effluent Analysis - 8/20/24

Any information provided by client (CLT) has not been performed by HML and is not within the HML scope of accreditation.

All solid samples are reported on "a dry weight" basis unless otherwise noted.

The test results meet the requirements of 25 PA Code and Chapter 252, except where noted.

PA DEP 40-417
EPA PA00169

HAWKMTN LABS INC

201 West Clay Avenue / Hazle Township, PA 18202

PHONE (570) 455-6011 - FAX (570) 455-6321
www.hawkmtnlabs.com

Customer: Environmental Service Corp PA
9121 Valley View Drive
Clarks Summit, PA 18411

Report Date: 9/3/2024

Ryan Detweiler

Certificate of Analysis

Material Tested:	Non Potable Water			HawkMtn WO #:	2408-00369-001
Date Sampled:	08/20/2024	Time Sampled:	8:00	Sampler:	Client
Date Received:	08/20/2024			Sample Point ID:	Effluent Composite

Client Sample ID: Deer Haven Daily Effluent Composite

Analysis	Result	Dilution	Quant Limit	Method	Qual	Tech	Analysis Date & Time Start	End
Total Suspended Solids	18.7 mg/L	1	5	SM 2540 D		NR	8/21/24 10:27	
Ammonia-Nitrogen as N	5.86 mg/L	1	0.2	SM 4500-NH3 F		GW	8/26/24 13:54	
Phosphorus, Total	2.65 mg/L	5	0.1	SM 4500-P E		AM	8/26/24 15:32	
BOD, Carbonaceous	14.4 mg/L	1	6	SM 5210 B		JS	8/21/24 11:00	8/26/24 8:04

Material Tested:	Non Potable Water			HawkMtn WO #:	2408-00369-002
Date Sampled:	08/20/2024	Time Sampled:	9:45	Sampler:	Client
Date Received:	08/20/2024			Sample Point ID:	Effluent Fecal Grab

Client Sample ID: Deer Haven Daily Effluent Fecal Grab

Analysis	Result	Dilution	Quant Limit	Method	Qual	Tech	Analysis Date & Time Start	End
Fecal Coliform	7.5 MPN/100 mL	1	1.0	Colilert 18		MPM	8/20/24 14:20	8/21/24 12:20

These results relate only to the sample noted above.

Jeffrey Gittleman, Laboratory Director

Nicholas Lynn, Technical Director

PA DEP 40-417
EPA PA00169

Work Order #: **2408-00369** Purchase Order:
Site Name: **Environmental Service Corp PA**
Contact: **Ryan.Detweiler@esc-pa.com**

Chain of Custody & Analysis Record
HawkMtn Labs, Inc.
201 West Clay Ave, Hazle Township, PA 18202
Ph.(570) 455-6011 Fax (570) 455-6321

Pick Up Date: **8/23/2024**
Printed By: AP
Bottles made by: JV

Page 1 of 1
Approved By:
Checked By:

Composite
Start Date: 8-20-24 Time: 00:00
End Date: 8-20-24 Time: 08:00

Grab
Date: 8-20-24 Time: 0945
Date: Time:
Date: Time:
Date: Time:

Smp#	Bottle	Preservative	Rcvd	Smp#	Bottle	Preservative	Rcvd
001	Plastic 1L	Unpreserved	☑	001	Plastic 250mL	H2SO4	☑
001	Plastic 1L, TSS	Unpreserved	☑	002	Sterilized, Plastic 100mL	Na2S2O3, Fecal Co	☑

Smp #	Smp Site	Matrix/ Smp Type	Tests			Temp Upon Receipt	Sample Date	Sample Time	Field pH	Field Cl	Field Temp
001	Deer Haven Daily Effluent Composite	Non Potable Wa	WA-CBOD WA-AM-NT	WA-TSS	WA-P-T	1.7 °C	8-20-24	0945		mg/L	°C
002	Deer Haven Daily Effluent Fecal Grab	Non Potable Wa	WW-TF-C18			0.1 °C	8-20-24	0945		mg/L	°C

8-20-24

Receipt Info: Recieved on ice? (Y) / N COC intact and complete? (Y) N Adquate samples? (Y) N Completed by: AP
Samples intact? (Y) / N Correct containers? (Y) N Volatiles: Headspace present? ~~Y / N~~ Samples/COC/Analysis agree? (Y) / N

Sampled By: William J. Dixon

Field Meter ID:
Notes:

		Date	Time
RELINQUISHED BY:	William J. Dixon	8-20-24	1050
RECEIVED BY:		8/20/24	1220
RELINQUISHED BY:			
RECEIVED AT LAB:		8/20/24	1400
LOGGED IN AT LAB:		8-20-24	1505

QSP-008-F02B Rev 005

ATTACHMENT C


Existing WWTP
New WWTP
200ft
41.381546 -75.254892 Degrees
Maxar, Microsoft
POWERED BY esri

ATTACHMENT D

Bisignani, Michael

From: MBisignani@aquaamerica.com
To: Bisignani, Michael
Subject: FW: [EXTERNAL] Fwd: Aqua Deer Haven Structural Inspection

---

From: Kyle Lantzy <Kyle.Lantzy@ghd.com>
Sent: Thursday, August 22, 2024 6:32:33 PM
To: Michael Bisignani <Michael.Bisignani@ghd.com>
Cc: Arielle Novak <Arielle.Novak@ghd.com>
Subject: Aqua Deer Haven Structural Inspection

Good Evening Mike,
Summary of the site visit is below.

The existing facility has a many deficiencies and in my professional opinion is *NOT SAFE TO BE OCCUPIED*.

The exterior is in decent condition. It was stated that the wooden exterior and metal siding/roofing was added around 2016.
There are reinforced CMU retaining walls at the South East corner of the building. The walls are showing signs of deterioration, deflection and bowing. This wall is beginning to fail.

The interior of the building is a complex combination of an existing failed metal building structure and a “Newer” steel column, wooden wall girt, and wooded truss system.
The existing Metal “Butler” Building had already failed in the past and was partially demolished. What is left of the existing metal building is poorly shored by 2x4 posts that rest on the metal process tanks, or wooden framing below. The existing metal building roof purlins are severely corroded and have deflected several feet. Portions of the metal moment frame were cut and left in place. These frames can be moved by pushing on them.

At some point it was attempted to building a steel/wooden hybrid pole type structure. Steel columns, masonry columns and a steel roof support structure above the existing metal building and process tanks were added.
While installing the steel columns, the horizontal metal building girts that were left in place were cut on each side of the steel column, which compromises the force transfer during wind storms. Portions of the exterior walls can be shaken in and out several inches when pushed on. There is a location when the existing electrical service comes into the building where the electrical service is mounted to the old steel building and the horizontal girts and steel frame are cut. Adjacent to this area the wooden building wall girts also are cut and are not anchored to a wooden post. The exterior metal siding is not attached to either the old metal building or the wooden wall girts in several locations.

Around the process tanks there are wooden frames placed on grade with plywood for a walking surface. This is a hazard as there are many areas where there are rotted holes in the plywood either exposed or covered up by loose laying plywood.

The process tanks are in poor condition. The top bracing channels are severely deteriorated and collapsing. There is little to no safety grating over the tanks and any grating planks are deteriorating and not anchored down, so they could move if walked on. Some grating planks are rusted in half and remain resting on the top of the tank and a severely corroded center support stiffener. There is no safety railing around the tanks and the stairs are not anchored and shift when stepped on.

The building is not ventilated and is a classified space due to the waste water tanks inside.

This is just a summary and will be followed up by a memo along with photos and observations.

Again, it is my professional opinion that this building should not be occupied as there are numerous safety issues along with the potential of potions of the building to collapse, either by itself or during a wind event.

Regards,

Kyle

KYLE J LANTZY
PE
Senior Structural Engineer
Northeast Engineering Design Discipline Lead – Structural

GHD
Proudly employee-owned | ghd.com
225 Grandview Avenue Suite 403 Camp Hill PA 17011
D +1 717 585 6405 **M** +1 717 480 8984 **E** kyle.lantzy@ghd.com

ATTACHMENT E

AQUA