

**Application of Pennsylvania-American Water Company for Acquisition of  
the Wastewater Assets of East Coventry Township**

**66 Pa. C.S. §1329**

**Application Filing Checklist – Water/Wastewater**

**Docket No. A-2025-3053487**

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<sup>1</sup>:
- 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.

**RESPONSE:** g. PAWC's compliance record has been consistently strong over the last five 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 wastewater violations in nearby systems. We continue to improve our processes and provide training to eliminate future similar occurrences.

- Exeter Wastewater System Violations: Wastewater DEP inspection violations of effluent limits at the treatment plant for exceedance of ammonia exceeding effluent limits in June and December 2020; January, May, June, July, October, November and December of 2021; July 2022. In addition, the plant exceeded Fecal Coliform in January 2021, September, October, December 2021, August 2022 and June 2023; Total Copper was exceeded in June 2021; Total Residual Chlorine was exceeded in August 2021, December 2021 and June 2024; Total Dissolved Solids in June 2024; Total Suspended Solids in April 2024 and June 2024. SSOs in November 2019, January, May, August, September, October, and December 2020; September and December 2021; February, April, August, and December 2022; April, May, July, and December 2023; January, March, April, and July 2024; January, March, April, May, and July 2025.
- Upper Pottsgrove System Violation: The Upper Pottsgrove collection system experienced a sanitary sewer overflow (SSO) in

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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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August of 2023. The SSO was discovered and corrected and reported to DEP.

- Royersford Wastewater System Violations: Royersford Wastewater Treatment Plant exceeded effluent limit for Fecal Coliform in July 2021; April, June and September 2022; January, May, June, July, October and December 2023; pH in May 2022 and November 2023, Total Residual Chlorine in January 2024 ; Total Ammonia in December 2023, January and February of 2024; January 2025; Total Dissolved Solids in January 2024 and February 2025; Total Phosphorus in July 2021 and January 2025; Total Suspended Solids in May 2021; failure to collect 1 influent BOD in February 2023; pump station SSO in April 2024; Unauthorized Discharge at WWTP in March and May 2025 (bypass pipe leak and frac tank overflow).
- Coatesville Wastewater System Violations: The Coatesville Wastewater Treatment Plant exceeded effluent limitations for Total Phosphorus in May 2024. TRC in April, July, August, and September 2024. SSOs in April and August 2020; May and June 2022; April and November 2023; March, April, May, June, August, and October 2024; February, April, May, June, July, August, and September 2025.