



www.delcora.org

Delaware County Regional Water Quality Control Authority
CHESTER, PENNSYLVANIA

CSO Long Term Control Plan

Consent Decree
Semi-Annual Report No. 2

For the Reporting Period of
January 1, 2016 – June 30, 2016

CIVIL ACTION NO. Case 2:15-cv-04652-RB
Filed: 11/10/15

NPDES Permit Number PA0027103 A-1

June 30, 2016



SEMI ANNUAL REPORT CERTIFICATION SHEET
Consent Decree Semi-Annual Report No. 2

For the Reporting Period of January 1, 2016 – June 30, 2016

CIVIL ACTION NO. Case 2:15-cv-04652-RB

Filed: 11/10/15

June 29, 2016

I certify under penalty of law that the document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

DELCORA MANAGEMENT		
Executive Director	 Signature	<u>6/29/16</u> Date
DELCORA ENGINEERING		
Director of Engineering	 Signature	<u>6/29/16</u> Date
DELCORA OPERATIONS AND MAINTENANCE		
Director of Operation and Maintenance	 Signature	<u>6/29/16</u> Date



Table of Contents

Section 1 Introduction	1
Section 2 Consent Decree Progress Reports	1
Section 3 Items Requiring Government Action	1
Section 4 Deadlines	1
Section 5 Description of Work Completed Within the Six-Month Period and Projection of Work	2
Section 6 Summary of All Contacts with EPA AND PADEP	2
Section 7 Statement of Exceedances of NPDES Permit Limitations	2
Section 8 Summary of All CSOs, SSOs and Unpermitted Discharges Occuring within the Six-Month Period	2

List of Tables

Table 1 Items Requiring Government Action	3
Table 2 Deadlines for this Reporting Period of CD	7
Table 3 Work Completed Within the Six-Month Period and to be Completed in the Next Six-Month Period	11
Table 4 Summary of All Contacts with the EPA and the PaDEP	17
Table 5 Summary of Any Exceedances of NPDES Permit Limitations	21
Table 6 Summary of CSOs, SSOs and Unpermitted Discharges	25

Appendices

Appendix 1 Additional Correspondence	29
Appendix 2 Notification Letters	35
Appendix 3 NPDES Permit Exceedance Report	77
Appendix 4 CSOs, SSOs and Unpermitted Discharges Correspondence	79

SEMI-ANNUAL REPORT FY 2016 JUNE

Section 1 Introduction

The Delaware County Regional Water Quality Control Authority (DELCORA) entered into a Consent Decree (CD) with the United States Government to establish a schedule for implementation of Long Term Control Plan Update (LTCPU) to achieve full compliance with the Clean Water Act and the regulations and Clean Streams Law and regulations. The lodging of this Consent Decree was entered by the court on August 17, 2015 in Civil Action Case 2:15-cv-04652-RB Document 4 by the United States District Court for the Delaware County Regional Water Quality Control Authority. The Consent Decree was signed and filed on November 10, 2015 by the United States District Court for the Eastern District of Pennsylvania.

Section 2 Consent Decree Progress Reports

On the first Day of each Semi-Annual Period after the Date of Lodging of this Consent Decree and continuing until termination of this Consent Decree, DELCORA will submit to EPA and PADEP a progress report ("Semi-Annual Progress Report") regarding the implementation of the requirements of the Consent Decree in the previous Semi-Annual Period. The Semi-Annual Progress Report will include at a minimum:

- a. A statement setting forth the deadlines and other terms that DELCORA was required by the Consent Decree to meet since the date of the last Semi-Annual Progress Report, whether and to what extent DELCORA has met these requirements, and the reasons for any noncompliance;
- b. A general description of the work completed within the prior Semi-Annual Period, and a projection of work to be performed pursuant to this Consent Decree during the next or succeeding Semi-Annual Period;
- c. A summary of all contacts with EPA and PADEP during the reporting period relating to CSOs, SSOs, or implementation of this Consent Decree;
- d. A statement of any exceedances of NPDES Permit limitations; and,
- e. A summary of all CSOs, SSOs, Unauthorized Releases, and Unpermitted Discharges occurring within the Semi-Annual Period including the actual or estimated frequency, duration, and volume of each CSO, SSO, Unauthorized Release, and Unpermitted Discharge.

Section 3 Items Requiring Government Action

Table 1 is a status report for items requiring government action this reporting period. This may include items such as permits and information requests from government agencies. *Appendix 1 – Additional Correspondence* contains the letters of correspondence to government agencies.

Section 4 Deadlines

Table 2 is a status report of 1) the deadlines and other terms that DELCORA was required by this Consent Decree to meet since the date of the last Semi-annual Progress Report; 2) whether and to what extent DELCORA has met these requirements; and 3) the reasons for any non-compliance.

SEMI-ANNUAL REPORT FY 2016 JUNE

Section 5 Description of Work Completed Within the Six-Month Period and Projection of Work

Table 3 is a status report of 1) a general description of the work completed within the six-month period; and 2) a projection of work to be performed pursuant to this Consent Decree during the next or succeeding six-month period.

Section 6 Summary of All Contacts with EPA AND PADEP

Table 4 is a summary of all contacts with the EPA and PADEP during the report period relating to CSOs, SSOs or implementation of this Consent Decree. *Appendix 2 – Notification Letters* contains all the letters that were sent to EPA and PADEP which are summarized in Table 4.

Section 7 Statement of Exceedances of NPDES Permit Limitations

Under National Pollutant Discharge Elimination System (NPDES) Permit No. PA0027103, issued and administered by the Pennsylvania Department of Environmental Protection (PADEP), DELCORA is authorized to discharge from the Western Regional Treatment Plant (Outfall 001), four storm water outfalls at the WRTP (028-031) and from 26 combined sewer overflow (CSO) outfalls (002-026, 032, 033) that ultimately discharge to the Delaware River, Chester Creek and/or Ridley Creek.

Table 5 is a summary of any exceedances of NPDES Permit limitations. *Appendix 3 – NPDES Permit Exceedance Report* contains the NPDES Permit exceedance reports generated within this six-month reporting period.

Section 8 Summary of All CSOs, SSOs and Unpermitted Discharges Occuring within the Six-Month Period

Table 6 is a summary of all CSOs, SSOs and Unpermitted Discharges occurring within the six-month reporting period including the actual or estimated frequency, duration and volume of each CSO, SSO and unpermitted discharge. *Appendix 4 – CSOs, SSOs and Unpermitted Discharges Correspondence* contains all CSO correspondence and inspections for the reporting period.

Table 1

Items Requiring Government Action

Table 2

Deadlines for this Reporting Period of
Consent Decree

TABLE 2 DEADLINES FOR THIS REPORTING PERIOD OF CONSENT DECREE			
Reference	Requirement	Deadline in CD	Status (Met Requirement or any Non-compliance)
CD V.A.11: Identification of Sensitive Areas and Pollutants of Concern	Consent Decree Paragraph V.A.11 (Identification of Sensitive Areas and Pollutants of Concern) requires that within six (6) months after the Date of Lodging, DELCORA shall submit a report that identifies all Sensitive Areas and Pollutants of Concern that are impacted by CSOs and are within the Model Area for each of its receiving waters	02/17/16	Met Requirement (submitted to USEPA 02/12/16)
CD V.A.13: Alternatives Evaluation Approach	Consent Decree Section V.A.13 ("Alternatives Evaluation Approach") requires within nine (9) months after the Date of Lodging, DELCORA shall propose, in coordination with the EPA and PADEP and in accordance with Section II.C.4 of the CSO Control Policy, what approach to LTCP Alternative Evaluation (i.e., Presumption or Demonstration) is appropriate for each of DELCORA's Receiving Waters, and to submit a written explanation of such determination to Plaintiffs for review and approval pursuant to Section VI (Review and Approval of Submittals)."	05/17/16	Met Requirement (submitted to USEPA 04/27/16)
CD V.A.17: Draft Financial Capabilities Assessment	Within nine (9) months after the date of Lodging DELCORA shall submit to EPA and PADEP for review and comment a draft Financial Capability Assessment ("FCA")	05/17/16	Met Requirement (submitted to USEPA 05/13/16)
CD V.A.11: Identification of Sensitive Areas and Pollutants of Concern	Within 60 Days following receipt of any notice from EPA disapproving a submittal or directing modification of a submittal pursuant to the preceding Paragraph (or within such longer time set forth in the notice or agreed to by the Parties), DELCORA shall submit a modified submittal to EPA and PADEP for approval	60 days	Met Requirement Received comments 3/24/16 Resubmitted 05/18/16

TABLE 2 DEADLINES FOR THIS REPORTING PERIOD OF CONSENT DECREE			
Reference	Requirement	Deadline in CD	Status (Met Requirement or any Non-compliance)
CD V.A.12: Typical Year Rainfall Record Report	Within 60 Days following receipt of any notice from EPA disapproving a submittal or directing modification of a submittal pursuant to the preceding Paragraph (or within such longer time set forth in the notice or agreed to by the Parties), DELCORA shall submit a modified submittal to EPA and PADEP for approval	60 days	Met Requirement Received comments 2/25/16 Resubmitted 04/28/16
CD V.A.17: Public Participation Plan	Within 60 Days following receipt of any notice from EPA disapproving a submittal or directing modification of a submittal pursuant to the preceding Paragraph (or within such longer time set forth in the notice or agreed to by the Parties), DELCORA shall submit a modified submittal to EPA and PADEP for approval	60 days	Met Requirement Received comments 2/18/16 Resubmitted 04/14/16

Table 3

Work Completed Within the Six-Month
Period and to be Completed in the Next
Six-Month Period

TABLE 3 WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD				
Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
LTCPU	January 2016 thru July 2016	Held Monthly Progress Meetings with Greeley and Hansen and subconsultants. Prepared Monthly Progress Reports. Held internal coordination meetings and teleconferences. Developed LTCPU schedule. Updated Overall LTCPU Schedule with Consent Decree Start Date. Reviewed previous USEPA comments on LTCP.	2/17/19	On-going, On schedule
Consent Decree V.A.11: Identification of Sensitive Areas and Pollutants of Concern	January 2016 thru May. 2016	<u>Identification of Sensitive Areas and Pollutants of Concern</u> Finalized water quality exceedance analysis for the final List of Parameters Considered. Finalized the List of Pollutants of Concern (POCs). Finalized search for water quality data for the Delaware River, Chester Creek and Ridley Creek from EPA's STORET data base. Finalized GIS-based maps for the Identification of Sensitive Areas and Pollutants of Concern report. Finalized tally for survey. Held Workshop. Finalized Draft and Final Report to DELCORA. Submitted Final Identification of Sensitive Areas and Pollutants of Concern Report. Responded to USEPA comments and resubmitted revised report.	6 months - 2/17/16 60 days Respond to comments	Met Requirement (submitted to USEPA 02/12/16) Met Requirement Received comments 3/24/16 Resubmitted 05/18/16
Consent Decree V.A.12: Typical Year Rainfall Record Report	February 2016 thru April 2016	<u>Typical Year Rainfall Record</u> Received comments from the USEPA on the Typical Hydrologic Period Report. Reviewed and responded to USEPA Comments. Resubmitted Final Report to USEPA.	60 days to respond to comments.	Met Requirement Received comments 2/25/16 Resubmitted 04/28/16
Consent Decree V.A.13: Alternatives Evaluation Approach	January 2016 thru April 2016	<u>Alternatives Evaluation Approach</u> Completed work to run the H&H model for the Typical Year Rainfall to determine the model's predictions of CSO frequencies and volumes. Developed draft Report. Completed draft and finalize Alternatives Evaluation Approach Report. Submitted final report to USEPA.	05/17/16	Met Requirement (submitted to USEPA 04/27/16)

TABLE 3 WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD				
Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
Consent Decree V.A.14: Hydrologic and Hydraulic Model (H&H Model) Update and Calibration Plan	January 2016 thru May. 2016	<u>Hydrologic & Hydraulic Model ("H&H Model") Update & Calibration Plan</u> Final Hydrologic and Hydraulic (H&H) Model and Calibration Plan was submitted to USEPA on 10/15/15. Revised Schedule to reflect actual start date of flow and rain gauge monitoring. Received approval for Hydrologic and Hydraulic (H&H) Model and Calibration Plan from USEPA on 03/01/16.	10/17/15	MET REQUIREMENT Approved Report on 03/01/16 Started flow monitoring on 3/18/16.
Consent Decree V.A.14e: Rainfall and Flow Monitoring	January 2016 through June 2016	<u>Initiated Rainfall and Flow Monitoring</u> Finalized site locations for proposed flow meters and rain gauges. Installed flow meters and rain gauges. Tested and confirmed proper operation of flow meter and rain gauges. Officially started rainfall and flow monitoring plan on March 18, 2016. Received and analyzed flow meter data from March thru May 2016.	12 months of flow monitoring required	On-going, Flow monitoring started March 18, 2016.
Consent Decree V.A.17: Public Participation Plan	July 2015 thru Oct 2015	<u>Public Participation Plan</u> Advertised first Public Meeting in four (4) local papers. Held First Public Meeting on March 15, 2016. Responded to Public Comments. Held Stakeholders Meetings with CEP. Submitted meeting notes, responsive summary and presentation to USEPA. Developed Website and newsletter and off-Line repository Binder. Received comments from USEPA on 2/18/16. Responded to USEPA comments and resubmitted revised report. Report was approved by USEPA on 04/28/16.	60 days to respond to comments.	On-going, On schedule Met Requirement Received comments 2/18/16 Resubmitted 04/14/16
LTCPU CD V.A.18: Financial Capabilities Assessment	January 2016 thru May 2016	<u>Draft Financial Capabilities Assessment (FCA)</u> Finalized FCA calculations and report. Finalized Draft FCA Report and submitted final report to USEPA.	05/17/16	Met Requirement (submitted to USEPA 05/13/16)

TABLE 3
WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD

Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
Consent Decree V.II Reporting:	January 2016 thru June 2016	Semi-Annual Report – Developed Draft Report. Held Progress Meeting to discuss on 05/15/16. Reviewed Final Draft Report.	07/01/16	On schedule- All data in this semi-annual report is through June 29, 2016. Next report will include information from June 29, 2016.
Consent Decree V.B.26: Early Action CSO Control Measures	Currently in Design Phase	Additional Early Action Items.- EPS-01 Pump Station – Design is approximately 30 % complete. Continuing to develop design, permitting and land acquisition.	12/31/18	On-going, DELCORA has requested that this deadline date be extended to 12/31/19 due to concerns such as land acquisition and permitting. See correspondence Table 4 of this report.
Anticipated activities for the next 6 months				
Consent Decree V.A.11: Identification of Sensitive Areas and Pollutants of Concern	July 2016 thru September 2016	<u>Identification of Sensitive Areas and Pollutants of Concern</u> Receive final approval and / or comments from USEPA Respond to comments as required. Finalize Identification of Sensitive Areas and Pollutants of Concern Report and resubmit final report to USEPA as required.	Respond within 60 days of receiving comments	On-going, On schedule
Consent Decree V.A.14e: Rainfall and Flow Monitoring	March 2016 through March 2017	<u>Continue Rainfall and Flow Monitoring</u> Continue rainfall and flow monitoring plan.	12 months of flow monitoring	On-going, Flow monitoring started March 18, 2016 based
Consent Decree V.A.13: Alternatives Evaluation Approach	July 2016 thru September 2016	<u>Alternatives Evaluation Approach</u> Receive final approval and / or comments from USEPA Respond to comments as required. Finalize Alternatives Evaluation Approach Report and resubmit final report to USEPA as required.	Respond within 60 days of receiving comments	On-going, On schedule
LTCPU CD V.A.18: Financial Capabilities Assessment	July 2016 thru September 2016	<u>Draft Financial Capabilities Assessment (FCA)</u> Receive final approval and / or comments from USEPA Respond to comments as required. Finalize Draft Financial Capabilities Assessment (FCA) and resubmit final report to USEPA as required.	Respond within 60 days of receiving comments	On-going, On schedule

TABLE 3 WORK COMPLETED WITHIN THE SIX-MONTH PERIOD AND TO BE COMPLETED IN THE NEXT SIX-MONTH PERIOD				
Reference	Work Completed Date	Project/Activity/Request	Deadline in CD/NMC	Status/Comment (Met Requirement or any Non-Compliance)
Consent Decree V.A.17: Public Participation Plan	July 2016 thru December 2016	<u>Public Participation Plan</u> Continue to hold Stakeholders meetings with CEP. Submit meeting notes, responsive summary and presentation to USEPA. Continue to develop Website and newsletter and off-line repository Binder. Deliver Binders to off-line repositories.	2/17/19	On-going, On schedule
Consent Decree V.A.14: Hydrologic and Hydraulic Model (H&H Model) Update and Calibration Plan	July 2016 thru December 2016	<u>H&H Model Update</u> Review existing flow meter data. Collection system model update and construction. Update, calibrate and validate H&H Model.		On-going, On schedule
Consent Decree V.A.15: Water Quality Model Plan	July 2016 thru December 2016	<u>Water Quality Model Plan</u> Develop Water Quality Monitoring and Modeling Work Plan and Water Quality Assurance Project Plan (QAPP) .	Within 90 days after approval of the Alternatives Evaluation Approach	On-going, On schedule

Table 4

Summary of All Contacts with the EPA and
the PADEP

TABLE 4
USEPA / PADEP CORRESPONDENCE LOG (1/1/2016 – 6/30/2016)
DELCORA SEMIANNUAL REPORT

Date of Letter	Description	Control No.	Response Required	Date of PADEP Response	Date of EPA Response	Notes
1/29/16	DELCORA letter to USEPA submitting Revised Report for Public Participation Plan	1	YES	2/18/16	2/18/16	See Control No 4
2/5/16	Email - Received comments from PADEP on the Public Participation Plan	2	YES			See Control No. 4
2/12/16	DELCORA letter to USEPA submitting Final Report for Identification of Sensitive Areas and Pollutants of Concern	3	YES	3/24/16	3/24/16	See Control No. 7
2/18/16	USEPA letter to DELCORA transmitting Concerns and Comments on the Public Participation Plan	4	YES			See Control No 8
2/25/16	Email from DELCORA transmitting USEPA comments to team: Approval of the H&H Model and revisions required to the Typical Hydrological Year Plan.	5	YES			See Control No. 6
3/1/16	USEPA letter providing approval of the Hydrologic and Hydraulic Model Update and Calibration Plan	6	NO			Subject: Civil Action 2:15-cv-04652-RB From Andrew F. Seligman
3/24/16	USEPA letter to DELCORA transmitting Concerns and Comments on the Identification of Sensitive Areas and Pollutants of Concern Report	7	YES			See Control No. 15
3/30/16	Email from DELCORA to the team transmitting USEPA Disapproval of the Typical Hydrologic Period Report	8	YES			Email From Michael J. DiSantis DELCORA to resubmit report See Control No. 11
4/14/16	DELCORA letter to USEPA submitting revised Final Report for Public Participation Plan	9	YES	4/28/16	4/28/16	See Control No. 13
4/27/16	DELCORA letter to USEPA submitting Alternative Final Evaluation Approach Report	10	YES			Subject: Civil Action Number Case 2: 15-cv-04652-RB & DOJ Case Number 90-5-1-1-10972 Consent Decree Alternatives Evaluation Approach Report – Final From Michael J. DiSantis
4/28/16	DELCORA letter to USEPA submitting revised Final Report for Typical Hydrologic Period Report	11	YES	5/23/16	5/23/16	See Control No 16
4/28/16	DELCORA letter to USEPA submitting Public Meeting No. 1 Notes	12	NO			Subject: Civil Action Number Case 2: 15-cv-04652-RB & DOJ Case Number 90-5-1-1-10972 Report – Public Meeting No. 1 Notes From Michael J. DiSantis

TABLE 4
USEPA / PADEP CORRESPONDENCE LOG (1/1/2016 – 6/30/2016)
DELCORA SEMIANNUAL REPORT

Date of Letter	Description	Control No.	Response Required	Date of PADEP Response	Date of EPA Response	Notes
4/28/16	USEPA letter providing approval of the Public Participation Plan	13	NO			Subject: Civil Action 2:15-cv-04652-RB From Andrew F. Seligman
5/13/16	DELCORA letter to USEPA submitting Draft Financial Assessment Report	14	YES			Subject: Civil Action Number Case 2: 15-cv-04652-RB & DOJ Case Number 90-5-1-1-10972 Draft Financial Capability Assessment Report From Michael J. DiSantis
5/18/16	DELCORA letter to USEPA submitting Updated Identification of Sensitive Areas and Pollutants of Concern Report	15	YES			Subject: Civil Action Number Case 2: 15-cv-04652-RB & DOJ Case Number 90-5-1-1-10972 Consent Decree Updated Identification of Sensitive Areas and Pollutants of Concern Report to Address USEPA Comments
5/23/16	USEPA letter providing approval of the Typical Hydrologic Period Report	16	NO			Subject: Civil Action 2:15-cv-04652-RB From Andrew F. Seligman
6/17/16	DELCORA letter to USEPA requesting extension of deadline to place the new EPS-1 Pump Station into operation to December 31, 2019	17	YES			Subject: Civil Action Number Case 2: 15-cv-04652-RB & DOJ Case Number 90-5-1-1-10972 From Michael J. DiSantis
6/17/16	DELCORA letter to USEPA requesting clarification on the due date to provide the results and quality of Rainfall and Flow Monitoring Data	18	YES			Subject: Civil Action Number Case 2: 15-cv-04652-RB & DOJ Case Number 90-5-1-1-10972 From Michael J. DiSantis
6/21/16	DELCORA letter to USEPA requesting clarification on the due date to provide the results and quality of Rainfall and Flow Monitoring Data – Correction to the letter to USEPA dt 06-17-16	19	YES			Subject: Civil Action Number Case 2: 15-cv-04652-RB & DOJ Case Number 90-5-1-1-10972 Correction From Michael J. DiSantis

NOTES:

1. Copies of Correspondence are in Appendix 2

Table 5

Summary of any Exceedances of NPDES Permit Limitations

TABLE 5	
SUMMARY OF ANY EXCEEDANCES OF NPDES PERMIT LIMITATIONS	
DELCORA PERMIT NO. PA0027103 A3	

[illegible]

NOTES:

1. Copy of Report is in Appendix 3
2. WRTP – DELCORA Western Regional Treatment Plant

Table 6

Summary of All CSOs, SSOs and
Unpermitted Discharges Occurring within
the Six-Month Period

TABLE 6
SUMMARY OF ALL CSOs, SSOs and UNPERMITTED DISCHARGES
OCCURRING WITHIN THE SIX-MONTH PERIOD (1/1/2016 – 6/30/2016)

DELCORA Permit No. PA0027103

Date of Occurrence	Location	Event	Frequency	Duration	Volume	Comment
2/16/16	Central Delaware PS	SSO	Once	Start time – 2/16/16 at approx. 1:38 PM. Ended 2/16/16 at 2:01 PM	Unknown	Report sent 2/17/16, within 5 days of occurrence. Called PADEP on 2/16/16, day of occurrence.
2/18/16	CSO #004 Front and Hayes	CSO	Once	Start time – Unknown. Ended 2/18/16 at 7:35 AM	Unknown	Report sent 2/18/16 same day as occurrence and within 5 days. Called PADEP on 2/18/16, day of occurrence.
2/26/16	CSO #007 - Rainey St.	CSO	Once	Started on 2/26/16 at approx. 1:00 PM during temporary failure of interceptor pumping and ended when switched to another working pump at 2:55 PM on 2/26/16.	Unknown	Report sent 2/29/16, within 5 days of occurrence. Called PADEP on 2/26/16, day of occurrence.
3/11/16	Manhole #995 near 12 th and Parker	SSO	Once	Start time – Unknown. Ended 3/11/16 at 4:45 PM	Unknown	Report sent 3/14/16, within 5 days of occurrence. Called PADEP on 3/11/16, day of occurrence
4/26/16	3201 W. Front Street (WRTP)	SSO	Once	The incident happened at approximately 10:30 PM on 4/26/16 and ended at approximately 1:00 AM on 4/27/16	Unknown	PRF gravity line overflow. Report sent 5/2/16, within 5 days; Called PADEP on 4/26/16, day of occurrence
5/17/16	Park Valley Ln into wooded area. DELCORA Pipeline segment 3417	SSO	Once	Start time – Unknown. Ended approx. 1:00 PM on 5/17/16	Unknown	Report sent 5/18/16, within 5 days, Called PADEP on 5/17/16, day of occurrence
5/30/16	Central Delaware PS	SSO	Once	Start time – approx. 3:45 AM on 5/30/16. Ended approx. 5:35 AM on 5/30/16	Unknown	Report sent 5/31/16, within 5 days of occurrence. Called PADEP on 5/30/16, day as occurrence
5/31/16	Bridle Way PS	SSO	Once	Start time – Unknown, overflow observed around 7:30 AM on 5/31/16. Ended 5/31/16 approx. 8:00 AM	Unknown	Report sent 5/31/16 same day as occurrence and within 5 days.

1. DWO – Dry Weather Overflow; SSO – Sanitary Sewer Overflow; CSO – Combined Sewer Overflow
2. Copy of Reports are in Appendix 4

Appendix 1

Additional Correspondence



Pennsylvania Fish & Boat Commission

Division of Environmental Services

Natural Diversity Section

450 Robinson Lane

Bellefonte, PA 16823

814-359-5237

December 22, 2015

IN REPLY REFER TO

SIR# 45340

Greeley & Hansen
Marlene Finizio
1700 Market Street
Philadelphia, Pennsylvania 19103

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No.
Delaware County Regional Water Quality Authority
CSO Long Term Control Plan Update
Delaware County**

Dear Ms. Finizio:

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search “potential conflict” or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish & Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish & Boat Code (Chapter 75), or the Wildlife Code.

Based on records maintained in the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files, the following rare or protected species are known from the vicinity of the project site:

Common Name (Scientific Name, PA Status)

Atlantic Sturgeon (*Acipenser oxyrinchus*, Endangered)

Shortnose Sturgeon (*Acipenser brevirostrum*, Endangered)

Eastern Redbelly Turtle (*Pseudemys rubriventris*, Threatened)

The Shortnose and Atlantic Sturgeon, which are listed by both Pennsylvania and the U.S. Fish and Wildlife Service/National Marine Fisheries Service, occur in the Delaware River. They are especially vulnerable to physical (dredging, rip-rap, etc.) and chemical (pH, dissolved oxygen, temperature, heavy metals, and organic contaminants) changes to the aquatic environment. Although the mobile adults of these protected fish species may be capable of moving from the project area, their spawning grounds (including eggs, larvae, and immature fish) are vulnerable to burial, crushing by equipment, and siltation

Our Mission:

www.fish.state.pa.us

To protect, conserve and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities.

from construction projects. In-stream activities during their spawning period may also disrupt the adults' reproductive behavior. Both Atlantic Sturgeon and Shortnose Sturgeon adults and juveniles may also forage and migrate through the proposed project area and could be adversely impacted by the proposed project.

The Eastern Redbelly Turtle is one of Pennsylvania's largest native aquatic turtles. This turtle species is known to inhabit relatively large, deep streams, rivers, ponds, lakes, and marshes with permanent water and ample basking sites. Redbelly turtles are documented in the Delaware River, Darby Creek, Crum Creek, Ridley Creek, and Chester Creek within the project area. They can be found in deep, slow water habitats in the creeks, as well as impoundments and nearby ponds and lakes. The existence of this turtle species is threatened by habitat destruction, poor water quality and competition with aggressive non-native turtle species that share its range and habitat (e.g. red-eared slider).

Additionally, in response to your request, we recommend that you access county information on our website, at <http://fishandboat.com/county.htm> for locations of public boat launches on Darby Creek and the Delaware River.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact Kathy Gipe at 814-359-5186 and refer to the SIR # 45340. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,



Christopher A. Urban, Chief
Natural Diversity Section

CAU/KDG/dn

Cc: John Buzzar, PFBC



Pennsylvania Fish & Boat Commission

Division of Environmental Services

Natural Diversity Section

450 Robinson Lane

Bellefonte, PA 16823

814-359-5237

June 13, 2016

IN REPLY REFER TO

SIR# 45340

Greeley & Hansen
Marlene Finizio
1700 Market Street
Philadelphia, Pennsylvania 19103

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
Delaware County Regional Water Quality Authority: CSO Long Term Control Plan
Update
CHESTER County with Chester City Focus Area**

Dear Ms. Finizio:

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search “potential conflict” or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish & Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish & Boat Code (Chapter 75), or the Wildlife Code.

As stated in our prior correspondence, the following rare or protected species are known from the vicinity of the project site:

Common Name (Scientific Name, PA Status)

Atlantic Sturgeon (*Acipenser oxyrinchus*, Endangered)

Shortnose Sturgeon (*Acipenser brevirostrum*, Endangered)

Eastern Redbelly Turtle (*Pseudemys rubriventris*, Threatened)

Within the focus area of Chester City, the entire portion of the Delaware River can be considered habitat for all three species. More specifically, it provides foraging, spawning, and nursery habitat for the Sturgeon, and foraging and potential brumation (overwintering) habitat for the Eastern Redbelly Turtle. All three species could additionally occur in the tributary streams (Chester and Ridley Creeks); however, these are considered transient habitats rather than critical to life history.

Our Mission:

www.fish.state.pa.us

To protect, conserve and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities.

Given that this project plans has the goal of water quality improvement and includes no direct instream disturbance at this time, then I do not anticipate the proposed activity to have any significant adverse impacts to the fish or turtle species of special concern.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact Kathy Gipe at 814-359-5186 and refer to the SIR # 45340. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

A handwritten signature in black ink that reads "Christopher A. Urban". The signature is written in a cursive, flowing style.

Christopher A. Urban, Chief
Natural Diversity Section

CAU/KDG/dn

Appendix 2

Notification Letters



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

January 29, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Public Participation Plan Report (Final) – Revised 1/2016

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing a revised copy of the above mentioned report in accordance with the requirements of the Consent Decree and as discussed at our meeting on January 26, 2016 at the USEPA Philadelphia office.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email w/o enclosure
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

1 From Please print and press hard.

Date 1/29/2016

Sender's FedEx
Account Number

1060-5969-1

Sender's Name Mike DiSantis/bab

Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2

Dept./Floor/Suite/Room

City CHESTER

State PA ZIP 19013-4508

2 Your Internal Billing Reference

First 24 characters will appear on invoice.

Consent Decree-Public Participation

3 To Plan Report - rev 1/2016

Recipient's Name Chief, NPDES Enforcement Phone (215) 814-2097

Branch

Company Water Protection Division

Address USEPA, Region 3

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

Address 1650 Arch Street

Use this line for the HOLD location address or for continuation of your shipping address.

City Philadelphia

State PA ZIP 19103-2029

0119850666



FedEx at your fingertips. Good call.
Go to fedex.com/mobilesolutions.

4 Express Package Service

* To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.

For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☒ FedEx Priority Overnight
Next business morning * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Standard Overnight
Next business afternoon * Saturday Delivery NOT available.

2 or 3 Business Days

☐ FedEx 2Day A.M.
Second business morning * Saturday Delivery NOT available.

☐ FedEx 2Day
Second business afternoon * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Express Saver
Third business day * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required
Package may be left without obtaining a signature for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.

☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

One box must be checked.

☒ No ☐ Yes
As per attached Shipper's Declaration.

☐ Yes
Shipper's Declaration not required.

☐ Dry Ice
Dry Ice, 3, UN 1845 x kg

☐ Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☒ Sender
Acct. No. in Section 1 will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

Total Packages Total Weight Total Declared Value*

1 lbs \$ 00

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

1 From Please print and press hard.

Date 1/29/2016

Sender's FedEx
Account Number

1060-5969-1

Sender's Name Mike DiSantis/bab

Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2

Dept./Floor/Suite/Room

City CHESTER

State PA ZIP 19013-4508

2 Your Internal Billing Reference

First 24 characters will appear on invoice.

LTCP - Public Participation Plan

3 To Report - rev 1/2016

Recipient's Name Chief, Environmental Phone (202) 514-2757

Enforcement Section

Company Environment & Natural Resources Division

Address US DOJ

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

Address 601 D. Street NW

Use this line for the HOLD location address or for continuation of your shipping address.

City Washington

State DC ZIP 20004

0119850666



Get transit times. Schedule pickups.
Create labels. Go to fedex.com.

4 Express Package Service

* To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.

For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☒ FedEx Priority Overnight
Next business morning * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Standard Overnight
Next business afternoon * Saturday Delivery NOT available.

2 or 3 Business Days

☐ FedEx 2Day A.M.
Second business morning * Saturday Delivery NOT available.

☐ FedEx 2Day
Second business afternoon * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Express Saver
Third business day * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required
Package may be left without obtaining a signature for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.

☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

One box must be checked.

☒ No ☐ Yes
As per attached Shipper's Declaration.

☐ Yes
Shipper's Declaration not required.

☐ Dry Ice
Dry Ice, 3, UN 1845 x kg

☐ Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☒ Sender
Acct. No. in Section 1 will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

Total Packages Total Weight Total Declared Value*

1 lbs \$ 00

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

MURVA #163

1 From Please print and press hard.

Date 1/29/2016 Sender's FedEx Account Number 1060-5969-1

Sender's Name Mike DiSantis/bab Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2

Dept./Floor/Suite/Room

City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference

Consent Order-Public Participation

3 To Plan Report - rev 1/2016

Recipient's Name Program Manager Phone (484) 250-5970

Company PADEP - SERO

Address 2 East Main Street

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

Address Norristown

City Norristown State PA ZIP 19401

0119850666



Ship it. Track it. Pay for it. All online.
Go to fedex.com.

1 From Please print and press hard.

Date 1/29/2016 Sender's FedEx Account Number 1060-5969-1

Sender's Name Mike DiSantis/bab Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2

Dept./Floor/Suite/Room

City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference

Consent Order-Public Participation

3 To Plan Report - rev 1/2016

Recipient's Name Philip Yeany Phone (215) 814-2359

Company USEPA, Region 3

Address 1650 Arch Street

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

Address Philadelphia

City Philadelphia State PA ZIP 19103-2029

0119850666



Learn to pack like a pro.
Go to fedex.com/packaging.

4 Express Package Service * To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ FedEx Priority Overnight
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ FedEx 2Day A.M.
Second business morning. Saturday Delivery NOT available.
- ☐ FedEx 2Day
Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Express Saver
Third business day. Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

- ☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ No Signature Required
Package may be left without obtaining a signature for delivery.
- ☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.
- Does this shipment contain dangerous goods?**
One box must be checked.
- ☒ No ☐ Yes As per attached Shipper's Declaration. ☐ Yes Shipper's Declaration not required. ☐ Dry Ice Dry Ice, 5, UN 1845 x kg
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. ☐ Cargo Aircraft Only

7 Payment Bill to:

- Sender ☒ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- FedEx Acct. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- FedEx Acct. No. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- Exp. Date

Total Packages 1 Total Weight 1 lbs. Total Declared Value*

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #153134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

MUR 1

4 Express Package Service * To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ FedEx Priority Overnight
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ FedEx 2Day A.M.
Second business morning. Saturday Delivery NOT available.
- ☐ FedEx 2Day
Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Express Saver
Third business day. Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

- ☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ No Signature Required
Package may be left without obtaining a signature for delivery.
- ☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.
- Does this shipment contain dangerous goods?**
One box must be checked.
- ☒ No ☐ Yes As per attached Shipper's Declaration. ☐ Yes Shipper's Declaration not required. ☐ Dry Ice Dry Ice, 5, UN 1845 x kg
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. ☐ Cargo Aircraft Only

7 Payment Bill to:

- Sender ☒ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- FedEx Acct. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- FedEx Acct. No. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- Exp. Date

Total Packages 1 Total Weight 1 lbs. Total Declared Value*

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

MURVA #163

Finizio, Marlene

From: DiSantis, Michael <disantism@delcora.org>
Sent: Friday, February 05, 2016 8:32 AM
To: mhill@blankrome.com; Willert, Robert; Pileggi, John; Bothwell, Ed; Finizio, Marlene; Hope, Michael
Subject: FW: DELCORA Public Participation Plan

To All:

FYI, please see below.

Mike

From: Fields, Jenifer [mailto:jefields@pa.gov]
Sent: Friday, February 05, 2016 8:27 AM
To: DiSantis, Michael
Subject: FW: DELCORA Public Participation Plan

Mike,

I am forwarding to you the comments that DEP had regarding the Public Participation Plan. It's my understanding that Andrew Seligman will be coordinating a formal letter response but due to the proposed schedule to implement the plan, I wanted Delcora to have as much time as possible to consider these comments. I have not spoken with EPA about these comments, and they may or may not make the final cut. Most are clarifications or improvements to inclusion.

Jen

Jenifer Fields, P.E. | Environmental Program Manager
Department of Environmental Protection | Southeast Regional Office
2 E. Main Street | Norristown, PA 19401
Phone: 484.250.5192 | Fax: 484.250.5971
www.depweb.state.pa.us

PRIVILEGED AND CONFIDENTIAL COMMUNICATION The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers.

The following are the DEP's comments to EPA on the Public Participation Plan.

Executive Summary:

- Background
 - The second paragraph of the background section mistakenly gives the DEP the acronym USEPA.
- Purpose
 - Consider changing i: "Address the impact of DELCORA's CSOs and LTCP on environmental justice populations" to "environmental justice communities."
 - Consider changing vi: "The plan..." to "Include a schedule for DELCORA's implementation of the plan."
- Public and Stakeholder Meetings
 - In the last paragraph which discusses a concerted effort to be made to make the public aware of the LTCPU development process, it would be helpful to identify where the materials will be distributed- for example- community centers, places of worship, and municipal buildings, etc.

Section 1.3 Public Participation Plan Overview

- Who are these “key decision makers” that DELCORA plans to involve? Where are they coming from and what constituencies do they represent?

Section 2.4: Responsiveness Summary

In addition to being posted on the website, and being made available at subsequent meetings, an offline repository should be considered. This could potentially be at a municipal building or a public library. For the broadest possible reach to stakeholders, DEP typically uses both municipal buildings and libraries. In general, the plan relies a little too heavily on internet or web-based information exchange.

- Subsequent meetings should include a review of (not just provide) the prior meeting’s “responsiveness summary.”
- It may be worth considering having each of the meetings digitally streamed or have them viewable at all four locations. This may provide for continuity of thought and community involvement.

Section 2.6, Page 2-4:

Paragraph 2 states, “...public’s input will be ‘actively solicited’. How? With how much notice? It is important for “active participation” in the meetings, for participants to receive materials to be presented in advance of the meeting. In order for the participation to truly be active, they should add this to their proposal and advise people that there will be a questions, comments and ideas opportunity at each meeting.

Similarly, **Attachment A** shows their proposed timeline. They receive public comments from the website for an additional 30 days, which is good...however I didn’t see anywhere that mentioned how residents could submit comments through mail. It is very important that an offline option is at least provided, even if not utilized by the public. Even better, it would be very transparent for any non-web comments to be written into the website one received so all comments received are located in one place.

If the first public meeting is planned to be used to brief the public there should be a document available well in advance of the meeting since this is merely historical information.

Page 4-2:

The report says the website tab that houses all this information will be called ‘DELCORA CSO LTCPU’. This may (and will likely) be confusing to ‘average citizens’. They should consider naming the tab something easier, more straightforward and with less of an acronym. Based on the screenshots they provided, it also is not clear where to find the info. Even a banner ad on the home page would be helpful, or a large button that clearly directs people to the clearinghouse section.....Community Involvement, Public Participation, Public Information, etc are all suggestions. Will the website provide a means for interested parties to sign up to receive the newsletter?

Page 4-2:

The mailing list they suggest is not clearly defined. This should be a hardcopy/USPS newsletter as well as a digital subscription. Sign-in sheets at the public meetings could include a box to check whether you want to be mailed or emailed the newsletter, or to not receive it at all. Providing residents the information through their own personal preferred method ensures better understanding and participation in the process.

Attachment B1, Slideshow

The tone of the PowerPoint for example- “EPA took 10 years to review this”, or “EPA is *targeting* systems” may distract interested parties from meaningful conversation about the plan development. Also, On slide 8- I believe the information is incorrect. There is no Consent Decree between EPA and Philadelphia. On slide 11, did DOJ make the comment in the last bullet? If it isn’t in writing somewhere, it probably should be excluded.

Attachment B3, sample press release

The sample press release should mention that the settlement is with both EPA and DEP.

In general, Cut down on the use of acronyms, in all documents and presentations with the public. Along with the agendas, consider printing a glossary on the back side to help those following along with presentations where acronyms are used.

Jenifer Fields, P.E. | Environmental Program Manager
Department of Environmental Protection | Southeast Regional Office
2 E. Main Street | Norristown, PA 19401
Phone: 484.250.5192 | Fax: 484.250.5971
www.depweb.state.pa.us

PRIVILEGED AND CONFIDENTIAL COMMUNICATION The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers.



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

February 12, 2016

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Consent Decree
Identification of Sensitive Areas and Pollutants of Concern
Report – Final

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing a copy of the above mentioned report in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

1 From Please print and press hard.

Date **2/12/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference Consent Order-Pollutants REport

3 To Recipient's Name **Chief, NPDES Enforcement Branch 215-814-2097** (3WP42) Phone

Company **Water Protection Division**

Address **USEPA, Region 3** HOLD Weekday
We cannot deliver to P.O. boxes or P.O. ZIP codes. REQUIRED, NOT available for
FedEx First Overnight.
Dept./Floor/Suite/Room

Address **1650 Arch Street** HOLD Saturday
Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED, Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

City **Philadelphia,** State **PA** ZIP **19103-2029**

0119850666



Get transit times. Schedule pickups.
Create labels. Go to fedex.com.

1 From Please print and press hard.

Date **2/12/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference Consent Order-Pollutants Report

3 To Recipient's Name **Chief, Environmental** Phone (**202**) **514-2757**

Enforcement Section

Company **US DCJ**

Address **601 D Street NW** HOLD Weekday
We cannot deliver to P.O. boxes or P.O. ZIP codes. REQUIRED, NOT available for
FedEx First Overnight.
Dept./Floor/Suite/Room

Address **Washington, DC** HOLD Saturday
Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED, Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

City **Washington, DC** State **DC** ZIP **20004**

0119850666



Learn to pack like a pro.
Go to fedex.com/packaging.

4 Express Package Service * To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ FedEx Priority Overnight
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Standard Overnight
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ FedEx 2Day A.M.
Second business morning. * Saturday Delivery NOT available.
- ☐ FedEx 2Day
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Express Saver
Third business day. * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

- ☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ No Signature Required
Package may be left without obtaining a signature for delivery.
- ☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.
- Does this shipment contain dangerous goods?
One box must be checked.
☒ No ☐ Yes As per attached Shipper's Declaration. ☐ Yes Shipper's Declaration not required. ☐ Dry Ice Dry Ice, 5, UN 1845 x kg
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. ☐ Cargo Aircraft Only

7 Payment Bill to:

- Enter Fed. Acct. No. or Credit Card No. below.
☒ Sender Acct. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
FedEx Acct. No. Credit Card No. Exp. Date
- Total Packages **1** Total Weight **1** lbs. Total Declared Value* **00**

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

MUR 1

4 Express Package Service * To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ FedEx Priority Overnight
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Standard Overnight
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ FedEx 2Day A.M.
Second business morning. * Saturday Delivery NOT available.
- ☐ FedEx 2Day
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Express Saver
Third business day. * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

- ☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ No Signature Required
Package may be left without obtaining a signature for delivery.
- ☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.
- Does this shipment contain dangerous goods?
One box must be checked.
☒ No ☐ Yes As per attached Shipper's Declaration. ☐ Yes Shipper's Declaration not required. ☐ Dry Ice Dry Ice, 5, UN 1845 x kg
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. ☐ Cargo Aircraft Only

7 Payment Bill to:

- Enter Fed. Acct. No. or Credit Card No. below.
☒ Sender Acct. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
FedEx Acct. No. Credit Card No. Exp. Date
- Total Packages **1** Total Weight **1** lbs. Total Declared Value* **00**

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

FedEx
Tracking
Number

8082 5253 2288

1 From Please print and press hard.

Date 2/12/2016 Sender's FedEx Account Number 1060-5969-1

Sender's Name M. J. DiSantis/bab Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2

City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference Consent Order-Pollutants RReport

3 To Recipient's Name Program Manager Phone (484) 250-5970

Clean Water Program

Company PADEP, SERO

Address 2 East Main Street

City Norristown State PA ZIP 19401

0119850666



FedEx at your fingertips. Good call.
Go to fedex.com/mobilesolutions

FedEx
Tracking
Number

8082 5253 2277

1 From Please print and press hard.

Date 2/12/2016 Sender's FedEx Account Number 1060-5969-1

Sender's Name M. H. DiSantis/bab Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2

City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference Consent Order-Pollutants Report

3 To Recipient's Name Philip Yeany Phone (215) 814-2359

Office of Regional Counsel (3RC20)

Company USEPA, Region 3

Address 1650 Arch Street

City Philadelphia State PA ZIP 19103-2359

0119850666



Ship it. Track it. Pay for it. All online.
Go to fedex.com

Form
ID No.

0215

Sender's Copy

4 Express Package Service

* To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ FedEx Priority Overnight
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Standard Overnight
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ FedEx 2Day A.M.
Second business morning. * Saturday Delivery NOT available.
- ☐ FedEx 2Day
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Express Saver
Third business day. * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500

- ☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

- ☐ No Signature Required
Package may be left without obtaining a signature for delivery.
- ☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

- ☒ No ☐ Yes
As per attached Shipper's Declaration. ☐ Shipper's Declaration not required. ☐ Dry Ice
Dry Ice, 9, UN 1845 x kg
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. ☐ Cargo Aircraft Only

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
- ☒ Sender Acct. No. in Section 1 will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- FedEx Acct. No. Credit Card No. Exp. Date

Total Packages 1 Total Weight lbs. \$ 00

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

MUR1

Form
ID No.

0215

Sender's Copy

4 Express Package Service

* To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ FedEx Priority Overnight
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Standard Overnight
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ FedEx 2Day A.M.
Second business morning. * Saturday Delivery NOT available.
- ☐ FedEx 2Day
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ FedEx Express Saver
Third business day. * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500

- ☐ FedEx Envelope* ☒ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

- ☐ No Signature Required
Package may be left without obtaining a signature for delivery.
- ☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

- ☒ No ☐ Yes
As per attached Shipper's Declaration. ☐ Shipper's Declaration not required. ☐ Dry Ice
Dry Ice, 9, UN 1845 x kg
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. ☐ Cargo Aircraft Only

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
- ☒ Sender Acct. No. in Section 1 will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
- FedEx Acct. No. Credit Card No. Exp. Date

Total Packages 1 Total Weight lbs. \$ 00

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #18134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

cert. mail
Mr. B. Willert
RECEIVED
FEB 22 2016
2016-0230

Mr. Robert Willert, Executive Director
Delaware County Regional Quality Control Authority
100 East Fifth Street
Chester, PA 19013

FEB 18 2016

cc: RJW, MJD,
E. Bothwell
J. Pileggi
Peg Hill
Greeley-Hansen:
M. Finizio
M. Hope

RE: Civil Action 2:15-cv-04652-RB
Public Participation Plan

Dear Mr. Willert:

Thank you for the Public Participation Plan (PPP) that the Delaware County Regional Quality Control Authority (DELCORA) sent to the United States Environmental Protection Agency (EPA) on January 29, 2016. EPA has reviewed the PPP and, as part of the PPP review process, consulted with the Pennsylvania Department of the Environment (PaDEP). We have the following comments and concerns. EPA is unable to approve the PPP until the following concerns are responded to and addressed in the PPP:

Concerns

Executive Summary: Public and Stakeholder Meetings

The last paragraph, which discusses a concerted effort to make the public aware of the LTCPU development process, does not identify where the materials will be distributed- for example- community centers, places of worship, and municipal buildings, etc. Please identify where DELCORA will distribute the materials.

Section 1.3: Public Participation Plan Overview

Please identify all the "key decision makers" that DELCORA plans to involve and what constituencies they represent.

Section 2.3: Facilities Description and Location

Because of the impacts that the chosen alternatives may have on the City of Chester, the third or fourth public meeting should take place in the City.

Section 2.4: Responsiveness Summary

In addition to posting the summaries on the website and making them available at subsequent meetings, DELCORA needs to consider creating an offline repository for them. This could potentially be at a municipal building or a public library. For the broadest possible reach to stakeholders, PaDEP typically



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*

uses both municipal buildings and libraries. While relying on the on the internet and web to for information exchange is extremely important, DELCORA needs to provide a medium needs for people who may not have internet access. Finally, subsequent public meetings should include a review of the prior meeting's "responsiveness summary".

Section 2.6: Public Meeting Descriptions

DELCORA needs to provide more details on how it intends to ask for the public's input at the four public meetings. For example, on Page 2-4, Paragraph 2 states, that "...the public's input will be "actively solicited." How does DELCORA plan to actively solicit the public's input? How much time will the public receive in order to participate? DELCORA should advise people ahead of the meetings that there will be an opportunity at each meeting to ask questions and to present comments and ideas. Also, for the public's active participation in the meetings, it is important, for participants to receive the materials that DELCORA will present at the meeting in advance. In addition, if the first public meeting is planned to be used to brief the public, there should be a document available well in advance of the meeting since this is merely historical information.

Section 4.2.3: CSO Newsletters

The mailing list DELCORA suggests is not clearly defined. This should be a hardcopy/USPS newsletter as well as a digital subscription. Sign-in sheets at the public meetings could include a box to check whether you want to be mailed or emailed the newsletter, or to not receive it at all. Providing residents the information through their own personal preferred method ensures better understanding and participation in the process.

Attachment A: Implementation Schedule

The proposed timeline shows DELCORA receiving public comments after the public meetings through the website. Public participants should also be able to submit comments through the mail in addition to providing comments through the website. Even if it is not utilized by the public, it is very important that an offline option is at least available.

Attachment B1, Slideshow

The tone of the references to EPA in the slideshow are inappropriate and should be deleted. For example, the references that "EPA took 10 years to review the 1999 plan" or "The EPA has been systematically . . . targeting wastewater systems" are irrelevant to and may distract interested parties from any meaningful conversation about the plan development. Also, on slide 8, the information is incorrect. There is no Consent Decree between EPA and Philadelphia.

Attachment B3: Sample Press Release

The sample press release should state that the settlement is with both EPA and DEP.

Please provide responses to the following comments:

Comments

In order to make it easier for the public to understand the documents, please consider printing a glossary on the back side to help those following along with presentations where acronyms are used.

In the Executive Summary, the second paragraph of the background section mistakenly gives the PaDEP the acronym USEPA. In the Purpose section, consider changing item *i* on page ES2 from "Address the impact of DELCORA's CSOs and LTCP on environmental justice populations" to "Address the impact of DELCORA's CSOs and LTCP on environmental justice communities."

In Section 2.5, would it be possible to have each of the public meetings digitally streamed? This may provide for maximum community involvement.

In Section 4.2.2., the PPP says that the website tab which houses all this information will be called "DELCORA CSO LTCPU". This may (and will likely be confusing to average citizens. DELCORA should consider naming the tab something easier, more straightforward and with less of an acronym. In addition, based on the screenshots DELCORA provided of its CSO website, it is not clear where to find the information. A banner ad on the home page would be helpful. Another possibility is a large button that clearly directs people to the clearinghouse section. It could be labelled Community Involvement, Public Participation, Public Information, etc. Finally, will the website provide a means for interested parties to sign up to receive the newsletter?

Please resubmit the Public Participation Plan after addressing the above concerns and responding to comments. Please feel free to contact me at 215-814-2097 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'A. Seligman', written over a light blue horizontal line.

Andrew F. Seligman, Environmental Scientist
Water Enforcement Branch

cc: R. Smolski, EPA
P. Yeany, EPA
M. DeSantis, DELCORA
J. Fields, PADEP
S. O'Neil, PADEP

Finizio, Marlene

From: DiSantis, Michael <disantism@delcora.org>
Sent: Thursday, February 25, 2016 2:14 PM
To: Bothwell, Ed; Pileggi, John; Centrone, Joe; Hope, Michael; Finizio, Marlene; Roger Lehman; Isler, Lindsey
Cc: Willert, Robert; Peg Hill
Subject: Feedback from EPA on H&H Model and Typical Hydrological Year Submittals

EPA has informed me that they will be approving the H&H model but have some questions and will require some revisions to the Typical Hydrological Year. I have set up a conference call with Andrew Seligman of EPA for the beginning of our next progress meeting on 3/2 so the team can hear his concerns and questions with the goal of hopefully resolving the issues at that time. Andrew gave me a few examples - section 2.1 where 6 hours between events is used and the CD requires 12 hours. Another example is where we state 10 year event we mean 10 year storm. Overall, the issues seem to be ones that can be resolved without undue hardship. While I asked Andrew to put a bullet list together of concerns prior to our meeting, he said his schedule may not allow him to get this done.

Any questions, please contact me.

Thanks

Michael J. DiSantis
Director of Operations and Maintenance
DELCORA
P.O. Box 999
Chester, PA 19016
Office - 610.876.5523 ext. 264
Fax - 610.497.7951
disantism@delcora.org
www.delcora.org



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAR 01 2016

Mr. Robert Willert, Executive Director
Delaware County Regional Quality Control Authority
100 East Fifth Street
Chester, PA 19013

RE: Civil Action 2:15-cv-04652-RB

Dear Mr. Willert:

The United States Environmental Protection Agency (EPA) has received the Delaware County Regional Quality Control Authority (DELCORA) Hydrologic and Hydraulic Model Update and Calibration Plan. EPA has consulted with the Pennsylvania Department of the Environment (PaDEP).

EPA hereby approves the plan with the understanding that the term "two days" as stated in paragraph 5.1.2.1 (Dry Weather Overflow Analysis) shall mean 48 hours.

Thank you for your continued cooperation with this matter. Please do not hesitate to contact me at (215)814-2097 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew F. Seligman", is written over a horizontal line.

Andrew F. Seligman, Environmental Scientist
Water Enforcement Branch

cc: R. Smolski, EPA
P. Yeany, EPA
M. DeSantis, DELCORA



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Certified Mail
Orig. Adm. File Copy
MAR 29 2016
BY 2016-0421
PDF

Mr. Robert Willert, Executive Director
Delaware County Regional Quality Control Authority
100 East Fifth Street
Chester, PA 19013

MAR 24 2016

cc via email:
LTCP group

RE: Civil Action 2:15-cv-04652-RB

Dear Mr. Willert:

The United States Environmental Protection Agency (EPA) has received the Delaware County Regional Quality Control Authority (DELCORA) Identification of Sensitive Area Analysis (ISAA). EPA has consulted with the Pennsylvania Department of the Environment (PaDEP). EPA is unable to approve the ISAA until the following concerns are addressed:

Intro:

Page 1-4 Last paragraph indicates "DELCORA's operating policy limits this flow to 13.3 MGD." This is inconsistent with the third paragraph on page 1.1.

Sensitive Areas:

- The report indicates that the CSO Control Policy defines sensitive areas to include "waters with threatened or endangered species or their designated critical habitat". The report indicates that the area studied does not include critical habitat for Atlantic Sturgeon and Shortnose Sturgeon so the tidal Delaware would not be considered a sensitive area. This appears to be an incorrect interpretation of the sensitive area definition because it does include "waters with". It is also proposed to include critical habitat
- The report indicates that PF&BC did not provide a response to Greeley and Hansen's letter regarding sensitive areas. PF&BC responded in a letter dated 12/22/2015. Atlantic Sturgeon (Pa Endangered, Federal Threatened), Shortnose Sturgeon (Pa Endangered, Federal Endangered), and Eastern Redbelly Turtle (Pa Threatened) are all found within DELCORA CSO influenced waters. Based on this information, in accordance with EPA's CSO Control Policy, the tidal Chester Creek, Ridley Creek and tidal Delaware should be considered sensitive areas.
- NOAA will be publishing a proposed rule designating critical habitat for the New York Bight Distinct Population Segment of Atlantic Surgeon (includes Delaware Bay/River population) on May 27, 2016. For Pennsylvania, the draft critical habitat designation includes the Delaware River



Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474

from Washington Crossing (RM 142) downstream to the Pa/De state line (RM 79), excluding the area around the Naval Yard Complex in Philadelphia. This would encompass tidal waters influenced by DELCORA's CSO outfalls (personal communication, Greg Murphy, PF&BC Area 6 Fisheries Management).

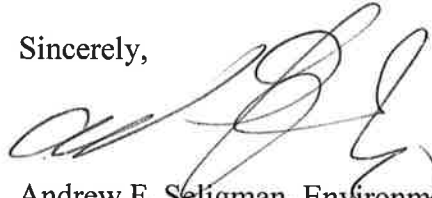
- PF&BC Area 6 fisheries biologists encountered large numbers of young-of-year American Shad in the tidal Chester Creek during their last survey, indicating that this area may serve as an important nursery for this migratory fish species. This data illustrates the potential for added environmental significance for the tidal Chester Creek.
- EPA and PaDEP agree with DELCORA's recommendation of including the non-tidal Ridley below CSO #33 as a priority area. This reach of creek is within a park (good public access), is TSF, and is utilized by fisherman.
- The fishing pier and boat ramp owned by the Chester County Economic Development Authority should be considered priority areas because of their importance as public access areas to the river, and has potential for secondary water contact (CSO's in close proximity to the boat ramp).
- NOAA's Emergency Response Division has produced updated Environmental Sensitivity Index (ESI) Maps for Delaware Bay (2014) <http://response.restoration.noaa.gov/maps-and-spatial-data/download-esi-maps-and-gis-data.html>. These maps were developed for referral during oil spills, but also provide valuable information on environmentally sensitive areas that EPA and PaDEP think Greeley and Hansen should have considered for this report.
- NOAA indicates in the report that the Delaware is attaining for recreational use based on DRBC sampling. DRBC is not sampling in the near-shore Delaware (for example the boat ramp that is bracketed by CSOs), and they would not be targeting CSO events. It seems reasonable that bacteria concentrations at DRBC's sample stations may not be representative of the Delaware along the Chester waterfront.

Pollutants of Concern:

- Similar to Fecal coliform, Enterococcus, and E.coli, Biological Oxygen Demand (BOD), and Total Suspended Solids (TSS) are primary pollutants typically associated with CSO discharges that do not have water quality criteria but can adversely impact in-stream dissolved oxygen concentrations. Philadelphia Water Department, utilizing continuous instream monitoring, has documented low dissolved oxygen conditions in the CSO influenced tidal Frankford Creek. DEP recommends that DELCORA includes BOD and TSS as Pollutants of Concern so they are included for further investigation and possible modeling. Additionally, DELCORA should consider continuous instream monitoring for dissolved oxygen in the tidal Chester and tidal Ridley Creeks. This data would provide valuable information on potential impacts associated with CSO organic enrichment on these tidal creeks.
- This comment pertains to the decision tree (Figure 3-3) and the discussion on page 3-26. EPA and PaDEP believe items 2 and 3 should be independent triggers for moving forward in the decision tree to "Detected in CSO Discharge Sampling?"

- On page 3-28, the 3rd paragraph indicates that PCBs were found to be at a lower level than the Reporting Detection Limit. However, it doesn't identify the test method used. Most of the discharges are using test method 1668a in order to quantify PCBs. That information might be in Attachment I but that font is too small making the entire chart unreadable.
- DELCORA did not sample for hardness in the tidal tribs (probably should have); nor did they sample for Al or Fe in the tidal tributaries. Al, Cu, Pb, and Fe are elevated above in-stream criteria in many of the discharge samples, but are not extreme. Please explain why these pollutants are not identified and Pollutants of Concern.

Sincerely,



Andrew F. Seligman, Environmental Scientist
Water Enforcement Branch

cc: R. Smolski, EPA
P. Yeany, EPA
M. DeSantis, DELCORA

Finizio, Marlene

From: DiSantis, Michael <disantism@delcora.org>
Sent: Wednesday, March 30, 2016 2:24 PM
To: Roger Lehman; Bothwell, Ed; Finizio, Marlene; Hope, Michael; Shah, Nishant; Pileggi, John
Subject: Fwd: Typical year "Typical Hydrologic Period Report Disapproval"

Michael J. DiSantis
Director of Operations and Maintenance
DELCORA
P.O. Box 999
Chester, PA 19016
Office - 610.876.5523 ext. 264
Cell - 484.574.7704
Fax - 610.497.7951
disantism@delcora.org<mailto:disantism@delcora.org>
www.delcora.org<http://www.delcora.org>

Begin forwarded message:

From: "Seligman, Andrew" <Seligman.Andrew@epa.gov<mailto:Seligman.Andrew@epa.gov>>
Date: March 29, 2016 at 2:18:42 PM EDT
To: "DiSantis, Michael" <disantism@delcora.org<mailto:disantism@delcora.org>>
Cc: "Yeany, Philip" <Yeany.Philip@epa.gov<mailto:Yeany.Philip@epa.gov>>, " O'Neil, Steve" <stoneil@pa.gov<mailto:stoneil@pa.gov>>
Subject: Typical year "Typical Hydrologic Period Report Disapproval"

Hi Mike,

This e-mail serves to tell you EPA is not able approve the subject report dates November, 2015. Given our recent discussions, it is my understanding DELCORA will be submitting a revised report sometime in April based on those discussions.

Please contact me if you have any questions.

Thank You
Andrew F. Seligman
Environmental Scientist & Enforcement Officer NDPES Enforcement Branch
1650 Arch Street, 3WP42
Philadelphia, Pennsylvania
19103
(215)814-2097

"The Wind and Waves are always on the side of the ablest Navigators"
Edward Gibbon, English Historian 1734-1794

"There is no education like adversity"
Benjamin Disraeli, British Prime Minister



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

April 14, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Public Participation Plan Report (Updated April 2016)

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing an updated copy of the above mentioned report in response to comments noted in the USEPA letter dated February 18, 2016.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email w/o enclosure
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

April 27, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Consent Decree
Alternatives Evaluation Approach Report – Final

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing a copy of the above mentioned report in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

April 28, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Typical Hydrologic Period Report - Final (Updated April 2016)

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing an updated copy of the above mentioned report in response to USEPA/PADEP concerns received February 25 and March 3, 2016.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email w/o enclosure
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

April 28, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Report - Public Meeting No. 1 Notes

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing a copy of the above mentioned report on Public Meeting No. 1 held on March 15, 2016.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email w/o enclosure
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

APR 28 2016

CERTIFIED MAIL

Mr. Robert Willert, Executive Director
Delaware County Regional Quality Control Authority
100 East Fifth Street
Chester, PA 19013

RE: Civil Action 2:15-cv-04652-RB

Dear Mr. Willert:

The United States Environmental Protection Agency (EPA) has received the revised Delaware County Regional Quality Control Authority (DELCORA) Public Participation Plan (PPP) dated April 14, 2016. EPA has consulted with the Pennsylvania Department of the Environment (PADEP). EPA accepts the revised PPP and therefore it is now approved.

Sincerely,

A handwritten signature in blue ink, likely belonging to Andrew F. Seligman, is positioned above the typed name.

Andrew F. Seligman, Environmental Scientist
Water Enforcement Branch

cc: R. Smolski, EPA
P. Yeany, EPA
M. DeSantis, DELCORA
Jen Field, PADEP, SERO



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

May 13, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Draft Financial Capability Assessment Report

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing a copy of the above mentioned report in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

May 18, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Consent Decree
Updated Identification of Sensitive Areas and Pollutants of
Concern Report to Address USEPA Comments

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is enclosing a copy of the above mentioned report in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
enclosure

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAY 23 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael J. DiSantis, Director
Operations & Maintenance
Delaware County Regional Quality Control Authority
100 East Fifth Street
Chester, PA 19013

RE: Civil Action 2:15-cv-04652-RB

Dear Mr. Disantis:

The United States Environmental Protection Agency (EPA) has received the Delaware County Regional Quality Control Authority (DELCORA) Typical Hydrologic Period Report (Updated April 2016). EPA has consulted with the Pennsylvania Department of the Environment (PaDEP). EPA hereby approves the subject plan.

Thank you for your continued cooperation with this matter. Please do not hesitate to contact me at (215) 814-2097 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Seligman", is written over a horizontal line.

Andrew F. Seligman, Environmental Scientist
Water Enforcement Branch

cc: R. Smolski, EPA
P. Yeany, EPA
M. DiSantis, DELCORA
S. O'Neil, PaDEP SERO
J. Fields, PaDEP SERO



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

June 17, 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andrew F. Seligman
Senior Environmental Scientist and
Enforcement Officer
U.S. EPA, Region 3
1650 Arch Street (3WP42)
Philadelphia, PA 19103-2029

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972

Dear Mr. Seligman:

Per condition B.26. in Article V. - Compliance Measures of the above mentioned action, DELCORA is required to place the new EPS-1 Pump Station into operation by December 31, 2018. By this letter, the Authority is requesting to extend this deadline to December 31, 2019. While the design for the new facility has been underway for some time and is approximately 30% complete, we are concerned that the land acquisition needed for the facility as well as the permitting and approvals required by PADEP, Delaware County, and Chester City will negatively affect the timeline for the project thereby preventing compliance with this condition. If granted this extension, we would continue to use the December 31, 2018 date as our target but don't want to fall short of compliance due to the aforementioned issues.

If you would like to discuss this in further detail, we would be glad to either meet or hold a conference call with EPA and PA DEP. Thank you in advance for your consideration. Please feel free to contact me with any questions.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

Andrew F. Seligman
USEPA, Region 3
June 17, 2016
page 2

cc: via email
Jenifer Fields, PADEP
Steve O'Neil, PADEP
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

June 17, 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andrew F. Seligman
Senior Environmental Scientist and
Enforcement Officer
U.S. EPA, Region 3
1650 Arch Street (3WP42)
Philadelphia, PA 19103-2029

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972

Dear Mr. Seligman:

Per condition A.14.e in Article V. - Compliance Measures of the above mentioned action, DELCORA is required to provide EPA and PADEP with the technical data documenting the results and quality of the rainfall and flow monitoring data. This condition doesn't specify what is considered quarterly and when the report would be due following a quarterly period. To clarify, we propose the following for reporting. Reports would be based on calendar year quarters with the report due by the first of the month following the end of a quarter. As an example, we began recording rainfall and flow monitoring data at all sites on March 17, 2016. Therefore, by July 1, 2016, the Authority would provide the required report for all data collected through June 30, 2016. Subsequent reports would then be due the first of the month following the end of each calendar year quarter until the 12 months of data has been compiled.

If you would like to discuss this in further detail, we would be glad to either meet or hold a conference call with EPA and PA DEP. Thank you in advance for your consideration. Please feel free to contact me with any questions.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

Andrew F. Seligman
USEPA, Region 3
June 17, 2016
page 2

cc: via email
Jenifer Fields, PADEP
Steve O'Neil, PADEP
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

June 21, 2016

FED EX – NEXT DAY

Andrew F. Seligman
Senior Environmental Scientist and
Enforcement Officer
U.S. EPA, Region 3
1650 Arch Street (3WP42)
Philadelphia, PA 19103-2029

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Correction

Dear Mr. Seligman:

Per condition A.14.e in Article V. - Compliance Measures of the above mentioned action, DELCORA is required to provide EPA and PADEP with the technical data documenting the results and quality of the rainfall and flow monitoring data. This condition doesn't specify what is considered quarterly and when the report would be due following a quarterly period. To clarify, we propose the following for reporting. Reports would be based on calendar year quarters with the report due by the first of the month following the end of a quarter. As an example, we began recording rainfall and flow monitoring data at all sites on March 17, 2016. Therefore, by August 1, 2016, the Authority would provide the required report for all data collected through June 30, 2016. Subsequent reports would then be due by the first day of the second month following the end of each calendar year quarter until the 12 months of data has been compiled.

If you would like to discuss this in further detail, we would be glad to either meet or hold a conference call with EPA and PA DEP. Thank you in advance for your consideration. Please feel free to contact me with any questions.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

Andrew F. Seligman
USEPA, Region 3
June 21, 2016
page 2

cc: via email
Jenifer Fields, PADEP
Steve O'Neil, PADEP
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

Appendix 3

NPDES Permit Exceedance Report

(NO REPORTS SUBMITTED DURING
JANUARY 2016 TO JUNE 2016)

Appendix 4

CSOs, SSOs and Unpermitted Discharges Correspondence



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

February 17, 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chief, Environmental Enforcement Section
Environment and Natural
Resources Division
U.S. Department of Justice
P. O. Box 7611, Ben Franklin Station
Washington, DC 20004-7611
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Notice of Violation

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is advising that a SSO event occurred on February 16, 2016. I am attaching a report for your review which provides the details associated with the event, in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
attachment

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

Please check the appropriate box ☐ Dry Weather Overflow ☒ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 2/16/2016 Name : Patrick A Henry Sr Phone # : (610) 876-5523 ext. 293
2. Your organization name and address ?	Name: DELCORA County: Delaware Township/Municipality: Address: P.O. Box 999, Chester, PA 19016
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 2/16/2016 Location(Street & #): Central Delaware PS Sellers Avenue Municipality: Ridley Township County: Delaware
4. How was SSO discovered? By whom ?	Overflow was observed by DELCORA personnel as an alarm on SCADA.
5. Start and end time of SSO (actual or estimate?)	Start: Approximately 1:38 PM Stopped: Approximately 2.01 PM
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 2/16/16 Time : Approximately 2:48 PM Name : Tom Czwalina
7. Description and actual or estimated volume of SSO	Sanitary wastewater, volume unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Overflow flowed to a tributary of Darby Creek that is adjacent to the pump station.
9. What caused SSO ? How was it stopped ?	Heavy rain caused very high flows to the station. Crews responded to the station and ran the Bar screen in hand to help clear debris. All pumps were in service during bypass.
10. Describe extent of contamination and how it was cleaned up	No debris or contamination observed as creek level was very high, muddy, and flowing rapidly at the time of the overflow.
11. What actions will be taken to prevent a re-occurrence ? When ?	N/A
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	None



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

February 18, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Notice of Violation

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is advising that a SSO event occurred on February 18, 2016. I am attaching a report for your review which provides the details associated with the event in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:smf
Attachment

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 2/18/16 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 2/18/16 Municipality: Chester city Location(Street & #): Front and Hayes CSO #004 County: Delaware
4. How was SSO discovered? By whom ?	Delcora crew during daily CSO checks.
5. Start and end time of SSO (actual or estimate?)	Start time unknown - ended 2/18/16 @7:35am. CSO last checked 2/17/16 @7:26am
6. Date, time and name of person who called PADEP originally to notify of SSO ?	2/18/15 at 7:55 AM by M. Warholic
7. Description and actual or estimated volume of SSO	Unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Delaware river
9. What caused SSO ? How was it stopped ?	Rags partially blocking pipe between trunk line and regulator.Heavy rain on 2/16/16
10. Describe extent of contamination and how it was cleaned up	N/A
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with O&M program that includes daily checks
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

February 29, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Notice of Violation

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is advising that a SSO event occurred on February 26, 2016. I am attaching a report for your review which provides the details associated with the event in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
attachment

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 2/26/16 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 2/26/16 Municipality: Chester city Location(Street & #): Rainey st. CSO #007 County: Delaware
4. How was SSO discovered? By whom ?	Delcora crew working on Godwin pump on Delaware interceptor
5. Start and end time of SSO (actual or estimate?)	Start - approximately 1:00pm.Crew had a temporary interceptor pump set up to draw flows down in interceptor post rain events.Had a failure on the pump, had to switch out with another Godwin pump.During this transistion the interceptor and regulator was handling all the flow it could,during this time frame we had some overflow to Delaware river.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	2/26/16 @ 2:55pm M. Warholic
7. Description and actual or estimated volume of SSO	Unknown at this time. Flow will be calculated by model for DMR submission.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Delaware River
9. What caused SSO ? How was it stopped ?	Post heavy rain event, and temporary relief pump failure. Stopped by setting up a another interceptor relief pump.
10. Describe extent of contamination and how it was cleaned up	N/A
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with O&M program that includes daily checks. Also, we will be formalizing the interceptor relief pumping system as this area is prone to slow recovery following rain events. Until the system is made permanent, we will continue with temporary pumping on an as-needed basis.
12. Other comments ?	None
13.Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

1 From Please print and press hard.

Date **2/29/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

SSO report

3 To

Recipient's Name **Chief, Environmental Enforcement Section** Phone (**202**) **514-2757**

Company **US Dept. of Justice**

Address **Environment & Natural Resources Div.**

Address **DOJ No. 90-5-1-1-10972** HOLD **Weekday** (FedEx location address REQUIRED, NOT available for FedEx First Overnight.)

Address **601D Street NW** HOLD **Saturday** (FedEx location address REQUIRED, Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.)

City **Washington, DC** State State ZIP **20004**



Get transit times. Schedule pickups.
Create labels. Go to fedex.com.

1 From Please print and press hard.

Date **2/29/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

SSO report

3 To

Recipient's Name **Chief, NPDES Enforcement Branch** Phone (**215**) **814-2097**

Company **US EPA - Region 3**

Address **Water Protection Division**

Address **1650 Arch Street** HOLD **Weekday** (FedEx location address REQUIRED, NOT available for FedEx First Overnight.)

Address **Philadelphia** HOLD **Saturday** (FedEx location address REQUIRED, Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.)

City **Philadelphia** State **PA** ZIP **19103-2029**



Ship it. Track it. Pay for it. All online.
Go to fedex.com.

4 Express Package Service

* To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options

- ☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery. *Fee applies.*
- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. *Fee applies.*

Does this shipment contain dangerous goods?

- ☒ **No** ☐ **Yes** As per attached Shipper's Declaration. ☐ **Yes** Shipper's Declaration not required.
- ☐ **Dry Ice** Dry Ice, 9, UN 1845 _____ x _____ kg
- ☐ **Cargo Aircraft Only**
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

7 Payment Bill to:

- Sender's Account No. in Section will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
- FedEx Acct. No. Credit Card No. Exp. Date

Total Packages **1** Total Weight _____ lbs. Total Declared Value* \$ _____

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

MUR 1

4 Express Package Service

* To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options

- ☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery. *Fee applies.*
- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. *Fee applies.*

Does this shipment contain dangerous goods?

- ☒ **No** ☐ **Yes** As per attached Shipper's Declaration. ☐ **Yes** Shipper's Declaration not required.
- ☐ **Dry Ice** Dry Ice, 9, UN 1845 _____ x _____ kg
- ☐ **Cargo Aircraft Only**
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

7 Payment Bill to:

- Sender's Account No. in Section will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
- FedEx Acct. No. Credit Card No. Exp. Date

Total Packages **1** Total Weight _____ lbs. Total Declared Value* \$ _____

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date 2/29/2016 Sender's FedEx Account Number 1060-5969-1

Sender's Name M. J. DiSantis / bab Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2 Dept./Floor/Suite/Room

City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference

First 24 characters will appear on invoice. SSO report

3 To

Recipient's Name Philip Yeany Phone (215) 814-2359

Office of Regional Counsel (3RC20)

Company US EPA, Region 3

Address 1650 Arch Street HOLD Weekday
We cannot deliver to P.O. boxes or P.O. ZIP codes. REQUIRED, NOT available for
FedEx First Overnight.

Address Philadelphi HOLD Saturday
Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED, Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

City Philadelphia State PA ZIP 19103-2029

0119850666



FedEx at your fingertips. Good call.
Go to fedex.com/mobilesolutions

1 From Please print and press hard.

Date 2/29/2016 Sender's FedEx Account Number 1060-5969-1

Sender's Name M. J. DiSantis/bab Phone (610) 876-5523

Company DELCORA

Address 100 E 5TH ST FL 2 Dept./Floor/Suite/Room

City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference

First 24 characters will appear on invoice. SSO report

3 To

Recipient's Name Program Manager-Clean Water Phone (484) 2505970

Program

Company PADEP - SERO

Address 2 East Main Street HOLD Weekday
We cannot deliver to P.O. boxes or P.O. ZIP codes. REQUIRED, NOT available for
FedEx First Overnight.

Address Norristown HOLD Saturday
Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED, Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

City Norristown State PA ZIP 19401

0119850666



Learn to pack like a pro.
Go to fedex.com/packaging

4 Express Package Service

NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- ☒ FedEx Envelope* ☐ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.

- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery. Fee applies.

- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

- One box must be checked.
- ☒ No ☐ Yes As per attached Shipper's Declaration. ☐ Yes Shipper's Declaration not required.

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

- ☐ Dry Ice Dry Ice, 9, UN 1845 x kg ☐ Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

- ☒ **Sender** Act. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

Total Packages 1 Total Weight 1 lbs. Total Declared Value* \$ 00

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

4 Express Package Service

NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- ☒ FedEx Envelope* ☐ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options

- ☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.

- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery. Fee applies.

- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

- One box must be checked.
- ☒ No ☐ Yes As per attached Shipper's Declaration. ☐ Yes Shipper's Declaration not required.

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

- ☐ Dry Ice Dry Ice, 9, UN 1845 x kg ☐ Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

- ☒ **Sender** Act. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

Total Packages 1 Total Weight 1 lbs. Total Declared Value* \$ 00

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

March 14, 2016

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Notice of Violation

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is advising that a SSO event occurred on March 11, 2016. I am attaching a report for your review which provides the details associated with the event in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
attachment

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 3/14/2016 Name : Jim Cartafalsa Phone # : (610) 876-5523 ext. 215
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 3/11/16 Municipality: Chester city Location(Street & #): Manhole #995 near 12th & Parker County: Delaware
4. How was SSO discovered? By whom ?	Received a call from a resident to the sewer complaint emergency line stating that she noticed sewage running into Chester creek. Manhole is located in a wooded area and was noticed by the resident when taking a walk.
5. Start and end time of SSO (actual or estimate?)	Start is unknown. The call was received at 3:17 pm and staff was immediately sent out. Overflow ended at approximatey 4:45 PM.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	3/11/16 @ 4:18pm J. Cartafalsa
7. Description and actual or estimated volume of SSO	Volume of overflow is unknown.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Sanitary wastewater overflowed to the surrounding ground and some into the Chester Creek
9. What caused SSO ? How was it stopped ?	Grease and rags were removed from the line which stopped overflow.
10. Describe extent of contamination and how it was cleaned up	Area is being cleaned by staff with all debris removed.
11. What actions will be taken to prevent a re-occurrence ? When ?	Continue with O&M program that will include further cleaning and televising.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

1 From Please print and press hard.

Date **3/14/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2**

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference SSO Report

3 To Recipient's Name **Philip Yeany** Phone (**215**) **814-2359**

Office of Regional Counsel (3RC20)

Company

Address **USEPA, Region 3**

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address **1650 Arch Street**

Use this line for the HOLD location address or for continuation of your shipping address.

City **Philadelphia** State **PA** ZIP **19103-2029**

HOLD Weekday
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

HOLD Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.



Learn to pack like a pro.
Go to fedex.com/packaging.

1 From Please print and press hard.

Date **3/14/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2**

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference SSO Report

3 To Recipient's Name **Program Manager -** Phone (**484**) **250-5970**

Clean Water Program

Company

Address **PADEP - SERO**

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address **2 East Main Street**

Use this line for the HOLD location address or for continuation of your shipping address.

City **Norristown** State **PA** ZIP **19401**

HOLD Weekday
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

HOLD Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.



Get transit times. Schedule pickups.
Create labels. Go to fedex.com.

4 Express Package Service *To most locations.

NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options

- ☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.
- Does this shipment contain dangerous goods?
One box must be checked.
- ☒ **No** ☐ **Yes** As per attached Shipper's Declaration ☐ **Yes** Shipper's Declaration not required.
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.
- ☐ **Dry Ice** Dry Ice, 9 UN 1845 x kg ☐ **Cargo Aircraft Only**

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
- ☒ **Sender** Acct. No. in Section 1 will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
- Total Packages **1** Total Weight **1** lbs. Total Declared Value* **00**

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date **3/14/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2**

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference SSO Report

3 To Recipient's Name **Program Manager -** Phone (**484**) **250-5970**

Clean Water Program

Company

Address **PADEP - SERO**

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address **2 East Main Street**

Use this line for the HOLD location address or for continuation of your shipping address.

City **Norristown** State **PA** ZIP **19401**

HOLD Weekday
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

HOLD Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.



Get transit times. Schedule pickups.
Create labels. Go to fedex.com.

4 Express Package Service *To most locations.

NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options

- ☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery. Fee applies.
- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.
- Does this shipment contain dangerous goods?
One box must be checked.
- ☒ **No** ☐ **Yes** As per attached Shipper's Declaration ☐ **Yes** Shipper's Declaration not required.
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.
- ☐ **Dry Ice** Dry Ice, 9 UN 1845 x kg ☐ **Cargo Aircraft Only**

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
- ☒ **Sender** Acct. No. in Section 1 will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
- Total Packages **1** Total Weight **1** lbs. Total Declared Value* **00**

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 2/12 • Part #163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date **3/14/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2**

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

First 24 characters will appear on invoice. **SSO report-DOJ No. 90-5-1-1-**

3 To Recipient's Name **Chief, Environmental Enforcement Section** Phone (**202**) **514-2757**

Company **US DOJ**

Address **601D Street NW**

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address **Washington, DC**

City **Washington, DC** State **DC** ZIP **20004**

☐ **HOLD Weekday**
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

☐ **HOLD Saturday**
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.



Ship it. Track it. Pay for it. All online.
Go to fedex.com.

0119850666

1 From Please print and press hard.

Date **3/14/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **M. J. DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2**

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

First 24 characters will appear on invoice. **SSO Report**

3 To Recipient's Name **Chief, NPDES Enforcement Branch (3WP42)** Phone (**215**) **814-2097**

Company **Water RXX Protection Div**

Address **USEPA, Region 3**

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address **1650 Arch Street**

City **Philadelphia** State **PA** ZIP **19103-2020**

☐ **HOLD Weekday**
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

☐ **HOLD Saturday**
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.



FedEx at your fingertips. Good call.
Go to fedex.com/mobilesolutions.

0119850666

4 Express Package Service

* To most locations.

NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.

For packages over 150 lbs., use the new FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options

☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.

☐ **Direct Signature**
Someone at recipient's address may sign for delivery. *Fee applies.*

☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. *Fee applies.*

Does this shipment contain dangerous goods?

- ☒ **No** ☐ **Yes** As per attached Shipper's Declaration ☐ **Yes** Shipper's Declaration not required.
- ☐ **Dry Ice** Dry Ice, 9 UN 1845 x kg ☐ **Cargo Aircraft Only**

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☒ **Sender** ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**

FedEx Acct. No. Credit Card No.

Total Packages **1** Total Weight **1** lb. Total Declared Value* **00**

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 2/12 • Part 163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

611

4 Express Package Service

* To most locations.

NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.

For packages over 150 lbs., use the new FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options

☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.

☐ **Direct Signature**
Someone at recipient's address may sign for delivery. *Fee applies.*

☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. *Fee applies.*

Does this shipment contain dangerous goods?

- ☒ **No** ☐ **Yes** As per attached Shipper's Declaration ☐ **Yes** Shipper's Declaration not required.
- ☐ **Dry Ice** Dry Ice, 9 UN 1845 x kg ☐ **Cargo Aircraft Only**

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☒ **Sender** ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**

FedEx Acct. No. Credit Card No.

Total Packages **1** Total Weight **1** lb. Total Declared Value* **00**

Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 2/12 • Part 163134 • ©1994-2012 FedEx • PRINTED IN U.S.A. SRM

611



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

May 2, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Notice of Violation

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is advising that a SSO event occurred on April 26, 2016. I am attaching a report for your review which provides the details associated with the event in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
attachment

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email w/attachment
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Michael DiSantis 610-876-5523 ext. 264 4/27/16
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 4/26/16 Municipality: Chester City Location: 3201 W. Front Street (WRTP) County: Delaware
4. How was SSO discovered? By whom ?	Plant staff observed manhole on plant recycle flow (PRF) pump station gravity line overflowing.
5. Start and end time of SSO (actual or estimate?)	The incident started at approximately 10:30 PM and ended at approximately 1:00 AM on 4/27/16.
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 4/27/16 Time : Approximately 1:35 AM Name : Dave Voshelle
7. Description and actual or estimated volume of SSO	Volume unknown. Plant recycle flow consists of sanitary waste, rain water from truck waste containment areas, sludge dewatering and thickening filtrate, and secondary clarifier scum flow.
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Wastewater spilled onto asphalt out of a manhole of the gravity line to the pump station, with some flow eventually entering a stormwater inlet.
9. What caused SSO ? How was it stopped ?	Overflow was caused by a failure of one of the two pumps in the station. Overflow was stopped when a second portable stand-by pump was put into service. The pump manufacturer recently had a recall on the model of pump that is used at the pump station. One of the pumps was already out of service to address the recall. The pump that failed had recently been repaired and installed within the past two weeks. The pump that we keep as a spare is also out for service.
10. Describe extent of contamination and how it was cleaned up	Wastewater flowed on to asphalt around manholes and flowed across driveway. With some of the overflow entering storm drain inlets. Due to rain event, there was no accumulated debris so no clean up was needed.
11. What actions will be taken to prevent a re-occurrence ? When ?	All three pumps are being repaired which will leave two pumps in service and one spare on the shelf. Additionally, the portable stand-by pumps will remain available. A project currently in design will eliminate this pump station by the end of 2018.
12. Other comments ?	Additional stand-by pumps have been added to the system until a permanent repair can be made. This station is scheduled to be replaced during an upgrade that is underway.
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

May 18, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Notice of Violation

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is advising that a SSO event occurred on May 17, 2016. I am attaching a report for your review which provides the details associated with the event in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
attachment

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

cc: via email w/attachment
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

Please check the appropriate box ☒ Dry Weather Overflow , ☐ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 5/17/16 Name : Mike Warholic Phone # : (610) 876-5523 ext. 243
2. Your organization name and address ?	Name: DELCORA County: Delaware Address: P.O. Box 999, Chester, PA 19016 Township/Municipality: Chester City
Sewer system owner and permit number	DELCORA - NPDES No. PA0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 5/17/16 Municipality: Parkside boro Location(Street & #): Park Valley lane into wooded area Delcora pipeline segment 3417. County: Delaware
4. How was SSO discovered? By whom ?	Resident taking a walk
5. Start and end time of SSO (actual or estimate?)	Start time undetermined. SSO ended at approximately 1:00pm 5/17/16
6. Date, time and name of person who called PADEP originally to notify of SSO ?	5/17/16 DEP notified Delcora via Mike DiSantis at approximately 11:15am
7. Description and actual or estimated volume of SSO	No estimate for volume
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	A small stream on the Parkside Brookhaven border that dumps into Ridley Creek
9. What caused SSO ? How was it stopped ?	Tree roots, and it appears the roots broke the sewer pipe. Delcora contractor will be making the pipe repair 5/18/16
10. Describe extent of contamination and how it was cleaned up	Contamination mostly contained in small stream. Hay bales where placed across the stream at three sites to capture any solids. Cleanup ongoing, crews pumping creek out into a Delcora sanitary manhole
11. What actions will be taken to prevent a re-occurrence ? When ?	Once the pipe repair has been completed, a pipe line assesment will be made and any and all corrective actions will be taken to prevent another occurrence.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	N/A

1 From Please print and press hard.

Date **5/18/2016** Sender's FedEx Account Number **1060-5969-1**
 Sender's Name **Michael DiSantis/bab** Phone (**610**) **876-5523**
 Company **DELCORA**
 Address **100 E 5TH ST FL 2**
 City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

First 24 characters will appear on invoice. **SSO Report of 5-17-2016**

3 To

Recipient's Name **Philip Yeany** Phone (**215**) **814-2359**
Office of Regional Counsel (3RC20)
 Company **USEPA, Region 3**
 Address **1650 Arch Street**
 We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room
 Address
 Use this line for the HOLD location address or for continuation of your shipping address.
 City **Philadelphia** State **PA** ZIP **19103-2029**

0121191951



Ship it. Track it. Pay for it. All online.
 Go to fedex.com.

4 Express Package Service *To most locations.

Packages up to 150 lbs.
 For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
 Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☒ **FedEx Priority Overnight**
 Next business morning. * Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Standard Overnight**
 Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
 Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
 Second business afternoon. * Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Express Saver**
 Third business day. * Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

- ☐ **Saturday Delivery**
 NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ **No Signature Required**
 Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
 Someone at recipient's address may sign for delivery.
- ☐ **Indirect Signature**
 If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

- One box must be checked.
☒ **No** ☐ **Yes** As per attached Shipper's Declaration. ☐ **Yes** Shipper's Declaration not required. ☐ **Dry Ice** Dry Ice, 3, UN 1845 _____ x _____ kg
 Restrictions apply for dangerous goods — see the current FedEx Service Guide. ☐ **Cargo Aircraft Only**

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
☒ **Sender** Acct. No. in Section I will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
 FedEx Acct. No. Credit Card No. Exp. Date

Total Packages **1** Total Weight _____ lbs. Total Declared Value* \$ _____ .00

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev Date 5/15 • Part #163134 • ©1994–2015 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date **5/18/2016** Sender's FedEx Account Number **1060-5969-1**
 Sender's Name **Michael DiSantis/bab** Phone (**610**) **876-5523**
 Company **DELCORA**
 Address **100 E 5TH ST FL 2**
 City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

First 24 characters will appear on invoice. **SSO Report of 5/17/2016**

3 To

Recipient's Name **Program Manager-Clean Water** Phone (**484**) **250-5970**
Program
 Company **PADEP, SERO**
 Address **2 East Main Street**
 We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room
 Address
 Use this line for the HOLD location address or for continuation of your shipping address.
 City **Norristown** State **PA** ZIP **19401**

0121191951



Shipping online just got easier.
 Go to fedex.com/lite.

4 Express Package Service *To most locations.

Packages up to 150 lbs.
 For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
 Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☒ **FedEx Priority Overnight**
 Next business morning. * Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Standard Overnight**
 Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
 Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
 Second business afternoon. * Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Express Saver**
 Third business day. * Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

- ☐ **Saturday Delivery**
 NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ **No Signature Required**
 Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
 Someone at recipient's address may sign for delivery.
- ☐ **Indirect Signature**
 If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

- One box must be checked.
☒ **No** ☐ **Yes** As per attached Shipper's Declaration. ☐ **Yes** Shipper's Declaration not required. ☐ **Dry Ice** Dry Ice, 3, UN 1845 _____ x _____ kg
 Restrictions apply for dangerous goods — see the current FedEx Service Guide. ☐ **Cargo Aircraft Only**

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
☒ **Sender** Acct. No. in Section I will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
 FedEx Acct. No. Credit Card No. Exp. Date

Total Packages **1** Total Weight _____ lbs. Total Declared Value* \$ _____ .00

*Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev Date 5/15 • Part #163134 • ©1994–2015 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date **5/18/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **Michael DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference SSO Report of 5/17/2016

3 To

Recipient's Name **Chief, Environmental Enforcement Section** Phone (**202**) **514-2757**

Company **US DOJ**

Address **DOJ No. 90-5-1-1-10972** Hold Weekday ☐ FedEx location address REQUIRED. NOT available for FedEx First Overnight.

We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room

Address **601D Street NW** Hold Saturday ☐ FedEx location address REQUIRED. Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Use this line for the HOLD location address or for continuation of your shipping address.

City **Washington, DC** State **DC** ZIP **20004**

0121191951



Deliveries when and where you want.
Learn about FedEx Delivery Manager® at fedex.com/delivery.

4 Express Package Service * To most locations. Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☒ FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

☐ FedEx 2Day A.M.
Second business morning.* Saturday Delivery NOT available.

☐ FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

☒ FedEx Envelope* ☐ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

☐ Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required
Package may be left without obtaining a signature for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery.

☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?
One box must be checked.

☒ No ☐ Yes ☐ Yes ☐ Yes
As per attached Shipper's Declaration. Shipper's Declaration not required.

☐ Dry Ice
Dry Ice, 5, UN 1845 _____ x _____ kg

Restrictions apply for dangerous goods — see the current FedEx Service Guide. ☐ Cargo Aircraft Only

7 Payment Bill to:

Sender ☒ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

Enter FedEx Acct. No. or Credit Card No. below.

FedEx Acct. No. Credit Card No. Exp. Date

Total Packages **1** Total Weight **1** lbs. Total Declared Value* **\$0.00**

*Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 5/15 • Part #163134 • ©1994-2015 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date **5/18/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **Michael DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference SSO Report of 5/17/2016

3 To

Recipient's Name **Chief, NPDES Enforcement Branch (3WP42)** Phone (**215**) **814-2097**

Company **USEPA, Region 3**

Address **1650 Arch Street** Hold Weekday ☐ FedEx location address REQUIRED. NOT available for FedEx First Overnight.

We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room

Address **Philadelphia** Hold Saturday ☐ FedEx location address REQUIRED. Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Use this line for the HOLD location address or for continuation of your shipping address.

City **Philadelphia** State **PA** ZIP **19103-2029**

0121191951



Leave the packing to the pros at FedEx Office.
Go to fedex.com/office.

4 Express Package Service * To most locations. Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☒ FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

☐ FedEx 2Day A.M.
Second business morning.* Saturday Delivery NOT available.

☐ FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

☐ FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

☒ FedEx Envelope* ☐ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

☐ Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required
Package may be left without obtaining a signature for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery.

☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?
One box must be checked.

☒ No ☐ Yes ☐ Yes ☐ Yes
As per attached Shipper's Declaration. Shipper's Declaration not required.

☐ Dry Ice
Dry Ice, 5, UN 1845 _____ x _____ kg

Restrictions apply for dangerous goods — see the current FedEx Service Guide. ☐ Cargo Aircraft Only

7 Payment Bill to:

Sender ☒ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

Enter FedEx Acct. No. or Credit Card No. below.

FedEx Acct. No. Credit Card No. Exp. Date

Total Packages **1** Total Weight **1** lbs. Total Declared Value* **\$0.00**

*Your liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 5/15 • Part #163134 • ©1994-2015 FedEx • PRINTED IN U.S.A. SRM

611



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

May 31, 2016

FED EX – NEXT DAY

Chief, Environmental Enforcement
Section
Environment and Natural
Resources Division
U.S. Department of Justice
601 D Street NW
Washington, DC 20004
Re: DOJ No. 90-5-1-1-10972

Philip Yeany
Office of Regional Counsel (3RC20)
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Chief
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. EPA, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Program Manager – Clean Water Program
PA DEP
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Civil Action Number Case 2:15-cv-04652-RB
& DOJ Case Number 90-5-1-1-10972
Notice of Violations (2)

Dear Sir/Madam:

By this letter, the Delaware County Regional Water Quality Control Authority is advising that two SSO events occurred recently; one at Bridle Way PS and one at Central Delaware PS. I am attaching the reports for your review which provide the details associated with the events in accordance with the requirements of the Consent Decree.

If there are any questions, please contact me. Thank you.

Sincerely,

Michael J. DiSantis
Director of Operations & Maintenance

MJD:bab
attachments

ADMINISTRATION

☐ 610-876-5523
☐ FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

☐ 610-876-5526
☐ FAX: 610-876-1460

PURCHASING & STORES

☐ 610-876-5523
☐ FAX: 610-497-7959

PLANT & MAINTENANCE

☐ 610-876-5523
☐ FAX: 610-497-7950

USDOJ/USEPA/PADEP
Notice of Violation – 2 SSO Reports
May 31, 2016
page 2

cc: via email w/attachment
Margaret Hill, Blank Rome
Marlene Finizio, Greeley and Hansen
Michael Hope, Greeley and Hansen
Ed Bothwell, DELCORA
Charles Hurst, DELCORA
Michael DiSantis, DELCORA
John Pileggi, DELCORA
Robert Willert, DELCORA
File – Consent Order – LTCP CSO

Please check the appropriate box ☐ Dry Weather Overflow ☒ Wet Weather Overflow

1. Date, Name, Phone # of person completing this report	Date : 5/31/16 Name : Michael J. DiSantis Phone # : (610) 876-5523 ext. 264
2. Your organization name and address ?	Name: DELCORA County: Delaware Township/Municipality: Address: P.O. Box 999, Chester, PA 19016
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 5/30/16 Location(Street & #): Central Delaware PS Sellers Avenue Municipality: Ridley Township County: Delaware
4. How was SSO discovered? By whom ?	Overflow was observed by on-site DELCORA personnel.
5. Start and end time of SSO (actual or estimate?)	Start: Approximately 3:45 AM Stopped: Approximately 5:35 AM
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : 5/30/16 Time : Approximately 6:00 AM Name : Dave Voshelle
7. Description and actual or estimated volume of SSO	Sanitary wastewater, volume unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Overflow flowed to a tributary of Darby Creek that is adjacent to the pump station.
9. What caused SSO ? How was it stopped ?	High flows to the station caused by very heavy rain. All pumps were in service during bypass. Bypass ended when flow to station went below capacity of station.
10. Describe extent of contamination and how it was cleaned up	No debris or contamination observed as creek level was very high, muddy, and flowing rapidly at the time of the overflow.
11. What actions will be taken to prevent a re-occurrence ? When ?	N/A
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	None

Please check the appropriate box ☒ Dry Weather Overflow ☐ Wet Weather Overflow

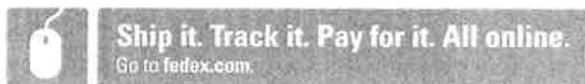
1. Date, Name, Phone # of person completing this report	Date : 5/31/16 Name : Michael J. DiSantis Phone # : (610) 876-5523 ext. 264
2. Your organization name and address ?	Name: DELCORA County: Delaware Township/Municipality: Address: P.O. Box 999, Chester, PA 19016
Sewer system owner and permit number	DELCORA NPDES NO. 0027103
3. Date found and <u>specific</u> location of SSO. Including Municipality/County (if different from #2) ?	Date: 5/31/16 Location(Street & #): Bridle Way PS Municipality: Edgmont Township County: Delaware
4. How was SSO discovered? By whom ?	Overflow was observed by Aqua personnel who then notified DELCORA.
5. Start and end time of SSO (actual or estimate?)	Start: Unknown, overflow observed around 7:30 AM Stopped: Approximately 8:00 AM
6. Date, time and name of person who called PADEP originally to notify of SSO ?	Date : N/A Time : N/A Name : N/A
7. Description and actual or estimated volume of SSO	Sanitary wastewater, volume unknown
8. Where, <u>precisely</u> , did SSO go ? (land, roadway, basement, swale, storm sewer, creek, etc) Please include creek name or street location.	Overflow flowed to a wooded area that is adjacent to the pump station.
9. What caused SSO ? How was it stopped ?	The VFD for pump #1 failed during the station's peak diurnal flow period. No high wet well alarm was received due to on-going issues with Verizon land line service for the auto-dialer. Normal operation resumed once #1 pump was placed in hand mode.
10. Describe extent of contamination and how it was cleaned up	No debris noted only sewage. DELCORA staff will follow up and perform clean up of affected area.
11. What actions will be taken to prevent a re-occurrence ? When ?	A high wet well alarm is being added to the back up float system which will be connected to both SCADA and the auto-dialer. Also, we are adding a cellular connection for the dialer due to the on-going issues with Verizon for land line telephone service.
12. Other comments ?	None
13. Downstream notifications made: (All downstream users such as public water supplies must be notified)	None

1 From Please print and press hard.
 Date 5/31/2016 Sender's FedEx Account Number 1060-5969-1
 Sender's Name Michael DiSantis/bab Phone (610) 876-5523
 Company DELCORA
 Address 100 E 5TH ST FL 2
 City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference 2 SSO Reports
 First 24 characters will appear on invoice.

3 To Recipient's Name Philip Yeany Phone (215) 814-2350
 Office of Regional Counsel (3RC20)
 Company USEPA, REGION 3
 Address 1650 Arch Street
 We cannot deliver to P.O. boxes or P.O. ZIP codes.
 Address
 Use this line for the HOLD location address or for continuation of your shipping address.
 City Philadelphia State PA ZIP 19103-2029

HOLD Weekday
 FedEx location address
 REQUIRED. NOT available for
 FedEx First Overnight.
HOLD Saturday
 FedEx location address
 REQUIRED. Available ONLY for
 FedEx Priority Overnight and
 FedEx 2Day to select locations.



Form ID No 0215

4 Express Package Service *To most locations. Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day	2 or 3 Business Days
<input type="checkbox"/> FedEx First Overnight Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input type="checkbox"/> FedEx 2Day A.M. Second business morning.* Saturday Delivery NOT available.
<input checked="" type="checkbox"/> FedEx Priority Overnight Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input type="checkbox"/> FedEx 2Day Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
<input type="checkbox"/> FedEx Standard Overnight Next business afternoon.* Saturday Delivery NOT available.	<input type="checkbox"/> FedEx Express Saver Third business day.* Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.
☒ FedEx Envelope* ☐ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

☐ Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required
Package may be left without obtaining a signature for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery.

☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?
 One box must be checked.
☒ No ☐ Yes As per attached Shipper's Declaration ☐ Yes Shipper's Declaration not required ☐ Dry Ice Dry ice, 3, UN 1845 x kg
 Restrictions apply for dangerous goods—see the current FedEx Service Guide. ☐ Cargo Aircraft Only

7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below.
☒ Sender Acct. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
 FedEx Acct. No. Credit Card No. Exp. Date
 Total Packages 1 Total Weight lbs. S. Total Declared Value† \$ 00
 *Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.
 Rev. Date 5/15 • Part #163134 • ©1994-2015 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.
 Date 5/31/2016 Sender's FedEx Account Number 1060-5969-1
 Sender's Name Michael DiSantis/bab Phone (610) 876-5523
 Company DELCORA
 Address 100 E 5TH ST FL 2
 City CHESTER State PA ZIP 19013-4508

2 Your Internal Billing Reference 2 SSO Reports
 First 24 characters will appear on invoice.

3 To Recipient's Name Program Manager-Clean Water Program Phone (484) 250-5970
 Company PADEP-SERO
 Address 2 East Main Street
 We cannot deliver to P.O. boxes or P.O. ZIP codes.
 Address
 Use this line for the HOLD location address or for continuation of your shipping address.
 City Norristown State PA ZIP 19401

HOLD Weekday
 FedEx location address
 REQUIRED. NOT available for
 FedEx First Overnight.
HOLD Saturday
 FedEx location address
 REQUIRED. Available ONLY for
 FedEx Priority Overnight and
 FedEx 2Day to select locations.



Form ID No 0215

4 Express Package Service *To most locations. Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day	2 or 3 Business Days
<input type="checkbox"/> FedEx First Overnight Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input type="checkbox"/> FedEx 2Day A.M. Second business morning.* Saturday Delivery NOT available.
<input checked="" type="checkbox"/> FedEx Priority Overnight Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input type="checkbox"/> FedEx 2Day Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
<input type="checkbox"/> FedEx Standard Overnight Next business afternoon.* Saturday Delivery NOT available.	<input type="checkbox"/> FedEx Express Saver Third business day.* Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.
☒ FedEx Envelope* ☐ FedEx Pak* ☐ FedEx Box ☐ FedEx Tube ☐ Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

☐ Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required
Package may be left without obtaining a signature for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery.

☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?
 One box must be checked.
☒ No ☐ Yes As per attached Shipper's Declaration ☐ Yes Shipper's Declaration not required ☐ Dry Ice Dry ice, 3, UN 1845 x kg
 Restrictions apply for dangerous goods—see the current FedEx Service Guide. ☐ Cargo Aircraft Only

7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below.
☒ Sender Acct. No. in Section I will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check
 FedEx Acct. No. Credit Card No. Exp. Date
 Total Packages 1 Total Weight lbs. S. Total Declared Value† \$ 00
 *Our liability is limited to US\$100 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.
 Rev. Date 5/15 • Part #163134 • ©1994-2015 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date **5/31/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **Michael DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

First 24 characters will appear on invoice. **2 SSOs**

3 To Recipient's Name **Chief, Environmental Enforcement Section** Phone (**202**) **514-2757**

Company **US DOJ**

Address **DOJ No. 90-5-1-1-10972** Hold Weekday
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room REQUIRED, NOT available for FedEx First Overnight.

Address **601D Street NW** Hold Saturday
Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED, Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

City **Washington, DC** State **ZIP 20004**

0121191951

Deliveries when and where you want.
Learn about FedEx Delivery Manager® at fedex.com/delivery.

4 Express Package Service * To most locations.

Packages up to 150 lbs.
For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

- ☐ **Saturday Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery.
- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.
- Does this shipment contain dangerous goods?**
One box must be checked.
☒ **No** ☐ **Yes** As per attached Shipper's Declaration ☐ **Yes** Shipper's Declaration not required.
- ☐ **Dry Ice**
Dry Ice, 9, UN 1845 x kg
- ☐ **Cargo Aircraft Only**
- Restrictions apply for dangerous goods — see the current FedEx Service Guide.

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
- ☒ **Sender** Acct. No. in Section I will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
- FedEx Acct. No. Credit Card No. Exp. Date
- Total Packages **1** Total Weight lbs. Total Declared Value¹ \$.00

¹Our liability is limited to \$500 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 5/15 • Part #163134 • ©1994-2015 FedEx • PRINTED IN U.S.A. SRM

611

1 From Please print and press hard.

Date **5/31/2016** Sender's FedEx Account Number **1060-5969-1**

Sender's Name **Michael DiSantis/bab** Phone (**610**) **876-5523**

Company **DELCORA**

Address **100 E 5TH ST FL 2** Dept./Floor/Suite/Room

City **CHESTER** State **PA** ZIP **19013-4508**

2 Your Internal Billing Reference

First 24 characters will appear on invoice. **2 SSOs**

3 To Recipient's Name **Chief, NPDES Enforcement Branch (3WP42)** Phone (**215**) **814-2097**

Company **USEPA, REGION 3**

Address **1650 Arch Street** Hold Weekday
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room REQUIRED, NOT available for FedEx First Overnight.

Address **Philadelphia** Hold Saturday
Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED, Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

City **Philadelphia** State **PA** ZIP **19103-2029**

0121191951

Leave the packing to the pros at FedEx Office.
Go to fedex.com/office.

4 Express Package Service * To most locations.

Packages up to 150 lbs.
For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

- ☐ **FedEx First Overnight**
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☒ **FedEx Priority Overnight**
Next business morning. * Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Standard Overnight**
Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

- ☐ **FedEx 2Day A.M.**
Second business morning. * Saturday Delivery NOT available.
- ☐ **FedEx 2Day**
Second business afternoon. * Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
- ☐ **FedEx Express Saver**
Third business day. * Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

- ☒ **FedEx Envelope*** ☐ **FedEx Pak*** ☐ **FedEx Box** ☐ **FedEx Tube** ☐ **Other**

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

- ☐ **Saturday Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- ☐ **No Signature Required**
Package may be left without obtaining a signature for delivery.
- ☐ **Direct Signature**
Someone at recipient's address may sign for delivery.
- ☐ **Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.
- Does this shipment contain dangerous goods?**
One box must be checked.
☒ **No** ☐ **Yes** As per attached Shipper's Declaration ☐ **Yes** Shipper's Declaration not required.
- ☐ **Dry Ice**
Dry Ice, 9, UN 1845 x kg
- ☐ **Cargo Aircraft Only**
- Restrictions apply for dangerous goods — see the current FedEx Service Guide.

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
- ☒ **Sender** Acct. No. in Section I will be billed. ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash/Check**
- FedEx Acct. No. Credit Card No. Exp. Date
- Total Packages **1** Total Weight lbs. Total Declared Value¹ \$.00

¹Our liability is limited to \$500 unless you declare a higher value. See back for details. By using this airbill you agree to the service conditions on the back of this airbill and in the current FedEx Service Guide, including terms that limit our liability.

Rev. Date 5/15 • Part #163134 • ©1994-2015 FedEx • PRINTED IN U.S.A. SRM

611



www.delcora.org

Delaware County Regional Water Quality Control Authority

100 E. Fifth Street
P.O. Box 999
Chester, PA 19013