

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103**

In The Matter of:)	Docket No.: CWA-03-2010-0086 DN
)	PROCEEDING UNDER SECTION
)	309(a) of the Clean Water Act
Upper Allegheny Joint)	33 U.S.C. §1319(a)
Sanitary Authority,)	
)	
Harrison Township,)	
)	
Municipal Authority of)	
Buffalo Township,)	
)	
East Deer Township,)	
)	
Borough of Tarentum,)	
)	
Borough of Brackenridge,)	Administrative Order
)	for Compliance on Consent
and)	
)	
Fawn Township Sewer Authority)	
)	
Respondents)	
)	
)	
)	

I. STATUTORY AUTHORITY

1. This Administrative Order for Compliance on Consent (AOC) is issued under the authority vested in the United States Environmental Protection Agency (EPA) under Section

309(a) of the Clean Water Act (CWA or Act), 33 U.S.C. § 1319(a). The Administrator of the EPA has delegated this authority to the Regional Administrator of EPA Region III, who in turn has redelegated it to the Director of the Water Protection Division of EPA Region III. This AOC shall supersede the previous Administrative Order issued to the Upper Allegheny Joint Sanitary Authority, Harrison Township, Buffalo Township, East Deer Township, Borough of Tarentum, Borough of Brackenridge and Fawn Township on September 27, 2007 and the Administrative Order shall be of no effect.

II. FINDINGS

2. Respondents neither admit nor deny the following Findings.
3. Each of the Respondents: Upper Allegheny Joint Sanitary Authority, Harrison Township, Municipal Authority of Buffalo Township, East Deer Township, Borough of Tarentum, Borough of Brackenridge and Fawn Township Sewer Authority is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).
4. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant (other than dredged or fill material) by any person from a point source into waters of the United States except in compliance with a permit issued pursuant to the National Pollutant Discharge Elimination System ("NPDES") program under Section 402 of the Act, 33 U.S.C. § 1342, and 40 C.F.R. Part 122.
5. Section 502(6) of the Act, 33 U.S.C. § 1362(6), defines "pollutant" to include, inter alia, sewage, sewage sludge, biological material and industrial, municipal and agricultural waste.
6. Section 502(12) of the Act, 33 U.S.C. § 1362(12), defines "discharge of a pollutant" to include "any addition of any pollutant to navigable waters from any point source."
7. Section 502(14) of the Act, 33 U.S.C. § 1362(14) defines "point source" as "any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well [or] discrete fissure from which pollutants are or may be discharged."
8. A combined sewer system (CSS) is a wastewater collection system owned by a State or municipality (as defined by Section 502(4) of the CWA) which conveys sanitary wastewaters (domestic, commercial and industrial wastewaters) and storm water through a single-pipe system to a publicly owned treatment works (POTW) (as defined in 40 C.F.R. §403.3). A combined sewer overflow (CSO) is the discharge from a CSS at a point prior to the POTW treatment plant. CSOs are point sources subject to NPDES permit requirements including both technology-based and water quality-based requirements of the CWA.

9. Section 402(q)(1) of the Act, 33 U.S.C. § 1342(q)(1), provides that each NPDES permit, order, or decree issued under Section 402 after December 21, 2000, for a discharge from a municipal combined storm and sanitary sewer shall conform to EPA's Combined Sewer Overflow Control Policy, April 11, 1994, 59 F.R. 18688-18698 (CSO Policy).

10. The purpose of the CSO Policy is "to coordinate the planning, selection, design and implementation of CSO management practices and controls to meet the requirements of the CWA and to involve the public fully during the decision making process." 59 Fed. Reg. 18688, 18689 (April 19, 1994). Among the objectives of the CSO Policy is "[t]o bring all wet weather CSO discharge points into compliance with the technology-based and water quality-based requirements of the CWA." *Id.*

11. The CSO Policy requires: 1) implementation of the nine minimum technology-based controls (NMCs) set forth in the CSO Policy, no later than January 1, 1997; and 2) development and implementation of a long-term CSO control plan (LTCP) that will ultimately result in compliance with the requirements of the CWA, including applicable water quality standards. The LTCP must include a post-construction water quality monitoring program adequate to verify compliance with water quality standards and protection of designated uses as well as to ascertain the effectiveness of CSO controls.

12. Respondent Upper Allegheny Joint Sanitary Authority (Upper Allegheny) owns and operates a POTW, which includes a wastewater treatment plant (WWTP) located in East Deer Township, Allegheny County. The Upper Allegheny sewage collection system includes sewer pipes, force mains and one lift/pump station. The Upper Allegheny collection system collects sewage from Harrison Township, Municipal Authority of Buffalo Township, East Deer Township, Borough of Tarentum, Borough of Brackenridge and the Fawn Township Sewer Authority.

13. Respondents Harrison Township, East Deer Township, Borough of Tarentum, Borough of Brackenridge, Municipal Authority of Buffalo Township and Fawn Township Sewer Authority (collectively, Contributing Municipality Respondents) each own and operate a waste water collection system (WWCS), that conveys sanitary wastewater and industrial wastewater and storm water through a single-pipe system and/or only sanitary wastewater to the Upper Allegheny WWTP for treatment. The Contributing Municipalities together comprise a regional collection system that serves the Upper Allegheny area (Upper Allegheny Regional Collection System or UARCS). The UARCS collects and conveys both sanitary wastewater, including sewage, and storm water to the WWTP and is therefore a CSS. The UARCS includes force mains, sewer lines, pump stations, manholes, and other real and personal property and appurtenances thereto designed to convey sanitary wastewater (including sewage) and storm water to the WWTP or, in wet weather, to CSO discharge points.

14. Respondent Harrison Township owns and operates a sewage collection system. Sewage collected by Harrison Township's collection system is conveyed to the sewage collection system operated by Upper Allegheny and thereafter conveyed for treatment at the Upper Allegheny WWTP.

15. Respondent Municipal Authority of Buffalo Township owns and operates a sewage collection system. Sewage collected by the Municipal Authority of Buffalo Township collection system is conveyed to the sewage collection systems operated by Respondents Harrison Township, the Fawn Township Municipal Authority and Upper Allegheny and thereafter conveyed for treatment at the Upper Allegheny WWTP.

16. Respondent East Deer Township owns and operates a sewage collection system. Sewage collected by the East Deer Township collection system is conveyed to the sewage collection system operated by Upper Allegheny and thereafter conveyed for treatment at the Upper Allegheny WWTP.

17. Respondent Borough of Tarentum owns and operates a sewage collection system. Sewage collected by the Borough of Tarentum collection system is conveyed to the sewage collection system operated by Upper Allegheny and thereafter conveyed for treatment at the Upper Allegheny WWTP.

18. Respondent Borough of Brackenridge owns and operates a sewage collection system. Sewage collected by the Borough of Brackenridge collection system is conveyed to the sewage collection system operated by Upper Allegheny and thereafter conveyed for treatment at the Upper Allegheny WWTP.

19. Respondent Fawn Township Sewer Authority owns and operates a sewage collection system. Sewage collected by the Fawn Township Sewer Authority collection system is conveyed to the sewage collection system operated by Upper Allegheny and thereafter conveyed for treatment at the Upper Allegheny WWTP.

20. Each of the Respondents, except for Respondent Municipal Authority of Buffalo Township, and the Upper Allegheny WWTP is located in Allegheny County, Pennsylvania. The Municipal Authority of Buffalo Township is located in Butler County, Pennsylvania.

21. On June 20, 2002, pursuant to Section 402 of the Act, 33 U.S.C. § 1342, the Pennsylvania Department of Environmental Protection (PADEP) reissued NPDES Permit No. PA0027391 (Permit) to Respondent Upper Allegheny, for the discharge of pollutants from the UARCS to the Allegheny River. The Permit authorizes, *inter alia*, the discharge of pollutants through 17 specified CSO discharge points subject to the terms and conditions of the Permit. The permit term was from June 20, 2002 through June 20, 2007. The Permit continues in effect pursuant to 40 C.F.R. § 122.6(d) and 25 Pa. Code § 92.9.

22. Respondents Harrison Township, Borough of Tarentum, Borough of Brackenridge and Upper Allegheny each have CSSs which experience periodic discharges of untreated sewage and storm water from overflow points (CSOs) under their ownership and located within their jurisdictional borders and the UARCS.

23. Each Contributing Municipality Respondent routes wastewater through its collection system (either combined or separate) to the Upper Allegheny WWTP for treatment and discharge under the Permit and therefore each Respondent contributes “pollutants” to a “discharge” from a “point source” as those terms are defined under Section 502 of the CWA, 33 U.S.C. § 1362.

24. Consistent with the CSO Policy, Part C, Subparagraph 7(A) of the Permit requires continued implementation of the NMCs, including documentation of such implementation. Part C. Subparagraphs 7. B. and C. require implementation of the LTCP and monitoring and reporting related to CSOs. Part C. Subparagraph 7. D. of the Permit requires Respondent Upper Allegheny, where applicable, to co-operate with and participate in any interconnected CSO system’s NMCs and LTCP activities being developed and/or carried out by the operator(s) of these systems, and to participate in implementing applicable portions of the approved NMC and LTCP in such systems.

25. The CSO Policy contemplates that all municipalities, such as the Contributing Municipality Respondents, tributary to a CSS operated by a different authority will cooperate with the development and implementation of an LTCP.

26. Upper Allegheny submitted to PADEP an LTCP dated September 2, 2003.

27. On August 21, 2007 EPA, PADEP and the Allegheny County Health Department (ACHD) met with representatives of Upper Allegheny, East Deer Township, Tarentum Borough and Brackenridge Borough to discuss the status of implementation of the NMCs and development of the LTCP, reviewed documents and inspected several of the CSO outfalls.

28. By letter dated September 5, 2007 PADEP advised Respondent Upper Allegheny that the LTCP does not incorporate all of the elements of an LTCP required by the CSO Policy and therefore could not be approved. In addition, PADEP noted that, based upon the August 21 inspection, Respondent Upper Allegheny has failed to continue NMC implementation and to provide documentation of continued implementation of the NMCs. Upper Allegheny avers that it has submitted various reports, including its annual “Chapter 94 Report”, submitted pursuant to 25 Pa. Code Chapter 94, documenting the steps Upper Allegheny has taken to implement the NMCs.

29. PADEP has been unable to approve Upper Allegheny’s LTCP due to the deficiencies referenced in paragraph 28, above, which have not been corrected.

30. The Contributing Municipality Respondents have agreed to fully characterize their WWCSs as provided herein and to provide other information to Upper Allegheny necessary to the development of an approvable LTCP to control CSOs within the UARCS.

IV. ORDER FOR COMPLIANCE

Therefore, this _____ day of _____, 2010, EPA ORDERS and Respondents consent to conduct the following activities:

WORK TO BE PERFORMED

31. As set forth below and in accordance with the provisions of Appendices A through F which are attached hereto and incorporated into this AOC by reference, Respondent Upper Allegheny and each of the Contributing Municipality Respondents shall prepare and provide the following to EPA, PADEP and ACHD in accordance with the schedule set forth below:

a) Public Participation Plan (PPP): In accordance with the requirements set forth in Appendix A, within three months of the effective date of this AOC, develop a “Public Participation Plan” to ensure that the public served by UARCS is actively involved in the development of the LTCP;

b) Sewer System Investigation - In accordance with the requirements set forth in Appendix B hereto, (i) within one year of the effective date of this AOC, conduct and complete a physical survey/visual inspection of all sewers; and (ii) within three years of the effective date of this AOC, conduct and complete sewer line cleaning and closed circuit television (CCTV) internal inspection of pipelines in a separate sanitary system of diameter 10 inches or greater and of pipelines in a combined sewer system of diameter 18 inches or greater, and undertake sewer system deficiency corrections;

c) Sewer System Mapping - In accordance with the requirements of Appendix C hereto within two years of the effective date of this AOC, develop comprehensive sewer system maps;

d) Flow and Rainfall Monitoring - In accordance with the requirements of Appendix D hereto, within three months of completing the CCTV internal inspection set forth in Paragraph 31(b) above, submit a plan to conduct flow and rainfall monitoring; and upon completion of flow and rainfall monitoring in accordance with the requirements of Appendix D, submit a report of the results of such flow and rainfall monitoring;

e) Combined Sewer Overflow Pollutant Monitoring - In accordance with the requirements of Appendix E hereto, within three months of completion of the sewer system investigation, CCTV inspection, and mapping required by paragraphs 31(b) and (c), above develop and implement a combined sewer overflow pollutant monitoring plan; and

f) Hydrologic and Hydraulic Model - In accordance with the requirements of Appendix F hereto, within six months of completion of the sewer system investigation, CCTV inspection and mapping required by paragraphs 31(b) and (c) above, develop and implement a hydrologic and hydraulic model to simulate the hydrologies and hydraulics of flows in the UARCS.

32. Within twenty-four months of completion of the flow and rainfall monitoring required by paragraph 31(e), Respondent Upper Allegheny shall submit a final LTCP to EPA, PADEP and ACHD. The LTCP shall conform to the CSO Policy and be based upon the EPA guidance document titled "Combined Sewer Overflows, Guidance for Long-Term Control Plan," (EPA 832-B-95-002) and any other applicable or relevant EPA and PADEP guidance documents. The LTCP shall select one or more CSO controls designed to achieve applicable water quality standards, and set forth an implementation plan and schedule for the selected CSO controls. In addition, the LTCP, at a minimum, shall:

a. Require continued implementation of the nine minimum controls (NMCs) by all Respondents;

b. Identify all sensitive areas impacted by Respondents' CSO discharges from the UARCS, describe the impacts to such areas from the CSO discharges, and describe how the LTCP will control CSO discharges to eliminate or minimize impacts of CSOs on sensitive areas. For the purposes of this AOC, sensitive areas shall include: designated Outstanding National Resource Waters; National Marine Sanctuaries; waters with threatened or endangered species and their habitat; waters with primary contact recreation; public drinking water intakes located within one mile of a CSO; and shellfish beds;

c. Include public participation in the development of the LTCP. Specifically, the LTCP shall describe how Respondents have ensured that citizens who use receiving waters and/or are served by the UARCS had the opportunity to participate in the development of the LTCP. This description shall include, but not be limited to, the dates of public meetings and methods of public notification; and

d. Propose a post-NMC/LTCP implementation monitoring program sufficient to determine whether water quality standards are being attained and designated uses are being achieved. The post-construction compliance monitoring program shall include, but not be limited to, the following components:

- (i) monitoring the volume of flow received at the WWTP;
- (ii) monitoring the flow volume and duration of the remaining CSO discharges to characterize pollutant loads to receiving waters;
- (iii) monitoring receiving waters to characterize the impacts of remaining CSO discharges;
- (iv) monitoring the ecological health of the receiving waters;
- (v) monitoring the recreational use of the receiving waters when those waters are impacted by CSO discharges from the UARCS; and
- (vi) performing other measurements for the purpose of identifying trends in conditions relating to the use of receiving waters and the effects of CSO discharges on the health of the population using receiving waters and that of the organisms that reside in the water body.

e. Include the results of Respondents' characterization of the UARCS, including a CSO System Inventory and Characterization Report and CSO System Hydraulic Characterization. The results should include characterization of pollutant loads discharged to receiving waters from CSOs and the impacts of such pollutant loads on receiving water quality.

f. Include an alternatives analysis that identifies and compares all control technologies for controlling CSO discharges that were evaluated. Include the selected control technology(ies) and provide justification for selection of that technology.

g. To the extent that Respondent Upper Allegheny selects the "Presumption Approach" described in the CSO Control Policy, the LTCP shall provide sufficient information for PADEP and EPA to evaluate and determine "whether such presumption is reasonable in light of the data and analysis conducted in the characterization, monitoring, and modeling of the system and the consideration of sensitive areas," (CSO Control Policy, 59 Fed. Reg. at 18692), including but not limited to:

- (i) the method by which Respondents calculate 85% capture and treatment (i.e. 100% of sanitary flow was captured and 85% of the combined flow was captured and treated based upon flow monitoring, etc.);
- (ii) end-of-pipe measurements used to identify trends in the frequency of and/or pollutant loadings to receiving waters from UARCS

CSO discharges;

- (iii) in-stream measurements to identify trends in the water quality impacted by UARCS-CSO discharges;
- (iv) other measurements indicating trends in conditions relating to the use of receiving waters and the effects of CSO discharges on the health of the population using receiving waters and that of the organisms that reside in the water body; and
- (v) a description of how the data described in this paragraph and other information, as appropriate, were used for the UARCS characterization.

33. In the event that EPA determines that modifications, amendments, corrections, or additions are necessary to any of the documents required to be submitted by the Respondents, the Respondents shall submit such revisions within a maximum of forty-five (45) days after receipt of written notice describing said deficiencies.

34. Within 30 days of the effective date of this Order Respondent Upper Allegheny shall submit a NMC Implementation Documentation Report reflecting detailed documentation of the NMC implementation efforts for the POTW, and to the extent known, the UARCS. Such report shall conform to EPA guidance document "Combined Sewer Overflows, Guidance for Nine Minimum Controls", EPA 832-B-95-003.

35. Within 120 days of the effective date Respondent Upper Allegheny and Respondent Brackenridge shall conduct dye testing at the storm sewer outfall adjacent to CSO number 015 (located at Mile Lock Lane and River Road) and upstream of that outfall in order to obtain information to determine if any sanitary wastes are discharging from the sewer outfall and provide a report that locates, identifies and describes all non-storm water sewer lines, flows and connections. The report shall include a plan and schedule for removal of all non-storm water connections. If Respondents have detailed information that demonstrates sanitary wastes are not discharging from the sewer outfall, Respondents may submit this information in lieu of the required dye testing and report.

V. GENERAL PROVISIONS

36. This AOC is not intended to preclude any of the Respondents from agreeing among themselves, as a matter of efficiency, that one or more of Respondents may take the lead in producing any of the reports, plans, maps or other submissions required by this AOC. In addition, this AOC is not intended to preclude any of the Respondents from agreeing among

themselves, as a matter of efficiency, to jointly produce any of the reports, plans, maps or other submissions this AOC requires them to individually produce. Such agreement(s) however, does not waive the individual Respondent's responsibility to meet the requirements of this AOC and the CWA.

37. Unless otherwise specified, all reports, notices or any other written communications required to be submitted under the AOC shall be submitted to EPA as follows:

Andrew F. Seligman
Senior Environmental Scientist/Enforcement Officer
NPDES Enforcement Branch (3WP42)
United States Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

A copy of all submissions required by this Order shall also be sent to PADEP:

Paul Eiswerth
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222-4745

and to ACHD:

Geoffrey Butia, Chief
Public Drinking Water and Waste Management
Allegheny County Health Department
Frank B. Clack Health Center
3901 Penn Avenue, Building #5
Pittsburgh, PA 15224-1318

38. All correspondence with the Respondents shall be addressed to the following, and all correspondence shall be copied to all Respondents as well as to EPA, PADEP and ACHD.

Manager
East Deer Township
927 Freeport Road
Creighton, PA 15030

Manager
Brackenridge Borough
1000 Brackenridge Avenue
Brackenridge, PA 15014

Manager
Fawn Township Sewer Authority
277 Main Street
P.O. Box 654
Saxonburg, PA 16056

Manager
Municipal Authority of Buffalo Township
277 Main Street
P.O. Box 654
Saxonburg, PA 16056

Manager
Borough of Tarentum
318 Second Avenue
Tarentum, PA 15084

Manager
Upper Allegheny Joint Sewer Authority
P.O. Box 431
Tarentum, PA 15084

Manager
Harrison Township
Municipal Drive
P.O. Box 376
Natrona Heights, PA 15065

39. All documents, reports or other submissions by a Respondent pursuant to this AOC shall be signed by a ranking elected official of the Respondent, or a person who has been duly authorized as a representative of such elected official in accordance with 40 C.F.R. Section 122.22(b) and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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."

40. Issuance of this Order shall not be deemed an election by EPA to forego any administrative, civil, or criminal action to seek penalties, fines, or any other appropriate relief under the Act for the violations cited herein. EPA reserves the right to seek any remedy available under the law that it deems appropriate for the violations cited and the Respondents reserve their rights to object to or defend against any future such action by EPA.

41. A Respondent's compliance with the terms of this Order shall not constitute compliance with the Clean Water Act or any other Federal, State or local law or regulation. Nor does this Order constitute a waiver or modification of the terms or conditions of any issued permit.

42. Violation of the terms of this Order may result in further EPA enforcement action for violation of the Order and for the underlying CWA violations including, but not limited to, imposition of administrative penalties, 33 U.S.C. § 1319(g), and/or initiation of judicial proceedings that allow for civil penalties of up to \$32,500 per day, 33 U.S.C. § 1319(b) and (d), for each day of violation, 40 C.F.R. Part 19, and/or for the criminal sanctions of imprisonment and fines of up to \$50,000 per day, 33 U.S.C. § 1319(c). Such penalties may be increased pursuant to 40 C.F.R. Part.19.

43. Each of the undersigned representatives of Respondents certifies that he or she is fully authorized by the party represented to enter into the terms and conditions of this AOC and to execute and legally bind that party to it.

44. Respondents agree to perform all requirements of this AOC within the time limits established under this AOC unless the performance is delayed by a *force majeure* event. For purposes of this AOC, a *force majeure* event shall mean any event arising from causes beyond the control of Respondents or any entity controlled by Respondents, including but not limited to

their contractors and subcontractors, which delays or prevents performance of any obligation under this AOC despite Respondents' best efforts to fulfill the obligation. *Force majeure* does not include the financial inability to complete the work or increased cost of performance.

If any event occurs or has occurred that may delay the performance of any obligation under this AOC, whether or not caused by a *force majeure* event, Respondents shall notify EPA orally within five days of when Respondents first knew that the event might cause a delay. Within seven days thereafter, Respondents shall provide to EPA in writing an explanation and description of the reasons for the delay; the anticipated duration of the delay; all actions taken or to be taken to minimize the delay; a schedule of implementation of any measures to be taken to prevent or mitigate the delay or effect of the delay; Respondents' rationale for attributing such delay to a *force majeure* event if they intend to assert such a claim; and a statement as to whether such event may cause or contribute to an endangerment to public health, welfare or the environment. Failure to comply with the above requirements shall preclude Respondents from asserting any claim of *force majeure* for that event for the period of time of such failure to comply and for any additional delay caused by such failure.

If EPA agrees that the delay or anticipated delay is attributable to a *force majeure* event, the time for performance of the obligations under this AOC that are affected by the *force majeure* event will be extended by EPA for such time as is necessary to complete those obligations. An extension of time for performance of the obligations affected by the *force majeure* event shall not, of itself, extend the time for performance of any other obligation. If EPA does not agree that the delay or anticipated delay has been or will be caused by a *force majeure* event, EPA will notify Respondents in writing of its decision. If EPA agrees that the delay is attributable to a *force majeure* event, EPA will notify Respondents in writing of the length of the extension, if any, for performance of the obligations affected by the *force majeure* event.

45. No changes additions, modifications, or amendments of the AOC shall be effective unless they are set out in writing and signed by the parties hereto affected by the change, modification or amendment.

46. This AOC shall terminate as to each Contributing Municipality Respondent when each such Respondent completes its obligations under paragraph 33 above, and shall terminate as to Respondent Upper Allegheny when it completes its additional obligations under paragraph 33 and submits an acceptable LTCP under paragraph 34 above.

VI. EFFECTIVE DATE

47. The effective date of this Order as to each Respondent shall be the date it is signed by EPA.

For the United States Environmental Protection Agency:

Date: _____ /S/ _____
Jon M. Capacasa, Director
Water Protection Division
USEPA Region III

Date: _____ /S/ _____
Upper Allegheny Joint Sanitary Authority

Date: _____ /S/ _____
Harrison Township

Date: _____ /S/ _____
Municipal Authority of
Buffalo Township

Date: _____ /S/ _____
East Deer Township

Date: _____ /S/ _____
Borough of Tarentum

Date: _____ /S/ _____
Borough of Brackenridge

Date: _____ /S/ _____
Fawn Township Sewer Authority

