



**U.S. EPA REGION 3
HEARING CLERK**

- FACILITY.

permit issued under section [402] ... of the Act, ... [EPA] shall issue an order requiring such person to comply with such condition or limitation” See 33 U.S.C. § 1319(a)(3).

3. The EPA has jurisdiction over the above-captioned matter, as described in Paragraphs 1 and 2, above.
4. The EPA has consulted with the Pennsylvania Department of the Environmental Protection (“PADEP”) regarding this action and, subsequent to the Effective Date, the EPA will provide a copy of this fully executed AOC to the appropriate PADEP representative.

II. GENERAL PROVISIONS

5. For purposes of this proceeding, Respondent admits the jurisdictional allegations set forth in this AOC.
6. Except as provided in Paragraph 5, above, Respondent neither admits nor denies the specific factual allegations set forth in this AOC.
7. Respondent agrees not to contest the jurisdiction of the EPA with respect to the execution or enforcement of this AOC.
8. The provisions of this AOC shall apply to and be binding upon the Respondent and its officers, directors, employees, contractors, agents, trustees, successors and assigns of the Respondent.
9. Respondent shall bear its own costs and attorneys’ fees in connection with this proceeding and associated with the implementation or enforcement of this AOC, including any costs related to resolution of any dispute arising regarding this AOC.
10. Issuance of this AOC is intended to address the violations described herein. The EPA reserves the right to commence action against any person, including Respondent, in response to any condition which the EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. The EPA also reserves any existing rights and remedies available to it under the CWA, 33 U.S.C. § 1251 – 1389, the regulations promulgated thereunder, and any other federal laws or regulations for which the EPA has jurisdiction. Further, the EPA reserves any rights and remedies available to it under the CWA, the regulations promulgated thereunder, and any other federal laws or regulations for which the EPA has jurisdiction, to enforce the provisions of this AOC, following the Effective Date, as defined below.
11. This AOC does not constitute a waiver or modification of the terms or conditions of any permit issued to Respondent. Nothing in this Order shall relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local laws and

regulations, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state, or local permit. This Order does not constitute a waiver, suspension, or modification of the requirements of the Act, 33 U.S.C. §§ 1251 – 1389, or any regulations promulgated thereunder.

12. Respondent waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this AOC, including any right of judicial review pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701 – 706.
13. The EPA reserves all existing inspection authority otherwise available to the EPA pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, or pursuant to any other statute or law.
14. The undersigned representative of Respondent certifies that he or she is fully authorized by the Respondent to enter into the terms and conditions of this AOC and to execute and legally bind the Respondent.
15. By signing this AOC, Respondent acknowledges that this AOC may be available to the public and represents that, to the best of Respondent's knowledge and belief, this AOC does not contain any confidential business information or personally identifiable information from Respondent.
16. Respondent certifies that any information or representation it has supplied or made to the EPA concerning this matter was, at the time of submission, true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. The EPA shall have the right to institute further actions to recover appropriate relief if the EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this AOC are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that the EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

III. STATUTORY AND REGULATORY BACKGROUND

17. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant (other than dredged or fill material) 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.

18. “Discharge of a pollutant” means “[a]ny addition of any ‘pollutant’ or combination of pollutants to ‘waters of the United States’ from any ‘point source.’” 40 C.F.R. § 122.2.
19. “Pollutant” is defined as “dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water.” 40 C.F.R. § 122.2. *See also* 33 U.S.C. § 1362(6).
20. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of the EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to waters of the United States, to ensure compliance with the requirements of the CWA. The discharges are subject to specific terms and conditions, as prescribed in the permit. *See also* 33 U.S.C. § 1311.
21. Pursuant to Section 402(b) of the Act, 33 U.S.C. § 1342(b), the EPA authorized PADEP to administer the NPDES program in the State of Pennsylvania.
22. Pursuant to Section 402(i) of the CWA, 33 U.S.C. § 1342(i), the EPA retains its authority to take enforcement action within Pennsylvania for NPDES permit violations.

IV. FINDINGS OF FACT AND JURISDICTIONAL ALLEGATIONS

23. As a municipal authority, Respondent is a “person” within the meaning of Section 502(4) and (5) of the Act, 33 U.S.C. § 1362(4) and (5).
24. At all times relevant to this AOC, Respondent owned and operated the Girardville Area Municipal Authority Wastewater Treatment Plant (“WWTP” or “Facility”) located at 99 Julia Street, Girardville, Pennsylvania 17935. This is a municipal publicly-owned sewage treatment works (“POTW”) that receives and treats domestic sewage from Girardville Borough, Pennsylvania.
25. The operation of the WWTP is subject to Pennsylvania NPDES Permit No. PA0063312 (“Permit”), which was issued by PADEP and became effective on 5/1/2025. The previous version of the Permit became effective on 09/01/2016 and was administratively extended until the new Permit became effective on 5/1/2025. Respondent has maintained coverage under either the current Permit or previous version of the Permit at all times relevant to this AOC.
26. Respondent is authorized to discharge pollutants, in the form of wastewater from the WWTP, to waters of the United States only in accordance with the terms and conditions of the Permit.

27. At all times relevant to this AOC, the WWTP discharged wastewater into Mahanoy Creek, through a “point source,” as that term is defined at Section 502(14) of the Act, 33 U.S.C. § 1362(14).
28. Mahanoy Creek is a permanent tributary of the Susquehanna River, which is a Traditional Navigable Water, and a water of the United States within the meaning of Section 502(7) of the Act, 33 U.S.C. § 1362(7).
29. On June 28, 2023, EPA inspectors inspected the WWTP for purposes of determining compliance with the Permit (the “Inspection”).
30. On February 18, 2025, the EPA issued a Notice to Show Cause Letter alleging violations of NPDES Permit No. PA0063312 and the CWA, based on inspector observations from the Inspection.
31. On April 8, 2025, Respondent and EPA met to discuss Respondent’s compliance with the Permit.
32. During the April 8, 2025, meeting and in subsequent correspondence, Respondent claimed that the root cause of many of the Permit violations identified by EPA have been addressed by recent upgrades to the Facility’s systems of treatment and control. The Facility upgrades occurred from November 2022 through November 2023 and were actively occurring during EPA’s Inspection.
33. Respondent claims that effluent exceedances occurring after the completion of Facility upgrades in December 2023 are likely due to water inflow and infiltration (“I&I”) into the facility from extreme wet weather events.
34. On April 28, 2025, EPA requested that Respondent submit a Corrective Action Plan to address ongoing effluent exceedances at the Facility since completion of the Facility upgrades in December 2023. Respondent agreed to submit a plan to reduce the inflow and infiltration at the Facility (“I&I CAP”) that it believes are causing ongoing effluent exceedances.
35. On May 28, 2025, Respondent submitted the I&I CAP, which has been included as Attachment 1 to this AOC. Items 1. through 5. of the I&I CAP have been completed prior to the Effective Date of this AOC.

Count 1

Failure to Properly Operate and Maintain All Facilities and Systems of Treatment and Control

36. The allegations in the preceding paragraphs are incorporated by reference.
37. Part B Section I.E.2 of the Permit requires Respondent to properly operate and maintain all facilities and systems of treatment and control.

38. During the 2023 Inspection, EPA inspectors observed the following which EPA believes show Respondent was not operating and maintaining all facilities and systems of treatment and control:
- The scum trough of the second aeration/clarification tank was overtopped and overflowing into the tank;
 - Sodium bisulfite containers in the chemical storage building were not in secondary containment and were stored adjacent to a floor drain; and
 - Two of the four wastewater treatment plant sludge reed beds were offline due to a damaged and leaking conveyance line.
39. In failing to properly operate and maintain all facilities and systems of treatment and control at the Facility, as required by Part B Section I.E.1 of the Permit, Respondent violated the Permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, and the CWA.

Count 2

Effluent Exceedances from Outfall 001 to Mahanoy Creek

40. The allegations in the preceding paragraphs are incorporated by reference.
41. Part A of the Permit defines effluent limitations and monitoring requirements for Outfall 001 discharges from the Facility into Mahanoy Creek.
42. Additionally, the Facility had numerous effluent exceedances from May 2018 to June 2025, summarized in Table 1 below:

Table 1: Facility Effluent Exceedances from May 2018 – June 2025

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
05/31/2018	001	Solids, total suspended	WKLY AVG	212.5 lb/d	<=127.6 lb/d	67%
07/31/2018	001	Coliform, fecal general	INST MAX	1,800 cfu/100ml	<=1,000 cfu/100ml	80%
01/31/2019	001	pH	MINIMUM	5.8 su	>=6 su	
02/28/2019	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	42.5 mg/l	<=40 mg/l	6%

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
03/31/2019	001	Chlorine, total residual	MO AVG	1.2 mg/l	<=1 mg/l	20%
07/31/2019	001	Solids, total suspended	WKLY AVG	74 mg/l	<=45 mg/l	64%
06/30/2020	001	Coliform, fecal general	INST MAX	3,400 cfu/100ml	<=1,000 cfu/100ml	240%
07/31/2020	001	Oxygen, dissolved [DO]	MINIMUM	.8 mg/l	>=4 mg/l	80%
07/31/2020	001	Coliform, fecal general	INST MAX	4,000 cfu/100ml	<=1,000 cfu/100ml	300%
08/31/2020	001	pH	MINIMUM	5.9 su	>=6 su	
10/31/2020	001	Solids, total suspended	WKLY AVG	57.5 mg/l	<=45 mg/l	28%
11/30/2020	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
12/31/2020	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
01/31/2021	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
01/31/2021	001	Coliform, fecal general	INST MAX	12,200 cfu/100ml	<=10,000 cfu/100ml	22%
05/31/2021	001	Oxygen, dissolved [DO]	MINIMUM	2.24 mg/l	>=4 mg/l	44%
05/31/2021	001	Solids, total suspended	MO AVG	41 mg/l	<=30 mg/l	37%
05/31/2021	001	Coliform, fecal general	INST MAX	56,000 cfu/100ml	<=1,000 cfu/100ml	5,500%
06/30/2021	001	Oxygen, dissolved [DO]	MINIMUM	3.8 mg/l	>=4 mg/l	5%
07/31/2021	001	Solids, total suspended	WKLY AVG	53 mg/l	<=45 mg/l	18%
08/31/2021	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
09/30/2021	001	Oxygen, dissolved [DO]	MINIMUM	2.5 mg/l	>=4 mg/l	38%

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
09/30/2021	001	Solids, total suspended	MO AVG	<1,467.4 lb/d	<=85 lb/d	1,626%
09/30/2021	001	Solids, total suspended	WKLY AVG	3,801.2 lb/d	<=127.6 lb/d	2,879%
09/30/2021	001	Solids, total suspended	MO AVG	<179.6 mg/l	<=30 mg/l	499%
09/30/2021	001	Solids, total suspended	WKLY AVG	396.7 mg/l	<=45 mg/l	782%
09/30/2021	001	Coliform, fecal general	GEO MEAN	1,363 cfu/100ml	<=200 cfu/100ml	582%
09/30/2021	001	Coliform, fecal general	INST MAX	96,400 cfu/100ml	<=1,000 cfu/100ml	9,540%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	<7,706.6 lb/d	<=70.8 lb/d	10,785%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	658 lb/d	<=113.4 lb/d	480%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	<35 mg/l	<=25 mg/l	40%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	72.5 mg/l	<=40 mg/l	81%
10/31/2021	001	Solids, total suspended	WKLY AVG	89 mg/l	<=45 mg/l	98%
11/30/2021	001	Solids, total suspended	MO AVG	123 lb/d	<=85 lb/d	45%
11/30/2021	001	Solids, total suspended	WKLY AVG	300.1 lb/d	<=127.6 lb/d	135%
11/30/2021	001	Solids, total suspended	MO AVG	77.2 mg/l	<=30 mg/l	157%
11/30/2021	001	Solids, total suspended	WKLY AVG	182 mg/l	<=45 mg/l	304%
01/31/2022	001	Solids, total suspended	WKLY AVG	137.4 lb/d	<=127.6 lb/d	8%

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
01/31/2022	001	Solids, total suspended	MO AVG	51.3 mg/l	<=30 mg/l	71%
01/31/2022	001	Solids, total suspended	WKLY AVG	158 mg/l	<=45 mg/l	251%
01/31/2022	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
01/31/2022	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	54 mg/l	<=40 mg/l	35%
02/28/2022	001	Solids, total suspended	MO AVG	31.6 mg/l	<=30 mg/l	5%
02/28/2022	001	Solids, total suspended	WKLY AVG	59.5 mg/l	<=45 mg/l	32%
05/31/2022	001	Oxygen, dissolved [DO]	MINIMUM	3.93 mg/l	>=4 mg/l	2%
09/30/2022	001	Solids, total suspended	WKLY AVG	478.8 lb/d	<=127.6 lb/d	275%
09/30/2022	001	Solids, total suspended	MO AVG	62.3 mg/l	<=30 mg/l	108%
09/30/2022	001	Solids, total suspended	WKLY AVG	345 mg/l	<=45 mg/l	667%
09/30/2022	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	195.7 lb/d	<=113.4 lb/d	73%
09/30/2022	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	<37.4 mg/l	<=25 mg/l	50%
09/30/2022	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	141 mg/l	<=40 mg/l	253%
10/31/2022	001	Solids, total suspended	WKLY AVG	56 mg/l	<=45 mg/l	24%
12/31/2022	001	Coliform, fecal general	INST MAX	>20,000 cfu/100ml	<=10,000 cfu/100ml	99,999%
04/30/2023	001	Oxygen, dissolved [DO]	MINIMUM	2.5 mg/l	>=4 mg/l	38%

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
05/31/2023	001	Coliform, fecal general	INST MAX	20,000 cfu/100ml	<=1,000 cfu/100ml	1,900%
06/30/2023	001	Coliform, fecal general	INST MAX	6,300 cfu/100ml	<=1,000 cfu/100ml	530%
07/31/2023	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	47.7 mg/l	<=40 mg/l	19%
08/31/2023	001	Coliform, fecal general	INST MAX	2,700 cfu/100ml	<=1,000 cfu/100ml	170%
08/31/2023	001	Coliform, fecal general	INST MAX	354 cfu/100ml	<=200 cfu/100ml	77%
11/30/2023	001	Solids, total suspended	WKLY AVG	90 mg/l	<=45 mg/l	100%
12/31/2023	001	Coliform, fecal general	INST MAX	10,300 cfu/100ml	<=10,000 cfu/100ml	3%
1/31/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	163.7 lb/d	113.4 lb/d	44%
1/31/2024	001	Coliform, fecal general	INST MAX	>20,000 cfu/100ml	<=10,000 cfu/100ml	100%
1/31/2024	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
2/29/2024	001	Coliform, fecal general	INST MAX	19,100 cfu/100ml	<=10,000 cfu/100ml	91%
4/30/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	53.9 mg/l	<=40 mg/l	35%
4/30/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	303.0 lb/d	<=113.4 lb/d	168%
4/30/2024	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	82.4 lb/d	<=70.8 lb/d	16%
4/30/2024	001	Coliform, fecal general	INST MAX	20,000 cfu/100ml	<=10,000 cfu/100ml	100%

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
4/30/2024	001	Solids, total suspended	WKLY AVG	213.7 lb/d	<=127.6 lb/d	67%
4/30/2024	001	Solids, total suspended	MO AVG	99.8 lb/d	<=85 lb/d	17%
7/31/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	96.4 mg/l	<=40 mg/l	141%
7/31/2024	001	Solids, total suspended	WKLY AVG	533 mg/l	<=45 mg/l	1,084%
7/31/2024	001	Solids, total suspended	MO AVG	<109.2 mg/l	<=30 mg/l	264%
7/31/2024	001	Solids, total suspended	WKLY AVG	506.8 lb/d	<=127.6 lb/d	297%
7/31/2024	001	Solids, total suspended	MO AVG	<103.2 lb/d	<=85 lb/d	21%
12/31/2024	001	Coliform, fecal general	INST MAX	20,000 cfu/100ml	<=10,000 cfu/100ml	100%
5/31/2025	001	Coliform, fecal general	INST MAX	20,000 cfu/100ml	<=10,000 cfu/100ml	100%
5/31/2025	001	Solids, total suspended	WKLY AVG	46.5 mg/l	<=45 mg/l	3%
5/31/2025	001	Oxygen, dissolved [DO]	INST MIN	3.8 mg/l	>=4 mg/l	5%

43. In failing to meet the Permit effluent limitations detailed in paragraph 42, as required by Part A of the Permit, Respondent violated the Permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, and the CWA.

V. COMPLIANCE ORDER

Respondent is hereby ORDERED, pursuant to Section 309(a) of the CWA, 33 U.S.C. § 1319(a), to conduct, and consents to conduct, the following activities:

44. Respondent shall take any and all steps necessary to comply fully with the Permit as soon as practicable. Such steps include the activities outlined in this section.

45. Inflow and Infiltration. Starting on the Effective Date of the AOC, Respondent shall perform the Corrective Actions identified in Section 6.0 of the I&I Corrective Action Plan consistent with the schedule provided in Section 7.0 of the I&I Corrective Action Plan.
46. Quarterly Reporting. On or before March 31, 2026, and continuing at least quarterly thereafter (by March 31, June 30, September 30, and December 31 of each year), Respondent shall submit a report to EPA which provides a status update on Respondent's implementation of the twelve corrective action items listed in Section 7.0 of the I&I CAP. The status update provided for each of the twelve items shall contain sufficient information for the EPA to determine whether an item has been completed, or will be completed, by its target date. Where an action is not completed by its target date, Respondent shall include in its status update for that item an explanation for why the item was not completed by its target date and will describe measures that Respondent is taking to complete that item as soon as practicable after the target date, along with the item's estimated completion date. The last quarterly report shall be submitted after the final item in the I&I CAP has been completed.

VI. PROCEDURES FOR SUBMISSIONS

47. All documents required to be submitted by this Order and any Request for Termination shall be accompanied by a certification signed by a responsible officer, as defined in 40 CFR 122.22(d), that reads as follows:

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.

Signed _____

Title: _____

Date: _____

48. Respondent may assert a business confidentiality claim covering part of all of the information which this AOC requires it to submit to the EPA, but only to the extent and only in the manner described in Part 2 Subpart B of Title 40 of the C.F.R. The EPA will disclose information submitted under a confidentiality claim only as provided in Part 2 Subpart B of Title 40 of the C.F.R. If, at the time any information is submitted to the EPA, Respondent does not assert a confidentiality claim, the EPA may make the submitted information available to the public without further notice to Respondent.

49. Unless otherwise directed in writing, Respondent shall submit any submission or written communication, including any accompanying data, relating to this AOC via email to:

Email: Brian.Tolton@EPA.gov

Mr. Brian Tolton

NPDES Enforcement Officer

Enforcement and Compliance Assurance Division

U.S. EPA, Region 3

Any information submitted electronically shall be submitted in a widely recognized electronic format.

VII. CERTIFICATION OF COMPLIANCE AND REQUEST FOR TERMINATION OF AOC

50. Upon completion of all items listed in Section 7.0 of the I&I Corrective Action Plan, Respondent shall submit to the EPA a Certification of Compliance and Request for Termination of this AOC. Such certification and request shall include:
- a. a certification that Respondent has maintained compliance with this AOC for the term of this AOC; and
 - b. all necessary documentation, including photo documentation as appropriate, to support a finding that Respondent has complied with Section V (Compliance Order) of this AOC.
51. If, following review of any Certification of Compliance and Request for Termination of this AOC, the EPA agrees that Respondent has adequately complied with all requirements of this AOC, then the EPA may, in its unreviewable discretion, provide written notification of termination of this AOC.

VIII. AOC MODIFICATIONS

52. Any request to modify the terms of, or parties to, this AOC shall be submitted, in writing, by Respondent to the EPA and shall be subject to review and approval by the EPA, in its sole and unreviewable discretion. Respondent's submission of a written request for modification of this AOC shall not relieve Respondent of any obligation under this AOC and shall have no effect on the EPA's statutory or regulatory authority to enforce the terms of this AOC, in its sole and unreviewable discretion.

IX. CHANGE OF OWNERSHIP OR OPERATION OF THE WWTP

53. Until or unless this AOC is modified or terminated, in accordance with the terms of this AOC, Respondent shall remain responsible for compliance with the terms of this AOC following any transfer of ownership or operation of the WWTP.

54. At least ninety (90) days prior to any transfer of ownership or operation of the WWTP, Respondent shall submit a written notification to the EPA of any such anticipated change in ownership or operation of the WWTP (Notification of Change of Ownership or Operation). Each such Notification of Change of Ownership or Operation shall include, at a minimum, a detailed summary of the anticipated change in ownership or operation, contact information for the proposed new owner or operator of the WWTP and a schedule for such anticipated change.
55. Respondent shall condition any sale or transfer of ownership or operation of the WWTP, in whole or in part, upon the execution by such Prospective Third-Party Purchaser, or Transferee, of an agreement, which creates an obligation that shall survive the closing of such sale or transfer, of the WWTP, whereby such Prospective Third-Party Purchaser or Transferee agrees to comply with and be bound by the terms of this AOC.


XI. EFFECTIVE DATE

51. This AOC will become effective upon the Respondent's receipt of a fully-executed copy of this AOC.

AGREED TO:

FOR GIRARDVILLE AREA MUNICIPAL AUTHORITY

Date: 11/25/2025

By: 

Daniel Cress, Sr., Authority Chairman
Girardville Area Municipal Authority

SO ORDERED:

FOR U.S. ENVIRONMENTAL PROTECTION AGENCY

By: _____

[Digitally signed and dated]

Andrea Bain, Acting Director

Enforcement and Compliance Assurance Division

U.S. Environmental Protection Agency, Region 3

(dated via electronic timestamp)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103**

In the Matter of:

Girardville Area Municipal Authority

Respondent.

Girardville Area Municipal Authority
Wastewater Treatment Plant
99 Julia Street,
Girardville, Pennsylvania 17935
Facility ID 110021026101
NPDES Permit No. PA0063312

Facility.

CERTIFICATE OF SERVICE

I certify that the foregoing Administrative Order on Consent was filed with the EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the Administrative Order on Consent. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing Administrative Order on Consent to each of the following persons, in the manner specified below, at the following addresses:

Copies served via UPS and email to:

Mr. Daniel Cress, Sr.
Girardville Area Municipal Authority
99 Julia Street
Girardville, Pennsylvania 17935
Gama1992@ptd.net

Copies served via email to:

Christopher Minott
Assistant Regional Counsel
U.S. EPA, Region 3
Minott.christopher@epa.gov

Brian Tolton
NPDES Enforcement Officer
U.S. EPA, Region 3
Tolton.brian@epa.gov

By:

[Digital Signature and Date]
Regional Hearing Clerk
U.S. EPA, Region 3

Attachment 1

GIRARDVILLE AREA MUNICIPAL AUTHORITY

GIRARDVILLE BOROUGH, PA

CORRECTIVE ACTION PLAN



Prepared by:



Entech Engineering, Inc.
201 Penn Street | PO Box 32 | Reading, PA 19603-0032
(p) 610.373.6667 (f) 610.373.7537

Project No.: 4000.062

Report Dated: May 28, 2025



GIRARDVILLE AREA MUNICIPAL AUTHORITY

CORRECTIVE ACTION PLAN

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GIRARDVILLE AREA MUNICIPAL AUTHORITY

Sanitary Sewer System

Corrective Action Plan

May 2025

1.0 INTRODUCTION

Entech Engineering, Inc (Entech) has prepared this Corrective Action Plan (CAP) on behalf of the Girardville Area Municipal Authority (GAMA) to address the requirements of the Environmental Protection Agency (EPA) provided in an email issued April 23, 2025.

The GAMA wastewater treatment plant (WWTP) has been subject to regular NPDES permit violations over the past several years. Much of the root cause of those violations was addressed with the recent upgrade to the WWTP; however, violations have persisted during extreme wet weather events.

EPA issued a Notice To Show Cause letter via email February 18, 2025. A conference call was held with representatives of the EPA, GAMA, GAMA's solicitor, the Operator from M&B Environmental, Inc ("M&B"), and Entech on April 8, 2025. In a follow-up email on April 28th, Brian Tolton of EPA requested the following information from GAMA:

- Public ordinance for connection to sanitary (Past or future considerations)
- Corrective Action Plan to decrease I&I
- All Infiltration and Inflow studies

GAMA, Entech and M&B met at the WWTP on April 30, 2025 to discuss the potential for operational changes to optimize the WWTP performance during wet weather, recommendations for additional Operator time allowance, and the previous Infiltration and Inflow (I/I) location and remediation efforts.

Entech has collected the historical I/I information and summarized it in this CAP. GAMA provided a copy of their resolution establishing penalties for customers with improper connections to the sewer system (Resolution 2019-10) which is also attached to this CAP. The background data has been assembled in Appendix A; the Resolution is attached as



Appendix B.

Violations identified in the EPA letter under Item 1 “Failure to Properly Operate and Maintain Treatment Units and Equipment”, parts a through d, are currently being addressed by the Operator. This CAP will focus on Item 2 “Effluent Exceedances from Outfall 001 to Mahanoy Creek”.

2.0 THE EXISTING SANITARY SEWER SYSTEM

The collection system serving the Borough of Girardville and surrounding area consists of approximately 40,000 feet 8-inch diameter PVC gravity sanitary mains, 19,500 feet of 4-inch PVC laterals, 214 manholes, and approximately 62 cleanouts. All manholes are of pre-cast concrete construction. There are no pumping stations or holding tanks located within the service area. The collection system and accompanying appurtenances were constructed in the year 2000 and have been in service since January 2001. The condition of the sanitary sewer system can be classified as generally good.

The Authority carried out private property inspections for all properties in the system between 2018 and 2022 and required removal of any sump pumps, roof leaders, or other sources of I/I. During the same period the Authority identified two major sources of I/I in the collection system and made the necessary repairs.

The GAMA WWTP is rated for 0.25 Million Gallons per Day (MGD) and consists of an Influent Pumping Station, Equalization Tank, three (3) Aeration/Clarifier Tanks, Chlorine Dosing Tank, Chlorine Contact Tank, Aerobic Digester (two chambers), Reed Beds for disposal of sludge, a Chlorine Building and a Control Building. The WWTP processes and site are illustrated in Figure 1.

The WWTP Influent Pumping Station is capable of producing a Peak Hourly Flow of approximately 1 MGD. The EQ Tank provides approximately 50,000 gallons of equalization capacity.



Figure 1: GAMA WWTP

3.0 WWTP UPGRADE PROJECT

The WWTP process equipment was replaced in kind as a part of the 2022 WWTP Rehabilitation Project. Construction of the improvements was conducted from November of 2022 through November of 2023. The WWTP hydraulic and organic capacities were not changed as a part of the in-kind equipment repair/replacement. The Project scope included:

- Replacement of the Influent Pump Station Pumps and Controls.
- Replacement of valving inside of the influent forcemain Valve Vault.
- Replacement of the Equalization Tank (EQ Tank) Pumps and Controls, repair and repainting of the tank. The EQ Tank pumps had failed and the tank was not providing significant flow equalization. Following the repairs the EQ Tank has resumed performing as designed.
- Replacement of all blowers and controls, and the air header and valves inside of the Control Building.
- Replacement of the airline from the Control Building to the Aeration/Clarifier Tanks. The airline was damaged, resulting in loss of air volume and pressure to the Aeration system. Following replacement the Aeration process is performing as designed, or better.
- Replacement of the Aeration/Clarifier Tank air headers, drop pipes and diffusers, piping, froth control pumps and controls, repairing and repainting the tanks.
- Replacement of the effluent flow meter, repairing and repainting of the Chlorine Contact Tank.
- Replacement of peristaltic chemical feed pumps for chlorination and dechlorination.
- Replacement of the Utility Water system valves and pumps.
- Replacement of the Aerobic Digester transfer pumps, controls, air headers, drops and diffusers, repair and repainting of the tank.
- Replacement of the airline from the blowers within the Control Building to the Aerobic Digester.
- Removal of debris and sludge from the reed beds, repairing the underdrain piping as needed.



- Flushing and televising the sludge forcemain that transfers treated sludge to the Reed Beds, and replacement of the forcemain valves.
- Replacement of corroded tank cover planks for the Aeration/Clarifier Tanks, Equalization Tank, and Chlorine Contact Tank.
- Replacement of a 200 foot section of the gravity sanitary sewer to repair damage from pipe settlement.
- Replacement of the Control Building HVAC unit and controls.
- Replacement of the Control Building windows.
- Replacement of the emergency autodialer with a larger unit (more channels).
- Replacement of the influent sampler.
- Replacement of Control Building exterior lighting.
- Relocation of the grinder control panel to comply with current NFPA 820 regulations.
- Replacement of the fuel oil tank.

Replacement of the failed equipment allowed the Operator to improve the WWTP performance and minimize NPDES permit violations. Unfortunately, the WWTP improvements were not sufficient to completely prevent violations.

4.0 OPERATIONAL CHANGES

The continued occurrence of effluent violations following the WWTP Upgrade Project are the result of high flows during extreme wet weather events, limited operations budget and Operator site time, and solids management practices. GAMA has provided authorization for the Operator to spend an additional hour every day on site and requested Entech to review the operational needs for the WWTP and provide recommendations for additional Operator time, if warranted.

The Operator has provided GAMA with recommendations for the purchase of additional laboratory equipment to allow on-site testing of solids concentrations, to enhance the operator's ability to track and manage solids within the system. Entech is currently assisting GAMA with obtaining additional cost quotes to meet state procurement

requirements prior to authorizing the equipment purchase.

5.0 SUMMARY OF I/I REDUCTION EFFORTS TO DATE

GAMA has made an effort to reduce I/I over recent years. This section details the efforts made to date.

5.1 Private Property Inspection (PPI): GAMA has completed inspections of all connected properties in the service area. Records of the inspections are maintained on file at GAMA and are available upon request. The raw data is not attached as a part of this CAP, to keep the report size manageable. Sample inspection forms are attached in Appendix C.

Twelve (12) sump pump locations were identified during the inspections. Properties with sump pumps were required to remove the pumps or redirect the discharge outside of Sanitary Sewer System.

Fifty-seven (57) properties with potential roof leader connections with indeterminate discharge points (below grade) were identified. Properties with potentially connected roof leaders were required to modify their roof leaders to redirect discharges to the ground surface.

Sixty-one (61) properties with floor drains in the basement that connect to the sanitary sewer system. Properties with connected floor drains were required to block up the floor drains with concrete.

Seventeen (17) properties with cleanout issues. Properties with cleanouts that were not above grade or had signs of active leakage into the cleanout were required to repair the cleanout to exclude non-sewage water.

5.2 I/I Investigation Work: GAMA completed flow monitoring during 2019 and 2020 with assistance from the EPA and Pennsylvania Rural Water Association. Portable area-velocity flow meters were placed at stream crossing locations within the collection system. Unfortunately, the flow data is fragmentary and poorly documented. The data includes a pdf with imagery identifying two sites:

manholes 107 and 108 and manholes 179 and 180. One of the three locations investigated (MH26 to MH28) does not have a site plan or aerial image. There are charts for all three sites.

Figure 2: I/I Flow Metering location at N Line St MH66 to MH67

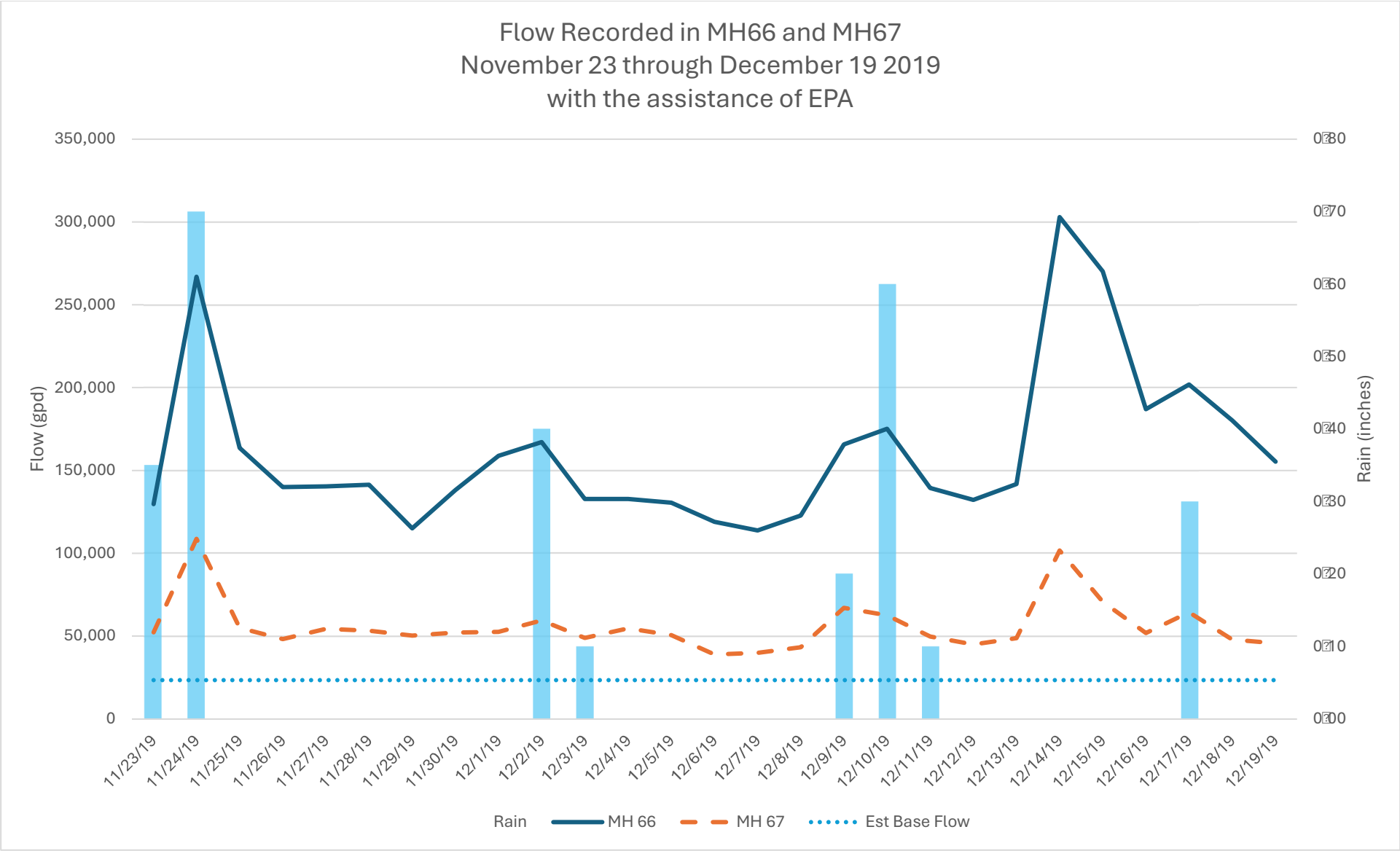


From the GAMA collection system Key Map this section appears to be MH66 and MH67.

Entech was unable to verify the quality of the metering data. Entech remains concerned that the two flow meters were not reading accurately, and we urge caution when interpreting the results of the previous metering effort.

Figure 3 illustrates the flow meter results for the N Line St location. The data suggests that a significant difference in flow was observed from one side of the stream to the other. During dry conditions the difference was approximately 70,000 gallons per day (gpd) which equates to approximately 48 gallons per minute (gpm). During wet weather events the difference increases to as much

Figure 3: Flow Metering Results from 2019-2020 at N Line St



as 200,000 gpd.

Entech calculated an estimated “base flow” for comparison to the flow metering data. The base flow is intended to depict the typical discharge from the properties without any I/I. For a system like GAMA’s where the overwhelming majority of customers are residential, the base flow can be approximated using drinking water meter data. Unfortunately, water meter data was not available at the time of preparation of this CAP. Base flow was therefore projected using the number of properties in the area served by this section of sewer and a conservative flow of 130 gpd per property.

The flow metered in MH67 (upstream) appears to be reasonable. During dry periods the measured flow was approximately 50,000 gpd. Spread across 180 properties this equates to 278 gpd/property, which is high but consistent with areas prone to infiltration and inflow.

The average daily flow measured by the meter was 55,000 gpd. The average daily flow recorded at the WWTP (all sub-basins) during the period from December 1 through December 19, 2019 was 145,000 gpd.

GAMA reports that an effort was made to confirm the source of the apparent additional flow, without success. According to Walter Higgins of EPA, PRWA provided CCTV services to investigate the creek crossings and did not find significant infiltration.

The second image in the PDF provided EPA appears to be correctly attributed as MH179 and MH180. The section of sewer metered includes flow from the part of town south of the Mahanoy Creek, including the downtown area of the Borough.

Figure 4: I/I Flow Metering location at Honesville Rd MH179 to MH180



The source data is not available; however, the PDF contains a graph for MH179 to MH180.

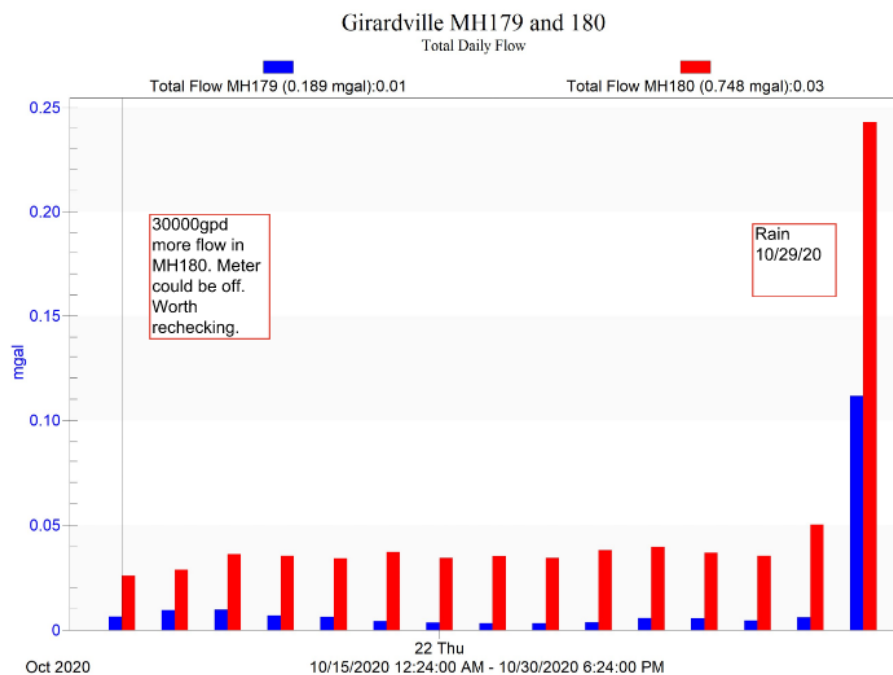
The flow recorded at MH180 appears to be reasonable. The flow recorded at the WWTP (all sub-basins) in October of 2020 was 90,700 gpd. The area served by this meter includes approximately 30% of the customers. The flow data for MH 180 is approximately 40,000 gpd (44% of the flow measured at the WWTP). Approximately 234 properties are served by this subarea. The flow captured by the meter can therefore be said to average 171 gpd/property. The flow data accuracy remains uncertain, but the flow observed appears to be reasonable when compared to the flow recorded at the WWTP during the metering period.

The flow recorded for MH179 is 10,000 gpd or less. The meter appears to have been malfunctioning. Without the source data Entech cannot provide further insight to this meter's performance.

Flow increases significantly for both meters during the rain event October 29, 2020. The graph suggests that the downtown is contributing approximately 200,000 gpd of excess flow on that date. However, limited daily data was available to confirm flows at the WWTP on that day. While we can conclude that flow increased significantly, the exact volume cannot be determined from the data.

No conclusion can be drawn about the nature or magnitude of the issue at this stream crossing from the available data.

Figure 5: Flow Metering Results from 2019-2020 at Honesville Rd

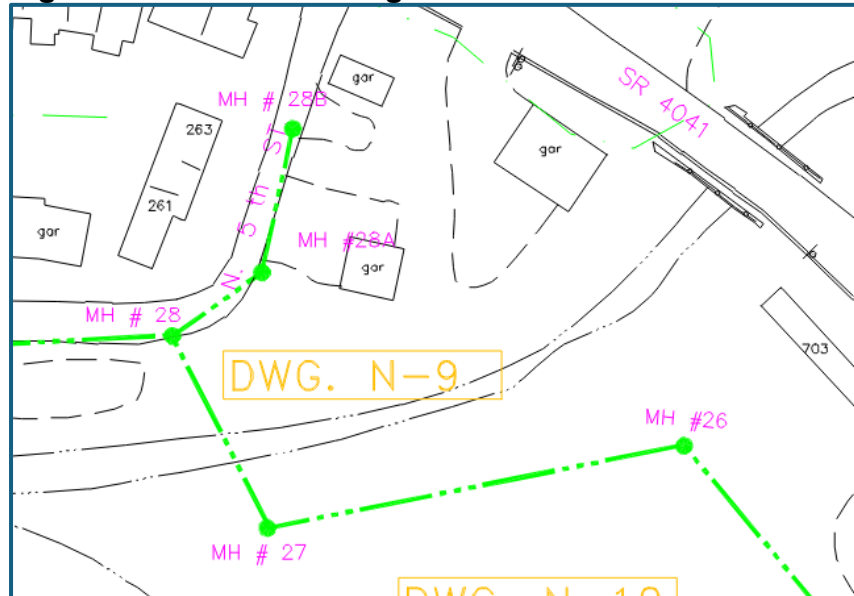


Note: Graph is taken from the pdf provided by EPA.

The third flow metering site included a stream crossing located between MH26 to MH28 along N 5th Street in the eastern portion of the service area. There are no notes in the file indicating why MH27 was not used for metering instead of MH26.



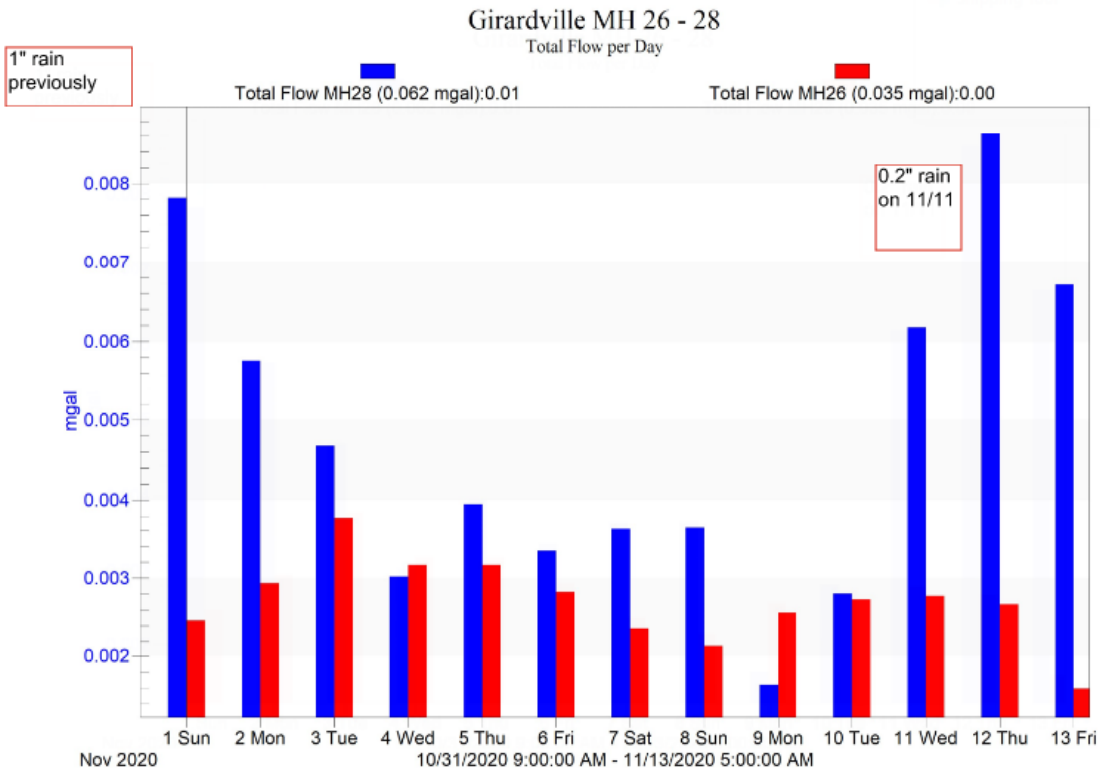
Figure 6: I/I Flow Metering location at North 5th Street



The metering data was collected between November 1, 2020 and November 13, 2020. There are approximately 34 properties upstream of MH26. The average flow in the downstream manhole was 4,600 gpd (137 gpd per property). The upstream meter recorded an average flow of 2,600 gpd (78 gpd per property). The data indicates an increase in flow across the stream crossing of approximately 2,000 gpd during dry weather and up to 6,000 gpd during wet weather events (1.4 gpm to 4.2 gpm).

The data obtained for this location appears to be reasonable; however, caution should be used when interpreting the graph.

Figure 7: Flow Metering Results from 2019-2020 at North 5th Street



Note: Graph is taken from the pdf provided by EPA.

6.0 Corrective Actions

The NPDES violations that have occurred following the WWTP upgrade are the result of high influent flows and solids loss from the clarifiers. The following corrective actions will attempt to address the I/I that is causing the high flows and optimize solids management to minimize any loss of solids from the clarifiers.

6.1 Operational Changes

The following operational changes should improve the solids management at the GAMA WWTP and reduce the potential for solids loss:

- 6.1.1 Operator Time on Site: The Operator's ability to plan for and respond to high flow events and to maintain the WWTP are constrained by the hours



on site authorized in the agreement between GAMA and the contract operations company (M&B). GAMA and Entech have discussed the operations and potential additional time that may be justified. These discussions need to be continued and the operational practices reviewed in detail. Entech will issue a formal recommendation for Operator time on site.

6.1.2 Update Solids Management Plan: The operational practices will be reviewed in detail with the Operator. Following the detailed operations review the frequency of the following tasks will be adjusted and recommendations made to improve documentation:

- Solids testing of the WAS and RAS
- Solids testing of the Digester Contents/material discharged to the Reed Beds
- Sludge blanket levels in the clarifier
- Accumulated Solids in the EQ Tank

6.1.3 Update Wet Weather Management Plan: Following the review of solids management practices, the Wet Weather Management Plan should be updated.

6.2 Additional I/I Investigation and Repair

Reduction of I/I is essential to eliminating the NPDES violations. The sources and magnitude of I/I will be identified through the processes of Flow Chasing and Flow Metering. The results will enable GAMA to target additional investigation measures as needed to identify the sources of I/I. Those additional measures may include CCTV inspection of the sewer pipes, smoke testing, and/or dye testing, as appropriate based on the meter data analysis. Private Property Inspection will remain an important part of the I/I removal process.

6.2.1 Flow Chasing involves opening manholes during and immediately after significant precipitation events to obtain a visual understanding of the flow magnitude. Investigators “chase” the excess flow back to its source

through visual observation. The process is not highly accurate but can provide a general understanding of the sources of I/I where sources are limited to specific portions of the collection system. Flow Chasing requires limited equipment and manpower, and can help focus other forms of investigation to maximize the I/I removal efficiency and minimize costs.

6.2.2 Flow Metering involves the use of portable area-velocity flow meters placed at strategic portions of the collection system. Flow Chasing can help refine the locations for Flow Metering. The process requires regular meter maintenance, flow data downloads, and review of data to assess meter performance. The metering results will provide insight into the magnitude and sources of I/I and will assist in targeting sections of the collection system for further investigation and, ultimately, rehabilitation.

GAMA has reached out to the EPA Region 3 contact for compliance assistance and the Pennsylvania Rural Water Association in the hope of securing flow metering assistance. As soon as meters become available GAMA will place them in the collection system and begin data collection. Entech has prepared a suggested priority list for locations in which to monitor flow, using three flow meters:

1. Repeat flow metering at Manholes MH66 and MH67 to confirm influence from the stream crossing. Place the third meter at MH164A or MH164B to identify the flow split between the major subareas north of the creek.



Figure 8: Area-velocity flow meter (above) and meter sensor installed in the sewer (below)

2. Repeat flow metering at manholes MH179 and MH180 to confirm influence from the stream crossing. Place the third meter at MH178 to identify the flow split between the two subarea to the south of the creek (roughly identified as sewers along Main Street and Oak Street)
3. Depending on the findings from the first two phases, place two meters at MH93 on East Ogden Street at North Second Street to further subdivide the subareas that provide flow to MH67.

OR

Place the meters at MH63, MH59, and MH60A to subdivide the area north of the creek.

OR

Place the meters at MH172 and MH149 on West Main Street, and MH154 on Preston Avenue. The GAMA Board has noted some clear flow was observed by staff in the area of Preston Avenue at Silver Street.

Flow meters should be placed in the collection system as soon as they become available. Weather conditions are unpredictable and, generally, there is a limited window in the spring and fall to capture good flow data. Sufficient resources and manpower should be made available to move the meters to the next target area as soon as practical after good data is collected at the first location. Depending on the weather and meter availability, flow metering may require the fall and spring 2026 wet seasons to collect adequate data.



6.2.3 Smoke Testing: Inflow sources including connected roof leaders, yard drains, foundation drains, and interconnections with storm sewers can be identified with smoke testing. A non-toxic smoke is blown into the sewer system using a blower that is placed in an open manhole top. The smoke follows the sewer line, moves up the laterals, and into any connections. This can lead



Figure 9: Smoke Testing Blower

to smoke entering homes where internal piping is not well maintained, so notices are provided to residents before the smoke testing begins using door-hanger style flyers.

Smoke testing typically requires three people minimum, a blower unit, and a smoke source (liquid or solid). Figure 9 illustrates a typical blower with liquid smoke. Once the smoke fills a section of the sewer system the team members walk the area and record observed issues.

If the soil conditions are dry enough smoke will be visible issuing from the ground where sewer main or lateral pipes are broken. Figure 10 provides examples of smoke testing results from past Entech projects in other systems, including downspouts, broken laterals, broken mains, open cleanouts, yard drains, cellar drains, manholes, storm sewer cross connections, and abandoned sewer lines.

Figure 10: Smoke Testing Example Results



6.2.4 Private Property Inspections (PPI): Review of the available data suggests that a significant portion of the I/I is generated from private property connections and sewer facilities including laterals, rain leaders and sump pumps. GAMA has been performing PPI since 2019 in an effort to locate sources of I/I. Sources of I/I originating on the customer-side are often difficult to remove and can require several rounds of corrective action before the sources are permanently removed. It should

be noted that sump pumps can be persistent based on issues outside of GAMA's direct control. For example, low-lying areas without adequate stormwater management facilities can prevent excess water from leaving the site and result in a constant infiltration of water into basements. Partnering with the Borough to improve stormwater facilities may be necessary to eliminate sump pumps over the long term.

GAMA will review their inspection records, develop a list of properties that may require further inspection, and prepare a plan for future PPI. The plan scope may require multiple years to complete, depending on the number of non-compliant properties identified. As a minimum, GAMA plans to revisit properties that were given corrective action notices following the first round of inspection and determine if further corrective action is needed.

- 6.2.5 Inspect Stream Crossings: The flow metering data collected in 2019 and 2020 suggested that two stream crossings may be impacted by I/I; however, subsequent CCTV inspection did not find evidence of I/I. This appears to rule out leaking pipe joints. No records indicated the condition of the manholes or whether the water-tight lids were in place and sealed during the flow monitoring. Prior to commencement of any new flow metering GAMA will inspect the manholes located at the stream crossings and verify that the water-tight manhole lids are in place and properly sealed.

7.0 Schedule

GAMA will complete the necessary actions according to the following schedule.

Item	Description	Target Date
1	Complete lab equipment purchase and initiate additional solids testing	July 1, 2025
2	Entech to complete review of Operator Time on Site needs and solids management, issue recommendation to GAMA	August 1, 2025
3	Investigate stream crossings: inspect manholes, verify water-tight lids are intact	August 1, 2025
4	Private Property Inspections: review existing records and determine if any re-inspection is warranted	August 1, 2025
5	Implement recommendations for Operator time on site and solids management; update Wet Weather Management Plan and Solids Management Plan	September 1, 2025
6	Private Property Inspections: Carry out re-inspections	July 1, 2026
7	Complete additional flow metering in the collection system	July 1, 2026
8	Complete targeted Smoke Testing of the collection system based on flow metering results	September 1, 2026
9	Prepare a report documenting the flow metering and smoke testing; recommend areas for CCTV inspection work	October 1, 2026
10	Complete CCTV inspection of recommended areas	August 1, 2027
11	Prepare a report identifying repairs needed to the collection system based on the CCTV findings	September 1, 2027
12	Plan and execute repairs to the collection system identified as needs during CCTV work	October 1, 2028



APPENDIX A: Background Data



REGION 3
PHILADELPHIA, PA 19103

VIA ELECTRONIC MAIL

Girardville Area Municipal Authority's
Waste Water Treatment Plant
c/o Edward Burns, Authority Chairman
99 Julia Street
Girardville, Pennsylvania 17935
Gama1992@ptd.net

Re: Notice to Show Cause
Pursuant to Section 301 of the Clean Water Act
Facility ID 110021026101; Permit No. PA0063312

Dear Mr. Burns:

This letter is in reference to a compliance investigation performed by the United States Environmental Protection Agency, Region 3 (the "EPA" or the "Agency") for the Waste Water Treatment Plant located at 99 Julia Street, Girardville, Schuylkill County, Pennsylvania ("Facility"). The Facility is owned and/or operated by the Girardville Area Municipal Authority ("Girardville Authority").

With this letter the EPA hereby provides notice of alleged violations of Section 301 of the Clean Water Act, 33 U.S.C. §§ 1311, for which the Girardville Authority may have liability.

Section 301 of the Clean Water Act, 33 U.S.C. § 1311, prohibits the discharge of any pollutant from a point source to a water of the United States, except in compliance with, among other things, an NPDES permit issued pursuant to Section 402 of the Clean Water Act, 33 U.S.C. § 1342. Pursuant to the authorities delegated to it under Subsection 402(b) of the Clean Water Act, the Commonwealth of Pennsylvania had issued an NPDES permit, NPDES Permit No. PA0063312 ("Permit"), to the Girardville Authority for the Facility.

Pursuant to the EPA's authority under Section 308 of the Clean Water Act, 33 U.S.C. § 1318, EPA Inspectors conducted an inspection of the Facility on June 28, 2023, to determine Girardville Authority's compliance with its Permit for the Facility (the "Inspection").

Based on the observations of its Inspection, the EPA alleges that Girardville Authority violated various terms and conditions of the Permit. Accordingly, the EPA is extending an invitation to Girardville Authority to discuss the Agency's conclusions and present any additional information

the EPA should consider with respect to the alleged violations summarized in the section below entitled, “Violations Identified by the EPA.”

FACILITY OPERATIONS/FACTUAL BACKGROUND

The Facility is a waste water treatment plant owned and operated by Girardville Authority with an operational capacity of 0.24 million gallons per day that discharges into Mahanoy Creek. Girardville Authority has contracted out operation of the Facility to M&B Environmental, Inc. The Facility has one comminutor/bar screen, one 50,000-gallon equalization tank, three aeration/clarification tanks, and one two-chamber chlorine contact tank. Sludge is aerobically digested and then sent to four reed beds located at the Facility.

During the Inspection, the Facility treatment units were undergoing upgrades, including installation of new equipment, and rehabilitation and repairs to existing equipment.

VIOLATIONS IDENTIFIED BY THE EPA

1. Failure to Properly Operate and Maintain Treatment Units and Equipment

Part B Section I.E.2 of the Permit requires Girardville Authority to properly operate and maintain all facilities and systems of treatment and control. During the Inspection, EPA inspectors noted that:

- a. the operations and maintenance manual provided by the operator appeared to be outdated;
- b. the scum trough of the second aeration/clarification tank was overtopped and overflowing into the tank;
- c. a floor drain in the chemical storage building was adjacent to sodium bisulfite containers that were not in secondary containment; and
- d. Two of the four waste water treatment plant sludge reed beds were offline due to a damaged and leaking conveyance line.

Additionally, the EPA notes that, during the time of the Inspection, the individual primarily responsible for the Facility’s operations possessed a lapsed waste water treatment license.

2. Effluent Exceedances from Outfall 001 to Mahanoy Creek

Part A of the Permit defines effluent limitations and monitoring requirements for Outfall 001 discharges from the Facility into Mahanoy Creek. The June 2023 sampling results sheet observed during the inspection indicates effluent dissolved oxygen was 2.43 on June 25, 2023, which is below the minimum effluent limit of 4.0 contained in the Permit.

Additionally, prior to and after EPA’s Inspection, the Facility had numerous effluent exceedances from May 2018 to December 2024, summarized in Table 1 below:

Table 1: Facility Effluent Exceedances from May 2018 – Dec 2024

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
05/31/2018	001	Solids, total suspended	WKLY AVG	212.5 lb/d	<=127.6 lb/d	67%
07/31/2018	001	Coliform, fecal general	INST MAX	1,800 cfu/100ml	<=1,000 cfu/100ml	80%
01/31/2019	001	pH	MINIMUM	5.8 su	>=6 su	
02/28/2019	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	42.5 mg/l	<=40 mg/l	6%
03/31/2019	001	Chlorine, total residual	MO AVG	1.2 mg/l	<=1 mg/l	20%
07/31/2019	001	Solids, total suspended	WKLY AVG	74 mg/l	<=45 mg/l	64%
06/30/2020	001	Coliform, fecal general	INST MAX	3,400 cfu/100ml	<=1,000 cfu/100ml	240%
07/31/2020	001	Oxygen, dissolved [DO]	MINIMUM	.8 mg/l	>=4 mg/l	80%
07/31/2020	001	Coliform, fecal general	INST MAX	4,000 cfu/100ml	<=1,000 cfu/100ml	300%
08/31/2020	001	pH	MINIMUM	5.9 su	>=6 su	
10/31/2020	001	Solids, total suspended	WKLY AVG	57.5 mg/l	<=45 mg/l	28%
11/30/2020	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
12/31/2020	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
01/31/2021	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
01/31/2021	001	Coliform, fecal general	INST MAX	12,200 cfu/100ml	<=10,000 cfu/100ml	22%
05/31/2021	001	Oxygen, dissolved [DO]	MINIMUM	2.24 mg/l	>=4 mg/l	44%
05/31/2021	001	Solids, total suspended	MO AVG	41 mg/l	<=30 mg/l	37%
05/31/2021	001	Coliform, fecal general	INST MAX	56,000 cfu/100ml	<=1,000 cfu/100ml	5,500%
06/30/2021	001	Oxygen, dissolved [DO]	MINIMUM	3.8 mg/l	>=4 mg/l	5%
07/31/2021	001	Solids, total suspended	WKLY AVG	53 mg/l	<=45 mg/l	18%

Notice to Show Cause

Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
08/31/2021	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
09/30/2021	001	Oxygen, dissolved [DO]	MINIMUM	2.5 mg/l	>=4 mg/l	38%
09/30/2021	001	Solids, total suspended	MO AVG	<1,467.4 lb/d	<=85 lb/d	1,626%
09/30/2021	001	Solids, total suspended	WKLY AVG	3,801.2 lb/d	<=127.6 lb/d	2,879%
09/30/2021	001	Solids, total suspended	MO AVG	<179.6 mg/l	<=30 mg/l	499%
09/30/2021	001	Solids, total suspended	WKLY AVG	396.7 mg/l	<=45 mg/l	782%
09/30/2021	001	Coliform, fecal general	GEO MEAN	1,363 cfu/100ml	<=200 cfu/100ml	582%
09/30/2021	001	Coliform, fecal general	INST MAX	96,400 cfu/100ml	<=1,000 cfu/100ml	9,540%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	<7,706.6 lb/d	<=70.8 lb/d	10,785%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	658 lb/d	<=113.4 lb/d	480%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	<35 mg/l	<=25 mg/l	40%
09/30/2021	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	72.5 mg/l	<=40 mg/l	81%
10/31/2021	001	Solids, total suspended	WKLY AVG	89 mg/l	<=45 mg/l	98%
11/30/2021	001	Solids, total suspended	MO AVG	123 lb/d	<=85 lb/d	45%
11/30/2021	001	Solids, total suspended	WKLY AVG	300.1 lb/d	<=127.6 lb/d	135%
11/30/2021	001	Solids, total suspended	MO AVG	77.2 mg/l	<=30 mg/l	157%
11/30/2021	001	Solids, total suspended	WKLY AVG	182 mg/l	<=45 mg/l	304%
01/31/2022	001	Solids, total suspended	WKLY AVG	137.4 lb/d	<=127.6 lb/d	8%
01/31/2022	001	Solids, total suspended	MO AVG	51.3 mg/l	<=30 mg/l	71%

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Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
01/31/2022	001	Solids, total suspended	WKLY AVG	158 mg/l	<=45 mg/l	251%
01/31/2022	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
01/31/2022	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	54 mg/l	<=40 mg/l	35%
02/28/2022	001	Solids, total suspended	MO AVG	31.6 mg/l	<=30 mg/l	5%
02/28/2022	001	Solids, total suspended	WKLY AVG	59.5 mg/l	<=45 mg/l	32%
05/31/2022	001	Oxygen, dissolved [DO]	MINIMUM	3.93 mg/l	>=4 mg/l	2%
09/30/2022	001	Solids, total suspended	WKLY AVG	478.8 lb/d	<=127.6 lb/d	275%
09/30/2022	001	Solids, total suspended	MO AVG	62.3 mg/l	<=30 mg/l	108%
09/30/2022	001	Solids, total suspended	WKLY AVG	345 mg/l	<=45 mg/l	667%
09/30/2022	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	195.7 lb/d	<=113.4 lb/d	73%
09/30/2022	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	<37.4 mg/l	<=25 mg/l	50%
09/30/2022	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	141 mg/l	<=40 mg/l	253%
10/31/2022	001	Solids, total suspended	WKLY AVG	56 mg/l	<=45 mg/l	24%
12/31/2022	001	Coliform, fecal general	INST MAX	>20,000 cfu/100ml	<=10,000 cfu/100ml	99,999%
04/30/2023	001	Oxygen, dissolved [DO]	MINIMUM	2.5 mg/l	>=4 mg/l	38%
05/31/2023	001	Coliform, fecal general	INST MAX	20,000 cfu/100ml	<=1,000 cfu/100ml	1,900%
06/30/2023	001	Coliform, fecal general	INST MAX	6,300 cfu/100ml	<=1,000 cfu/100ml	530%
07/31/2023	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	47.7 mg/l	<=40 mg/l	19%

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Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
08/31/2023	001	Coliform, fecal general	INST MAX	2,700 cfu/100ml	<=1,000 cfu/100ml	170%
08/31/2023	001	Coliform, fecal general	INST MAX	354 cfu/100ml	<=200 cfu/100ml	77%
11/30/2023	001	Solids, total suspended	WKLY AVG	90 mg/l	<=45 mg/l	100%
12/31/2023	001	Coliform, fecal general	INST MAX	10,300 cfu/100ml	<=10,000 cfu/100ml	3%
1/31/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	163.7 lb/d	113.4 lb/d	44%
1/31/2024	001	Coliform, fecal general	INST MAX	>20,000 cfu/100ml	<=10,000 cfu/100ml	100%
1/31/2024	001	Chlorine, total residual	INST MAX	2.2 mg/l	<=1.6 mg/l	38%
2/29/2024	001	Coliform, fecal general	INST MAX	19,100 cfu/100ml	<=10,000 cfu/100ml	91%
4/30/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	53.9 mg/l	<=40 mg/l	35%
4/30/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	303.0 lb/d	<=113.4 lb/d	168%
4/30/2024	001	BOD, carbonaceous [5 day, 20 C]	MO AVG	82.4 lb/d	<=70.8 lb/d	16%
4/30/2024	001	Coliform, fecal general	INST MAX	20,000 cfu/100ml	<=10,000 cfu/100ml	100%
4/30/2024	001	Solids, total suspended	WKLY AVG	213.7 lb/d	<=127.6 lb/d	67%
4/30/2024	001	Solids, total suspended	MO AVG	99.8 lb/d	<=85 lb/d	17%
7/31/2024	001	BOD, carbonaceous [5 day, 20 C]	WKLY AVG	96.4 mg/l	<=40 mg/l	141%
7/31/2024	001	Solids, total suspended	WKLY AVG	533 mg/l	<=45 mg/l	1,084%
7/31/2024	001	Solids, total suspended	MO AVG	<109.2 mg/l	<=30 mg/l	264%
7/31/2024	001	Solids, total suspended	WKLY AVG	506.8 lb/d	<=127.6 lb/d	297%

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Monitoring Period End Date	Outfall	Parameter	Reporting Frequency	Reported Value/Units	Limit Value/Units	% Exceedance
7/31/2024	001	Solids, total suspended	MO AVG	<103.2 lb/d	<=85 lb/d	21%

It is the EPA's position that Girardville Authority is responsible for compliance with the Permit. To the extent there are any ongoing violations of the Permit issued to Girardville Authority for Facility, Girardville Authority is responsible for immediately remedying those violations to bring the Facility into compliance.

OPPORTUNITY TO CONFER

Pursuant to the Clean Water Act, the EPA has authority to seek compliance and penalties to address violations of the Clean Water Act through a civil action in federal district court, or through administrative actions, that may involve a demand for payment of civil penalties and injunctive relief. By this letter, the EPA is extending to you an opportunity to provide the Agency with any further information related to the facts and circumstances of the alleged violations that you would like the EPA to consider with respect to the alleged violations.

The EPA is also offering Girardville Authority the opportunity to discuss with the Agency the possibility of entering into a settlement of the violations without protracted litigation. Potential penalties would be assessed and resolved in accordance with Section 309 of the Clean Water Act, 33 U.S.C. § 1319, and the Interim Clean Water Act Settlement Penalty Policy of March 1, 1995, and 40 C.F.R. Part 19 (Civil Monetary Penalty Inflation Adjustment), which provide that any person who violates a requirement of Section 309 of the Clean Water Act may be liable to the United States for a civil penalty in an amount not to exceed \$68,445 per day for each violation.

NEXT STEPS

If you would like to confer with the EPA about anything in this letter, Girardville Authority should make the request within **fourteen (14) calendar days** following your receipt of this letter. The EPA expects that any conference will be held within thirty **(30) calendar days** following your receipt of this letter. Please send the response by electronic mail to the EPA contacts listed below and include any relevant documents that you would like the EPA to consider.

As part of any submission of information or documentation to the EPA, Girardville Authority must include the following signed and dated certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining or compiling the information, I believe that the submitted information is true, accurate, and complete. I recognize that

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there are significant penalties for submitting false and/or misleading information, including the possibility of fines and/or imprisonment (18 U.S.C. § 1001).

Signature: _____

Printed Name: _____

Title: _____

Date: _____

To resolve a penalty, the EPA may also consider a violator's voluntary performance of a Supplemental Environmental Project ("SEP") when determining an appropriate penalty amount. A SEP is a project that is not otherwise legally required of, or planned by, a violator, which is designed to either (1) reduce the likelihood that similar violations will occur in the future, (2) reduce adverse public health and/or environmental impacts to which the violations contributed, or (3) reduce the overall risk to public health and/or the environment potentially affected by the violations. If you are interested in proposing or discussing performance of a SEP as part of the settlement of this matter, please review the [EPA's 2015 SEP Policy](#)¹ prior to our meeting. The EPA would welcome the discussion of any proposals or questions you may have about potential SEPs.

Girardville Authority is entitled to assert a claim of business confidentiality ("CBI claim") for any information submitted to the EPA; however, Girardville Authority must make any assertion of a CBI claim in the manner described in 40 C.F.R. § 2.203(b). The EPA will make information subject to a CBI claim available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a CBI claim is asserted at the time the information is submitted to the EPA, the Agency may make this information available to the public without further notice to Girardville Authority.

The EPA has not determined whether Girardville Authority constitutes a "small business" under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). The EPA's [Small Business Resources Information Sheet](#)² provides information on (1) contacting the SBREFA Ombudsman to comment on Federal enforcement and compliance activities and (2) compliance assistance. Any decision to participate in such program or to seek compliance assistance does not relieve Girardville Authority of its obligation to respond in a timely manner to an EPA information request or other enforcement action and does not create any new rights or defenses under law.

Submission of any additional information for consideration by the EPA is **voluntary**. This letter is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

If you do not respond to this letter within **fourteen (14) days**, the EPA reserves the right to pursue an enforcement action to address any violations that the Agency determines have been committed without further advance notice to Girardville Authority. If the EPA pursues an enforcement action, you will receive instructions that describe your right to dispute the EPA's claims, including the opportunity for a full evidentiary hearing before an administrative law judge. Any enforcement action would be

¹ <https://www.epa.gov/enforcement/2015-update-1998-us-epa-supplemental-environmental-projects-policy>

² <https://www.epa.gov/compliance/small-business-resources-information-sheet>

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undertaken in accordance with Section 209 of the Clean Water Act, 33 U.S.C. § 1319, and the Interim Clean Water Act Settlement Penalty Policy of March 1, 1995.

Please direct any questions or written correspondence regarding this letter or any linked documents to:

Brian Tolton
Enforcement Officer
215-814-3291
tolton.brian@epa.gov

Or have your attorney contact:

Christopher Minott
Assistant Regional Counsel
215-814-2484
minott.christopher@epa.gov

We look forward to hearing from you soon.

Sincerely,

Karen Melvin
Director
Enforcement and Compliance Assurance Division

cc: Christopher Minott, EPA Region 3
Brian Tolton, EPA Region 3
Jared Sabitsky, PADEP

APPENDIX B: Resolution

**GIRARDVILLE AREA MUNICIPAL AUTHORITY
SCHUYLKILL COUNTY, PENNSYLVANIA
RESOLUTION NO. 2019-10**

**A RESOLUTION AMENDING AND SUPPLEMENTING PRIOR RATE
RESOLUTIONS/ORDINANCES AND PROVIDING FOR AND ESTABLISHING
SEWER RATES FOR ROOF LEADERS, SUMP PUMP AND FOUNDATION/FLOOR
DRAINS CONNECTED TO THE SANITARY SYSTEM**

WHEREAS, the Girardville Area Municipal Authority (GAMA) is a municipal authority organized by the Borough of Girardville under the Laws of the Commonwealth of Pennsylvania, specifically the *Municipal Authorities Act of 1945* as amended, et seq.; and

WHEREAS GAMA, through ordinance, intermunicipal agreements and other agreements, is charged with the responsibility of providing sanitary sewage collection and treatment services for the Borough of Girardville and areas of Butler Township and other adjacent areas outside the Borough of Girardville's limits; and

WHEREAS GAMA has found that the discharge of any clean surface water, including water from roof or cellar drains, springs, basement sump pumps and French drains contributes to the flooding and overloading of the sanitary sewage treatment facility and wastewater collection system operated by GAMA for the benefit of and in and through the said areas it services; and

WHEREAS such overloading may result in sewage flowing into basements and/or residences, businesses and over land creating hazardous public health conditions and significant damage to properties; and

WHEREAS the treatment of such clean surface water as described above, may limit the capacity of the treatment facility to properly service the sanitary sewer needs of the Girardville area, contributes to the premature aging of the sewage treatment and collection facilities all of which potentially adversely affects the economic development and expansion of the Girardville area; and

WHEREAS the GAMA has previously passed Ordinances which prohibit the discharge of clean surface water into the GAMA collection system, and specifically prohibit the connection of roof leaders, sump pumps and foundation/floor drains to the sanitary sewage collection system; and

WHEREAS GAMA has the authority and duty pursuant to the laws of the Commonwealth of Pennsylvania to establish reasonable rates uniformly applied to users of the system in order to fund the cost of sanitary sewage collection and treatment; and

NOW THEREFORE, BE IT RESOLVED by the Board of the Girardville Area Municipal Authority this 21st day of November, 2019, that the sewer fees and rates established by the GAMA be amended as follows:

I. SURCHARGE

A. Effective July 1, 2020, a surcharge is hereby imposed on every property serviced by the Girardville Area Authority to be included on every sewer bill sent to the property owners for the following conditions:

1. Sump Pump(s) connected to the sanitary sewer system- 1EDU
2. Roof Leader(s) connected to sewer system- 1EDU
3. Floor/Foundation Drain(s) connected to the
sewer system 1EDU

B. Said surcharge will be imposed and included on all bills sent to the property owner(s) effective July 1, 2020. An "EDU" (Equivalent Dwelling Unit) shall be defined for the purpose of this Resolution as the basic charge for a single dwelling unit.

C. No owner, occupant or user of any premises is permitted to direct into or allow any storm water (including rain water), surface water or ground water to drain into the GAMA wastewater collection system, nor shall roof leaders, any form of surface drainage, foundation drainage or sump pump(s) be connected or discharged into the GAMA wastewater collection system. For the purposes of charging the rate surcharges set forth in this resolution, it shall be presumed that all properties have all three of the conditions set forth in section IA above, unless exempted as set forth in this Resolution.

II. EXEMPTION FROM SURCHARGE

A. A customer or property owner may avoid such surcharge by notifying the GAMA administrative offices and arranging for an inspection of the property and premises by GAMA personnel who is then able to confirm that the property does not have a sump pump(s), roof leader(s) or floor/foundation drain(s) situate on the premises or if such pump(s), roof leader(s) or floor/foundation drain(s) are located upon the said property, that they are not connected to and do not discharge into the GAMA sanitary collection and treatment sewer system and that any discharge pipes that service a building upon the premises are constructed in compliance with this rate resolution in order to prevent such discharge into the GAMA sanitary sewage collection and treatment system.

B. In order to qualify for the exemption from the said surcharge under section IIA, any discharge system of discharging storm water, (including rain water) surface water or ground water from a building upon premises served by the GAMA wastewater collection and treatment system, shall have a discharge pipe installed through the outside foundation wall of the building with rigid pipe without valves or quick connections that would alter the path of the discharge. the discharge shall be directed away from the foundation wall. The discharge shall also be directed as to avoid impact upon neighboring properties.

C. The property owners or individuals in charge of the premises served by the GAMA sanitary sewer collection, shall permit a GAMA designated representative to inspect all buildings

upon the premises to confirm that there is no sump pump(s), roof leader or floor/foundation drain(s) discharging into the GAMA wastewater collection system.

1. In the event that a customer or property owner refuses to allow any inspection or does not respond to a request to inspect, or fails to request an inspection by June 1, 2020 the sewer billing for that customer shall be *based upon the property having all three conditions* set forth in section IA above, connected to the GAMA wastewater collection system, together with the standard billing for that respective customer or property.

2. GAMA may periodically reinspect any building, including garages or outbuildings, located upon the premises to determine continued compliance with the requirements of this resolution and to insure that the surcharge rate is not applicable.

3. In the event a reinspection determines that any one of the said connections to the GAMA sanitary sewer system is in place, the surcharge shall be imposed for the entire quarter in which the inspection reveals the connection as well as the quarter prior to that connection and the surcharge shall continue until it is verified by subsequent reinspection that the said connection has been removed permanently and that any discharge pipes are constructed in conformance with this resolution.

4. In the event that property has been discovered to have its sump pump(s), roof leader or floor/foundation drain(s) reconnected after the inspection and disconnection has been certified by the appropriate GAMA representative, said property shall be subject to a quarterly inspection by a GAMA designated representative in order to insure continued compliance with this Resolution. Unless otherwise set by further resolution, *the fee for such a quarterly inspection shall be fifty (\$50.00) which shall be added to the monthly sewer bill.*

III. GENERAL PROVISIONS

A. Any ordinance or resolution passed and approved prior to the passage and approval of this Resolution to the extent that it is not inconsistent with this Resolution is hereby retained. Any ordinance or resolution that is irreconcilable with and in direct conflict with this resolution is hereby repealed.

B. This Resolution shall take effect and be in full force upon its passage and approval as required by law.

C. The provisions of this Resolution are separable and severable and the invalidity of any phrase, clause or part of this Resolution shall not effect the validity or effectiveness of the remainder of this Resolution.

RESOLVED the date and year first written above.

GIRARDVILLE AREA MUNICIPAL AUTHORITY

BY: Edward Burns
PRESIDENT

Marie Finlan
VICE PRESIDENT

Julie A. Zangari
SECRETARY

GIRARDVILLE AREA MUNICIPAL AUTHORITY

4th & "B" Streets, Borough Hall

P.O. Box 146

Girardville, Pennsylvania 17935

Edward Burns, Chairman

Marie Finlan, Vice-chairman

Phone: 570-276-1635

Fax: 570-276-1640

Exhibit 7 – Resolution 2019-11

Be it RESOLVED, that the Girardville Area Municipal Authority of Schuylkill County hereby requests a PA Small Water and Sewer grant of \$125,248.00 from the Commonwealth Financing Authority to be used for the Wastewater Treatment Plant Upgrades project.


Be it FURTHER RESOLVED, that the Girardville Area Municipal Authority does hereby designate Edward Burns, Chairman and Marie Finlan, Authority Member as the officials to execute all documents and agreements between the Girardville Area Municipal Authority and the Commonwealth Financing Authority to facilitate and assist in obtaining the requested grant.

I, Julie Zangari, duly qualified Secretary of the Girardville Area Municipal Authority, Schuylkill County, PA, hereby certify that the forgoing is a true and correct copy of a Resolution duly adopted by a majority vote of the Girardville Area Municipal Authority at a regular meeting held November 21, 2019 and said Resolution has been recorded in the Minutes of the Girardville Area Municipal Authority and remains in effect as of this date.

IN WITNESS THEREOF, I affix my hand of the Girardville Area Municipal Authority this 21st day of November, 2019.

Girardville Area Municipal Authority

Schuylkill County



Julie Zangari, Secretary

APPENDIX C: Sample PPI Inspection Forms

GAMA Sanitary Sewer Inspections

Account Number: _____

Address of Owner(s): _____

Property Owner(s): _____

Contact: _____ (Home) _____ (Cell)

Type of Construction (Check Type):

1. Residential

a. Single Family Dwelling Unit _____

b. Multiple Family Dwelling Unit _____

(1). Number of Units _____

2. Commercial

a. Store, Shop, etc. _____

b. Office _____

(1). Number of Units _____

3. Industrial

a. Type of Product _____

b. Number of Occupants _____

4. Institutional

a. Type of Institution _____

b. Number of Occupants _____

Inspection Of: Circle Yes or No

1. Sump pump(s) connected to the sanitary sewer system?

Yes No _____

2. Roof leader(s) connected to the sanitary sewer system?

Yes No _____

3. Floor/Foundation Drain(s) connected to the sanitary sewer system?

Yes No _____

If Yes to any of the above:

Correction Required: _____

Follow-Up: _____

Property Owner's Signature: _____

Inspectors' Signatures: _____

Date: _____ Time: _____

Girardville Area Municipal Authority Outside Property Inspection Report

Street Address: _____
Date: _____
Inspected By: _____
Weather Condition: _____
Building Type: _____

<input type="checkbox"/>	Residential, Single Unit
<input type="checkbox"/>	Residential, Double Unit
<input type="checkbox"/>	Residential, Multiple Unit
<input type="checkbox"/>	Industrial
<input type="checkbox"/>	Commercial
<input type="checkbox"/>	Government

Upstream Manhole No.: _____

Downstream Manhole No.: _____

- | | | |
|---|------------------------------|-----------------------------|
| 1. Are the vent and cleanouts above grade? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 2. Is there evidence of surface runoff getting into the vents? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 3. Is flow apparent in lateral?
(view the flow through a cleanout or the vent) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4. Do the roof leaders from the building go underground? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4a. Does there appear to be a discharge
point for these roof leaders? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4b. If Yes, where is the discharge located? | _____ | |

Lateral Location Sketch

*Indicate the location of the sewer lateral in relation to the building(s) on the property.
Include discharge location(s) of roof leaders on the property and street names.