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NOTIFICATION OF COMPLETION

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| **Case Name:** | U.S., ET AL. V. CAPITAL REGION WATER AND THE CITY OF HARRISBURG, PA |
| **Court:** | PA M.D. Pa.; 3rd Cir. |
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Sherertz, Alexandra

CAPITAL REGION.
WATER

U.S. DEPARTMENT OF JUSTICE
ENVIRONMENT AND NATURAL
RESOURCES DIVISION

MAY 11 2020

EXECUTIVE OFFICE

April 29, 2020

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
601 D Street NW
Washington, D.C. 20004
Re: DOJ No. 90-5-1-1-10157

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South Central Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110-8200

RE: Civil Action No. 1:15-cv-00291-WWC: Sinkhole Remediation – Notification of Completion

To Plaintiffs, Civil Action No. 1:15-cv-00291-WWC:

This letter is a formal notification for Capital Region Water's completion of the Sinkhole Remediation as outlined under Paragraph V(G)(31)(b) of the partial Consent Decree lodged February 10, 2015:

*b. Sinkhole Repair. CRW shall investigate all sinkholes reported as of the Date of Lodging of this Consent Decree and shall remediate those sinkholes caused by the structural deterioration of the Collection or Conveyance System, including laterals, within three (3) years of the Date of Lodging. CRW shall: (1) provide Plaintiffs a list of all sinkholes reported as of the Date of Lodging, (2) conduct an investigation of each such sinkhole to identify those sinkholes caused by the structural deterioration of the Collection or Conveyance Systems, including laterals, (3) determine the remediation work necessary to repair those sinkholes and their underlying causes, and (4) define a schedule under which all remediation work will be completed within three (3) years of the Date of Lodging.*

In a letter report, dated February 9, 2017, CRW summarizes the fulfillment of the Sinkhole Remediation of the one-hundred sixteen (116) sinkholes at the date of lodging. At the time, CRW reported that a remaining four (4) sinkholes had been stabilized and sewer mains had been identified for future trenchless pipe lining projects.

As directed by EPA in a letter dated April 5, 2018, CRW continued to report on compliance with this requirement of the PCD in our Annual NMC Updates and Semi-Annual Reports. We reported on the



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outstanding sinkhole work in the 2018 NMC Update/Semi-Annual Report (8/10/2018 and 9/30/2018). In the 2019 NMC Update (8/10/2019), the language was redlined, and we marked the activity complete. Please see the table below for the detailed report on the four (4) sinkholes fully remediated with the completion of the trenchless lining projects in late spring of 2019.

| Asset ID | Status | Location | Cause | Completion Date | Work Order |
|---|---|---|---|---|---|
| **SH-000009** | Repaired | 646 Buttonwood St. | Sewer – SSP-004814 | 5/9/2019 | WO5934, Repair Sewer Pipe, finished date 05/09/2019, 176' of CIPP. |
| **SH-000025** | Repaired | 1525 Sycamore St. | Sewer – SSP-000821 | 5/9/[redacted]19 | WO7969, Repair Sewer Pipe, finished date 05/09/2019, 192' of CIPP. |
| **SH-000054** | Repaired | 1414 Sycamore St. | Sewer – SSP-004020 | 4/30/2019 | WO11938, Repair Sewer Pipe, finished date 04/30/2019, 384' of CIPP. |
| **SH-000084** | Repaired | 2939 Croyden Rd. | Sewer – SSP-001758 | 4/23/2019 | WO8247, Repair Sewer Pipe, finished date 04/23/2019, spot liner noted. |

Furthermore, Capital Region Water continues to investigate and repair sinkholes as they appear and has developed a comprehensive sinkhole investigation and maintenance process. The comprehensive sinkhole process is documented in a standard operating procedure (SOP), as well as the Operations and Maintenance Manual, Wastewater Division, Section (4)(9). The SOP includes mechanisms of internal communications, investigation procedures, determination, documentation, oversight of the computerized maintenance management system (CMMS), reporting, and effective criteria.

Please contact me directly to discuss any question or concerns you may have.

Sincerely yours,

Claire Maulhardt

Claire Maulhardt, P.L.A.
City Beautiful $H_2O$ Program Manager

cc: Charlotte Katzenmoyer, CEO, CRW
Dave Stewart, P.E., BCEE, CRW
Fredric Andes, Esq.
John Aldrich, P.E., D.WRE, CDM Smith

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CAPITAL REGION WATER
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EXECUTIVE OFFICE
MAY 11 2020

U.S. DEPARTMENT OF JUSTICE
ENVIRONMENT AND NATURAL
RESOURCES DIVISION

REFERRED
MAIL REFERRAL UNIT
MAY - 6 2020
READER #3

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
601 D Street NW
Washington, D.C. 20004
Re: DOJ No. 90-5-1-1-10157

For questions or to report problems with your water or sewer service call 1-888-510-0606 or find us online at capitalregionwater.com