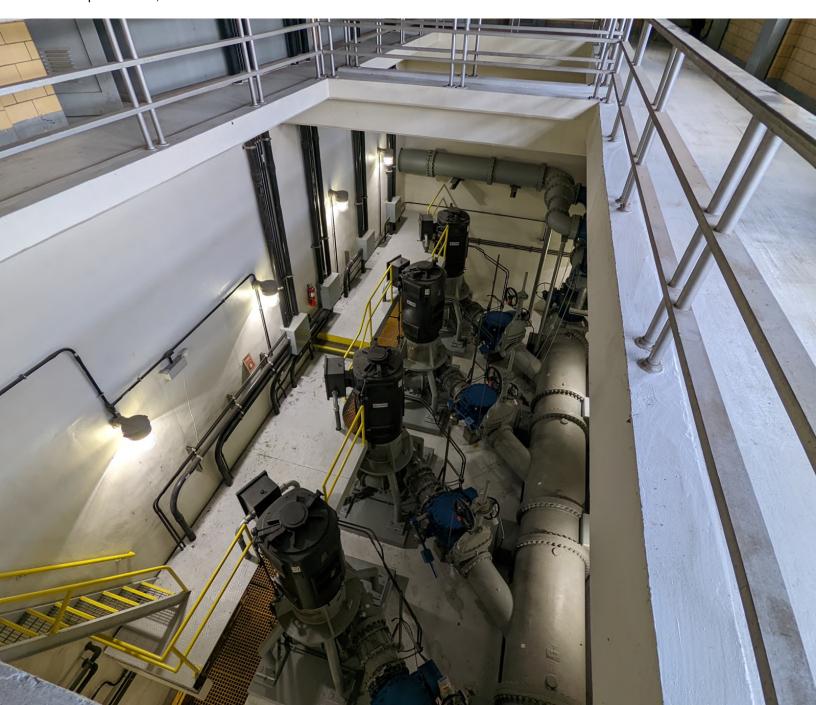


Consulting Engineer's Annual Report – Wastewater System

Capital Region Water

September 30, 2022



Consulting Engineer's Annual Report

Wastewater System

FINAL

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Appendix A – Wastewater System Service Area Map

Acronyms and Abbreviations

AWTF Advanced Wastewater Treatment Facility

BOD Biochemical Oxygen Demand

CAMP CSO Activation Monitoring Pilot

CEAR Consulting Engineer's Annual Report

CIP Capital Improvement Plan

CRW Capital Region Water

CSO Combined Sewer Overflow

FY Fiscal Year

MGD Million Gallons per Day

Mg/L Milligrams per Liter

NMC Nine Minimum Controls

NPDES National Pollutant Discharge Elimination System

O&M Operation and Maintenance

OMM Operation & Maintenance Manual

PADEP Pennsylvania Department of Environmental Protection

PPC Preparedness, Prevention, and Contingency

PRP Pollution Reduction Plan

SSO Sanitary Sewer Overflow

TMDL Total Maximum Daily Load

VFD Variable Frequency Drive

1 Introduction

Arcadis U.S., Inc. (Arcadis) prepared this Wastewater System Consulting Engineer's Annual Report (CEAR) for Capital Region Water (CRW) as required by Section 7.11 of the Trust Indenture between CRW and The Bank of New York Mellon Trust Company, N.A. originally dated May 1, 2017. This CEAR is being submitted to comply with the following requirements, as outlined in the Indenture:

Section 7.11:

"It shall be the duty of the Consulting Engineers, in addition to the other duties prescribed elsewhere in this Indenture, to prepare and file with the Authority and with the Trustee on or before 90 days prior to the beginning of each Fiscal Year hereafter, a report setting forth the following:

- a. Their advice and recommendations as to the proper maintenance and repair of the operating and wastewater delivery infrastructure of the Sewer System during the next Fiscal Year;
- b. Their advice and recommendations as to the Capital Additions that should be made during the next Fiscal Year and their estimate of the amounts of money necessary for such purpose; and
- c. Their finding whether the operating and wastewater delivery infrastructure of the Sewer System have been maintained in good repair and sound operating condition and their estimate of the amount, if any, required to place such operating and wastewater delivery infrastructure in such condition and the details of such expenditures and the approximate time required therefor."

CRW's fiscal year runs from January 1 through December 31. The wastewater system is owned and operated by CRW and includes an Advanced Wastewater Treatment Facility (AWTF), a conveyance system, and wastewater and stormwater collection systems located within the City of Harrisburg (City) limits. Overall, the wastewater system includes approximately 36 miles of sanitary sewers, 40 miles of stormwater sewers, and 101 miles of combined sanitary and stormwater sewers.

The wastewater collection system services customers located within the City. The conveyance and treatment systems provide wastewater conveyance and treatment services to the City and Suburban wholesale customers. Suburban wholesale customers are located in Susquehanna Township, Lower Paxton Township, Swatara Township, Paxtang Borough, Penbrook Borough, and Steelton Borough.

1.1 Report Methodology and Limitations

In preparing this CEAR, Arcadis reviewed existing records and documents prepared by or on behalf of CRW to understand, assess, and report on the technical information contained therein as it relates to the CEAR. The major relevant documents provided by CRW and reviewed as part of the CEAR include, but are not necessarily limited to the following:

- Chapter 94 Municipal Wasteload Management Report and Semi-Annual Report on Consent Decree Implementation, March 2021.
- Design and Operational Parameters Associated with the Wastewater System
- Monthly Treatment Plant Operating Data (2021, and January 2022 through June 2022).
- Historic Wastewater System Expenses (FY 2021)

- Budgeted FY 2022 Wastewater System Expenses.
- Memorandum from HRG to CRW entitled "Arsenal Boulevard Area Sewer Improvements Phase 1
 Value Engineering Review", dated September 10, 2021.
- Technical Memorandums provided by KCI, Phase 5 CCTV, September 2021.

In addition, on August 16, 2022, Arcadis conducted limited visual site inspections of the following components of the Wastewater System:

- Advanced Wastewater Treatment Facility
- Front Street Pump Station
- Spring Creek Pump Station
- City Island North Pump Station
- City Island South Pump Station
- Market Street Pump Station

The review also included discussions with representatives of CRW and performance comparisons to other comparable wastewater systems and related industries.

This CEAR summarizes the findings of the visual inspections at the time they were conducted, and the findings of the data reviewed and discussions with CRW up to the date of the issuance of the CEAR. Changed conditions occurring or becoming known after such date could affect the material presented and the conclusions reached herein to the extent of such changes.

Arcadis has not independently verified the accuracy of the information provided by CRW and others. However, it is believed such sources are reliable and the information obtained to be appropriate for the analysis undertaken and the conclusions reached herein. In addition, the scope did not include review of any pending or threatened litigation against CRW, however CRW has stated that there is pending litigation (a claim for approximately \$1M as a delay claim for the Front Street Pump Station Improvements Project which is currently in the resolution process under the terms of the contract) which at this time it is not anticipated to have a material impact on its wastewater operations.

In completing this CEAR for CRW, Arcadis is not serving in the role of a "municipal advisor" under the regulations of the Securities and Exchange Commission. As such, Arcadis is not recommending any action regarding municipal financial products or the issuance of municipal securities; and is not acting as a registered municipal advisor to CRW and does not owe a fiduciary duty to CRW pursuant to Section 15B of the Securities Exchange Act of 1934, as amended by the Dodd-Frank Wall Street Reform and Consumer Protection Act, with respect to the information and material prepared in connection with this CEAR. CRW should discuss any information and material prepared in connection with this CEAR with any and all internal and external financial and other advisors that they may deem appropriate before acting on this information and material.

2 Wastewater system Management

2.1 Overview of the Wastewater System

CRW is a municipal authority that owns and operates an Advanced Wastewater Treatment Facility (AWTF), a conveyance system, and wastewater and stormwater collection system within City limits. The AWTF employs biological nutrient removal technology in an activated sludge plant to achieve nitrogen and ammonia requirements. Overall, the wastewater system includes approximately separate sanitary sewers and stormwater sewers, as well as combined sanitary and stormwater sewers. A summary of the major wastewater system facilities is provided in **Table 2-1**. The wastewater collection system provides service to customers located within the City. The conveyance and treatment systems provide wastewater conveyance and treatment services to City and Suburban wholesale customers. Suburban wholesale customers are located in Susquehanna Township, Lower Paxton Township, Swatara Township, Paxtang Borough, Penbrook Borough, and Steelton Borough. The Suburban wholesale customers account for approximately 50% of the revenues of the wastewater system.

Table 2-1: Summary of Major Wastewater and Stormwater System Facilities

Facility	Description	Design Peak Capacity	2021 Average Flow	2021 Peak Flow
Advanced Wastewater Treatment Facility	High Purity Oxygen Activated Sludge Plant	45.0 MGD	20.8 MGD	29.0MGD ¹
Front Street Pump Station	Pump Station	43.2 MGD	13.9 MGD	61.9 MGD ²
Spring Creek Pump Station	Pump Station	28.9 MGD	5.50 MGD	22.0 MGD
City Island North Pump Station	Pump Station	0.432 MGD	0.006 MGD	0.014 MGD ³
City Island South Pump Station	Pump Station	0.432 MGD		Total
Market Street Pump Station	Pump Station	Unavailable	Unavailable	Unavailable

¹Maximum monthly flow, which occurred in September 2021.

A map of the wastewater system's infrastructure, including stormwater pipe, interceptor sewers, force mains, gravity sewer mains, and pump stations, is shown in **Figure 2-1**.

²From January to June 2021 Front St. Pump Station peak flow was pumped by a temporary bypass pumping system while the pump station is out of service for improvements. This was not pumped by the station pumps.

³2020 City Island flows based on 2007 reported flows. Actual flows are not available.

Sources: Chapter 94 Municipal Wasteload Management Report for Calendar Year 2021, and Semi-Annual Report on Consent Decree Implementation for July 1, 2021 to December 31, 2021, dated March 2022. Wastewater Division Monthly Report, dated December 2020

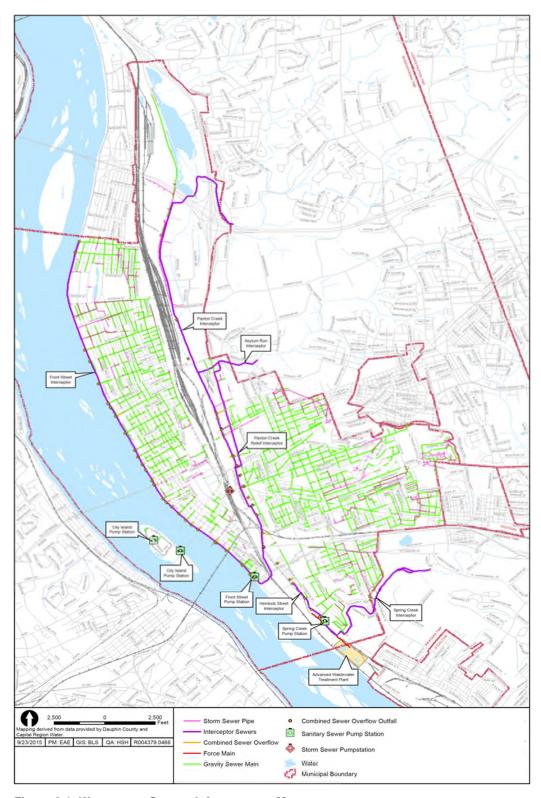


Figure 2-1: Wastewater System Infrastructure Map

2.2 Wastewater System Description

2.2.1 Wastewater Treatment

The AWTF is a 45 million gallon per day (MGD) capacity, high purity, oxygen activated sludge plant. The plant consists of preliminary treatment, including vortex grit removal, followed by primary clarifiers, high purity oxygen secondary treatment, secondary clarifiers, and chlorine disinfection. In 2016 the plant was upgraded to implement biological nutrient removal. This upgrade consisted of new side-stream treatment, 4.5-million-gallon biological reactor tankage and numerous associated appurtenances to upgrade treatment capabilities for nitrogen removal.

2.2.2 Wastewater Pump Stations

The Front Street Sewage Pump Station, located at 830 South Front Street, receives combined sewage flows from the 42-inch by 42-inch Front Street interceptor and 60-inch diameter Paxton Creek interceptor. The Pump Station was constructed in the late 1950s. Annual average daily flow was 14 MGD with peak daily flow of 61.9 MGD being recorded in 2021. The Pump Station conveys flow approximately 6,100-feet to the AWTF through a 48-inch diameter cast iron force main joined by the contribution of Spring Creek Pump Station into the force main approximately 2,000-feet upstream of the AWTF. The Front Street Pump Station underwent a rehabilitation project to replace the aging infrastructure at the station and increased peak capacity to 60 MGD. The rehabilitation project was awarded in September 2018 with a total cost of \$12.8M. Construction has been completed and the pump station has been in service since July 2021.

The Spring Creek Pump Station was originally constructed in 1959, and it currently conveys average daily flows of 5.50 MGD to the AWTF with a peak design capacity of 28.9 MGD. The pump station is located just southwest of the intersection of South Cameron Street and Magnolia Street and serves the southern portions of the wastewater collection system. Wastewater enters the station through a 24-inch diameter cast iron interceptor on the east side of the station and a 27-inch diameter reinforced concrete pipe interceptor on the south side. The station is equipped with three sewage pumps that discharge through a 24-inch diameter cast iron line, which ultimately connects to the 48-inch diameter force main from the Front Street Pump Station. The Spring Creek Pump Station also has a permitted combined sewer overflow (CSO) chamber that relieves the system during high flow events. The Spring Creek Pump Station is nearing the end of its useful life, and CRW has begun evaluating potential improvement options for how to implements improvements to the station. CRW is waiting to determine capacity and screening requirements for upgrading or replacement/relocation of the Spring Creek Pump Station once they have a better idea of how the Front Street PS upgrade affects flow management of the system.

There are also two small pump stations (City Island North Pump Station and City Island South Pump Station) that convey wastewater flow from City Island to the Front Street Interceptor and eventually to the Front Street Pump Station. CRW also operates the Market Street Pump Station, which conveys stormwater from a railroad underpass to Paxton Creek.

2.2.3 Wastewater Conveyance

CRW operates and maintains 59 CSO regulator structures located along the Front Street, Paxton Creek, and Hemlock Street interceptor sewers, which ultimately direct combined wastewater (sanitary wastewater and stormwater) to the AWTF. During dry weather conditions, the CSO regulator structures divert all of the combined wastewater from the trunk sewer lines to the interceptor sewers. During wet weather, the rate and volume of the sanitary and stormwater flow from the system of collector sewers increases significantly and can exceed the capacity of the downstream interceptor sewers and the AWTF. When this occurs, the CSO regulator structures (oftentimes called diversion structures) divert a controlled volume of flow to the interceptor, while untreated excess combined wastewater is discharged to receiving waters. The receiving waters are the Susquehanna River for regulator structures along the Front Street interceptor and Paxton Creek (a tributary of the Susquehanna) for regulators along the Paxton Creek and Hemlock Street interceptors.

There are also CSO outfalls at the Front Street Pump Station and the Spring Creek Pump Station. These are permitted emergency outfalls (CSO-002 and CSO-003) that only activate during a mechanical failure of the pump stations or if the station capacities are exceeded during large storms. Each regulator has a dedicated outfall, except in one case where two regulators serve a common outfall. Therefore, there are a total of 61 outfalls (including those from the pump stations) in the system.

In addition, the wastewater conveyance system also includes approximately 36 miles of sanitary sewers, 40 miles of stormwater sewers, and 101 miles of combined sanitary and stormwater sewers.

2.3 Management and Staffing

CRW is governed by a five-member Board of Directors. A management team headed by the Chief Executive Officer is responsible for technical and administrative operations of CRW, as well as the implementation of programs, policies, and procedures, and the execution of contracts upon approval by the Board. In addition to providing drinking water services, CRW also provides wastewater services. CRW operates as one entity; however, CRW separately tracks and records the provision of services associated with each of the utilities that it manages and operates.

CRW's organizational chart is made up of seven departments as well as an Executive Team. The seven departments are as follows: Finance, Engineering, Operations, Shared Services, Strategic Initiatives, Human Resources, and Risk and Safety. An overview of the current organization structure of CRW is shown in **Figure 2-2**.

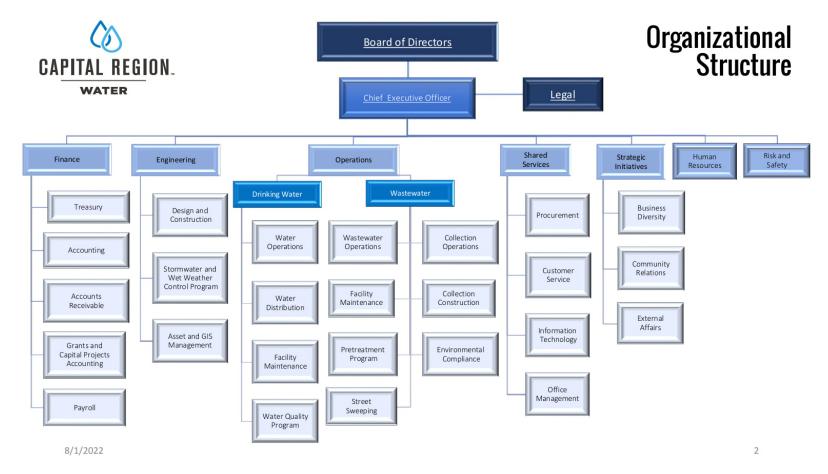


Figure 2-2: CRW Management Level Organizational Chart

2.3.1 Organizational Structure Description

The Drinking Water and Wastewater Departments are responsible for operation and maintenance (O&M) of facilities, permit compliance, tracking and reporting, energy management, monitoring, long-term planning, repair and construction, and assistance in budget preparation and tracking. The Wastewater Department includes plans for 57 positions, with 53 positions filled as of August 2022. The Wastewater Operations organizational chart is provided in **Figure 2-3**.

The Shared Services Department provides office management, information technology, customer service, and procurement services. The Engineering Department provides engineering support, project coordination, GIS coordination, wet weather coordination, and asset management services. The services currently provided by the Finance Department include accounting, billing and collections, customer service, and payroll. The Executive Team provides legal services. Human Resources was previously part of the Executive Team but is now a separate department reporting to the Executive Team. A Risk and Safety department was created by moving it out from under the Human Resources department. A Strategic Initiatives Department provides diversity and inclusion as well as community relations and other external affairs.

It is understood that CRW plans to staff the Shared Services Department, Engineering Department, Finance Department, Strategic Initiatives, Human Resources, Risk and Safety, and Executive Team with a total of 53 positions (19 for Shared Services, 9 for Engineering, 9 for Finance, 5 for Strategic Initiatives, 2 for Human Resources, 1 for Risk and Safety, and 8 for Executive), and as of August 2022, 50 of the 53 positions have been filled. Personnel expenses associated with these departments are allocated to each of the utilities based on budgeted time allocated to each of the services.

In summary, CRW's FY 2022 Wastewater System budget includes estimated costs associated with the current and planned employees dedicated to the Wastewater System and the Wastewater System's share of costs associated with the planned positions under the Shared Services, Engineering, Strategic Initiatives, Finance Department, Human Resources, and Risk and Safety Departments as well as the Executive Team, which all provide support to CRW's water and wastewater utilities. These employees are all employees of CRW, with the majority belonging to a collective bargaining unit.

The organizational structure of CRW provides strong opportunities for economies of scale through the sharing of shared services, engineering, finance, and executive services between the water and wastewater utilities. The structure is generally consistent with similar-sized, combined utilities and it appears that all required Wastewater System functions of CRW are adequately staffed and without excessive vacancies.

Due to COVID-19, CRW has maintained adjusted staffing. The Maintenance and Field crews have each split into two teams and are isolated from each other to prevent cross-exposure. Teams continue to be split to limit contact with each other and start times were adjusted. The operations staff continue to working normally except 8-hour employees were changed to 12-hour shifts to limit contact between operations teams. The teams adjusted their end of shift updates to limit contact. This re-structuring has worked well for CRW and made it permanent. The in-house lab staff is back into one group. If an exposure occurs, CRW plans to outsource regulatory required testing. There was a reduction in extra process control testing but all required testing and significant process control testing is being completed.

As case rates change, management is adjusting required protocols as necessary to keep safety as the main priority. Despite smaller crews, the maintenance department was able to continue making repairs as needed and was able to keep up with preventative maintenance work orders. Field Maintenance numbers such as feet televised and cleaned is down from normal due to the smaller crews. Hauled-in waste program changes were made permanent due to the success throughout the pandemic. This includes haulers collecting their own samples for analysis and paperwork is left in a drop box to limit contact between drivers and CRW operations staff.

CRW began street sweeping responsibilities on August 3, 2020. The program was initially delayed due to equipment arrivals and training on the new equipment. CRW had purchased three street sweepers and operate two sweepers daily. Sweepings are disposed in the grit lagoon at the plant for dewatering. Once dry, the sweepings are handled at the Harrisburg Incinerator. In 2021, citizen complaints have decreased dramatically due to the program. During heavy rain events, street sweeping is cancelled, and staff perform checks of storm inlets around the city to make sure they are not blinded by trash or debris.

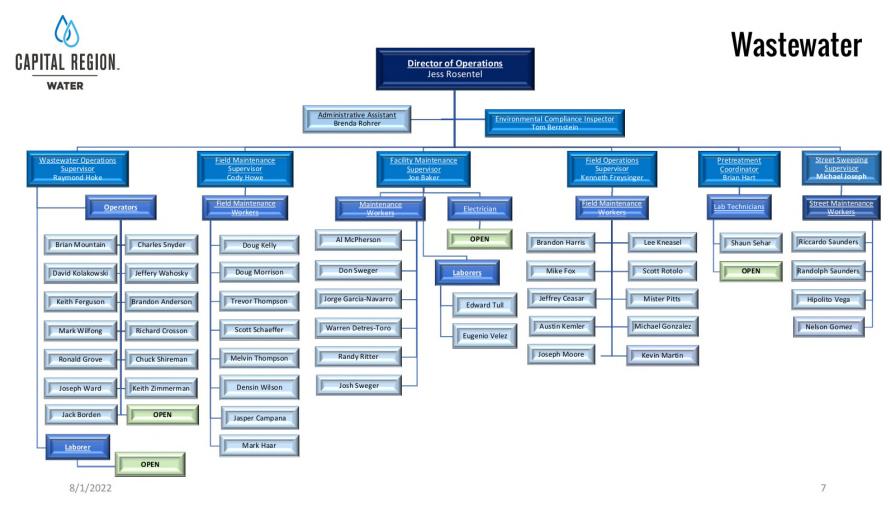


Figure 2-3: Wastewater Operations Division Organizational Chart

3 Wastewater System Performance

3.1 Service Area

The wastewater system provides service to City retail customers and suburban community wholesale customers. The suburban communities account for approximately half of the revenues of the conveyance and treatment systems and include Susquehanna Township, Lower Paxton Township, Swatara Township, Paxtang Borough, Penbrook Borough, and Steelton Borough, all of which are located in Dauphin County. A map of the wastewater system's service area is included in Appendix A.

3.2 Customer Base

CRW maintains approximately 17,000 active connections within the City. Suburban communities are billed on a wholesale basis with their allocation based on an estimate of individual account data for customers located in these communities. Some suburban customers are billed based on metered water consumption, while others are billed based on the estimated number of equivalent dwelling units within their customer base. For 2021 billing purposes, one equivalent dwelling unit has been assumed to equal 45,000 gallons of annual water consumption. During FY 2021, suburban communities were billed for approximately 2.2 billion gallons of wastewater flow.

The number of customers and billed wastewater flow by class for customers located within the City are shown in **Table 3-1**. The total billed wastewater flow for Suburban communities is also shown in the table.

Table 3-1: Customer Information

		Billed Wastewater
Description	Accounts	Flow (1,000 gal.)
Description	Accounts	(1,000 gai.)
City of Harrisburg:		
Residential	14,577	753,575
Commercial	1,696	441,641
Industrial	23	61,254
Public\Institutional	75	65,471
Total	16,371	1,321,941
Suburban Communities:		
Penbrook Borough	n/a	68,585
Paxtang Borough	n/a	35,471
Swatara Township	n/a	466,128
Lower Paxton Township	n/a	847,336
Susquehanna Township	n/a	639,050
Steelton Borough	n/a	123,606
Total	n/a	2,180,176
Combined Total	n/a	3,502,117

Source: FY 2021 customer and billing data provided by CRW.

3.3 Regulation and Compliance

CRW's AWTF is permitted to discharge to the Susquehanna River under National Pollutant Discharge Elimination System (NPDES) Permit No. PA0027197. CRW's permit renewal application was submitted in July 2014 and is currently under review. PA DEP has stated that they are waiting for a finalized Modified Consent Decree with EPA and DOJ prior to completing the permit review. The information in section 3.3.1 and 3.3.2 was obtained from the Chapter 94 Municipal Wasteload Management Report for Calendar Year 2021, and Semi-Annual Report on Consent Decree Implementation for July 1, 2021 to December 31, 2021, dated March 2022.

3.3.1 Operation and Performance

In FY 2021, the average annual wastewater flow received at the AWTF was 20.8 MGD, with the highest month being September with an average flow of 29.0 MGD, and the maximum 3-month average of 25.0 MGD during July to September 2021. The permitted design hydraulic capacity flow for the AWTF is 45.0 MGD. No hydraulic overloads were recorded in 2021, as the monthly average flow at the AWTF did not exceed the design capacity of 45.0 MGD in any month during the year. In addition, the average flow at the AWTF in FY 2022 (through June), was approximately 22.8 MGD and the highest average flow on a per month basis occurred in May and was 28.6 MGD. Based on flow projections for the City, and contributing municipalities, no hydraulic overload conditions are projected through FY 2026, as the annual average flow in that year is projected to be 23.5 MGD.

In FY 2021, annual average biochemical oxygen demand (BOD) loading was 33,303 pounds per day with a maximum one month loading of 50,433 pounds per day. The permitted average daily organic loading for the AWTF is 68,257 pounds BOD per day. No organic overloads were recorded in 2021 and based on organic loading projections, no overload conditions are expected through 2026, as the annual average organic loading is projected to be 26,764 pounds per day. Over the past five years, the average organic waste strength of the sewerage received at the AWTF has averaged at 202 milligrams per liter (mg/L). The organic waste strength of the sewerage is not expected to increase significantly over the next five years.

With the completion of the AWTF Nutrient Removal Upgrade (BNR) project in 2016, CRW has realized a significant decrease in the concentration of nitrogen in the effluent from the AWTF. For example, in 2015, the average concentration of nitrogen as sampled from effluent was 22.4 mg/L; in FY 2020 the average concentration of nitrogen in the effluent was 7.0 mg/L, in FY 2021 the average concentration of nitrogen in the effluent was 6.0 mg/L, and in FY 2022 (January -June) the average concentration of nitrogen in the effluent was 5.0 mg/L.

3.3.2 Permit Exceedances

CRW did not exceed any of its NPDES permit requirements in 2021.

3.3.3 Sewer Overflow and Bypass Events

There were 44 secondary bypass events during 2021. A secondary bypass event is where there is excess wastewater flow received at the secondary treatment train above 45.0 MGD, causing the wastewater flow to bypass secondary treatment. The secondary bypass events now include the AWTF influent flow as well as the Secondary Treatment influent flow. Until the recent AWTF upgrade completion there was not adequate flow control or measurement to provide actual flow data. CRW now has the ability to better control, monitor, and report flows into the facility and through the secondary treatment train versus secondary bypass. Twenty of the reported bypass events triggered the bypass gate to open but with no flow bypassed. Two of the bypass events exceeded 12 hours in duration, with the longest bypass event lasting longer than 14 hours.

CRW has a combined sanitary and stormwater system, which conveys wastewater and stormwater runoff during wet weather periods. Regulators and diversion chambers divert excess flow to Paxton Creek or Susquehanna River during wet weather events. Wet weather events occur when the combined flow exceeds the dry weather peak flow capacity. CRW's discharge permit authorizes discharges from regulators and diversion chambers; however, it does not authorize overflows from sanitary sewers or discharges from other than identified combined sewer regulators and diversion chambers. A summary of the SSO events and combined sewer unauthorized discharges during the 2021 reporting period are listed in Table 3-2.

Table 3-2: Sanitary Sewer Overflows and Unauthorized Discharges (2021)

Date	Location	SSO or UD	Issue	Duration (Hrs.)
2/8/21	228 S. 14 th St.	UD	Backup in residence due to lateral not reinstated during main replacement	
2/9/21	436 Crescent St.	UD	Backup in residence due to lateral blockage from water main installation	10.5
4/6/21	1147 Rolleston St.	SSO	Backup in residence due to main blockage	2
6/22/21	4000 Industrial Rd.	SSO	Grease blockage in main, two manholes overtopping	1.5
9/4/21	Spring Creek Interceptor SSMH-000390 & SSMH- 000391	SSO	Tropical Storm Ida 5.69 inches of rainfall caused surcharging and flooding	
11/1/21	2490 Ruby Rd	UD	Grease/grit blockage in main	1

Date	Location	SSO or UD	Issue	Duration (Hrs.)
11/22/21	2260 & 2234 Kensington St.	UD	Grease blockage in main	2

Source: Chapter 94 Municipal Wasteload Management Report for Calendar Year 2021, and Semi-Annual Report on Consent Decree Implementation for July 1, 2021 to December 31, 2021, March 2022.

3.3.4 Partial Consent Decree

In August 2015, CRW entered into a partial Consent Decree with the Department of Justice, the U.S. Environmental Protection Agency, and PADEP concerning the operation of its collection system, pump stations, and AWTF. The Consent Decree requires CRW to complete a Long-Term Control Plan for its combined sewer system, update the Combined Sewer System Operations and Maintenance Manual and Nine Minimum controls, obtain a MS4 permit and establish a Stormwater Management Program, and implement early action projects. In 2021, CRW fulfilled its partial Consent Decree requirements for deadlines due during this reporting period, including the following:

- Completion of its Annual Update of the Nine Minimum Controls plan
- Completion of its Semi-Annual Report on Consent Decree Implementation
- Completion of a Chapter 94 Annual Wasteload Management Report
- Preparation of its updated Long-Term Control Plan (City Beautiful H₂0 Program Plan) in March 2018.
 The following have been completed in support of the LTCP:
 - Completion of five green stormwater infrastructure projects.
 - Completed the CSO/wet weather alternatives evaluation.
 - Performed a Financial Capabilities Analysis (FCA) according to U.S. EPA protocol. CRW is currently working on a revised FCA in response to EPA comments.
 - Conducted community stakeholder workshops.
 - CRW is continuing to coordinate with USDOJ/USEPA/PADEP on the draft proposed modification to the partial Consent Decree.

CRW has met compliance dates for the reporting period January 1, 2022 to June 30, 2022 corresponding to Semi-Annual Report on Consent Decree Implementation and Chapter 94 Annual Wasteload Management Report.

CRW completed upgrades to its AWTF in 2016 with biological nutrient removal in order to comply with the Chesapeake Bay Tributary Strategy and meet new NPDES permit discharge requirements. This \$50 million project at the AWTF consisted of adding biological nutrient removal technology to the existing processes to achieve nitrogen and ammonia removal requirements associated with the new NPDES discharge permit. With the project now complete, CRW has the ability to generate nutrient credits. Between August 2021 and February 2022 CRW has operated a full-scale trial with a free alternative supplemental carbon source for the denitrification process to reduce the need for chemical purchases. The program was a success and CRW is able to generate significant non-rate revenue through the sale of nitrogen credits. A buyer was found for the credits and CRW is expecting to generate 75,000 credits

and plan to execute a 3-year agreement for credits generated in 2022 through 2024. It is currently pending authorization from the CRW Board.

3.3.5 Wet Weather Program Accomplishments

CRW's progress during FY 2021 and FY 2022 under its Wet Weather Program included the following accomplishments:

- Submitted the Nine Minimum Controls Plan Update on August 10, 2021.
- Continued to provide updates and review to the Operations and Maintenance Manual (OMM) to implement improvements in the 2021 Annual Update.
- Continued to expand the development of the sewer maintenance management system, including the GIS and Cityworks systems, including development of training protocol for all Cityworks users and is incorporating additional reporting related to maintenance and regulatory activities within the sewer system from the Cityworks data. CRW continues to update their GIS database, and recent additions include incorporating capital projects.
- CRW continued to implement their CSO hotline with the status of CSO events and continued to conduct public outreach, education, and notification programs.
- CRW received a new MS4 permit in 2020. CRW partnered with Lower Paxton Township and Susquehanna Township to prepare a Joint Pollutant Reduction Plan which was approved by PADEP in 2020. Minimum control measure implementation continued through 2021 and CRW submitted the first annual MS4 report.
- Continued to monitor 8 precipitation gauging sites as well as gauge adjusted radar rainfall, 4 flow meters monitoring flow from the satellite communities, and 8 combined sewer interceptor flow meters.
- Continued maintenance and inspections of Green Stormwater Infrastructure (GSI) Projects at the following sites: Cloverly Heights, Penn & Sayford, Royal Terrace, Summit Terrace, and 3rd Street in Harrisburg. Completed construction of two additional GSI sites at 4th and Dauphin Park and South Allison Hill Green Street.

3.3.6 Nine Minimum Controls Plan

CRW developed a detailed approach to achieve future compliance with each of the Nine Minimum Controls (NMCs), which was submitted in the August 2015 NMC Plan and has been updated annually. In many cases, the compliance measures have already been implemented, such as daily CSO regulator inspections. In other areas, additional information is required to implement some of the NMCs, and CRW has undertaken efforts necessary to collect the data. Efforts related to the NMC Plan that have been completed include the following:

- Prepared the 2021 NMC Plan Update
- Identified critical trunk sewers and completed manhole inspection data review
- · Refined the sewershed and catchment delineations using the manhole investigation data
- Updated the GIS system with collection system manhole investigation and rapid assessment data

- Advanced CRW's risk-based asset condition/criticality rating system to be used to establish priorities for CCTV inspections and subsequent cleaning and repair projects.
- Completed an internal force main inspection and found no critical deficiencies. Routine force main monitoring continues.
- Continued to implement and optimize Cityworks for the management of complaints and service requests and operations and maintenance of AWTF and pumping stations
- Continued to perform daily regulator inspections at each regulator

The following efforts are ongoing by CRW related to its NMC Plan:

Conduct proper operation and regulator maintenance of the conveyance and collection system:

- Initiation of a comprehensive systemwide CCTV inspection and assessment of the collection system
- Identification of key equipment purchases
- Allocating funds to address Priority 1 projects within the next five years
- · Continued to provide training to staff
- Continued to perform daily regulator inspections
- Address potential river intrusion during design of future regulator improvement projects under baseline City Beautiful H₂O Program Plan (CBH2OPP) implementation
- Continued to implement practices outlined in the OMM
- Continued with an ongoing inlet cleaning and inspection program
- Continued to inspect and maintain pump stations as outlined in the OMM
- Continued to optimize Cityworks for data management and maintenance problems
- Continued to investigate and repair sinkholes in accordance with the OMM

Maximize use of storage in the collection systems:

- Continuing to prioritize areas of the collection system for remedial repair based on an overall schedule for cleaning, rehabilitation, and replacement as part of the core risk analysis in the asset management program and LTCP plan implementation.
- Continuing to clean interceptors every 5 years following rehabilitation of each interceptor.
- Implement a decentralized green-grey stormwater controls within collection system as defined under the CBH2OPP to provide storage to reduce CSOs and unauthorized releases (e.g., basement backups) within the collection system

Maximize flow to the AWTF:

- Continued to operate the system in accordance with the OMM
- Developed H&H Model to assess system capacity; calibrated H&H model; characterized existing system performance
- Implement CSO regulator/outfall enhancements recommended as a baseline control under the LTCP
- Conducted flow monitoring to characterize wet weather inflows from suburban communities

- Prepared Capacity Assessment Report; no significant I/I reductions recommended
- Evaluated the AWTF flows for the preparation of the Chapter 94 Report
- Completion of upgrades to the Front Street Pumping Station

Eliminate dry weather overflows:

- Reported dry weather overflows in accordance with regulatory guidelines
- Implement weir height adjustments for the Baseline Level of Control
- Removed blockages and modified hydrant flushing operations to correct dry weather overflows.
- · Conducted daily inspections as detailed in the OMM
- Removed waste material that accumulated on the stream banks.

Operate and maintain the combined sewer system to control solid and floatable materials:

Removed waste material that accumulated on the stream banks

Implement public notification procedures set forth in the NMC plan:

- Installed temporary signs at each CSO outfall and public stream access point that notify and alert the public.
- Continued to develop a public outreach and notification program as described in the NMC Plan
- Continued to increase public involvement activities, including monthly trash clean-ups, and presentations at community events.

Utilize a phased approach to characterize CSO impacts and control efficacy:

- Employed visual inspections of regulator and outfalls daily
- Continue to monitor rainfall at rain gauges
- Use calibrated H&H model to quantify and characterize CSOs in semi-annual reports

Evaluate the efficacy of the NMC Plan:

Updated the NMC Plan

Submit MS4 Individual Permit Application with a Stormwater Management Plan:

- Continued implementing a TMDL Strategy in collaboration with two neighboring municipalities
- Continued with field investigations to identify outfalls and update the map of the MS4 system
- Continued to conduct stormwater management plan reviews through coordination with the City of Harrisburg
- Implemented rules and regulations for stormwater management
- Pursuing an MOU with Dauphin County Conservation District and the City of Harrisburg (currently functioning under an existing MOU with City of Harrisburg). MOU is still pending.

3.3.7 Operations and Maintenance Manual

CRW reviewed ongoing maintenance and operation efforts and developed improved practices for compilation in the new Operations and Maintenance Manual (OMM). The OMM defines the critical equipment and facilities for the AWTF and collection/conveyance systems. The OMM also includes detailed procedures, complete with checklists, for the following system components: CSO regulators, outfalls and backflow prevention gates, pump stations, interceptors, force mains, collection system and manholes, and inlets and catch basins. The OMM also outlines emergency procedures, citizen complaint tracking, sinkhole remediation, and education programs. The OMM document was originally submitted on August 10, 2015, and the latest version (V6.0) was released in March 2022.

3.3.8 Data Management Systems

CRW has developed a Cityworks[™] data management system for their sewer system. Cityworks was implemented on October 20, 2015. This software is the recordkeeping tool for maintenance activities and will assist in reporting requirements of the partial Consent Decree. From January to December 2021 the following items have been documented in Cityworks for sewer system maintenance and inspection activities and reported in the Semi-annual Report on Consent Decree Implementation (September 2021 and March 2022):

- 893 inlets were cleaned and 135 were repaired
- 77 sinkholes were investigated or repaired
- 4,150 work orders completed, including pipe flushing, cleaning out manholes and repairing manholes
- 93,984 linear feet of collection system sewer were cleaned and televised
- 1,348 hotspot inspections
- 20,996 daily CSO inspections

3.3.9 Industrial Pre-Treatment

CRW maintains an Industrial Pre-Treatment Program to ensure that industrial users comply with federal state, and local pre-treatment program effluent discharge limitations and regulations. Industrial user compliance eliminates interference or possible damage to the conveyance and treatment system, untreated waste from passing through the AWTF to the receiving stream, the contamination of sludge which limits disposal and reuse options, and the exposure of personnel to chemical, explosion or fire hazards.

One industrial user was removed in 2021 due to no future discharge and the permit was vacated on January 31, 2021, which brings the total number of permitted industrial users to eight. Of the eight permitted industrial users, one is classified as categorical and seven as non-categorical industrial users. Inspection and sampling activities performed during the year included facility inspections, self-monitoring inspections, and compliance sampling. During 2021, no permitted industrial users were on a formal compliance schedule for non-compliance. However, during the 2021 calendar year, one violation notice was issued for a failure to notify of an oil/grease daily maximum effluent discharge limit exceedance.

4 Wastewater System Condition

4.1 Overview

CRW staff aim to ensure the entire Wastewater System is properly operated and maintained. The cost to provide routine and preventative maintenance is included in CRW's annual operating budget. CRW uses a proactive preventative maintenance program and a systematic replacement policy for inventory parts to minimize downtime.

Additionally, CRW has developed a comprehensive asset management program for the wastewater system which will further enhance preventative maintenance and increase system reliability. Asset registries have been developed for all CRW treatment plants, pumping stations, storage facilities, and the DeHart Dam facility. CRW has developed a risk register for CRW's buried assets and established high-level replacement, rehabilitation, and condition assessment cost estimates.

Development of the Wastewater Collection System Asset Management Plan was completed in January 2020. The plan provided CRW with strategies for operations, maintenance, capital investments, and funding.

4.2 Condition Assessment

Arcadis conducted a limited condition assessment of the key components of CRW Wastewater System, which included a review of existing information provided by CRW, discussions with CRW staff, and visual observations during field visits held on August 16, 2021. Based on the type of facilities, available documents related to the facilities, and previous experience with similar facilities, a representative sample of facilities was inspected on a limited basis to visually confirm the information provided, identify any apparent capital improvement needs, and discuss reliability and O&M performance with the operation and maintenance staff. No field investigations were conducted for buried infrastructure.

The condition assessment of the facilities in the Wastewater System was based on numerical ratings for the following criteria:

- Appearance of mechanical, structural, and electrical components
- Reliability
- O&M performance
- Capacity
- Regulatory compliance

Based on the evaluations using the above categories, an overall risk rating was assigned to each of the major assets. The risk ratings for each of the five categories above are outlined in **Table 4-1**.

Table 4-1: Summary of the Rating System

Numerical Rating	Interpretation of Rating	Description
1	Little to no risk	Relatively new and in good physical and operating condition.
2	Some risk	Good condition, no known capital requirements.
3	Moderate risk	Aged or worn but generally in good operating condition may require capital investment within 5 years.
4	Significant risk	Operational but nearing end of life and / or requires investment to bring to full operating condition.
5	High risk	Should be on high priority for renewal and/or replacement.

The following **Table 4-2** presents a summary of the risk ranking for each of the major facilities based on a review of the available information and limited visual inspections.

Table 4-2: Major Assets Risk Rating

Major Asset	Risk Rating	Change from Prior Year
AWTF	2.0	-0.2
Pump Stations and CSO Regulators		
 Front Street Pump Station (1.0) 		
 Spring Creek Pump Station (3.5) 	2.1	No Change
 City Island North Pump Station (2.0) 	2.1	No Change
 City Island South Pump Station (2.0) 		
 Market Street Stormwater Pump Station (2.1) 		
Combined Sewer Overflow Regulators (2.0)		
Interceptor Sewers		
 Front Street Interceptor (4.1) 		
 Paxton Creek Interceptor (4.8) 	3.5	No obongo
 Hemlock Street Interceptor (3.0) 		No change
 Spring Creek Interceptor (3.0) 		
 Paxton Creek Relief Interceptor (3.0) 		
 Asylum Run Interceptor (3.0) 		
Collection System	3.0	No change
Separate Stormwater Collection System	3.0	No change
Overall System Rating	2.7	-0.1

Overall, the Wastewater System is in fair condition; however, some components are aged and will require investigation and capital investment to preserve the asset and maintain appropriate system performance and delivery of services.

The risk rating of the AWTF has been lowered from the prior year due to recent improvements such as the in-house rehabilitation progressing with the primary clarifiers and completion of the primary digesters. The risk rating of the Spring Creek Pump Station has been raised from the prior year due to further deterioration. The risk ratings have not changed for the Market Street Pump Station and the City Island Pump Stations. The risk rating has not changed for the Front Street Pump Station due to the recent rehabilitation and upgrade of the pump station that was accounted for in last year's Consulting Engineer's Annual Report.

An arc flash study is recommended for the wastewater system to be in compliance with current NFPA 70E and OSHA 1910 (Subpart S) regulations. CRW intends to perform the arc flash studies in 2023.

The following provides a summary of the current condition of the major components, the rational for the risk scores assigned, and the improvements needed to address moderate, significant, and high risks.

4.2.1 AWTF

The AWTF, located on Elliot Street off South Cameron Street on the City of Harrisburg's border with the Borough of Steelton, treats wastewater conveyed from the Front Street Pump Station, the Spring Creek Pump Station, and the Trewick Street Pump Station (Borough of Steelton). It also treats trucked in wastewater. The site also contains the CRW collection system maintenance garage. The AWTF utilizes grit removal, primary clarification, oxic/anoxic biological treatment, chemical addition, final clarification, and disinfection to treat wastewater prior to discharge to the Susquehanna River. Additionally, AWTF thickens, anaerobically digests, and dewaters residuals from the wastewater treatment processes prior to farmland application as Class B residuals. CRW completed major improvements to the biological treatment and final clarification processes at the AWTF in 2016 which were intended to achieve the effluent limits for nutrient removal contained in its discharge permit.

The AWTF appears to be in fair overall physical condition based on the available documents and an Arcadis inspection on August 9, 2021. However, some capital investments and minor additional O&M expenditures should be made within the next five years to ensure continued compliance with effluent limits and reduce operating costs.

CRW has completed construction on primary digester number 2 in late 2020 and completed the rehabilitation of primary digester number 1 in July 2022.

An energy audit was performed for the AWTF in July 2017. The purpose of the audit was to provide a comprehensive list of energy efficiency improvements that CRW could perform to reduce overall energy consumption. Based on the results of the audit, CRW plans to implement various energy efficiency improvements at the AWTF. Already completed by CRW was the installation of a dissolved oxygen (DO) probe in the final effluent channel that measures the oxygen in the effluent and reduced the number of blowers in operation to maintain adequate DO without over aerating. CRW has evaluated alternatives for the implementation of solids handling improvements that would modify existing piping in the waste

activated sludge (WAS) and return activated sludge (RAS) pump stations to allow for RAS to be wasted instead of mixed liquor suspended solids (MLSS). By wasting RAS instead of MLSS, the pumping requirements are significantly reduced due to the increased solids concentration of the RAS compared to the MLSS. This change will be implemented as part of the AWTF Energy Recovery Improvements project, planned to bid in the Fall 2022 with a Notice to Proceed in early 2023 and project completion by mid-2024.

Additionally, CRW is in the process of implementing improvements to the existing primary clarifiers. The improvements to be made include the following:

- Structural repairs and rehabilitation of all clarifier tanks
- Primary clarifier mechanism replacement of all tanks (inclusive of main and cross collector drive units, chain and flight scrapers, influent gates, effluent weirs).
- Replacement of miscellaneous piping, valves, and actuators.
- Primary sludge pump replacement (2 units).
- Replacement of decant pump in the decant pump vault.

Currently, in-house are continuing to replace drives, gears, electrical, and other components in the primary clarifiers. Tanks 1 and 2 were completed by the end of 2021, tank 3 should be completed in 2022, and tank 4 may also be completed in 2022. The grease collection system and weirs are scheduled to be replaced within the next 5 years.

4.2.1.1 Biosolids Facility Review

In March 2017, a Biosolids Facilities Existing Conditions Report was completed by Whitman, Requardt & Associates (WRA). The purpose of this report was to provide an assessment of the current conditions of the solids treatment and handling systems at the AWTF. Based on the Biosolids Facilities Existing Conditions Report, WRA submitted in June 2017, a Preliminary Biosolids Facilities Improvement Plan for CRW, which included several recommendations as part of the improvement plan, including:

- Process modifications to separately thicken waste activated sludge and primary sludge
- Upgrade of the primary digesters
- Replacement of gravity thickener facilities
- Upgrade of the dewatering facilities
- Construction of a hauled waste facility
- Replacement of the boiler building
- Replacement of the combined heat and power (cogeneration) system equipment
- Replacement of the gas collection, storage and pretreatment systems

CRW completed the primary digester improvements, with the first digester on-line in 2020 and the second digester on-line in July 2022. The project also included an electrical building to help facilitate the replacement of old electrical gear and provide a central power distribution facility to serve the southern part of the AWTF. This electrical building was completed in 2021.

CRW is moving forward with replacement of the combined heat and power (CHP) system; the design is currently out to bid for comprehensive replacement of their biogas utilization and will be purifying the methane into renewable natural gas. Construction is expected to begin in 2023. CRW intends to prioritize work on the secondary digesters following completion of the primary digester improvements. Remaining biosolids facility projects will be evaluated for priority as the above projects are completed.

Additionally, from 2013 to present, nearly all of the biosolids generated by CRW have been land applied for beneficial use by agriculture. Biosolids hauling to the farms is provided by a contracted hauler. The 13,250 wet tons of biosolids produced by CRW requires approximately 623 acres of beneficial use. CRW has approximately 1,327 qualified acres (including 196 acres acquired in 2022), which provides a buffer of 704 acres.

Recommendations from WRA's regulatory biosolids review include a recommendation that CRW should periodically have a phosphorous source coefficient test performed as part of routine monitoring, which can be used in the future in site index calculations of phosphorous management is implemented by PADEP. Further, WRA notes that there are several regulatory and non-regulatory drivers that could potentially affect biosolids land application programs, including limiting phosphorous application, odor considerations, and farmland availability. While there are no federal biosolids regulatory changes planned, PADEP indicated that the new General Permit would include new phosphorous management and hauled waste requirements. CRW's qualified acreage has been approved by PADEP.

4.2.2 Pump Stations

CRW maintains five wastewater or stormwater pump stations: Front Street, Spring Creek, City Island North, City Island South, and Market Street.

4.2.2.1 Front Street Pump Station

The Front Street Pump Station is located at 830 South Front Street in the City of Harrisburg and receives combined sewage flows from the 42-inch by 42-inch Front Street interceptor and 60-inch diameter Paxton Creek interceptor. The pump station was recently upgraded, including replacement of pumps, bar screens, screenings conveyance equipment, controls, and associated improvements to electrical, HVAC, and building systems to meet current code requirements. Construction of the facility was completed in 2021.

4.2.2.2 Spring Creek Pump Station

The Spring Creek Pump Station is located southwest of the intersection of South Cameron Street and Magnolia Street in the City. It conveys combined sewage from the Spring Creek Interceptor and the Hemlock Street Interceptor to the AWTF. Hazen and Sawyer prepared an engineering report dated April 21, 2015 that assessed the condition of the station as part of an investigation into improving wastewater screen performance at all CRW's major wastewater facilities. The station appears to be in fair overall physical condition based on the available documents and an inspection by Arcadis on August 16, 2022. Many of the pump station components are near the end of their useful life, including the pumps, HVAC system, and electrical and control systems. Capital investments should be made within the next five years to ensure continued operation and to reduce operating costs.

The bar screen continues to have minor repairs made to keep it in service.

Spring Creek Pump Station will be evaluated as part of a CIP project in FY 2026 to determine if additional improvements will be made to the existing Spring Creek Pump Station or if a new Pump Station will be constructed along with CSO storage.

4.2.2.3 City Island Pump Stations

The City Island North Pump Station is located at the north end of City Island in the City of Harrisburg. Sewage is conveyed from the City Island South Pump Station and elsewhere on City Island to the CRW collection system in Harrisburg proper. The station appears to be in good overall physical condition based on the available documents and an inspection by Arcadis on August 16, 2022. During the inspection, there were no noted defects. Currently CRW operates the pump station but has not accepted ownership of the pump station.

The City Island South Pump Station is located near the center of City Island in the City. It conveys sewage from elsewhere on City Island to the CRW collection system in Harrisburg proper. The station appears to be in good overall physical condition based on the available documents and an inspection by Arcadis on August 16, 2022. It was noted during the inspection that the pump station continues to be bypassed and flow is being directed to the City Island North Pump Station. This is due to the lack of pumping requirements out of both facilities as pumping is not required at both stations to accommodate service flow requirements. During the inspection, there were no noted defects. Currently CRW operates the pump station but has not accepted ownership of the pump station.

4.2.2.4 Market Street Pump Station

The Market Street Pump Station conveys stormwater from a railroad underpass to Paxton Creek. The station appears to be in good to fair overall physical condition based on the available documents and an inspection by Arcadis on August 16, 2022. However, some additional O&M expenditures should be made within the next five years to ensure continued operation and to reduce operating costs. For example, concrete cracks were observed at the following locations: floor surfaces in the generator building, along the east side of the exterior of the building, and at the stairs leading to the entrance to the Pump Station. Additionally, the 4th pump is to be replaced by the end of 2022.

4.2.3 Collection System

CRW wastewater system includes approximately 33 miles of sanitary sewers, 40 miles of stormwater sewers, and 87 miles of combined sanitary and stormwater sewers. Approximately 80% of the collection system was installed prior to 1940. Regulators and diversion chambers serve to divert excess flows to the Paxton Creek or the Susquehanna River during wet weather events.

While the collection system was not inspected by Arcadis during its August 2022 field visit, CRW has completed several inspection efforts associated with its collection system. In April 2017, CRW issued a Collection System Rapid Assessment Findings and Recommendations Report, where the findings of the assessments performed in 2012, 2015, and 2016 were summarized and recommendations were provided. The Report recommended that CRW complete the immediate sewer repairs that were identified

and to continue to televise the collection system over the next 4 to 6 years. The information from this Report was used as a baseline to populate CRW's GIS system for high level condition assessment and CRW continues to gather more accurate and thorough information via CCTV inspections. This information is then coalesced into CRW's Sewer Collection System Asset Management Program (AMP); CRW is implementing Info Asset Planner as the software to help prioritize work. Priorities for sewer pipe repairs change annual as CRW continues to CCTV the collection system. The highest priorities are addressed under their emergency and maintenance sewer contracts and others are addressed through annual Sewer System Improvement Projects.

In October 2019, Herbert, Rowland & Grubic, Inc. (HRG) prepared "Sewer Replacement Project Study Phase – Report of Findings" for CRW following the review of CCTV inspections of the sewer pipe sections completed by CRW. HRG recommended the repair/replacement of the identified sewer sections in their report. This 2019 Sewer System Improvements Project was completed between March 2019 and February 2020.

In 2021, HRG was retained by CRW to evaluate potential cost savings for the Arsenal Boulevard Area Sewer Improvements – Phase 1 project prepared by CDM Smith. The original estimate for the work was valued at \$4.4M. Through their evaluation of the bid documents and review of available information with several utility contractors to identify construction risks and overall constructability, HRG identified four recommendations for consideration to potentially save approximately \$2.2M. These four recommendations were incorporated into the project re-design performed by HRG. Tentative project advertisement is scheduled for January 2023 pending acquisition of new sewer easements.

In 2021, CRW engaged KCI Technologies to provide CCTV inspection of approximately 35,500 feet of collection and conveyance pipe. KCI provided a memo on September 30, 2021 summarizing the methodology and findings of the CCTV inspections, as well as the associated data management work using Cityworks and GIS. The goal of this work was to obtain quality CCTV to aid CRW in the development of future Sewer System Improvement Projects separate from those originally captured in the Rapid Assessment Reports.

4.2.3.1 Sewer Interceptors

CRW operates and maintains a total of six (6) interceptor sewers. Four of these interceptors convey combined wastewater, including the Front Street Interceptor, Paxton Creek Interceptor, Paxton Creek Relief Interceptor, and the Hemlock Street Interceptor. Each of these interceptor sewers receive combined wastewater from trunk lines, and each trunk line has an associated CSO regulator structure and outfall. Two of the interceptors convey sanitary wastewater, including the Spring Creek Relief Interceptor and the Asylum Run Interceptor.

A May 3, 2017 memorandum prepared by CDM Smith provided CRW with an update of the interceptor cleaning and rehabilitation improvements.¹ As the interceptor cleaning was completed, additional inspections of the interceptors were conducted providing better detail and evaluation of the existing conditions than the initial inspections. In some cases, this resulted in expanding the scope of proposed improvements for sewer and manhole rehabilitation. Additional areas were recommended for

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¹ Memorandum from CDM Smith to CRW entitled "Capital Region Water Interceptor Cleaning and Rehab Improvements Update", dated May 3, 2017.

rehabilitation within the Paxton Creek Interceptor and the Front Street Interceptor. The opinion of probable construction cost for the Paxton Creek Interceptor was estimated to be \$7.3 million, \$1.6 million for the Asylum Run Interceptor, \$9.4 million for the Front Street Interceptor, and \$2.5 million for the Spring Creek Interceptor. CRW completed rehabilitation and replacement of the Asylum Run Interceptor in 2018 (substantial completion was issued in January 2019). However, until the upgrades of the Spring Creek Pump Station are confirmed, the schedule and design of the Spring Creek Interceptor improvements that feeds the pump station cannot be determined.

The Paxton Creek Interceptor rehabilitation project was initiated in 2017 utilizing spin-cast applied geopolymer due to the irregular shape of the pipe. Construction was halted when the condition of the pipe worsened and efforts to control active leakage was beyond the scope of the project. In November 2019, JMT issued a memo which reviewed alternate rehabilitation technologies and recommended sliplining due to potential cost savings of above ground feature restoration. At this time, the current CIP shows construction beginning in 2026; however, the project approach is still unknown pending the Paxton Creek Stream De-channelization project in coordination with PennDOT, Dauphin County, and the City of Harrisburg. Until a schedule for the creek project is determined, preliminary design will not proceed.

In March 2019 CDM Smith performed a two-phase evaluation of the rehabilitation/lining alternatives under consideration for the Front Street Interceptor. Phase 1 of this project included rehabilitation of approximately 1,730 LF was completed under CRW's emergency and maintenance contract in October and November 2019. In August 2020, CRW engaged AECOM to develop contract documents to rehabilitate the remaining non-circular portion of the Front Street Interceptor (14,400-LF) by either Cured-In-Place-Pipe or Segmented-Slip-Lining (competitively). AECOM provided a memorandum in December 2020 recommending the Front Street Interceptor be rehabilitated with Cured-In-Place Pipe. Bids were advertised for the phase 2 rehabilitation project in April 2022 with notice to proceed being issued in August 2022. Construction is anticipated to be complete by Fall 2023.

4.2.3.2 CSO Outfalls and Regulators

CRW operates and maintains 59 CSO regulator structures located along Front Street, Paxton Creek, and Hemlock Street Interceptors, which ultimately direct combined flows of wastewater and stormwater to the AWTF. During dry weather, the CSO regulators divert all of the combined flows from the trunk sewer lines to the interceptor sewers. During wet weather, the CSO regulator structures divert a controlled volume of flow to the interceptors, while untreated excess combined flow is discharged to receiving waters. In addition to the 59 CSO regulator structures and outfalls, there are two additional CSO outfalls at the Front Street pumping station and the Spring Creek pumping station that activate only during mechanical failure of the pump stations or if the pump station capacities are exceeded.

The 59 CSO regulators and diversion chambers are inspected by CRW once per day, 7 days per week to ensure proper operation, identify combined sewer overflows, identify river intrusion into the interceptor system, identify and correct operational problems, and to identify and schedule required maintenance. CRW continues to develop recommendations for early action projects to address critical structural deterioration and river intrusion. There are two remaining CSO outfalls scheduled for repair that will be repaired in combination with the Paxton Creek Interceptor rehabilitation project.

5 Capital Improvement Plan

5.1 Overview

CRW prepares a capital improvement plan (CIP) that identifies the major planned projects and initiatives for the Wastewater System. The CIP includes projects that are required to replace aging infrastructure, enhance or expand services to customers, provide resiliency and redundancy, and increase cost effectiveness and efficiency. Portions of the CIP are related to repair and replacement of assets that are beyond their useful life and other portions address requirements under the Consent Decree, the LTCP, and other regulatory driven projects.

CRW's CIP as of the date of this report is summarized in Table 5-1. Below is a brief discussion of the capital projects and a summary of the review findings.

5.2 AWTF Upgrades

In March 2016, CRW completed an upgrade to its AWTF, adding biological nutrient removal in order to comply with the Chesapeake Bay Tributary Strategy and meet new NPDES permit discharge requirements.

In addition, the following maintenance projects were completed at the AWTF in 20212:

- Full replacement of Diluent Water Pumps #1 and #2 at the Settled Sewage Pumping Station.
- Replacement upgrade Belt Filter Press Feed Pumps #1 and #2.
- Full replacement of Primary Clarifier #2 Drives, Electrical wiring and Disconnects and Collection Mechanism.
- 5 Mechanical Drive replacements on #3 Primary Clarifier.
- Replacement of #4 Gormann Rupp Pista-Grit Pump.
- Replacement of #1 and #3 VFD Drives.

The following are anticipated projects at the AWTF for 2022:

- Replacement of Plant Drain Pump #3.
- Replacement of 30hp Stormwater pump at Market Street Pumping Station.
- Full replacement of drives and sludge collection mechanisms for Primary Clarifier #3 and #4 (drives only replaced on #3 in 2021).
- Replacement of upgraded #4 settled pump assembly and mechanical seal.
- Refurbish metallic bar-screen mechanical equipment at the Spring Creek Pump Station.
- Install new Divert Pumps and Heat Trace supply piping.

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² Chapter 94 Municipal Wasteload Management Report and Semi-Annual Report on Consent Decree Implementation, March 2022.

5.3 Pump Station Capital Improvements

The Front Street Pumping Station was recently upgraded and completed in 2021. CRW plans to evaluate options for potential upgrades of the Spring Creek Pumping Station in FY 2026 to determine if additional improvements will be made to the existing Spring Creek Pump Station

5.4 Conveyance Capital Improvements

CRW has included several conveyance capital improvements in its CIP for FY 2023 shown in Table 5-1. These include the Paxton Creek, Front Street, and the Arsenal Boulevard sewer improvements. Currently the Paxton Creek Interceptor rehabilitation experienced unexcepted high costs due to difficult site conditions and was stopped in December 2018. The project approach is pending the Paxton Creek Stream De-channelization project in coordination with PennDOT, Dauphin County, and the City of Harrisburg. Until a schedule for the creek project is determined, preliminary design will not proceed. CRW will evaluate the schedule and design for Spring Creek Interceptor improvements after the upgrades of the Spring Creek Pump Station are confirmed.

In addition, collection system cleaning, rehabilitation, and replacement work is expected to be an ongoing annual capital need. In addition to the conveyance capital improvements, CRW plans to implement multiple Long-Term Control Plan related capital projects, including several green stormwater infrastructure projects, as shown on the "SW" line in **Table 5-1**.

5.5 Discussion

CRW's capital plan is in general alignment with Arcadis' observed requirements for the Wastewater System. Once the improvements to the Paxton Creek Interceptor and improvements to the Spring Creek Pump Station that is fed by the Spring Creek Interceptor are finalized, the capital plan should be revised as necessary. CRW generally has a good understanding of capital project needs and should prioritize projects based on urgency and affordability. CRW may proceed to reschedule and reprioritize various projects to balance the capital needs over the next several years. It is recommended that CRW update its cost estimates and capital funding plans for these projects as additional information becomes available.

Consulting Engineer's Annual Report – Wastewater System

Table 5-1: Capital Improvement Plan

Location	Description	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027
AVACTE	AWTF Energy Recovery Improvements - Construction,					
AWTF	Engineering, and Construction Management	\$ 12,150,000	\$ 3,325,000	-	_	-
A) A / T	Primary Clarifier Improvements - Construction, Engineering,					
AWTF	and Construction Management	\$ 3,960,000	\$ 3,410,000	-	-	-
AWTF	Primary Digester Insulation	\$ 500,000	-	-	_	-
AWTF	Dewatering Upgrade	_	-	_	\$ 1,000,000	\$ 1,000,000
AWTF	Plant Window & Door Replacement	\$ 100,000	\$ 100,000	_	-	-
AWTF	Switchgear and New Line for Cyro Compressors	\$ 170,000	_	_	_	-
AWTF	Elliot Street - Paving project for plant entrance	\$ 35,000	_	_	_	-
	Garage Door Replacements (Heavy Equip Garage plus Old	,				
AWTF	Maint Garage)	-	\$ 50,000	_	_	-
AWTF	Other Plant Upgrades and Equipment	_	\$ 250,000	\$ 250,000	\$ 250,000	\$ 300,000
AWTF	Gravity Thickeners - Equipment Replacement	_	\$ 190,000	\$ 1,900,000	_	-
AWTF	Secondary Digesters Conversion	_	,	\$ 1,000,000	\$ 5,000,000	\$ 5,000,000
	Collection System Rehab - Construction, Engineering, and					
Convey	Construction Management	\$ 3,852,200	\$ 3,967,700	\$ 4,086,500	\$ 3,826,730	\$ 3,941,532
-	Paxton Creek Interceptor - Construction, Engineering, and					, ,
Convey	Construction Management	\$ 350,000	\$ 350,000	\$ 350,000	\$ 10,000,000	\$ 10,000,000
,	Arsenal Blvd Construction, Engineering, and Construction	,	•	•		
Convey	Management	\$ 2,970,000	_	_	_	-
Convey	Other Multi-Model CCTV Investigations (0065)	\$ 500,000	_	_	_	-
Convey	Front St. Interceptor Rehab P2 - Construction	\$ 15,365,000	_	_	_	_
Convey	Collection System Repairs(50/50 w/Storm)	\$ 154,000	\$ 158,620	\$ 163,378	\$ 168,279	\$ 173,327
Convey	Street Restoration	\$ 211,150	\$ 217,485	\$ 224,009	\$ 230,729	\$ 237,651
Convey	Trash Pumps	-	-	\$ 72,000	\$ 28,000	· -
-	PennDOT I-83 Expansion - Construction, Engineering, and			•	,	
Convey	Construction Management	\$ 110,200	\$ 250,000	\$ 250,000	\$ 1,352,000	\$ 250,000
_	SW PennDOT I-83 Expansion - Construction, Engineering,	,	•	•		•
Convey	and Construction Management	_	_	_	\$ 5,775,000	_
Convey	Spring Creek Interceptor Rehab/Storage/Pump Station			\$ 1,400,000	4,700,000	\$ 4,700,000
Convey	CSO Regulator Modifications	_	\$ 1,155,000	-	-	-
Convey	Fleet Renewal	\$ 600,000	610,000	\$ 462,000	\$ 287,500	\$ 297,000
SW	Future Stormwater CIP	\$	1,676,900	1,591,500	2,751,000	\$ 2,849,000
	Total	\$ 45,074,252			35,369,238	\$ 28,748,510
		,	,,	,,	,,	,,

¹Project costs are presented in 2022 dollars.

²Collection System Rehab estimates subject to change based on ongoing asset management efforts.

6 Operations and Maintenance Expenses Review

6.1 Overview

The Trust Indenture (Section 7.12) requires CRW to adopt a Wastewater System budget each year. CRW typically adopts a finalized budget in November, two months prior to the start of the new fiscal year. CRW utilizes the capital plan and O&M recommendations in this CEAR to assist in establishing the budget. However, it should be noted that this CEAR only serves to provide advice and recommendations regarding capital additions and amount of funds that should be expended to meet incremental O&M expenses. CRW must then establish a realistic funding and financing plan that serves to meet these goals, which may necessitate reprioritization of projects and programs.

6.2 Historical Wastewater System Expenses

A summary of CRW's historical actual O&M expenses for FY 2020 and FY 2021 and the budgeted O&M expenses for FY 2022 are shown in **Table 6-1**. These expenses were reviewed to and determined to be in general alignment with overall O&M needs of the Wastewater System.

Table 6-1: Historical Wastewater System Expenses

	Histo	Budget					
Description	FY 2020	FY 2020 FY 2021			FY 2022		
O&M Expenses:							
Salaries and Wages	\$ 3,278,162	\$	3,483,596	\$	3,795,491		
Benefits and Taxes	\$ 1,405,484	\$	1,566,039	\$	1,653,602		
Contracted and Professional Servic	\$ 1,255,994	\$	1,463,317	\$	2,185,300		
Repairs, Maintenance, and Supplie	\$ 637,637	\$	565,888	\$	610,357		
Electricity	\$ 728,599	\$	811,100	\$	826,000		
Chemicals	\$ 387,454	\$	333,656	\$	550,000		
Water	\$ 172,062	\$	193,031	\$	192,000		
Refuse	\$ 644,417	\$	832,327	\$	660,000		
Nutrient Credits	-		-	\$	-		
Insurance	\$ 360,038	\$	419,651	\$	460,872		
Administrative Fee	\$ 2,863,837	\$	2,899,923	\$	3,158,790		
Street Sweeping	\$ 197,094	\$	122,478	\$	250,120		
Other Operating Expenses	\$ 358,517	\$	341,309	\$	380,035		
Total Annual O&M Expenses	\$ 12,289,295	\$	13,032,316	\$	14,722,567		

Source: Historical actual expenses in FY20 and FY21 and budgeted expenses in FY22 provided by CRW

7 Conclusions

Set forth below are the principal conclusions that have been reached regarding our review of the Wastewater System and associated information provided by CRW:

- In 2021, the AWTF had no hydraulic or organic overloads recorded as the monthly average flow did not exceed the design capacity and no organic overload conditions are expected through 2026.
- There were 44 reported secondary bypass events during 2021, 24 of which resulted in flow bypassing secondary treatment at the AWTF. Twenty bypass events triggered the bypass gate to open but with no flow bypassing secondary treatment. All bypass events were due to wet weather.
- 3. Based on Arcadis' field inspection, the AWTF and Spring Creek Pump Station are aged but generally in good operating condition and requiring capital investment within 5 years. Based on Arcadis' field inspections and review of documentation, the Front Street Pump Station, City Island Pump Stations, Market Street Pump Station, and combined sewer overflow regulators are in good condition with no known capital requirements currently. Overall, the Wastewater System is in fair condition requiring capital investment within 5 years.
- 4. CRW's capital plan is in general alignment with Arcadis' observed requirements for the Wastewater System. CRW generally has a good understanding of capital project needs and should prioritize projects based on urgency and affordability. Once CRW completes the evaluation of improvements to the Spring Creek Pump Station and Spring Creek Interceptor, the capital plan should be revised.
- An arc flash study is recommended for the wastewater system in order to be in compliance with current NFPA 70E and OSHA 1910 (Subpart S) regulations. CRW intends to perform the arc flash studies in 2023.

This CEAR summarizes the work completed up to the date of the issuance of this CEAR. Changed conditions occurring or becoming known after such date could affect the material presented to the extent of such changes. Arcadis has no responsibility for updating this CEAR for changes that occur after the date of this report.

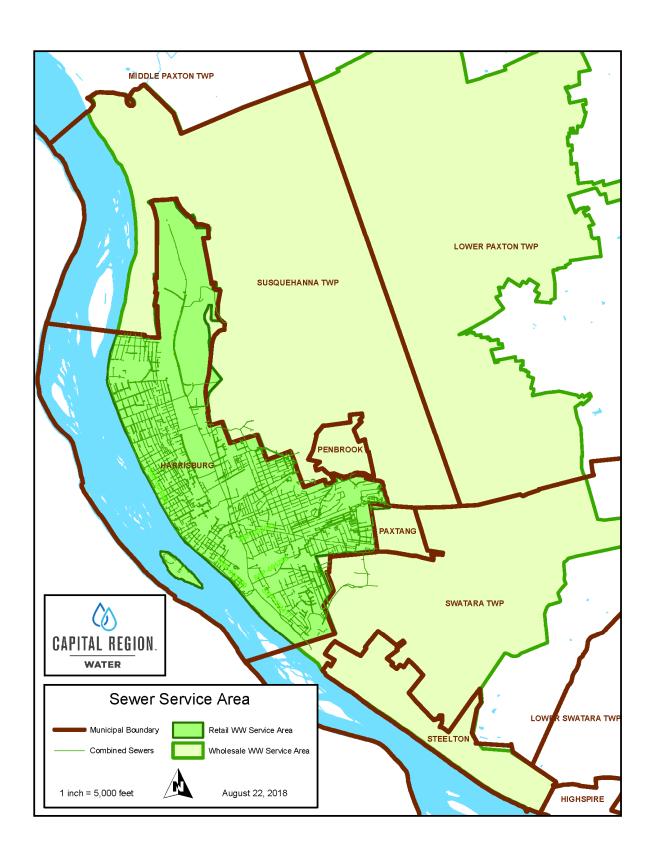
In preparation of this CEAR, Arcadis has relied upon financial, engineering and operational data, and assumptions prepared by and / or provided by CRW. In addition, information and projections have been provided by other entities working on behalf of CRW. We believe such sources are reliable and the information obtained to be appropriate for the review undertaken and the conclusions reached in this CEAR. To the best of our knowledge, information and belief, the information does not omit material facts necessary to make the statements herein. However, Arcadis has not independently verified the accuracy of the information provided by CRW and others. To the extent that the information is not accurate, the findings and recommendations contained in this CEAR may vary and are subject to change.

Arcadis devoted effort in making such opinions consistent with that degree of care and skill ordinarily exercised by members of the same profession currently practicing under same or similar circumstances and the time and budget available for its work in its efforts to endeavor to provide such opinions. The

opinions are based on information provided by and consultations with CRW. No responsibility was assumed for inaccuracies in reporting by CRW or any third-party data source used in preparing such opinions. Arcadis' opinions represent its professional judgment. Neither Arcadis nor its parent corporation, or their respective subsidiaries and affiliates, makes any warranty, expressed or implied, with respect to such opinions.

Appendix A

Wastewater System Service Area



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