



MUNICIPALITY OF BETHEL PARK

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October 16, 2012

Chester Ref. No. 12-5289-MC-A Task 79

Mr. Tim Prevost, P.E.
Allegheny County Sanitary Authority
3300 Preble Avenue
Pittsburgh, Pennsylvania 15233

Re: Municipality of Bethel Park/Bethel Park Municipal Authority
Formal Public Comments to ALCOSAN Wet Weather Plan

Dear Mr. Prevost:

The Municipality of Bethel Park and the Bethel Park Municipal Authority are submitting the following comments in response to the ALCOSAN Wet Weather Plan provided at the end of July 2012. As you are aware, the Authority and Municipality have been very active with respect to their Points of Connection to the ALCOSAN system and are very concerned regarding the affects the WWP could have on the Municipality.

1. During the hydraulic modeling stage development of the plan, the Municipality and Authority informed the Chartiers Basin team of an issue with the data utilized for calibration. It was our position that the use of February 2008 data for calibration is incorrect and results in significantly higher modeled flows than the use of re-calibrated March 2008 data. Furthermore, the same holds true for the June 2008 data for the summer storms. Use of a re-calibrated model may result in the need for a smaller diameter relief interceptor. Bethel Park utilized the re-calibrated data for POC C-53-10 analysis resulting in a decrease of peak flows of over 50%.
2. The Municipality and Authority are very concerned regarding the lack of improvements proposed by the WWP for certain sewersheds and the potential requirement by the regulators to construct improvements to convey sewage to an ALCOSAN trunk sewer that does not have the required capacity to convey peak flows. Specifically, for the Saw Mill Run Watershed, Bethel Park has proposed the upsizing of an existing pipe to convey the 2-year storm to POC CS-52 in order to eliminate sanitary sewer overflows from two upstream locations. If ALCOSAN does not provide an upsized pipe or a relief pipe at CS-52, we do not believe the ALCOSAN system will have the capacity available to convey the new peak flows from Bethel Park and overflows will most likely occur at the connection point. Is it the intention of your currently submitted plan to continue to have overflows at or near CS-52 during 2-Year or greater precipitation events?

Does ALCOSAN see any benefit in Bethel Park upgrading its sewer to be able to convey more flow than the ALCOSAN system can convey?

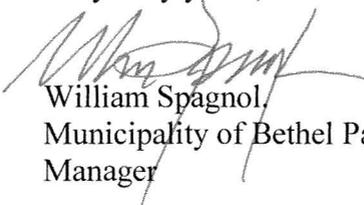
3. The steps in the WWP development do not appear to allow adequate time for ALCOSAN and the upstream Municipalities to develop a potential overall cost effective approach. As we see the process, Step 1 was for the municipalities to provide peak flows for 1-Year, 2-Year, 5-Year, and 10-Year storms based on a model developed by ALCOSAN. Step 2 was for the municipalities to then perform an analysis to determine the most cost effective means to eliminate overflows in their system through conveyance, storage, or flow reduction before conveying to ALCOSAN. Step 3 was for ALCOSAN to then utilize the municipal information to determine the most cost effective means of handling all the flows once they were conveyed to the ALCOSAN system. The overall process seems to be more of a parallel process versus an integrated process. An integrated process may result in a more regional approach with lower costs. Does ALCOSAN foresee a time when the integrated process will occur?

4. The WWP does not appear to address the fact that some communities have spent millions of dollars completing improvements in the ALCOSAN area in order to reduce peak flows while others have spent almost nothing. It appears that ALCOSAN will develop an overall rate structure that treats all customers similarly whether or not a community has completed improvements. In this vein, these pro-active communities will have subsidized the communities that have not completed any or only minimal improvements.

5. With respect to future rates, does ALCOSAN have any intention of charging combined sewer communities a higher rate than separate sewer communities? In the past, CSO communities were able to discharge flows over a certain volumes legally. Based on new regulations, the volumes/rates that can be legally bypassed appear to have decreased substantially and ALCOSAN is being required to convey and treat the flows that were bypassed in the past. Why should separate sanitary sewer communities that already have to maintain storm sewer systems pay the same as combined sewer communities?

Should you require any additional information regarding the comments and questions listed previously, please do not hesitate to contact Michael Smith at (412) 831-6800 ext 382, Jean Statler at (412) 831-6800 ext 136 or John Balewski at (412) 809-6624.

Very truly yours,


William Spagnol
Municipality of Bethel Park
Manager

Very truly yours,


James F. Boyle, PE
Bethel Park Municipal Authority
Chairman