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COLLIER TOWNSHIP

www.colliertownship.net

October 18, 2012

Ms. Arletta Scott Williams, Executive Director Allegheny County Sanitary Authority 3300 Preble Ave Pittsburgh, PA 15233

Subject: ALCOSAN Draft Wet Weather Plan

Dear Ms. Williams:

This letter addresses official comments of the Township of Collier (Township) regarding the subject Draft Wet Weather Plan (DWWP) as it pertains to the Township.

- 1. It should be noted that the ALCOSAN DWWP identifies the Township as tributary to the following points of connection; the Township is only responsible for the sewer system tributary to C-50. All other sewers are the responsibility of the Collier Township Municipal Authority.
 - C-45A, C45B-08, C-46, C-50, C-50A, C-50A-06, C-50A-12, C-52, C-53-06, C54-06, C-54-07, C-54-12 and C-54-18
- 2. Tables 3-13, 4-4, 4-6 and 4-7 of the DWWP identify the Township as the owner of four sanitary sewer overflows. This should be changed to show the owner as the Collier Township Municipal Authority.
- 3. What, if any, restrictions will exist at the Township point of connection after ALCOSAN completes work within Chartiers Creek? Will ALCOSAN provide sufficient capacity for all flows conveyed by the Township up to and including the 10-year design storm? If capacity isn't provided by ALCOSAN at the point of connection and overflows remain, who will be responsible for any overflows that occur at the point of connection?

4. The ALCOSAN DWWP assigns a value of \$530 million dollars for municipal improvements and then spreads these costs evenly among all of the municipalities within the ALCOSAN service area. It was not clear what the source of the \$530 million dollar value is. There is a figure provided that shows the proposed municipal projects, however a corresponding table that lists the projects along with the costs for each would be helpful. With the information provided, it cannot be determined if the value used by ALCOSAN for work proposed by the Collier Township Municipal Authority matches the submission.

Appendix B of the DWWP presents Average Dry and Wet Weather Flow in gallons per day for each of ALCOSAN's points of connection. Is it ALCOSAN's intent to hold the communities tributary to each point of connection to that flow rate? It is suggested that a column be added to this table or a separate table be added to the DWWP that shows the peak wet weather rate for each POC that ALCOSAN has designed its facilities for.

5. 11 communities, including the Township, and ALCOSAN entered into a consent decree with the Pennsylvania Environmental Defense Fund (PEDF) that, among other items, required all sanitary sewer overflows (SSOs) to be eliminated by 2019. The ALCOSAN DWWP specifically states that the 2019 deadline will not be met. Further, ALCOSAN is proposing a 2-year design storm, while the PEDF consent decree requires SSOs to be eliminated without any specifics on a design storm. Does ALCOSAN intend to renegotiate with PEDF to extend the 2019 deadline. Will ALCOSAN accept responsibility for any overflows that remain after the 2019 deadline?

Sincerely,

TOWNSHIP OF COLLIER

Salvatore M. Sirabella,

Manager

CC: Board of Commissioners

Bob Caun

Lennon, Smith, Souleret Engineering, Inc

Michael Kaleugher Esa. CTMA