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October 18, 2012 C-17749-1207

ALCOSAN 3300 Preble Avenue Pittsburgh, PA 15233

ATT: Tim Prevost, ALCOSAN

RE: Comments to the ALCOSAN Wet Weather Report

Borough of Dormont

Dear Tim,

On behalf of the Borough of Dormont, we have reviewed the ALCOSAN Wet Weather Report and have the following comments:

1. Section 1.3 Page 1-9 reads as follows – "This WWP addresses the elimination of sanitary sewer overflows and the control of combined sewer overflows from ALCOSAN's Conveyance and Treatment Systems, including overflow structures located at the points of connection with the municipal collection systems. The Plan does not directly address the elimination or control of overflows within the municipal collection systems. However it provides for the hydraulic capacity to accept additional wet weather flows from the municipalities which may be conveyed to the ALCOSAN Conveyance and Treatment System pursuant to municipal feasibility studies to be complete under separate compliance orders"

<u>Comment:</u> The affordability analysis indicates that not all projects can be completed under the Selected Plan, and therefore not all connections from the municipal systems to the ALCOSAN system will be updated. How will additional flows sent to ALCOSAN be handled if the municipalities update their systems, but ALCOSAN does not?

2. Section 9.3.3 Page 9-80 reads as follows – "In some cases, even after the follow-through coordination was completed, information from a particular municipality was still incomplete, was judged to be unreliable or a preferred control strategy could not be clearly identified. In these cases, the basin planner assumed a control strategy, assumed a level of control and the associated costs, and/or identified areas within the existing municipal sewer system that had adequate hydraulic capacity to convey peak wet weather flow to the ALCOSAN system and where no capital improvements or control facilities were required." This same assumption is stated throughout the report.



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<u>Comment:</u> Please refer to the letters dated July 31, 2012 for MH-18, S-15 and SMRE-40, in which the Borough of Dormont indicated that they will be conveying all flow to ALCOSAN.

3. Section 10.1 Page 10-2 reads as follows – "This 2026 Plan assumes municipalities will implement all of their planned improvements by 2026 to eliminate municipal SSOs and control municipal CSOs by 2026, bringing substantial improvement to local tributaries streams."

<u>Comment:</u> The affordability analysis indicates that not all projects can be complete under the Selected Plan, and therefore not all SSOs will be eliminated in areas where no improvements are being made by ALCOSAN. How will these SSOs be handled? If every municipality decides to convey flows to ALCOSAN but no work is being completed in the basin, will new or increased SSOs be created?

4. The Wet Weather Plan assumes an annual cost per municipality of \$210 per customer based on a uniform distribution of all the municipal costs. This number appears to be approximately two-thirds of which would be expected from the Dormont projects thus resulting in a residential indicator closer to 2.1%. These numbers will be further refined based on debt service, annual operation and maintenance costs, financing options, etc. as part of the financial impact section of the Dormont Feasibility Study Report due in July 2013.

If you have any questions or need further clarification, do not hesitate to contact us.

Sincerely,

THE GATEWAY ENGINEERS, INC.

Emily Jo Gaspick, P.E., LEED AP

Project Manager

cc: Borough of Dormont Council
Jeffrey Naftal, Borough Manager
John F. Cambest, Solicitor
Michael Skinner, P.E, Project Manager
Ruthann L. Omer, P.E., Borough Engineer

EJG/RSO

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