

From: Gary Koehler [<mailto:GKoehler@fox-chapel.pa.us>]

Sent: Tuesday, October 27, 2015 9:59 AM

To: Timothy Prevost <Timothy.Prevost@alcosan.org>

Subject: Comments regarding Starting at the Source

Tim,

While I will not attempt to review specific details of the study, my general impressions are:

- There is no guidance or definition provided for acceptable flow limits/ specific targets even though targets and limits are mentioned over 20 times. This is concerning given EPA's 308 letter to ALCOSAN dated June 3, 2015, requiring flow targets for each municipality by January 31, 2016.
- There is not any comment as to **equity** of flow target/ limits for SSO versus CSO communities. Specifically, why should an SSO community spend hundreds of thousand of dollars to remove a limited amount of I & I and observe a downstream CSO community not expending any dollars and doing nothing to eliminate direct stormwater connections into the ALCOSAN system?
- I could find no particular specific goal or target to be achieved by ALCOSAN or its customers in this study such as "gallons removed".

Sincerely,

Gary

Gary J. Koehler

Manager

Fox Chapel Borough

401 Fox Chapel Road

Pittsburgh, PA 15238

412-850-5022

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