



Borough of Baldwin

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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:

Please find below the Borough of Baldwin's (Borough) official comments regarding the ALCOSAN Draft Wet Weather Plan (DWWP).

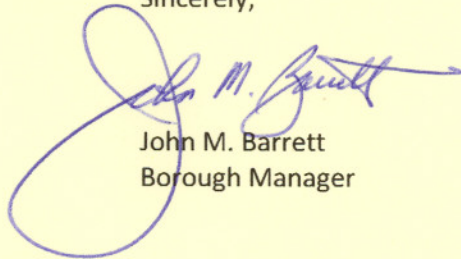
1. The joint alternatives analysis performed for the M-34 (Becks Run) and M-42 (Streets Run) points of connection by the Pittsburgh Water and Sewer Authority (PWSA) and the upstream municipalities assumed free discharge to the ALCOSAN system. Under the ALCOSAN recommended plan, it is not proposed to extend any ALCOSAN facilities to the points of connection that the Borough is tributary to. **What restrictions will exist at these points if no facilities are being proposed by ALCOSAN?** The current leading alternative for Streets Run is upsized conveyance to ALCOSAN. **Will ALCOSAN provide sufficient capacity for all flows conveyed by the Borough up to and including the 10-year design storm? If capacity isn't provided by ALCOSAN at the point of connection and the Borough moves forward with a convey-all alternative, who will be responsible for any overflows that occur at the point of connection?**
2. 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, and the Borough would like to request those details.** 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 in Streets Run matches the PWSA submission. Also, costs are not truly distributed evenly. Some communities may have project costs well over the average; which we believe is the case in Baldwin Borough, depending on the estimated value used. Additionally, Baldwin Borough would like specifics on what assumptions were used in your determination of Baldwin Borough's current and future costs depicted in your table. If ALCOSAN's assumptions do not materialize as planned, your future cost projections for Baldwin Borough's ratepayers could be invalid. Baldwin Borough's actual project costs may push the

percentage of median household over 2%, the percentage which EPA has set as affordable.

3. 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 should be noted that PWSA on behalf of the communities tributary to M-34 and M-42 have previously provided ALCOSAN with hydrographs that show the flow rates for the typical year and various design storms. 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.

The Borough of Baldwin must also evaluate its sewer system costs to include improvements which must be made to its Lick Run Sewer Shed as required by a separate Consent Order and Agreement with the DEP. The cost of these improvements must be included in an affordability analysis for the Borough's rate payers. Given the requirements of both orders, the rate payers will be burdened with costs which will probably exceed the affordability threshold.

Sincerely,



John M. Barrett
Borough Manager

CC: Borough of Baldwin Council and Mayor Bennett
Mr. Larry Souleret, Lennon Smith & Souleret Engineering