



# THE BOROUGH OF ETNA

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ETNA, PGH., PA 15223

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Arletta Scott Williams, Executive Director October 17, 2012

Allegheny County Sanitary Authority

3300 Preble Avenue

Pittsburgh PA 15233

## ALCOSAN WETWEATHER PLAN BOROUGH OF ETNA COMMENTS

Dear Ms Williams:

The Borough of Etna is in receipt of the ALCOSAN Draft Wet Weather Plan and respectfully offers the following comments with respect to that document:

1. The ALCOSAN Wet Weather Plan does not appear to consider the \$1.3 million in improvements that Etna needs to make to its own combined sewer system.
2. The ALCOSAN Plan obscures the real program financial impacts by spreading the municipal costs over the whole system where in reality they would fall unevenly depending on the individual system upgrade requirements. Therefore some poorer communities may bear disproportionately heavy financial impacts due to their system upgrades. However this cannot be determined from the ALCOSAN report.

We are concerned about the financial hardship to our community. Based upon the feasibility work performed for the Pine Creek Watershed, Etna would need to invest approximately \$1.3 million in its own system and share a portion of an additional \$40 million in the Etna trunkline capacity improvements with its operating partners. Taken together with the projected 2027 ALCOSAN rates, per household cost would likely range in 2027 from \$1714-2254. This represents a residential indicator from 3.3-4.3%, well over the EPA 2% hardship threshold.

3. The recommended plan only implements some of the facilities of the selected plan. Unless ALCOSAN can control its system and provide conveyance at all points of connection, the Pine Creek communities will not realize the benefits of their investment in upgraded sewer facilities. Does this mean the present conditions in the ALCOSAN system that backup sewage in the Etna trunkline and into the Etna sewers will continue past 2026? In this case any work to increase upstream capacity would result in greater volumes delivered to the ALCOSAN system points of connection and increase the overflows at A-68 and the Etna CSO points. It will also mean that ALCOSAN system will continue to exert a backwater influence and affect the number and duration of Etna CSOs. This will complicate the development of the Borough's own Long Term Control plan required under its NPDES permit.

4. The recommended plan does not address two of the larger points of discharge to the Allegheny River-Washington Boulevard and Pine Creek. These would not be addressed for more than 14 years. It is hard to believe that the conditions leading to the recent tragedy would not be addressed for more than a decade.

5. The alternatives analysis used for secondary satellite plants at Pine Creek and elsewhere do not seem credible. It is difficult to believe that a sewage treatment plant with a peak flow of 20 million gallons per day costs more than \$140 million- even factoring in land costs obtained through condemnation. Our engineers tell us a plant of this size does not come close to being able to treat the Pine Creek peak sewage flow of approximately 100 million gallons per day.

6. We share ALCOSAN's concern on its ability to obtain sufficient funding and successfully manage such a large scale project within a tight time frame. The limited number of contractors nationally with the capabilities to execute large tunnel projects will push prices up.

The plan relies on large tunnels and this creates a high potential for over runs based on the local and national tunnel project experience.

7. ALCOSAN correctly points out that there is insufficient time for implementing the selected Wet Weather Plan. Table 9-80 shows that the ALCOSAN Consent Decree is atypical of the time allowed other metropolitan Wet Weather plans compliance programs. The question is how this region wound up with a compressed schedule after spending million in legal fees in protracted negotiations?

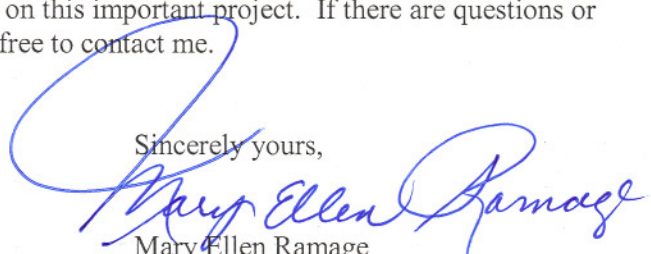
8. We also see in the report that ALCOSAN will be doing water quality monitoring in Pine Creek. This appears to be an acknowledgement of the influence of the ALCOSAN system on the operation of the Etna trunkline and its combined sewer system.

9. The plan schedule leaves the municipal improvements on the same schedule while providing ALCOSAN with relief. The Municipal and ALCOSAN schedule should coordinate rather than run on parallel tracks to ensure the ALCOSAN improvements are in place and fully functional in manner consistent with the municipal program of upgraded collection and conveyance systems.

10. The ALCOSAN plan does not provide an end point for expenditures. If performance standards are not met then additional investment is required. Although the implementation of the plan is said to carry to 2046, the control facilities must be in place by 2026 for SSO control.

The Borough appreciates the opportunity to comment on this important project. If there are questions or you want to discuss our comments further please feel free to contact me.

Sincerely yours,



Mary Ellen Ramage  
Secretary-Manager

Attachments

cc: Council, Etna Borough  
Mayor Rengers  
Donald Newman, P.E.-Buchart Horn