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October 22, 2012

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

Subject: ALCOSAN Draft Wet Weather Plan

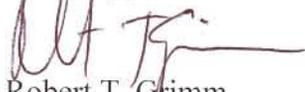
Dear Ms. Williams:

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

1. A joint alternatives analysis performed for the C-45B-04 (Robinson Run) point of connection assumed free discharge to the ALCOSAN system.
  - What, if any, restrictions will exist at the Township point of connection after ALCOSAN completes work within Chartiers Creek?
2. The current leading alternative for Robinson Run is upsized conveyance to ALCOSAN. Will ALCOSAN provide sufficient capacity for all flows conveyed by the Township up to and including the 10-year design storm?
3. If capacity isn't provided by ALCOSAN at the point of connection and the Township moves forward with a convey all alternative, 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 in Robinson Run matches the submission.

5. 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 the Robinson Run sewershed has previously provided ALCOSAN with hydrographs that show the flow rates for 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.
  
6. Currently, the Township has an agreement with ALCOSAN that caps flow. The Township is requesting a meeting with ALCOSAN to discuss how this capped flow agreement could potentially impact alternatives for the Robinson Run sewershed. The portion of the Township currently tributary to ALCOSAN has a significant potential for growth and based upon this capped agreement, it is our understanding that it will cost around \$6.6 million dollars for every 100,000 gallons of additional capacity. Has this cost been incorporated into the DWWP?
  
7. 11 communities 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. Although the Township wasn't part of that consent agreement there is some concern that the Township has regarding that 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,



Robert T. Grimm  
Township Manager