



Township of Scott

Board of Commissioners

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October 17, 2012

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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:

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

- Regarding Tables 9-27 and 9-30 and Sections 3.2 and 3.5, information regarding the Township should be corrected for the following ALCOSAN points of connection:
 - C-30 (Whiskey Run) is identified as a combined sewer sewershed. Neither Scott Township nor Greentree Borough owns, operates or conveys combined sewage flow to this point of connection. All sewers within this shed are separate sanitary sewers.
 - C-31 – This structure appears to be physically located within the Township; however the Township has no areas served and does not convey any sewage flow to C-31. The One Overall Map shows this POC exclusively serving Carnegie Borough.
 - C-41 – This structure appears to be physically located within the Township; however the Township has no areas served and does not convey any sewage flow to C-41. The One Overall Map shows this POC exclusively serving Carnegie Borough.
 - C-44-12 – This structure appears to be physically located within the Township; however the Township does not have any public sewers tributary to C-44-12. It is possible that one or more industrial buildings located within this area may

have service laterals connected to C-44-12 however we cannot confirm that possibility.

- C-45B-04 (Robinson Run) This structure appears to be physically located within the Township; however the Township has no areas served and does not convey any sewage flow to C-45B-04. The One Overall Map shows this POC serves the Robinson Run sewer shed exclusively outside Scott Township.
 - C-45B-08 – This structure appears to be physically located within the Township; however the Township has no areas served and does not convey any sewage flow to C-45B-08. The One Overall map shows this POC serves exclusively areas located wholly within Collier Township.
 - C-51 is identified as a combined sewer sewer shed. The Township does not convey combined sewage flow to POC C-51. The Township sewers tributary to this POC are separate sanitary sewers only. As has been discussed with ALCOSAN on a number of occasions, there is an Allegheny County owned and operated stream enclosure/storm sewer (Vanadium Road) that is directly connected to this POC.
 - C-50A-06 – This structure appears to be physically located within the Township; however the Township has no areas served and does not convey any sewage flow to C-50A-06. The One Overall map shows this POC serves exclusively areas located wholly within Collier Township.
- The Township submitted a draft feasibility study to ALCOSAN for POC's C-48, C-49 and C-53 and also submitted both Preliminary and Final flow estimates for all other points of connection owned and operated by Scott . The analysis our engineer performed for these submissions assumed unimpeded discharge into the ALCOSAN interceptor sewers. As we understand our Service Agreement with ALCOSAN, as well as the Orders issued by the various regulatory agencies, ALCOSAN is obligated to accept all flow Scott delivers to each POC. As an example, the current leading alternative for C-48 (Hope Hollow) is upsized conveyance to ALCOSAN for the 10-year return design storm while ALCOSAN is proposing facilities for the 2-year return design storm. If capacity

isn't provided by ALCOSAN at the point of connection for flows greater than the 2-year design storm and the Township moves forward with a convey all alternative for the 10-year design storm, will ALCOSAN accept responsibility for any overflows that occur at the point of connection or along the Township's sewer system?

- 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 based on number of service connections. It was not clear where this \$530 million dollar value came from. There is a figure provided that shows the proposed municipal projects, however a corresponding table that lists the projects along with the costs for the individual projects would be helpful. With the information provided, it cannot be verified if the value used by ALCOSAN for work proposed in the Township matches what the Township previously submitted. Based upon the information presented in the DWWP, the Borough's share of capital improvements would equal approximately \$10.8 million dollars. The current leading alternatives for the Township in its various points of connection have a projected capital cost of \$13.5 million dollars plus Engineering and Contingency. This differential has a significant impact on User Cost and affordability as it pertains to Scott residents.
- Appendix B of the DWWP presents Average Dry and Wet Weather Flow in gallons per day for each of ALCOSAN's points of connection. Based upon information presented in the DWWP, it is our understanding that this value was obtained by simulating the typical year for each point of connection assuming free discharge and either the assumed or preferred municipal alternative and then dividing the total flow at the point of connection by 365 days. It is suggested that the heading in the table of Appendix B be changed from "Average Dry and Wet Weather Flow (gpd)" to "Average Daily Flow (gpd)". Is it ALCOSAN's intent to establish a capacity allocation and thereby hold the communities tributary to each point of connection to that flow rate? It should be noted that the Township has provided ALCOSAN with peak flow rates, total volumes for various design storms and design storm hydrographs. 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 ALCOSAN DWWP shows that the current municipal costs for an average Scott Township resident is \$82 per year. It is our understanding that ALCOSAN used this value as part of its affordability analysis. It should be noted that the Township covers sewer related expenses from its general fund, which is not reflected in the \$82 presented in the DWWP. Including the cost subsidized by the general fund, the correct amount would be at least \$150 for a total of at least \$412 per year.
- Eleven (11) communities, including the Township, 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**. The ALCOSAN DWWP specifically states that the 2019 deadline will not be met. Further, Scott is planning on delivering the 10 year storm for Hope Hollow. 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. Is ALCOSAN accepting responsibility for any overflows that remain after the 2019 deadline?
- The Township previously provided ALCOSAN alternatives models for C-48 and C-49. It is not clear that this information was used in development of the DWWP. Please respond as to whether or not this information provided by our engineer was used.

Sincerely,



Denise Fitzgerald, Manager

cc: Board of Commissioners
L. Lennon, File