



**WEST MIFFLIN SANITARY SEWER
MUNICIPAL AUTHORITY**

www.wmssma.org

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October 16, 2012

Mr. Tim Prevost, P.E.
Allegheny County Sanitary Authority
3300 Preble Avenue
Pittsburgh, Pennsylvania 15233

Re: West Mifflin Sanitary Sewer Municipal Authority
Formal Public Comments to ALCOSAN Wet Weather Plan

Dear Mr. Prevost:

The West Mifflin Sanitary Sewer Municipal Authority is submitting the following comments in response to the ALCOSAN Wet Weather Plan provided in July 2012. The Authority connects to the ALCOSAN system at Streets Run in the City of Pittsburgh and Homestead Run in the Borough of Munhall. The Authority is extremely concerned regarding the costs of the WWP implementation to its rate payers.

1. Based on our review of the WWP, we do not believe the plan compares the potential long term savings of allowing communities to connect to an existing wastewater treatment plant not owned by ALCOSAN versus constructing improvements to convey all wastewater to the Woods Run facility. The WWP did review satellite treatment alternatives, but did not appear to review use of existing facilities. Based on information we have gathered from attendance at various meetings, it appears that ALCOSAN is adverse to giving up any customers currently in its system and therefore did not review any alternatives where sewage flow with a net loss of even one customer was being treated by another entity. Specifically, the Pittsburgh Water and Sewer Authority owns two pump stations within the Lincoln Place area of the City (Streets Run sewer system) that could inexpensively be conveyed to the Authority's Thompson Run Treatment Plant. The treatment plant has capacity to treat the sewage and is approximately 1 mile from the closest pump station. The Authority trunk sewer is within 100 feet of the pump station. Allowing PWSA to connect the customers to the Authority system would eliminate the need for costly improvements to the pump stations and potentially reduce pipe sizes and improvements proposed by ALCOSAN within the WWP. The WWP plan should look at the optimal projects for the region and not just ALCOSAN since it is being sold as a regional plan.

2. The Authority takes issue with the fact that the WWP does not recommend any improvements in certain areas due to the overall project cost and still does not consider allowing some customers to send sewage to other existing treatment facilities. Specifically, no improvements to the M-49 river crossing are proposed. The Authority, Munhall Sanitary Sewer Municipal Authority, and Borough of Whitaker are being required to spend several million dollars installing a larger pipe to the M-49 point of connection. If ALCOSAN makes no improvements, overflows will still occur. Instead of the overflows occurring upstream along Homestead Run, the overflows will occur at the Monongahela River. This seems like a minimal environmental improvement for millions of dollars in investment. The Authority suggests that by diverting flow to the Authority's Thompson Run Treatment Plant collection system peak flows will be reduced to ALCOSAN's M-49 point of connection and result in a reduction in sanitary sewer overflows to waters of the Commonwealth versus the WWP proposal. The construction of a new pump station and upgrade of the Homeville Pump Station could be completed with the user fees previously paid to ALCOSAN for treatment in lieu of ALCOSAN using the user fees to make WWP improvements that do not benefit the Authority or the local environment.

3. The WWP does not appear to be geared toward identifying the best overall regional approach. The WWP appears to develop a plan based upon conveying and treating all flows from the 83 communities without any real concrete discussions regarding how the decisions of the communities affect the overall plan. Before a final WWP is issued, ALCOSAN needs to sit down with each community or group of communities, review the costs of the improvements associated with each group of communities within the WWP, and attempt to develop a less costly regional solution for the area. It is possible that improvements by the communities could result in significant savings to the ALCOSAN WWP cost. If ALCOSAN agreed to fund all or a portion of these improvements in the communities, the overall plan cost could possibly be reduced.

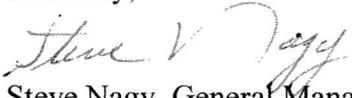
4. The WWP does not appear to address the inequities of spending by the various 83 tributary communities. Although it is a fact that some communities have spent millions of dollars completing improvements and reducing wet weather flows while others have spent almost nothing, ALCOSAN appears poised to distribute costs equally to all ALCOSAN customers. If this is the end result of the plan, some communities will be subsidizing other communities. ALCOSAN's plan for cost distribution is essential to allowing communities to properly review the WWP and must be thoroughly discussed in the WWP.

5. On the issue of future rates, is it the intention of ALCOSAN to charge combined sewer communities the same sewage rates as the separate sewer communities? CSO communities would appear to need larger pipes and infrastructure than the separately sewer communities. The larger pipes are required to handle direct precipitation from these communities and will result in significant capital costs to convey the required flows to ALCOSAN. Although storm water is being conveyed and treated, ALCOSAN rates are based strictly on water usage. Again, separately sewer communities will be paying for improvements needed by combined sewer

communities and will also be paying for maintenance of their own storms sewer system. Why should separate sanitary sewer communities that have to maintain storm sewer systems pay the same as combined sewer communities?

Should you require any additional information regarding the comments and questions listed previously, please do not hesitate to contact me at (412) 466-6070.

Sincerely,


Steve Nagy, General Manager