

Clean Water Plan Update and Proposed Revision

Implementing the Plan

One of the key provisions of ALCOSAN's Modified Consent Decree is to provide adaptive management flexibility when implementing the Clean Water Plan. This permits ALCOSAN to propose changes to the Clean Water Plan as we move through planning, design, and implementation of each project. Proposed changes must be transparently communicated to customer municipalities and the public, providing an opportunity for comment, and submitted to the regulatory agencies for review and approval. This flexibility lets us continuously improve our Plan and adapt to evolving conditions in coordination with our municipal partners.

In 2025, ALCOSAN will be proposing three revisions to the Modified Consent Decree to the regulatory agencies that are parties to the Modified Consent Decree:

1. Eliminate a redundant primary treatment sedimentation tank originally planned as a part of the Woods Run Treatment Plant upgrade to 600 million gallons per day (MGD).
2. Update fecal coliform bacteria sampling and reporting requirements to reflect changes to water quality standards and the availability of local laboratories accredited to perform EPA-approved fecal coliform methods.
3. Update the list of combined sewer outfalls and sanitary sewer outfalls to reflect several outfall closures and incorporate additional outfalls transferred from customer municipalities to ALCOSAN as part of ALCOSAN's Regionalization Program.

Save the Date

Please save the date to hear more about these proposed revisions and other Clean Water Plan updates via a virtual public meeting on Wednesday, February 26th at 6:30 p.m. More information on the proposed CWP revisions and virtual event details will be available on ALCOSAN's website.

Implementing the Clean Water Plan

ALCOSAN and the applicable regulatory agencies anticipated that moving the Clean Water Plan (Plan) from concept to reality would require changes as we progressed through implementation. To account for this evolution, the Modified Consent Decree calls for adaptive management through transparent communication with ALCOSAN's customer municipalities, the regulatory agencies, and the public. ALCOSAN has made substantial progress on the four pillars of our Plan: Regionalization, Green Revitalization of Our Waterways, Regional Conveyance Tunnels, and Wastewater Treatment Plant (Treatment Plant) Expansion.

Figure 1 summarizes the status of the 13 projects that make up the Treatment Plant Expansion program. Six projects are complete, four are under construction, two are in design, and one is complete with design and ready to bid for construction. While ALCOSAN is not planning on any change to the technologies, locations, or sizing of the overflow control projects during 2025, we are discussing with the agencies a revision to one Treatment Plant upgrade project.

Eliminate redundant primary treatment sedimentation tank: ALCOSAN currently has nine primary treatment sedimentation tanks. The Modified Consent Decree currently requires the addition of two more tanks, with one needed to provide a sustained peak flow capacity of 600 million gallons per day (MGD), and the other tank out of service for redundancy purposes. ALCOSAN recently conducted value engineering of the 30% design submittal for the Primary Treatment Sedimentation Tank work package. As a result of this evaluation, the Treatment Plant Expansion Program team thoroughly vetted and recommended that only one additional sedimentation tank would be needed.

For additional due diligence, ALCOSAN assessed six wastewater utilities in the region to better understand wet weather redundancy practices for primary sedimentation tanks that are used infrequently during peak wet weather flows generated by infrequent extreme events. These surveyed utilities do not have redundant primary tanks during wet weather operations. Redundant tanks are not always seen as beneficial because of the limited number of hours when all available tanks are utilized. Based on these insights as well as results from the hydraulic model and simulated stress tests to verify primary tank performance at high flow rates, ALCOSAN has concluded that one additional Primary Treatment Sedimentation Tank provides treatment capacity for 600 MGD peak flow rate, and the redundant tank is not necessary.

Update fecal coliform bacteria sampling and reporting requirements: ALCOSAN's Modified Consent Decree currently requires that water quality samples collected from rivers and combined sewer overflows be analyzed for both *E. Coli* and fecal coliform. ALCOSAN is proposing to eliminate the requirement to sample rivers and combined sewer overflows for both *E. Coli* and fecal coliform and to require *E. Coli* analysis only. This proposal is primarily based on two considerations. First, the number of local laboratories accredited to analyze for fecal coliform using EPA-approved methods is limited. In addition, the Pennsylvania Department of Environmental Protection (PADEP) revised its swimming season water quality criteria in 2020 to be based on *E. coli* instead of fecal coliform.

On a related note, the Modified Consent Decree also requires that ALCOSAN's Overflow Response Plan include monitoring and notification of fecal coliform levels and that its public notification and outreach activities include web site reporting of fecal coliform levels at sensitive areas. For these reporting

requirements, ALCOSAN is proposing that either fecal coliform or *E. Coli* monitoring and/or reporting be allowed.

Update the List of Outfalls: ALCOSAN’s Modified Consent Decree includes a list of combined sewer outfalls (Appendix A) and sanitary sewer outfalls (Appendix B) for which the Modified Consent Decree requirements apply. ALCOSAN is proposing to remove the following four outfalls from those lists to reflect its progress on closing outfalls so they can no longer discharge to rivers: two combined sewer outfalls (A-55 and A-63) and two sanitary sewer outfalls (T-33 and TR-03). In addition, ALCOSAN is proposing to add to the Modified Consent Decree a number of outfalls which have transferred from customer municipalities to ALCOSAN as part of ALCOSAN’s Regionalization Program, plus other, similar transfers that occur in the future. At this time, the outfalls to be added to the lists in Appendix A and B of the CD include:

Outfall Type	No. of Outfalls to be Added	Outfall ID	Municipality Transferred From
Combined Sewer Outfalls	2	OF0102F01, OF0102F02	Carnegie Borough
	6	OF0167N12, OF0167B18, OF0222P04, OF0167A09, OF0221L01, OF0167N12	Borough of Etna
Sanitary Sewer Outfalls	1	OF0317J02	Bethel Park Municipal Authority
	1	OF0861M05	Monroeville Municipal Authority
	4	OF0432C04, OF0432H08, OF0434E02, OF0222N12	Shaler Township
Total	14		

What’s Next?

More information on Clean Water Plan progress and the proposed revisions will be provided at an upcoming virtual public meeting on Wednesday, February 26th at 6:30 pm.

Link to join Webinar

<https://www.alcosan.org/news-and-events/calendar-of-events/calendar/2025/02/26/default-calendar/public-meeting-2025---virtual>

ALCOSAN will request regulatory agency approval for these proposed CWP revisions. While these revisions pertain to the Treatment Plant Expansion, certain sampling events and an administrative matter, other aspects of our Plan remain unchanged. By continuing to work together on all aspects of the Plan, we will continue to adapt to changing conditions and pursue opportunities to more cost effectively achieve our goals to reduce overflows and improve water quality.

We look forward to your participation in the public meeting and hearing your comments. You may also contact ALCOSAN’s Director of Engineering and Construction, Kimberly Kennedy at Kimberly.kennedy@alcosan.org or 412-734-6254 with any questions or concerns you may have.

Figure 1: Wastewater Treatment Plant Expansion Construction Progress

