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October 18, 2012
C-17749-1217

ALCOSAN
3300 Preble Avenue
Pittsburgh, PA 15233

ATT: Tim Prevost, P.E.
Manager of Wet Weather Programs

RE: Comments to the ALCOSAN Wet Weather Report
Borough of Thornburg

Dear Tim,

On behalf of the Borough of Thornburg we reviewed the ALCOSAN Wet Weather Report, we have the following comments:

1. Section 1.3 Page 1-9 reads as follows – “This WWP addresses the elimination of sanitary sewer overflows and the control of combined sewer overflows from ALCOSAN’s Conveyance and Treatment Systems, including overflow structures located at the points of connection with the municipal collection systems. The Plan does not directly address the elimination or control of overflows within the municipal collection systems. However it provides for the hydraulic capacity to accept additional wet weather flows from the municipalities which may be conveyed to the ALCOSAN Conveyance and Treatment System pursuant to municipal feasibility studies to be complete under separate compliance orders”

Comment: The affordability analysis indicates that not all projects can be completed under the Selected Plan, and therefore not all connections from the municipal systems to the ALCOSAN system will be updated. How will additional flows sent to ALCOSAN be handled if the Municipalities update their systems, but ALCOSAN does not?

2. Section 9.3.3 Page 9-80 reads as follows – “In some cases, even after the follow-through coordination was completed, information from a particular municipality was still incomplete, was judged to be unreliable or a preferred control strategy could not be clearly identified. In these cases, the basin planner assumed a control strategy, assumed a level of control and the associated costs, and/or identified areas within the existing municipal sewer system that had adequate hydraulic capacity to convey peak wet weather flow to the ALCOSAN system and where no capital improvements or control facilities were required.” This same assumption is stated throughout the report.



Comment: The report states that POC C-20-02 and C-21 are assumed control strategies. POC C-20-02 only contains a few commercial buildings in Thornburg that are serviced by a privately owned and maintained sewerline, and thus no projects are anticipated. For C-21, please refer to the previously submitted letter dated July 2011 in which the Borough of Thornburg indicated that they will be conveying all flow to ALCOSAN and will be expending \$15,000 to convey these flows. To date, these proposed repairs have already been completed so that no additional projects are proposed in Thornburg under the Feasibility Study.

3. Section 10.8 Page 10-54 indicates that the wet weather treatment facility at will be installed in Crafton Borough. The report reads "...Flows in excess of the RTB's 118 MGD treatment capacity will be shunted around the RTB without disinfection, discharging to Chartiers Creek through a new outfall which also conveys the RTB's treated effluent. Untreated overflows will occur no more than four times in the typical year."

Comment: How many times is it anticipated to overflow a year? How will the odor and noise at the recreation facility and surrounding homes be controlled? Could this cause additional flooding to the recreation facility based on increase flow to the area?

4. Section 11 indicates throughout that Municipalities will start construction immediately following the approval of the Feasibility Plans.

Comment: If the Municipalities complete their construction projects prior to ALCOSAN's projects, how will the additional flows be handled? If ALCOSAN's line cannot (due to not being constructed or not being part of the Recommended Plan) accept the flows, Municipal flows could create new hydraulic issues to their systems or downstream Municipalities.


5. We understand that no construction is proposed in Thornburg by ALCOSAN other than a modification to the C-26 regulator structure.
6. In the Financial Analysis section, ALCOSAN assumes a \$210 per year cost for Municipal projects resulting in a residential indicator of 0.6%. As stated above, there are no additional construction projects planned in Thornburg under the Feasibility Study, so this number should be zero. The residential indicator is based partially on user rates, and operation and maintenance costs are paid through local taxes rather than sewage bills in Thornburg, thus resulting in a lower residential indicator than what an indicator based on actual costs would represent. This will be further refined and explained in the financial section of the Thornburg Feasibility Study.



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If you have any questions or need clarification, please do not hesitate to contact us.

Sincerely,
THE GATEWAY ENGINEERS, INC.



Ruthann L. Omer, P.E.
Project Manager – Feasibility Study

cc: Thornburg Council
Bryan Flaugh, Borough Engineer
Thornburg Solicitor

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