PHASE I INTERIM FLOW REDUCTION CONSENT ORDER

Frequently Asked Questions

ALCOSAN has determined that its $3.6 billion dollar Wet Weather Plan which was submitted in January 2013 is not affordable for the region. In addition, public comments requesting the evaluation of green stormwater infrastructure (GSI) (also known as "GI") opportunities have led to an opportunity for a phased approach for the ALCOSAN Service Area to affordably achieve water quality goals. In EPA's June 2014 meeting with ALCOSAN Customer Municipalities in Pittsburgh, EPA stated that it would consider modifying the Consent Decree, if among other initiatives, the region worked toward regionalization of the system and established flow targets to encourage system rehabilitation and source reduction strategies that can include GSI.

With the expiration of their existing consent orders, the majority of the ALCOSAN Customer Municipalities have requested an extension of their existing orders. The local regulatory agencies - the Pennsylvania Department of Environmental Protection (PADEP) and the Allegheny County Health Department (ACHD) are drafting a new Interim Consent Order rather than an extension to enable municipalities to investigate flow reduction. One of the purposes of the Interim Consent Orders is to allow the ALCOSAN Customer Municipalities to identify the most cost effective locations in their sewer systems to target improvements to reduce groundwater infiltration and/or the inflow of stormwater. System efficiencies to eliminate excess flow wherever feasible and cost effective are the foundation for a sustainable regional wet weather plan. Therefore, PADEP distributed two letters in response to the municipalities' request for additional time to evaluate source reduction options.

The March 27, 2015 letter was sent by PADEP to all ALCOSAN Customer Municipalities and Authorities setting forth a procedure to provide additional time to explore flow reduction opportunities (the Phase I Interim Consent Order). The April 1, 2015 PADEP letter was sent to only sanitary sewer system communities and hybrid communities (communities with both sanitary and combined systems) and addressed how new connections or taps to sewer collection systems subject to a Corrective Action Plan (CAP) will be controlled until a new COA or ACO is requested by a municipality and executed. This "FAQs" document provides municipalities with additional information to clarify the Interim Flow Reduction Consent Order process and goals. The FAQs will be updated as needed throughout the process, so you should check the Interim Municipal Consent Orders page on the 3 Rivers Wet Weather website to make sure that you have the most current version.

This document is a product of the 3 Rivers Wet Weather Program. It does not represent a final action, adjudication or regulation of PADEP. Nothing in this document affects the statutory and regulatory obligations with which ALCOSAN and its Customer Municipalities are bound to comply. This document reflects the current thinking of PADEP as it finalizes terms and conditions of a Phase I Interim Consent Order with Customer Municipalities of ALCOSAN. PADEP reserves the right to revise its negotiation position for any reason and is not legally bound by the representations in this document.

1. **What is the difference between source reduction and flow reduction, and how do they relate to flow targets?**

Source reduction (source control) includes methods to reduce stormwater inflow entering combined sewer systems, "CSS" (by using GSI) also known as "GI," and methods to eliminate infiltration and inflow. These methods include, but may not be limited to: sewer separation; bioretention; pervious pavers; downspout disconnection, stream or seep removal, and/or methods to reduce or eliminate groundwater infiltration into a collection system such as: private lateral testing upon resale ordinances; sewer pipe lining and sewer replacement projects. Some of these approaches may also be appropriate for source reduction within sanitary sewer systems, "SSS." So very simply, source reduction is a sustainable way to reduce flows. *Flow reduction* is the decrease in flows in the regional sewer collection system pipes by utilizing source reduction (source control) GSI or other strategies.

Flow targets are limits on municipal wastewater and wet weather flow that is allowed.

2. **Why the emphasis on Green Infrastructure when comparative construction costs are in most cases significantly higher than grey infrastructure? In addition, GI maintenance costs, although not yet conclusive, appear to be significantly higher and the long term sustainability of Green Infrastructure has not yet been proven.**

Many ALCOSAN Customer Municipalities and residents within the ALCOSAN service area requested the opportunity to evaluate GSI options for the sewer system. The Environmental Protection Agency and PADEP continue to encourage and support the implementation of green stormwater infrastructure, where it is cost-effective and appropriate. Other cities have integrated GSI into their overall wet weather plans to some extent. GSI provides additional benefits, such as improved water quality due to reduced volumes of stormwater to receiving streams and the filtration and uptake of pollutants by soil and plants. Also, green infrastructure can serve as an impetus to revitalize and beautify neighborhoods. A life cycle analysis may show that green infrastructure makes a significant contribution to a cost effective and sustainable wet weather plan in the region, as stormwater is infiltrated near where it falls, rather than conveyed, pumped, and treated. These "Triple Bottom Line" benefits – environmental, social, and economic should be considered when evaluating green vs. grey alternatives. It has been shown that grey infrastructure often provides the more cost-effective solution to reliably capture and safely convey stormwater and wastewater for treatment. However, there is great value in consistently evaluating the appropriateness of green stormwater infrastructure in landscape and engineering designs.

3. **If Source Reduction was studied and considered during the development of the Feasibility Studies and determined not to be feasible, cost effective and/or affordable, does the issue need to be revisited? If so, why?**

For the Source Reduction Study required by the Phase I Consent Orders, Municipalities can use information collected to develop their Feasibility Studies under prior consent agreements. However, Municipalities must re-evaluate that information in light of current conditions and the requirements of

the Phase I Flow Reduction Consent Orders. By way of example, source reduction alternatives developed under the Feasiblity Studies might be impacted by the regionalization of trunk sewers by ALCOSAN or the high costs ALCOSAN projects for the construction and maintenance of storage facilities for excess flow conveyed to it by the Customer Municipalities.

4. Why has PADEP reversed its initial position on Source Reduction from that at the time of issuance of the original Consent Orders?

ALCOSAN has determined it cannot affordably manage the system's existing wet weather flows it receives from its Customer Municipalities. EPA noted in a June 2014 meeting with the municipalities that regionalization, source reduction, green infrastructure, and flow targets are paths forward which the region may use to achieve water quality standards. These approaches may be used to lower the regional compliance cost below the $3.6 billion estimated by ALCOSAN to meet receiving water quality and compliance requirements for its service area. In addition, municipal and public comments (relative to the grey infrastructure proposals within the Wet Weather Plan) requested the evaluation of GSI.

5. How can municipalities do any planning without knowing the specific amount of flow reduction that they need to achieve?

Municipal flow targets will be essential as regional wet weather planning moves forward. To prepare and inform their source reduction planning practices in preparation for pending flow targets, municipalities will be required to implement a pilot or demonstration project(s) in the Phase I Interim Consent Order such that they can then evaluate potential strategies to meet pending flow targets. In this interim period PADEP recommends that municipalities begin planning immediately for municipal-wide opportunities to meet future flow targets which are consistent with their evaluation of source reduction strategies, including GSI related projects.

6. ALCOSAN has been engaged in a study of source control as part of its wet weather planning. How will this be integrated into municipal source reduction planning?

ALCOSAN will continue to coordinate with its Customer Municipalities to provide them with potential source reduction opportunities that have been identified as part of their Source Control Study. This study evaluated source reduction opportunities for both combined and sanitary sewer systems. ALCOSAN's municipal contact for coordinating source control strategies is Timothy Prevost. He can be reached at either 412-734-8731 or at timothy.prevost@alcosan.org.

7. What is the schedule for the Phase I Interim Consent Order?

PADEP anticipates it will provide municipalities with a draft Phase I Interim Consent Order sometime after June 2015. Municipalities will have a limited time for review and discussion with PADEP on the draft Phase I Interim Consent Order. Following its finalization, municipalities may enter into a Phase I Interim Consent Order where they will have 18 months to evaluate their source reduction strategies. At the end of this 18-month period, municipalities will submit a Source Reduction Study (SRS) report to PADEP identifying priority source reduction areas and projects. When possible the source control goals and related projects should be discussed and coordinated with ALCOSAN and the PADEP. Additional details and clarifications concerning this report submission will be included in the Draft Phase I Interim Flow Reduction Consent Order.

8. PADEP's March 27, 2015 letter to the municipalities regarding the Interim Consent Order talks about both a GSI or Source Reduction Study and a GSI Plan and Implementation Schedule. Are these different submittals?

The Source Reduction Study report (or GSI Plan) is the actual deliverable to be submitted to PADEP at the end of the 18-month period set forth in the Phase I Interim Consent Order. The municipalities and ALCOSAN will use the Source Reduction Study findings and report during the Phase II Consent Order to develop an Implementation Schedule intended to meet the appropriate flow targets.

Below is a summary of the required actions:

Phase I Interim Consent Order for Combined Sewer Systems and Hybrid Sewer Systems (having both Combined and Sanitary Systems):

- At the end of the 18-month period submit to PADEP a Source Reduction Study report identifying priority source reduction projects or approaches for the entire municipality including GSI projects (see example source reduction opportunities in FAQ#1) that could be implemented to meet flow targets, to achieve compliance with the CSO Policy and/or to eliminate SSOs.
- The Source Reduction Study should include an implementation schedule and predict anticipated flow reductions across the municipality.
- During the 18-month period, complete implementation of at least one pilot GSI source control project to demonstrate that such projects in your municipality will likely meet predicted reductions in CSO and/or SSO volumes.
- As part of the Source Reduction Study, report on the efficacy of the pilot project(s) toward meeting the previously developed flow reduction estimates and ultimate flow targets.
- Continue to address incomplete obligations under the previous COA.
- Continue to implement Nine Minimum Controls.

Phase I Interim Consent Order for Sanitary Sewer Systems:

- At the end of the 18-month period submit to PADEP a Source Reduction Study identifying priority source reduction projects or approaches for the entire municipality, which can include

GSI projects (see example source reduction opportunities in FAQ#1) that could be implemented to meet flow targets and to minimize or to eliminate SSO volumes.

- The Source Reduction Study should include an implementation schedule and predict anticipated flow reductions across the municipality.
- During the 18-month period complete implementation of at least one pilot source control or flow reduction project to demonstrate that such projects in your municipality will likely meet predicted reductions in SSO volumes. The pilot source control project may include a GSI project.
- As part of the Source Reduction Study, report on the efficacy of the pilot project(s) toward meeting the previously developed flow reduction estimates and ultimate flow targets.
- Continue to complete obligations under the previous ACOs.
- Continue implementation of previously submitted Operations and Maintenance Program Plan.

9. Can communities get credit for the source reduction pilot project requirement of the Interim Flow Reduction Consent Order for their implementation of GSI, private lateral programs, or other stormwater and source flow reduction projects that are either currently underway or were recently completed?

The Regulatory Agencies will consider this request. For example, if you had implemented a time of sale lateral test and repair inspection program, this may be considered a Source Reduction pilot project for the Phase I Interim Consent Order. In selecting a source reduction pilot project municipalities are encouraged to build upon results of earlier studies, provided there have not been significant changes to the conveyance system in the area of the study. Municipalities can identify a pilot project by using data from recent flow isolation studies that were performed as part of the Municipal Feasibility Studies. Both the 2008 flow monitoring data on the 3RWW MDS site and consultation with ALCOSAN are also good starting points for identifying areas of high I/I flow that may be candidates for pilot source reduction projects. Also, please note that these same references can also be used by a municipality to identify areas of excessive I/I and high flows for inclusion in the more comprehensive Source Reduction Study, which is due at the end of the Phase I Interim Consent Order.

10. Is a Private Residential Lateral/Inspection Ordinance for Time of Sale acceptable as a Corrective Action Plan? To what extent into the private system would the inspection be required? To clean out, or beyond into foundation drains? What consideration is given to property owners about affordability and cost effectiveness of lateral and associated repair requirements?

A lateral program utilizing a time of sale lateral inspection and repair ordinance would not be acceptable alone as a CAP, but could satisfy the source reduction pilot program for the Phase 1 Interim Consent Orders. Flow isolation programs may be useful to identify lateral sources in very wet portions of the collection system. Additionally, programs to evaluate laterals beyond the building foundation walls, including high infiltration areas of the public sewer system, should be evaluated for the cost to implement potential flow reduction efforts.

11. We will need to work with our neighboring muncipalities for our flow reduction study. Is this allowed?

In most cases, multi-municipal studies/projects will be allowed and encouraged. In our region's conveyance system, municipalities are often hydraulically connected. Source reduction projects in upstream pipes can reduce the flow to downstream neighbors, and can reduce the number and volume of sewer overflows. Likewise, downstream projects can also often benefit upstream communities by providing capacity in the pipes to convey their flow to prevent backups and overflows. Municipalities may have developed multi-municipal flow management strategies as part of the Feasibility Study development. PADEP will allow multi-municipal coordination in such circumstances so long as the project(s) coordination does not delay the implementation of the pilot project and the subsequent submission of the Source Reduction Study report 18 months from the execution of the Phase I Interim Consent Order.

12. Does the municipal pilot GSI project have to be on public property?

It is highly recommended that municipalities locate the pilot GSI projects on public property, such as along roads, municipal parking lots, or parks. This will not only streamline the construction process, but also provide the municipality with access to the site in order to maintain the GSI.

However, pilot GSI projects on commercial properties may also be considered. One advantage is that construction might be partially paid for by a private entity. Responsibility for ownership and long-term O&M agreements will be needed to ensure the project is implementable and to ensure the long-term viability of the GSI projects implemented on private property. These source reduction proposals may need special approval by PADEP. For municipal GSI projects, the long-term maintenance plan for the GSI project must be included in the Source Reduction Study. Either the private entity could commit to a long-term maintenance agreement (with a covenant for future property owners), or they could turn over the maintenance to the municipality, if this is agreeable to all parties.

Note that construction of GSI is generally more cost-effective during the development or redevelopment of a site, or during road reconstruction, rather than as a retrofit. With this in mind, municipalities may want to review their codes and ordinances to ensure that developers are encouraged to integrate GSI into their projects. The impact of revisions to codes and ordinances on flow reductions may be included in the assessment of source reduction projects in the Source Reduction Study, which is due 18 months after execution of the Phase I Interim Consent Order.

13. Will PADEP provide feedback on the Source Reduction Study and GSI Pilot project submitted by Customer Municipalities?

Per the March 27, 2015 PADEP letter to municipalities, for combined sewer municipalities, a Source Reduction Study and a pilot GSI project are required during the term of the Phase I Interim Flow Reduction Consent Order. Sanitary sewer municipalities will also be responsible for completing a Source Reduction Study as well as one or more interim flow or source reduction projects. Sanitary

municipalities, at their option, may implement a pilot GSI project to satisfy the requirement to implement an interim flow or source reduction project. PADEP is willing to review and comment upon a proposed pilot GSI project or an interim flow or Source Reduction Project. Additionally, municipalities should review the GSI Pilot project and interim flow or Source Reduction Study with ALCOSAN personnel to inform ALCOSAN of the developing source control strategies and maximize potential cost savings.

14. Many Municipalities submitted their requests for extensions to the current Consent Orders based upon coordinating work with ALCOSAN, the Long Term Control Plans, Regionalization and protection from Third Party Lawsuits. If a Municipality does not desire to evaluate Source Reduction and/or Green Infrastructure beyond what was performed for the Feasibility Studies do they need to formally advise PADEP that they no longer wish to be included in a Part I Extension?

No, the opportunity for municipalities to evaluate source reduction strategies through an 18- month Phase I Interim Consent Order is optional, however municipal tap control and tap connection authorizations by a municipality will not be allowed unless the Customer Municipality enters into an Interim Consent Order. If a municipality does not choose to enter into an Interim Consent Order, a CAP must be submitted to PADEP. If the Customer Municipality does not execute a Phase I Interim Consent Order or submit a CAP, an enforcement action may be taken.

15. Has PADEP reviewed and/or commented on any of the Feasibility Studies submitted to them as required under the Consent Orders by July 31, 2013?

The Allegheny County Health Department has extensively reviewed the Feasibility Studies submitted under the prior Administrative Consent Orders and provided a letter to municipalities acknowledging receipt of the studies. The regulatory agencies plan to consider these Feasibility Studies under its Chapter 94 program implementation role and to consider the Feasibility and Source Reduction Studies during development of the Phase II Consent Orders. The information in the Feasibility Studies continues to be used by the agencies and by ALCOSAN to inform regional planning efforts, where the Feasibility Studies have been found to be essential and relevant. The data (e.g. flow isolation studies or other flow monitoring) can be used to identify areas of excessive I/I and high flows for source reduction or GSI pilot projects, for inclusion in the Source Reduction Study, which is required by the Phase I Consent Order. In addition, municipalities may have developed multi-municipal flow management strategies as part of the Feasibility Study development. There may be other information within the Feasibility Studies that might be useful to meet the requirements of the Phase I Consent Orders.

ALCOSAN will use both the Feasibility Studies and Source Reduction Studies to inform updates to its regional Wet Weather Plan and consider flow reduction volumes and flow target management strategies developed by Customer Municipalities. The Municipal Feasibility Studies will be used in the planning process for the regionalization of the trunk sewers. Under the principles of the transfer agreements, if ALCOSAN finds more cost effective regional approaches, it will be in everyone's interest to amend existing Feasibility Studies.

16. How will the Regulatory Agencies track the completion of the incomplete obligations under the previous COAs and ACOs by the Customer Municipalities, which expired on March 30, 2015?

PADEP and ACHD track and address incomplete obligations with the individual municipalities. Customer Municipalities with CSS will need to continue to document in their annual CSO report to the Regulatory Agencies that they are implementing Nine Minimum Controls. SSS Customer Municipalities will need to continue to submit their annual update to ACHD regarding their continued implementation of their Operations and Maintenance Program Plan in their March O & M updates.

Note that it is likely that the new Phase I Interim Consent Orders will have reporting requirements, as well.

17. What is the schedule for the Phase II Consent Orders?

During the Phase I Interim Consent Order, the PADEP and the municipalities will negotiate the provisions of the Phase II Consent Orders. These will be new Consent Orders that will be coordinated with the requirements of the Federal Amended Consent Decree that the Regulatory Agencies and ALCOSAN are currently negotiating. As EPA indicated in the July 2014 meeting with the municipalities, the new Consent Orders and the revised ALCOSAN Wet Weather Plan will likely have provisions for municipal flow targets.

18. How will municipalities coordinate the GSI or Source Reduction Study and the implementation of the projects?

3 Rivers Wet Weather will provide an on-going forum to provide general guidance and information through its regular (monthly or bi-monthly) Wet Weather Working Group Meetings. In addition, it is anticipated that ALCOSAN will be developing a funding program to incentivize some municipal source reduction projects.

19. Is there a comparison of available flow data at the ALCOSAN WWTP from prior to the implementation of work under the current Consent Orders and the current time period that would provide indication of flow reduction, if any?

To PADEP's knowledge no comparison has been done. However, while comparing ALCOSAN's flow data at the WWTP pre- and post- flow reduction measures has some merit, Point of Connection (POC) data may provide a more targeted evaluation of municipal efforts and perhaps a preferable standard to determine reductions in flow. POC data is better able to isolate data for a geographical area, and since meters are placed upstream of the outfalls, removes the variability due to, for example, weir adjustments and river inflow. PADEP recommends Customer Municipalities accept ALCOSAN's offers to help municipalities plan, develop and coordinate flow reduction and GSI plans. These plans and

discussions may include various flow monitoring and flow evaluation programs appropriate for the Source Reduction Study.

20. How will the information in the Feasibility Studies that the municipalities completed in June 2013 be used?

To the extent Feasibility Studies identified areas of high I/I or excessive flows, the results of the studies can be used to identify the GSI Pilot Project as well as any interim source or flow reduction project required by the Phase I Consent Order. Also the Feasibility Studies can be used to develop the 18-month Source Reduction Study report due at the end of the term of the Phase I Consent Orders. In addition, there may be other information within the Feasibility Studies that might be useful to meet the requirements of the Phase I Consent Orders.

Furthermore, ALCOSAN will use both the Feasibility Studies and the GSI and Source Reduction Studies to inform updates to its regional Wet Weather Plan and account for flow reduction volumes and flow target management strategies as established by Customer Municipalities. The Feasibility Studies will also be used in the planning process for the regionalization of the trunk sewers. Under the principles of the transfer agreements, if ALCOSAN finds more cost-effective regional approaches, it will be in everyone's interest to amend existing Feasibility Studies. Plan to contact Mike Lichte of ALCOSAN to discuss any source or flow reduction project that may impact regionalized facilities. Mike can be reached at 412-766-8004 or at michael.lichte@alcosan.org.

21. What are examples of projects that can be evaluated by municipalities in their GSI or Source Reduction Studies?

Combined Sewer Systems should evaluate practices in the Pennsylvania Stormwater Best Management Practices Manual - http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-8305 as well as opportunities to eliminate groundwater infiltration. Sanitary Sewer Systems should evaluate Infiltration/Inflow elimination programs. This might include flow isolation studies, sewer lining or replacement projects, private lateral replacement programs, or private lateral testing upon resale ordinances. Both types of systems should look at the benefit and feasibility of removing streams and seeps from their systems. See FAQ # 1 for more information.

22. What if a municipality doesn't sign the Phase I Interim Consent Order?

Sanitary Sewer Systems will be subject to a Corrective Action Plan (CAP) and Tap restrictions under Chapter 94 of PADEP's regulations. Combined Sewer Systems may be evaluated for compliance with the CSO Control Policy.

23. If significant expenditures have been made under the terms of the Consent Orders to improve the system, why then does a Municipality need to submit a CAP and have PADEP issue Taps? Why would it not be permissible to continue Self-Regulation of Taps?

As long as there are wet weather overflows within the municipal system or at the point of connection to ALCOSAN, DEP regulations will require a Corrective Action Plan; unless the municipality signs the Phase I Interim Consent Order.

24. If a CAP is to be required under the Part II Consent Order, then what is the need to extend the current Orders?

The Customer Municipalities requested the extension of the current Orders. Those communities stated that they wanted to continue to self-regulate taps under specified conditions and to obtain some legal protection against third party law suits. Without an Interim Phase I Consent Order, Customer Municipalities will lose both of these benefits.

Also without a Phase I Consent Order, under the requirements of Chapter 94 of PADEP's regulations, each Customer Municipality that causes or contributes to a hydraulic overload must submit a CAP. Those regulations are self-implementing (i.e. the Customer Municipality must comply with Chapter 94 even in the absence of specific notice from PADEP). The Phase II Consent Orders will require municipal participation and cooperation with ALCOSAN to implement the regional long-term Wet Weather Plan.

25. If my community is subject to a Corrective Action Plan (CAP), how do I comply with the Phase I Interim Consent Order?

Per PADEP's April 1, 2015 letter to Sanitary and Hybrid System communities, you will have until August 1, 2015 to either submit a CAP that includes flow reduction projects and the identification of long term remedies to eliminate all illegal discharges and hydraulic overloads within the municipal system, which may include the submission of a Part II Permit for the construction of additional facilities or to execute a new Consent Order. The August 1, 2015 deadline may be extended for a short period of time, likely to September 1, 2015. Between now and September 1, you will need to submit requests for additional connections to PADEP for approval on a case-by-case basis.

26. Could a sanitary sewer community that doesn't have development pressure choose to neither sign the COA or have a CAP?

If the customer municipality chooses not to have a CAP, they will need to enter into a Consent Order or an enforcement action may be taken.

27. If we need additional guidance or have questions, whom should we contact?

Initially, please contact 3 Rivers Wet Weather. 3RWW will provide an on-going forum to provide general guidance and information through regular semi-monthly Wet Weather Working Group Meetings. This group will gather and organize all comments from the Customer Municipalities. After collecting comments, a designated sub-committee of the customer municipalities work groups organized by 3 Rivers Wet Weather, will discuss any questions with appropriate personnel from PADEP. If you think you have questions unique to your municipality, you can contact Chris Kriley, Program Manager of the Pennsylvania Department of Environmental Protection's Clean Water Program, at (412) 442-4312, or by e-mail at ckriley@pa.gov.

28. In planning flow reduction and green stormwater infrastructure projects, it is useful for municipalities to know the multi-municipal trunk sewer lines that will be included in the trunk sewer regionalization. If a relevant trunk sewer transfer transaction isn't finalized within the 18-month study period for the Source Reduction Study, how do municipalities plan around this?

PADEP and ACHD recognize that the current regionalization initiatives, while essential to the effective management of the ALCOSAN conveyance system, add additional considerations to the source reduction planning efforts. ALCOSAN has indicated that the complete review of all of the data associated with the transfers may not be completed until the end of 2016. However, reaching agreement concerning the specific segments of trunk sewers to be included in a multi-municipal transaction with ALCOSAN can occur early in the information exchange process between the respective municipalities and ALCOSAN. Therefore the municipalities and ALCOSAN are encouraged to review and finalize the maps of the proposed multi-municipal trunk sewer to be transferred as promptly as possible.

29. If ALCOSAN and the Municipalities have committed to Trunk Sewer Takeover by ALCOSAN, but have not completed all legal issues by the time of the issuance of the next Consent Orders, will PADEP recognize on a temporary basis a Memorandum of Understanding or some other legally binding document?

PADEP acknowledges that system efficiencies gained by regionalization have the potential to make a large impact on reducing source flow and should be concurrently considered in all aspects of the regional wet weather planning. PADEP will continue to stay informed by ALCOSAN regarding the status and extent of the regionalization initiatives. Municipalities should make note in their Source Reduction Study, as appropriate, the locations where regionalization may impact their anticipated flows.

30. Will Future Consent Orders for the Municipalities/Authorities and Future ALCOSAN Consent Decrees be negotiated simultaneously?

Although the local regulatory agencies cannot dictate to the EPA what it should do, the local regulatory agencies anticipate that the development of the Phase II Orders will be coordinated with the requirements of an Amended Federal Consent Decree with ALCOSAN.

SUMMARY OF FLOW REDUCTION CONSENT ORDER PROCESS WITH ESTIMATED TIMELINE

(Check for latest version of the FAQs on the 3RWW Website for updates)

Activity	Timeline
PADEP provide draft Phase I Interim Consent Order to municipalities	By July 2015 (estimated)
Municipalities review and negotiate draft Phase I Interim Consent Order	July – November 2015 (estimated)
ALCOSAN provide municipalities with information from their Source Control Study	July 2015 (estimated)
Phase I Interim Consent Order	Implemented December 2015 (estimated) with a duration of 18 months.
Systems subject to a Corrective Action Plan (CAP) submit a CAP to PADEP that includes flow reduction projects or execute a new COA or ACO.	September 1, 2015
PADEP provide draft Phase II COA/ACO to municipalities	September 2016 (estimated)
Municipalities review and negotiate draft Phase II COA/ACO – 120 days	September –December 2016 (estimated)
Municipalities submit their GSI or Source Reduction Study and Implementation Schedule to PADEP	18 months from implementation of Phase I Interim Consent Order - June 2017 (estimated)
CSS and SSS municipalities implement one or more flow reduction or GSI projects during the term of the Phase I Interim Consent Order	18 months from implementation of Phase I Interim Consent Order - June 2017 (estimated)
Regulatory review of Municipal GSI or Source Reduction Study. Provide approval of GI/Source Reduction Pilot projects.	December 2017 (estimated)
Phase II COAs/ACOs	Implemented March 2018 (estimated)

RESOURCES	
(Check for latest version of the FAQs on the 3RWW Website for updates)	
http://www.alleghenycountyswmp.com/Home	Allegheny County Phase I Stormwater Management Plan – Report provides a map which identified stormwater problem areas.
http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-8305	Pennsylvania Stormwater Best Management Practices Manual
http://mds.3riverswetweather.org/ - Note that MDS portion of the website will require you to complete a link on the website to request access	3 Rivers Wet Weather 's Website – Go to Municipal Data Support, Wet Weather Information for guidance documents and tools related to Source Flow Reduction Cost-Effectiveness Analysis, 2008 Regional Flow Monitoring Data, etc.
http://www.3riverswetweather.org/storm-water-green-solutions	3 Rivers Wet Weather 's Website – Stormwater and Green Solutions for many Green Infrastructure Resources
http://water.epa.gov/polwaste/green/	EPA Low Impact Development Website
http://water.epa.gov/infrastructure/greeninfrastructure/index.cfm	EPA Green Infrastructure Website
http://www.cwp.org/online-watershed-library/cat_view/64-manuals-and-plans/80-urban-subwatershed-restoration-manual-series	*Manual 3: Urban Stormwater Retrofit Practices Manual. Urban Subwatershed Restoration Manual Series.* Center for Watershed Protection, Ellicott City, MD. Schueler, T., Hirschman, D., Novotney, M., Zielinski,J. 2007. This Center for Watershed Protection guidance manual outlines the basics to develop an effective stormwater retrofit program. Information is provided on the different types of retrofits in urban subwatersheds, assessment methods, costs and pollutant removal data for stormwater treatment options.
http://www.cwp.org/online-watershed-library/cat_view/64-manuals-and-plans/80-urban-subwatershed-restoration-manual-series	*Urban Stormwater Retrofit Practices Appendices.* Urban Subwatershed Restoration Manual Series. Center for Watershed Protection, Ellicott City, MD. Schueler, T., Hirschman, D., Novotney, M., Zielinski, J. 2007. The Appendices to the Urban Stormwater Retrofit Practices that is a Center for Watershed protection guidance manual that outlines the basics to develop an effective stormwater retrofit program.