west virginia department of environmental protection

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Harold D. Ward, Cabinet Secretary
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MEMORANDUM

To: Marie Prezioso, Chair
Meredith J. Vance, Director, Environmental Engineering Division, BPH

From: Katheryn Emery, P.E. Engineer Chief
Sewer Technical Review Committee

Date: July 15, 2024

Subject: Crum Public Service District
IJDC Application - 2024W-2562
Water Treatment Plant Construction Project

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1. This committee has reviewed the preliminary application and engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15A. It has been determined that the proposed project is:

   a. ___ Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective, environmentally sound alternative for solving the water needs in this area.

   b. √ Not consistent with the Act and may not be the most cost effective, environmentally sound alternative for solving the water needs in this area.

   c. ___ Same as (a) above except that certain issues need to be addressed prior to design and construction as the attached comments indicate.

2. Our recommendation is that:

   a. ___ The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.

   b. ___ The Funding Committee should recommend that the Council approve the proposed project and its funding plan.

c. ___ The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the engineering report. The proposed project should be tabled for the consultant to address technical comments.

d. √ This project should be referred to the Consolidation Committee.

3. Other remarks:

It is recommended that Crum Public Service District be returned to allow the PSD time to discuss/work with area water providers to determine the best solution for providing the necessary water supply for the area. A more comprehensive study is needed to develop and document the justification for a new centralized WTP in this area. Further, some known or potential operation issues regarding the reliability of the raw water supply should be addressed.

The revised submission should, at a minimum, address the following considerations.

- Assumptions concerning the resale of water to the Town of Ft. Gay must be further developed and documented by an inter-governmental agreement prior to resubmittal.
- The potential adverse financial impact of the loss of sales to the existing resale provider (Kermit Municipal Water) must be quantified and provided in any resubmittal.
- The potential adverse financial impact of the loss of sales to the existing resale provider (Mingo County PSD) must be quantified and provided in any resubmittal.
- The potential to purchase water from other suppliers, including the City of Kenova and others, should be evaluated & documented and a detailed cost-effectiveness analysis should be provided in any resubmittal.
- The potential for raw water contamination must be addressed including alternative sources of raw or finished water for use in emergencies.
- The potential for river intake damage, blockage or other raw-water related operational issues should be considered and discussed in light of the recent intake issues for upstream facilities.