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west virginia department of environmental protection

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Division of Water and Waste Management  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304-926-0495 / Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

**MEMORANDUM**

**To:** Brad Sergent, Chair  
Meredith J. Vance, Director, Environmental Engineering Division, BPH

**From:** Katheryn Emery, P.E., Program Manager  
Sewer Technical Review Committee

**Date:** March 16, 2026

**Subject:** City of Williamstown  
IJDC Application - 2025W-2732  
Water Treatment Plant Improvements

- 
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 wastewater 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.

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- 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:

The project will include installation of new green sand filters and a granular activated carbon (GAC) system sized for 0.40 MGD, well rehabilitation, paving, fencing, a new backwash holding basin, a new treatment building, and select demolition and improvements to the administrative building. This project will remove iron and manganese, as well as perfluoroalkyl and polyfluoroalkyl substances (PFAS).

The total estimated cost of this project is \$6,640,000. The proposed funding scenario includes a \$2,640,000 DWSRF Loan (2.75%, 0.25% Admin., 20 years) a \$2,000,000 DWTRF Principal Forgiveness Loan and a \$2,000,000.00 ECSDC subgrant from the DWSRF.

As the project proceeds through design and cost estimates are updated, the City will need to work with the DWSRF to verify what costs will be eligible for emerging contaminants funding.

Preliminary Project Ratings:

Public Health Benefits: 5  
Compliance with Standards: 10



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### MEMORANDUM

**TO:** Katheryn Emery, P.E., Program Manager, DWWM

**FROM:** Tyler Barrett, E.I., DWWM

**DATE:** March 6, 2026

**SUBJECT:** City of Williamstown  
IJDC Application - 2025W-2732  
Water Treatment Plant Improvements

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### RECOMMENDATION

The IJDC Application and Preliminary Engineering Report (PER) prepared by Burgess & Niple, Inc. for the above referenced project has been reviewed and is technically feasible.

### PROJECT DESCRIPTION

The City of Williamstown (City) treats and distributes potable water to residential and commercial customers in Wood County, West Virginia. The City's system serves approximately 1,580 customers. The City operates a water treatment plant (WTP) pulling water from five wells in Tomlinson Park, supplying an average daily demand of 0.18 million gallons per day (MGD). The existing WTP is designed to treat 0.4 MGD. Approximately 19.3 miles of water distribution mains ranging from 2-inches to 10-inches, three water storage tanks, and one water booster station make up the City's distribution system.

This project will upgrade the existing water treatment plant to remove iron and manganese, as well as perfluoroalkyl and polyfluoroalkyl substances (PFAS) using a granular activated carbon (GAC) system sized for 0.40 MGD. Additionally, improvements are proposed to other areas of the plant. Site improvements include an asphalt drive/parking area, fencing, trench repair, yard piping, and electrical conduit installation. Four existing wellfields and another well located

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inside the administration building are to be rehabilitated as part of this project. A new backwash basin is proposed to store water used in backwashing the GAC filters and release it slowly into the City's wastewater collection system. Improvements to the existing administration building include restroom facilities, offices, and some electrical work. The total estimated cost of this project is \$6,640,000. The proposed funding scenario includes a \$2,640,000 DWTRF Loan (3%, 20 years) , a \$2,000,000 DWTRF Principal Forgiveness Loan and a \$2,000,000.00 Emerging Contaminant Principal Forgiveness Loan from the DWTRF. The proposed monthly rate for 3,400 gallons is \$43.45, or 0.69% of MHI.

## **NEED FOR PROJECT**

For the past several years, there has been a concerted governmental effort to reduce the manufacture and use of perfluoroalkyl and polyfluoroalkyl substances (PFAS). On June 15, 2022, the United States Environmental Protection Agency (USEPA) set the lifetime health advisory levels (HAL) for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) to interim levels of 4 parts per trillion (ppt) and 20 ppt, respectively.

In the latest sampling performed of the City's drinking water in 2023, PFOA concentrations varied from 20.2 to 32.0 ppt. This is approximately five (5) to eight (8) times the level set by the EPA, suggesting that advanced treatment for PFAS removal is required.

Additionally, iron and manganese levels in the City's raw well water are elevated. Iron and manganese are naturally occurring minerals in soils and rocks that can dissolve into groundwater. They are classified by the USEPA as secondary standards which can impact taste, odor and color of the water.

## **DEFICIENCIES/COMMENTS**

- Using the Combined Application, the Design and Total Engineering Fees appear to be within the ASCE Curves.
- The proposed monthly rate is \$43.45, which is 0.69% of MHI.

### **Preliminary Project Ratings:**

Public Health Benefits: 5  
Compliance with Standards: 10

# Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812  
Charleston, West Virginia 25323

Phone: (304) 340-0300  
Fax: (304) 340-0325



March 5, 2026

Meredith J. Vance, Director  
Environmental Engineering Division, WVBPH  
Katheryn Emery, P.E., Program Manager  
CWSRF & DWTRF, Division of Water and Waste Management, WVDEP

Re: Public Service Commission Staff Review Comments  
Application No. 2025W-2732  
Williamstown, City of – Water Treatment & Source Improvements  
Infrastructure Preliminary Application

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of Technical Staff's comments enclosed herewith, we are recommending the application be:

- Forwarded to the Funding Committee  
 Forwarded to the Consolidation Committee  
 Returned to the Applicant

Please advise if you have any questions.

Sincerely,

*Brandon Crace*

Brandon Crace  
Engineering Division

Enclosures

**PUBLIC SERVICE COMMISSION STAFF  
TECHNICAL REVIEW**

**DATE:** March 5, 2026

**PROJECT SPONSOR: CITY OF WILLIAMSTOWN - (WATER)**

**PROJECT SUMMARY:** The City of Williamstown is proposing to make improvements to its water treatment system and water sources.

<b>PROPOSED FUNDING:</b> DWTRF Loan (2.75%, .25% AF, 20 yrs.)	\$2,640,000
DWTRF Emerging Contaminant PFL	<u>\$4,000,000</u>
Total	<u>\$6,640,000</u>

<b>CURRENT RATES:</b>	\$25.47	3,400 gallons
	\$29.96	4,000 gallons

<b>PROPOSED RATES:</b>	\$43.45	3,400 gallons
	\$51.12	4,000 gallons

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Application No. 2025W-2732

**RECOMMENDATION:**  Forward to the Funding Committee  
 Forward to the Consolidation Committee  
 Return to the Applicant

**FINANCIAL:** Stephen Edens

1. Current rates (\$25.47 for 3,400 gallons) are below the rates attributable to 1.25% (\$74.42), 1.5% (\$89.30) and 1.75% (\$104.19) and 2.0% (\$119.07) of the Median Household Income (MHI). Increasing current rates to 1.25%, 1.5%, 1.75% and 2.0% of the MHI would provide additional revenues of \$917,866, \$1,196,959, \$1,476,053 and \$1,755,147 respectively.
2. Using Scenario 1, the preferred funding package consisting of a DWTRF Loan of \$2,640,000 at 2.75%, .25% Admin. Fee for 20 years, and a \$4,000,000 DWTRF Emerging Contaminant PFL, proposed rates (\$43.45 for 3,400 gallons) will provide a cash flow surplus of \$20,344 and debt service coverage of 175.97%.

3. Using the Scenario 2 alternate loan package of \$6,640,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rates (\$64.16 for 3,400 gallons) will provide a cash flow surplus of \$198,154 and debt service coverage of 186.94%.

4. NOTES TO COMMENTS:

A. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package) and Attachment B for Scenario 2 (Loan Package).

B. The Going Level and Proforma adjustments included in the Applicant's Cash Flow Analyses for Scenarios 1 and 2 were used in Staff's Cash Flow Analyses, except as noted on Attachments A and B.

C. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2025, and the applicant's Rule 42 Exhibit submitted with the application.

D. Staff used the MHI for the City of Williamstown of \$71,442 from the 2020 U.S. Census versus the MHI of \$75,577 that was listed in the application.

E. Staff notes the Max Rate Cash Flow Analysis incorrectly reflects the loan amortization for both the preferred and max loan scenarios, thus overstating the debt service associated with the loan scenario. Staff corrected it in its analysis, which resulted in a substantial surplus (based on proposed rates for the loan scenario).

F. Senate Bill 234, effective June 12, 2015, required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11.

G. Senate Bill 234 (2015) required, pursuant to WV Code 24-2-4b (b), that municipally operated utilities shall consider a reasonable plant-in-service depreciation expense for rates and charges. The project sponsor should

take this into consideration when preparing its Rule 42. Municipals that do not provide for a reasonable depreciation expense risk delays in Certificate of Convenience and Necessity filings if rates are determined to not be sufficient.

H. The City of Williamstown should carefully evaluate its revenue requirements before passing a rate ordinance in order to ensure that rates are sufficient to provide a reasonable surplus and meet coverage requirements. Calculations to support the revenue projections should also be provided.

**ENGINEERING:** Brandon Crace

1. Pursuant to House Bill 2742 passed in the 2025 Legislative Session, this project will not require a Certificate of Convenience and Necessity from the PSC.
2. Scope: The City of Williamstown is proposing to make improvements to its water treatment system and water sources. The proposed project scope includes: mobilization, project area videotaping, well cleaning (5 wells), well building rehab (5 wells), instrumentation and controls, electrical improvements, 170 LF of 10-inch finished waterline, 420 LF of 6-inch raw waterline, 130 LF of 4-inch backwash drain line, 90 SY of trench repair, 2 sanitary sewer manholes, 4 bollards, 540 CY of excavation, 180 CY of backfill, 260 CY of concrete, backwash basin piping, backwash basin control valve in vault, 100 CY of compacted backfill, 800 LF of chain-link fence, final grading, 1200 SY of seeding and mulching, site electrical, select demolition, erosion and sediment controls, 870 SY of asphalt paving, 2400 SF building, 4 green sand filters (with installation), 3 chemical feed systems (with installation), Granular Activated Carbon (GAC) units (with installation), piping and valves (GAC system), electrical and controls (GAC system), and necessary appurtenances. The estimated construction cost is \$5,660,000 (includes 22.6% construction contingency), and the estimated total project cost is \$6,640,000 (including 5.16% contingency).

Need: The PER states that elevated levels of Per and Polyfluoroalkyl substances (PFAS), along with Perfluorooctanoic acid (PFOA) concentrations were present in 2023 sampling. The elevated PFOA contaminant levels indicate that Williamstown's water requires advanced treatment for PFAS removal.

Customer Density: This project is an upgrade project; therefore, customer density will remain unchanged.

Cost per Customer: Based upon the estimated total project cost is \$6,640,000, and having approximately 1580 customers, the cost per customer will be approximately \$4,203. The cost per customer in terms of proposed borrowing is \$1,671, as the proposed funding is 60.2% grant.

3. Project Feasibility: The project appears to be technically feasible and poses little technical risk.
4. Project Alternatives: The PER did include an evaluation of 2 alternatives: Alternative 1 – Granular Activated Carbon (GAC), and Alternative 2 – Ion Exchange. The PER indicates Ion Exchange treatment is anticipated to have a higher O&M cost, and the most cost-effective alternative is a GAC system to remove PFAS.
5. Consolidation: There are no consolidation opportunities presented by this project.
6. Operation and Maintenance (O&M) Expenses: The PER indicates that annual O&M expenses are estimated to increase by \$128,100. The PER suggests the increase is due to purchased power, GAC replacement, labor, supplies for routine maintenance, and equipment replacements. However, the IJDC Application indicates an annual O&M increase of \$131,716.
7. Engineering Agreement: The application includes information to determine compliance with West Virginia Code §5G-1-1, *et seq.* Total technical services (engineering) costs for the project are \$761,300, which is equal to 13.45% of the construction cost of \$5,660,000 (includes 22.6% construction contingency).
8. Deficiencies/Comments:
  - Appendix F “Common Detailed Cost Estimates” and Appendix H “GAC Construction Cost Estimate” included 10% contingency prior to including \$630,000 in Contingency as shown on the “Preliminary Construction Cost Estimate – GAC Option”. Calculations indicate a Construction Cost Estimate of \$5,660,000 including \$1,043,000 in Contingency, which equals approximately 22.6%. Contingency amounts should be adjusted prior to requesting a binding commitment.

- The estimated increase of annual O&M expenses is inconsistently reported as: \$128,100 (PER), and \$131,716 (IJDC Application).

CITY OF WILLIAMSTOWN - WATER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2025  
 APPLICATION NO. 2025W-2732  
 March 4, 2026

**PREFERRED FUNDING PACKAGE  
 SCENARIO 1**

	Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b>AVAILABLE CASH</b>				
Operating Revenues	460,463	809,853	-	809,853
Other Operating Revenue	16,305	21,916	-	21,916
SB 234 Annual Working Cash Collections	56,777	73,241	-	73,241
Interest Income & Other Misc.	3,658	3,658	-	3,658
<b>Total Cash Available</b>	<b>537,203</b>	<b>908,668</b>	<b>-</b>	<b>908,668</b>
<b>OPERATING DEDUCTIONS</b>				
Operating Expenses	454,212	585,928	(131) (1)	585,797
Taxes	17,781	17,781	-	17,781
<b>Total Cash Requirements Before Debt Service</b>	<b>471,993</b>	<b>603,709</b>	<b>(131)</b>	<b>603,578</b>
Cash Available for Debt Service (A)	65,210	304,959	131	305,090
<b>DEBT SERVICE REQUIREMENTS</b>				
Principal & Interest (B)		186,444	(13,071) (2)	173,373
Other Debt	49		-	-
Reserve Account @ 10%		18,644	(1,307) (3)	17,337
Renewal & Replacement Fund (2.5%)	16,250	16,250	4,544 (4)	20,794
<b>Total Debt Service Requirement</b>	<b>16,299</b>	<b>221,338</b>	<b>(9,833)</b>	<b>211,505</b>
SB 234 Cash Working Capital	56,777	73,241	-	73,241
<b>Remaining Cash</b>	<b>(7,866)</b>	<b>10,380</b>	<b>9,964</b>	<b>20,344</b>
Percent Coverage (A) / (B)		163.57%		175.97%
Average rate for 3,400 gallons	\$ 25.47	\$ 43.45	\$ -	\$ 43.45
Average rate for 4,000 gallons	\$ 29.96	\$ 51.12	\$ -	\$ 51.12

Staff Adjustments

<u>Adjustment Description</u>			\$	Increase <Decrease>
(1)	<b>Operating Expenses</b>	<b>Per Staff Analysis</b>	<b>585,797</b>	<b>(131)</b>
		<b>Per Application with Project</b>	<b>585,928</b>	
	Staff's calculation included a difference in the Administrative Fee associated with the DWTRF loan.			
(2)	<b>Principal &amp; Interest</b>	<b>Per Staff Analysis</b>	<b>173,373</b>	<b>(13,071)</b>
		<b>Per Application with Project</b>	<b>186,444</b>	
	The difference in P&I is related to Staff's calculation of a loan of \$2,640,000 for 20 years at 2.75%.			
(3)	<b>Reserve Account @ 10%</b>	<b>Per Staff Analysis</b>	<b>17,337</b>	<b>(1,307)</b>
		<b>Per Application with Project</b>	<b>18,644</b>	
	Staff assumed a 10% reserve on the new debt.			
(4)	<b>Renewal &amp; Replacement Fund (2.5%)</b>	<b>Per Staff Analysis</b>	<b>20,794</b>	<b>4,544</b>
		<b>Per Application with Project</b>	<b>16,250</b>	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

CITY OF WILLIAMSTOWN - WATER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2025  
 APPLICATION NO. 2025W-2732  
 March 4, 2026

**LOAN PACKAGE  
 SCENARIO 2**

	Max Rate Going Level Per Application Before Project	Max Rate Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b>AVAILABLE CASH</b>				
Operating Revenues	460,463	1,230,707	-	1,230,707
Other Operating Revenue	16,305	28,371	-	28,371
SB 234 Annual Working Cash Collections	56,777	73,241	-	73,241
Interest Income & Other Misc.	3,658	3,658	-	3,658
<b>Total Cash Available</b>	<b>537,203</b>	<b>1,335,977</b>	<b>-</b>	<b>1,335,977</b>
<b>OPERATING DEDUCTIONS</b>				
Operating Expenses	454,212	585,928	(3,616) (1)	582,312
Taxes	17,781	17,781	-	17,781
<b>Total Cash Requirements Before Debt Service</b>	<b>471,993</b>	<b>603,709</b>	<b>(3,616)</b>	<b>600,093</b>
Cash Available for Debt Service (A)	65,210	732,268	3,616	735,884
<b>DEBT SERVICE REQUIREMENTS</b>				
Principal & Interest (B)		577,106	(183,459) (2)	393,647
Other Debt	49		-	-
Reserve Account @ 10%		57,710	(18,345) (3)	39,365
Renewal & Replacement Fund (2.5%)	16,250	16,250	15,227 (4)	31,477
<b>Total Debt Service Requirement</b>	<b>16,299</b>	<b>651,066</b>	<b>(186,577)</b>	<b>464,489</b>
SB 234 Cash Working Capital	56,777	73,241	-	73,241
<b>Remaining Cash</b>	<b>(7,866)</b>	<b>7,961</b>	<b>190,193</b>	<b>198,154</b>
Percent Coverage (A) / (B)		126.89%		186.94%
Average rate for 3,400 gallons	\$ 25.47	\$ 64.16	\$ -	\$ 64.16
Average rate for 4,000 gallons	\$ 29.96	\$ 75.47	\$ -	\$ 75.47

Staff Adjustments

<u>Adjustment Description</u>			\$	Increase <Decrease>
(1)	<b>Operating Expenses</b>	Per Staff Analysis	582,312	(3,616)
		Per Application with Project	585,928	
	Staff's calculation omits the Administrative Fee associated with a loan.			
(2)	<b>Principal &amp; Interest</b>	Per Staff Analysis	393,647	(183,459)
		Per Application with Project	577,106	
	The difference in P&I is related to Staff's calculation of a loan of \$6,640,000 for 40 years (paid back over 38 years) at 5%.			
(3)	<b>Reserve Account @ 10%</b>	Per Staff Analysis	39,365	(18,345)
		Per Application with Project	57,710	
	Staff assumed a 10% reserve on the new debt.			
(4)	<b>Renewal &amp; Replacement Fund (2.5%)</b>	Per Staff Analysis	31,477	15,227
		Per Application with Project	16,250	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			



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west virginia department of environmental protection

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Charleston, WV 25304-2345  
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Harold D. Ward, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

## MEMORANDUM

MEMO TO: Meredith J. Vance  
Office of Environmental Health Services  
Bureau for Public Health

FROM: Brian D. Bailey  
Technical Analyst  
General Permits & Support Team

DATE: February 27, 2026

SUBJECT: Infrastructure Preliminary Application for the City of Williamstown  
(2025W-2732): Water Treatment Improvements in Wood County, WV.

We have reviewed the above referenced project application information. The City of Williamstown discharges backwash to its site, which is covered under WV/NPDES Permit No. WV0022071, as Industrial User IU01 and expires April 18, 2027.

If the City of Williamstown is considering repairing and painting an existing water treatment plant or storage tanks, then the scope of this project requires precautions to prevent contamination of the waters of the state. Prior to beginning any removal of old paint, the City of Williamstown should contact Mr. Brad Wright or a member of his staff at (304)-926-0499, extension 49746 for guidance in determining whether the paint to be removed is considered a hazardous waste. If so, proper containment and disposal procedures must be followed for the paint and any material associated with the sandblasting. If it is determined that the paint is not hazardous, the City of Williamstown should contact John Lockhart or a member of his staff at (304)-926-0499, extension for proper disposal options.

Construction activities with a disturbed area of one (1) acre or greater are now required to register for the NPDES Storm Water Construction General Permit No. WV0115924 that became

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effective on April 6, 2024. Projects registered under the previous General Permit No. WV0115100 were automatically provided coverage under WV/NPDES General Permit No. WV0115924. For more information, they may contact Larry Board at (304)-926-0499, extension 43883.

In light of the above, we have no objection to this project as long as the appropriate provisions are taken to assure compliance with Chapter 22, Article 11, of the Code of West Virginia and any associated regulations. The responsible party may contact Mylinda Maddox (304) 926-0499 ext. 43825, should additional information be required.

BDB:mam

cc: Katheryn Emery