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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

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

**Date:** May 17, 2026

**Subject:** City of Grafton  
Wastewater System Improvements Project  
IJDC No. 2021S-1934

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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 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.

Promoting a healthy environment.

- 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 scope change will incorporate water line replacement along Main, Latrobe, and St. Johns Streets while removing the previously proposed river crossing and sewer line replacement along Knotts Avenue for a net increase of \$550,000. This project consists of separation work ahead of CSO Outfalls 11, 12, and 28 in accordance with the City's LTCP and Consent Order 6139 to address the removal of CSOs within the collection system.

The proposed cost for this project is \$10,550,000. The City of Grafton will pursue a funding scenario of a \$500,000 IJDC Grant, a \$1,000,000 USDA RD Grant, a \$4,900,000 USDA RD Loan (1.25%, 40 year), a \$3,000,000 CDS Grant, a \$600,000 WV State CDS 20% Match, and a \$550,000 WV WDA EEGF Grant. The proposed month rate for 3,400 gallons is \$32.30 (1.12% MHI).

Preliminary Project Ratings:

Public Health Benefits: 10  
Compliance with Standards: 20



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### MEMORANDUM

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

**FROM:** Spencer Fultineer, DWWM

**DATE:** May 12, 2026

**SUBJECT:** City of Grafton  
Wastewater System Improvements Project  
IJDC No. 2021S-1934

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### RECOMMENDATION

The IJDC application for a Funding and Scope Change prepared by The Thrasher Group for the above referenced project has been reviewed and is technically feasible.

### PROJECT DESCRIPTION

The City of Grafton owns and operates a wastewater collection and treatment system in Taylor County operating under NPDES permit No. WV0021822. This system serves approximately 2,256 customers. The City's waste water treatment plant has a design capacity of 2.3 million gallons per day (MGD) discharged into the Tygart River.

This project will include the separation of existing combined sewer infrastructure affecting CSO-11, CSO-12, and CSO-028. This project will reduce CSO discharges in accordance with the City's Long Term Control Plan (LTCP). The original scope of this project was the replacement of 8" and 12" sanitary sewer lines as well as 12" storm sewer. The first scope change of this project involved additional gravity sewer line and storm sewer line work to continue working on separation affecting CSO-028. This second scope change will incorporate water line replacement along Main St., Latrobe St., and St. John's St. The change will also remove the proposed river crossing and the sewer replacement along Knotts Avenue. The estimated net increase to the total project cost is \$550,000.

The proposed cost for this project is \$10,550,000. The City of Grafton will pursue a funding scenario of a \$500,000 IJDC Grant, a \$1,000,000 USDA RD Grant, a \$4,900,000 USDA RD Loan (1.25%, 40 year), a \$3,000,000 CDS Grant, a \$600,000 WV State CDS 20% Match, and a \$550,000 WV WDA EEGF Grant. The proposed month rate for 3,400 gallons is \$32.30 (1.12% MHI).

### **NEED FOR PROJECT**

This project is necessary to reduce the CSO discharges in the City's system. This project is in accordance with the City's LTCP and in response to Consent Order #6139. This Change in Scope will allow for the project to address weaknesses in the City's water system while maintaining the efficiency of this project. These water lines are aging cast iron and in close proximity to the proposed sewer infrastructure. Replacing these lines along with the sewer separation will reduce potential conflicts during construction. The removal of the river crossing is in response to additional information gathered during the project's design. The crossing in question is not in as bad of a condition as originally anticipated. The removal of the Knotts Avenue sewer replacement will allow for the project to focus project funding in areas that need additional storm sewer improvements.

### **DEFICIENCIES/COMMENTS**

- Using the Combined Application, the Total Engineering Fees appear to be within the ASCE Design Fee Curves.

#### Preliminary Project Ratings:

Public Health Benefits	10
Compliance with Standards	20

# 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



May 14, 2026

Brad Sergent, Chair  
Water Development Authority, Acting Executive Director  
Katheryn Emery, P.E., Program Manager  
CWSRF & DWTRF, Division of Water and Waste Management, WVDEP  
Meredith Vance, Director  
Environmental Engineering Division, WVBPH

Re: Public Service Commission Staff Review Comments  
Application No. 2021S-1934  
Grafton, City of – Sewer System Improvements (Phase I)  
Revised Infrastructure Preliminary Application

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Revised 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:** May 14, 2026

**PROJECT SPONSOR: CITY OF GRAFTON - (SEWER)**

**PROJECT SUMMARY:** The City of Grafton is proposing to revise its previously approved Phase I Wastewater System Improvements project scope by including the replacement of water lines along Main Street, Latrobe Street, and St. Johns Street.

<b>PROPOSED FUNDING:</b> WVIJDC Grant	\$ 500,000
USDA Grant	1,000,000
USDA Loan (1.25%, 40 yrs.)	4,900,000
CDS Grant	3,000,000
WV CDS State Match	600,000
WDA EEG	<u>550,000</u>
Total	\$10,550,000

**CURRENT RATES:** \$32.30 3,400 gallons  
\$38.00 4,000 gallons

**PROPOSED RATES:** \$43.93 3,400 gallons (from 2021 Review)  
\$51.68 4,000 gallons (from 2021 Review)

Application No. 2021S-1934

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

**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 Grafton is proposing to revise its previously approved Phase I Wastewater System Improvements project scope by including the replacement of water lines along Main Street, Latrobe Street, and St. Johns Street. The revised project scope includes: mobilization/demobilization, videotaping project area, erosion and sediment control, construction

stakeout, traffic control, 9250 LF of 6-inch PVC gravity sewer pipe, 250 LF of HDPE gravity sewer pipe, 5575 LF of 8-inch PVC gravity sewer pipe, 450 LF of 8-inch HDPE (horizontal direction drill), 1750 LF of 12-inch PVC gravity sewer pipe, 125 LF of 12-inch HDPE gravity sewer pipe, 100 LF of 24-inch steel casing (bore & jack) with 12-inch PVC gravity sewer pipe, 90 manholes, 1 straddle manhole, 8 internal drop manhole connections, 13 tie-ins to new manholes, 2 tie-ins to new cleanouts, 3 tie-ins to existing manholes, twenty-six (26) 6-inch gravity line cleanouts, 2150 LF of 4-inch sewer lateral pipe, 100 LF of 6-inch sewer lateral pipe, 100 LF of 8-inch sewer lateral pipe, 180 customer reconnections, ninety-five (95) 6-inch wyes, forty (40) 8-inch wyes, 2 cut & plug existing sewer line, 55 concrete anchors, CSO-11 upgrades, 600 LF of gravel trench repair, 8500 LF of asphalt trench repair, 125 LF of concrete trench repair, 60 LF of WVDOH Type "A" trench repair, 2500 LF of WVDOH Type "B" trench repair, 2600 LF of modified WVDOH Type "B" trench repair, 1700 LF of 12-inch HDPE stormwater pipe, 630 LF of 18-inch HDPE stormwater pipe, 1850 LF of 24-inch HDPE stormwater pipe, 2600 LF of 30-inch HDPE stormwater pipe, 100 LF of 36-inch HDPE stormwater pipe, 100 LF of 48-inch steel casing (bore & jack) with 36-inch HDPE stormwater pipe, five (5) 24"x12" tee, four (4) 30"x12" tee, one (1) 12"x12" tee, one (1) 8-inch inserta tee, a 30" concrete wingwall (with rip rap outfall), a 36" concrete wingwall (with rip rap outfall), 63 Type B drop inlets, 5 Type G drop inlets, seven (7) 48-inch storm manholes, twenty (20) 60-inch storm manholes, two (2) 72-inch square manholes, remove existing pipe and cap existing line, 10 tie-ins to existing new inlets, 10 concrete anchors (24-inch), 60 LF of gravel trench repair, 2600 LF of asphalt trench repair, 2500 LF of WVDOH Type "B" trench repair, 1000 LF of modified WVDOH Type "B" trench repair, 180 LF of 2-inch waterline, 250 LF of 4-inch waterline, 1500 LF of 6-inch waterline, 700 LF of 8-inch waterline, 20 LF of 10-inch waterline, 3250 LF of 12-inch waterline, 110 LF of 24-inch steel casing (bore & jack) with 12-inch waterline, 12 fire hydrants, 1 post flushing hydrant, two (2) 2-inch gate valves, one (1) 4-inch gate valve, five (5) 6-inch gate valves, three (3) 8-inch gate valves, seven (7) 12-inch gate valves, 1300 LF of 3/4-inch service line, 20 LF of 1-inch service line, 20 LF of 1-1/2-inch service line), one (1) 2-inch water service, one (1) 1-inch water service, 70 water service reconnections, 5 tie-ins to existing 4-inch waterline, 6 tie-ins to existing 6-inch waterline, 1 tie-in to existing 8-inch waterline, 1 tie-in to existing 10-inch waterline, 5 tie-ins to existing 12-inch waterline, 7 cut & cap existing 4-inch waterline, 9 cut & cap existing 6-inch waterline, 2 cut & cap existing 8-inch waterline, 1 cut & cap existing 10-inch waterline, 5 cut & cap existing 12-inch waterline, 2400 LF of asphalt trench repair, 300 LF of WVDOH Type "B" trench repair, 4150 LF of modified WVDOH Type "B" trench repair, 5400 LF of 2-inch asphalt

overlay (includes roto-milling and pavement markings), 900 LF of full width crusher run overlay, 500 LF of concrete sidewalk repair, 60 LF of brick sidewalk repair, 1350 LF of concrete curb repair, 50 LF of concrete retaining wall repair, 75 LF of rock lined ditch, 120 LF of asphalt gutter repair, and all necessary appurtenances. The estimated construction cost is \$8,261,800 (includes 9.10% construction contingency), and the estimated total project cost is \$10,550,000.

Need: The Request for Change in Scope and Funding indicates that the existing water lines are located in close proximity to sewer infrastructure, which will increase the chances of disturbing the water lines during sewer construction activities. The request suggests that replacing the water lines concurrently with the sewer installation can minimize future disruptions and ensure compliance with utility separation standards. Additionally, the coordinated approach will result in cost savings related to restoration and paving. The Request describes the existing water lines as: composed of cast iron, brittle and prone to cracking, vulnerable to leaks and failures, aged, and in proximity to the proposed sewer improvements.

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 \$10,550,000, and having 2261 sewer customers, the cost per customer will be approximately \$4,667. However, the cost per customer in terms of proposed borrowing is \$2,168, as the proposed funding is approximately 54% grant.

3. Project Alternatives: The Request for Change in Scope and Funding did not include an evaluation of alternatives. The previously submitted PER did include the evaluation of constructing only a new sanitary system, and only a new storm sewer system.
4. Consolidation: There are no consolidation opportunities presented by this project.
5. Operation and Maintenance (O&M) Expenses: The Request for Change in Scope and Funding did not include a discussion or breakdown of changes to O&M. The previously submitted PER (dated January 6, 2024) indicated an anticipated increase of \$6,000 annually as a result of the project.

6. 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 \$1,305,000, which is equal to 15.80 % of the construction cost of \$8,261,800 (includes 9.10% construction contingency).
  
7. Deficiencies/Comments:
  - This request includes \$20,000 for Phase II Project Planning.
  - The budget includes 9.10% construction contingency, which is below the standard 10%, and below the recent years' trend of 15%.