



July 8, 2024

Ms. Aletha Lenahan
IDEM Enforcement Case Manager
Office of Water Quality
Indiana Department of Environmental Management
100 N. Senate Avenue
Indianapolis, IN 46204
alenahan@idem.in.gov

**RE: Town of Claypool Compliance Plan
Q2 2024 Update
NPDES Permit No. IN0039870
Case No. 2021-28427-W**

Dear Ms. Aletha Lenahan:

The Town of Claypool has entered into an Agreed Order (Case No. 2021-28427-W) to address effluent limitation violations, assure proper sludge/solids handling, implement a maintenance program, and locate and eliminate sources of inflow and infiltration (I/I). The Town of Claypool developed a Compliance Plan to conduct Collection System Rehabilitation, Wastewater Treatment Plant (WWTP) and Lift Station Improvements, WWTP Lagoon Cleaning, and Storm Sewer Improvements. The Compliance Plan (CP) was approved by the Indiana Department of Environmental Management (IDEM) on June 20, 2023.

Actions Implemented:

Since the most recent quarterly Compliance Plan update, the Town of Claypool has:

- Continued the design of wastewater utility improvements to approximately 50% completion as described above and included in the attached CP.
- Continued coordination with the Indiana Finance Authority (IFA) State Revolving Loan (SRF) program to obtain an agreeable financing package. The Town's application ranked 33rd out of over 100 applications, which is outside of the fundable range. SRF has urged the Town to evaluate regionalization options to improve the score, improve financial package terms, and potentially minimize rate impacts.

Summary of Planned Actions:

The following activities are scheduled to be completed throughout 2024 or as part of the ongoing Compliance Plan:

- Continue project financing coordination with the IFA SRF.
- Continue to solicit alternative funding options.
- Continue design activities of the proposed project.
- Obtain all required permits by October 31, 2024, which was modified from June 30, 2024. The IDEM OWQ WWTP Construction Permit application will be submitted to Facilities Construction & Engineering Support Section as soon as possible after the Preliminary Effluent Limitations (PELs) are obtained from the Municipal Permits Section.
- Proceed with bidding and construction activities once all permits are obtained and project financing is in place.

Please see the attached revised Compliance Plan reflective of the current wastewater utility improvements implementation schedule. Should you have any additional comments or questions, please feel free to contact Brady Dryer of Commonwealth Engineers, Inc. by email at bdryer@contactcei.com or by phone at (463) 900-1177.

Sincerely,

COMMONWEALTH ENGINEERS, INC.



Brady M. Dryer
Compliance Manager/Partner

BMD/mst

Enclosures

CC: Benny Stage, Jr., Town Council President – Town of Claypool
Ben Adams, P.E., Project Manager – Commonwealth Engineers, Inc.
Chris Harrison, Business Development Manager – Commonwealth Engineers, Inc.

Town of Claypool
NPDES Permit No. IN0039870
Case No. 2021-28427-W
Compliance Plan
Revised March 28, 2024 & July 8, 2024

Project	Milestone	Projected Start Date	Actual Start Date	Projected Completion Date	Actual Completion Date
Wastewater Utility Improvements: <ul style="list-style-type: none"> • Project A – Collection System Rehabilitation • Project B – Continuous Flow SAGR with Miscellaneous WWTP Improvements and Lift Station • Project C – Lagoon Sludge Removal • Project D – Storm Sewer Improvements 	SW/WW Utility Study/PER	June 1, 2022	June 1, 2022	December 31, 2022	December 20, 2022
	Submit SW/WW Utility Study/PER to IFA-SRF for Funding	January 1, 2023	-	April 1, 2023	March 30, 2023
	Design of WW Utility Improvements	August 31, 2023	September 19, 2023	January 31, 2024 May 31, 2024	
	Prepare Preventative Maintenance Plan	July 1, 2023	July 1, 2023	December 31, 2023	December 27, 2023
	Permits (including IDEM Facilities Construction)	February 1, 2024 June 1, 2024 August 1, 2024		April 30, 2024 July 31, 2024 October 31, 2024	
	Bidding	May 1, 2024 August 1, 2024 November 1, 2024		June 30, 2024 September 30, 2024 December 31, 2024	
	Construction	July 1, 2024 October 1, 2024 January 1, 2025		June 30, 2025 September 30, 2025 December 31, 2025	
	Prepare/Submit NPDES Modification Request	January 1, 2025 January 1, 2026		February 28, 2025 December 31, 2026	
	Compliance Demonstration Period	July 1, 2025 October 1, 2025 January 1, 2027		June 30, 2026 September 30, 2026 December 31, 2027	