



January 6, 2025

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
Q4 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 95% completion.
- Continued financial package coordination with the Indiana Finance Authority (IFA) State Revolving Loan (SRF) program, financial advisor, and bond counsel. Consistent with the previous report, loan closing is anticipated by April 30, 2025.
- Submitted Office of Community and Rural Affairs (OCRA) grant application in December 2024.

Summary of Planned Actions:

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

- Submit Facilities Construction Permit Application to IDEM OWQ by the end of January 2025, which is approximately one (1) month delayed from the Q3 2024 CP update; however, bidding, loan closing, and construction commencement dates remain consistent with previous CP report.
- Await OCRA grant award notification, which is anticipated to be in the amount of \$750,000 and expected to occur in February 2025.
- Proceed with bidding, loan closing, and construction activities per the attached revised Compliance Plan.

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: Lynn Stackhouse, Wastewater Inspector – IDEM OWQ
Benny Stage, Jr., Town Council President – Town of Claypool
Danny Warner, Certified Operator of Record – Town of Claypool
Ben Adams, P.E., Senior 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; July 15, 2024; October 4, 2024 and January 6, 2025

Project	Milestone	Projected Start Date	Actual Start Date	Projected 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
	Submit SW/WW Utility Study/PER to IFA-SRF for Funding	January 1, 2023	-	April 1, 2023
	Design of WW Utility Improvements	August 31, 2023	September 19, 2023	January 31, 2024 May 31, 2024 August 31, 2024 November 30, 2023
	Prepare Preventative Maintenance Plan	July 1, 2023	July 1, 2023	December 31, 2023
	Permits (including IDEM Facilities Construction)	February 1, 2024 June 1, 2024 August 31, 2024 December 31, 2024 January 31, 2025		April 30, 2024 July 31, 2024 October 31, 2024 March 31, 2025
	Bidding/Loan Closing	May 1, 2024 August 1, 2024 November 1, 2024 February 1, 2025		June 30, 2024 September 30, 2024 December 31, 2024 April 30, 2025
	Construction	July 1, 2024 October 1, 2024 January 1, 2025 May 1, 2025		June 30, 2024 September 30, 2024 December 31, 2024 April 30, 2025
	Prepare/Submit NPDES Modification Request	January 1, 2025 October 1, 2025		February 28, 2025 October 31, 2025
	Compliance Demonstration Period	July 1, 2025 October 1, 2025 January 1, 2027 May 1, 2026		June 30, 2025 September 30, 2025 December 31, 2025 April 30, 2026

