



January 7, 2026

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 2025 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) Office of Water Quality (OWQ) on June 20, 2023.

Actions Implemented:

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

- Completed and submitted the NPDES Permit renewal application inclusive of facility improvements in November of 2025.
- Completed Construction Progress Meeting No. 1 on December 15, 2025.
- Project A – continued coordination with contractor project schedule for sanitary sewer cleaning/televising.
- Project B - completed rough excavation of both SAGR cells.
- Project D – continued utility locating activities and potholing.

Summary of Planned Actions:

The following activities are scheduled to be completed throughout 2026 and beyond as part of the ongoing Compliance Plan:

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- Project A – initiate cleaning and televising of portions of sanitary sewer collection system.
- Project B - begin construction of the UV structure and 2 x 6 SAGR walls within excavated cells.
- Project D – initiate storm sewer installation activities.

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 Agreed Order Case No. 2021-28427-W Compliance Plan
 Revised March 28, 2024; July 8, 2024; July 15, 2024; October 4, 2024, January 6, 2025, February 12, 2025; April 11, 2025; July 8, 2025 & October 9th & 16th, 2025

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 Removal¹ • Project D – Storm Sewer Improvements 	SW/WW Uty 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	Sept. 19, 2023	January 31, 2024 May 31, 2024 August 31, 2024 November 15, 2024 April 21, 2025	May 19, 2025
	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 31, 2024 December 31, 2024 January 31, 2025	January 30, 2025	April 30, 2024 July 31, 2024 October 31, 2024 March 31, 2025 April 21, 2025	May 19, 2025
	Bidding/Loan Closing	May 1, 2024 August 1, 2024 November 1, 2024 February 1, 2025 April 1, 2025 April 21, 2025	April 25, 2025	June 30, 2024 September 30, 2024 December 31, 2024 April 30, 2025 July 2, 2025 July 31, 2025	July 29, 2025
	Construction	July 1, 2024 October 1, 2024 January 1, 2025 May 1, 2025 July 2, 2025 August 2025	September 15, 2025	June 30, 2025 September 30, 2025 December 31, 2025 April 30, 2026 June 30, 2026 July 2026 October 26, 2026	
	Prepare/Submit NPDES Modification Request	January 1, 2025 October 1, 2025	October 1, 2025	February 28, 2025 October 31, 2025	November 18, 2025
	Compliance Demonstration Period	July 1, 2025 October 1, 2025 January 1, 2027 May 1, 2026 July 1, 2026 August 1, 2026 November 1, 2026		June 30, 2026 September 30, 2026 December 31, 2027 April 30, 2027 June 30, 2027 July 31, 2027 October 31, 2027	

¹The physical dredging and disposal of sludge has been modified to the addition of fine bubble membrane diffusers suspended from an air distribution system comprised of floating laterals that will promote both the internal digestion of sludge while also improving treatment of cBOD₅ and TSS, which was included as part of the IDEM OWQ Facilities Construction Permit application.