



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

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Commissioner

PERMIT FOR PUBLIC WATER SUPPLY CONSTRUCTION

Citizens Water
Sarah Wittig, Plant Purification Engineer
2020 North Meridian Street
Indianapolis, IN 46202

WS-12723

Permit Number

May 30, 2024

Date Issued

Liz Melvin, Section Chief
Drinking Water Permits
Office of Water

You are hereby notified that the Office of Water Quality has approved the general design of plans and specifications of water works improvements to the Citizens Water - Indianapolis public water system (PWSID 5249004). This permit allows for chemical addition construction for the Citizens Water - Indianapolis public water system located in Marion County, Indiana. This Permit is issued under provisions of Indiana Code (IC) 13-15, IC 13-18-16, 327 Indiana Administrative Code (IAC) 8-3, and 327 IAC 8-4-1.

Pursuant to IC 13-15-5-3 and IC 4-21.5-3-4(d), this Permit is effective on the date issued.

The project consists of the installation of a liquid ammonium sulfate chemical addition unit, consisting of storage tanks, day tank, scales, metering pump, and secondary containment, together with all the necessary appurtenances.

This Permit is issued with the following conditions:

1. That the permittee notify, in writing, Liz Melvin, Permits Section Chief, a minimum of ten (10) days, excluding Saturdays, Sundays, and State of Indiana holidays, before exercising a permit issued in accordance with 327 IAC 8-3. The notification may be via email (dwpermits@idem.in.gov) and must include the construction permit number assigned, the location of the construction, a description of the construction, anticipated duration of the construction, and the phone number of the permittee or permittee's representative who will be present during the construction;



2. That after the commissioner has granted a construction permit, no changes in the application, plans, or specifications be made other than changes involving the replacement of equipment of similar design and capacity, none of which will change adversely the plant operation, its hydraulic design or waste products, or the distribution system design, operation, or capacity without first submitting in writing to the commissioner a detailed statement of such proposed changes and receiving an amended construction permit from the commissioner. Construction permits shall become void if the construction is not started within one (1) year from the date of issuance of the permit unless the duration of the permit has been extended by the commissioner after receiving a written request from the permittee, prior to the expiration of the permit, requesting such extension with no other changes to the permit, application, plans, or specifications as approved by the commissioner;
3. That the possession of any permit authorized by 327 IAC 8-3 not be construed to authorize the holder of the permit to violate any law of the State of Indiana or rule;
4. That the facility be designed, constructed, installed, and operated in such a manner that it will not violate any of the sanitary or health regulations or requirements existing at the time of application for the permit;
5. That the facility conform to the design criteria in the 2012 Edition of the "Recommended Standards for Water Works" established by the Great Lakes - Upper Mississippi River Board of State Public Health and Environmental Managers (10 State Standards), the American Water Works Association (AWWA) standards, or is based on such criteria which the applicant shows will produce drinking water of satisfactory quality and normal operating pressure at the peak operating flowrate in accordance with 327 IAC 8-3;
6. That all direct additives to the public water system shall be certified for conformance to ANSI/NSF Standard 60 and all indirect additives, including lubricants, coatings and equipment which conveys potable water, be certified for conformance to ANSI/NSF Standard 61;
7. That any pipe, plumbing fitting or fixture containing more than a weighted average of 0.25% lead, and solders or flux containing more than 0.2% lead are not to be used in the installation or repair of any piping on this project which conveys a potable water supply. Additional information may be obtained at the U.S. Environmental Protection Agency's website at <http://water.epa.gov/drink/info/lead/upload/epa815s13001.pdf>;
8. That SCADA network access and PLC data integrity of water process controls be secured;
9. That automatic controls be designed to allow override by manual controls;

10. That backflow and back siphonage prevention be provided in accordance with 327 IAC 8-10;
11. That if applicable, the Office of Indiana State Chemist's regulations found under 355 IAC 5 must be followed with respect to storage and secondary containment of chemical additives considered pesticides;
12. That the safety, first aid, accidental release, handling, storage, and disposal measures and any other special precautions outlined in the manufacturer's Safety Data Sheets for any chemical addition be followed;
13. That at least one pair of rubber or neoprene gloves, an apron or other protective clothing, and facemask or NIOSH-approved respirator be provided for each operator. A deluge shower and/or eye washing device must be installed where strong acids and alkalis are used or stored;
14. That the ammonium sulfate feed equipment conform to the requirements of Part 5 in the 2012 Edition of the "Recommended Standards for Waterworks" established by the Great Lakes - Upper Mississippi River Board of State Public Health and Environmental Manager;
15. That the physical characteristics, chemical composition, impurity limits, sampling, testing, marking, storage, and application of the liquid ammonium sulfate 40%, $(\text{NH}_4)_2\text{SO}_4$, must comply with American National Standards Institute/NSF standard 60 and/or conform to the AWWA standard B302-16;
16. That the liquid ammonium sulfate be isolated from other chemicals. Compounds must be stored in covered or unopened shipping containers and must be stored inside a clean, dry, well-ventilated area;
17. That no direct connection exist between any sewer or drain and the overflow from the feeder or solution tank;
18. That there be scales, loss-of-weight recorders or liquid level indicators, as appropriate for the ammonium sulfate solution feed, and that they be capable of providing reasonable precision in relation to average daily dose;
19. That as part of the ammonium sulfate chemical addition unit, water monitoring of pH, both the free and total chlorine residual, and both free and total ammonia residual, be conducted in accordance with methods in the 19th edition of "Standard Methods for the Examination of Water and Wastewater" and be measured to the nearest 0.1 milligrams per liter (mg/l);
20. That public water systems which feed ammonium sulfate have test equipment capable of accurately measuring chloramines from 0.1 to 20 mg/l. Testing of the water in the distribution system must be done daily to determine the total chloramine concentration in the water. Total chloramines (measured as chlorine, Cl_2) must not exceed 4 mg/l, the Maximum Residual Disinfectant Level (MRDL).

Testing must be done at points that are representative of the entire system. These results must be reported on the monthly report of operation;

21. That all pipes, tanks, and equipment which can convey or store potable water be disinfected in accordance with procedures outlined by AWW Standard C653-97. The plans and/or specifications must outline the procedure and include the disinfection dosage, contact time, and method of testing the results of the procedure; and
22. That an operation and maintenance manual including a parts list and parts order form, operator training and safety procedures, and an operational troubleshooting section be obtained by the water works as part of any proprietary unit installed.

Plans and specifications entitled Ford Road Water Treatment Plant Ammonia Conversion certified by Sarah E. Prizio, P.E. were submitted by Citizens Energy Group on March 26, 2024.

This Permit shall become void if construction is not started by June 2025. Any fundamental change in plans or specifications which may affect drinking water quality, operations, or public health must be submitted for review and approval by this agency. This Permit may be modified, suspended, or revoked for cause including, but not limited to the following:

1. Violation of any term or condition of this Permit; or,
2. Obtaining this Permit by misrepresentation or failure to fully disclose all relevant facts.

Nothing herein shall be construed as guaranteeing that the proposed public water supply facility shall meet standards, limitations or requirements of this or any other agency of state or federal government, as this agency has no direct control over the actual construction and operation of the proposed project.

If you wish to challenge this permit, you must file a Petition for Administrative Review with the Office of Environmental Adjudication (OEA) and serve a copy of the petition upon IDEM. The requirements for filing a Petition for Administrative Review are found in IC 4-21.5-3-7, IC 13-15-6-1 and 315 IAC 1-3-2. A summary of the requirements of these laws is provided below.

A Petition for Administrative Review must be filed with the Office of Environmental Adjudication (OEA) within fifteen (15) days of the issuance of this notice (eighteen (18) days if you received this notice by U.S. Mail), and a copy must be served upon IDEM.

Addresses are:

Director
Office of Environmental Adjudication
Indiana Government Center North
Room N103
100 North Senate Avenue
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
Room 1301
100 North Senate Avenue
Indianapolis, Indiana 46204

The petition must contain the following information:

1. The name, address, and telephone number of each petitioner.
2. A description of each petitioner's interest in the permit.
3. A statement of facts demonstrating that each petitioner is:
 - a. a person to whom the order is directed;
 - b. aggrieved or adversely affected by the permit; or
 - c. entitled to administrative review under any law.
4. The reasons for the request for administrative review.
5. The particular legal issues proposed for review.
6. The alleged environmental concerns or technical deficiencies of the permit.
7. The permit terms and conditions that the petitioner believes would be appropriate and would comply with the law.
8. The identity of any person(s) represented by the petitioner.
9. The identity of the person against whom administrative review is sought.
10. A copy of the permit that is the basis of the petition.
11. A statement identifying petitioner's attorney or other representative, if any.

Failure to meet the requirements of the law with respect to a Petition for Administrative Review may result in a waiver of your right to seek administrative review of the permit. Examples are:

1. Failure to file a Petition by the applicable deadline;
2. Failure to serve a copy of the Petition upon IDEM when it is filed; or
3. Failure to include the information required by law.

If you seek to have a permit stayed during the administrative review, you may need to file a Petition for a Stay of Effectiveness. The specific requirements for such a Petition can be found in 315 IAC 1-3-2 and 315 IAC 1-3-2.1.

Pursuant to IC 4-21.5-3-17, OEA will provide all parties with notice of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action. If you are entitled to notice under IC 4-21.5-3-5(b) and would like to obtain notices of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action without intervening in the proceeding you must submit a written request to OEA at the address above.

If you have questions regarding your Petition for Administrative Review by the Office of Environmental Adjudication, please refer to the FAQs on OEA's website at <http://www.in.gov/oea>.

In order to assist the permit staff in tracking appeals, we request that you submit a copy of your petition to Liz Melvin, Permits Section Chief, OWQ Drinking Water Branch – Mail Code 66-34, 100 N. Senate Ave, Indianapolis, Indiana 46204-2251.

If you do not object to this Permit, you do not need to take any further action. If you have any questions regarding this matter, please contact Lance Mabry, Permit Review Engineer, Office of Water Quality, at (317) 234-7423.

cc: Marion County Health Department (electronic copy)
Sarah E. Prizio, P.E. (electronic copy)
Lance Mabry, IDEM (electronic copy)
Liz Melvin, IDEM (electronic copy)
Lucio Ternieden, IDEM (electronic copy)
Alan Esko, IDEM (electronic copy)
Karla Goodman, IDEM (electronic copy)
Angie Wickiser, IDEM (electronic copy)
Stacy Jones, IDEM (electronic copy)
Kelly Jones, IDEM (electronic copy)