



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
*Governor*

**Brian C. Rockensuess**  
*Commissioner*

VIA ELECTRONIC MAIL

July 5, 2024

The Honorable Dan Eckstein, Mayor  
City of Hartford City  
700 North Walnut Street  
Hartford City, Indiana 47348

Dear Mayor Eckstein:

Re: Combined Sewer Overflow Program  
LTCP 5-Year Update  
City of Hartford City  
NPDES Permit No. IN0021628  
Agreed Order No. 2008-18088-W  
Blackford County

The Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) has received the City of Hartford City's review of the approved Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) dated March 6, 2024. A periodic review of the CSO LTCP is a requirement of IC 13-18-3-2.4 and is to be conducted no less than every five years after original approval of the LTCP. The original LTCP was approved in a modification of NPDES Permit No. IN0021628, which became effective on May 1, 2012.

The City of Hartford City's submittal included a review of the LTCP and financial indicators that affect a community's Financial Capability Analysis (FCA). The City utilized EPA's 1997 Combined Sewer Overflow Guidance for Financial Capability Assessment and Schedule Development to complete the analysis. Based on this analysis, Hartford City is now in the high burden category. The City states no revisions to the implementation schedule or mitigation measures are being proposed.

IDEM has expressed concerns with Hartford City's current CSO LTCP level of control during previous 5-year reviews, specifically related to development of rulemaking associated with a CSO Use Attainability Analysis (UAA). Given that full implementation of the LTCP will not result in compliance with Water Quality Standards (WQS), Hartford City plans to submit a UAA to support revising WQS to the Wet Weather Limited Use Subcategory. The City's current CSO level of control is to capture and fully treat flows resulting from the 1-year, 1-hour storm. Representatives from IDEM and the City of Hartford City met on May 15, 2024, where IDEM reiterated concerns with the current CSO level of control and potential issues with future UAA rulemaking

approval by U.S. EPA. The City provided a follow up letter on June 20, 2024 stating that they plan to continue implementing the current LTCP. As a part of the UAA process, IDEM must develop rulemaking which, among other items, must include appropriate restrictions on CSOs, including some type of limit on remaining overflow events that reflects the level of control approved in the LTCP. Such restrictions are necessary to ensure that the revised standards associated with the Wet Weather Limited Use Subcategory reflect the highest attainable recreational use. Such rulemaking must be submitted to EPA for their approval under section 303(C) of the Clean Water Act (CWA). If IDEM and/or EPA are unable to correlate Hartford City's first flush level of control as an acceptable highest attainable use, then the UAA rulemaking will not be approved. Without UAA approval, Hartford City is subject to Agency and/or third-party action for not achieving compliance with WQS.

In addition, although the 5-year Update states that there are no revisions to the implementation schedule, the implementation schedule does include revised dates compared to the implementation schedule included in the revised 5-year Update received on April 22, 2019. Specifically, Item 6 (Mitigation Option No. 30 – Phase 3 Construction Completion) and Item 7 (Mitigation Option No. 30 – Phase 3 Post Construction Monitoring) have been changed. The updated date for Item 6 has been verified via a letter provided by the City on November 29, 2023 to confirm completion of Phase 3 construction. Although Item 7 (Mitigation Option No. 30 Phase 3 Post Construction Monitoring) may not be officially extended via this letter, IDEM will exercise enforcement discretion to effectuate the City's request. Item 7 must be completed, and documentation submitted, to IDEM by November 28, 2025. All subsequent projects outlined in the LTCP Implementation Schedule remain unchanged. Please ensure any future schedule changes are requested via submittal of a LTCP Schedule Amendment. Hartford City's June 20, 2024, letter states they plan to install additional flow meters that will be used to update their model for reevaluation of remaining CSO events after the recently completed Phase 3 projects and after future completion of Phase 4 projects.

Upon full implementation of the LTCP, if the City of Hartford City is found to not be meeting their CSO level of control, the City will have to perform additional work in a CSO Compliance Plan.

Please contact Allie Gates at 317/232-5114 or by email at [agates1@idem.in.gov](mailto:agates1@idem.in.gov) if you have questions regarding this letter.

Sincerely,



Leigh Voss, Chief  
Municipal NPDES Permits Section  
Office of Water Quality

cc: Travis Williamson, Wastewater Superintendent  
Keith Bryant, United Consulting  
Aletha Lenahan, IDEM Enforcement Case Manager



**MAYOR  
DAN ECKSTEIN**

**OFFICE OF THE MAYOR**  
**CITY OF HARTFORD CITY**  
*Together We're Better*

700 North Walnut Street  
Hartford City, IN 47348  
Office: 765-348-0412  
Fax: 765-348-7244

June 10, 2024

**Indiana Department of Environmental Management**  
**Office of Water Quality – Wet Weather Section**  
100 N. Senate Avenue, Room IGCN 1255  
Indianapolis, Indiana 46204  
**Attn.: Ms. Alexandra Gates, Municipal Permit Manager**

Re: *NPDES Permit No. IN0021628*  
*Long-Term Control Plan – Addendum No. 5*  
*Hartford City, Indiana*

Dear Ms. Gates:

We appreciate your office meeting with our staff and engineer on May 15, 2024, to discuss the evolution of the CSO program and IDEM / EPA current requirements. We understand that things have changed over the last twenty years and anticipate additional changes as we proceed with the implementation of our approved Plan.

We are confident that our final Phase 4 Project is an important step towards our compliance and will be desired in any final mitigation scope. As such, at this time we plan to continue with our approved LTCP Plan and install additional flow meters. With this information and data from the current meters installed in the last several years, we plan to update our model and evaluate remaining CSO events after our recently completed Phase 3 Project as well as future Phase 4 Project.

Based upon the results of this evaluation and potential clarity and further evolution of the State and Federal requirements in the future, we will consider any needed steps or additions to our Plan moving forward.

If you have any questions or comments, please contact our office at your convenience.

Sincerely,

City of Hartford City

Dan Eckstein  
Mayor

cc: Mr. Travis Williamson, Wastewater Superintendent  
Mr. Keith Bryant, P.E., United Consulting



**MAYOR  
DAN ECKSTEIN**

**OFFICE OF THE MAYOR**  
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March 11, 2024

**Indiana Department of Environmental Management**  
**Office of Water Quality – Wet Weather Section**  
100 N. Senate Avenue, Room IGCN 1255  
Indianapolis, Indiana 46204  
**Attn.: Ms. Allie Gates, Municipal Permit Manager**

Re: *NPDES Permit No. IN0021628*  
*Long-Term Control Plan – Addendum No. 5*  
*Hartford City, Indiana*

Dear Ms. Gates:

Please consider this letter as the transmittal letter for the Addendum No.5 submitted to your office via email on March 7, 2024, by United Consulting.

If you have any questions or comments, please contact our office at your convenience.

Sincerely,

**City of Hartford City**

Dan Eckstein  
Mayor

cc: Mr. Travis Williamson, Wastewater Superintendent  
Mr. Keith Bryant, P.E., United Consulting

**COMBINED SEWER OVERFLOW (CSO) LONG-TERM CONTROL PLAN  
ADDENDUM No. 5  
MARCH, 2024**

For the

**CITY OF HARTFORD CITY  
BLACKFORD COUNTY, INDIANA**

Project No. 23-903-04

**BOARD OF PUBLIC WORKS & SAFETY  
IDEM SUBMITTAL DOCUMENT**

CONSULTING ENGINEER:



8440 Allison Pointe Boulevard, Suite 200  
Indianapolis, Indiana 46250  
Telephone: (317) 895-2585  
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03/06/2024



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**Brian Keith Bryant, P.E.**

Reg. Engineer No. 19800081

State of Indiana

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## I. INTRODUCTION

This document has been prepared to serve as the five year update of Hartford City's Combined Sewer Overflow (CSO) Long-Term Control Plan in accordance with the wastewater facility's NPDES Permit No. IN0021628. This update focuses on three key components associated with the CSO Long-Term Control Plan; the first component being the project revisions, the second component being the updated financial capability assessment, and the third component being the implementation schedule. A brief description of each component is as follows and will be discussed in greater detail in the subsequent sections:

Project Revisions: Project revisions are common when a project transitions from the preliminary stage to the design stage. This is due to the additional information that is acquired for the design phase as well as the in-depth attention to detail given by the engineer(s). Finally, as technology or other potential alternatives become available, they are evaluated for potential application.

Financial Capability Assessment: It is crucial to reevaluate the financial capability assessment in order to determine if the selected plan will have a detrimental economic impact which have been changed since previous evaluations. The financial capability assessment has been updated to include the most current values that are available to date and follow the EPA 2021 Financial Capability Assessment Guidance document.

Implementation Schedule: The evaluation of the implementation schedule is vital in order to track the City's progress and to identify any issues that may exist and/or be forthcoming. Completed projects as well as current projects in design have been taken into account for this evaluation.

The following sections will discuss each component in detail as well as any deviation(s) and/or modifications made.

## II. PROJECT REVISIONS

As previously discussed, project revisions are common when a project transitions from the preliminary stage through the design stage. During the design of Phase 2, there were several revisions made to Sub-Project No. 10 which were addressed in Hartford City's CSO LTCP Addendum No. 3. Addendum No. 3 was submitted to the Indiana Department of Environmental Management (IDEM) on May 10, 2016 and ultimately approved on June 30, 2016. Additionally, the City consolidated CSO 003 "B" and CSO 004 "C" which was addressed in Addendum No. 4 submitted to IDEM on April 17, 2019. Revisions were made to Sub-Projects No. 3, No. 5, and No. 16, and order of completion for Sub-Project No. 7 during Phase 3 that are addressed in this addendum. Additional sewer separation work was completed as a result of the S SR 3 Sewer project while the Miscellaneous WWTP Improvements project in progress will improve the treatment capabilities of Hartford City. The following sections provide a brief overview of the project revisions and additional work.

**A. Phase 2 – Sub-Project No. 10**

The proposed outfall location was revised for Sub-Project No. 10. The revision was made due to the Wabash Avenue Extension Project, which provided a more cost-effective stormwater outfall route. The revision had a cost savings due to the reduction in pipe quantities. Also, there is a railroad spur that the prior alignment would have been required to cross and was avoided with the new route. As part of the Wabash Avenue Extension Project, the road was extended northbound to join North Wabash Avenue. Sub-Project No. 10 was connected to Sub-Project No. 14 and discharges to the previously constructed outfall which was part of the Phase 1 Project. The outfall is located near the southeast corner of the intersection of Water Street (State Road 26) and County Road South 100 West.

**B. Consolidation of CSO 003 “B” and CSO 004 “C”**

In addition to the revisions made to Sub-Project No. 10, The City consolidated CSO 003 “B” and CSO 004 “C” which was approved by the IDEM Facility Construction and Engineering Support Section on December 19, 2017. In accordance with the Combined Sewer Overflow (CSO) Monitoring Plan, the City was to install a flow monitor at CSO 004 “C” which shared an existing diversion structure with CSO 003 “B”. The original intent as identified in the monitoring plan was to install the flow monitor at CSO 004 “C” and estimate the discharges for CSO 003 “B” due to its close proximity. In order to more accurately monitor flows, the City removed and abandoned CSO 004 “C” and increased the overflow pipe size for CSO 003 “B” from 10-inches to 18-inches. As part of the improvements, a proposed flow meter structure was installed in-line with the new 18-inch overflow pipe from CSO 003 “B” at a higher elevation. The IDEM construction permit number for the project was 22483 and it was issued on December 19, 2017.

**C. Phase 3 – Sub-Project No. 3**

It was decided to remove Sub-Project No. 3 from the Mitigation Option No. 30 scope. Sub-Project No. 3 was located at Hickory Grove Road and Midway Drive originally continuing east to Little Lick Creek. The first revision changed the flow direction to the west and eliminated the outfall at Little Lick Creek. Ultimately, it was determined that the mitigation area of Sub-Project No. 3 was small with a limited benefit and was deemed to have negligible benefits compared to the additional separation gained from the S SR 3 Sewer Project (Sub-Section F) and other project additions and changes. Sub-Project No. 3 was eliminated.

**D. Phase 3 – Sub-Project No. 5**

The storm sewer system and separation for Sub-Project No. 5 was extended. The original alignment extended 129’ west on Ohio Street from the Ohio Street and High Street intersection. This revision was made when poor drainage was observed south and west of the proposed storm sewer during construction. Since construction was in progress in the area, it was agreed to extend the storm sewer to mitigate the drainage issues. The



revised alignment added 156' of storm sewer on Ohio Street. The City also extended the storm sewer and separation on High Street south to Perkins Street.

**E. Phase 3 – Sub-Project No. 16**

Sub-Project No. 16 was originally planned to direct flow from the combined sewer on S Wilman Pike to CSO #18. However, during survey for Phase 3 no storm sewer connections to the sanitary sewer were found. Further investigation revealed prior sewer separation in the area, eliminating the need for Sub-Project No. 16. The sub-project was removed accordingly.

**F. Phase 4 – Sub-Project No. 7**

The replacement of the sanitary sewer along Wabash Avenue from Conger Street to Perry Avenue was completed during Phase 3 as investigation of the sewer revealed extreme deterioration. This area overlaps with planned storm sewer work in Sub-Project No. 7 in Phase 4. The storm outfall from Sub-Project No. 7 was completed in Phase 3 instead of Phase 4 to avoid redundant roadway restoration. The storm outfall planned for Sub-Project No. 8 was combined with the outfall completed in Phase 3.

**G. S SR 3 Sewer Project**

The S SR 3 Sewer project separated the storm and sanitary sewers on S SR 3 from Franklin Street to Little Lick Creek. Mitigation Option No. 30 did not originally include this separation. The sanitary and storm sewers were separated as part of this project for the amount of \$2,105,549.50 with 5,945' of storm sewer installed. The separation achieved through this project is additional to the improvements included in Mitigation Option No. 30.

**H. Miscellaneous WWTP Improvements Project**

The Miscellaneous WWTP Improvements Project is beginning construction. The goal of this project is to improve the peak flow capacity and dependability of treatment at the Hartford City Wastewater Treatment Plant. The improvements include the replacement of the weirs, troughs and scum collectors at the primary clarifiers and replacement of the weirs, troughs, scum collectors and RAS telescoping valves at the secondary clarifiers, the manual screen bar, the sludge flow splitter, and others to the amount of \$808,500.

Updated and proven technologies were reviewed and found not to be desirable at this time from a cost/mitigation level perspective. Technologies have not progressed appreciably since the last LTCP review.

### **III. UPDATED FINANCIAL CAPABILITY ASSESSMENT (FCA)**

The following sections explain the standardized rational methodologies to evaluate socio-economic conditions for a community, based upon the Environmental Protection Agency's (EPA) 1997 Combined Sewer Overflows – Guidance for Financial Capability Assessment and Schedule Development – 2021 Revision. The guidance presents a two-phase approach to assessing Hartford

City’s financial capability. The first phase identifies the combined impact of wastewater and CSO control costs on individual households. The second phase examines the debt, socioeconomic, and financial conditions of the City. The results of the two-phase analysis are combined in a Financial Capability Matrix. Please note that the line numbers as identified in the tables within this section corresponds with the worksheets as included in the EPA’s 1997 Guidance Document – 2021 Revision.

**A. Phase 1: The Residential Indicator**

The Residential Indicator measures the financial impact of the current and proposed wastewater treatment and CSO controls on residential users. Development of this indicator begins with the determination of the current and proposed wastewater treatment (WWT) and CSO control costs per household (CPH). Second, the service area’s CPH estimate and the median household income (MHI) are used to calculate the Residential Indicator (RI). Finally, the Residential Indicator is compared to established financial impact ranges to determine whether CSO controls will produce a possible high, mid-range, or low financial impact on the City’s residential users.

**1. Cost Per Household (CPH)**

The following table provides that values used to determine the CPH:

**TABLE 1  
COST PER HOUSEHOLD**

Current WWT Costs		Line Number
Annual Operations and Maintenance Expenses (Excluding Depreciation):	\$1,735,345	100
Annual Debt Service (Principal and Interest):	\$1,235,729	101
Subtotal (Line 100 + 101):	\$2,971,073	102
Projected WWT and CSO Costs (Current Dollars)		
Estimated Annual Operations and Maintenance Expenses (Excluding Depreciation):		103
Annual Debt Service (Principal and Interest):	\$614,066	104
Subtotal (Line 103 + 104):	\$614,066	105

Combined Sewer Overflow (CSO) Long-Term Control Plan  
Addendum No. 5  
Hartford City, Indiana

Total Current and Projected WWT and CSO Costs (Line 102 + Line 105):	<u>\$3,585,139</u>	106
Residential Share of Total WWT and CSO Costs:	<u>\$2,054,285</u>	107
Total number of Households in Service Area:	<u>2,422</u>	108
Cost Per Household (Line 107 / Line 108):	<u>\$848</u>	109

**2. Residential Indicator (RI)**

The following table provides that values used to determine the Residential Indicator and the overall score:

**TABLE 2  
RESIDENTIAL INDICATOR**

Median Household Income (MHI)		<u>Line Number</u>
Census Year MHI:	<u>\$34,748</u>	201
MHI Adjustment Factor:	<u>1.13</u>	202
Adjusted MHI (Line 201 x Line 202):	<u>\$39,109</u>	203
Annual WWT and CSO Control Cost Per CPH (Line 109):	<u>\$848</u>	204
Residential Indicator:		
Annual Wastewater and CSO Control Costs per Household as a percent of Adjusted Median Household Income (CPH as % MHI) (Line 204 / Line 203 x 100):	<u>2.17</u>	205
Score:	<u>High</u>	

In accordance with the EPA’s Guidance Document, if the annual wastewater and CSO control costs per household as a percent of adjusted median household income is less than 1%, the overall impact is considered to be “Low”. If the percentage is between 1% and 2%, the impact is considered to be “Mid-Range”. If the percentage is greater than 2%, the impact is considered to be “High”.

Based upon the definition in the Guidance Document, the impact level is considered to be “High”.

**B. Phase 2: Hartford City’s Financial Capability Indicators**

In the second phase, selected indicators are assessed to evaluate the financial capability of Hartford City. These indicators will examine the City’s debt burden, socioeconomic conditions, and financial operations. The second-phase examines three general categories of financial capability indicators for the City which are as follows:

- Debt Indicators – Assess current debt burden within the City’s service area and their ability to issue additional debt to finance the CSO controls. The indicators used for this purpose are:
  - Bond Ratings
  - Overall Net Debt as a Percent of Full Market Property Value
  
- Socioeconomic Indicators – Assess the general economic well-being of residential users in the City’s service area. The indicators used for this purpose are as follows:
  - Unemployment Rate
  - Median Household Income
  
- Financial Management Indicators – Evaluate the City’s overall ability to manage financial operations. The indicators for this purpose are as follows:
  - Property Tax Revenue Collection Rate
  - Property Tax Revenues as a Percent of Full Market Property Value

**1. Bond Rating**

The following table provides that values used to determine the bond rating and the overall score:

**TABLE 3  
 BOND RATING**

Most Recent General Obligation Bond Rating	Line Number
Date:	_____
Rating Agency:	_____
Rating:	_____ 301
Most Recent Revenue (Water/Sewer or Sewer) Bond	
Date:	_____
Rating Agency:	_____

Bond Insurance (Yes/No):		
Rating:		302
Summary of Bond Rating:		303
Score:		

In accordance with the EPA’s Guidance Document, if the City has a bond rating of Ba, B, Caa, or C, the score is considered to be “Weak”. If the bond rating is Baa, the score is considered to be “Mid-Range”. If the bond rating is Aaa, AA, or A, the score is considered to be “Strong”.

Hartford City has not gotten a bond rating for their three most recent bonds. The last bond rating is from 7 years ago (2017) and is no longer indicative of the debt burden. No bond rating indicative of the current debt burden is available for use in this analysis.

**2. Overall Net Debt as a Percent of Full Market Property Value**

The following table provides that values used to determine the overall net debt as a percent of full market property value and the overall score:

**TABLE 4  
OVERALL NET DEBT AS A PERCENT OF FULL MARKET PROPERTY VALUE**

		<u>Line Number</u>
Direct Net Debt (G.O. Bonds Excluding Double-Barreled Bonds):	<u>\$3,179,103</u>	401
Debt of Overlapping Entities (Proportionate Share of Multijurisdictional Debt):	<u>\$4,218,030</u>	402
Overall Net Debt (Lines 401 + 402):	<u>\$7,397,133</u>	403
Full Market Value of Property:	<u>\$321,652,060</u>	404
Overall Net Debt as a Percent of Full Market Property Value (Line 403 divided by Line 404 x 100):	<u>2.3</u>	405
Score:	<u>Mid-Range</u>	

In accordance with the EPA’s Guidance Document, if the overall net debt as a percent of full market property value is above 5%, the score is considered to be “Weak”. If the percentage is between 2% and 5%, the score is considered to be

“Mid-Range”. If the percentage is below 2%, the score is considered to be “Strong”.

Based upon the definition in the Guidance Document, Hartford City’s score is considered to be “Mid-Range”.

### 3. Unemployment Rate

The following table provides the local and average national unemployment rates and the overall score:

**TABLE 5  
 UNEMPLOYMENT RATE**

		Line Number
Unemployment Rate – Permittee:		501
Source:		
Unemployment Rate – County (use if permittee’s rate is unavailable):	3.3%	502
Source:	STATS Indiana	
Benchmark		
Average National Unemployment Rate:	3.7%	503
Source:	B.L.S.	
Difference:	-0.4%	
Score:	Mid-Range	

In accordance with the EPA’s Guidance Document, if the local unemployment rate is more than 1% above the national average, the score is considered to be “Weak”. If the local unemployment rate is plus or minus 1% of the national average, the score is considered to be “Mid-Range”. If the local unemployment rate is more than 1% below the national average, the score is considered to be “Strong”.

Based upon the definition in the Guidance Document, Hartford City’s score is considered to be “Mid-Range”.

**4. Median Household Income**

The following table provides the local and average median household income and the overall score:

**TABLE 6  
 MEDIAN HOUSEHOLD INCOME**

		<u>Line Number</u>
Median Household Income – Permittee (Line 203):	<u>\$39,109</u>	601
Source:	<u>U.S. Census</u>	
Benchmark		
National MHI:	<u>\$74,755</u>	602
Source:	<u>U.S. Census</u>	
Permittee MHI to National MHI: (Line 601/602)	<u>-47.68%</u>	603
Score:	<u>Weak</u>	

In accordance with the EPA’s Guidance Document, if the local median household income is more than 25% below the national average, the score is considered to be “Weak”. If the local median household income is plus or minus 25% of the national average, the score is considered to be “Mid-Range”. If the local median household income is more than 25% above the national average, the score is considered to be “Strong”.

Based upon the definition in the Guidance Document, Hartford City’s score is considered to be “Weak”.

**5. Property Tax Revenues as a Percent of Full Market Property Value**

The following table provides that values used to determine the percent of full market property value and the overall score:

**TABLE 7  
 PROPERTY TAX REVENUES AS A PERCENT OF FULL MARKET PROPERTY VALUE**

		<u>Line Number</u>
Full Market Value of Real Property (Line 404):	<u>\$321,652,060</u>	701
Total Property Tax Revenues:	<u>\$13,976,242</u>	702
Property Tax Revenue as a Percent of Full Market Property Value (702 / 701 x 100):	<u>4.35</u>	703
Score:	<u>Weak</u>	

In accordance with the EPA’s Guidance Document, if the property tax revenue as a percent of full market property value is above 4%, the score is considered to be “Weak”. If the property tax revenue as a percent of full market property value is between 2% and 4%, the score is considered to be “Mid-Range”. If the property tax revenue as a percent of full market property value is below 2%, the score is considered to be “Strong”.

Based upon the definition in the Guidance Document, Hartford City’s score is considered to be “Weak”.

**6. Property Tax Revenue Collection Rate**

The following table provides that values used to determine the property tax revenue collection rate and the overall score:

**TABLE 8  
 PROPERTY TAX REVENUE COLLECTION RATE**

		<u>Line Number</u>
Property Tax Revenue Collected (Line 702):	<u>\$13,976,242</u>	801
Property Taxes Levied:	<u>\$15,090,884</u>	802
Property Tax Revenue Collection Rate (801 / 802 x 100)	<u>92.61</u>	803
Score:	<u>Weak</u>	



In accordance with the EPA’s Guidance Document, if the property tax revenue collection rate is below 94%, the score is considered to be “Weak”. If the property tax revenue collection rate is between 94% and 98%, the score is considered to be “Mid-Range”. If the property tax revenue collection rate is above 98%, the score is considered to be “Strong”.

Based upon the definition in the Guidance Document, Hartford City’s score is considered to be “Weak”.

**7. Summary of Permittee Financial Capability Indicators**

The following table provides a summary of Hartford City’s financial capability indicators:

**TABLE 9  
 SUMMARY OF PERMITTEE FINANCIAL CAPABILITY INDICATORS**

Indicator	Actual Value	Score	Score	Line Number
Bond Rating (Line 303):				901
Overall Net Debt as a Percent of Full Market Property Value (Line 405):	2.3	Mid-Range	2	902
Unemployment Rate (Line 502):	3.3	Mid-Range	2	903
Median Household Income (Line 601):	\$39,109	Weak	1	904
Property Tax Revenues as a Percent of Full Market Property Value (Line 703):	4.35	Weak	1	905
Property Tax Revenue Collection Rate (Line 803):	92.61	Weak	1	906
Permittee Indicators Score (Sum of Column B / Number of Entries):	1.2			907

In accordance with the EPA’s Guidance Document, Hartford City’s indicators score is 1.2. Since a Bond Rating is not available, no score could be assigned to this debt indicator. In accordance with the EPA’s Guidance Document, the scores for the Property Tax Revenues as a Percent of Full Market Property Value and Property Tax Revenue Collection Rate were averaged and used as one indicator to not give undue weight to the financial management indicators.

**8. Financial Capability Matrix Score**

The following table provides Hartford City’s financial capability matrix score:

**TABLE 10  
FINANCIAL CAPABILITY MATRIX SCORE**

		<u>Line Number</u>
Residential Indicator Score (Line 205):	<u>2.17</u>	1001
Permittee Financial Capability Indicators Score (Line 907):	<u>1.2</u>	1002
Financial Capability Matrix Category:	<u>High Burden</u>	1003

In accordance with the EPA’s Guidance Document, Hartford City’s financial capability matrix category is considered to be “High Burden”.

**9. Financial Capability Matrix**

The following is the Financial Capability Matrix for Hartford City:

<b>Permittee Financial Capability Indicators Score</b> (Socioeconomic, Debt and Financial Indicators)	<b>Residential Indicator</b> (Cost Per Household as a % of MHI)		
	Low (Below 1.0%)	Mid-Range (Between 1.0 and 2.0%)	High (Above 2.0%)
Weak (Below 1.5)	Medium Burden	High Burden	<b>High Burden</b>
Mid-Range (Between 1.5 and 2.5)	Low Burden	Medium Burden	High Burden
Strong (Above 2.5)	Low Burden	Low Burden	Medium Burden

*Hartford City’s Residential Indicator: 2.17*  
*Hartford City’s Financial Capability Indictors Score: 1.2*

In accordance with the EPA’s Guidance Document, the implementation of the selected and previously approved CSO mitigation project is considered to be “High Burden”.

#### IV. IMPLEMENTATION SCHEDULE

In accordance with the EPA’s Guidance Document, the financial capability general scheduling boundaries are as follows:

Financial Capability Matrix Category	Implementation Period
Low Burden	Normal Engineering / Construction
Medium Burden	Up to 10 years
High Burden	Up to 15 years*
	*Schedule up to 20 years based on negotiation with EPA and state NPDES authorities.

Due to the City being in the “High Burden” category, no revisions to the implementation schedule or mitigation measures are being proposed to the previously approved CSO mitigation project and the 20-year implementation schedule. The City has planned implementation to meet the previously approved 20-year implementation schedule.

Hartford City is successfully making progress with the design and construction of Mitigation Option No. 30 as outlined in the approved CSO Long-Term Control Plan – Addendums No. 1, 2, 3, and 4. The City has completed Phases 1, 2, and 3 the current schedule is as follows:

Revised Implementation Schedule		
Item No.	Task Description	Completion Date
1	UAA Process	November 1, 2010
2	Mitigation Option No. 30 – Phase 1 Construction Completion	* May 30, 2015 (Originally June 15, 2014)
3	Mitigation Option No. 30 – Phase 1 Post Construction Monitoring	* May 30, 2017 (Originally June 15, 2016)
4	Mitigation Option No. 30 – Phase 2 Construction Completion	September 23, 2018 (Originally February 1, 2019)
5	Mitigation Option No. 30 – Phase 2 Post Construction Monitoring	February 1, 2021
6	Mitigation Option No. 30 – Phase 3 Construction Completion	November 28, 2023 (Originally September 15, 2023)
7	Mitigation Option No. 30 – Phase 3 Post Construction Monitoring	November 28, 2025 (Originally September 15, 2025)

8	Mitigation Option No. 30 – Phase 4 Construction Completion	May 1, 2028
9	Mitigation Option No. 30 – Phase 4 Post Construction Monitoring	November 1, 2028

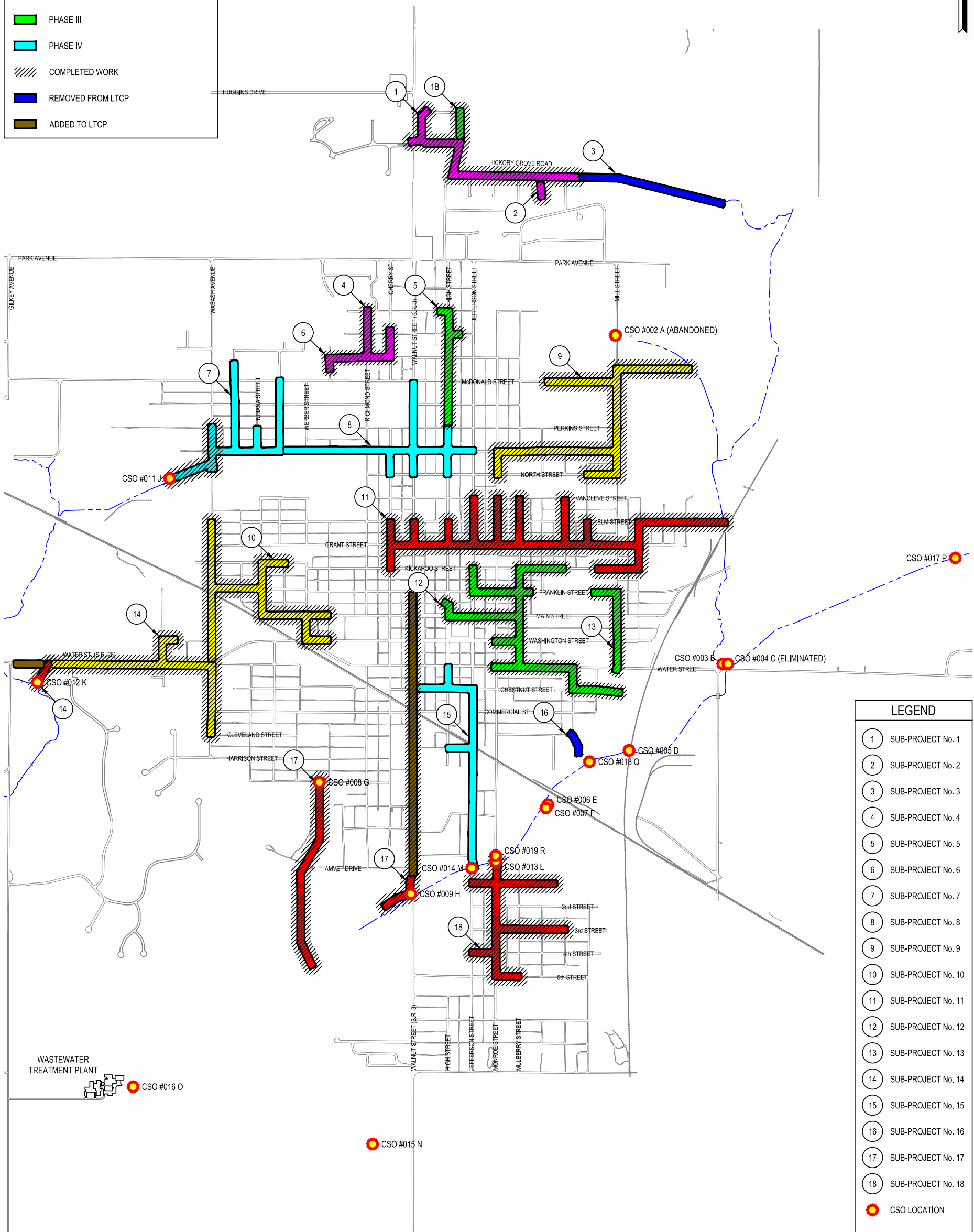
*\* On September 11, 2013, the City formally requested from IDEM a time extension for Phase 1 in order to avoid the issues that are commonly associated with winter construction i.e. water system freezing, erosion and debris upon the roadways, cold-weather shutdowns, snow plow interference, public safety, winter construction expenses, etc. This request was formally approved by IDEM on September 23, 2013.*

## **V. CONCLUSION**

Based upon the findings as identified within this update, no revisions to the implementation schedule or mitigation measures are being proposed to the previously approved CSO mitigation project and the 20-year implementation schedule.

PROJECT PHASING LEGEND

- PHASE IA
- PHASE I
- PHASE II
- PHASE III
- PHASE IV
- COMPLETED WORK
- REMOVED FROM LTCP
- ADDED TO LTCP



LEGEND	
1	SUB-PROJECT No. 1
2	SUB-PROJECT No. 2
3	SUB-PROJECT No. 3
4	SUB-PROJECT No. 4
5	SUB-PROJECT No. 5
6	SUB-PROJECT No. 6
7	SUB-PROJECT No. 7
8	SUB-PROJECT No. 8
9	SUB-PROJECT No. 9
10	SUB-PROJECT No. 10
11	SUB-PROJECT No. 11
12	SUB-PROJECT No. 12
13	SUB-PROJECT No. 13
14	SUB-PROJECT No. 14
15	SUB-PROJECT No. 15
16	SUB-PROJECT No. 16
17	SUB-PROJECT No. 17
18	SUB-PROJECT No. 18
	CSO LOCATION

File Name: P:\W\1\23-903-04\_Hartford City - LTCP Addendum 5\Exhibit\2015-11-04\_Revise Phasing Exhibit.dwg Plot Date: 3/6/2024 3:32:27 PM Plotted By: alan robinette

WASTEWATER TREATMENT PLANT  
 CSO #016 O

## EXHIBIT 1

# REVISED PROJECT PHASING MAP

## SUB-PROJECTS 1 - 18

NOT TO SCALE

