



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Bruno Pigott**  
*Commissioner*

March 9, 2021

## VIA ELECTRONIC MAIL

The Honorable Daniel Rickord, Mayor  
City of Decatur  
172 North Second Street  
Decatur, Indiana 46733

Dear Mayor Rickord:

Re: CSO Compliance Plan  
Implementation Schedule  
City of Decatur  
NPDES Permit No. IN0039314  
Agreed Order No. 2012-20621-W  
Adams County

The Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) has conducted a review of the City of Decatur's letter dated February 19, 2021 and revised Combined Sewer Overflow (CSO) Compliance Plan Implementation Schedule dated February 23, 2021. With this letter, IDEM grants approval of the revised CSO Compliance Plan Implementation Schedule (copy enclosed).

The projects within the revised CSO Compliance Plan Implementation Schedule will not change; however, dates associated with Phase 3A (targeted sewer system investigation and remediation), Phase 3B (post construction monitoring of sewer system remediation), and Phase 4 (new wet weather pump station and force main, new wet weather storage tank, and screening system at CSO 011) will change. Due to the additional time needed to complete the work in Phase 3A, annual progress reports are required and have been added to the schedule. The City cites the Covid 19 pandemic and the Phase 3A work taking longer than originally expected as the need for the schedule revision.

The revised CSO Compliance Plan Implementation Schedule does not change the level of control in the original Long Term Control Plan (LTCP), which is to capture and provide full treatment of flows from storm events up to and including the 10-year, 1-hour design storm. Full implementation of the revised schedule will extend the implementation end date by three and a half years. IDEM staff will share the revised CSO Compliance Plan Implementation Schedule with the Water Enforcement Section to have the schedule enforceable under the current Agreed Order Case No. 2012-20621-W. The City of Decatur shall implement the schedule accordingly. All other terms and conditions of the Agreed Order remain in effect.



The Honorable Daniel Rickord, Mayor  
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Please contact Kara Wendholt at 317-233-5961 or by e-mail at [kwendhol@idem.in.gov](mailto:kwendhol@idem.in.gov) if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Leigh Voss". The signature is written in a cursive, flowing style.

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

Enclosure

cc: Samantha Groce, IDEM Water Enforcement Section Chief  
Karey Fuelling, Wastewater Superintendent  
Don Bergdall, Civil Infrastructure Manager  
Jim Garrard, AECOM

**Decatur, Indiana****LTCP Agreed Order Milestone Dates**

<b>Description</b>	<b>Completion Dates</b>
Phase 1 – Submit LTCP Compliance Plan	2/8/2015
Phase 2 – Storage Tank Modification & Interceptor Cleaning and CCTV (Early Action Projects)	10/1/2014
Phase 3 – Bidding	4/30/2016
Phase 3 – Construction (14 months)	6/30/2017
Phase 3 – Post Construction Monitoring	6/30/2018
Phase 3A – Targeted Sewer System Assessment/Investigation and Remediation	3/1/2024
Phase 3A –Yearly Progress Reports	7/1/2022 7/1/2023 7/1/2024
Phase 3B – Post Construction Monitoring	12/31/2024
Phase 4 – Update Phase 4 Plan	6/1/2025
Phase 4 – Survey, Engineering, Permitting, and Land Acquisition	6/1/2026
Phase 4 – Bidding	8/1/2026
Phase 4 – Construction (16 months)	12/1/2027
Phase 4 – Post Construction Monitoring	10/1/2028

Revised 2/23/2021

**City of Decatur**

172 North Second Street  
Decatur, IN 46733  
Tel (260) 724-7171  
drickord@decaturin.org

**Daniel Rickord, Mayor**

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February 19, 2021

Kara Wendholt  
Indiana Department of Environmental Management  
Office of Water Quality  
CSO Program  
100 N. Senate Avenue  
MC 65-42, IGCN 1255  
Indianapolis, IN 46204

Re: LTCP Agreed Order Compliance Plan: Overview of Phase 3A Targeted  
Sewer System Assessment/Investigation and Remediation work  
City of Decatur  
NPDES Permit No. IN0039314  
Case No. 2012-20621-W  
Adams County

Dear Ms. Wendholdt:

Decatur has worked hard to investigate and remediate portions of the sanitary sewer system per the Compliance Plan amendment executed in March 2019, and this work has not only improved the condition and reliability of our system but has also made a tremendous positive impact on combined sewer overflows. Below is a summary of the work completed to date, the impact to our system, and a request for additional time to complete the assessment, investigation and remediation of Basins 2 and 3.

In March 2019, Decatur purchased a CCTV truck to allow us to aggressively tackle investigating the condition of our sewer system. From March 2019 to December 2020, we have cleaned 17,500 feet of line and televised 15,000 feet. Most of this work was completed in Basin 1 (Upstream of CSO 11). We have also begun investigative and remediation efforts in Basin 2. To date, most of the work in Basin 2 has been completed in laterals tributary of the main trunk-line sewer. Our



investigation led to extensive remediation work in Basin 1, removing storm sewer and farm drainage cross connections with the sanitary system, rehabilitating 21 manholes, replacing 1,300 feet of main, installing 500 feet of new storm sewer, while rehabbing and eliminating numerous taps. The efforts in Basin 2 have led to manhole rehabilitations, and the identification of additional projects we plan to complete this year. We fully expect to identify additional areas in need of repair in Basin 2 as we continue with our investigative efforts.

Flow monitoring conducted after completion of the work in Basin 1 in the spring of 2020, showed dramatic improvements due to the removal of I&I from our system. The flow monitoring and updated system models show a peak flow reduction just upstream of CSO 11 of over 50% during the 10-year, 1- hour storm event. Peak flows decreased from 10.9 MGD to 5.2 MGD as a result of the work completed in Basin 1. Consequently, the work in Basin 1 has kept and will continue to keep a significant amount of combined sewage out of the St. Mary's River. It will also allow us to reduce the size of a proposed pump station and force main as a part of the final, Phase 4 solution by approximately fifty percent. See the attached modeling hydrographs for the 10-year 1-hour storm event. Additionally, in May of 2020, we added an additional 6" stop-log to raise the weir at CSO 011. Since this change, we have experienced only one overflow at this location.

Decatur has made great progress investigating and remediating our system. We are pleased with the tremendous results in the Basin 1 watershed, which have been confirmed by the initial flow monitoring and computer model updates. Even with these great successes, we respectfully request additional time to complete the work in Basins 2 and 3. Like the rest of the country, in the last year Decatur has been dramatically impacted by the Covid 19 pandemic. This severely limited our ability to do as much I&I work as was planned. For months, crews that typically perform field work were not allowed to work in close proximity to each other or even access the sewer system for fear of Covid 19 exposure. Additionally, staff was forced to work in alternating weekly schedules to slow the spread and stay in compliance with social distancing guidelines. Unfortunately, even with our best efforts, numerous city staff became infected. The resulting missed time due to sickness and required quarantines caused less investigative and remediation work to be completed in Basin 2.

In addition to the delay caused by Covid 19, the time it takes to do the televising, cleaning and remediation of our system is simply taking longer than expected. We believe the schedule we are proposing reflects a more accurate and reasonable projection of where we are today and the time it takes to do the work. The proposed schedule is attached to this letter. To further show our commitment to improving our system, this month, Decatur's Board of Public Works and Safety

approved \$383,000 for the purchase of a new vac truck, which should arrive in April 2021. This will greatly speed up future work in Basin 2 and 3.

We are committed to improving our sanitary sewer system and reducing combined sewer overflows into the St. Mary's River while providing quality, reliable and cost-effective service to our rate paying customers. We are convinced we can best accomplish these goals with additional time to continue our pursuit of reducing I&I in our system prior to embarking on Phase 4 of the CSO Compliance Plan.

We look forward to discussing Decatur's progress and future implementation of the plan on Tuesday, February 23<sup>rd</sup>.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel Rickord", with a stylized flourish at the end.

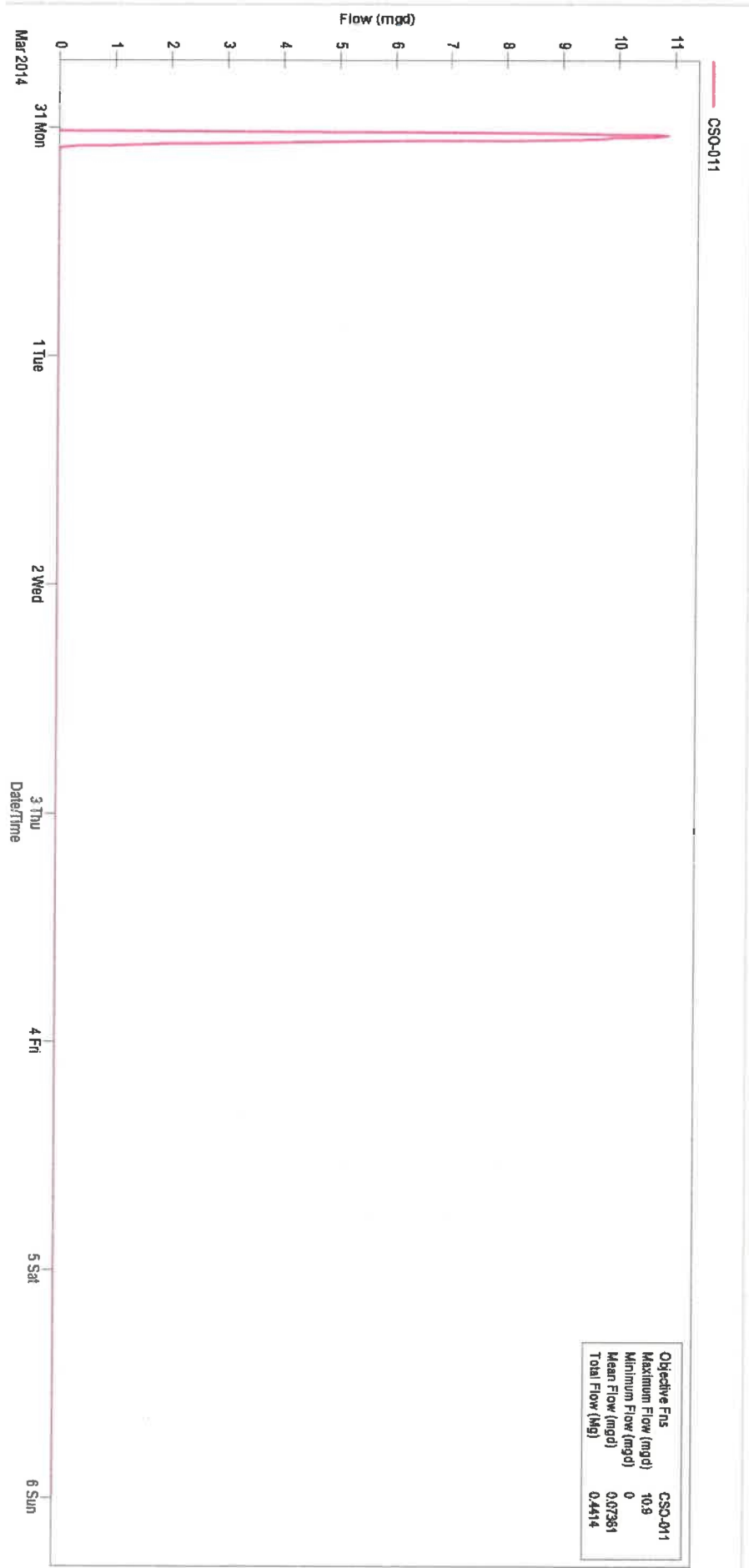
Daniel Rickord, Mayor

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Revised 2/23/2021

Decatur, IN CSO 011- Recalibration – Pre I/I Rehab: 10-year, 1-hour Rain Event – Overflow Volume: 0.44 MG



Decatur, IN CSO 011- Recalibration – Post I/I Rehab: 10-year, 1-hour Rain Event – Overflow Volume: 0.18 MG

