

3. Compliance Data Section

Indiana Department of Environmental Management
Office of Water Quality – Rm 1255
Compliance Data Section
100 N. Senate Avenue
Indianapolis, Indiana 46204-2251

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INDIANA UTILITY
REGULATORY COMMISSION

The following correspondence shall be sent to the Compliance Data Section:

- a. Discharge Monitoring Reports (DMRs)
- b. Monthly Reports of Operation (MROs)
- c. Monthly Monitoring Reports (MMRs)
- d. CSO MROs
- e. Gauging station and flow meter calibration documentation
- f. Compliance schedule progress reports
- g. Completion of Construction notifications
- h. Whole Effluent Toxicity Testing reports
- i. Toxicity Reduction Evaluation (TRE) plans and progress reports
- j. Bypass/Overflow Reports
- k. Anticipated Bypass/Overflow Reports

4. Pretreatment Group

Indiana Department of Environmental Management
Office of Water Quality – Rm 1255
Compliance Data Section – Pretreatment Group
100 N. Senate Avenue
Indianapolis, Indiana 46204-2251

The following correspondence shall be sent to the Pretreatment Group:

- a. Organic Pollutant Monitoring Reports
- b. Significant Industrial User (SIU) Quarterly Noncompliance Reports
- c. Pretreatment Program Annual Reports

- d. Sewer Use Ordinances
- e. Enforcement Response Plans (ERP)
- f. Sludge analytical results

PART III

REQUIREMENT TO OPERATE
A PRETREATMENT PROGRAM

A. CONDITIONS

The permittee, hereinafter referred to as the “Control Authority,” is required to operate the approved industrial pretreatment program for the City of Indianapolis approved on March 3, 1994 and December 29, 2010, and any subsequent modifications approved up to the issuance of this permit. The permittee was approved by EPA for direct delegation of the Pretreatment program on March 29, 2016. To ensure the program is operated as approved and consistent with 327 IAC 5-16 through 5-21, the following conditions and reporting requirements are hereby established. The Control Authority (CA) shall:

1. Legal Authority

The CA shall develop, enforce and maintain adequate legal authority in its Sewer Use Ordinance (SUO) to fully implement the pretreatment program in compliance with State and local law. As part of this requirement, the CA shall develop and maintain local limits as necessary to implement the prohibitions and standards in 327 IAC 5-18.

2. Permit Issuance

In accordance with 327 IAC 5-19-3(1) the CA is required to issue/reissue permits to Significant Industrial User(s) (SIU) as stated in the SUO. The CA must issue permits to new SIUs prior to the commencement of discharge. A SIU is defined in the SUO.

3. Industrial Compliance Monitoring

The CA is required to conduct inspection, surveillance, and monitoring activities to determine SIU compliance status with the approved program and the SUO independent of data supplied by the SIU. SIU compliance monitoring performed by the CA will be conducted in accordance with the program plan or yearly program plan. SIUs will be inspected once per year, at a minimum.

4. Enforcement

The CA is required to initiate the appropriate enforcement action against a SIU violating any provision of the SUO and/or discharge permit in accordance with the Enforcement Response Procedures (ERP) adopted by the CA. The CA must investigate violations by collecting and analyzing samples and collecting other information with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions in accordance with 40 CFR 403.8(f)(1)(iii) and 327 IAC 5-19-3(1)(F).

5. SIU Quarterly Noncompliance Report

The CA is required to report the compliance status of each SIU quarterly. The report is due by the 28th of the following months: May, August, November, and February of each year. The report shall include a description of corrective actions that have or will be taken by the CA and SIU to resolve the noncompliance situations. This report is to be sent to the Compliance Branch of the Office of Water Quality.

6. Public Participation and Annual Publishing of SIUs in Significant Noncompliance

The CA is required to comply with the public participation requirements under 40 CFR 25 and 327 IAC 5-19-3(2)(L). The CA must publish annually, by April 30, in the largest daily newspaper in the area, a list of SIUs that have been in Significant Noncompliance (SNC) with the SUO during the calendar year. The CA shall include in the ANNUAL REPORT a list of the SIUs published along with the proof of publication.

7. Industrial User Survey

The CA shall prepare and maintain a list of its Industrial Users meeting the criteria in 40 CFR 403.3(v)(1). The list shall identify the criteria in 40 CFR 403.3(v)(1) applicable to each Industrial User and where applicable, shall also indicate whether the CA has made a determination pursuant to 40 CFR 403.3(v)(2) that such Industrial User should not be considered a Significant Industrial User. Modifications to the list shall be submitted to the Approval Authority pursuant to 40 CFR 403.12(i)(1).

8. Annual Report

The CA is required to submit an annual report to the Pretreatment Group and EPA Region 5 by April 1, of each year. The CA shall also include a copy of the updated industrial user survey list. The annual report will be submitted in accordance with 40 CFR 403.12(i) to the following addresses:

Pretreatment Program Manager
U.S. EPA Region 5, WN-15J
NPDES Programs Branch
77 W. Jackson Blvd.
Chicago, IL 60604

Indiana Department of Environmental Management
Office of Water Quality – Rm 1255
Compliance Data Section – Pretreatment Group
100 North Senate Avenue
Indianapolis, IN 46204-2251

9. Records Retention

Pursuant to 327 IAC 5-16-5.3(b), the CA shall retain any pretreatment reports from an industrial user a minimum of three (3) years and shall make such reports available for inspection and copying by IDEM or the U.S. EPA. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the industrial user, the operation of the POTW pretreatment program or when requested by IDEM or the U.S. EPA.

10. Confidentiality

The CA is required to comply with all confidentiality requirements set forth in 40 CFR 403.14, as well as the procedures established in the SUO.

11. Program Resources

Pursuant to 327 IAC 5-19-3(3), The CA shall maintain sufficient resources and qualified personnel to carry out the pretreatment program requirements.

12. Interjurisdictional Agreements

The CA must maintain sufficient legal authority to ensure compliance with all applicable pretreatment limits and requirements by all SIUs discharging to the POTW, including SIUs within governmental jurisdictions outside the immediate jurisdiction of the POTW. The CA must maintain the interjurisdictional agreements necessary to ensure full compliance by SIUs located within other jurisdictions as discussed in 40 CFR 403.8(f)(1).

13. POTW Pretreatment Program Revision Requirements

The permittee shall re-evaluate its SUO to determine whether it provides adequate legal authority to fully implement the pretreatment program. Any modifications to the permittee's SUO shall be consistent with U.S. EPA's EPA Model Pretreatment Ordinance, available at: http://cfpub.epa.gov/npdes/docs.cfm?program_id=3&view=allprog&sort=name#model_ordinance. If any changes are deemed necessary, the permittee shall notify U.S. EPA Region 5 and IDEM Pretreatment group.

In addition, the re-evaluation must include a technical re-evaluation of the local limits in accordance with 40 CFR 122.44(j)(2)(ii). The CA is to conduct the local limitations technical evaluation consistent with U.S. EPA's Local Limits Development Guidance (July 2004) document and U.S. EPA Region 5 Local Limits Spreadsheet (February 2011) available at: <http://www.epa.gov/r5water/npdestek/npdprta.htm>. The permittee submitted the local limit re-evaluation to U.S. EPA Region 5 and IDEM Pretreatment Group for review in May 2018.

14. Program Modification

Pursuant to 327 IAC 5-19-6 and 40 CFR 403.18, any significant proposed program modification shall be submitted to the Pretreatment Group and the U.S. EPA for approval. A significant modification shall include, but not be limited to, any change in the SUO, major modification in the approval program's administrative procedures, a significant reduction in monitoring procedures, a significant change in the financial/revenue system, a significant change in the local limitations contained in the SUO, and a change in the industrial user survey.

NOTE: A summary of the revisions to the General Pretreatment Regulations (40 CFR 403) is available from the Pretreatment Group of the Compliance Data Section.

ATTACHMENT A

Precipitation Related Combined Sewer Overflow Discharge Authorization Requirements

I. Discharge Authorization

A. Combined Sewer Overflows are point sources subject to both technology-based and water quality-based requirements of the Clean Water Act and state law. The permittee is authorized to have wet weather discharges from outfalls listed below subject to the requirements and provisions of this permit, including Attachment A.

<u>Outfall Number</u>	<u>Location (Latitude/Longitude)</u>	<u>Receiving Water</u>
003	Raw Wastewater Overflow prior to Southport AWT Plant's headworks 39° 40' 10.71" N; 86° 13' 29.36" W	Little Buck Creek
008	Raw Wastewater Overflow prior to Belmont AWT Plant's headworks 39° 43' 41.58" N; 86° 11' 17.03" W	White River
011	Minnesota Street & Pershing Avenue 39° 44' 36.39" N; 86° 12' 3.85" W	Big Eagle Creek
012	Raymond Street & West Street 39° 44' 11.91" N; 86° 10' 9.30" W	White River
013	Meridian Street & Adler Street 39° 44' 31.62" N; 86° 10' 4.96" W	White River
015	Southern Avenue & Manker Avenue 39° 43' 47.81" N; 86° 8' 30.89" W	Bean Creek
016	Shelby Street & Willow Drive 39° 43' 43.90" N; 86° 8' 22.59" W	Bean Creek
017	Boyd Avenue & Nelson Avenue 39° 43' 44.22" N; 86° 8' 4.19" W	Bean Creek
019	Pleasant Run Parkway North Drive & Meridian Street 39° 43' 55.47" N; 86° 9' 28.99" W	Pleasant Run
020	Pleasant Run Parkway North Drive & Pennsylvania Street 39° 43' 58.04" N; 86° 9' 23.24" W	Pleasant Run
021	Pleasant Run Parkway North Drive & Ransdell Street 39° 44' 5.64" N; 86° 9' 6.43" W	Pleasant Run

022	Pleasant Run Parkway North Drive & Raymond Street 39° 44' 14.03" N; 86° 8' 46.63" W	Pleasant Run
023	Pleasant Run Parkway North Drive & Iowa Street 39° 44' 37.28" N; 86° 8' 34.65" W	Pleasant Run
025	Pleasant Run Parkway North Drive & Shelby Street 39° 44' 41.41" N; 86° 8' 23.61" W	Pleasant Run
027	Pleasant Run Parkway South Drive & Cottage Avenue 39° 44' 50.94" N; 86° 8' 6.11" W	Pleasant Run
028	Pleasant Run Parkway South Drive & State Street 39° 44' 58.27" N; 86° 7' 50.23" W	Pleasant Run
029	Orange Street & Randolph Street 39° 44' 56.14" N; 86° 7' 39.39" W	Pleasant Run
030	Pleasant Run Parkway South Drive & Randolph Street 39° 44' 56.62" N; 86° 7' 37.82" W	Pleasant Run
031	Pleasant Run Parkway South Drive & Churchman Avenue 39° 44' 57.62" N; 86° 7' 28.01" W	Pleasant Run
032	Morris Street & Warman Avenue 39° 45' 3.18" N; 86° 12' 26.79" W	Big Eagle Creek
033	Vermont Street & Somerset Avenue 39° 46' 17.94" N; 86° 13' 18.78" W	Little Eagle Creek
034	Michigan Street & Dorman Street 39° 46' 25.48" N; 86° 8' 20.47" W	Pogues Run
035	Arsenal Avenue & 10th Street 39° 46' 52.53" N; 86° 7' 58.63" W	Pogues Run
036	Nowland Avenue & Tecumseh Street 39° 47' 8.28" N; 86° 7' 34.60" W	Pogues Run
037	Washington Street & Geisendorff Street 39° 46' 2.77" N; 86° 10' 22.69" W	White River
038	New York Street & Agnes Street 39° 46' 8.53"N; 86° 10' 33.41" W	White River

A38	Davidson Street & Washington Street 39° 46' 0.95" N; 86° 8' 44.42" W	Pogues Run
039	New York Street & Beauty Avenue 39° 46' 12.13" N; 86° 10' 46.86" W	White River
040	New York Street & Koehne Street 39° 46' 17.61" N; 86° 11' 12.02" W	White River
041	White River Parkway West Drive & Michigan Street 39° 46' 28.87" N; 86° 11' 21.28" W	White River
042	Saint Clair Street & Lynn Avenue 39° 46' 43.64" N; 86° 11' 28.66" W	White River
043	Harding Street & Waterway Boulevard 39° 47' 8.41" N; 86° 11' 15.24" W	White River
044	Waterway Boulevard & Riverside Drive 39° 47' 11.18" N; 86° 11' 27.58" W	White River
045	White River Parkway West Drive & Belmont Avenue 39° 47' 9.26" N; 86° 11' 40.65" W	White River
046	Lafayette Road & 19th Street 39° 47' 29.51" N; 86° 12' 3.85" W	White River
049	Stadium Drive & Fall Creek 39° 46' 54.82" N; 86° 10' 38.65" W	Fall Creek
050	Fall Creek Boulevard & Burdsal Parkway 39° 48' 1.67" N; 86° 10' 27.79" W	Fall Creek
50A	Northwestern Avenue & 24th Street 39° 48' 1.63" N; 86° 10' 27.67" W	Fall Creek
051	Capitol Avenue & 22nd Street 39° 47' 50.28" N; 86° 9' 44.30" W	Fall Creek
052	Fall Creek Boulevard & Boulevard Place 39° 48' 5.86" N; 86° 9' 45.88" W	Fall Creek
053	Fall Creek Parkway North Drive & Illinois Street 39° 48' 10.49" N; 86° 9' 32.35" W	Fall Creek

054	Fall Creek Parkway North Drive & Meridian Street 39° 48' 13.63" N; 86° 9' 24.44" W	Fall Creek
055	28th Street & Talbot Street 39° 48' 18.95" N; 86° 9' 15.17" W	Fall Creek
057	28th Street & Washington Boulevard 39° 48' 20.83" N; 86° 9' 6.81" W	Fall Creek
058	28th Street & New Jersey Street 39° 48' 20.91" N; 86° 9' 2.54" W	Fall Creek
059	Fall Creek Parkway North Drive & Central Avenue 39° 48' 21.18" N; 86° 8' 57.93" W	Fall Creek
060	Sutherland Avenue & Central Avenue 39° 48' 20.16" N; 86° 8' 56.30" W	Fall Creek
061	Fall Creek Parkway North Drive & Ruckle Street 39° 48' 22.82" N; 86° 8' 53.60" W	Fall Creek
062	Guilford Avenue & 30th Street 39° 48' 37.42" N; 86° 8' 30.62" W	Fall Creek
063	Fall Creek Parkway North Drive & 32nd Street 39° 48' 50.34" N; 86° 8' 36.73" W	Fall Creek
63A	Fall Creek Parkway North Drive & 32nd Street 39° 48' 50.17" N; 86° 8' 36.92" W	Fall Creek
064	Winthrop Avenue & 34th Street 39° 49' 0.45" N; 86° 8' 22.02" W	Fall Creek
065	Sutherland Avenue & 34th Street 39° 49' 3.79" N; 86° 8' 14.62" W	Fall Creek
066	Fall Creek Boulevard & Balsam Avenue 39° 49' 15.64" N; 86° 8' 9.85" W	Fall Creek
072	Pleasant Run Parkway North Drive & Saint Peter Street 39° 45' 0.15" N; 86° 7' 19.94" W	Pleasant Run

073	Pleasant Run Parkway North Drive & Keystone Avenue 39° 45' 1.90" N; 86° 7' 15.39" W	Pleasant Run
074	Pleasant Run Parkway North Drive & Prospect Street 39° 45' 8.83" N; 86° 7' 3.62" W	Pleasant Run
075	Pleasant Run Parkway North Drive & Southeastern Avenue 39° 45' 28.64" N; 86° 6' 30.89" W	Pleasant Run
076	Pleasant Run Parkway North Drive & English Avenue 39° 45' 35.25" N; 86° 6' 17.67" W	Pleasant Run
077	Pleasant Run Parkway North Drive & Sherman Drive 39° 45' 47.17" N; 86° 6' 7.41" W	Pleasant Run
078	Pleasant Run Parkway North Drive & Brookville Road 39° 45' 50.24" N; 86° 5' 43.04" W	Pleasant Run
080	Pleasant Run Parkway North Drive & Wallace Avenue 39° 46' 1.86" N; 86° 5' 18.80" W	Pleasant Run
081	Pleasant Run Parkway North Drive & Riley Avenue 39° 46' 10.54" N; 86° 5' 9.28" W	Pleasant Run
083	Hawthorne Lane & Lowell Avenue 39° 46' 23.31" N; 86° 4' 47.51" W	Pleasant Run
084	Pleasant Run Parkway North Drive & Michigan Street 39° 46' 31.88" N; 86° 4' 39.79" W	Pleasant Run
085	Pleasant Run Parkway North Drive & Ritter Avenue 39° 46' 32.51" N; 86° 4' 25.67" W	Pleasant Run
086	Pleasant Run Parkway North Drive & Ritter Avenue 39° 46' 32.96" N; 86° 4' 25.73" W	Pleasant Run
087	Pleasant Run Parkway North Drive & Audubon Road 39° 46' 35.36" N; 86° 4' 11.34" W	Pleasant Run

088	Pleasant Run Parkway North Drive & Graham Avenue 39° 46' 33.20" N; 86° 4' 6.42" W	Pleasant Run
089	Pleasant Run Parkway North Drive & Arlington Avenue 39° 46' 33.31" N; 86° 3' 50.71" W	Pleasant Run
89A	North Arlington Avenue 39° 46' 33.31" N; 86° 3' 50.40" W	Pleasant Run
090	Lowell Avenue & Sheridan Avenue 39° 46' 30.05" N; 86° 3' 36.47" W	Pleasant Run
091	Pleasant Run Parkway South Drive & Kenmore Road 39° 46' 30.70" N; 86° 3' 31.05" W	Pleasant Run
092	Pleasant Run Parkway South Drive & Ridgeview Drive 39° 46' 31.79" N; 86° 3' 27.10" W	Pleasant Run
095	Brookside Parkway North Drive & Coyner Avenue 39° 47' 11.98" N; 86° 7' 27.38" W	Pogues Run
096	Brookside Parkway South Drive & Nowland Avenue 39° 47' 11.58" N; 86° 7' 27.32" W	Pogues Run
097	Brookside Parkway South Drive & Keystone Avenue 39° 47' 10.79" N; 86° 7' 14.53" W	Pogues Run
098	Tacoma Avenue & Nowland Avenue 39° 47' 9.95" N; 86° 7' 10.63" W	Pogues Run
099	Brookside Parkway South Drive & Temple Avenue 39° 47' 7.91" N; 86° 7' 4.80" W	Pogues Run
100	Brookside Parkway South Drive & Rural Street 39° 47' 8.71" N; 86° 7' 2.10" W	Pogues Run
101	Sherman Drive & Brookside Parkway North Drive 39° 47' 29.70" N; 86° 6' 13.71" W	Pogues Run
102	Forest Manor Avenue & 19th Street 39° 47' 32.38" N; 86° 6' 2.57" W	Pogues Run

103	Sherman & Denwood Drs. Lift Station 39° 49' 44.06" N; 86° 6' 9.66" W	Meadow Brook
106	Pleasant Run Parkway North Drive & Orange Street 39° 44' 54.61" N; 86° 7' 31.23" W	Pleasant Run
107	Pleasant Run Parkway North Drive & Saint Paul Street 39° 44' 58.85" N; 86° 7' 23.59" W	Pleasant Run
108	Pleasant Run Parkway North Drive & Saint Paul Street 39° 44' 58.10" N; 86° 7' 23.75" W	Pleasant Run
109	Pleasant Run Parkway North Drive & Churchman Street 39° 44' 58.35" N; 86° 7' 27.45" W	Pleasant Run
115	Henry Street & Kentucky Avenue 39° 45' 23.85" N; 86° 10' 17.00" W	Pogues Run
116	Meikel Street & Ray Street 39° 45' 16.14" N; 86° 10' 20.51" W	White River
117	Southern Avenue & White River 39° 43' 46.37" N; 86° 10' 26.24" W	White River
118	White River Parkway East Drive & West Street 39° 44' 38.81" N; 86° 10' 8.12" W	White River
119	Pleasant Run Parkway South Drive & Beecher Street 39° 44' 30.14" N; 86° 8' 34.13" W	Pleasant Run
120	Pleasant Run Parkway South Drive & Southern Avenue 39° 43' 46.22" N; 86° 9' 57.35" W	Pleasant Run
125	Meridian Street & South Street 39° 45' 41.37" N; 86° 9' 29.71" W	Pogues Run
127	1325 South State Street 39° 44' 57.71" N; 86° 7' 50.00" W	Pleasant Run
128	Senate Avenue & Merrill Street 39° 45' 30.39" N; 86° 9' 55.15" W	Pogues Run
129	Meridian Street & Merrill Street 39° 45' 34.38" N; 86° 9' 30.23" W	Pogues Run

130	Manual High School 39° 44' 5.10" N; 86° 9' 6.65" W	Pleasant Run
131	Fall Creek Boulevard & Capitol Avenue 39° 48' 9.02" N; 86° 9' 41.14" W	Fall Creek
132	Fall Creek Parkway North Drive & Pennsylvania Street 39° 48' 16.44" N; 86° 9' 19.54" W	Fall Creek
133	Market Street & Pine Street 39° 46' 5.27" N; 86° 8' 40.59" W	Pogues Run
135	Orchard Avenue & 39th Street 39° 49' 36.26" N; 86° 7' 45.30" W	Fall Creek
136	New York Street & Dorman Street 39° 46' 16.03" N; 86° 8' 25.95" W	Pogues Run
137	Pine Street & Ohio Street 39° 46' 10.15" N; 86° 8' 32.67" W	Pogues Run
138	College Avenue & Washington Street 39° 46' 0.43" N; 86° 8' 44.86" W	Pogues Run
141	Winthrop Avenue & 38th Street 39° 49' 30.81" N; 86° 7' 53.05" W	Fall Creek
142	College Avenue & 38th Street 39° 49' 0.45" N; 86° 8' 21.91" W	Fall Creek
143	Forest Manor Avenue & 21st Street 39° 47' 45.22" N; 86° 5' 54.36" W	Pogues Run
145	Raymond Street & Kentucky Avenue 39° 44' 9.47" N; 86° 11' 46.80" W	Big Eagle Creek
147	White River Parkway West Drive & Vermont Street 39° 46' 22.16" N; 86° 11' 17.19" W	White River
148	Pleasant Run Parkway North Drive & Madison Avenue 39° 44' 1.77" N; 86° 9' 15.96" W	Pleasant Run
149	Pleasant Run Parkway South Drive & Garfield Drive 39° 44' 22.05" N; 86° 8' 46.31" W	Pleasant Run

150	Pleasant Run Parkway North Drive & Raymond Street 39° 44' 12.12" N; 86° 8' 49.88" W	Pleasant Run
151	Pleasant Run Parkway North Drive & Beecher Street 39° 44' 30.15" N; 86° 8' 33.45" W	Pleasant Run
152	Pine Street & Ohio Street 39° 46' 10.73" N; 86° 8' 32.28" W	Pogues Run
153	Illinois Avenue & Merrill Street 39° 45' 33.89" N; 86° 9' 36.86" W	Pogues Run
154	Pleasant Run Parkway North Drive & Michigan Street 39° 46' 29.20" N; 86° 4' 43.41" W	Pleasant Run
205	Boulevard Place & Westfield Boulevard 39° 51' 9.58" N; 86° 9' 51.33" W	White River
210	Indiana Avenue & 10th Street 39° 46' 53.05" N; 86° 10' 35.70" W	Fall Creek
213	2900 North Hillside 39° 48' 31.34" N; 86° 8' 34.29" W	Fall Creek
216	Critenden Avenue & 42nd Street 39° 49' 55.81" N; 86° 7' 31.90" W	Fall Creek
217	Gadsden Street & Lyons Avenue 39° 43' 33.99" N; 86° 13' 58.57" W	State Ditch
218	Gadsden Street & Fleming Street 39° 43' 37.26" N; 86° 14' 13.98" W	State Ditch
223	Victoria Street & Warman Avenue 39° 45' 35.29" N; 86° 12' 37.65" W	Big Eagle Creek
224	Pleasant Run Parkway North Drive & Washington Street 39° 46' 12.92" N; 86° 5' 3.49" W	Pleasant Run
227	5700 Emich 39° 46' 36.37" N; 86° 4' 15.22" W	Pleasant Run
228	Michigan Street & Graham Avenue 39° 46' 32.77" N; 86° 4' 6.64" W	Pleasant Run

229	Pleasant Run Parkway North Drive & Arlington Avenue 39° 46' 32.92" N; 86° 3' 51.22" W	Pleasant Run
235	Shelby Street & Markwood Avenue 39° 41' 53.32" N; 86° 8' 17.02" W	Lick Creek
275	4945 South Foltz 39° 41' 30.73" N; 86° 13' 26.55" W	White River

Monitoring for the purpose of reporting on the CSO Monthly Report of Operation (State Form 50546 (R4/9-15)) shall be conducted at a location representative of untreated CSO discharges. Monitoring from a CSO regulator structure contributing flow to the CSO outfall is acceptable provided flows at this location are representative and comprised of untreated CSO flows ultimately discharged through the CSO outfall. Monitoring at the CSO outfall is considered representative except in those instances where non-CSO flows (treated effluents, separate stormwater, etc.) are also discharged through a common outfall. All non-CSO flows shall be excluded from reporting on the CSO Monthly Report of Operation.

II. Wet Weather Treatment Facility Effluent Limitations and Monitoring Requirements

- A. The permittee is authorized to discharge treated combined sewage from Outfall 155 into the White River when the applicable portion of the collection system is maximized. The Wet Weather Treatment Facility is located near the intersection of 56th and Westfield Blvd. Outfall 155 is located at Latitude: 39° 51' 15.73" N; Longitude: 86° 9' 46.11" W. Any discharge from Outfall 155 is subject to the requirements and provisions of this permit including the following requirements:

TABLE 5

<u>Parameter [7]</u>	<u>Quantity or Loading</u>		<u>Quality or Concentration</u>			<u>Monitoring Requirements</u>		
	<u>Daily Maximum</u>	<u>Monthly Average</u>	<u>Units</u>	<u>Daily Maximum</u>	<u>Monthly Average</u>	<u>Unit</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow [1]	Report	Report	MGD	----	----	----	Daily	24-Hr. Total
CBOD ₅	----	----	----	Report	Report	mg/l	Daily	Composite [6]
TSS	----	----	----	Report	Report	mg/l	Daily	Composite [6]

TABLE 6

<u>Parameter [7]</u>	<u>Quality or Concentration</u>				<u>Monitoring Requirements</u>	
	<u>Daily Minimum</u>	<u>Monthly Average</u>	<u>Daily Maximum</u>	<u>Units</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
pH [8]	Report	----	Report	s.u.	Daily	Grab
TRC [2] [3]	----	0.01	0.02	mg/l	Daily	Grab
<i>E. coli</i> [4] [5]	----	125	235	cfu /100 ml	Daily	Grab

[1] Effluent flow measurement is required per 327 IAC 5-2-13. The flow meter(s) shall be calibrated at least once annually.

- [2] The effluent shall be disinfected on a continuous basis such that violations of the applicable bacteriological limitations do not occur from April 1 through October 31, annually. If the permittee uses chlorine for any reason, at any time including the period from November 1 through March 31, then the limits and monitoring requirements in Table 2 for Total Residual Chlorine (TRC) shall be in effect whenever chlorine is used.
- [3] In accordance with 327 IAC 5-2-11.1(f), compliance with this permit will be demonstrated if the measured effluent concentrations are less than the limit of quantitation (0.06 mg/l). If the measured effluent concentrations are above the water quality-based permit limitations and above the Limit of Detection (LOD) specified by the permit in any of three (3) consecutive analyses or any five (5) out of nine (9) analyses, the permittee is required to reevaluate its chlorination/dechlorination practices to make any necessary changes to assure compliance with the permit limitation for TRC. These records must be retained in accordance with the record retention requirements of Part I.B.8 of this permit.

Effluent concentrations greater than or equal to the LOD but less than the Limit of Quantitation (LOQ) shall be reported on the discharge monitoring report forms as the measured value. A note must be included with the DMR indicating that the value is not quantifiable. Effluent concentrations less than the limit of detection shall be reported on the discharge monitoring report forms as less than the value of the limit of detection. For example, if a substance is not detected at a concentration of 0.01 mg/l, report the value as < 0.01 mg/l. At present, two methods are considered to be acceptable to IDEM, amperometric and DPD colorimetric methods, for chlorine concentrations at the level of 0.06 mg/l.

<u>Parameter</u>	<u>LOD</u>	<u>LOQ</u>
Chlorine	0.02 mg/l	0.06 mg/l

Case-Specific MDL

The permittee may determine a case-specific Method Detection Level (MDL) using one of the analytical methods specified above, or any other test method which is approved by IDEM prior to use. The MDL shall be derived by the procedure specified for MDLs contained in 40 CFR Part 136, Appendix B, and the limit of quantitation shall be set equal to 3.18 times the MDL. Other methods may be used if first approved by the U.S. EPA and IDEM.

- [4] The *E. coli* limitations and monitoring requirements apply from April 1 through October 31 annually. The monthly average *E. coli* value shall be calculated as a geometric mean. IDEM has specified the following methods as allowable for the detection and enumeration of *Escherichia coli* (*E. coli*):
1. Coliscan MF® Method
 2. EPA Method 1603 Modified m-TEC agar
 3. mColi Blue-24®
 4. Colilert® MPN Method or Colilert-18® MPN Method

- [5] For *E. coli*, the daily maximum shall be the geometric mean of all grab samples on any discharge day, provided that 3 or more grab samples are collected. If less than 3 grab samples are taken then the arithmetic mean shall be reported. The *E. coli* monthly average shall be the geometric mean of all grab samples collected during the month, provided that 5 or more grab samples are collected. The goal of the effluent monitoring program is to collect at least 3 grab samples during each discharge event, and the samples shall be collected at shorter intervals at the onset of the event, if the permittee estimates that the event duration may be less than 6 hours.

If there are discharges on four (4) or more days, then the monthly average shall be reported on the Discharge Monitoring Report (DMR). For discharges of four (4) or more days during a calendar month, then the monthly average *E. coli* value shall be calculated as a geometric mean of all grab samples collected and reported on the DMR.

- [6] Effluent composite sampling, either by automatic sampler collecting samples at set intervals or by grab samples collected during discharges from the wet weather treatment component, shall be representative of the discharge and of sufficient quantity to ensure that the parameters of Table 1 of Attachment A can be measured; shall be initiated within 30 minutes from the beginning of a discharge event; and shall continue at intervals determined by the permittee, but no less than every 2 hours during the duration of the event. If an event lasts for more than 24 hours a new sampling period shall be initiated. Analysis for the parameters identified in Table 1 of Attachment A shall be from the composite sample collected as described above.
- [7] For purposes of reporting on a discharge event which lasts less than 24 hours, but occurs during two calendar days, the pollutant concentrations for the event shall be reported as daily values on the day when the majority of the discharge occurred.
- [8] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the minimum or maximum pH value of any individual sample during the month on the Discharge Monitoring Report forms.

- B. The permittee shall monitor and report discharges from Outfall 155 in accordance with Discharge Monitoring Report (DMR) forms and the Monthly Monitoring Report (MMR) for WWTF provided by IDEM.
- C. The Wet Weather Treatment Facility, located at Westfield Blvd and 56th Street, also known as Lift Station 507, is designed to provide 95% capture at a flow rate of 35 MGD with approximately 34 minutes of detention time. Screening/ skimming, disinfection and dechlorination is provided. Flow rates up to 53 MGD have approximately 23 minutes of detention time. Flow rates greater than 53 MGD will receive screening and partial disinfection. Flow rates greater than 160 MGD will bypass the station entirely and be discharged into the White River via outfall 155. In addition, if the level at structure B3 reaches 707.5 feet or greater, the flow will automatically bypass the station; if the river level gets to 706 feet, the station will also automatically be bypassed.

- D. The permittee's approved CSOOP, LTCP and NPDES permit outline the wet weather operating procedures and design capabilities of the WWTP and Wet Weather Treatment Facility. All Wet Weather Treatment Facility discharges shall receive the specified treatment to the extent possible. In conditions where wet weather discharges from the Wet Weather Treatment Facility result from a storm event, rainfall amount, or intensity which exceed the design capacity of the facility, the permittee shall provide documentation that all conditions and requirements expressed in their NPDES permit, including Attachment A, were achieved. All documentation regarding performance of the WWTP and the Wet Weather Treatment Facility during storm events identified above, would be reviewable by IDEM with exercise of enforcement discretion for discharges from Outfall 155 accorded to it under IC 13 – 30 for these storm events.
1. At all times the discharge from any and all CSO outfalls herein shall not cause receiving waters:
 - a. including the mixing zone, to contain substances, materials, floating debris, oil, scum, or other pollutants:
 1. that will settle to form putrescent or otherwise objectionable deposits;
 2. that are in amounts sufficient to be unsightly or deleterious;
 3. that produce color, visible oil sheen, odor, or other conditions in such a degree as to create a nuisance;
 4. which are in amounts sufficient to be acutely toxic to, or otherwise severely injure or kill aquatic life, other animals, plants, or humans;
 5. which are in concentrations or combinations that will cause or contribute to the growth of aquatic plants or algae to such a degree as to create a nuisance, be unsightly, or otherwise impair the designated uses.
 - b. outside the mixing zone, to contain substances in concentrations which on the basis of available scientific data are believed to be sufficient to injure, be chronically toxic to, or be carcinogenic, mutagenic, or teratogenic to humans, animals, aquatic life, or plants.
 2. Dry weather discharges from any portion of the sewer collection system, except WWTP Outfall Numbers 001 and 006, are prohibited. If such a prohibited discharge should occur, the permittee is required to report the discharge in accordance with the provisions in Part II.C.3 of this permit.

III. Monitoring and Reporting Requirements

The permittee shall complete and submit accurate monitoring reports to the Indiana Department of Environmental Management. The permittee shall submit data specified on the CSO Monthly Report of Operation (MRO) for untreated CSO events (State Form 50546 (R4/9-15)), including but not limited to, WWTP data, precipitation data, and performance data for all discharges from untreated CSO Outfalls identified in Part I of this Attachment A. The permittee has developed a hydraulics model of its sewer collection system. The model generates continuous volumes and discharges from each permitted outfall listed in Part I.A of this Attachment A. The permittee shall report those volumes and discharges, as produced by the hydraulics model, semiannually to the Office of Water Quality, Compliance Data Section using NetDMR. The semiannual hydraulic model reports ("Model Reports") shall be prepared for the six (6) month periods of January 1 through June 30, and July 1 through December 31 of each calendar year. The Model Reports shall be submitted six (6) months after the close of the preceding period. All NPDES permit holders are now required to submit their monitoring data to IDEM.

The permittee shall monitor discharges from Outfall 155 in accordance with both Discharge Monitoring Report (DMR) forms and Monthly Monitoring Report (MMR) for WWTF forms provided by IDEM (State Form 56109). Submitted DMRs and MMRs shall contain results obtained during each month (a monitoring period) and shall be submitted no later than 28 days following each completed monitoring period. Discharge data from Outfall 155 shall not be included on the CSO MRO form for untreated CSO events (State Form 50546 (R4/9-15)).

IV. CSO Operational Plan

- A. The permittee shall comply with the following minimum technology-based controls, in accordance with EPA's National CSO Control Policy:
1. The permittee shall implement proper operation and regular maintenance programs for the sewer system and the CSOs. The purpose of the operation and maintenance programs is to reduce the magnitude, frequency and duration of CSOs. The programs shall consider regular sewer inspections; sewer, catch basin, and regulator cleaning; equipment and sewer collection system repair or replacement, where necessary; and disconnection of illegal connections.
 2. The permittee shall implement procedures that will maximize the use of collection system for wastewater storage that can be accommodated by the storage capacity of the collection system in order to reduce the magnitude, frequency and duration of CSOs.
 3. The permittee shall review and modify, as appropriate, its existing pretreatment program to minimize CSO impacts from non-domestic users. The permittee shall identify all industrial users that discharge to the collection system upstream of any CSO outfalls; this identification shall also include the pollutants in the industrial user's wastewater and the specific CSO outfall(s) that are likely to discharge the wastewater.
 4. The permittee shall operate the POTW at the maximum treatable flow during all wet weather flow conditions to reduce the magnitude, frequency and duration of CSOs. The permittee shall deliver all flows to the treatment plant within the constraints of the treatment capacity of the POTW.
 5. Dry weather overflows from CSO outfalls are prohibited. Each dry weather overflow must be reported to IDEM as soon as the permittee becomes aware of the overflow. When the permittee detects a dry weather overflow, it shall begin corrective action immediately. The permittee shall inspect the dry weather overflow each subsequent day until the overflow has been eliminated.
 6. The permittee shall implement measures to control solid and floatable materials in CSO discharges.
 7. The permittee shall implement a pollution prevention program focused on reducing the impact of CSOs on receiving waters.
 8. The permittee shall implement a public notification process to inform citizens of when and where CSO discharges occur and their impacts. This notification must also be done in accordance with 327 IAC 5-2.1.
 9. The permittee shall monitor to effectively characterize CSO impacts and the efficacy of CSO controls.
- B. The permittee's implementation of each of the minimum controls in Part IV.A of this Attachment A shall be documented in its approved CSO Operational Plan (CSOOP). The permittee shall update the CSOOP, as necessary, to reflect changes in its operation or maintenance practices; changes to measures taken to implement the above minimum requirements; and changes to the treatment plant

or collection system, including changes in collection system flow characteristics, collection system or WWTP capacity or discharge characteristics (including volume, duration, frequency and pollutant concentration). All updates to the CSOOP must be submitted to IDEM, Office of Water Quality, Municipal NPDES Permits Section for approval.

The CSOOP update(s) shall include a summary of the proposed revisions to the CSOOP as well as a reference to the page(s) that have been modified. Any CSOOP updates shall not result in:

1. a lower amount of flow being sent to and through the plant for treatment, or
2. more discharges (measured either by volume, duration, frequency, or pollutant concentration) occurring from the CSO outfalls.

The permittee shall maintain a current CSO Operational Plan, including all approved updates, on file at the POTW.

V. Sewer Use Ordinance Review/Revision and Enforcement

The permittee's Sewer Use Ordinance must contain provisions which: (1) prohibit introduction of inflow sources to any sanitary sewer; (2) prohibit construction of new combined sewers outside of the existing combined sewer service area; and (3) provide that for any new building the inflow/clear water connection to a combined sewer shall be made separate and distinct from sanitary waste connection to facilitate disconnection of the former if a separate storm sewer subsequently becomes available. The permittee shall continuously enforce these provisions.

VI. Reopening Clauses

- A. This permit may be reopened to address changes in the EPA National CSO Policy or state or federal law.
- B. The permit may be reopened, after public notice and opportunity for hearing, to incorporate applicable provisions of IC 13-18.

Fact Sheet

April 2018

Updated: May 2018

Facility Name:	<i>Belmont Advanced Wastewater Treatment (AWT) Plant</i>	<i>Southport Advanced Wastewater Treatment (AWT) Plant</i>
Address:	2700 South Belmont Ave. Indianapolis, Indiana	3800 West Southport Rd. Indianapolis, Indiana
Receiving Water:	West Fork of the White River	West Fork of the White River

Outfall 001 Location	Latitude:	39° 39' 51" N
Southport AWT Plant	Longitude:	86° 14' 8" W

Outfall 006 Location	Latitude:	39° 43' 5" N
Belmont AWT Plant	Longitude:	86° 11' 35" W

The Belmont AWT Plant Outfall 006 location and the Belmont Primary Effluent Bypass Outfall 007 location were corrected from the last permit. The new locations reflect the actual outfall location information supplied in the NPDES Permit Application submitted for this permit renewal. Bypass Outfall 004, at the Southport AWT Plant, was eliminated during the 2012 improvements to the facility. Therefore, Outfall 004 is not included in the permit renewal.

NPDES Permit No. IN0023183

Background

This is the proposed renewal of the NPDES permit for the Belmont and Southport AWT Plants which was issued on May 8, 2013, and has an expiration date of May 31, 2018. The permittee submitted an application for renewal which was received on November 17, 2017.

Wastewater from the Indianapolis collection system is treated by one of two advanced wastewater treatment (AWT) plants. The Belmont AWT plant receives flow predominantly from the central, west, north and east sides of Marion County. The Southport AWT plant receives flow predominantly from the east and south sides of Marion County and from the City of Greenwood. As further described below, flow from the Belmont AWT can be diverted to the Southport AWT during both wet and dry weather. The sludge generated at the Southport AWT plant is pumped to the Belmont AWT plant for treatment and ultimate disposal. Thus, the two AWT plants function and are operated as a single system. The wastewater collection system is comprised of combined sanitary and storm sewers with 130 Combined Sewer Overflow (CSO) points. Sanitary sewer overflows are strictly prohibited.

Belmont Advanced Wastewater Treatment (AWT) Plant

The Belmont Advanced Wastewater Treatment Plant (Belmont AWT Plant) is a Class IV nitrification facility with screening, grit removal tanks, primary clarifiers, oxygen/air nitrification system (ONS/ANS), final clarifiers, coarse sand mono-media tertiary filters, effluent disinfection by chlorination/dechlorination, ultraviolet (UV) radiation, and effluent flow monitoring.

The Belmont AWT Plant has an average design flow of 120 MGD and a peak design flow of 300 MGD. The Belmont AWT Plant has two wet weather storage basins: a 30-million gallon basin (EQ basin 1) to store primary influent and/or primary effluent during wet weather and a 4-million gallon basin (EQ basin 2) to store primary effluent during wet weather. Sludge treatment includes gravity belt thickening, gravity thickening, equalization, centrifuges dewatering, and incineration or landfilling.

As part of the Indianapolis' CSO Long-Term Control Plan, as amended, the permittee has constructed the Belmont AWT Plant Wet Weather Secondary Treatment (WWST) Expansion Project in 2012, consisting of an Air Nitrification System (ANS), operated in series with the existing ONS, to expand the plant's design peak secondary treatment capacity to 300 MGD. As a result, the existing biological roughing system (BRS) towers have been demolished. In addition, improvements to the AWT facilities include a UV disinfection system to handle peak flows up to 150 MGD and modification of the existing ozone contact tank to be used in the wet weather chlorination/dechlorination disinfection process for flows above 150 MGD and up to 300 MGD.

The mass limits for CBOD₅, TSS, and ammonia-nitrogen at Outfall 006 are based on the peak design flow of 300 MGD.

The Belmont AWT Plant has the following flow diversions located within the facility:

1. Primary Effluent Diversion Structures: A primary effluent diversion structure exists at the 96 Structure/Junction Structure No. 1. This diversion allows primary effluent to be diverted to the EQ basin 2 or the ONS Wet Weather Pump Station. A second primary effluent diversion structure exists at Junction Structure No. 2 which allows primary effluent to be diverted around ANS and directly to the ONS Wet Weather Pump Station.
2. Effluent Filters Diversion: An oxygen nitrification system effluent diversion exists prior to the facility's effluent filters. All or a portion of the oxygen nitrification system effluent can be diverted around the effluent filters to the chlorine contact tanks.

The Belmont AWT Plant has the following flow diversions located in the collection system or at the AWT facility, all of which are capable of diverting flow from the Belmont AWT Plant to the Southport AWT Plant.

1. Southwest (Southern Avenue) Diversion: A raw wastewater flow diversion exists external to the Belmont AWT Plant at the Southwest Diversion Structure located near

Southern Avenue. Raw wastewater may be diverted via a 60-inch diameter gravity sewer to the Southport AWT Plant depending on the system hydraulics and plant capacities. Actual flow rates during wet weather events have been 40 – 45 MGD.

2. Belmont Wet Weather Pump Station (Raw Wastewater): A raw wastewater diversion exists prior to the facility's headworks. Raw wastewater from the Belmont Interceptor may be pumped by Belmont's Wet Weather Pump Station to the Southport AWT Plant via a 42-inch force main to the Tibbs Interceptor. The Wet Weather Pump Station can also pump raw wastewater to Wet Weather Storage Basin No. 1. Depending on the system hydraulics, the pumping capacity is 28-30 MGD.
3. Belmont Wet Weather Pump Station (Primary Effluent): A primary effluent flow diversion exists after the Belmont Primary Clarifiers. Primary effluent stored in Wet Weather Storage Basin No. 1 may be pumped by Belmont's Wet Weather Pump Station to the Southport AWT Plant via a 42-inch force main to the Tibbs Interceptor. Depending on the system hydraulics, the pumping capacity is approximately 28-30 MGD.
4. Gravity Diversion (Primary Influent): A preliminary treatment flow diversion exists prior to the facility's primary clarifiers. Preliminary treatment flow from the diversion may be conveyed by gravity via the 42-inch force main to the Southport AWT Plant via the Tibbs Interceptor. Depending on the system hydraulics, the diversion capacity is 16-18 MGD.
5. Belmont Primary Effluent Pump Station (Primary Effluent): A primary effluent diversion exists after the facility's primary clarifiers. Primary effluent from the primary effluent channel may be pumped by the Belmont Primary Effluent Pump Station (PEPS) to the Southport AWT Plant via the 42-inch force main to the Tibbs Interceptor. Depending on the system hydraulics, the pumping capacity is 30 to 35 MGD. This pump station can also pump primary effluent flow to EQ basin 1.

Southport Advanced Wastewater Treatment (AWT) Plant

The Southport Advanced Wastewater Treatment (Southport AWT) Plant is a Class IV nitrification facility with screening, grit removal tanks, primary clarifiers, biological roughing towers, air nitrification reactors, secondary clarifiers, mixed media tertiary filters, effluent disinfection by chlorination/dechlorination and ultraviolet (UV), effluent flow monitoring, and effluent pumping.

The Southport AWT Plant has a design average flow of 125 MGD with a peak design flow of 250 MGD. Sludges are conveyed to and centrally processed by thickening, dewatering and incineration operations at the Belmont AWT Plant's Solids Handling Section. The Southport AWT Plant has two equalization basins with a total storage capacity of 25 million gallons. These basins are used to store screened raw wastewater. The basins are designed to be used

during wet weather when the plant's treatment capacity has been reached.

As part of the Indianapolis' CSO Long-Term Control Plan, as amended and approved by the United States Environmental Protection Agency (U.S. EPA), the permittee has constructed the Southport AWT Capacity Expansion Project in 2016. This project demolished the existing grit structure and constructed new grit and tunnel screening facilities. The new grit and tunnel screening facilities receives flow from the raw sewage pump station, surface flow wet weather pump station, and is connected to the Deep Rock Tunnel (DRT) Pump Station and will handle flows when the DRT pump station begins the tunnel dewatering process. In addition, new south primary clarifiers with increased capacity, a mixed-liquor channel to carry flow from the ANS system to the ONS system, and a new UV disinfection system were constructed. The existing ANS and ONS systems were modified, the existing biological roughing pump station was modified to be used as ONS wet weather pumps station (ONS WWPS), and the existing biological roughing towers were demolished.

The DRT pump station has a design peak flow of 90 MGD and is located within the Southport AWT plant flood protection levee. The DRT pump station dewateres the stored CSO flows in the Deep Rock Tunnel Connector and Eagle Creek Line AA extension (DRTC) and eventually the DigIndy deep tunnel system. The DRTC became fully operational in March 2018. DRT pump station will dewater the stored CSO flows in both dry and wet weather conditions. The tunnel dewatered flow enters the new grit and tunnel screening facilities and follows the plant treatment processes.

The mass limits for CBOD₅, TSS, and ammonia-nitrogen at Outfall 001 are based on the peak design flow of 250 MGD.

The Southport AWT Facility has the following flow diversions:

1. Raw Wastewater Diversion: Raw wastewater can be diverted to either of the two equalization basins after the screening process. Excess flow is pumped from the Surface Flow Wet Weather Pump Station (SFWWPS) to the equalization basins. The stored wastewater is returned to Southport's Headworks for full treatment after the influent flow rate decreases.
2. Grit Tank Diversion: A screened raw wastewater diversion exists prior to the grit facility. Flows can be diverted directly to the Mixed Liquor Channel from the SFWWPS bypassing the grit facility, primary clarifiers, and the ANS system.
3. Grit Tank Effluent Diversion: A preliminary treatment effluent diversion exists that allows flows to be diverted around the primary clarifiers and the ANS system to the ONS system. This diversion is located at Junction Structure (JS) 101B and sends screened and dewatered flows to the ONS WWPS or northwest primary clarifiers.

4. Primary Influent Diversion: A primary influent diversion exists at Junction Structure (JS) 102A. Flows can be diverted past the southeast primary clarifiers to the southwest primary clarifiers using the sluice gates at JS 102A.
5. Primary Effluent Diversion: A primary effluent diversion exists when using the northwest primary clarifiers. Flow from the two southern northwest primary clarifiers can be diverted to the mixed liquor channel at Junction Structure (JS) 105. Flow from the northern two primary clarifiers is conveyed to the ONS WWPS.
6. ONS Effluent Diversion to Disinfection System: An oxygen nitrification effluent diversion exists prior to the facility's tertiary filters. A portion of the oxygen nitrification system effluent after the secondary final clarifiers can be diverted through Junction Structure (JS) 111 around the tertiary filters. The flow is then conveyed by gravity to the Chlorine Contact Tank for disinfection. .
7. Effluent Filters Diversion: An air and oxygen nitrification system effluent diversion exists prior to the facility's tertiary filters. All or a portion of the air and oxygen nitrification system effluent (up to 150 MGD) can be diverted through a 42" butterfly valve at Junction Structure (JS) 112 in the Effluent Filter Building to the effluent disinfection system.
8. UV System Flow Diversion: A diversion exists prior to the UV system. All or a portion of the filter flow effluent can be diverted around the UV system at Junction Structure (JS) 113A. This diversion will require chlorination to occur at Junction Structure (JS) 110 which is located at the southwestern end of the secondary final clarifiers.

Storm Water Associated with Industrial Activity

Storm water associated with industrial activity at a WWTP is handled by a general permit by rule (327 IAC 15-6-7). The permittee must ensure that storm water discharges from the Southport AWT Plant and the Belmont AWT Plant are covered by the general permit by rule. This Office's Storm Water Section staff handles the permitting for such activities.

Collection System

The collection system is comprised of combined sanitary and storm sewers with 130 Combined Sewer Overflow (CSO) locations and one (1) Wet Weather Treatment Facility (WWTF). Requirements for and location of the CSO points are included in the Attachment A to the NPDES permit. According to the NPDES permit application approximately 35% of the

collection system is combined sanitary and storm sewers. The CSO locations and WWTF outfall have been identified and permitted with provisions in Attachment A of the permit.

Within Attachment A of the renewal permit, information for the CSO outfalls and WWTF have been changed from the previous permit renewal. The physical location of some CSO outfalls have not changed while the physical location of others have changed from the weir structure to the actual outfall where it meets the receiving stream. Location coordinates have been changed in the renewal to provide a more accurate depiction of the outfall location. The new location coordinates were obtained from updated aerial photography on a GIS map.

CSO Statutory or Regulatory Basis for Permit Provisions

CSOs are point sources subject to NPDES permit requirements, including both technology-based and water quality-based requirements of the CWA and state law. Thus the permit contains provisions IDEM deems necessary to meet water quality standards, as well as technology-based treatment requirements, operation and maintenance requirements, and best management practices. This permit is based on various provisions of state and federal law, including (1) Title 13 of the Indiana Code; (2) the water quality standards set forth in 327 IAC 2-1.5; (3) the NPDES rules set forth in 327 IAC 2 and 327 IAC 5, including 327 IAC 5-2-8 and 327 IAC 5-2-10; and (4) section 402(q) of the CWA (33 USC § 1342), which requires all permits or orders issued for discharges from municipal CSOs to conform with the provisions of EPA's National CSO Control Policy (58 Fed. Reg. 18688, April 19, 1994). EPA's CSO Policy contains provisions that, among other things, require permittees to develop and implement minimum technological and operational controls and long term control plans to meet state water quality standards. The permit's penalty provisions are based in large part on IC 13-30. In addition to the regulatory provisions previously cited, the data collection and reporting requirements are based in part on 327 IAC 5-1-3, 327 IAC 5-2-13 and section 402(q) of the CWA. The long term control plan provisions were included to ensure compliance with water quality standards.

Explanation of Effluent Limitations and Conditions

The effluent limitations set forth in Part II of Attachment A are derived in part from the narrative water quality standards set forth in 327 IAC 2-1-6. The narrative standards are minimum standards that apply to all waters at all times, and therefore are applicable to all discharges of pollutants. Because EPA has not issued national effluent limitation guidelines for this category

of discharges, the technology-based BAT/BCT provisions are based on best professional judgment (BPJ) in addition to section 402(q) of the CWA. (CSO discharges are not subject to the secondary treatment requirements applicable to publicly owned treatment works because overflow points have been determined to not be part of the treatment plant. *Montgomery Environmental Coalition v. Costle*, 646 F.2d 568 (D.C. Cir. 1980).)

CSO Long Term Control Plan Requirements

CWA Authority, Inc. is currently implementing the approved Indianapolis CSO Long Term Control Plan (LTCP). The LTCP includes the use of storage/conveyance facilities in all major watersheds combined with advanced wastewater treatment plant improvements. Facilities will be designed to achieve 97 percent capture on Fall Creek and 95 percent capture on White River, Pleasant Run/Bean Creek, Pogues Run, and Eagle Creek. Sewer separation will be employed along Lick Creek, State Ditch and other isolated outfall locations. Flows will be collected from outfalls on a regional basis using conveyance facilities connected to a single deep tunnel. The deep tunnel will serve primarily as a storage facility, and the stored flows will be pumped to the Southport Advanced Wastewater Treatment (AWT) plant at the end of a storm event. The AWT facilities have been expanded and upgraded to provide treatment of wet weather flows. The plan also includes the use of near-surface collection conduits and satellite near-surface storage facilities to control remotely located outfalls on upper White River and Pogues Run.

The key features of the plan are:

- The Deep Rock Tunnel Connector system along eight miles of the White River connecting to the central tunnel system (White River and Fall Creek tunnels) with a pumping facility located at the Southport AWT Plant.
- A collection interceptor for remote outfalls along Fall Creek and the White River to convey wet-weather flows into the central tunnel system.
- Satellite storage facilities for remotely located outfalls along upper White River and upper Pogues Run.
- Collection interceptors along Pogues Run, Pleasant Run and Bean Creek to convey wet-weather flows into the central tunnel system.
- A collection interceptor and tunnel along Eagle Creek to convey wet weather flows into the central tunnel system.
- Local sewer separation projects to eliminate isolated overflows on State Ditch, Lick Creek, White River and the upstream ends of Fall Creek, Pogues Run and Bean Creek.
- Belmont and Southport AWT plant improvements.
- Watershed improvements.

Currently, one CSO Wet Weather Treatment Facility exists in the collection system. The CSO Wet Weather Treatment Facility, located at Westfield Blvd and 56th Street, also known as Lift Station 507, is designed to provide 95% capture at a flow rate of 35 MGD with approximately 34 minutes of detention time. Screening/skimming, disinfection and dechlorination is provided. Flow rates up to 53 MGD have approximately 23 minutes of detention time. Flow rates greater than 53 MGD will receive screening and partial disinfection. Flow rates greater than 160 MGD will bypass the station entirely and be discharged into the White River via outfall 155. In addition, if the level at structure B3 reaches 707.5 feet or greater, the flow will automatically bypass the station; if the river level gets to 706 feet, the station will also automatically be bypassed. Refer to the Attachment A to the permit for additional requirements on this discharge.

The LTCP has an implementation schedule of approximately 18 years and is expected to achieve a level of control of 97 percent capture of combined sewage flows on Fall Creek and 95 percent capture of combined sewage flows on other waterways. The plan is expected to result in reducing the average annual CSO frequency from 60 storms per year to approximately two storms per year on Fall Creek and four storms per year on other waterways based on average rainfall statistics for Indianapolis. Full LTCP implementation is anticipated to be completed in 2025. The implementation schedule is enforced through Federal Consent Decree No. 1:06-cv-01456-SEB-TAB.

Spill Reporting Requirements

Reporting requirements associated with the Spill Reporting, Containment, and Response requirements of 327 IAC 2-6.1 are included in Part II.B.2.c. and Part II.C.3. of the NPDES permit. Spills from the permitted facility meeting the definition of a spill under 327 IAC 2-6.1-4(15), the applicability requirements of 327 IAC 2-6.1-1, and the Reportable Spills requirements of 327 IAC 2-6.1-5 (other than those meeting an exclusion under 327 IAC 2-6.1-3 or the criteria outlined below) are subject to the Reporting Responsibilities of 327 IAC 2-6.1-7.

It should be noted that the reporting requirements of 327 IAC 2-6.1 do not apply to those discharges or exceedences that are under the jurisdiction of an applicable permit when the substance in question is covered by the permit and death or acute injury or illness to animals or humans does not occur. In order for a discharge or exceedence to be under the jurisdiction of this NPDES permit, the substance in question (a) must have been discharged in the normal course of operation from an outfall listed in this permit, and (b) must have been discharged from an outfall for which the permittee has authorization to discharge that substance.

Solids Disposal

The permittee is required to dispose of its sludge in accordance with 329 IAC 10, 327 IAC 6.1, or 40 CFR Part 503. Solids are treated and are incinerated or landfilled.

Receiving Stream

The facilities discharge the West Fork White River to via Outfalls 001 and 006. The receiving water has a seven day, ten year low flow ($Q_{7,10}$) of 73 cubic feet per second (47 MGD) at the outfall location.

The receiving stream is designated for full body contact recreational use and shall be capable of supporting a well-balanced warm water aquatic community in accordance with 327 IAC 2-1. The West Fork White River at the Belmont AWT Plant outfall location is listed on the 2016 303d list

as being impaired due to excessive PCBs in fish tissue. The West Fork White River at the Southport AWT Plant outfall location is listed on the 2016 303d list as being impaired due to excessive mercury and PCBs in fish tissue and for cyanide. A Total Daily Maximum Load (TMDL) study has been written for the West Fork of White River for *E. coli* impairment. All TMDL documents are available for view at: <http://in.gov/idem/nps/2652.htm>

Below please find the impairment status and designated uses of the CSO receiving waterways:

The receiving streams are designated for full body contact recreational use and shall be capable of supporting a well-balanced warm water aquatic community in accordance with 327 IAC 2-1.

- Little Buck Creek – not considered impaired or has not been assessed
- Big Eagle Creek – impaired for *E. coli* and PCBs in fish tissue based upon a review of the 2016 303d list
- Meadow Brook – not impaired or has not been assessed
- Bean Creek – impaired for *E. coli* and impaired biotic communities based upon a review of the 2016 303d list
- State Ditch - impaired for *E. coli* and impaired biotic communities based upon a review of the 2016 303d list
- Pleasant Run – TMDL for *E. coli* completed in March 2004
- Little Eagle Creek - impaired for *E. coli* and impaired biotic communities based upon a review of the 2016 303d list
- Pogues Run - impaired for *E. coli* and impaired biotic communities based upon a review of the 2016 303d list
- Fall Creek - TMDL for *E. coli* completed in March 2004
- Lick Creek - not considered impaired or has not been assessed

Industrial Contributions

The permittee accepts industrial flow from approximately 54 industries. Based on the industrial flow received by the treatment facility, the permittee is required to operate its approved industrial pretreatment program approved on March 3, 1994 and December 29, 2010, and any subsequent modifications approved up to the issuance of this permit. The permittee was approved by EPA for direct delegation of the Pretreatment program on March 29, 2016. Provisions for the industrial pretreatment program are included in Part III of this permit renewal. In addition, monitoring requirements and/or effluent limitations for copper, zinc, fluoride, cyanide, sulfate, arsenic, cadmium, chromium, lead, nickel, chloride, and Whole Effluent Toxicity (WET) are being included in the permit renewal.

Priority Pollutant Monitoring

The permittee shall conduct an annual inventory of organic pollutants (see 40 CFR 423, Appendix A) and shall identify and quantify additional organic compounds which occur in the influent, effluent, and sludge. The analytical report shall be sent to the Pretreatment Group. This report is due in December of each year.

Antidegradation

327 IAC 2-1.3 outlines the state's Antidegradation Standards and Implementation Procedures. The Tier 1 antidegradation standard found in 327 IAC 2-1.3-3(a) applies to all surface waters of the state regardless of their existing water quality. Based on this standard, for all surface waters of the state, existing uses and the level of water quality necessary to protect existing uses shall be maintained and protected. IDEM implements the Tier 1 antidegradation standard by requiring NPDES permits to contain effluent limits and best management practices for regulated pollutants that ensure the narrative and numeric water quality criteria applicable to the designated use are achieved in the water and any designated use of the downstream water is maintained and protected.

The Tier 2 antidegradation standard found in 327 IAC 2-1.3-3(b) applies to surface waters of the state where the existing quality for a parameter is better than the water quality criterion for that parameter established in 327 IAC 2-1-6. These surface waters are considered high quality for the parameter and this high quality shall be maintained and protected unless the commissioner finds that allowing a significant lowering of water quality is necessary and accommodates important social or economic development in the area in which the waters are located. IDEM implements the Tier 2 antidegradation standard for regulated pollutants with numeric water quality criteria quality adopted in or developed pursuant to 327 IAC 2-1 and utilizes the antidegradation implementation procedures in 327 IAC 2-1.3-5 and 2-1.3-6.

According to 327 IAC 2-1.3-1(b), the antidegradation implementation procedures in 327 IAC 2-1.3-5 and 2-1.3-6 apply to a proposed new or increased loading of a regulated pollutant to surface waters of the state from a deliberate activity subject to the Clean Water Act, including a change in process or operation that will result in a significant lowering of water quality.

This permit includes new permit limitations for phosphorus. In accordance with 327 IAC 2-1.3-1(b), the new permit limitations are not subject to the Antidegradation Implementation Procedures in 327 IAC 2-1.3-5 and 2-1.3-6 as the new permit limitations are not the result of a deliberate activity taken by the permittee.

Effluent Limitations and Rationale

The effluent limitations proposed herein are based on Indiana Water Quality Standards, NPDES regulations, and Wasteload Allocation (WLA) analyses performed by this Office's Permits

Branch staff on October 28, 1996, November 26, 2012, and January 8, 2018 (along with an addendum to the January 8, 2018 analysis, dated February 1, 2018). These limits are in accordance with antibacksliding regulations specified in 327 IAC 5-2-10(a)(11).

The final effluent limitations to be limited and/or monitored include: Flow, Carbonaceous Biochemical Oxygen Demand (CBOD₅), Total Suspended Solids (TSS), Ammonia-nitrogen (NH₃-N), phosphorus, pH, Dissolved Oxygen (DO), Total Residual Chlorine (TRC), *Escherichia coli* (*E. coli*), copper, zinc, fluoride, cyanide, sulfate, arsenic, cadmium, chromium, lead, nickel, chloride, and Whole Effluent Toxicity.

IDEM has waived the 85% removal requirement for CBOD₅ and TSS under the provisions of 40 CFR 133.103(a). The periodic improvements required under the permittee's LTCP would make the percent removal level a dynamic measurement and any limitation based on percent removal impractical.

Monitoring frequencies are based upon facility size and type.

Final Effluent Limitations for Southport AWT Plant – Outfall 001

The summer monitoring period runs from May 1 through November 30 of each year and the winter monitoring period runs from December 1 through April 30 of each year. The disinfection season runs from April 1 through October 31 of each year.

The mass limits for CBOD₅, TSS and ammonia-nitrogen have been calculated utilizing the peak design flow of 250 MGD. This is to facilitate the maximization of flow through the treatment facility in accordance with this Office's CSO policy.

Flow

Flow is to be measured daily as a 24-hour total. Reporting of flow is required by 327 IAC 5-2-13.

CBOD₅

CBOD₅ is limited to 10 mg/l (20,863 lbs/day) as a monthly average and 15 mg/l (31,294 lbs/day) as a weekly average during the summer monitoring period. CBOD₅ is limited to 25 mg/l (52,156 lbs/day) as a monthly average and 40 mg/l (83,450 lbs/day) as a weekly average during the winter monitoring period. Monitoring is to be conducted daily by 24-hour composite sampling.

The CBOD₅ concentration limitations included in this permit are the same concentration limitations found in the facility's previous permit and reflect the WLA performed by this Office's Permits Technical Support Section staff on October 28, 1996.

TSS

TSS is limited to 10 mg/l (20,863 lbs/day) as a monthly average and 15 mg/l (31,294 lbs/day) as a weekly average during the summer monitoring period. TSS is limited to 30 mg/l (62,588 lbs/day) as a monthly average and 40 mg/l (83,450 lbs/day) as a weekly average during the winter monitoring period. Monitoring is to be conducted daily by 24-hour composite sampling.

The TSS concentration limitations included in this permit are the same limitations found in the facility's previous permit and reflect the WLA performed by this Office's Permits Technical Support Section staff on October 28, 1996.

Ammonia-nitrogen

Ammonia-nitrogen is limited to 1.4 mg/l (2,921 lbs/day) as a monthly average and 2.1 mg/l (4,381 lbs/day) as a weekly average during the summer monitoring period. During the winter monitoring period, ammonia-nitrogen is limited to 2.5 mg/l (5,216 lbs/day) as a monthly average and 3.8 mg/l (7,928 lbs/day) as a weekly average.

Monitoring is to be conducted daily by 24-hour composite sampling. The ammonia-nitrogen concentration limitations included in this permit are set in accordance with the Wasteload Allocation (WLA) analysis performed by this Office's Permits Branch staff on November 26, 2012.

Phosphorus

Consistent with IDEM's current Nonrule policy (WATER-019-NPD) which applies phosphorus reduction requirements to POTWs with average design flows greater than or equal to 1 MGD, monitoring requirements and an effluent limitation for phosphorus have been included in the permit renewal. Phosphorus is limited to 1.0 mg/l as a monthly average. Since the limit is a new requirement of the permit, and as the permittee provided sufficient justification in a letter to this Office dated January 24, 2018, this Office has included a 36 month schedule of compliance (See Part I.D of the permit) in order to allow the permittee time to evaluate phosphorus levels and treatment. During the interim monitoring period, phosphorus monitoring is to be conducted daily by 24-hour composite sampling. During the final monitoring period, phosphorus monitoring is to be conducted daily by 24-Hr. composite sampling.

pH

The pH limitations have been based on 40 CFR 133.102 which is cross-referenced in 327 IAC 5-5-3.

To ensure conditions necessary for the maintenance of a well-balanced aquatic community, the pH of the final effluent must be between 6.0 and 9.0 standard units in accordance with provisions

in 327 IAC 2-1-6(b)(2). pH must be measured daily by grab sampling. These pH limitations are the same as the limitations found in the facility's previous permit.

Dissolved Oxygen

Dissolved oxygen shall not fall below 7.0 mg/l as a daily minimum average during the summer monitoring period. Dissolved oxygen shall not fall below 6.0 mg/l as a daily minimum average during the winter monitoring period.

Dissolved oxygen measurements must be based on the average of twelve (12) grab samples taken within a 24-hr. period and is to be monitored daily. The previous daily minimum average limitation in the summer monitoring period was 8.0 mg/l.

The permittee conducted an evaluation of the original dissolved oxygen Wasteload Allocation Analysis (WLA) conducted by the Indiana State Board of Health in 1975. The permittee created and ran a water quality model to update the 1975 WLA. Both the 1975 WLA and the updated model allow for a lower dissolved oxygen limit in the summer monitoring period of 7.0 mg/l. This is due to the fact that the stringent ammonia-nitrogen limitations included in the NPDES permit significantly reduces nitrogen oxygen demand. This lower demand enables a slightly lower dissolved oxygen limitation that meets state water quality standards for dissolved oxygen. Please refer to the 1975 WLA and the NPDES permit application that includes the updated tools the permittee used to evaluate the dissolved oxygen profile. The slightly less stringent limitation in the summer monitoring period does not constitute backsliding per 327 IAC 5-2-10(a)(11)(A), as the slightly less stringent dissolved oxygen limitation in the summer is in compliance with 303(d)(4)(B) of the Clean Water Act. These documents are included in the NPDES permit application submitted on November 17, 2017.

Total Residual Chlorine

Disinfection of the effluent is required from April 1 through October 31, annually.

Effluent dechlorination will be required in order to protect aquatic life. In accordance with Indiana Water Quality Standards, the final effluent limits (end-of-pipe) for TRC are 0.01 mg/l monthly average and 0.02 mg/l daily maximum. Compliance will be demonstrated if the observed effluent concentrations are less than the limit of quantitation (0.06 mg/l). Disinfection requirements are established in 327 IAC 5-10-6. This monitoring is to be conducted daily by grab sampling.

E. coli

The *E. coli* limitations and monitoring requirements apply from April 1 through October 31, annually. *E. coli* is limited to 125 count/100 ml as a monthly average, and 235 count/100 ml as a daily maximum. The monthly average *E. coli* value shall be calculated as a geometric mean. This monitoring is to be conducted daily by grab sampling. These *E. coli* limitations are set in accordance with regulations specified in 327 IAC 5-10-6.

Metals/Non-conventional Pollutants

Reasonable Potential Evaluations (RPE) were performed in conjunction with the Wasteload Allocation Analysis performed by this Office's Permits Branch staff on January 8, 2018. In reviewing the RPE, the projected effluent quality (PEQ) for arsenic, cadmium, chromium, lead, nickel, chloride, cyanide, fluoride, zinc, and sulfate is less than the projected effluent limitations (PELs). Therefore, effluent limitations have been removed and/or not included in the permit renewal. However, due to the industrial contributors to the collection system, monitoring requirements for these metals are being retained, at a reduced frequency. Arsenic, cadmium, chromium, lead, nickel, chloride, cyanide, fluoride, zinc and sulfate are to be monitored two (2) times monthly.

The RPE performed by this Office's Permits Branch staff on January 8, 2018, revealed that the projected effluent quality (PEQ) for copper was greater than the projected effluent limitations (PELs). Therefore, effluent limitations for copper are being included in this permit. Copper is limited to 0.03 mg/l as a monthly average and 0.06 mg/l as a daily maximum. This monitoring is to be conducted weekly by 24-Hr. composite sampling. The copper limitations are the same as the limitations contained in the previous permit.

In addition to effluent monitoring and limitations, the permittee is required to monitor the influent wastestream as specified in Table 5 of the permit.

Whole Effluent Toxicity Testing

The permittee submitted Whole Effluent Toxicity Tests (WETT) with the renewal application as required in 327 IAC 5-2-3(g). The submitted WETT did not reveal any toxicity to the tested species.

The permittee shall conduct the whole effluent toxicity tests described in Part I.E. of the permit to monitor the toxicity of the discharge from Outfall 001. This toxicity testing is to be performed biannually for the duration of this NPDES permit. Acute toxicity will be demonstrated if the effluent is observed to have exceeded **1.0** TU_a (acute toxic units) based on 100% effluent for the test organism in 48 and 96 hours for *Ceriodaphnia dubia* or *Pimephales promelas*, whichever is more sensitive. Chronic toxicity will be demonstrated if the effluent is observed to have exceeded **1.1** TU_c (chronic toxic units) for *Ceriodaphnia dubia* or *Pimephales promelas*. If

acute or chronic toxicity is found in any of the tests specified above, another toxicity test using the specified methodology and same test species shall be conducted within two weeks. If any two tests indicate the presence of toxicity, the permittee must begin the implementation of a toxicity reduction evaluation (TRE) as is described in Part I.E.2. of the permit.

Final Effluent Limitations for Belmont AWT Plant – Outfall 006

The summer monitoring period runs from May 1 through November 30 of each year and the winter monitoring period runs from December 1 through April 30 of each year. The disinfection season runs from April 1 through October 31 of each year. Monitoring frequencies are based upon facility size and type.

The mass limits for CBOD₅, TSS and ammonia-nitrogen have been calculated utilizing the peak design flow of 300 MGD. This is to facilitate the maximization of flow through the treatment facility in accordance with this Office's CSO policy.

Flow

Flow is to be measured daily as a 24-hour total. Reporting of flow is required by 327 IAC 5-2-13.

CBOD₅

CBOD₅ is limited to 10 mg/l (25,035 lbs/day) as a monthly average and 15 mg/l (37,553 lbs/day) as a weekly average during the summer monitoring period. CBOD₅ is limited to 20 mg/l (50,070 lbs/day) as a monthly average and 30 mg/l (75,105 lbs/day) as a weekly average during the winter monitoring period. Monitoring is to be conducted daily by 24-hour composite sampling.

The CBOD₅ concentration limitations included in this permit are the same concentration limitations found in the facility's previous permit and reflect the WLA performed by this Office's Permits Technical Support Section staff on October 28, 1996.

TSS

TSS is limited to 10 mg/l (25,035 lbs/day) as a monthly average and 15 mg/l (37,553 lbs/day) as a weekly average during the summer monitoring period. TSS is limited to 20 mg/l (50,070 lbs/day) as a monthly average and 30 mg/l (75,105 lbs/day) as a weekly average during the winter monitoring period. Monitoring is to be conducted daily by 24-hour composite sampling.

The TSS concentration limitations included in this permit are the same limitations found in the facility's previous permit and reflect the WLA performed by this Office's Permits Technical Support Section staff on October 28, 1996.

Ammonia-nitrogen

Ammonia-nitrogen is limited to 1.4 mg/l (3,505 lbs/day) as a monthly average and 2.1 mg/l (5,257 lbs/day) as a weekly average during the summer monitoring period. During the winter monitoring period, ammonia-nitrogen is limited to 2.5 mg/l (6,259 lbs/day) as a monthly average and 3.8 mg/l (9,513 lbs/day) as a weekly average.

Monitoring is to be conducted daily by 24-hour composite sampling. The ammonia-nitrogen concentration limitations included in this permit are set in accordance with the Wasteload Allocation (WLA) analysis performed by this Office's Permits Branch staff on November 26, 2012.

Phosphorus

Consistent with IDEM's current Nonrule policy (WATER-019-NPD) which applies phosphorus reduction requirements to POTWs with average design flows greater than or equal to 1 MGD, monitoring requirements and an effluent limitation for phosphorus have been included in the permit renewal. Phosphorus is limited to 1.0 mg/l as a monthly average. Since the limit is a new requirement of the permit, and as the permittee provided sufficient justification in a letter to this Office dated January 24, 2018, this Office has included a 36 month schedule of compliance (See Part I.D of the permit) in order to allow the permittee time to evaluate phosphorus levels and treatment. During the interim monitoring period, phosphorus monitoring is to be conducted daily by 24-hour composite sampling. During the final monitoring period, phosphorus monitoring is to be conducted daily.

pH

The pH limitations have been based on 40 CFR 133.102 which is cross-referenced in 327 IAC 5-5-3.

To ensure conditions necessary for the maintenance of a well-balanced aquatic community, the pH of the final effluent must be between 6.0 and 9.0 standard units in accordance with provisions in 327 IAC 2-1-6(b)(2). pH must be measured daily by grab sampling. These pH limitations are the same as the limitations found in the facility's previous permit.

Dissolved Oxygen

Dissolved oxygen shall not fall below 7.0 mg/l as a daily minimum average during the summer monitoring period. Dissolved oxygen shall not fall below 6.0 mg/l as a daily minimum average during the winter monitoring period.

Dissolved oxygen measurements must be based on the average of twelve (12) grab samples taken within a 24-hr. period and is to be monitored daily. The previous daily minimum average limitation in the summer monitoring period was 8.0 mg/l.

The permittee conducted an evaluation of the original dissolved oxygen Wasteload Allocation Analysis (WLA) conducted by the Indiana State Board of Health in 1975. The permittee created and ran a water quality model to update the 1975 WLA. Both the 1975 WLA and the updated model allow for a lower dissolved oxygen limit in the summer monitoring period of 7.0 mg/l. This is due to the fact that the stringent ammonia-nitrogen limitations included in the NPDES permit significantly reduces nitrogen oxygen demand. This lower demand enables a slightly lower dissolved oxygen limitation that meets state water quality standards for dissolved oxygen. Please refer to the 1975 WLA and the NPDES permit application that includes the updated tools the permittee used to evaluate the dissolved oxygen profile. The slightly less stringent limitation in the summer monitoring period does not constitute backsliding, per 327 IAC 5-2-10(A)(11)(A), as the slightly less stringent dissolved oxygen limitation in the summer is in compliance with 303(d)(4)(B) of the Clean Water Act. These documents are included in the NPDES permit application submitted on November 17, 2017.

Total Residual Chlorine

Disinfection of the effluent is required from April 1 through October 31, annually.

Effluent dechlorination will be required in order to protect aquatic life. In accordance with Indiana Water Quality Standards, the final effluent limits (end-of-pipe) for TRC are 0.01 mg/l monthly average and 0.02 mg/l daily maximum. Compliance will be demonstrated if the

observed effluent concentrations are less than the limit of quantitation (0.06 mg/l). Disinfection requirements are established in 327 IAC 5-10-6. This monitoring is to be conducted daily by grab sampling.

E. coli

The *E. coli* limitations and monitoring requirements apply from April 1 through October 31, annually. *E. coli* is limited to 125 count/100 ml as a monthly average, and 235 count/100 ml as a daily maximum. The monthly average *E. coli* value shall be calculated as a geometric mean. This monitoring is to be conducted daily by grab sampling. These *E. coli* limitations are set in accordance with regulations specified in 327 IAC 5-10-6.

Metals/Non-conventional Pollutants

Reasonable Potential Evaluations (RPE) were performed in conjunction with the Wasteload Allocation Analysis performed by this Office's Permits Branch staff on January 8, 2018 (along

with the addendum to the analysis dated February 1, 2018). In reviewing the RPE, the projected effluent quality (PEQ) for arsenic, cadmium, cyanide, chloride, chromium, lead, nickel, fluoride, zinc, and sulfate is less than the projected effluent limitations (PELs). Therefore, effluent limitations have been removed and/or not included in the permit renewal. However, due to the industrial contributors to the collection system, monitoring requirements for these metals and toxics are being retained, at a reduced frequency. Arsenic, cadmium, chromium, chloride, cyanide, lead, nickel, fluoride, zinc and sulfate are to be monitored two (2) times monthly.

The RPE performed by this Office's Permits Branch staff on November 26, 2012, revealed that the projected effluent quality (PEQ) for copper was greater than the projected effluent limitations (PELs). Therefore, effluent limitations for copper are being included in this permit. Copper is limited to 0.03 mg/l as a monthly average and 0.06 mg/l as a daily maximum. This monitoring is to be conducted weekly by 24-Hr. composite sampling. The copper limitations are the same as the limitations contained in the previous permit.

In addition to effluent monitoring and limitations, the permittee is required to monitor the influent wastestream as specified in Table 6 of the permit.

Whole Effluent Toxicity Testing

The permittee submitted Whole Effluent Toxicity Tests (WETT) with the renewal application as required in 327 IAC 5-2-3(g). The submitted WETT did not reveal any toxicity to the tested species.

The permittee shall conduct the whole effluent toxicity tests described in Part I.E. of the permit to monitor the toxicity of the discharge from Outfall 006. This toxicity testing is to be performed biannually for the duration of this NPDES permit. Acute toxicity will be demonstrated if the effluent is observed to have exceeded 1.0 TU_a (acute toxic units) based on 100% effluent for the test organism in 48 and 96 hours for *Ceriodaphnia dubia* or *Pimephales promelas*, whichever is more sensitive. Chronic toxicity will be demonstrated if the effluent is observed to have exceeded 1.1 TU_c (chronic toxic units) for *Ceriodaphnia dubia* or *Pimephales promelas*. If acute or chronic toxicity is found in any of the tests specified above, another toxicity test using the specified methodology and same test species shall be conducted within two weeks. If any two tests indicate the presence of toxicity, the permittee must begin the implementation of a toxicity reduction evaluation (TRE) as is described in Part I.E.2. of the permit.

Backsliding

None of the concentration limits included in this permit conflict with antibacksliding regulations found in 327 IAC 5-2-10(11)(A), therefore, backsliding is not an issue.

Reopening Clauses

Seven reopening clauses were incorporated into the permit in Part I.C. One clause is to incorporate effluent limits from any further wasteload allocations performed; a second clause is to allow for changes in the sludge disposal standards; a third clause is to incorporate any applicable effluent limitation or standard issued or approved under section 301(b)(2)(C), (D) and (E), 304(b)(2), and 307(a)(2) of the Clean Water Act; a fourth clause is to incorporate monitoring requirements and effluent limitations for arsenic, cadmium, chromium, copper, chloride, cyanide, lead, fluoride, nickel, sulfate, and/or zinc; a fifth clause is to include whole effluent toxicity limitations or to include limitations for specific toxicants; a sixth clause is to include a case-specific Method Detection Level (MDL); and a seventh clause is to incorporate additional requirements or limitations for specific toxicants if the required additional analyses in Part I.A. indicate that such additional requirements and/or limitations are necessary.

Compliance Status

The permittee is subject to Consent Decree 1:06-cv-1456-DFH-VSS for the control of CSO.

Expiration Date

A five-year NPDES permit is proposed.

Drafted by: Jason House
April 2018

Updated by: Jason House
May 2018

POST PUBLIC NOTICE ADDENDUM: May 2018

The draft NPDES permit renewal for the Belmont and Southport Advanced Wastewater Treatment Plants was made available for public comment from April 13, 2018 through May 14, 2018 as part of Public Notice No. 2018-4E-RD. During this comment period several format issues and typographical errors were indicated by the permittee. The format and typographical errors have been addressed in the permit issuance. Additionally, the following changes were made to the permit:

Page 16, A. 4. c. This section now reads as follows:

“c. Priority Pollutant Monitoring

The permittee shall conduct an annual inventory of priority pollutants (see 40 CFR 423, Appendix A) and shall identify and quantify additional organic compounds

which occur in the influent, effluent, and sludge from both the Belmont and Southport AWT Plants, which is processed at the Belmont AWT Plant. The analytical report shall be sent to the Pretreatment Group. This report is due in December of each year. The inventory shall consist of:"

Page 36, B. 2. Southport Primary Influent Bypass now reads as follows:

“Southport Primary Influent Bypass: A preliminary treatment effluent diversion exists that allows flow to be diverted around the primary clarifiers. This diversion is located at the effluent channel of the grit chambers and diverts screened and dewatered wastewater to Structure 5-K or flow is mixed with primary effluent and bypassed to Little Buck Creek through Outfall 002.”

Page 47, A. 6. This section now reads as follows:

“6. Public Participation and Annual Publishing of SIUs in Significant Noncompliance

The CA is required to comply with the public participation requirements under 40 CFR 25 and 327 IAC 5-19-3(2)(L). The CA must publish annually, by April 30, in the largest daily newspaper in the area, a list of SIUs that have been in Significant Noncompliance (SNC) with the SUO during the calendar year. The CA shall include in the ANNUAL REPORT a list of the SIUs published along with the proof of publication.”

Page 47, A. 5. This section now reads as follows:

“5. SIU Quarterly Noncompliance Report

The CA is required to report the compliance status of each SIU quarterly. The report is due by the 28th of the following months: May, August, November, and February of each year. The report shall include a description of corrective actions that have or will be taken by the CA and SIU to resolve the noncompliance situations. This report is to be sent to the Compliance Branch of the Office of Water Quality.”

Page 48, A.13. This section now reads as follows:

“7. POTW Pretreatment Program Revision Requirements

The permittee shall re-evaluate its SUO to determine whether it provides adequate legal authority to fully implement the pretreatment program. Any modifications to the permittee’s SUO shall be consistent with U.S. EPA’s EPA Model Pretreatment

Ordinance, available

at: http://cfpub.epa.gov/npdes/docs.cfm?program_id=3&view=allprog&sort=name#model_ordinance. If any changes are deemed necessary, the permittee shall notify U.S. EPA Region 5 and IDEM Pretreatment group.

In addition, the re-evaluation must include a technical re-evaluation of the local limits in accordance with 40 CFR 122.44(j)(2)(ii). The CA is to conduct the local limitations technical evaluation consistent with U.S. EPA's Local Limits Development Guidance (July 2004) document and U.S. EPA Region 5 Local Limits Spreadsheet (February 2011) available at: <http://www.epa.gov/r5water/npdestek/npdppta.htm>. The permittee submitted the local limit re-evaluation to U.S. EPA Region 5 and IDEM Pretreatment Group for review in May 2018.”

No substantial changes were made to the permit. Therefore, no additional public notice is required.

Drafted by: Jason House
May 2018

Cause No. 45582
STATE OF INDIANA
Attachment JAW-1
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Page 117 of 164
PUBLIC NOTICE NO: 2018 – 5G – F
DATE OF NOTICE: MAY 24, 2018

The Office of Water Quality issues the following NPDES FINAL PERMIT.

MAJOR – RENEWAL

BELMONT & SOUTHPORT ADVANCED WWTP (CWA AUTHORITY), Permit No. IN0023183, MARION COUNTY, Indianapolis, IN. This major municipal facility discharges 120-125 million gallons daily of sanitary, industrial and combined sewer wastewater into the West Fork White River. Permit Manager: Jason House, jahouse@idem.in.gov, 317/233-0470.

Notice of Right to Administrative Review [Permits]

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
100 North Senate Avenue - Room N103
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue - Room 1301
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;
 - 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 persons 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.

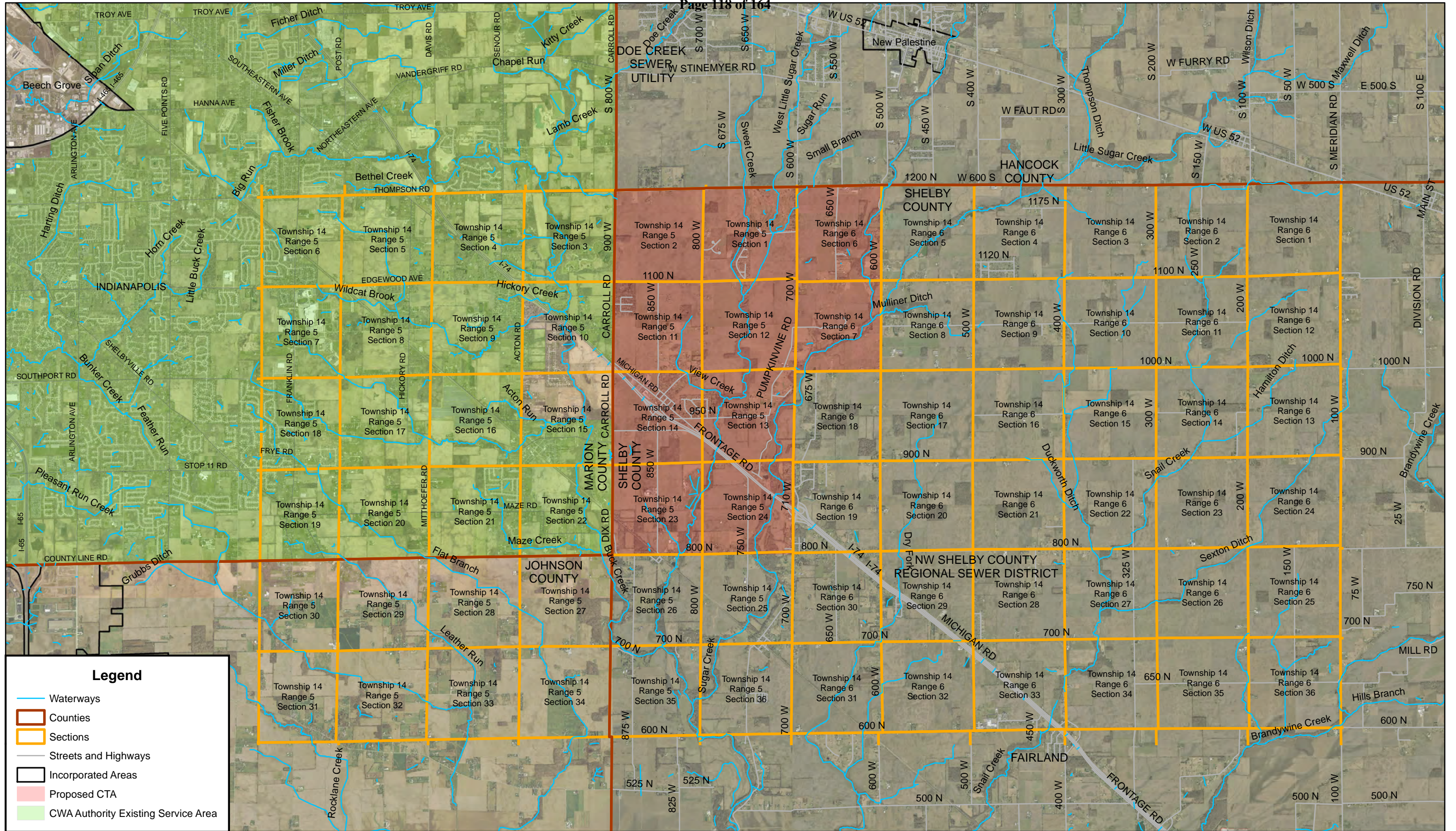
Failure to meet the requirements of the law with respect to a Petition for Administrative Review may result in a waiver of your right to seek administrative review of the Permit. Examples are:

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.

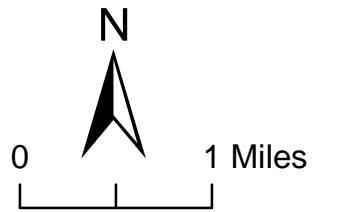
If you seek to have a Permit stayed during the Administrative Review, you may need to file a Petition for a Stay of Effectiveness. The specific requirements for such a Petition can be found in 315 IAC 1-3-2 and 315 IAC 1-3-2.1.

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.

"More information on the appeal review process is available on the website for the Office of Environmental Adjudication at <http://www.in.gov/oea>."

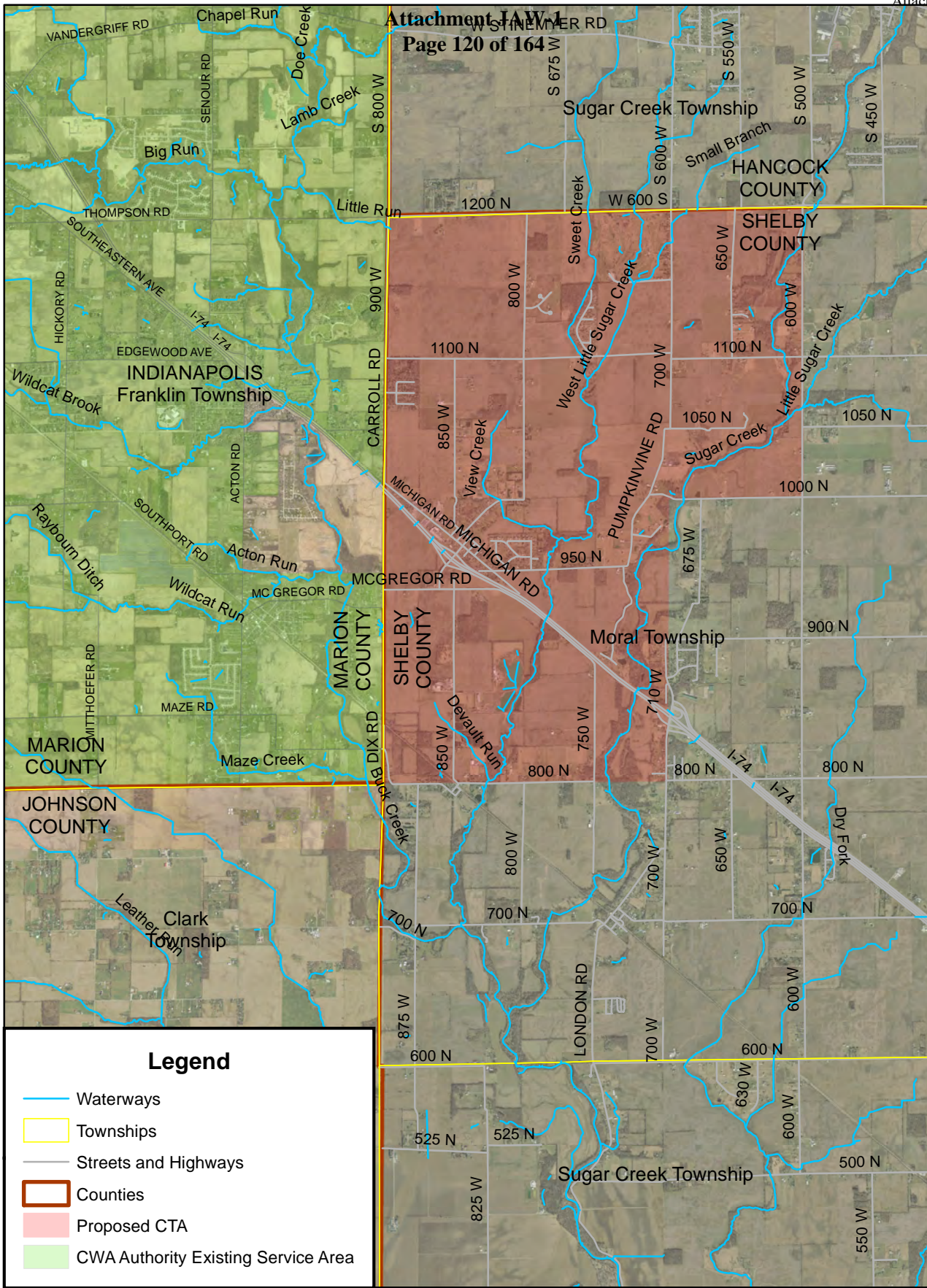


CWA Authority
Proposed CTA Expansion
County Map

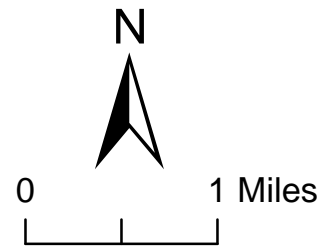


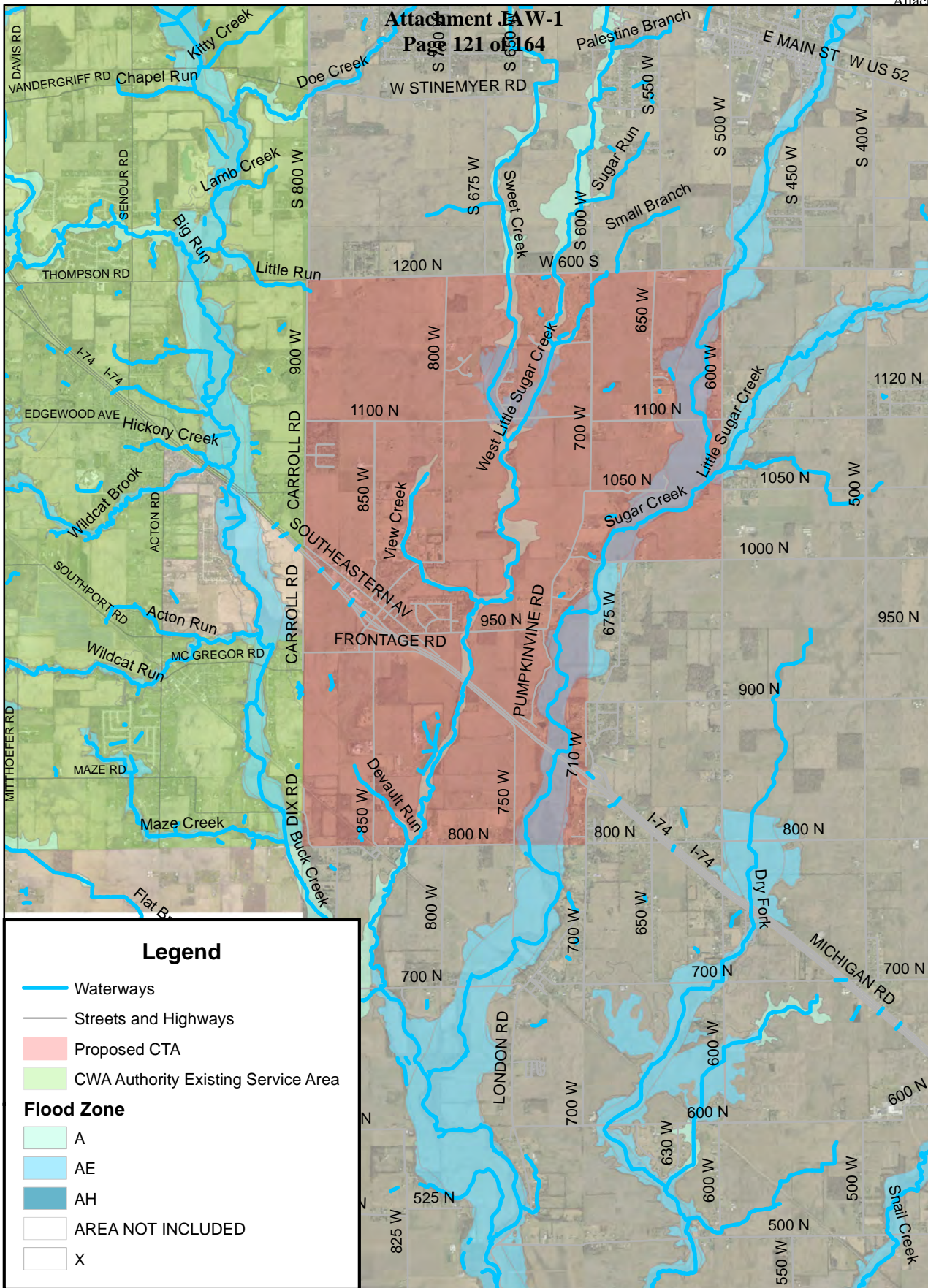
Proposed CTA Legal Description

All of Sections 1, 2, 11, 12, 13, 14, 23 and 24, in Township 14 North, Range 5 East, and all of Sections 6 and 7, in Township 14 North, Range 6 East, in Shelby County, Indiana, containing 6,500 acres, more or less.

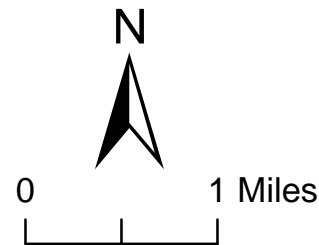


**CWA Authority
Proposed CTA Expansion
Township Map**





**CWA Authority
Proposed CTA Expansion
Flood Plain Map**





2020 North Meridian St. | Indianapolis | IN 46202
CitizensEnergyGroup.com

October 14, 2021

Aqua Indiana, Inc.
Attn: Kari Bennett, President
5750 Castle Creek Parkway North, Suite 314
Indianapolis, IN 46250

Via U.S. Certified Mail #7018 0040 0000 1191 0301

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause No.: 45628

Dear Ms. Bennett,

Please be advised that CWA Authority, Inc. ("CWA") has initiated the above-referenced proceeding requesting the Indiana Utility Regulatory Commission ("Commission") to grant it a Certificate of Territorial Authority ("CTA") to provide wastewater utility service.

As the enclosed Verified Application indicates, the area covered by the requested CTA consists of 6,500 acres located within a portion of Moral Township in Shelby County, Indiana, which is contiguous to CWA's service area in Marion County. The specific location CWA currently seeks to provide service to is identified and described in the map and legal description attached to the Verified Application.

Within thirty (30) days of filing the Verified Application, CWA plans to file a proposed procedural schedule for consideration by the Commission.

CWA AUTHORITY, INC.

JLB/lt
Enclosure

cc: OUCC
Phillip A. Casey



2020 North Meridian St. | Indianapolis | IN 46202
CitizensEnergyGroup.com

October 14, 2021

Doe Creek Sewer Utility, Inc.
Attn: Thomas Astbury, Registered Agent
5940 W. Raymond Street
Indianapolis, IN 46241

Via U.S. Certified Mail #7018 0040 0000 1191 0127

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause No.: 45628

Dear Mr. Astbury,

Please be advised that CWA Authority, Inc. ("CWA") has initiated the above-referenced proceeding requesting the Indiana Utility Regulatory Commission ("Commission") to grant it a Certificate of Territorial Authority ("CTA") to provide wastewater utility service.

As the enclosed Verified Application indicates, the area covered by the requested CTA consists of 6,500 acres located within a portion of Moral Township in Shelby County, Indiana, which is contiguous to CWA's service area in Marion County. The specific location CWA currently seeks to provide service to is identified and described in the map and legal description attached to the Verified Application.

Within thirty (30) days of filing the Verified Application, CWA plans to file a proposed procedural schedule for consideration by the Commission.

CWA AUTHORITY, INC.

JLB/lt
Enclosure

cc: OUCC
4264 S. Creekside Drive, New Palestine, IN 46163



2020 North Meridian St. | Indianapolis | IN 46202
CitizensEnergyGroup.com

October 14, 2021

New Palestine Municipal Sewage Works
Attn: Jim Robinson, Town Manager
42 E. Main Street
New Palestine, IN 46163

Via U.S. Certified Mail #7018 0040 0000 1191 0103

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause No.: 45628

Dear Mr. Robinson,

Please be advised that CWA Authority, Inc. ("CWA") has initiated the above-referenced proceeding requesting the Indiana Utility Regulatory Commission ("Commission") to grant it a Certificate of Territorial Authority ("CTA") to provide wastewater utility service.

As the enclosed Verified Application indicates, the area covered by the requested CTA consists of 6,500 acres located within a portion of Moral Township in Shelby County, Indiana, which is contiguous to CWA's service area in Marion County. The specific location CWA currently seeks to provide service to is identified and described in the map and legal description attached to the Verified Application.

Within thirty (30) days of filing the Verified Application, CWA plans to file a proposed procedural schedule for consideration by the Commission.

CWA AUTHORITY, INC.

JLB/lt
Enclosure

cc: OUCC



2020 North Meridian St. | Indianapolis | IN 46202
CitizensEnergyGroup.com

October 13, 2021

Northwest Shelby County Regional Sewer District
Attn: Jeremy Miller, Board President
105 S. Walnut Street
Fairland, IN 46126

Via U.S. Certified Mail #7018 0040 0000 1191 0318

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause No.: 45628

Dear Mr. Miller,

Please be advised that CWA Authority, Inc. ("CWA") has initiated the above-referenced proceeding requesting the Indiana Utility Regulatory Commission ("Commission") to grant it a Certificate of Territorial Authority ("CTA") to provide wastewater utility service.

As the enclosed Verified Application indicates, the area covered by the requested CTA consists of 6,500 acres located within a portion of Moral Township in Shelby County, Indiana, which is contiguous to CWA's service area in Marion County. The specific location CWA currently seeks to provide service to is identified and described in the map and legal description attached to the Verified Application.

Within thirty (30) days of filing the Verified Application, CWA plans to file a proposed procedural schedule for consideration by the Commission.

CWA AUTHORITY, INC.

JLB/lt
Enclosure

cc: OUCC
Raymond Basile
John D. Cross

**United States Postal Service Certified Mail Receipts will be late-filed as part of this
Attachment JAW-5**

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Sixth Revised Page No. 101
Superseding Fifth Revised Page No. 101

SEWER RATE NO. 1

NONINDUSTRIAL SEWAGE DISPOSAL SERVICE

AVAILABILITY:

The Nonindustrial rates and charges shall be applied to all Nonindustrial Customers of the Utility as defined in Section 1 of the Utility's Terms and Conditions for Sewage Disposal Service. The Monthly Base Charge, together with the variable Treatment Charges, are subject to the Monthly Minimum Charge as noted in the table below.

RATE:

All Nonindustrial Customers of the Utility shall pay a fixed Monthly Base Charge per connection and a variable Treatment Charge as shown in the table below.*

Metered Monthly Rates	Phase 3 Eff. 9/29/21
Monthly Minimum Charge	\$47.69
Monthly Base Charge	\$21.25
Treatment Charges:	
First 7,500 gallons (\$/1,000 gal.)	\$8.8139
First 10 CCF (\$/CCF)	\$6.6104
Over 7,500 gallons (\$/1,000 gal.)	\$9.5412
Over 10 CCF (\$/CCF)	\$7.1559

In addition to the charges above, the Environmental Compliance Plan Recovery Mechanism rate from Rider A, the System Integrity Adjustment rate from Rider B, and the Low Income Customer Assistance Program rate from Rider C shall apply.

MINIMUM BILL PER MONTH:

Each Nonindustrial Customer will pay a Monthly Minimum Charge if the combined Base Charge, Treatment Charges, and Rider A charge are less than the Monthly Minimum Charge. Seasonal customers will receive bills during all Months of the year even when only the Monthly Minimum Charge is due.

***BILLING FOR RESIDENTIAL CUSTOMERS FROM MAY THROUGH NOVEMBER:**

In the case of Residential Customers, the monthly billing for Sewage Disposal Service for the Months of May through November shall be based upon the monthly average of the water billed during the previous Months December through March *or* the Customer's actual usage, whichever is lower. In the event the monthly average of the water billed during such previous Months December through March is less than 3,000 gallons (4 CCF), the Customer will pay the Monthly Minimum Charge reflected in the above table. This would apply to new customers that did not have usage billed in any or all of the Months December through March. CCF refers to 100 cubic feet and is approximately equivalent to 750 gallons.

Issued Pursuant to
Cause No. 45151
July 29, 2019, as modified by
Cause No. 44685-S1 July 26,
2017
Indiana Utility Regulatory Commission
Water/Wastewater Division

EFFECTIVE
September 29, 2021
Indiana Utility Regulatory
Commission

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Sixth Revised Page No. 101A
Superseding Fifth Revised Page No. 101A

SEWER RATE NO. 1 - NONINDUSTRIAL SEWAGE DISPOSAL SERVICE (Cont'd.)

UNMETERED SEWER CUSTOMERS:

All Residential Customers of the Utility who have an unmetered water source shall pay a monthly charge based on the number of occupants in the household. The charge will be calculated using a fixed Monthly Base Charge per connection and a variable Treatment Charge based on 1,800 gallons per occupant.

Unmetered Monthly Rates	Phase 3 Eff. 9/29/21
1 occupant (Monthly Minimum Charge)	\$47.69
2 occupants (3,600 gallons)	\$52.98
3 occupants (5,400 gallons)	\$68.85
4 or more occupants (7,200 gallons)	\$84.71

All other Nonindustrial Customers of the Utility who have an unmetered water source shall pay a monthly charge based on their estimated Monthly discharge. The charge will be calculated using a fixed Monthly Base Charge per connection and a variable Treatment Charge based on tiers below.

Unmetered Monthly Rates	Phase 3 Eff. 9/29/21
Small Flat Rate (5-10 ccf)	\$54.30
Large Flat Rate (11 ccf and above)	\$115.98

In addition to the charges above, the Environmental Compliance Plan Recovery Mechanism rate from Rider A, the System Integrity Adjustment from Rider B, and the Low Income Customer Assistance Program rate from Rider C shall apply to Unmetered Sewer Customers.

WATER USED FOR FIRE PROTECTION:

Where a metered water supply is used for fire protection as well as for other uses, the Utility may, at its sole discretion, make adjustments in the sewer user charge as may be equitable. In such cases the burden of proof as to the type of water usage shall be upon the Customer.

Where a metered water supply is used for fire protection only, the sewer user charge shall not apply.

PAYMENT:

If the bill is not paid within seventeen days after its date of issue, a Late Payment Charge will be added as provided in Appendix A.

Issued Pursuant to
Cause No. 45151
July 29, 2019, as modified by
Cause No. 44685-S1 July 26,
2017
Indiana Utility Regulatory Commission
Water/Wastewater Division

EFFECTIVE
September 29, 2021
Indiana Utility Regulatory
Commission

**CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202**

**Sixth Revised Page No. 102
Superseding Fifth Revised Page No. 102**

SEWER RATE NO. 2

INDUSTRIAL SEWAGE DISPOSAL SERVICE

AVAILABILITY:

The Industrial rates and charges shall be applied to all Industrial Customers of the Utility as defined in Section 1 of the Utility's Terms and Conditions for Sewage Disposal Service. The Monthly Base Charge, together with the variable Treatment Charges, are subject to the Monthly Minimum Charge as noted in the table below and billed according to Rule 7.1.

RATE:

All Industrial Customers of the Utility shall pay a fixed Monthly Base Charge per connection, in addition to variable Treatment and Surveillance Charges as shown in the table below.

Metered Monthly Rates:	Phase 3 Eff. 9/29/21
Monthly Minimum charge	
Tier 1	\$41.59
Tier 2	\$73.07
Tier 3	\$292.80
Tier 4	\$1,934.45
Monthly Base charge	
Tier 1	\$26.61
Tier 2	\$58.09
Tier 3	\$277.82
Tier 4	\$1,919.47
Treatment charges	
Per 1,000 gallons	\$4.7916
Per CCF	\$3.5937
Industrial Surveillance Rate	
Per 1,000 gallons	\$0.2022
Per CCF	\$0.1517
Total Treatment and Surveillance Rate	
Per 1,000 gallons	\$4.9938
Per CCF	\$3.7454

In addition, the Environmental Compliance Plan Recovery Mechanism rate from Rider A and the Low Income Customer Assistance Program rate from Rider C shall apply.

<p>Issued Pursuant to Cause No. 45151 July 29, 2019, as modified by Cause No. 44685-S1 July 26, 2017 Indiana Utility Regulatory Commission Water/Wastewater Division</p>

<p>EFFECTIVE September 29, 2021 Indiana Utility Regulatory Commission</p>

Current base rates effective pursuant to I.U.R.C. Order in Cause No. 45151

Effective: September 29, 2021

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

<p>Issued Pursuant to Cause No. 45151 August 1, 2019 Indiana Utility Regulatory Commission Water/Wastewater Division</p>
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Original Page No. 102A

SEWER RATE NO. 2 – INDUSTRIAL SEWAGE DISPOSAL SERVICE (Cont'd)

TIER CLASSIFICATION:

For the purpose of the application of the Monthly Base Charge and Monthly Minimum Charge, the Tiers are determined based on annual billed treatment volumes per discharge meter or outfall as follows:

- Tier 1: annual billed treatment volumes up to 600 CCF (450 1,000 gallons)
- Tier 2: annual billed treatment volumes greater than 600 CCF (450 1,000 gallons), but less than 4,800 CCF (3,600 1,000 gallons)
- Tier 3: annual billed treatment volumes greater than 4,800 CCF (3,600 1,000 gallons), but less than 36,000 CCF (27,000 1,000 gallons)
- Tier 4: annual billed treatment volumes greater than 36,000 CCF (27,000 1,000 gallons)

The annual billed treatment volumes per discharge meter or outfall will be based on the twelve months ending each February. The tier classifications will become effective each May and remain in effect for twelve months.

For new customers, the tier assigned will be Tier 2. For customers with less than twelve months billed treatment volume, the tier assigned will be based on an annualization of the data available (i.e. monthly average of billed discharge volumes multiplied by twelve).

MINIMUM BILL PER MONTH:

Each Industrial Customer will pay a Monthly Minimum Charge if the combined Monthly Base Charge, together with the variable Treatment and Surveillance Charges are less than the Monthly Minimum Charge.

PAYMENT:

If the bill is not paid within seventeen days after its date of issue, a Late Payment Charge will be added as provided in Appendix A.

SPECIAL PROVISIONS:

Where pretreatment is necessary in order to comply with the Utility's Terms and Conditions for Sewage Disposal or categorical pretreatment standards found in 40 CFR Chapter I, Subchapter N, Parts 405—471 and 327 IAC 5-12-6, Industrial Customers shall be subject to charges and fees established by the Utility's Board to provide for the recovery of costs of the pretreatment program. The applicable charges or fees may include: (1) fees for reimbursement of costs of setting up and operating the pretreatment program; (2) fees for monitoring, inspections and surveillance procedures; (3) fees for reviewing accidental discharge procedures and construction; (4) fees for filing appeals; (5) fees for consistent removal (by the Utility) of pollutants otherwise subject to federal pretreatment standards; (6) other fees as the Board of the Utility may deem necessary to carry out the requirements of the pretreatment program.

Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Original Page No. 103

SEWER RATE NO. 3

FATS, OIL AND GREASE CHARGE

APPLICABILITY:

Customers that are by Ordinance required to be licensed as a food/cooking establishment, or which the Utility, in its sole discretion determines are a commercial food/cooking establishment, shall be subject to a monthly charge for "Fats, Oil & Grease" ("FOG"). The FOG charge will support the additional costs of administering, monitoring, and treating the excessive strength waste associated with these establishments.

RATE:

The monthly FOG charge is shown in the table below.

	Phase 1 Eff. 8/1/19
Monthly Rate	\$30.00

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

First Revised Page No. 104
Superseding Original Page No. 104

SEWER RATE NO. 4

WASTEWATER HAULER RATES

APPLICABILITY:

Wastewater Haulers shall pay the metered rates and charges set forth below.

RATE:

The monthly metered rates in addition to the excessive strength surcharges applicable to Wastewater Haulers are set forth in the table below.

Metered Monthly Rates:	Phase 1 Eff. 11/22/19
Septic and Other Non-Grease: Per 1,000 Gallons	\$56.24
Grease Waste: Per 1,000 Gallons	\$422.08
Excessive Strength Surcharges – Per pound:	
BOD in excess of 6,000 mg/l (\$/lb.)	\$0.3798
TSS in excess of 15,000 mg/l (\$/lb.)	\$0.1559
NH ₃ -N in excess of 400 mg/l (\$/lb.)	\$0.3867

In addition to the charges above, the Environmental Compliance Plan Recovery Mechanism rate from Rider A and the System Integrity Adjustment rate from Rider B shall apply to the Wastewater Hauler metered monthly volumes and not to the Excessive Strength volumes.

Issued Pursuant to
Cause No. 45151
July 29, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

EFFECTIVE
November 22, 2019
Indiana Utility Regulatory
Commission

**CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202**

**Sixth Revised Page No. 105
Superseding Fifth Revised Page No. 105**

SEWER RATE NO. 5

SELF-REPORTING SEWAGE DISPOSAL SERVICE

AVAILABILITY:

The Self-Reporting rates and charges shall be applied to all Self-Reporting Customers of the Utility as defined in Section 1 of the Utility’s Terms and Conditions for Sewage Disposal Service.

RATE:

All Self-Reporting Customers of the Utility shall pay a fixed Monthly Base Charge per discharge meter or outfall, in addition to variable Treatment and Surveillance Charges and Excessive Strength Surcharges as shown in the table below.

Monthly Rates:	Phase 3 Eff. 9/29/21
Monthly Minimum Charge	
Tier 1	\$41.59
Tier 2	\$73.07
Tier 3	\$292.80
Tier 4	\$1,934.45
Monthly Base charge	
Tier 1	\$26.61
Tier 2	\$58.09
Tier 3	\$277.82
Tier 4	\$1,919.47
Treatment charges	
Per 1,000 gallons	\$4.7916
Per CCF	\$3.5937
Industrial Surveillance Rate	
Per 1,000 gallons	\$0.2022
Per CCF	\$0.1517
Total Treatment and Surveillance Rate	
Per 1,000 gallons	\$4.9938
Per CCF	\$3.7454
Excessive Strength Surcharges-- Per pound:	
BOD in excess of 250 mg/l (\$/lb.)	\$0.3798
TSS in excess of 300 mg/l (\$/lb.)	\$0.1559
NH ₃ -N in excess of 20 mg/l (\$/lb.)	\$0.3867

In addition, the Environmental Compliance Plan Recovery Mechanism rate from Rider A and the Low Income Customer Assistance Program rate from Rider C shall apply.

Current base rates effective pursuant to I.U.R.C. Order in Cause No. 45151

**Issued Pursuant to
Cause No. 45151
July 29, 2019, as modified by
Cause No. 44685-S1 July 26,
2017**

Indiana Utility Regulatory Commission
Water/Wastewater Division

EFFECTIVE
September 29, 2021

Indiana Utility Regulatory
Commission

Effective: September 29, 2021

Att
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<p style="text-align: center;">Issued Pursuant to Cause No. 45151 August 1, 2019</p> <p style="text-align: center;">Indiana Utility Regulatory Commission Water/Wastewater Division</p>
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CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Original Page No. 105A

SEWER RATE NO. 5 – SELF-REPORTING SEWAGE DISPOSAL SERVICE (Cont'd)

TIER CLASSIFICATION:

For the purpose of the application of the Monthly Base Charge and Monthly Minimum Charge, the Tiers are determined based on annual billed treatment volumes per discharge meter or outfall as follows:

- Tier 1: annual billed treatment volumes up to 600 CCF (450 1,000 gallons)
- Tier 2: annual billed treatment volumes greater than 600 CCF (450 1,000 gallons), but less than 4,800 CCF (3,600 1,000 gallons)
- Tier 3: annual billed treatment volumes greater than 4,800 CCF (3,600 1,000 gallons), but less than 36,000 CCF (27,000 1,000 gallons)
- Tier 4: annual billed treatment volumes greater than 36,000 CCF (27,000 1,000 gallons)

The annual billed treatment volumes per discharge meter or outfall will be based on the twelve months ending each February. The tier classifications will become effective each May and remain in effect for twelve months.

For new customers, the tier assigned will be Tier 2. For customers with less than twelve months billed treatment volume, the tier assigned will be based on an annualization of the data available (i.e. monthly average of billed discharge volumes multiplied by twelve).

MINIMUM BILL PER MONTH:

Each Self-Reporting Customer will pay a Monthly Minimum Charge, if the combined Monthly Base Charge, together with the variable Treatment and Surveillance Charges are less than the Monthly Minimum Charge.

PAYMENT:

If the bill is not paid within seventeen days after its date of issue, a Late Payment Charge will be added as provided in Appendix A.

SPECIAL PROVISIONS:

Where pretreatment is necessary in order to comply with the Utility's Terms and Conditions for Sewage Disposal or categorical pretreatment standards found in 40 CFR Chapter I, Subchapter N, Parts 405—471 and 327 IAC 5-12-6, Industrial Customers shall be subject to charges and fees established by the Utility's Board to provide for the recovery of costs of the pretreatment program. The applicable charges or fees may include: (1) fees for reimbursement of costs of setting up and operating the pretreatment program; (2) fees for monitoring, inspections and surveillance procedures; (3) fees for reviewing accidental discharge procedures and construction; (4) fees for filing appeals; (5) fees for consistent removal (by the Utility) of pollutants otherwise subject to federal pretreatment standards; (6) other fees as the Board of the Utility may deem necessary to carry out the requirements of the pretreatment program.

In the event a Self-Reporting Customer who does not have BOD, TSS and NH₃-N fails to submit the report required by Rule 5.5.2 for three consecutive months, the Customer will be moved to Sewer Rate No. 2. The Utility shall measure usage and bill the Customer as provided for in Rule 7. The Customer will not be able to return to Sewer Rate No. 5 for twelve Months.

**CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202**

**Fourth Revised Page No. 106
Superseding Third Revised Page No. 106**

SEWER RATE NO. 6

WHOLESALE SEWAGE DISPOSAL SERVICE

AVAILABILITY:

Wholesale Sewage Disposal Service shall be available to all municipalities, conservancy districts and any other entities that own and operate facilities for the collection of wastewater (“Collection Systems”) from retail customers in geographic areas located adjacent to the Utility’s Sewage Disposal System that transport wastewater to the Utility’s Sewage Disposal System for treatment and disposal, subject to satisfying each of the Special Provisions set forth below (collectively referred to below as “Communities,” and individually “Community”).

RATE:

1. Variable Treatment Charge

All Communities receiving Wholesale Sewage Disposal Service shall pay the Variable Treatment as shown in the table below:

Treatment Charge	Phase 3 Eff. 9/29/21
Per 1,000 Gallons	\$3.2654

2. Excessive Strength Surcharges

In addition, all Communities receiving Wholesale Sewage Disposal Service shall pay the Excessive Strength Surcharges shown in the table below:

Excessive Strength Surcharges – per pound	Phase 3 Eff. 9/29/21
BOD in excess of 250 mg/1	\$0.3798
TSS in excess of 300 mg/1	\$0.1559
NH3-N in excess of 20 mg/1	\$0.3867

3. Rates Subject to Change and Other Riders

The foregoing rates are subject to change, with Commission approval. In addition, the Environmental Compliance Plan Recovery Mechanism rate from Rider A, the System Integrity Adjustment rate from Rider B, and any other changes in rates or charges due to adjustment mechanisms approved by the Commission, shall apply. Notwithstanding Ind. Code § 8-1-2-42, whenever the Utility petitions the Commission for a change in rates or charges that affects its rates or charges under this Sewer Rate No. 6, the Utility shall notify each Community in writing thirty (30) days prior to the filing of the petition of its intention to request a change in rates or charges and the estimated amount of the proposed change in rates or charges.

**Current base rates effective pursuant
to I.U.R.C. Order in Cause No. 45151**

<p>Issued Pursuant to Cause No. 45151 July 29, 2019, as modified by Cause No. 44685-S1 July 26, 2017</p> <p>Indiana Utility Regulatory Commission Water/Wastewater Division</p>
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<p>EFFECTIVE September 29, 2021 Indiana Utility Regulatory Commission</p>

Effective: September 29, 2021

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

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Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

Original Page No. 106A

SEWER RATE 6 - WHOLESALE SEWAGE DISPOSAL SERVICE (Cont'd)

MONTHLY MINIMUM CAPACITY CHARGE

Each Community maintaining a metered connection to the Utility's Sewage Disposal System will pay a Monthly Minimum Capacity Charge of \$5,000 per MGD of Average Daily Flow, if the combined Variable Treatment Charge and Excessive Strength Surcharges are less than the Monthly Minimum Capacity Charge.

CAPACITY AND CONNECTIONS

The Utility will certify to each Community that a certain specified capacity Average Daily Flow rate and Peak Daily Flow rate is available for the Community (the "Permitted Capacity"). If a Community plans to construct larger or additional connections to the Utility's system or increase flows to the system in a manner that would exceed the certified Permitted Capacity, the Community shall first submit an application to the Utility for review and approval in the form designated by the Utility. If a Community exceeds its Peak Daily Flow on at least five days during a monthly reporting period, the Utility may assess a surcharge in the amount of ten percent (10%) of the monthly Variable Treatment Charge for the Month of exceedance.

"Average Daily Flow" shall mean the total flow as reflected on the previous 12 monthly reports submitted to CWA divided by the number of days covered by those monthly reports.

"Peak Daily Flow" shall mean the total gallons of flow in any 24-hour period which period begins at 12:00 A.M. and ends at 11:59 P.M.

BILLING AND PAYMENT OF BILLS:

Each month, the Utility will submit a written statement to the Community based on the number of gallons of wastewater discharged from the Community's Collection System into the Utility's Sewage Disposal System shown on the report submitted by the Community during the preceding calendar Month ("Bill"). The Bill will show the computation of the Variable Treatment Charge and the Excessive Strength Surcharge, if any, for such calendar Month. The computation of the Excessive Strength Surcharge will be applied only to flow streams specifically sampled for an Excessive Strength Surcharge and will be calculated based on the monthly flow volume specific to the sampled and analyzed flow stream. Each Bill shall be in a form and content designated by the Utility. If the Community does not pay the Bill within forty-five (45) days after its date of issue, a late payment charge will be added as provided in Appendix A.

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Original Page No. 106B

SEWER RATE 6 - WHOLESALE SEWAGE DISPOSAL SERVICE (Cont'd)

Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

SPECIAL PROVISIONS:

1. Connection Obligations.

The Community must have installed, at the Community's sole cost and expense, any connections, including, but not limited to, the connecting sewer mains and tap-in pipes, as well as any pump stations (collectively, the "Connections"), that are necessary or appropriate to connect the Community's Collection System to the Utility's Sewage Disposal System so that the wastewater generated within the Community's service area and designated by the Community to be treated by the Utility will be transported and discharged into the Utility's Sewage Disposal System. The location of such Connections must be depicted on a map the Community provides to the Utility.

2. Metering Obligations.

The Community is responsible to install, at the Community's sole cost and expense, all Meters designated as necessary or appropriate by the Utility to record the volume of wastewater transported and discharged into the Utility's Sewage Disposal System from the Community's Collection System. The location of all Meters is subject to the Utility's initial approval. The Community will calibrate the Meters not less than one (1) time every calendar year and at other times upon the reasonable request of the Utility. The Community will notify the Utility when such calibration is complete and maintain all records associated with the calibration for a period of two (2) years. After thirty (30) days' notice to the Community, if the Community does not perform the required calibration, notify the Utility, or maintain a record showing the calibration has been performed, the Utility may cause the calibration to be performed at the Community's cost and expense.

3. Obligation to Sample and Test.

The Community is responsible to install at the Community's sole cost and expense, sampling ports ("Sampling Ports") to sample wastewater transported and discharged into the Utility's Sewage Disposal System from the Community's Collection System at locations reasonably designated by the Utility. The Community shall on a frequency determined by the Utility, but no more frequently than monthly, obtain and test samples of the wastewater discharged from the Community's Collection System into the Utility's Sewage Disposal System from each Sampling Port. The tests shall consist of a 24-hour composite sample or other sampling method, as mutually agreed upon by the Community and the Utility. The tests shall determine the pH level, as well as the levels of BOD, TSS, NH₃-N and any other pollutant parameter, as reasonably requested by the Utility in each wastewater sample. The results of such tests shall be reported to the Utility in writing in a form prescribed by the Utility. All measurements, tests and analysis of the characteristics of the wastewater shall be determined in accordance with the latest edition of "Standards Methods of the Examination of Water and Sewage," as published jointly by the American Public Health Association and the Water Pollution Control Federation consistent with 40 CFR Part 136 or by other methods generally accepted under established sanitary engineering practices and approved by the Utility. The Community will be responsible for all costs and expenses associated with the measuring, sampling and testing of the wastewater. However, the Utility may at its sole cost and expense, upon 24 hour notice to the Community, obtain samples of the wastewater being discharged from the Community's Collection System into the Utility's Sewage Disposal System using any of the Sampling Ports, and the same type of sampling and testing methodology as required by the Community, and cause tests of each such sample to be conducted to determine the characteristics of the Community's wastewater.

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Original Page No. 106C

SEWER RATE 6 - WHOLESALE SEWAGE DISPOSAL SERVICE (Cont'd)

4. Additional Connections/Sampling Ports/Meters.

The Community may install and construct, at the Community's sole cost and expense, additional Connections, Sampling Ports or Meters as the Community's Collection System develops over time, subject to obtaining prior written consent of the Utility. In addition, the Utility shall have the right to require the Community to install or construct additional Connections, Sampling Ports or Meters reasonably required and based solely on the Community's flow in excess of the Permitted Capacity to be transmitted to the Utility. The additional Connections/Sampling Ports/Meters will be a part of the Community's Collection System. The Utility will be afforded access to the work sites as is reasonably necessary for the Utility and its representatives to observe, inspect and test the installation and construction of the Community's Connections, Meters and Sampling Ports. The Community will not permit any wastewater to be discharged from the Community's additional Connections, Meters and Sampling Ports into the Utility's Sewage Disposal System until after the Community has completed the installation and construction of the additional Connections, Meters and Sampling Ports and the Utility has inspected and approved such additional Connections, Meters and Sampling Ports.

5. Reporting of Metered Volumes and Sample Results.

The Community will, on or before the last day of each calendar Month, at its sole cost and expense, submit a written report to the Utility in a form specified by the Utility and certified by an appropriate official of the Community as being true, accurate and complete. The written report will contain for the calendar month preceding the calendar month in which the report is delivered, the volumes of wastewater for each metered connection, estimated flow volumes for unmetered connections, and the Excessive Strength Surcharge test results of wastewater discharged from the Community's Collection System into the Utility's Sewage Disposal System. The written report will clearly identify which, if any, flow streams or connections were sampled for Excessive Strength Surcharges, and the results of any such tests.

6. Plans and Specifications.

Each Community receiving Wholesale Sewage Disposal Service as of the effective date of this Sewer Rate No. 6, has submitted plans and specifications for its existing Connections, Meters and Sampling Ports ("Plans and Specifications") to the Utility, and the Utility has approved those Plans and Specifications. For Communities that begin treatment service after January 1, 2017, the Community shall submit Plans and Specifications to the Utility for review and approval at least forty-five (45) days before the scheduled commencement date of the installation and construction.

A Community will submit any proposed modifications, amendments or additions to the Plans and Specifications to the Utility for review and approval at least forty-five (45) days before the scheduled commencement date of the installation and construction of any such improvements or modifications. The Utility will notify the Community in writing of its approval or disapproval of such revisions within thirty (30) days after submission.

<p>Issued Pursuant to Cause No. 45151 August 1, 2019 Indiana Utility Regulatory Commission Water/Wastewater Division</p>
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CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Original Page No. 106D

SEWER RATE 6 - WHOLESALE SEWAGE DISPOSAL SERVICE (Cont'd)

At least annually, the Community and the Utility shall meet to discuss and review the Community's plans for wastewater service as a means for the Utility to be prepared for any significant changes in the Community's flows or loadings. This includes discussions related to significant Community wastewater expansions, changes in the number of customers and type, and other system changes that impact the Utility's ability to operate and maintain the Utility's Sewage Disposal System.

7. Maintenance of Connections, Meters and Sampling Ports.

The Community, at its sole cost and expense, shall at all times maintain the Connections, Meters and Sampling Ports in good working order, condition and repair. In the event the Community fails to keep the Connections, Meters or Sampling Ports in good working order, condition and repair, the Utility may serve written notice on the Community specifying the maintenance, repair or replacement of the Connections, Meters or Sampling Ports which the Utility reasonably believes appropriate. If the Community fails to address the Utility's concerns and does not begin to perform the repairs, maintenance work or replacements within thirty (30) days of its receipt of that notice, the Utility may arrange for the maintenance, repair or replacement of the Connections, Meters, or Sampling Ports and the Community shall pay all reasonable costs and expenses incurred by the Utility in connection with such maintenance, repair or replacement. If the Utility determines the condition of the Connection, Meters or Sampling Ports poses an immediate threat to public health and safety, the Utility, without prior notice to the Community, may arrange for all corrective work to be performed and the Community shall pay reasonable costs incurred by the Utility in connection with such emergency work.

8. Maintenance of Community's Collection System.

The Community will, at its sole cost and expense, maintain the Community's Collection System.

9. Right to Inspect.

In addition to inspecting samples from the Sampling Ports as described in Section 3 of the Special Provisions, the Utility may enter and inspect, and collect samples from, any part of the Community's Collection System. This right of entry and inspection shall extend to public streets, easements and property within which the Community's Collection System is located.

The Utility also shall have, and upon request of the Utility the Community shall use its best efforts to obtain for the Utility's use, the right to enter upon private property to inspect the waste discharge of the Community's industrial customers, including on-site inspection of pretreatment and sewer facilities, observation, measurement, sampling, testing, and access to (with the right to copy) all pertinent compliance records located on the premises of the Community's industrial customers.

Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

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SEWER RATE 6 - WHOLESALE SEWAGE DISPOSAL SERVICE (Cont'd)

10. Further Obligations Regarding Discharges.

All wastewater transported or discharged from the Community's Collection System into the Utility's Sewage Disposal System shall be substantially free from any sand, gravel, street waste, leaves, paper, cyanide, coal tar, oil, grease, acids, dry cleaning fluids, or any other foreign material or industrial wastes, and not contain materials, substances or discharges prohibited by the Sewage Restrictions set forth in Rule 16 of the Utility's Terms and Conditions for Sewage Disposal Service Within Marion County (hereinafter "Prohibited Materials"). Upon discovery or notice that Prohibited Materials in excess of what is considered reasonable are being transported or discharged from the Community's Collection System into the Utility's Sewage Disposal System, and upon notice from the Utility, the Community shall: (i) use reasonable efforts and diligence to identify the source of the Prohibited Materials; (ii) notify the source of the Prohibited Materials to immediately cease the discharge of Prohibited Materials into the Community's Collection System within twenty-four (24) hours after identifying the source of the Prohibited Materials; and (iii) disconnect the source of the Prohibited Materials from the Community's Collection System within forty-eight (48) hours after identification, if the source fails to stop discharging Prohibited Materials into the Community's Collection System within twenty-four (24) hours after the Community's request therefore. The Community also will pay all fines, penalties, costs and expenses that are incurred by the Utility in connection with or as a result of Prohibited Materials being discharged from the Community's Collection System into the Utility's Sewage Disposal System, including, without limitation, all fines levied by the State of Indiana or the EPA. The Community is further responsible for and will pay the Utility upon demand for all damages to the Utility's Sewage Disposal System caused by or resulting from the discharge of any material or waste into the Utility's Sewage Disposal System from the Community's Collection System which causes interference, pass-through, obstruction, damage or any other impairment to the Utility's Sewage Disposal System. The Community also will pay all costs and expenses incurred by the Utility to clean or repair the Utility's Sewage Disposal System and any penalty, fine or cost of compliance with injunctions or other orders of a court or governmental authority imposed against the Utility as a result of any such interference, pass-through, obstruction, damage or impairment, and all other costs and expenses incurred by the Utility as a result of any such interference, pass through, obstruction, damage or impairment, including, but not limited to, expert, consultant, and attorneys' fees.

11. Compliance with Pretreatment Standards.

If the Community does not have a United States Environmental Protection Agency delegated and approved pretreatment program or one implemented by the Indiana Department of Environmental Management, pursuant to 40 CFR Part 403, the Utility is obligated to implement an industrial pretreatment permitting program for industrial users that discharge flows to the Utility's facilities for treatment.

To the extent implementation of a pretreatment program is necessary for industrial customers within a Community, the Community will maintain in full force and effect a Sewer Use Ordinance providing that industrial users of the Community's system will comply with any and all pretreatment requirements set forth by the Utility and as required by any applicable federal or state statute or rule, and those currently established in 40 CFR Chapter I, Parts 405-471, the pretreatment standards set forth in 327 IAC 5-16 *et seq.*, as well as any rules and regulations adopted by Resolution of the Utility's Board in furtherance of those pretreatment standards. In addition, the Utility may require an annual certification from the Community certifying its compliance with pretreatment requirements, including results of surveys to determine whether industrial users discharge into the Community's system.

Current base rates effective pursuant
to I.U.R.C. Order in Cause No. 45151

Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

Effective: August 1, 2019

Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

Original Page No. 201

RIDER A

ENVIRONMENTAL COMPLIANCE PLAN RECOVERY MECHANISM

The charges specified in Sewer Rate Nos. 1, 2, 4, 5, and 6 shall be adjusted from time to time to reflect an Environmental Compliance Plan ("ECP") Recovery Mechanism. Pursuant to Indiana Code 8-1-28, the ECP Recovery Mechanism shall recover the costs of complying in whole or in part with the requirements of the Safe Drinking Water Act or the Clean Water Act.

RATE:

To be determined.

CWA Authority, Inc.
2020 Meridian Street
Indianapolis, Indiana 46202

Second Revised Page No. 202
Superseding First Revised Page No. 202

RIDER B

SYSTEM INTEGRITY ADJUSTMENT

Pursuant to Indiana Code 8-1-31.5, the System Integrity Adjustment (SIA) shall recover from or credit to Customers served under Sewer Rates 1, 4 and 6, the difference between the Utility's actual revenues for a twelve (12) month period and authorized revenues for the same twelve (12) month period.

RATE:

The applicable SIA rate shall be applied to each unit of measure of metered sewage disposal service use each month.

Applicable SIA Rate **\$0.0000 Per 1,000 gallons**
\$0.0000 Per CCF

In any given month, if a Nonindustrial Customer is billed the Sewer Rate No. 1 Monthly Minimum Charge, an additional \$0.00 will be added for the SIA.

RATE 1 UNMETERED SEWER CUSTOMERS:

All Residential Customers of the Utility who have an unmetered water source shall incur the applicable SIA based on the number of occupants in the household.

Residential	Per Month
1 occupant	\$0.00
2 occupants	\$0.00
3 occupants	\$0.00
4 or more occupants	\$0.00

All other Nonindustrial Customers of the Utility who have an unmetered water source shall pay the applicable SIA.

All Other Nonindustrial	Per Month
Small Flat Rate	\$0.00
Large Flat Rate	\$0.00

Issued Pursuant to
Cause No. 44990 SIA 2
December 19, 2018
Indiana Utility Regulatory Commission
Water/Wastewater Division

EFFECTIVE
March 1, 2020
Indiana Utility Regulatory
Commission

**CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202**

Original Page No. 203

RIDER C

LOW INCOME CUSTOMER ASSISTANCE PROGRAM

APPLICABILITY:

The Low Income Customer Assistance Program ("LICAP") Rider is established pursuant to Ind. Code § 8-1-2-46(c) to recover the cost of providing an assistance program for qualifying low-income Nonindustrial Customers served under Sewer Rate No. 1. The charge applicable under the LICAP Rider shall be applied to all Customers served under Sewer Rate Nos. 1, 2, and 5 and shall be at the rate set forth below.

RATES AND CHARGES:

All Customers of the Utility served under Sewer Rate Nos. 1, 2, and 5 shall pay a fixed charge per Month as shown below:

Applicable LICAP Rate \$ 0.45 Per Month

Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

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APPENDIX A

NON-RECURRING CHARGES

1. **INDUSTRIAL CUSTOMER LATE REPORTING CHARGE**

In the event that a Self-Reporting Customer fails to submit the report required under Section 5 of the Utility's Terms and Conditions for Sewage Disposal Service by the twenty-fifth (25th) day of the following Month, the Self-Reporting Customer shall pay late reporting charges according to the following schedule:

Late Reports Filed in any Year	Charge
First late report	No charge
Second late report	No charge
Each subsequent late report	\$100.00

2. **LATE PAYMENT CHARGE**

A Utility Services bill that has remained unpaid for a period of more than seventeen (17) days following the mailing of the bill shall be considered delinquent in accordance with Section 5 of the Utility's Terms and Conditions for Sewage Disposal Service. In such event, a Late Payment Charge will be added to the Utility Services bill in the amount of ten percent (10%) of the first three dollars (\$3.00) of Sewage Disposal Service and three percent (3%) on the amount in excess of three dollars (\$3.00).

3. **DELINQUENT ACCOUNT TRIP CHARGE**

A charge may be made for each visit to the Customer's Premises regarding a delinquent account. Visits may result in the disconnection of service. Such charge to the Customer shall be fourteen dollars (\$14.00).

4. **RECONNECTION CHARGE**

When Sewage Disposal Service is turned off for non-payment of a bill, or for any reason beyond the control of the Utility, and a reconnection of Sewage Disposal Service is required by any one Customer, a charge will be made by the Utility to cover the cost of discontinuance and reconnection of service; such charge shall be forty-four dollars (\$44.00) per Meter or Customer. The Customer shall pay the Reconnection Charge, along with any Sewage Disposal Service arrears due, and comply with all other requirements set forth in Section 6 of the Utility's Terms and Conditions for Sewage Disposal Service before Sewage Disposal Service will be reconnected.

5. **RETURNED CHECK CHARGE**

Each Customer that causes a check for Utility Services to be returned by their financial institution due to their account not having sufficient funds to allow such check to be processed, shall be charged eleven dollars (\$11.00) per check to cover the cost the Utility incurs to re-process the original transaction.

6. **RATE FOR TEMPORARY USERS**

Sewage Disposal Service furnished to temporary users, such as contractors, shall be charged on the basis of schedules set forth in Rate 1 or Rate 2 depending on the characteristics of the temporary user. The amount of usage shall be estimated and established by the Utility before service is rendered.

Issued Pursuant to
Cause No. 45151
August 1, 2019
Indiana Utility Regulatory Commission
Water/Wastewater Division

CWA Authority, Inc.
2020 North Meridian Street
Indianapolis, Indiana 46202

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APPENDIX B

MISCELLANEOUS FEES

1. CONNECTION FEE

A baseline Connection Fee of two thousand five hundred thirty dollars (\$2,530.00) per equivalent dwelling unit ("EDU"), will be assessed for all new connections to the Sewage Disposal System. A new connection includes new sewer service or modification of an existing sewer service agreement; however, replacement or repair of an existing individual Building Sewer that does not increase EDU's will not constitute a new connection. EDU's shall be determined in accordance with industry standards and reflect the greater of the actual daily flow requirements (per 327 IAC 3), the area ratio of the water meter size serving a particular user, or such other means of determination deemed appropriate by the Utility. One (1) EDU shall be estimated as equal to three hundred ten (310) gallons per day.

2. EXTENSION, AMENDMENT, OR TRANSFER OF AUTHORITY TO CONNECT TO THE SEWAGE DISPOSAL SYSTEM

The fee for extending the authority granted by the Utility to connect to the Sewage Disposal System beyond 180 days shall be \$30. The fee for amending an application for connection shall be \$30. The fee for transferring the authority granted by the Utility to connect to the Sewage Disposal System, which transfer must be done with the consent of the Utility shall be \$30.

3. BUILDING SEWER FEES

The Utility shall bill the following fees when a Building Sewer permit is required to construct, repair, modify, connect or abandon any Sanitary Sewer Facility within the Utility's service area. The fees are as follows:

3.1 Building Sewer Application and Permit Fee: A fee of \$209 will be assessed for the application and issuance of a Building Sewer permit.

3.2 Building Sewer Re-Inspection Fee: In the event a Building Sewer fails the initial inspection, a fee of \$75 will be assessed for each additional inspection.

4. SANITARY SEWER FACILITY FEES

The Utility shall bill the following fees when a Sanitary Sewer Facility permit is required to construct, repair, modify, connect or abandon any Sanitary Sewer Facility within the Utility's service area. The fees are as follows:

4.1 Sanitary Sewer Facility Application, Initial Plan and Construction Review Fee: A fee of \$657 will be assessed for the initial application, plan submission and review.

4.2 Sanitary Sewer Facility Additional Plan Review Fee: A fee of \$247 will be assessed for each additional revised plan submission and subsequent review.

4.3 Sanitary Sewer Facility Construction Management Fee: A fee of \$420 will be assessed at the time the application is made for a Sanitary Sewer Facility permit for the management of construction scheduling, close out, and post construction record retention.

4.4 Sanitary Sewer Facility Construction Inspection Services Fee: A fee of \$65 per hour will be assessed for construction inspection services provided throughout all work and construction performed on or associated with the Sanitary Sewer Facility.

CWA Authority, Inc.
Combined Statements of Financial Position (Unaudited)
(In Thousands)

	<u>At September 30,</u> <u>2020</u>	<u>At September 30,</u> <u>2019</u>
ASSETS		
Property, plant and equipment	\$ 2,154,925	\$ 2,008,711
Investments	224,619	193,367
Cash and cash equivalents	108,750	38,604
Other current assets	49,377	46,591
Deferred charges and other non-current assets	4,401	4,969
TOTAL ASSETS	\$ 2,542,072	\$ 2,292,242
CAPITALIZATION AND LIABILITIES		
Equity	\$ 144,016	\$ 79,092
Long-term debt (excluding current maturities)	2,115,839	1,866,986
Retirement benefits and other long-term liabilities	103,439	172,099
Current maturities of long-term debt	45,283	39,006
Short-term borrowings	-	-
Current liabilities	133,495	135,059
TOTAL CAPITALIZATION AND LIABILITIES	\$ 2,542,072	\$ 2,292,242

CWA Authority, Inc.
Statements of Operations (Unaudited)
(In Thousands)

	Fiscal Year Ended September 30,	
	2020	2019
Operating revenues	\$ 296,978	\$ 274,804
Operating expenses:		
Cost of goods sold	-	-
Operations and maintenance	79,064	78,832
Depreciation and amortization	58,038	63,996
Taxes	28,502	27,480
Total operating expenses	<u>165,604</u>	<u>170,308</u>
Operating income	<u>131,374</u>	<u>104,496</u>
Other income (expense), net		
Interest income	1,722	3,381
Non-operating post-employment benefits, net	(241)	118
Other	158	81
Total other income, net	<u>1,639</u>	<u>3,580</u>
Income before interest charges	<u>133,013</u>	<u>108,076</u>
Interest charges:		
Interest on long-term debt	91,786	86,364
Other interest including net premium amortization	(24,444)	(17,187)
Total interest charges	<u>67,342</u>	<u>69,177</u>
Net income	<u><u>\$ 65,671</u></u>	<u><u>\$ 38,899</u></u>

MEMORANDUM OF UNDERSTANDING

BETWEEN CWA AUTHORITY, INC.

and

THE BOARD OF COMMISSIONERS FOR SHELBY COUNTY, INDIANA

This Memorandum of Understanding (“MOU”), dated effective the last date that all Parties hereto sign this document, including in counterparts (the “Effective Date”), sets forth the mutual understanding of CWA Authority, Inc. (“CWA”) and the Board of Commissioners for Shelby County, Indiana (the “County”) with respect to the provision of wastewater collection and treatment service by CWA within Shelby County, Indiana (CWA and the County are each a “Party” and collectively are the “Parties”):

WHEREAS, CWA owns a regulated wastewater collection and treatment system serving retail and wholesale customers in the City of Indianapolis and surrounding communities; and

WHEREAS, the Shelby County Redevelopment Commission, in 2020, passed a declaratory resolution initiating the establishment of a proposed economic development area in northwestern Shelby County, which was later confirmed by a resolution passed by the Plan Commission, in accordance with the County’s Comprehensive Plan for the area; and

WHEREAS, in order to move forward, the economic development plan identified above requires that certain critical infrastructure be installed to serve the area, including for wastewater collection and treatment service; and

WHEREAS, CWA is willing, subject to approval by the Indiana Utility Regulatory Commission (“IURC”), to expand its wastewater collection and treatment services into Shelby County, Indiana, as set forth below and pursuant to the terms and conditions described herein;

NOW, THEREFORE, CWA and the County hereby set forth their mutual understanding in this MOU as follows:

1. **Expansion of CWA’s Sanitary Sewer System.** CWA shall install the infrastructure needed to extend its existing wastewater collection and treatment system (the “Sanitary Sewer System”) in order to provide wastewater collection and treatment services (the “Utility Services”) within the proposed expansion territory inside of Shelby County, Indiana, as depicted in the attached **Exhibit A** (the “Expansion Area”). Extension of the Sanitary Sewer System in order to provide the Utility Service within the Expansion Area shall occur in a phased approach. The initial phase (Phase I) will provide up to 500,000 gallons per day of capacity for the Expansion Area and allow for future capacity expansions. The Parties will use commercially reasonable efforts to complete Phase I implementation by **July 1, 2022**. All infrastructure installed by CWA to provide the Utility Services within the Expansion Area shall be owned by CWA, and CWA shall be responsible for the operation of such infrastructure, once installed, as part of its Sanitary Sewer System.
2. **Certificate of Territorial Authority.** Prior to the Phase I implementation, CWA shall take reasonable steps to seek approval from the IURC for a Certificate of Territorial Authority

("CTA") to provide the Utility Services within the Expansion Area. After approval of the CTA, CWA's *Sewage Disposal Service Tariff Rates, Terms and Conditions for Sewage Disposal Service Within Marion County, Indiana and Contiguous Areas* shall apply within the Expansion Area. The Parties agree that if the IURC declines to grant the requested CTA to CWA, or if CWA is unable to provide the Utility Services within the Expansion Area for any other reason beyond CWA's control, neither Party shall have any further obligation to the other.

3. County's Responsibility. The County agrees to provide both financial and facility contributions to CWA to assist with Phase I implementation and to cooperate in good faith with CWA to obtain the approval of the CTA from the IURC. Such cooperation shall include, but not be limited to, providing letters of support consistent with this MOU from the appropriate County officials on or before October 18, 2021, and facilitating the timely gathering of additional letters of support from other key stakeholders, such as the Shelby County Development Corporation, as needed. Moreover, the County agrees to provide CWA with the franchise rights and any other approvals from the County needed for CWA to provide the Utility Services within the Expansion Area.
4. CWA's Responsibility. CWA agrees to commence design and construction activities for all lift station and force main components to facilitate Phase I implementation upon execution of this MOU. Lift station and force main components shall utilize the installed lift station tank structure near the intersection of McGregor Road and Carroll Road in Shelby County (Tank Structure). CWA will be responsible for all land and easement acquisition to extend Utility Service to the Tank Structure.
5. Phase I Contributions. The County agrees to provide the following financial and facility contributions to CWA, by **March 1, 2022**, to assist with Phase I implementation:
 - a. Installed lift station Tank Structure located at or near the intersection of McGregor Road and Carroll Road and associated easement;
 - b. Installed gravity sewers connecting above lift station and Shelby County customers and associated easements; and
 - c. A one-time financial contribution of \$2,000,000.
 - d. CWA agrees, subject to IURC approval, to waive wastewater connection fees within the Northwest Shelby County Tax Increment Finance District as depicted in the attached Exhibit B for a period of 10 years.
6. Future Expansions. Following Phase I implementation, CWA and the County agree to work cooperatively, as needed, toward planning for the additional infrastructure necessary to extend the Utility Services to other parts of the Expansion Area. The Parties agree that no additional contributions beyond what is customary and in accordance with the CWA Tariff and Terms and Conditions will be required from developers for future expansions. To be clear, other than a main extension deposit or other charge imposed in accordance with CWA's Tariff and Terms and Conditions to serve a building owned by Shelby County, Shelby County will not be required to contribute to future expansions.

IN WITNESS WHEREOF, the undersigned certify that they are duly authorized and empowered to execute this MOU as of the Effective Date.

“CWA”

CWA Authority, Inc.

By: *Jeffrey A. White*

Title: *Vice President*

Date: *10/18/21*

“COUNTY”

The Board of Commissioners for Shelby County, Indiana

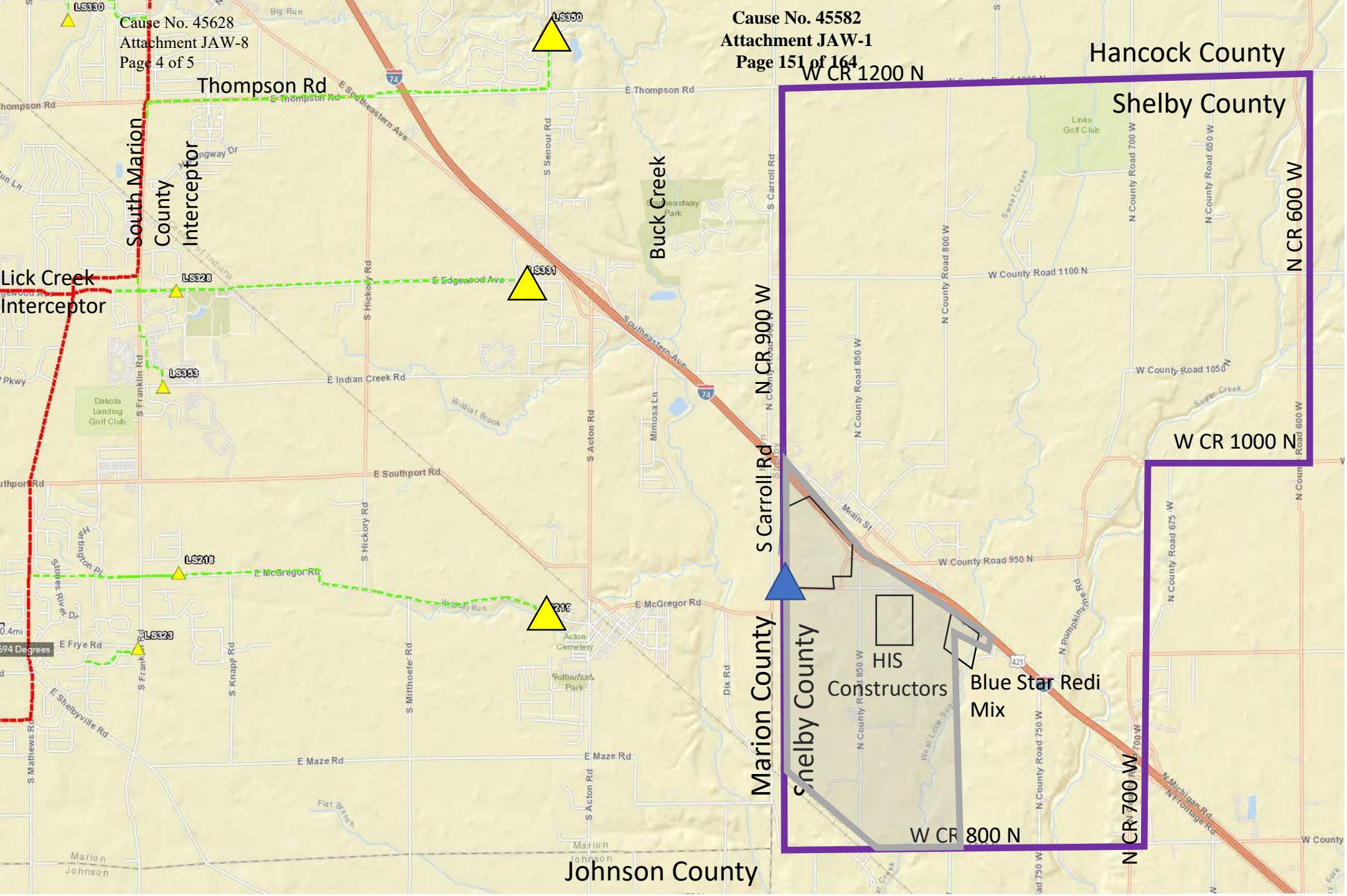
By: *Kevin High*

Title: *Commissioner*






Date: *10/18/2021*

Attest:

Amy H. Blackman
County Auditor
10/18/21

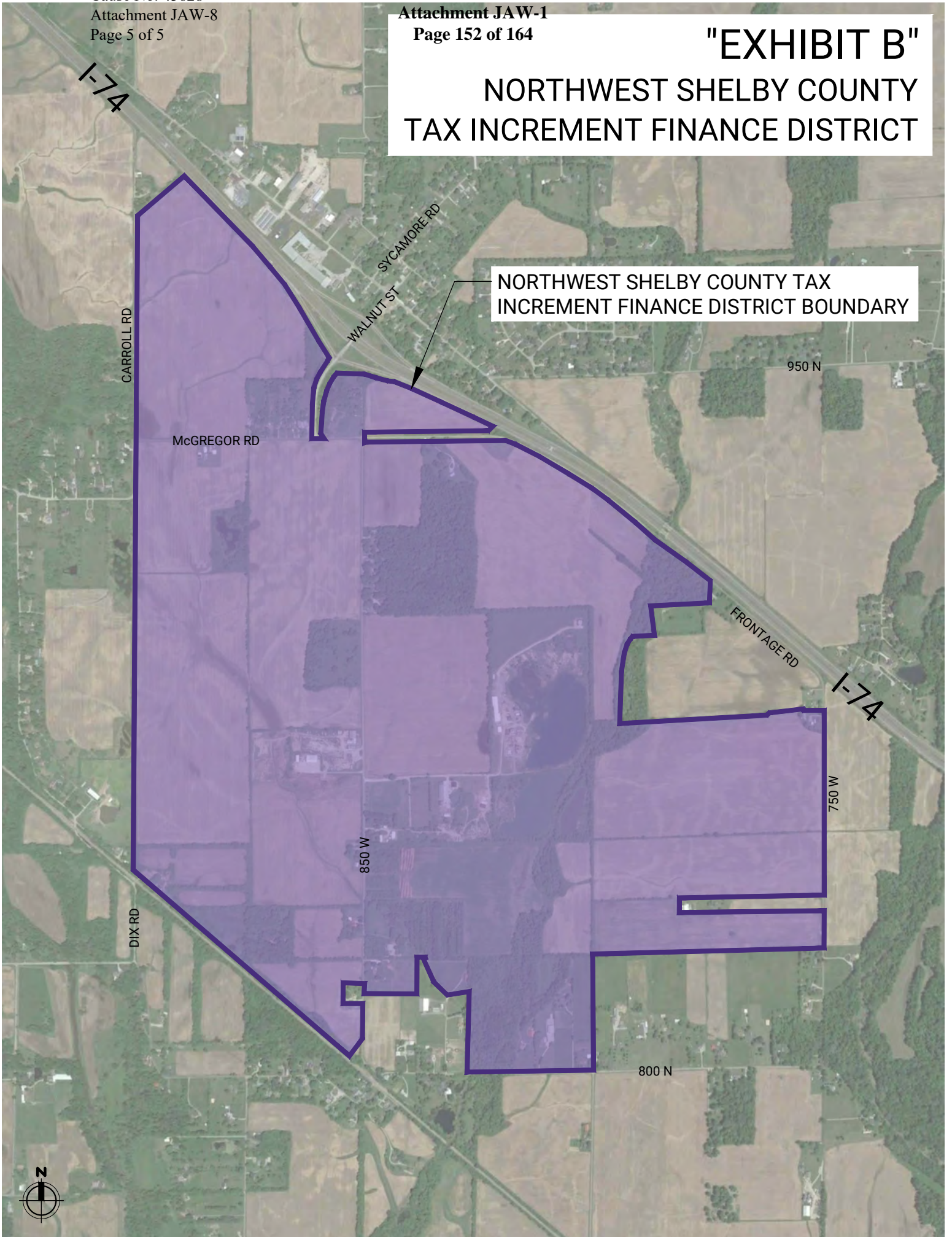


Approximate Scale
1:1,000

-  CTA Boundary
-  Proposed Development
-  Tax Increment Financing (TIF) Boundary
-  Lift Station (Existing)
-  Lift Station X

"EXHIBIT B"

NORTHWEST SHELBY COUNTY TAX INCREMENT FINANCE DISTRICT





16 Public Square, Suite A
Shelbyville, IN 46176
Telephone: 317-398-8903
www.shelbydevelopment.com

October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

To Whom it may Concern,

The Shelby County Development Corporation is fully in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. Our office has been working with numerous prospects considering investments in this area and sanitary sewer service is a critical need for continued growth.

This area is experiencing significant development and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,

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

Brian Asher
Executive Director
Shelby County Development Corporation

**AVISON
YOUNG**

10 W Market Street
Suite 1800
Indianapolis, IN 46204
United States

T +1 317 210 8801
F +1 317 210 8802

avisonyoung.com



October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

To Whom it may Concern,

Avison Young represents several property owners in the Northwest Shelby County TIF area. We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Ehret", written over a light blue circular stamp or watermark.

Bill Ehret, SIOR
Principal, Managing Director



10 W Market Street
Suite 1800
Indianapolis, IN 46204
United States

T +1 317 210 8801
F +1 317 210 8802

avisonyoung.com



October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

To Whom it may Concern,

Avison Young represents several property owners in the Northwest Shelby County TIF area. We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Schaub'. The signature is fluid and cursive.

Steve Schaub
Senior Vice President



10 W Market Street
Suite 1800
Indianapolis, IN 46204
United States

T +1 317 210 8801
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avisonyoung.com



October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

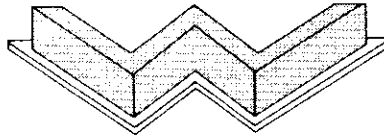
To Whom it may Concern,

Avison Young represents several property owners in the Northwest Shelby County TIF area. We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stan Burton".

Stan Burton
Associate



WEBER CONCRETE CONSTRUCTION

PO BOX 837 ZIONSVILLE, IN 46077

Re: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

October 22, 2021

To whom it may concern,

I represent the Blue Star Redi Mix which is in the process of constructing a new concrete ready mix batch plant within the Northwest Shelby County TIF district. We are in total support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. This area is experiencing significant growth and CWA is the best positioned wastewater provider to deliver sewer service in a safe, reliable and affordable manner, considering CWA's existing advanced wastewater treatment plants and large customer base.

We ask that CWA's request be considered and approved.

Sincerely,

Tim R. Eckert
Business Manager
Blue Star Redi Mix



October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

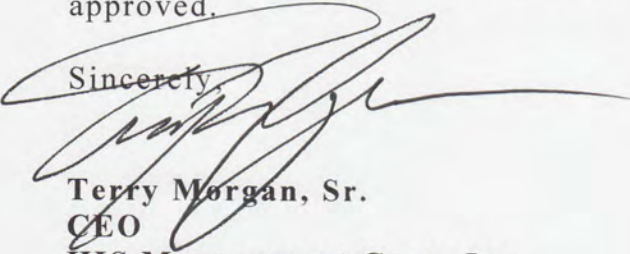
To Whom it may Concern,

HIS Constructors, Inc. is in the process of constructing our new headquarters within the Northwest Shelby County TIF area. Our new facility needs sanitary sewer service.

We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area.

This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. CWA already has water service in this area and will provide water to my facility and the other facilities planned and under construction. We support the concept of a single service provider for water and sewer. We ask that CWA's request be approved.

Sincerely,


Terry Morgan, Sr.
CEO

HIS Management Corp, Inc.

HIS Management Corp, Inc.
5150 E. 65th Street
Indianapolis, IN 46220
317-284-1195

Pleasant View Commerce Park LLC
524 N Harrison Street
Shelbyville, Indiana 46176

October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

To Whom it may Concern,

Pleasant View Commerce Park, LLC is a land owner within the Northwest Shelby County TIF area. We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,



Ronald Kelsay, Manager
Pleasant View Commerce Park LLC



October 20, 2021

**RE: Application of CWA Authority, Inc for a Certificate of
Territorial Authority
Cause Nos. 45582 and 45628**

To Whom it may Concern,

Runnebohm Construction is currently involved in the development and construction of multiple projects in the Northwest Shelby County TIF area that need permanent and reliable wastewater service.

We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area.

This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. King", is written over a light blue horizontal line.

Christopher M. King
Principal, Executive Vice President
Runnebohm Construction Company, Inc.



October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

To Whom it may Concern,

Browning Investments is considering potential development projects within the Northwest Shelby County TIF area. We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500-acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Sussemichel'.

Mark Sussemichel
Chief Development Officer

Board of Commissioners
Kevin Nigh
Don Parker
Chris Ross
John C. DePrez, IV, Attorney



Shelby County, Indiana
25 West Polk Street, Room 206
Shelbyville, Indiana 46176
Office (317) 392-6330
Fax (317) 392-6393

October 20, 2021

RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

To Whom it may Concern,

We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500- acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area. This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base.

On October 18, 2021, the Shelby County Commissioners unanimously entered into a Memorandum of Understanding with CWA for the provision of wastewater collection and treatment service by CWA within Shelby County. Accordingly, we ask that CWA's request be approved.

Sincerely,

Kevin Nigh
President
Shelby County Commissioners

cc: **Shelby County Commissioner Don Parker**
Shelby County Commissioner Chris Ross

Shelby County Council
Shelby County, Indiana
25 West Polk Street
Shelbyville, Indiana 46176

October 20, 2021

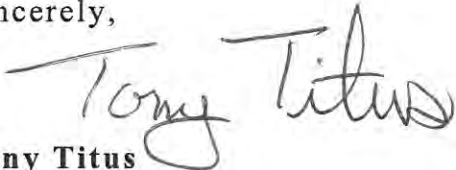
RE: Application of CWA Authority, Inc for a Certificate of Territorial Authority
Cause Nos. 45582 and 45628

To Whom it may Concern,

We are in support of CWA Authority, Inc.'s ("CWA") request to the Indiana Utility Regulatory Commission for a Certificate of Territorial Authority to provide sewer service to the proposed 6,500- acre area within Moral Township, Shelby County, which includes the Northwest Shelby County TIF area.

This area is experiencing significant growth and CWA is the best positioned wastewater provider to provide sewer service to this area in a safe, reliable, and affordable manner, especially given CWA's existing advanced wastewater treatment plants and large customer base. We ask that CWA's request be approved.

Sincerely,



Tony Titus
President
Shelby County Council



Indiana Utility Regulatory Commission
PNC Center
101 W. Washington Street, Suite 1500E
Indianapolis, IN 46204

September 14, 2021

Commissioners:

The Builders Association of Greater Indianapolis would like to stress our support for Citizens Energy Group and CWA Authority's proposed expansion of service into Shelby County and continued investments in the system.

As the organization that represents area homebuilders, we know Citizens' continues to communicate and collaborate with builders and developers in the single-family development community. Their commitment to invest in infrastructure is evident.

Sincerely,

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

Kate Collins
Government Affairs Director
Builders Association of Greater Indianapolis