STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

APPLICATION OF PLEASANTVIEW UTILITIES, INC. FOR A NEW SCHEDULE OF RATES AND CHARGES FOR WASTEWATER SERVICE	))))	**CAUSE NO. 46122-U**

PUBLIC'S EXHIBIT NO. 3

TESTIMONY OF JAMES T. PARKS

ON BEHALF OF

THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

December 12, 2024

TESTIMONY OF OUCC WITNESS JAMES T. PARKS
CAUSE NO. 46122-U
PLEASANTVIEW UTILITIES, INC.

Q: Please state your name and business address.

A: My name is James T. Parks, P.E., and my business address is 115 W. Washington Street, Suite 1500 South, Indianapolis, Indiana 46204.

Q: By whom are you employed and in what capacity?

A: I am employed by the Office of Utility Consumer Counselor ("OUCC") as a Senior Utility Analyst in the Wastewater/Wastewater Division. My qualifications and experience are described in Appendix A.

Q: What relief does Pleasantview Utilities, Inc. seek in this cause?

A: Pleasantview Utilities, Inc. ("Pleasantview" or "Applicant") requests an across-the-board sewer rate increase of 55.57% to generate $45,359 in additional revenues to produce pro forma revenues of $126,984. Pleasantview seeks to raise its Residential Flat monthly sewer charge (unmetered) by $23.49 from the current $42.27 to $65.76.

Q: Has Applicant constructed any capital projects other than sewer system repairs or wastewater treatment plant ("WWTP") equipment replacements since the WWTP proposed upgrades in the 2013 rate case that were completed?

A: No. [1]

Q: Is Applicant seeking preapproval for sewer system or WWTP capital projects?

A: No. Applicant has not identified and is not seeking to build any projects for the collection system or WWTP.

[1] In Cause No. 44351-U, Pleasantview's Flat Monthly Sewer Charge was raised in two phases with the Phase II rate of $45.77 in effect on May 8, 2015, based on Applicant's statement that all updates had been made / installed at the WWTP. The Commission later reduced the Phase II rate to $42.86 effective on February 1, 2020, for failure to have completed all capital projects as previously claimed. Due to the Utility Receipts Tax repeal, the sewer rate was reduced to $42.27 on June 28, 2022.

Q: What is the purpose of your testimony?

A: I testify that Pleasantview continues to have excessive infiltration and inflow ("I&I") in its sewer collection system producing highly variable WWTP flows during wet weather events. These high flows cause solids to washout from the aeration basins that carryover into the polishing ponds, cause poor treatment and at times complete loss of treatment, and create effluent violations leading to IDEM enforcement actions and fines. In multiple IDEM inspections, enforcement actions and Causes before the Commission, Pleasantview's sewers and wastewater treatment plant ("WWTP") have been judged to be deteriorated due to age and lack of maintenance. This is exhibited by the collection system's excessive I&I. Age and lack of maintenance are also exhibited by extensive corrosion of steel treatment tanks and other WWTP equipment.[2]

I testify that effluent discharges from the WWTP are in chronic noncompliance with Applicant's NPDES permit limits especially for ammonia-nitrogen and dissolved oxygen.[3] Applicant has reported effluent violations in 20 of the last 24 months.

I testify Applicant does not properly fill out its Discharge Monitoring Reports ("DMR"), Monthly Reports of Operation ("MRO"), and IURC Annual Reports, has an inadequate asset inventory and system map, and has no Asset Management Plan for replacement of its deteriorated sewers and WWTP.

Q: What did you review to prepare your testimony?

A: I reviewed Pleasantview's Small Utility application filed September 13, 2024. I

[2] IDEM Inspection Summary/ Noncompliance Letters dated June 10, 2020, September 1, 2021, March 4, 2022, May 2, 2024. *See* Attachment JTP-1.

[3] NPDES stands for National Pollutant Discharge Elimination System.

reviewed relevant portions of final orders from prior rate cases.[4] I toured Pleasantview's WWTP and collection system on November 21, 2024 accompanied by Scott Bell and Carl Seals of the OUCC and Becky Ruark of IDEM.[5] I reviewed information available on IDEM's Virtual File Cabinet including NPDES applications, NPDES permits, Land Application of Biosolids (sludge) permits and monthly reports, Discharge Monitoring Reports ("DMR"), Monthly Reports of Operation ("MRO"), WWTP inspection reports, IDEM enforcement actions, and compliance correspondence. I wrote data request questions and reviewed Pleasantview's responses.

Q: If you do not discuss a specific topic or adjustment, does that mean you agree with other parties filing testimony in this case?

A: No. My electing not to discuss a specific topic or issue does not indicate my approval or agreement. My opinions and the OUCC's positions are limited to those opinions and positions I affirmatively express.

I. PLEASANTVIEW UTILITIES, INC. CHARACTERISTICS

Q: Please describe Pleasantview Utilities, Inc. characteristics.

A: Pleasantview Utilities, Inc. is a Class C investor-owned public utility providing water and sewer utility service to approximately 203 customers in the Pleasantview subdivision located in an unincorporated area west of the City of Connersville, in Fayette County, Indiana.[6] The 203 metered residential customers are primarily single-family residences (179 homes) but also include 24 apartments in four single story

[4] Final Order Cause No. 42202, September 25, 2002, Final Order Cause No. 43313, April 23, 2008, and Final Order Cause No. 44351-U, March 26, 2014

[5] Becky Ruark is a Senior Environmental Manager and Wastewater Inspector for the Indiana Department of Environmental Management ("IDEM") for five counties in East Central Indiana, including Fayette County.

[6] 2023 IURC Annual Report, p. S-1. Pleasantview does not have any multi-family, commercial, industrial, or public authority customers.

buildings. Applicant is an S corporation whose common stock is 100% owned by Mr. Matthew Sherck. In addition to operating the Utility as President and sole shareholder, Mr. Sherck has been employed since 1994 by the Fayette County Health Department as an Environmental Specialist. The utility has one other employee. Pleasantview's wastewater treatment plant has been operated by a series of contract certified operators. It appears the current operator, Mr. Michael Stuckey, was contracted in June 2024.

II. PLEASANTVIEW UTILITIES SEWER SYSTEM

Q: Please describe Applicant's wastewater collection system.

A: Pleasantview's collection system has always been 100% separate sanitary sewers by design with no permitted sanitary sewer overflow ("SSO") points. Much of Applicant's collection system, installed beginning in possibly 1970 or earlier, is over 50 years old. Based on property records and the 1972 USGS topographic map, home construction began before 1971.[7] Sewers consist entirely of 8-inch diameter gravity mains with no lift stations or WWTP raw sewage pump station. Pleasantview's sewer mains east of North County Road 350 West ("N CR 350 W") are vitrified clay pipe ("VCP"). West of N CR 350 W, Pleasantview's sewer mains are PVC pipe.[8] Both utility and customer owned sewer laterals are primarily VCP.[9] Typical VCP laying lengths are short at 2 feet, 4 feet, and 6 feet that lead to numerous sewer joints. These joints are entry points for clear water infiltration and root penetrations. VCP is normally no longer used for

[7] USGS stands for the United States Geological Survey. OUCC review of the 1972 USGS topographic map (based on 1971 imagery) showed approximately 40 homes had been built in the subdivision by 1971 along N CR 350 W, West Galaxy Drive, and West Harmony Parkway. Property Record Cards available through Fayette County's on-line GIS confirms homes in the northern part of the subdivision were built by 1971.

[8] *See* Attachment JTP-2 for Applicant's responses to Data Requests 5-1 through 5-9.

[9] Verbal communication from Utility President, Mr. Matt Sherck, at the November 21, 2024 site visit.

sewers in Indiana. Accordingly, replacement mains are PVC due to lower cost, ease of installation, longer laying lengths (14 feet and 20 feet), fewer joints and tighter sewers.

In discovery, Applicant reported manholes are four to five feet deep, constructed with shallow one-piece concrete bases that are topped with rows of brick to raise the manholes above grade. Some manholes are 20 feet deep.[10] Most manholes do not have cast iron frames and lids, but rather round concrete lids poured by the developer from leftover concrete.[11] These homemade lids do not fit flush against the bricks leaving gaps. The subdivision does not have storm sewers. During wet weather, since mains and manholes are in the right-of-way (usually in the ditch line), stormwater can enter manholes through gaps between the concrete lid and brick layer.[12]

Q: Does Applicant report collection system information in its Annual Reports?

A: No. Applicant does not provide the sewer data requested on the IURC form.[13] All entries for service connections and mains are left blank. In the Performance Measures, Applicant does indicate a total sewer length of 14,784 lineal feet ("LF") and the number

[10] *See* Attachment JTP-2 for Applicant's response to Data Request 5-2.

[11] Verbal communication from Utility President, Mr. Matt Sherck, at the November 21, 2024 site visit.

[12] Pleasantview Utilities submitted a Compliance Plan on May 23, 2007, to IDEM which acknowledged significant infiltration and inflow enter the sewers and under Project #6 proposed: a) sealing at least five known manholes with significant inflow, b) conducting televising and/or smoke testing to identify and prioritize significant problem areas, and c) make collection system repairs to address the identified problem areas. *See* Attachment JTP-3 for the Approved Compliance Plan, IDEM Agreed Order Case No. 2005-1 4957-W, June 4, 2007, provided as Attachment No. 6 to the OUCC Report, September 27, 2013, in Cause No. 43313-U.

[13] Requested Service Connection data (diameter, material type, average length and number of active connections (beginning, added, retired, and end of year) and information on inactive connections are to be provided on page S-6. Requested Collection Main data (diameter, material type, length (beginning, added, retired, and end of year) and how much added main was replacement pipe are to be provided on page S-7.

of manholes is 55.[14] The OUCC requested the current sewer asset inventory. Applicant made a general response but did not state the total sewer length by diameter and pipe type or the number of manholes in its sewer system.[15]

Q: What do you recommend regarding Applicant's reporting of sewer system information in its Annual Reports?

A: I recommend that the Commission order Applicant to fill in the sewer system information requested by the Commission in the Annual Reports.

Q: Should Applicant maintain an asset register for its sewer system?

A: Yes. I recommend the Commission order Applicant to start maintaining an asset register of its sewer system assets to record pertinent sewer information (e.g. diameter, pipe material, year installed, segment length, manhole numbers, sewer invert elevations) and costs for sewer main and manhole replacements / rehabilitations.

Q: Has Applicant been reporting that it has an Asset Management Plan for its collection system and wastewater treatment plant?

A: Yes. Each year on its IURC Annual Reports since 2008, Applicant has reported it has an Asset Management Plan ("AMP") and that it covers diagnostics, preventative maintenance, and rehabilitation/replacement, but not reactive maintenance.

Q: Does Applicant have an Asset Management Plan?

A: No. Through discovery, the OUCC twice requested a copy of the written Asset Management Plan. In response to DR 1-8, Applicant responded, "Report done by accountant, shoul [sic] be no." In response to DR 5-11, Applicant responded, "No

[14] The average manhole spacing is 273 LF calculated as 14,784 LF of sewers divided by 54 manholes (55 manholes minus 1) equals 273 LF per manhole. *See* Appendix A – Performance Measures to Applicant's 2020 to 2023 IURC Annual Reports. Note that Ethel Morgan of HomeTown Engineering, LLC reported in the September 30, 2013 Engineering Analysis that Applicant had 66 manholes instead of the 55 manholes reported currently. *See* Exhibit No. 8 in the OUCC's Report in Cause No. 44351-U for Engineering Analysis.

[15] *See* Attachment JTP-2 for Applicant's responses to Data Request 5-2.

additional plan to attach" and did not provide a copy.[16] Applicant's responses confirm it does not actually have an Asset Management Plan, certainly not one that it is following to maintain, rehabilitate, and replace its sewer and treatment assets. The poor condition of Applicant's collection system and WWTP as seen during the OUCC's site visit and as detailed in numerous IDEM Compliance Evaluation Inspections is consistent with Applicant's lack of an Asset Management Plan.

Q: What should Applicant include in an Asset Management Plan?

A: As a starting point, I recommend that Applicant follow the Asset Management Plan Guidance of the Indiana Finance Authority ("IFA").[17] The IFA defines an Asset Management Program, its purpose and objectives as follows:

> An Asset Management Program (AMP) is a document(s) developed by a Utility to assist in the long-term management of the assets necessary to support cost effective, proactive decisions including creation, acquisition, operation & maintenance (O&M), and replacement/ upgrade of Utility assets. Physical components deteriorate over time, resulting in increased O&M costs or capital reinvestment to maintain the level of service expected by the customers and stakeholders.
>
> AMPs are intended to ensure the long-term sustainability of a Utility and should be treated as "living documents" that are regularly referenced, revised, expanded, and implemented as an integral part of the operation and management of a Utility's system. They provide a structured framework of the asset information to help the Utility and stakeholders determine when it is most appropriate to repair, replace, or rehabilitate a particular asset as well as scheduling a long-term funding strategy to ensure sufficient funds will be available to implement the Utility's improvements as needed. The objective of an AMP is to achieve the lowest long-term cost of operation while continuously providing the desired level of service.[18]

[16] *Id.*, Applicant's responses to DR 5-11. *See also* Attachment JTP-4 for Applicant's response to DR 1-10.

[17] *See* https://www.in.gov/ifa/srf/applications-guidance-and-documents/ for Asset Management Program Guidance (July 2024) from the Indiana Finance Authority including Technical and Financial Section tables, an AMP checklist, AMP certification, and AMP Guidelines.

[18] *See* Attachment JTP-5 for Asset Management Program Guidance for the Indiana State Revolving Fund Loan Program, Indiana Finance Authority, July 2024, Introduction p. 2

Q: What should Applicant include in his Asset Management Plan?

A: Applicant should follow IFA's recommendation that Utilities develop and implement an AMP that includes the following minimum requirements:

1. System map
2. An inventory of all system assets
3. A condition assessment of all system assets
4. Development of an infrastructure inspection, repair, and maintenance plan, including a plan for funding such activities
5. An evaluation and implementation of water and energy conservation efforts
6. An analysis of the customer rates necessary to support the AMP
7. An Audit performed every two years
8. Cyber Vulnerability Assessment performed annually (may not be applicable)
9. Demonstration of the technical, managerial, legal and financial capability to operate and maintain the system, per the guidelines established by the IFA

Q: What do you recommend regarding preparation of an Asset Management Plan?

Q: I recommend that the Commission direct Applicant to complete an Asset Management Plan. As Applicant has claimed for over 16 years that it had an Asset Management Plan. Applicant should prepare the plan at no cost to ratepayers. Applicant should submit copies of the Final Asset Management Plan to the IURC and the OUCC within six months of the Final Order in this Cause.

Q: Does Applicant clean, televise, and inspect a portion of its sewer system annually?

A: Applicant's rates since 2014 have included a revenue requirement to clean, televise and smoke test all sewers. However, it appears Applicant does not have a regular

preventative maintenance program to clean, televise, and inspect its sewer system. Based on my review of recent contractor invoices, it appears cleaning and televising efforts by the Utility may primarily be reactionary in response to sewer blockages.

Nevertheless, in Annual Reports, Applicant claimed it cleaned exactly 1,500 LF of sewer each year from 2020 to 2023.[19] It appears the 1,500 LF values may have been entered by the Utility's Accountant as a carryover entry from prior years that does not reflect actual LF cleaned in later years. Similarly, Applicant reported inspecting exactly five manholes each year but could not document any manhole inspections.[20] Finally, in response to DR 5-4, Applicant claimed it televised 200 LF of sewer each year for 2020 to 2024. This is contradicted by Annual Reports to the IURC in which Applicant reported it performed no televising. Normal sewer televising and cleaning practices do not televise partial segments of sewers but rather televises entire sewer segments "manhole to manhole" which are typically spaced further than 200 LF.

Q: Who performs sewer cleaning and televising of the Pleasantview sewer system?

A: In response to discovery, Applicant reported the City of Connersville's crew provided sewer cleaning services 17 times (over an unspecified period) to clean 300 LF of sewers each time.[21] Since the cleaning period was not specified, I could not calculate annual sewer cleaning rates (LF per year, percentage of total main length). I checked recent cleaning and televising invoices obtained through the site audit and discovery. The invoices listed sewer rodding work of 300 LF to 380 LF per cleaning (length was not

[19] *See* Attachment JTP-6 for Applicant's reported sewer cleaning and televising metrics submitted in Appendix A – Performance Measures to Applicant's 2020 to 2023 IURC Annual Reports.
[20] *See* Appendix A – Performance Measures to Applicant's 2020 to 2023 IURC Annual Reports and Attachment JTP-2 for Applicant's responses to Data Request 5-3 regarding sewer cleaning and manhole inspections.
[21] *See* Attachment JTP-2 for Applicant's responses to Data Request 5-3 regarding sewer cleaning.

listed in two of the five invoices), but no invoices identified sewer locations for the work. [22, 23] One Connersville invoice and the Culy Contracting invoice did not state the number of feet of main cleaned, and neither invoice indicated the number of feet that had been televised. During the OUCC's November 21, 2024 site visit, Mr. Sherck noted the City of Connersville was no longer cleaning or televising Pleasantview's sewers.

Q: What sewer cleaning and televising costs were included in the revenue requirement granted in the last rate case?

A: In 2013 in Cause No. 44351-U, the OUCC accepted Applicant's $51,000 request to clean and televise ($45,000) and smoke test ($6,000) all sewers. Applicant's engineer, HomeTown Engineering, estimated these costs for Phase 1-Sewer Investigations as part of its Compliance Plan mandated through an IDEM enforcement action.[24] The OUCC amortized the estimated expenses over 10 years and 5 years respectively for an annual $5,700 revenue requirement that has continued for 11 years since 2014. In the present cause, Applicant has not made any expense adjustment to test year for maintenance expense for sewer cleaning, televising, and smoke testing.[25]

Q: What sewer cleaning and televising costs did Applicant incur during the test year and was it for the same program proposed under the Compliance Plan?

A: Applicant paid $5,738, but one 2023 invoice of $210 was for a 2022 cleaning. The Compliance Plan was to systematically clean, televise, and smoke test all sewers. The

[22] Section 34.1 – Location (of manholes) in *Recommended Standards for Wastewater Facilities*, Great Lakes Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers (known as Ten States Standards) requires manhole spacing not exceed 400 LF for sewers less than 15 inches in diameter.

[23] *See* Attachment JTP-7 for copies of four sewer cleaning or televising invoices from Connersville and one cleaning and televising invoice from Culy Contracting for work during the 2023 test year ending 12/31/2023.

[24] Agreed Order, Case No. 2005-14957-W, April 16, 2007.

[25] *See* Attachment JTP-8 for the discussion about sewer smoke testing, cleaning and televising in Cause No. 44351-U in 2013 (Final Order, March 26, 2014). The annual Maintenance Expense was increased by $12,528 to $13,700 for pond maintenance ($8,000), smoke testing ($1,200), and the cost to televise and clean 10% of utility's system ($4,500). 2012 test year expenses were $1,172.

2023 work appears to be for emergency sewer work, not for preventative maintenance.

Q: Has Applicant cleaned and televised its entire sewer system as it proposed in 2013?

A: The OUCC agreed to a revenue requirement to clean, televise, and smoke test all sewers but there is no record or other indication this work was completed. Such records would be invoices showing completed work and the dates the work was completed, a summary of results of sewer defects found, and televising tapes, among other work products. Typically, this work is detailed and summarized in a report. The cleaning, televising, and smoke testing effort would have identified and prioritized sewer defects for follow-up rehabilitation efforts.

Q: What do you conclude from your review of cleaning and televising invoices and Applicant's revenue requirement?

A: Applicant has not actually followed a routine program to proactively clean and televise its sewers as part of preventative maintenance. Rather, cleaning and televising appear to be reactionary corrective maintenance in response to sewer blockages or problems.

Q: What do you recommend for sewer cleaning, televising, and smoke testing?

A: I recommend the Commission require Applicant to institute a bona fide sewer cleaning and televising program with smoke testing as it had proposed over 10 years ago in Cause No. 44351-U and for which it has received a revenue requirement. The program should document sewer and manhole conditions, locate I&I sources, and prioritize removal of the I&I through replacement/rehabilitation of deteriorated sewers and manholes.

Q: Does Applicant maintain a sewer system map other than design plans?

A: No. In its Annual Reports to the IURC, Applicant states it does not have an overall

sewer system map.[26] In discovery, Applicant provided two illegible jpeg image files of sewer system drawings that were unreviewable for sewer information (diameter, length pipe type, manhole numbers, etc.) even when enlarged on the computer.[27] Applicant should have already completed a sewer system map. Under requirements of Section II, Paragraph 3 of the April 16, 2007 Agreed Order with IDEM in Case No. 2005-14957-W, Applicant was required to eliminate all sanitary sewer overflow points, implement mapping of sewers, conduct a flow study, and complete repairs to sewers.[28]

Q: Are utilities required to maintain current mapping of their sewer system?

A: Yes. Under Section 6 (d) of 170 IAC 8.5-2-6 - Information to applicants and customers, each sewage disposal company shall maintain up-to-date maps, plans, or records of its entire force main and collection systems, with such other information as may be necessary to enable the company to advise prospective customers, and others entitled to the information, as to the facilities available for serving any locality.

Q: What do you recommend regarding mapping of Applicant's sewer system?

A: Applicant should, at no cost to ratepayers, finally create an overall sewer system map and database to document sewer asset details and aid in repairs, replacements, and documentation of I&I removal efforts. These are important tools in managing and documenting Applicant's yet to be conducted program of routine sewer cleaning, televising, and sewer and manhole inspections, as well as tracking and resolving sewer defects, documenting sewer main break locations, sewer replacements, and removal of

[26] Pleasantview 2023 IURC Annual Reports, p. S-8.

[27] *See* Attachment JTP-2 for two sewer drawings that Applicant provided in response to DR 5-1.

[28] *See* Attachment JTP-3 for the Approved Compliance Plan, IDEM Agreed Order Case No. 2005-1 4957-W, June 4, 2007, provided as Attachment No. 6 to the OUCC Report, September 27, 2013, in Cause No. 43313-U.

I&I sources. I recommend that the Commission order Pleasantview Utilities to create and maintain a regularly updated overall sewer system map in accordance with the Indiana Administrative Code. This requirement should be at no cost to ratepayers.

Q: Has IDEM identified problems with Applicant's collection system?

A: Yes. Applicant has had excessive I&I problems for over 25 years. IDEM has issued numerous Compliance Evaluation Inspections and Inspection Summary/ Noncompliance Letters to Applicant since the late 1990s finding the collection system has severe or excessive infiltration and inflow ("I&I"). In a 2000 enforcement action, IDEM described the I&I problem as follows:

> Inspection reports for February 19, 1997, October 10, 1997, June 9, 1998, and February 10, 1999 indicated severe Infiltration Inflow (I/I) exists that causes frequent hydraulic overloads and bypassing at the headworks, where no comminutor nor screens exist.[29]

In a 2007 enforcement action, IDEM made a similar finding about excessive I&I:

> Infiltration/inflow (I/I) into sanitary sewers remains a problem, causing loss of biosolids to polishing ponds and bypassing of raw sewage during rain events.[30]

A sample of IDEM 2020, 2022, and 2024 Compliance Evaluation Inspections inspection reports (below) reveals the same findings about I&I:

1. <u>The facility continues to have excessive I/I in the collection system.</u> The flow at the WWTP was above 90% capacity for three months out of the 11 reviewed.
   Source: June 10, 2020 Inspection Summary/ Noncompliance Letter, p. 1.

2. The Collection System evaluation generated a marginal rating. <u>The facility continues to suffer the effects of I/I in the collection system.</u>
   Source: March 2, 2022 Compliance Evaluation Inspection, p. 2 of 5.

[29] Notice and Order of the Commissioner of the Department of Environmental Management, Cause No. B-2486, June 20, 2000. *See* Attachment JTP-9.
[30] Agreed Order, Case No. 2005-14957-W, April 16, 2007, p. 3

3. The Collection System evaluation generated an unsatisfactory rating.
   a. Part II. B. 2 of the permit prohibits overflows, pursuant to 327 IAC 5-2-8(11). A records review indicates an overflow occurred on 21 consecutive days during the last 12 months. This maintenance related overflow was eventually stopped and the line was repaired.
   b. The highly variable flow at the WWTP demonstrates an issue with I/I in the collection system. This is a violation of Part II. B. 1 of the permit which requires all facilities to be maintained in good working order at all times and operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. This includes the facility's collection system.

Source: May 2, 2024 Inspection Summary/ Noncompliance Letter, p. 1.

(All emphasis above added by the OUCC.)

Q: Has Applicant conducted sewer studies to determine the volume of excessive infiltration and inflow, locate I&I sources, and remove I&I sources?

A: No. Through discovery responses, Applicant indicated it has not conducted any sewer studies within the last five years.[31] I reviewed previous cases and could not locate any sewer studies, flow monitoring, smoke testing, or televising reports, sewer flow modeling or I&I source evaluations. In 2013 discovery in Cause No. 44351-U, Applicant reported it was planning to conduct smoke testing as part of repairs to the collection system after completing WWTP improvements and funds were available.[32] Prospective sewer studies including televising and smoke testing were also discussed in 2013 in the Design Summary for WWTP improvements prepared by HomeTown Engineering, LLC, Applicant's consultant, as part of a three phase strategy to eliminate NPDES violations through WWTP upgrades (Phase 1), collection system improvements to find and reduce I&I (Phase 2) and additional WWTP improvements

[31] *Id.*, Applicant's response to DR 5-6.

[32] Applicant's response to DR 1.8 in Cause No. 44351-U. *See* Attachment JTP-8 for the discussion about sewer smoke testing, cleaning and televising in Cause No. 44351-U in 2013.

(unspecified) if influent flows were not reduced (Phase 3):

> The utility plans to conduct smoke testing and sewer televising to identify collection system improvement needs which will be implemented in the second phase. Also, the utility plans to inspect customer connections to confirm presence or absence of sump pumps. If the influent wastewater flows are not reduced by the collection system improvements to be implemented in second phase, additional treatment plant improvements will be implemented in the third phase.[33]

In response to discovery asking Applicant to explain its plans to identify and remove excessive I&I sources if no sewer studies had been conducted, Applicant stated it would examine manholes and monitor lines whenever doing work on the system.[34]

Q: Applicant said it will examine manholes and monitor lines whenever working on the collection system. Is that adequate monitoring and maintenance of the system?

A: No. Applicant's approach should be proactive to prevent sewer problems rather than investigate the sewers after a problem has occurred. Applicant's response that it will examine manholes and monitor lines whenever doing work on the system is a misguided "after the fact" approach because it is always a reactive action taken to figure out what the sewer problem is and where it is located. It is not performed beforehand to detect and prevent sewer problems that disrupt service to customers (from blockages and sewer collapse), cause sanitary sewer overflows, or allow unabated excessive I&I to inundate the sewer system and WWTP. Applicant's response to DR 5-7 illustrates why this utility has a continuing and longstanding excessive I&I issue in the collection system that overwhelms the WWTP treatment capacity during wet weather and causes NPDES discharge violations and sludge issues.

[33] Design Summary, Construction Permit application for Pleasantview Utilities, Inc. Wastewater Treatment Plant Improvements, IDEM Permit Approval No. 20779, September 4, 2013. *See* Attachment JTP-10.
[34] *See* Attachment JTP-2 for Applicant's response to DR 5-7.

Q: Are sump pumps, downspouts, foundation drains, and area drains that contribute clear water illegally connected to Pleasantview's sewers?

A: In response to discovery, Applicant indicated it suspects sump pumps, downspouts, foundation drains, and area drains are connected to its system but it does not know any locations."[35] In its 2013 Construction Permit application, Applicant reported it planned to inspect customer connections to confirm presence or absence of sump pumps.[36] There is no indication that the utility performed any home inspections to locate and force removal of illegal clear water connections to the sewers. During the site visit, Mr. Sherck stated the total length of customer-owned VCP sewer laterals may exceed the Utility's sewer main length and these laterals can be significant clear water entry points due to poor conditions of the laterals caused by root penetrations at the joints.

III. COLLECTION SYSTEM FLOWS IMPOSED ON THE WWTP

A. Flow Characteristics

Q: Please characterize the raw sewage flows from the sewer system.

A: Applicant's collection system flows are highly variable with large peak flows during wet weather events due to I&I. It also appears some of Applicant's sewers may lose sewage under dry weather low-flow conditions through the same cracks and leaking joints in sewers, laterals, and manholes. This is termed "exfiltration," which is sewage *leaving* a sewer through cracks in the pipe, open, poorly sealed joints, or gaps between pipes, manholes, and laterals. It is the opposite of "infiltration," which is clearwater *entering* the sewer through the same sewer, manhole, and lateral defects. I tabulated

[35] *See* Attachment JTP-2 for Applicant's response to DR 5-8.

[36] Design Summary, Construction Permit application for Pleasantview Utilities, Inc. Wastewater Treatment Plant Improvements, IDEM Permit Approval No. 20779, September 4, 2013. *See* Attachment JTP-10.

Applicant's monthly treated effluent flow data reported to IDEM for years 2021 - 2023 and compared it to Applicant's reported water purchased and water sold data by month for those years. I then calculated the amount of I&I from the collection system, which I show graphically in Figure 1 and tabulated in OUCC Attachment JTP-11.

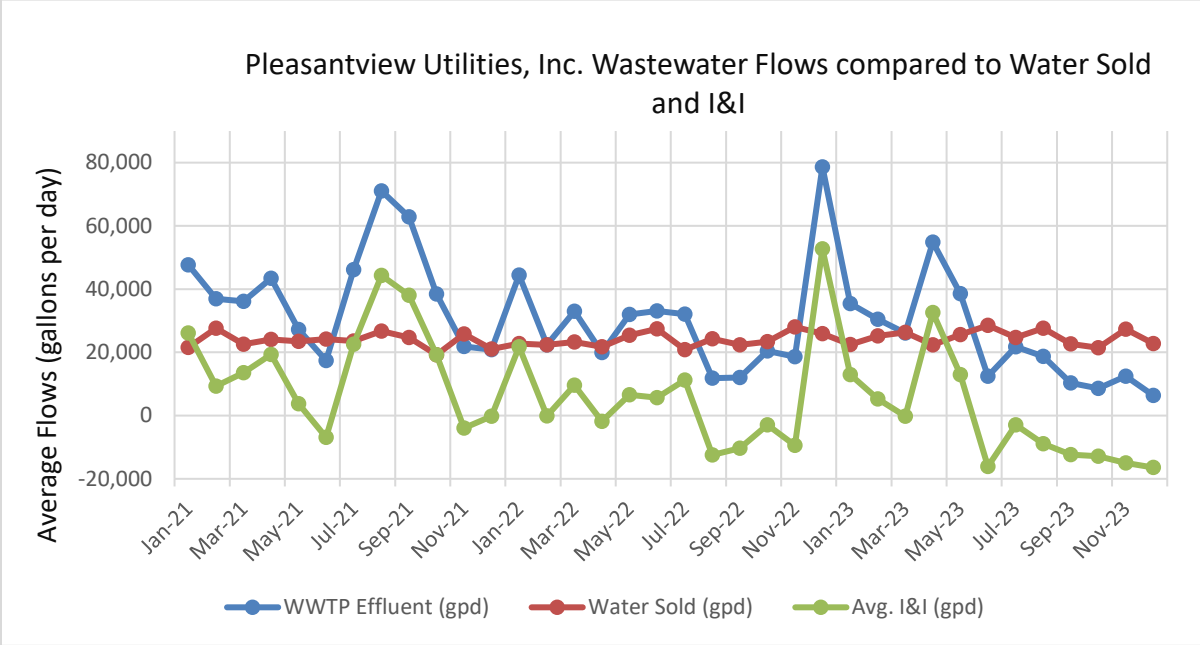


Figure 1 – Wastewater Flows compared to Water Sold, and I&I (gallons per day)

Q: Do wastewater flows exceed WWTP capacity?

A: Yes. WWTP capacity is 60,000 gpd but flows regularly exceed this capacity during wet weather events.[37] In Cause No. 44351-U in 2013, Applicant's engineer reported a peak day flow of 325,000 gpd which is over five times the plant's 60,000 gpd rated capacity.[38] More recent data in the last four years still shows high peak flows up to 277,000 gpd. Table 1 shows my tabulation of 2021 to 2024 flow metrics from data

[37] NPDES Permit No. IN0044776, May 26, 2021, p. 2 of 32.

[38] *See* Attachment JTP-8 for Pleasantview Utilities, Cause No. 44351-U, Engineering Analysis, HomeTown Engineering, LLC, September 30, 2013, p. 15 of 18.

Applicant submitted to IDEM in its MROs.

Table 1 – Summary of Reported WWTP Effluent Flows 2021-2024

Flow Parameters	Year			
	2021	**2022**	**2023**	**2024**[39]
Total WWTP Treated Flow (MG/Year)	14.311	8.954	8.378	7.882
Average Daily Flow (gpd)	39,208	29,356	22,954	32,571
Maximum Daily Flow (gpd)	99,000	240,000	166,000	277,000
Minimum Daily Flow (gpd)	9,000	4,000	500	100

B. OUCC Estimated Infiltration and Inflow

Q: Does Applicant have an estimate of how much I&I enters its sewer system?

A: Given the lack of an Asset Management Plan, errors in Applicant's reported effluent flows discussed previously, and the apparent absence of sewer studies or proposed sewer replacement / rehabilitation projects, it is unlikely Applicant has prepared I&I flow estimates. I have not seen any estimates in my review of previous rate cases and IDEM documents.

Q: What percentage of Applicant's WWTP effluent flow do you estimate is due to I&I?

A: I calculate that I&I is approximately half of Applicant's effluent flow.

Q: How did you calculate the estimated I&I flows?

A: To get an idea of the amount of I&I that may be entering Applicant's sewer system, I calculated I&I by subtracting reported monthly water sold volumes from reported wastewater effluent flows. The simplifying assumption is that households discharge all water sold as sanitary sewage to the sewer system.[40] Water sold is the maximum

[39] Flow data shown for 2024 is through August 31, 2024.

[40] Some water sold ends up in stormwater runoff or groundwater such as water to wash cars and for outside irrigation of gardens, lawns, shrubs, and trees.

sewage volume that is possible without clearwater. In my calculations I excluded 17 months (of the 36 months) when water sold exceeded effluent flows.[41]

Q: Please summarize the findings from your analysis of I&I based on wastewater flows and water sold volumes.

A: Water sold data shows total usage between 19,000 to 28,500 gallons per day ("gpd") based on monthly averages. Unlike the widely varying wastewater effluent flows, there are no order of magnitude fluctuations in reported water sold (or water purchased). Monthly average water usage is low at only 45.6 gallons per capita per day ("gpcd").[42] This flow is below reported normal U.S. usage of 80 to 100 gpcd.[43]

Applicant reports effluent flows to IDEM but not influent flows entering the WWTP. Incoming flow is equalized to some degree through the WWTP tanks and two polishing ponds. Reported wastewater effluent exhibits over a ten-fold variation in flows from as low as 6,345 gpd up to 78,645 gpd. Per capita effluent flows for 2021 to 2023 ranged from 11.9 gpcd to 149.2 gpcd even though water sold averaged only 45.6 gpcd. The low effluent flow of 6,435 gpd in December 2023 is only 28% of the water usage and far below the 22,744 gpd average water sold in that same month. On eleven days in December 2023, Applicant reported effluent flows of only 500 to 600 gpd or about 1.0 gpcd. This is not a believable flow and a definite red flag. Both the certified operator and Utility owner should have recognized these non-plausible flows and taken steps to determine what caused them. Effluent flows were even lower in January and

[41] *See* Attachment JTP-11 for Pleasantview I&I Analysis – Months with Negative I&I Excluded.
[42] Average water usage ranges between 40 to 54 gpcd calculated as the monthly water sold divided by customers (2021-199 customers, 2022 – 201 customers, and 2023 – 203 customers) divided by US Census data of 2.62 people per housing unit.
[43] In 2015, each American used an average of 82 gpd at home (USGS, Estimated Use of Water in the US in 2015).

February 2024, going down as low as 100 gpd or less than 0.2 gpcd.

Q: What might account for the low effluent flows reported by Applicant?

A: Because- lawn irrigation does not occur in December, January or February and water sold volumes were within normal usage, wastewater volumes that are so significantly below water sold volumes can be caused by four main reasons:

1. Sanitary Sewer Overflows ("SSOs") The collection system could be overflowing via SSOs typically at manholes before reaching the WWTP (such as caused by a sewer collapse or blockage). However, the likelihood a sustained SSO could occur over several months without detection has a very low probability.[44] Therefore, this reason was discarded.
2. Erroneous meter readings The WWTP effluent meter could read low in error if meter software was programmed wrong. The ultrasonic flow meter is a simple meter that measures the level of effluent flow through a Palmer Bowlus flume and converts it to flow. IDEM requires annual calibration.
3. WWTP bypassing Sewage reaching the WWTP could be bypassed to the receiving stream before the meter. Under NPDES permits, bypasses are illegal unless Utility requested and IDEM pre-approved. Bypassing the flow meter has occurred at Applicant's WWTP. Most recently, IDEM documented improper bypassing in its April 29, 2024, Inspection as follows:

[44] Applicant reported one sustained sanitary sewer overflow from a manhole on N CR 350 E lasting 21 days from November 30, 2023, to December 20, 2023 that was caused by a blockage and sewer collapse that was initially undetected by Applicant. *See* Attachment JTP-2 for Applicant's response to DR 5-9.

> At the time of the inspection, the discharge pipe from the polishing pond had been modified. This modification caused flow to be released through the old outfall. This flow was bypassing disinfection and post aeration as well as flow measurement.[45]

Bypassing before the meter, since it underreports flows used in calculating the mass loadings (lbs./day), improperly reduces the number of effluent violations for weekly and monthly average mass limits for parameters such as ammonia.[46]

4. Sewage exfiltration into groundwater in the collection system or at the WWTP The Pleasantview subdivision has some rolling terrain with better drainage. During dry weather, exfiltration could occur in these areas as sewage leaks through sewer defects and enters the groundwater. Exfiltration could also occur through aboveground and below ground holes and cracks in the corroded steel package plant and percolation through the polishing ponds bottoms.

Q: Are the 203 customer water meters a factor in the low effluent flows, and do they adversely alter the I&I flow estimate?

A: No. Customer meters are part of Applicant's water operations. They are separate from wastewater operations where treated flows are measured through one effluent meter. As part of efforts to estimate I&I in the wastewater collection system, I estimate the average age of Applicant's manual read meters assuming the oldest meters were replaced first. My analysis shows average meter age is 8 years as shown in Attachment JTP-12 which is within the acceptable range of meter service lives for acceptable data. Applicant replaced half of its meters (107 meters) in 2013 and 2014. I graphically show Applicant's meter replacements in Figure 2 below.

[45] IDEM Compliance Evaluation Inspection, April 29, 2024.

[46] Weekly and monthly average mass discharge quantities or loadings are calculated as the pollutant concentration (mg/L) times the effluent flow (MGD) times 8.34 to yield pounds per day.

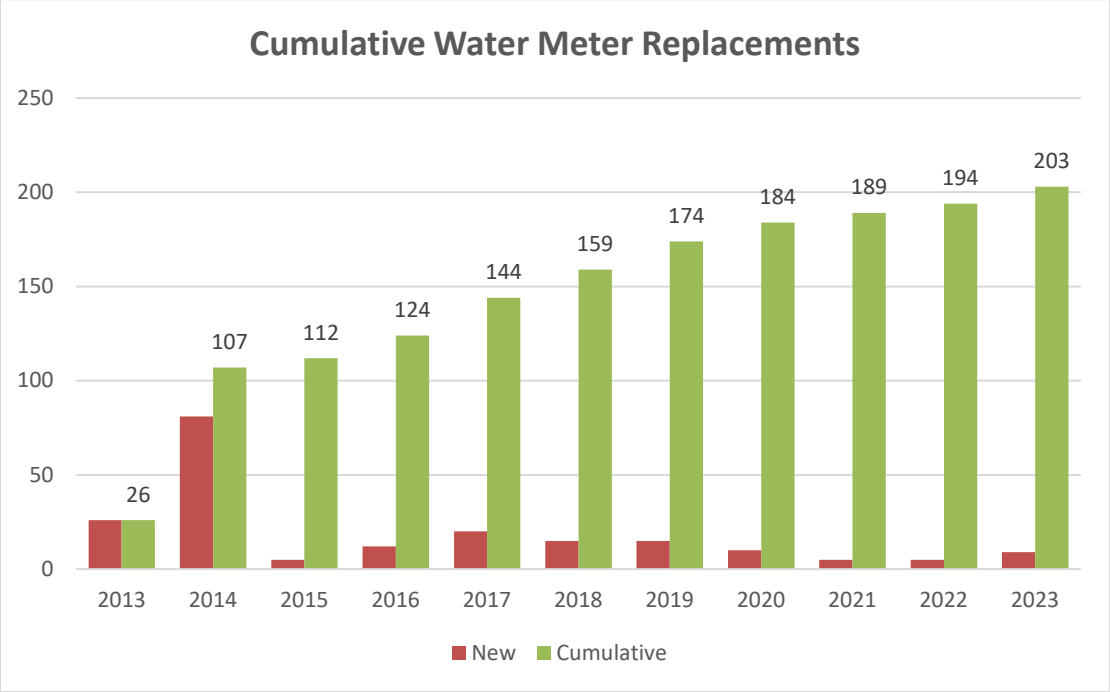


Figure 2 – Water Meter replacements from 2013 to 2023.

IV. WASTEWATER TREATMENT PLANT

Q: Please describe Applicant's wastewater treatment plant ("WWTP").

A: Since start-up, Pleasantview Utilities has had two steel package plants for wastewater treatment located at 3812 West Galaxy Drive in the Pleasantview subdivision. The original WWTP was a 0.0167 million gallons per day ("MGD") package plant installed before the first homes were constructed in the early 1970s. It was an extended aeration plant of limited hydraulic capacity followed by tertiary lagoons (polishing ponds) with effluent chlorination.[47] The original package plant was abandoned before 2012 and demolished as part of the WWTP improvements under the 2013 Construction Permit.[48]

[47] The original package plant, at a rated capacity of 16,700 gpd, was sufficient for 56 housing units consisting of 50 homes at 310 gpd and 6 apartments at 200 gpd each.

[48] IDEM issued Construction Permit No. 20779 on September 4, 2013 for wastewater improvements arising out of an IDEM enforcement action. *See* Attachment JTP-10.

The second wastewater treatment plant, currently still in use, was constructed 50 years ago in 1974 and is also an extended aeration steel package plant originally rated to treat 50,000 gallons per day.[49] The 1974 package plant included a small surge tank (7,000 gallons), a small aerated sludge digestion tank (8,000 gallons), two parallel aeration basins (each at 30,000 gallons, 60,000 gallons total volume), two clarifiers (10,000 gallons) with air lift pumped return activated sludge ("RAS") lines back to the aeration basins, and two blowers. It was described in the 2012 NPDES Permit:

> The permittee operates a Class I, 0.0667 MGD wastewater treatment plant which consists of two parallel extended aeration wastewater treatment plants (roughly 0.05 MGD and 0.0167) with 2 polishing ponds, secondary clarification, effluent chlorination via chlorine tablets, and effluent flow metering which only measures the flow from the larger extended aeration plant. The effluent flow from the two treatment plants recombine before entering the first of 2 polishing ponds.

Q: Why did Applicant propose making WWTP improvements in 2013?

A: The reasons for the proposed improvements were described in the Construction Permit.

> Description of Present Situation: The utility currently operates a Class I treatment facility consisting of two parallel extended aeration package plants (a 0.06 MGD plant and a 0.0167 MGD plant) followed by two polishing ponds and effluent flow monitoring. The effluent flow from two package treatment plants was designed to recombine before entering the first polishing pond. The 0.0167 MGD package plant is not functional and is currently abandoned. The surge tank and aerobic digester in the 0.06 MGD package plant are being used as aeration tanks. The treatment facility has been experiencing significant compliance issues such as wet weather caused effluent violations, bypassing and overflows for a very long time. Also, the treatment facility does not have a chlorine contact tank. There is an outstanding Agreed Order No. 2005 -14957 -W.[50]
>
> (Emphasis added.)

[49] The 50,000 gpd rating for the 1974 Package Plant was listed in the 1985, 2002, 2007, and 2012 NPDES Permits which indicated total WWTP capacity is 0.0667 MGD that included 0.0167 MGD for the original Package Plant.
[50] *See* Attachment JTP-10 for the Design Summary in IDEM Construction Permit No. 20779, Sept. 4, 2013.

Q: Were all these proposed improvements installed?

A: No. Applicant never constructed the new 30,698-gallon surge /flow equalization tank which accounted for $50,000 of the $127,500 cost of improvements and installed the generator and telemetry/SCADA system late. The IURC subsequently forced Applicant to reduce rates and refund 196 customers $187.76 for the work not completed for a total refund of $36,801.89. [51]

Q: Was the surge/ flow equalization tank an important component for improved handling of peak wet weather flows?

A: Yes. Applicant's engineer recognized collection system I&I overwhelms the WWTP capacity but noted the surge / flow equalization tank would provide some relief by allowing up to 90,000 gallons of peak wet weather flow to be processed. This was described in the Construction Permit:

> Note - The proposed surge /flow equalization tank is to equalize excessive wet weather flows to the package treatment plant in order to provide for some relief and to achieve compliance during certain wet weather days. The plant may not achieve compliance with the NPDES permit limits during higher peak wet weather flows until issues within the collection system have been resolved and infiltration /inflow sources have been removed /reduced. The goal will be to minimize influent wastewater flows to the plant to the extent that the surge /flow equalization tank can help the plant achieve compliance with the NPDES permit limits.[52]

Q: Have you viewed Applicant's WWTP and collection system?

A: Yes. With the OUCC's Scott Bell and Carl Seals and IDEM Inspector, Becky Ruark, on November 21, 2024 I toured the extended aeration WWTP package plant, polishing ponds, chlorine contact tank, effluent flow meter, outfall, onsite shed with the SCADA

[51] Cause No. 44351-U, Wastewater Utility Phase II Rate Reduction and Refund letter from the IURC to Applicant, January 13, 2020.

[52] *See* Attachment JTP-10 for IDEM Construction Permit No. 20779, September 4, 2013, p. 61 of 65.

system that monitors for high water levels in the package plant, and the emergency generator. The tour was led by Pleasantview's President, Mr. Matt Sherck. The current certified operator, Mr. Michael Stuckey, was not present.

Q: What is the condition of the WWTP?

A: The WWTP is in very poor condition. Despite improvements made in 2013 – 2015, the condition of the wastewater plant has been allowed to continue to deteriorate for many years. In a June 5, 2020 Inspection, IDEM noted the plants deteriorating condition due to age. In a March 2, 2022 Inspection and again in a April 29, 2024 Inspection, IDEM rated the Facility/Site as unsatisfactory stating:

> The WWTP is in poor condition with corrosion obvious in several areas. This is a violation of 327 IAC 5-22-10 which requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant. Specifically, if the permittee plans to continue to operate this WWTP they must put a plan in place for replacement of the equipment.[53]
>
> (Emphasis added.)

I provide site visit photos in Attachment JTP-13 showing the deteriorated conditions. Steel corrosion and rust are evident on above grade walls with holes through the steel and on the blower cabinets and emergency generator. These holes allow aeration basin liquids to escape the treatment basins during high flow conditions when tank water levels rise.[54] A notch has been cut out of the north aeration basin walls apparently to relieve high flows by bypassing treatment and overflowing onto the ground to the

[53] *See* Attachment JTP-1 for IDEM's March 4, 2022 Inspection Summary/ Noncompliance Letter, p. 14.

[54] The wastewater in the aeration basins is known as mixed liquor and has typical suspended solids concentrations of 1,500 mg/l to 3,500 mg/L compared to raw wastewater suspended solids levels of below 200 mg/l.

polishing ponds. Steel grating between the aeration basins and over the clarifiers that provide access to return activated sludge ("RAS") piping, scum lines, and aeration headers from the blowers appears to be off center and supported on sagging rusty beams. Applicant has also replaced the original aeration headers that were under the center walkway gratings between the two aeration basins with an aeration header that is now above the gratings. This is a tripping hazard. The tripping hazard and poor condition of the steel and grating supports are operator safety issues. If I was the operator, I would refuse to walk out onto the gratings. Also, the northwest wall of the aerated sludge holding tank is bowed in and may eventually collapse. Further, abandoned piping has been left in place.

Q: How were the steel tanks originally protected against corrosion?

A: The tanks were factory painted with black Aer-O-Flow Standard paint and equipped with eight buried 17 lb. magnesium sacrificial anodes electrically connected to the steel tank walls that preferentially corrode instead of the steel walls.[55] Before being completely consumed, these magnesium anodes needed to be dug up periodically, checked and replaced if needed.

Q: Has Applicant maintained the corrosion protection systems for the package plant?

A: No. At the site visit, when I mentioned to Mr. Sherck the tanks were equipped with magnesium anodes and that they needed to be regularly replaced to prevent corrosion to the steel, he seemed surprised to learn that they were part of the package plant. It also appears that the tank walls have not been repainted. Unlike concrete walled

[55] *See* Attachment JTP-10 for the manufacturer's product information for the package plant. The magnesium anode, part of the cathodic protection system (in conjunction with the protective paint coating), has a more negative electrochemical potential than the steel metal of the tank that it is protecting (the cathode). The difference in potential between the two metals means the sacrificial anode material corrodes in preference to the structure

WWTPs, steel package plants corrode over time especially those that are buried because they "are out of sight and out of mind" and the exterior walls and tank bottom cannot be inspected. Due to the package plant's poor condition and high wet weather flows, it appears Applicant has not and may not be able to take the aeration basins down for cleaning, inspecting, and painting for corrosion control.

Q: Does an inability to take tanks offline for cleaning, inspecting, and routine maintenance cause other problems?

A: Yes. It is likely that over many years, heavier solids have accumulated on the bottom of the extended aeration basins that hinder effective wastewater treatment. This is because the package plant does not have grit removal facilities or primary clarifiers before the aeration basins which are common process units at larger treatment plants. The grit and heavier solids reduce capacity by occupying treatment volume, hinder oxygen transfer from the aeration system due to plugging or covering the diffusers, and contribute to effluent violations, especially ammonia.

Q: Has the operator noted problems with the aeration system's diffusers, blowers, and oxygen levels?

A: Yes. Low dissolved oxygen, diffuser issues, and tank mixing issues have all been noted by the operator. There also have been periods when no blowers or only one blower were on-line. The previous certified operator, Mr. Leslie Day, provided comments on the monthly Discharge Monitoring Reports ("DMRs") to IDEM until his replacement in June 2024 by the current operator, Michael Stuckey. The most telling comment is that the air supplied to the aeration basins is "focused in one area, and not evenly distributed across the aeration tank." If air is not evenly distributed, more solids will be deposited in areas of limited aeration, and the solids problem will worsen. Recent DMR

comments on effluent violations identify operational problems and the need for repairs and upgrades:

> Ammonia over limits. The aeration system is inadequate this has caused the ammonia violations. (July 2023)
>
> I suspect the cause of the ammonia and DO issues to be the aeration system. It seems all of the air is focused in one area, and not evenly distributed across the aeration tank, it could be the header pipe or the diffusers. The owner is aware of the issue. (August 2023)
>
> The aeration/diffusers in the mixed liquor tank need to be repaired, it seems that the air is confined to the area of the tank where the header enters it. (September 2023)
>
> Air system needs to be upgraded. Air seems to be confined to one area of the aeration tank. (November 2023)
>
> We continue to have issues with high ammonia readings. We have indicated to the owner the need to update the aeration system with fine bubble air diffusers, this will provide better air transfer in the MLSS. The new fine bubble diffusers should be installed within the next couple of months. (December 2023)
>
> The final ammonia issues are a result of improper mixing in the aeration cell. Update = Several new fine bubble diffusers were installed on 2/24/2024. This will help with better mixing and air transfer. (January 2024)
>
> The ongoing issue with the diffusers has been the reason for the ammonia violations. there were several new fine bubble air diffusers installed recently, the depth of the diffusers is questionable. (March 2024)
>
> E. Coli was due to low residual. Ammonia is due to low D.O. Chlorine was low due high flow (April 2024)
>
> Plant upset (May 2024)
>
> Plant upset (June 2024) – new operator begins, Michael Stuckey
>
> Plant upset (July 2024)
>
> Plant upset (August 2024)

Q: Why do you believe solids deposits in the aeration basin are likely to be contributing to effluent violations?

A: Absent grit removal or primary clarifiers to remove heavier solids before the aeration basins, aeration basins *become* the grit removal tank. Periodically, each aeration basin

must be taken offline and cleaned to remove heavy solids that hinder treatment. At Indianapolis' Belmont WWTP, two long pre-aeration tanks collected heavier grit particles (sand, dirt, eggshells, coffee grounds, seeds, etc.) before the primary clarifiers where they would have caused more wear on sludge collecting mechanisms. During periodic pre-aeration tank cleanouts, extensive accumulated grit deposits were removed. It is the same situation at Applicant's WWTP with built up solids deposits, albeit at a smaller scale. For aged sewers experiencing excessive I&I, backfill along mains enters sewers from collapses and through gaps and cracks in mains and laterals.

Q: Is the operator responsible for cleaning deposited solids from the aeration basins?

A: For small systems, typically no. The certified operator mainly collects and tests samples for NPDES permit compliance and reporting purposes, checks on plant operations, and troubleshoots problems. Pleasantview's operators have been on-site for only 1.5 hours per week.[56] Because removing solids from the basins is involved (requires taking tanks offline) and does not occur every year, the Owner should coordinate the cleaning.

Q: What do you recommend regarding tank cleaning?

A: Tank cleaning should be done as part of routine maintenance. Applicant should develop a plan to accomplish cleaning and inspecting all tanks and clarifiers in the steel package plant as part of efforts to correct the aeration system issues that the operator reports is causing the effluent violations. I also recommend a structural engineer inspect the steel tanks when they are offline for cleaning and make recommendations on whether the package plant has reached the end of its useful life and should be removed from service.

[56] IDEM requires utilities with WWTP capacities below 1 MGD, to report man-hours spent on-site at the plant. From January 2022 to August 2024 (139 weeks or 973 days) Applicant reported 205 man-hours were spent at the WWTP. This equates to 1.5 hours on-site per week.

Q: Please summarize the problems with Applicant's wastewater system.

A: Based on my limited review, I have identified the following six main issues:

1. High wastewater flows are the number one problem.
    a. Reported flows up to 325,000 gpd have been caused by excessive I&I from the aging collection system.
    b. WWTP treatment capacity is 60,000 gpd.
    c. 2013 Improvements were to have included a 30,698-gallon surge / flow equalization tank. However, the proposed tank was never built.
2. Bypass of treatment during wet weather
    a. Bypasses are prohibited and a violation of the NPDES permit.
    b. Untreated sewage overflowing the treatment tanks flows over the ground to the polishing ponds from holes and a notch cut in the WWTP steel walls.
3. Solids washout from the aeration basins
    a. During high flows solids leave the aeration basins and clarifiers and flow from the clarifiers to the polishing ponds or onto the ground and to the polishing ponds.
    b. Loss of biomass from the aeration basins
    c. Loss of treatment, especially for ammonia removal (nitrification)
4. Lack of aeration and adequate tank mixing
    a. Low dissolved oxygen levels in the aeration basins disrupt ammonia removal.
    b. Effluent violations for ammonia occur
    c. Tank contents are not well mixed allowing heavier solids to settle.
5. Corrosion of the steel package plant
    a. Tanks have not been cleaned and inspected.
    b. It may not be possible to take the tanks offline.
    c. Tanks have not been repainted.
    d. The magnesium sacrificial anodes have not been checked or replaced.
    e. The 1974 steel package plant is at or near the end of its service life.

6. Applicant has not proposed a plan to replace the WWTP and sewer mains that have reached the end of their service lives.
   a. No asset list for the collection system
   b. No Asset Management Plan

V. NEED FOR ASSESSMENT OF FUTURE OPTIONS FOR COLLECTION AND TREATMENT

Q: Given Applicant's deteriorated collection system and treatment plant problems, should options be assessed for future provision of wastewater services?

A: Yes. Due to excessive I&I, sewage flow from Applicant's aged sewers exceeds the capacity of its' deteriorated WWTP package plant. The high I&I flow problems and poor conditions of the sewers and WWTP are well documented. Operations and discharge violations are also well documented. The existing 50-year-old WWTP is undersized for sewage flows it has been receiving, has been poorly maintained, and is at or near the end of its service life.

Q: Has IDEM directed Pleasantview to develop Compliance Plans that included evaluation of WWTP options?

A: Yes. Through IDEM Enforcement Actions, the NPDES permit, Compliance Evaluation Inspections, and Inspection Summary/ Noncompliance Letters, going back to 1997 multiple times DEM has mandated Applicant develop and implement Compliance Plans to bring the wastewater facilities into compliance with its NPDES permit or connect to a nearby Connersville publicly owned treatment works.

Q: When was Applicant first directed by IDEM about the need to connect to a nearby wastewater system?

A: IDEM included a Regionalization Requirement in the 1997 NPDES Permit renewal:

> E. REGIONALIZATION REQUIREMENTS
>
> In accordance with 327 IAC 5-10-7(c), the facility is required to connect to a public sewerage system, discontinue the direct discharge under the current

> NPDES permit and abandon their wastewater treatment plant if a public sewerage system becomes available at any time within a reasonable distance from the facility. The intent of this provision is to encourage the entities mentioned in this permit to compare the cost of connecting to a sewerage system against the cost to build or upgrade and operate a sewage treatment plant.[57]
>
> (Emphasis added.)

Under 327 IAC 5-10-7 (c), reasonable distance is defined as "related to cost" and the regulation, passed in 1993, is to encourage comparison of the cost of connecting to a sewerage system against the cost to build, upgrade and operate a WWTP. [58]

Q: Did IDEM require Compliance Plans in another NPDES renewal?

A: Yes. IDEM again required a Compliance Plan when renewing the 2002 NPDES Permit:

> D. COMPLIANCE PLAN REQUIREMENT
>
> The permittee shall submit a compliance plan to the Compliance Evaluation Section, Office of Water Quality by no later than three (3) months from the effective date of the permit, to address how the permittee plans to attain the effluent limitations and other conditions of his permit. The compliance plan shall include, among other items, a description of the method selected for meeting the requirements of this permit. An evaluation of the feasibility of connecting to another collection system must also be performed as a part of the plan. The permittee shall comply with all permit requirements as soon as possible.
>
> (Emphasis added.)

Q: Has Applicant previously proposed connecting to Connersville's system?

A: Yes. In Cause No. 42202-U, the OUCC described Applicant's funding request for the Connersville connection, which was estimated to cost $365,000.

> Because of severe deficiencies of the existing wastewater treatment plant as expressed by the Indiana Department of Environmental Management (IDEM) in recent reports and an IDEM Commissioner order, the Petitioner desired funding that would allow it to interconnect with the City of Connersville for sewer service. The proposed increase was in large part due to the desire for revenue that would allow Petitioner to initiate the project.[59]

[57] NPDES Permit Renewal, May 30, 1997

[58] *See* Attachment JTP-14 for regulation 327 IAC 5-10-7 Connection and Regionalization

[59] Report of the Indiana Office of Utility Consumer Counselor, Cause No. 42202-U, July 31, 2002, p. 4

The OUCC recommended approval of a portion of the funding request to mitigate Pleasantview's compliance problems:

> Petitioner must resolve the issues addressed in the IDEM Commissioner's Order. If Petitioner proceeds with the proposed project (interconnection with Connersville) the existing treatment plant will no longer be necessary. Therefore, the source of many of its IDEM compliance problems will be eliminated.[60]

Q: Was Pleasantview's funding request, as recommended by the OUCC, approved by the Commission?

A: Yes. The Commission described Applicant's request in 2002 as follows:

> Petitioner explained it is requesting an increase in sewer rates in order to fund a sewer expansion to connect to the City of Connersville's sewage system. Petitioner explained to its customers that the expansion is necessary to meet IDEM requirements, and that interconnection with the City of Connersville, which will treat all of Petitioner's sewage, is cheaper than constructing a new sewage treatment plant. To accomplish this interconnection, Petitioner is requesting authority to collect additional revenue that would be set aside in a special construction fund for a period of three years. After three years, Petitioner believes the fund would be sufficient to allow Petitioner to make a 20% down payment on the $365,000 proposed system expansion.[61]

The ordering paragraphs authorized Pleasantview to issue long-term debt and increase its rates after the connection to Connersville had been completed:

> 4. Petitioner shall be and hereby is authorized to issue long-term debt in an amount not to exceed $305,000 and at an interest rate not to exceed 8% for purposes of financing the interconnection with the City of Connersville.
>
> 5. After the interconnection with the City of Connersville is built and in service, Petitioner shall be permitted to place into effect a Phase II rate of $40.75, subject to the true-up described in Finding Paragraph No. 9. Petitioner shall file a new tariff with the Gas/Water/Sewer Division setting forth the Phase II rates and charges, which shall take effect on and after the date of that Division's approval.[62]

[60] Report of the Indiana Office of Utility Consumer Counselor, Cause No. 42202-U, July 31, 2002, p. 7

[61] Final Order, Cause No. 42202-U, September 25, 2002, p. 2

[62] Final Order, Cause No. 42202-U, September 25, 2002, p. 6

Q: Did Applicant construct the lift station and force main to Connersville as it proposed in Cause No. 42202 in 2002 and as supported by the OUCC and approved by the Commission?

A: No. In the Applicant's next rate case in 2008, the Commission summarized the testimony explaining why Applicant did not connect to Connersville's system.

> The Commission approved the OUCC's proposed two-phase approach in its Order in Cause No. 42202-U on September 25, 2002. However, since the issuance of the Commission's Order, Pleasantview has not obtained the approved financing or built the interconnection to the Connersville plant. The OUCC's report in this Cause indicates the interconnection project was never implemented because of Connersville's concern with the severe inflow and infiltration rate of storm water into Pleasantview's collection system, which the utility has yet to address. Consequently, the Phase II rate has never been implemented.[63]

Q: Did IDEM require that Applicant prepare a Compliance Plan as part of an Agreed Order arising from enforcement?

A: Yes. In Agreed Order, Case No. 2005-14957, IDEM required Applicant to develop and submit a "Compliance Plan" which was to identify actions that Respondent would take to achieve and maintain compliance with its NPDES Permit. The Compliance Plan was "to specifically include the actions the Respondent would take to upgrade, expand, and/or replace wastewater treatment plant, or alternatively, connect to the Connersville publicly owned treatment works.[64]

Q: Has the US EPA also directed Applicant to develop and evaluate WWTP options?

A: Yes. Under the Compliance Program Section in the 2022 Administrative Order on Consent, the EPA directed Applicant to complete and submit an Engineering Evaluation by a licensed professional engineer with expertise in wastewater

[63] Final Order, Cause No. 43313-U, April 23, 2008, pp. 2-3

[64] Adoption of Agreed Order, Case No. 2005-14957, April 16, 2007, p. 6

treatment.[65] The Evaluation was to have been submitted within 90 days of the January 28, 2022 Effective Date of the US EPA's Administrative Order on Consent. The Engineering Evaluation was to have been certified and include the following actions:

a. Identify the causes of the narrative and numeric effluent limit violations cited above;[66]

b. Describe the current treatment operations, including detailed diagrams that depict flows to and through the Facility;

c. Identify existing treatment components, and for each component, determine its adequacy, capacity, age, current condition, and treatment capability, including removal efficiency;

d. Evaluate adequacy of treatment equipment and operations and determine needs. The determination of equipment needs shall encompass equipment repair, replacement, and addition; and

e. Evaluate alternatives to on-site wastewater treatment, such as conveying wastewater to a nearby municipal wastewater treatment plant.

Q: Did Applicant submit the required Engineering Evaluation to the US EPA?

A: That is unclear. The OUCC could not find any documents that Applicant submitted the required evaluation to EPA. Applicant provided the following response to DR 1-10:

> **Q-1-10:** According to page S-8 of Applicant's 2023 IURC Annual Report, Applicant schedules and conducts periodic condition assessments of its assets. Please state when the most recent condition assessment was conducted for the wastewater utility and provide the results of that assessment.
>
> **Response:**
> Assessment done this summer shows system is in need of upgrades and maintenance, upgrades done to aeration and sludge system. Long term need replaced or other option pump to Connersville treatment plant. Evaluation by engineer working on upgrade to permit. No written report. Additional assessment done in 2022 and attached.

[65] *See* Attachment JTP-15 for the Final Administrative Order on Consent Under Section 309(a) of the Clean Water Act, 33 U.S.C. § 1319(a), January 28, 2022, pp. 4-5.

[66] *See* Item Nos. 19 to 27 in the US EPA Administrative Order on Consent provided in Attachment JTP-15.

Q: What was the additional assessment done in 2022 referred to by Applicant?

A: The additional assessment[67] was an undated letter report discussing three options for Pleasantview's WWTP:

1. Abandon the existing WWTP and connect to the Connersville sewer system.
2. Abandon the existing treatment facility and install a new Sequencing Batch Reactor (SBR) plant.
3. Retain the existing WWTP and upgrade it and the collection system.

Q: Was the 2022 Assessment prepared by a licensed professional engineer with expertise in wastewater treatment as ordered by the EPA?

A: No. It was prepared by Applicant's previous certified operator, Mr. Leslie Day of D&S Water and Wastewater Services.[68] Mr. Day is a licensed Class IV wastewater treatment plant operator (Certificate No. 21226) but is not a licensed professional engineer.

Q: Did the Assessment by D&S Water and Wastewater Services address all of EPA's requirements for the Engineering Evaluation?

A: No. It did not address items a, b, and c.

Q: Has Applicant hired an engineer?

A: In response to DR 1-10, Applicant stated "Evaluation by engineer working on upgrade to permit" but did not identify the engineer. In a recent Status Report submitted to US EPA, Applicant identified the engineer, stating:

> In an effort to keep from going over our ammonia requirements we have contracted with an engineer, Stephen Fralish, we believe that if we modify the permit to add aeration to the polishing ponds, this will eliminate our ammonia violations. Because of his schedule, he stated that January would be the earliest he could get started.[69]

[67] OUCC Attachment JTP-4 includes Petitioner's response to DR 1-10, which included the Assessment report by Leslie Day of D&S Water & Wastewater Services. The letter report is undated, but the file properties indicate it was created on June 7, 2022.

[68] Applicant replaced Mr. Day as the certified operator with Michael Stuckey of MS Waters on June 5, 2024.

[69] *See* Attachment JTP-16 for the Pleasantview Utilities, Inc. Status Report to the US EPA, October 29, 2024.

Note that Applicant reported numerous exceedances of its NPDES effluent limitations (concentration and mass limits) for ammonia in 18 of the last 20 months since January 2023. My review of Discharge Monitoring Reports and Monthly Reports of Operation show nearly 70 exceedances of the ammonia limits plus other exceedances.[70] This keeps Applicant in continued significant non-compliance with its NPDES permit.

Q: Based on recent inspections, was IDEM concerned about the condition of Applicant's package plant?

A: Yes. In the last two facility inspections, IDEM noted the poor condition of the assets:

> 1. Facility/Site was rated as unsatisfactory. The WWTP is in poor condition with corrosion obvious in several areas. This is a violation of 327 IAC 5-22-10 which requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant. Specifically, if the permittee plans to continue to operate this WWTP they must put a plan in place for replacement of the equipment.[71]
>
> (Emphasis added.)

> 3. Facility/Site was rated as unsatisfactory.
> a. The WWTP is in poor condition with corrosion obvious in several areas. This is a violation of 327 IAC 5-22-10 which requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant. Specifically, if the permittee plans to continue to operate this WWTP they must put a plan in place for replacement of the equipment.[72]
>
> (Emphasis added.)

[70] Petitioner has had several reporting errors on the DMRs and MROs such as underreporting the number of effluent violations, not reporting operator hours at the WWTP, reporting the exact same daily effluent flows in different months (March and May 2024), and underreporting effluent flows due to improper bypassing.

[71] IDEM Inspection Summary/ Noncompliance Letter for the March 2, 2022, Compliance Evaluation Inspection, March 4, 2022, p. 1

[72] IDEM Inspection Summary/ Noncompliance Letter for the April 29, 2024, Compliance Evaluation Inspection, May 2, 2024, p. 1

Q: Has Petitioner been ordered to evaluate connecting to a nearby municipal system?

A: Yes. Multiple times, IDEM ordered Applicant to evaluate connecting to the Connersville system, which is the nearest wastewater system. The US EPA ordered Applicant to evaluate alternatives to on-site wastewater treatment, such as conveying wastewater to a nearby municipal wastewater treatment plant.[73]

Q: Does Connersville's WWTP have available capacity?

A: Yes. According to the Monthly Reports of Operation, Connersville's existing WWTP has a capacity of 10.8 MGD but treated an average of 2.68 MGD in 2023.

Q: What is Connersville's volumetric sewer rate?

A: Connersville enacted a three-phase sewer rate increase in 2022 to fund operations and finance combined sewer overflow projects. The Phase III volumetric rate of $2.71 per 100 cubic feet will take effect on January 1, 2025, as well as increases in the monthly service charge that range between $30.30 for a 5/8 – ¾ inch meter up to $3,818.81 for an 8-inch meter.[74] A 10% outside city surcharge is also assessed. Converting the volumetric rate to units of 1,000 gallons per month and applying the 10% outside of city surcharge results in a volumetric rate of $3.97 per 1,000 gallons.

Q: What would the sewer bill from Connersville be if the Pleasantview subdivision's wastewater was pumped to the Connersville WWTP for treatment?

A: I estimated the annual volumetric charge, based on the total effluent flows reported by Applicant to IDEM from January 1, 2021 to August 31, 2024 as shown in Table 1 and in Table 2 and Connersville's 2025 Phase III rates. The volumetric charge would be

[73] *See* Attachment JTP-15 for the Final Administrative Order on Consent Under Section 309(a) of the Clean Water Act, 33 U.S.C. § 1319(a), January 28, 2022, pp. 4-5

[74] Ordinance No. 6842 establishing rates and charges of the sewage treatment system of the City of Connersville, Indiana, adopted on April 18, 2022.

$42,805 per year or an average of $3,567 per month. Adding in the monthly service charge for an assumed 2-inch meter of $239.48 would increase the total sewer bill to $3,806.48 per month or $45,678 per year.[75, 76]

Table 2

OUCC Estimated Volumetric Charges to Discharge to Connersville (based on Phase III Rates in effect 01/01/2025)

	2021	2022	2023	2024	Total
Total Treated Flow (MG)	14.311	8.9536	8.3781	7.8821	39.5248
Connersville Rate per 100 CF	$ 2.71	$ 2.71	$ 2.71	$ 2.71	$ 2.71
Rate per 1,000 gallons	$ 3.61	$ 3.61	$ 3.61	$ 3.61	$ 3.61
Outside City Surcharge 10%	$ 0.36	$ 0.36	$ 0.36	$ 0.36	$ 0.36
Total Rate per 1,000 gallons	$ 3.97	$ 3.97	$ 3.97	$ 3.97	$ 3.97
Disposal at Connersville	$ 56,829	$ 35,555	$ 33,269	$ 31,300	$ 156,953
Months	12	12	12	8	44
Avg. Monthly Disposal Cost	$ 4,736	$ 2,963	$ 2,772	$ 3,912	$ 3,567
Avg. Disposal Cost per year	$ 56,829	$ 35,555	$ 33,269	$ 46,950	$ 42,805
Customers	199	201	203	206	206
Volumetric Flat Rate Cost per month	$ 23.80	$ 14.74	$ 13.66	$ 18.99	$ 17.32

Q: What do you recommend regarding the need for an assessment of future options to provide wastewater collection and treatment service?

A: I agree with IDEM and the US EPA that Applicant has numerous longstanding deficiencies in its collection system and wastewater treatment plant and that its numerous effluent violations, excessive I&I, and deteriorated conditions of its sewers and wastewater treatment plant need to be corrected. Applicant has been given more

[75] Increasing the annual wastewater volume by 10% to account for bypassed sewage flows would increase the annual volumetric charge from $3,567 per month to $3,924 per month. Combined with the same monthly service charge of $239.48, the monthly sewer bill would be $4,163 or $49,958 per year.

[76] These costs are estimated based on volumetric and monthly service charge costs by Connersville. They do not include the capital costs for the connection to Connersville (lift station and force main) or the operating and maintenance costs for the lift station and force main.

than twenty-five (25) years to correct these problems and come into compliance with the effluent limits. But it has failed to do so, which has recently produced nearly 70 effluent discharge violations for ammonia and other pollutants over the last twenty (20) months. I concur with OUCC witness, Scott Bell's recommendation that the Commission initiate a review, pursuant to Ind. Code ch. 8-1-30, into the operations of the wastewater utility to determine whether there are severe deficiencies that the utility has failed to remedy and whether a receiver should be appointed.

VI. RECOMMENDATIONS

Q: What are your recommendations?

A: My recommendations are as follows:

1. I recommend the Commission direct Applicant to fill in all sewer system information requested on the Commission's forms for its Annual Reports.
2. I recommend the Commission order Applicant to start maintaining an asset register of its sewer system assets to record pertinent sewer information (e.g. diameter, pipe material, year installed, segment length, manhole numbers, sewer invert elevations) and costs for sewer main and manhole replacements / rehabilitations.
3. I recommend that the Commission order Applicant to institute a bona fide sewer cleaning and televising program along with smoke testing as it originally proposed over 10 years ago in Cause No. 44351-U to document the conditions of its gravity sewers and manholes, locate I&I sources, and prioritize removal of the I&I through replacement/rehabilitation of deteriorated sewers and manholes.
4. I recommend the Commission order Pleasantview Utilities, at no cost to ratepayers,

to create and maintain a regularly updated overall sewer system map in accordance with the Indiana Administrative Code.

5. I recommend that the Commission direct Applicant to provide the IURC and the OUCC with a copy of its Asset Management Plan that it has claimed it has for over 16 years within 30 days following issuance of the Final Order in this Cause.
6. If no Asset Management Plan exists, I recommend the Commission order Applicant to complete one at no cost to ratepayers and submit copies of the Final Asset Management Plan to the IURC and the OUCC within six (6) months of the Final Order in this Cause.
7. To assist in correcting the aeration system issues Applicant's operator reports is causing the effluent violations, I recommend the Commission order Applicant to develop a plan to accomplish the cleaning and inspecting of all tanks and clarifiers in the steel package plant.
8. I recommend Applicant engage a structural engineer to inspect the steel tanks when they are offline for cleaning and to assess whether the package plant has reached the end of its useful life and should be removed from service.

Q: Does this conclude your testimony?

A: Yes.

Appendix A

Q: Please describe your educational background and experience.

A: In 1980 I graduated from Purdue University, where I received a Bachelor of Science degree in Civil Engineering, having specialized in Environmental Engineering. I then worked with the Peace Corps for two years in Honduras as a municipal engineer and as a Project Engineer on self-help rural water supply and sanitation projects funded by the U.S. Agency for International Development (U.S. AID). In 1984 I earned a Master of Science degree in Civil Engineering and Environmental Engineering from Purdue University. I have been a Registered Professional Engineer in the State of Indiana since 1986. In 1984, I accepted an engineering position with Purdue University and was assigned to work as a process engineer with the Indianapolis Department of Public Works ("DPW") at the City's Advanced Wastewater Treatment Plants. I left Purdue and subsequently worked for engineering consulting firms, first as a Project Engineer for Process Engineering Group of Indianapolis and then as a Project Manager for the consulting firm HNTB in Indianapolis. In 1999, I returned to DPW as a Project Engineer working on planning projects, permitting, compliance monitoring, wastewater treatment plant upgrades, and combined sewer overflow control projects.

Q: What are the duties and responsibilities of your current position?

A: My duties include evaluating the condition, operation, maintenance, expansion, and replacement of water and wastewater facilities at utilities subject to Indiana Utility Regulatory Commission ("Commission") jurisdiction.

Q: Have you previously testified before the Commission?

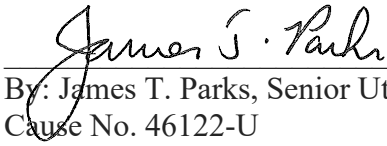
A: Yes.

Appendix B - List of Attachments

Attachment JTP-1	IDEM Inspection Summary/ Noncompliance Letters dated June 10, 2020, September 1, 2021, March 4, 2022, and May 2, 2024.
Attachment JTP-2	Applicant's responses to Data Requests 5-1 through 5-9 pertaining to the gravity sanitary sewer collection system.
Attachment JTP-3	Approved Compliance Plan, IDEM Agreed Order Case No. 2005-1 4957-W, June 4, 2007, provided as Attachment No. 6 to the OUCC Report, September 27, 2013, in Cause No. 43313-U.
Attachment JTP-4	Applicant's response to DR 1-10
Attachment JTP-5	Asset Management Program Guidance for the Indiana State Revolving Fund Loan Program, Indiana Finance Authority, July 2024
Attachment JTP-6	Applicant's reported sewer cleaning and televising metrics submitted in Appendix A – Performance Measures to Applicant's 2020 to 2023 IURC Annual Reports.
Attachment JTP-7	2023 sewer cleaning invoices from Connersville and Culy Contracting
Attachment JTP-8	Excerpts from Cause No. 44351-U (Final Order, March 26, 2014) about raising the annual Maintenance Expense to $13,700 for cleaning and televising 10% of the sewers ($4,500), smoke testing ($1,200), and pond maintenance ($8,000).
Attachment JTP-9	Notice and Order of the Commissioner of the Department of Environmental Management, Cause No. B-2486, June 20, 2000.
Attachment JTP-10	IDEM Construction Permit Approval No. 20779, Pleasantview Utilities, Inc. Wastewater Treatment Plant Improvements, September 4, 2013 including the Design Summary, Construction Permit application, Notice of Deficiency, and Engineer responses.
Attachment JTP-11	Pleasantview Infiltration & Inflow Analysis – All 2021 – 2023 Monthly Data and Months with Negative I&I Excluded
Attachment JTP-12	OUCC Calculation of Average Meter Age
Attachment JTP-13	November 21, 2024 Site Visit Photos compared to July 18, 2002 Site Visit Photos
Attachment JTP-14	327 IAC 5-10-7 Connection and Regionalization
Attachment JTP-15	Final Administrative Order on Consent Under Section 309(a) of the Clean Water Act, 33 U.S.C. § 1319(a), January 28, 2022
Attachment JTP-16	Pleasantview Utilities, Inc. Status Report to the US EPA, October 29, 2024.

AFFIRMATION

I affirm the representations I made in the foregoing testimony are true to the best of my knowledge, information, and belief.



By: James T. Parks, Senior Utility Analyst
Cause No. 46122-U

Office of Utility Consumer Counselor (OUCC)

Date: December 12, 2024

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.

100 N. Senate Avenue ● Indianapolis, IN 46204
(800) 451-6027 ● (317) 232-8603 ● www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

June 10, 2020

Via Email to: msherck@co.fayette.in.us
Mr. Matt Sherck, Owner
Pleasantview Utilities
3812 W Galaxy Dr
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: **Inspection Summary/ Noncompliance Letter**
Pleasantview Utilities WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Office of Water Quality, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: June 05, 2020

Type of Inspection: Compliance Evaluation Inspection

Inspection Results: Violations were observed.

The following concerns were noted:

1. The Compliance Schedules evaluation generated an unsatisfactory rating. The facility has entered into an Administrative Order on Consent with the U.S. EPA. They are still in non-compliance with effluent limit violations, and therefore have not completed the necessary requirements of the Order.

2. The Collection System evaluation generated a marginal rating. The facility continues to have excessive I/I in the collection system. The flow at the WWTP was above 90% capacity for three months out of the 11 reviewed.

3. Facility/Site was rated as marginal. The WWTP is in deteriorating condition due to age.

4. Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. Excessive Ammonia and DO violations

indicate the plant is not operated efficiently. Excessive solids and algae buildup in the chlorine contact tank deplete the chlorine and the dissolved oxygen. More air should be added for post aeration to assure the effluent DO minimum is met at all times. Excessive solids buildup in the polishing ponds would allow for the discharge of high ammonia levels. Inspector was unable to determine levels of solids in the polishing pond due to cover of duckweed on both ponds. But this should be investigated by the operator. The July 2019 MRO and bench sheets was reviewed as part of the inspection. These reports indicated MLSS values of 346-664 mg/L and 0 ml/L 30 minute settling. This indicates very poor operational conditions and suggests a washout of solids happened at some time.

5. Maintenance was rated as unsatisfactory due to an inadequate preventative maintenance program. This is a violation of Part II. B. 1 of the permit which requires all facilities to be operated and maintained as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. Inspector has repeatedly requested that all maintenance activities be documented and those records be made available for inspection. All maintenance, both preventative and repairs must be documented.

6. The Records/Reports evaluation generated an unsatisfactory rating. Part I. B. 3 of the permit requires the permittee to submit monitoring reports no later than the 28th day of the month following each completed monitoring period. These reports shall include the Discharge Monitoring Report (DMR) and the Monthly Report of Operation (MRO). At the time of the inspection, it was determined you have not submitted records for April 2020. In addition the reports for September and December 2019, and January, February and March 2020 were submitted late. The April 2020 report must be submitted immediately and all future reports must be submitted by the deadline.

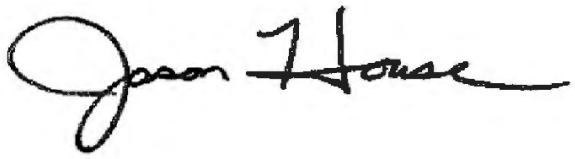
7. The Effluent Limits Compliance area was rated unsatisfactory due to self-reported violations of the limits detailed in Part I. A. of the NPDES Permit. Review of DMRs revealed 61 DO violations, 35 Ammonia violations, and two chlorine contact tank violations.

Part II. A. 1. of your permit requires you to comply with its terms and conditions. Any noncompliance with the terms of your permit may subject you to an enforcement action which can include the imposition of penalties. You are required to immediately take all necessary measures to comply with the terms and conditions of your NPDES Permit, specifically those violations identified above.

Within 30 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in formal enforcement action. Please direct your response to this letter to our letterhead address or via email to wwViolationResponse@idem.IN.gov. **If the non-compliance issues addressed in this report/letter are attributable to the COVID-19 pandemic, please provide this information in your response to this Office.** Any questions should be directed to Becky Ruark at 317-691-1909 or by email to bruark@idem.IN.gov

. Thank you for your attention to this matter.

Sincerely,



Jason House, Chief
Wastewater Compliance Branch
Office of Water Quality

Enclosure

NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number:	Facility Type:		Facility Classification:	TEMPO AI ID
IN0044776	Mixed Ownership	Minor	I	1582

Date(s) of Inspection: June 05, 2020

Type of Inspection: Compliance Evaluation Inspection

Name and Location of Facility Inspected:
Pleasantview Utilities WWTP
3812 W Galaxv Dr
Connersville IN 47331 County: Fayette

Receiving Waters: Tributary to Williams Creek

Permit Expiration Date: 10/31/2021

Design Flow: 0.06MGD

On Site Representative(s):

First Name	Last Name	Title	Email	Phone
Josh	Landstrom	Certified Operator	landstrom1980@gmail.com	765-698-6889

Was a verbal summary of findings presented to the on-site representative? **Yes**

Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:
F. Josh Landstrom	20074	I	8-27-19	6-30-22	landstrom1980@gmail.com

Cyber Security Contact:
Name: Email:

Responsible Official:
Mr. Matt Sherck, Owner
3812 W Galaxy Dr
Connersville, Indiana 47331

Permittee: Pleasantview Utilities
Email: msherck@co.fayette.in.us
Phone:
Fax:
Contacted? Yes

INSPECTION FINDINGS

- ○ Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- ○ Violations were discovered but corrected during the inspection. (4)
- ○ Potential problems were discovered or observed. (3)
- ● Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- ○ Violations were discovered and may subject you to an appropriate enforcement response. (1)

AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	Receiving Waters	M	Facility/Site	S	Self-Monitoring	U	Compliance Schedules
S	Effluent	U	Operation	S	Flow Measurement	N	Pretreatment
S	Permit	U	Maintenance	N	Laboratory	U	Effluent Limits Compliance
M	Collection System	N	Sludge	U	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

Receiving Waters:

S 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.

Comments:
The receiving stream, observed at the outfall, was free of notable foam, algae or solids.

Effluent:

S 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.

Comments:
The effluent, observed at the outfall, was clear and free of color at the time of the inspection.

Permit:

S 1. Did the facility have a current copy of the permit available for reference?

N 2. If the permit expires within 180 days, has a renewal application been submitted?

S 3. Receiving waters and Facility Description in the permit reflect actual conditions at the facility.

N 4. The permit has been properly transferred if there is a new owner.

Comments:
The facility was found to have a valid permit and the facility description, including units of treatment and receiving stream, is accurate. The current permit expires next year. The facility will need to submit a permit renewal application, at a minimum, 180 days prior to the expiration date.

Collection System:

N 1. CSO's were found to be adequately monitored and maintained.

S 2. There were zero maintenance-related (clogged or blocked lines) overflow events in last 12 months.

S 3. There were zero hydraulic (I&I) overflow events in last 12 months.

N 4. Facility has met SSO and dry weather CSO reporting requirements

N 5. Any adverse impacts from SSO and CSO events have been properly mitigated.

N 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.

M 7. Collection system maintenance activities appeared to be adequate.

Comments:
The Collection System evaluation generated a marginal rating. The facility continues to have excessive I/I in the collection system. The flow at the WWTP was above 90% capacity for three months out of the 11 reviewed. The operator stated that the facility has had no overflow at the WWTP or in the collection system in the last 12 months.

Facility/Site:

S 1. The facility was found to have standby power or equivalent provision.

S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility and lift stations.

S 3. Safe and adequate access was provided for inspection of all units and outfalls.

M 4. Facilities and equipment did not appear beyond their useful life.

5. List any safety concerns:

Comments:
Facility/Site was rated as marginal. The WWTP is in deteriorating condition due to age.

Operation:

U 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including a report for an anticipated bypass report for steps of treatment taken out of service.

S 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:

a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
b. Adequate documentation of operational activities, including system monitoring and cleaning.
c. Adequate funding to ensure proper operation.

U 3. Solids handling procedures include.

a. Sufficient solids wasted from the treatment system, in a timely manner, to maintain process efficiency.
b. Wasting of solids based on appropriate operational targets and valid process control testing.
c. Adequate documentation of solids removal, handling, or control was available for review.

N 4. The facility was found to be operated efficiently during wet weather events.

Comments:
Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. Excessive Ammonia and DO violations indicate the plant is not operated efficiently. Excessive solids and algae buildup in the chlorine contact tank deplete the chlorine and the dissolved oxygen. More air should be added for post aeration to assure the effluent DO minimum is met at all times. Excessive solids buildup in the polishing ponds would allow for the discharge of high ammonia levels. Inspector was unable to determine levels of solids in the polishing pond due to cover of duckweed on both ponds. But this should be investigated by the operator. The July 2019 MRO and bench sheets was reviewed as part of the inspection. These reports indicated MLSS values of 346-664 mg/L and 0 ml/L 30 minute settling. This indicates very poor operational conditions and suggests a washout of solids happened at some time.

Maintenance:

U 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.

S 2. Facility maintenance activities appeared to be adequate.

Comments:
Maintenance was rated as unsatisfactory due to an inadequate preventative maintenance program. This is a violation of Part II. B. 1 of the permit which requires all facilities to be operated and maintained as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. Inspector has repeatedly requested that all maintenance activities be documented and those records be made available for inspection. All maintenance, both preventative and repairs must be documented.

Sludge:

N 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

Comments:
No recent sludge removal has occurred.

Self-Monitoring:

S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
S 2. Flow-proportioned samples were found to be obtained where needed.
S 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.
S 4. Sample collection procedures, including automatic sampling, were found to include:
- a. Samples refrigerated during compositing.
- b. Proper preservation techniques used.
- c. Containers and holding times conformed to 40 CFR 136.3.

S 5. Sample documentation was found to be adequate and included:
- a. Dates, times, and locations of sampling.
- b. Name of individual performing sampling.
- c. Instantaneous flow for flow-weighted aliquots.
- d. Chain of Custody records.

N 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were found to be met.

Comments:
The Self Monitoring Program was rated as satisfactory. All sampling practices, including influent, effluent, and intermediate unit process testing, are conducted accurately and at the frequency required by the permit.

Flow Measurement:

S 1. Flow was found to be properly monitored as required by the permit.
S 2. Flow data and calibration records were available for review.

Comments:
The facility's flow measurement program, including all documentation, appeared to be adequate and representative. The effluent flow meter was last calibrated on July 19, 2019.

Laboratory:

The following laboratory records were reviewed:

D. O. Bench Sheets	Chlorine Bench Sheets	CBOD Bench Sheets
TSS Bench Sheets	Ammonia Bench Sheets	pH Bench Sheets
E. coli Bench Sheets		

N 1. The laboratory practices and protocol reviewed were adequate, including:
- a. A written laboratory QA/QC manual was available.
- b. Samples were found to be properly stored.
- c. Approved analytical methods were found to be used.
- d. Calibration and maintenance of instruments was found to be adequate.
- e. QA/QC procedures were found to be adequate.
- f. Dates of analyses (and times where required) were recorded.
- g. Name of person performing analyses was recorded.

S 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Contract Lab Information

Laurel WWTP Lab	Laurel

Comments:
Analysis for pH, DO and chlorine are completed on-site. All others are taken to the Laurel WWTP for analysis. Bench sheets were reviewed and appeared to be adequate.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of May 2019 to March 2020 were reviewed as part of the inspection.

U 1. All facility records for the period including the previous three years were available for review.
U 2. DMRs and MROs were found to be completed properly and accurately including:
   a. "No Ex" column was accurate.
   b. Signatory requirements were met.
   c. Reports were prepared by or under the direction of a certified operator.
N 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:
The Records/Reports evaluation generated an unsatisfactory rating. Part I. B. 3 of the permit requires the permittee to submit monitoring reports no later than the 28th day of the month following each completed monitoring period. These reports shall include the Discharge Monitoring Report (DMR) and the Monthly Report of Operation (MRO). At the time of the inspection, it was determined you have not submitted records for April 2020. In addition the reports for September and December 2019, and January, February and March 2020 were submitted late. The April 2020 report must be submitted immediately and all future reports must be submitted by the deadline.

Compliance Schedules:

N 1. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.
U 2. Agreed Order compliance milestones have been met.

Comments:
The Compliance Schedules evaluation generated an unsatisfactory rating. The facility has entered into an Administrative Order on Consent with the U.S. EPA. They are still in non-compliance with effluent limit violations, and therefore have not completed the necessary requirements of the Order.

Pretreatment:

N 1. No evidence of interference from industrial or other sources of toxic substances was noted.
N 2. For both Delegated and Non-Delegated pretreatment programs:
   a. Industrial or commercial dischargers were found to be regulated as required.
   b. The permitee was found to enforce the Sewer Use Ordinance (SOU) and the Enforcement Response Plan (ERP).
N 3. If the non-delegated permittee accepts hauled waste:
   a. Does the POTW provide written permission to haulers?
   b. Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
   c. Does the POTW retain records of each load?

Comments:
The facility has no industrial sources.

Effluent Limits Compliance:

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of May 2019 to March 2020 were reviewed as part of the inspection.

Yes 2. Were violations noted during the review of DMRs?

Comments:
The Effluent Limits Compliance area was rated unsatisfactory due to self-reported violations of the limits detailed in Part I. A. of the NPDES Permit. Review of DMRs revealed 61 DO violations, 35 Ammonia violations, and two chlorine contact tank violations.

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Becky Ruark	bruark@idem.IN.gov	317-691-1909

IDEM MANAGER REVIEW

IDEM Manager:	Date:
Andy Schmidt	6/9/2020

Pleasantview Utilities

3812 W Galaxy Drive, Connersville, IN 47331
(765) 309-2973

June 29, 2020

Jason House, Chief
Wastewater Compliance Branch
IDEM, Office of Water Quality
100 N Senate Ave
P.O. Box 6015
Indianapolis, IN 46206-6015

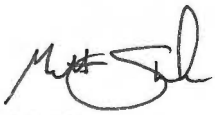
Re: Inspection Summary/ Noncompliance Letter Response
Pleasantview Utilities WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

To Whom It May Concern:

In response to the inspection letter dated June 10, 2020. In response to each area of concern:

1) Pleasantview Utilities has been in compliance since entering the order of consent with the U.S. Epa. Operator stated that we have been meeting requirements of our permit.
2) We continue to evaluate and replace lines and repair manholes as areas when determined to be adding to INI
3) Facility is older but we have increased daily maintenance. Surprised by this statement as the inspector verbally stated that the plant looked as good as she had seen it.
4) Chlorine contact tank was cleaned out after inspection, polishing ponds are pumped and land applied when needed to remove excess solids. At this time not necessary. Putting a plan together to control duckweed.
5) Operator agreed to start keeping a maintenance log.
6) Operator stated will get reports turned in in timely mannor
7) The violations were self reported, we are taking steps to operate the plant as effectively as possible so that we will not have violations to report.

Sincerely,



Matt Sherck
President, Pleasant View Utilities, Inc.
msherck@co.fayette.in.us

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue ● Indianapolis, IN 46204
(800) 451-6027 ● (317) 232-8603 ● www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

September 01, 2021

Via Email to: msherck@co.fayette.in.us
Mr. Matt Sherck, Owner
Pleasantview Utilities, Inc.
3812 W Galaxy Dr.
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: **Inspection Summary/ Noncompliance Letter**
Pleasantview Subdivision WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Office of Water Quality, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: August 25, 2021
Type of Inspection: Complaint Investigation
Inspection Results: Violations were observed.

The following concerns were noted:

1. Complainant alleges a strong odor from the WWTP for a couple weeks. Inspector spoke with owner by phone. He indicated that air headers came loose. No proper aeration for some time. Plant had gone septic. Inspector observed septic conditions in the WWTP. Dark septic discharge was leaving the WWTP and a pool of black discharge was evident in the receiving stream.

2. Part I. A. 2 of the permit prohibits the discharge from any and all point sources specified within this permit from causing the receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: 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 degree as to create nuisance. The Receiving Waters Appearance was rated as unsatisfactory due to black color evident in the receiving stream.

3. Part I. A. 2 of the permit prohibits the discharge from any point sources specified within this permit from causing receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: (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 degree as to create nuisance; (4) which are in amounts sufficient to be acutely toxic to, or to 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. Effluent Appearance was rated as unsatisfactory due to dark color and strong odor.

4. Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. At the time of the inspection all treatment units were dark and discolored indicating septic conditions. Aeration equipment had a major failure and had been repaired the day of the inspection.

Part II. A. 1. of your permit requires you to comply with its terms and conditions. Any noncompliance with the terms of your permit may subject you to an enforcement action which can include the imposition of penalties. You are required to immediately take all necessary measures to comply with the terms and conditions of your NPDES Permit, specifically those violations identified above.

Within 10 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Please direct your response to this letter to our letterhead address or via email to wwviolationresponse@idem.in.gov . Any questions should be directed to Becky Ruark at 317-691-1909 or by email to bruark@idem.in.gov . Thank you for your attention to this matter.

Sincerely,

Samantha Groce, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure

NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number:	Facility Type:		Facility Classification:	TEMPO AI ID
IN0044776	Mixed Ownership	Minor	I	1582

Date(s) of Inspection: August 25, 2021

Type of Inspection: Complaint Investigation

Name and Location of Facility Inspected:

Pleasantview Subdivision WWTP
3812 W Galaxy Dr
Connersville IN 47331 County: Fayette

Receiving Waters: Tributary to Williams Creek

Permit Expiration Date: 10/31/2021

Design Flow: 0.06 MGD MGD

On Site Representative(s):
No facility rep was met at the site.

Was a verbal summary of findings presented to the on-site representative? **No**

Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:
F. Josh Landstrom	20074	I	8-27-19	6-30-22	landstrom1980@gmail.com

Cyber Security Contact:
Name: Email:

Responsible Official:
Mr. Matt Sherck, Owner
3812 W Galaxy Dr.
Connersville, Indiana 47331

Permittee: Pleasantview Utilities, Inc.
Email: msherck@co.fayette.in.us
Phone: Contacted?
Fax:

INSPECTION FINDINGS

- ○ Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- ○ Violations were discovered but corrected during the inspection. (4)
- ○ Potential problems were discovered or observed. (3)
- ◉ Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- ○ Violations were discovered and may subject you to an appropriate enforcement response. (1)

AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

U	Receiving Waters	N	Facility/Site	N	Self-Monitoring	N	Compliance Schedules
U	Effluent	U	Operation	N	Flow Measurement	N	Pretreatment
N	Permit	N	Maintenance	N	Laboratory	N	Effluent Limits Compliance
N	Collection System	N	Sludge	N	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

Complainant alleges a strong odor from the WWTP for a couple weeks. Inspector spoke with owner by phone. He indicated that air headers came loose. No proper aeration for some time. Plant had gone septic. Inspector observed septic conditions in the WWTP. Dark septic discharge was leaving the WWTP and a pool of black discharge was evident in the receiving stream.

Receiving Waters:
Comments:
Part I. A. 2 of the permit prohibits the discharge from any and all point sources specified within this permit from causing the receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: 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 degree as to create nuisance. The Receiving Waters Appearance was rated as unsatisfactory due to black color evident in the receiving stream.

Effluent:
Comments:
Part I. A. 2 of the permit prohibits the discharge from any point sources specified within this permit from causing

receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: (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 degree as to create nuisance; (4) which are in amounts sufficient to be acutely toxic to, or to 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. Effluent Appearance was rated as unsatisfactory due to dark color and strong odor.

Operation:

Comments:

Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. At the time of the inspection all treatment units were dark and discolored indicating septic conditions. Aeration equipment had a major failure and had been repaired the day of the inspection.

Effluent Limits Compliance:

No 1. Were DMRs reviewed as part of the inspection?

Comments:

IDEM REPRESENTATIVE		
Inspector Name:	Email:	Phone Number:
Becky Ruark	bruark@idem.IN.gov	317-691-1909

IDEM MANAGER REVIEW	
IDEM Manager:	Date:
Samantha Groce	9/1/2021

Pleasantview Utilities

3812 W Galaxy Drive, Connersville, IN 47331
(765) 309-2973

IN0044776
Fayette Co.

September 8, 2021

Samantha Groce
Chief Wastewater Inspection Section
Office of Water Quality
100 N Senate Ave
P.O. Box 6015
Indianapolis, IN 46206-6015

Re: Noncompliance Letter Response
Pleasantview Utilities WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

To Whom It May Concern:

In response to the letter dated September 1, 2021. Repairs were made to the air system prior to inspection. The repair was removing a PVC air header and replacing with steel. In addition to this repair, the plant operator is installing air diffusers onto air drops to improve oxygen levels in plant. The back-up blower has also been removed and taken for repairs.

New guidelines for plant operation have been placed on current operator to require plant to be better managed or operator will be replaced.

Sincerely,

Matt Sherck
President, Pleasant View Utilities, Inc.
msherck@co.fayette.in.us

Indiana Department of Environmental Management
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100 N. Senate Avenue ● Indianapolis, IN 46204
(800) 451-6027 ● (317) 232-8603 ● www.idem.IN.gov

Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

March 04, 2022

Via Email to: msherck@co.fayette.in.us
Mr. Matt Sherck, Owner
Pleasantview Utilities
3812 N Galaxy Dr
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: **Inspection Summary/ Noncompliance Letter**
Pleasantview Subdivision
NPDES Permit No. IN0044776
Connersville, Fayette County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Office of Water Quality, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: March 02, 2022

Type of Inspection: Compliance Evaluation Inspection

Inspection Results: Violations were observed.

The following concerns were noted:

1. Facility/Site was rated as unsatisfactory. The WWTP is in poor condition with corrosion obvious in several areas. This is a violation of 327 IAC 5-22-10 which requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant. Specifically, if the permittee plans to continue to operate this WWTP they must put a plan in place for replacement of the equipment.

2. Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. As demonstrated by excessive effluent limit violations, the WWTP is not efficiently operated. Several inches of solids buildup was apparent in the chlorine contact tank. Clumps of sludge were floating in the clarifier. No air was present in the sludge holding tank. The owner indicated that the solids from this holding tank had been used to reseed the WWTP after solids washout. This is poor practice in general, but especially because the tank was without aeration.

3. Maintenance was rated as unsatisfactory due to an inadequate preventative maintenance program. This is a violation of Part II. B. 1 of the permit which requires all facilities to be operated and maintained as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. Inspector was unable to determine what maintenance was completed in the WWTP due to the lack of records. An air leak was present at an abandoned aerator at the edge of the polishing pond.

4. Sludge Disposal was rated as marginal. No sludge from the sludge holding tank has been land applied in the last year. The permittee did remove approximately 224,000 gallons of material from the polishing ponds in November 2021. This material was land applied under permit INLA000699. The owner acknowledged receipt of a letter from IDEM Office of Land Quality indicating problems with reporting and not meeting E. coli limits.

5. The Self Monitoring Program was rated as unsatisfactory for not monitoring final effluent at the frequency required by the permit. This is a violation of Part I. A. 1 of the permit which sets forth the effluent monitoring frequencies applicable to the discharge from Outfall 001. No samples were collected/analyzed for the week of October 11-17, 2021.

6. The Laboratory evaluation generated an unsatisfactory rating. Part I. B. 5 of the permit requires the analytical and sampling methods used to conform to the current version of 40 CFR, Part 136, unless otherwise specified. E. coli data for April, May, and June 2021 was determined to be falsified based on a lab inspection on July 1, 2021. Inspector was unable to determine validity of E. coli data for July, August, September, and October 2021. Permittee must submit information documenting where samples were analyzed and what equipment was used for analysis. No bench sheets for any parameter were available for March and May 2021. No E. coli bench sheets were available for October 2021. This is a violation of Part I. B. 6 of the NPDES permit which requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit.

7. The Records/Reports evaluation generated an unsatisfactory rating. Part I. B. 3 of the permit requires the permittee to electronically submit monitoring reports no later than the 28th day of the month following each completed monitoring period. These reports shall include the Discharge Monitoring Report (DMR) and the Monthly Report of Operation (MRO). At the time of the inspection, it was determined you have not submitted records for January 2022. In addition reports for 10 of 12 months in 2021 were submitted late. Part I. B. 8 of the permit requires the permittee to retain, for a minimum of three years, all records and information resulting from the monitoring activities required by the permit, including all records of analyses performed. In cases where the original records are kept at another location, a copy of all such records shall be kept at the permitted facility. At the time of the inspection, all DMRs and most MROs for 2021 were unavailable for

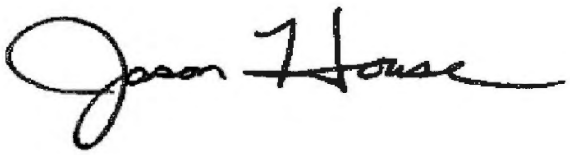
review. Part II. C. 4 of the permit requires the permittee to provide an explanation for each effluent limit violation in the comments section of the DMR. Effluent limit violations were reported in 10 of 12 months with no explanations. The records submitted must also be accurate and complete. The April 2021 DMR was originally submitted without the accompanying MRO. When requested for a revision, the April 2020 MRO was submitted with only the year changed to 2021. This report must be revised and resubmitted. Many other errors in reporting have been made and IDEM staff have had to request (often multiple times) revisions to reports submitted for this permit.

8. The Effluent Limits Compliance area was rated unsatisfactory due to self-reported violations of the limits detailed in Part I. A. of the NPDES Permit. Review of DMRs revealed the following: 31 Dissolved Oxygen violations, one pH violation, 22 Ammonia violations, two Chlorine Contact Tank violations, seven Chlorine Effluent violations, three TSS violations, and four TSS % Removal violations.

Part II. A. 1. of your permit requires you to comply with its terms and conditions. Any noncompliance with the terms of your permit may subject you to an enforcement action which can include the imposition of penalties. You are required to immediately take all necessary measures to comply with the terms and conditions of your NPDES Permit, specifically those violations identified above.

Within 30 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in formal enforcement action. Please direct your response to this letter to our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Becky Ruark at 317-691-1909 or by email to bruark@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,



Jason House, Chief
Compliance and Enforcement Branch
Office of Water Quality

Enclosure

NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number:	Facility Type:		Facility Classification:	TEMPO AI ID
IN0044776	Municipality	Minor	I	1582

Date(s) of Inspection: March 02, 2022

Type of Inspection: Compliance Evaluation Inspection

Name and Location of Facility Inspected:
Pleasantview Subdivision
3812 W Galaxy Dr
Connersville IN 47331 County: Fayette

Receiving Waters: Tributary to Williams Creek

Permit Expiration Date: 10/31/2026

Design Flow: 0.06MGD

On Site Representative(s):

First Name	Last Name	Title	Email	Phone
Matt	Sherck	Owner	msherck@co.fayette.in.us	

Was a verbal summary of findings presented to the on-site representative? **Yes**

Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:
F. Josh Landstrom	20074	I	8-27-19	6-30-22	landstrom1980@gmail.com

Cyber Security Contact:
Name: Email:

Responsible Official:
Mr. Matt Sherck, Owner
3812 N Galaxy Dr
Connersville, Indiana 47331

Permittee: Pleasantview Utilities
Email: msherck@co.fayette.in.us
Phone:
Fax:
Contacted? Yes

INSPECTION FINDINGS

- ○ Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- ○ Violations were discovered but corrected during the inspection. (4)
- ○ Potential problems were discovered or observed. (3)
- ● Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- ○ Violations were discovered and may subject you to an appropriate enforcement response. (1)

AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	Receiving Waters	U	Facility/Site	U	Self-Monitoring	N	Compliance Schedules
S	Effluent	U	Operation	S	Flow Measurement	N	Pretreatment
M	Permit	U	Maintenance	U	Laboratory	U	Effluent Limits Compliance
M	Collection System	M	Sludge	U	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

Receiving Waters:

S 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.

Comments:
The receiving stream was free of notable foam, algae or solids.

Effluent:

N 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.

Comments:
The effluent was clear and free of color at the time of the inspection.

Permit:

S 1. Did the facility have a current copy of the permit available for reference?

N 2. If the permit expires within 180 days, has a renewal application been submitted?

M 3. Receiving waters and Facility Description in the permit reflect actual conditions at the facility.

N 4. The permit has been properly transferred if there is a new owner.

Comments:
Permit was rated as marginal. The facility description lists an equalization tank that is not a part of the WWTP.

Collection System:

N 1. CSO's were found to be adequately monitored and maintained.

S 2. There were zero maintenance-related (clogged or blocked lines) overflow events in last 12 months.

S 3. There were zero hydraulic (I&I) overflow events in last 12 months.

N 4. Facility has met SSO and dry weather CSO reporting requirements

N 5. Any adverse impacts from SSO and CSO events have been properly mitigated.

N 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.

M 7. Collection system maintenance activities appeared to be adequate.

Comments:
The Collection System evaluation generated a marginal rating. The facility continues to suffer the effects of I/I in the collection system.

Facility/Site:

S 1. The facility was found to have standby power or equivalent provision.

S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility and lift stations.

S 3. Safe and adequate access was provided for inspection of all units and outfalls.

U 4. Facilities and equipment did not appear beyond their useful life.

5. List any safety concerns:

Comments:
Facility/Site was rated as unsatisfactory. The WWTP is in poor condition with corrosion obvious in several areas. This is a violation of 327 IAC 5-22-10 which requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant. Specifically, if the permittee plans to continue to operate this WWTP they must put a plan in place for replacement of the equipment.

Operation:

U 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including a report for an anticipated bypass report for steps of treatment taken out of service.

U 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:

a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
b. Adequate documentation of operational activities, including system monitoring and cleaning.
c. Adequate funding to ensure proper operation.

N 3. Solids handling procedures include.

a. Sufficient solids wasted from the treatment system, in a timely manner, to maintain process efficiency.
b. Wasting of solids based on appropriate operational targets and valid process control testing.
c. Adequate documentation of solids removal, handling, or control was available for review.

N 4. The facility was found to be operated efficiently during wet weather events.

Comments:
Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. As demonstrated by excessive effluent limit violations, the WWTP is not efficiently operated. Several inches of solids buildup was apparent in the chlorine contact tank. Clumps of sludge were floating in the clarifier. No air was present in the sludge holding tank. The owner indicated that the solids from this holding tank had been used to reseed the WWTP after solids washout. This is poor practice in general, but especially because the tank was without aeration.

Maintenance:

U 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.

U 2. Facility maintenance activities appeared to be adequate.

Comments:
Maintenance was rated as unsatisfactory due to an inadequate preventative maintenance program. This is a violation of Part II. B. 1 of the permit which requires all facilities to be operated and maintained as efficiently as

possible and in a manner which will minimize upsets and discharges of excessive pollutants. Inspector was unable to determine what maintenance was completed in the WWTP due to the lack of records. An air leak was present at an abandoned aerator at the edge of the polishing pond.

Sludge:

M 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

Comments:
Sludge Disposal was rated as marginal. No sludge from the sludge holding tank has been land applied in the last year. The permittee did remove approximately 224,000 gallons of material from the polishing ponds in November 2021. This material was land applied under permit INLA000699. The owner acknowledged receipt of a letter from IDEM Office of Land Quality indicating problems with reporting and not meeting E. coli limits.

Self-Monitoring:

S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
S 2. Flow-proportioned samples were found to be obtained where needed.
U 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.
S 4. Sample collection procedures, including automatic sampling, were found to include:
   a. Samples refrigerated during compositing.
   b. Proper preservation techniques used.
   c. Containers and holding times conformed to 40 CFR 136.3.
S 5. Sample documentation was found to be adequate and included:
   a. Dates, times, and locations of sampling.
   b. Name of individual performing sampling.
   c. Instantaneous flow for flow-weighted aliquots.
   d. Chain of Custody records.
N 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were found to be met.

Comments:
The Self Monitoring Program was rated as unsatisfactory for not monitoring final effluent at the frequency required by the permit. This is a violation of Part I. A. 1 of the permit which sets forth the effluent monitoring frequencies applicable to the discharge from Outfall 001. No samples were collected/analyzed for the week of October 11-17, 2021.

Flow Measurement:

S 1. Flow was found to be properly monitored as required by the permit.
S 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.
N 3. The stream flow gauging station is calibrated as often as necessary to provide accurate and reliable data, but at least once every 12 months.
N 4. A copy of the stream flow calibration curve or table is submitted to IDEM (OWQ Compliance Data Section) no later than October 1 of each year.

Comments:
The effluent flow meter was last calibrated on June 23, 2021 by Hurst Technical.

Laboratory:

The following laboratory records were reviewed:

TSS Bench Sheets	CBOD Bench Sheets	Ammonia Bench Sheets
E. coli Bench Sheets	pH Bench Sheets	D. O. Bench Sheets
Chlorine Bench Sheets		

N 1. The laboratory practices and protocol reviewed were adequate, including:
   a. A written laboratory QA/QC manual was available.
   b. Samples were found to be properly stored.
   c. Approved analytical methods were found to be used.
   d. Calibration and maintenance of instruments was found to be adequate.
   e. QA/QC procedures were found to be adequate.
   f. Dates of analyses (and times where required) were recorded.

g. Name of person performing analyses was recorded.

U 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Contract Lab Information

Landstrom Lab	Laurel

Comments:
The Laboratory evaluation generated an unsatisfactory rating.
Part I. B. 5 of the permit requires the analytical and sampling methods used to conform to the current version of 40 CFR, Part 136, unless otherwise specified. E. coli data for April, May, and June 2021 was determined to be falsified based on a lab inspection on July 1, 2021. Inspector was unable to determine validity of E. coli data for July, August, September, and October 2021. Permittee must submit information documenting where samples were analyzed and what equipment was used for analysis.
No bench sheets for any parameter were available for March and May 2021. No E. coli bench sheets were available for October 2021. This is a violation of Part I. B. 6 of the NPDES permit which requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of January 2021 to December 2021 were reviewed as part of the inspection.

U 1. All facility records for the period including the previous three years were available for review.
U 2. DMRs and MROs were found to be completed properly and accurately including:
a. "No Ex" column was accurate.
b. Signatory requirements were met.
c. Reports were prepared by or under the direction of a certified operator.
U 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:
The Records/Reports evaluation generated an unsatisfactory rating.

Part I. B. 3 of the permit requires the permittee to electronically submit monitoring reports no later than the 28th day of the month following each completed monitoring period. These reports shall include the Discharge Monitoring Report (DMR) and the Monthly Report of Operation (MRO). At the time of the inspection, it was determined you have not submitted records for January 2022. In addition reports for 10 of 12 months in 2021 were submitted late.

Part I. B. 8 of the permit requires the permittee to retain, for a minimum of three years, all records and information resulting from the monitoring activities required by the permit, including all records of analyses performed. In cases where the original records are kept at another location, a copy of all such records shall be kept at the permitted facility. At the time of the inspection, all DMRs and most MROs for 2021 were unavailable for review.

Part II. C. 4 of the permit requires the permittee to provide an explanation for each effluent limit violation in the comments section of the DMR. Effluent limit violations were reported in 10 of 12 months with no explanations.

The records submitted must also be accurate and complete. The April 2021 DMR was originally submitted without the accompanying MRO. When requested for a revision, the April 2020 MRO was submitted with only the year changed to 2021. This report must be revised and resubmitted. Many other errors in reporting have been made and IDEM staff have had to request (often multiple times) revisions to reports submitted for this permit.

Compliance Schedules:

N 1. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.
N 2. Agreed Order compliance milestones have been met.

Comments:
The facility is under Final Administrative Order on Consent signed by U.S. EPA with an effective date of January 28, 2022.

Pretreatment:

N 1. No evidence of interference from industrial or other sources of toxic substances was noted.
N 2. For both Delegated and Non-Delegated pretreatment programs:
a. Industrial or commercial dischargers were found to be regulated as required.
b. The permitee was found to enforce the Sewer Use Ordinance (SUO) and the Enforcement Response

Plan (ERP).

N 3. If the non-delegated permittee accepts hauled waste:

a. Does the POTW provide written permission to haulers?
b. Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
c. Does the POTW retain records of each load?

Comments:
The facility has no industrial sources.

Effluent Limits Compliance:

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of January 2021 to December 2021 were reviewed as part of the inspection.

Yes 2. Were violations noted during the review of DMRs?

Comments:
The Effluent Limits Compliance area was rated unsatisfactory due to self-reported violations of the limits detailed in Part I. A. of the NPDES Permit. Review of DMRs revealed the following: 31 Dissolved Oxygen violations, one pH violation, 22 Ammonia violations, two Chlorine Contact Tank violations, seven Chlorine Effluent violations, three TSS violations, and four TSS % Removal violations.

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Becky Ruark	bruark@idem.IN.gov	317-691-1909

Other staff participating in the inspection:

Name(s)	Phone Number(s)
Dean Maraldo (U.S. EPA)	

IDEM MANAGER REVIEW

IDEM Manager:	Date:
Lynn Raisor	3/4/2022

Pleasantview Utilities

3812 W Galaxy Drive, Connersville, IN 47331
(765) 309-2973

April 1, 2022

IN0044776
Fayette Co.

Jason House
Compliance an Enforcement Branch
Office of Water Quality
100 N Senate Ave
P.O. Box 6015
Indianapolis, IN 46206-6015

Re: Inspection Summary/Noncompliance Letter Response
Pleasantview Utilities WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

To Whom It May Concern:

In response to the letter dated March 4, 2022. The WWTP was rated as in poor condition, improvements are being made to the plant to make it run efficiently. Repairs have included replacement of air system and structural components of tank and walls. Evaluations are being made as to the next items to upgrade and will be done as needed. Long term, permittee plans to work towards abandoning the WWTP and pumping sewage to Connersville Utilities, Discussions with Connersville Utilities has begun.

Operations have improved as an additional employee has been hired to work at the WWTP. This employee is doing the required maintenance to make plant operate efficiently. The current operator has stated he was unable to continue. We are in the process of hiring a new operator, the new operator will correct all violations for labs and reports and make sure to operate the plant to avoid effluent limit violations.

Sincerely,

Matt Sherck
President, Pleasant View Utilities, Inc.
msherck@co.fayette.in.us

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue ● Indianapolis, IN 46204
(800) 451-6027 ● (317) 232-8603 ● www.idem.IN.gov

Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

May 02, 2024

Via Email to: msherck@co.fayette.in.us
Mr. Matt Sherck, Owner
Pleasantview Utilities
3812 W Galaxy Dr
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: **Inspection Summary/ Noncompliance Letter**
Pleasantview Utilities WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Office of Water Quality, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: April 29, 2024

Type of Inspection: Compliance Evaluation Inspection

Inspection Results: Violations were observed.

The following concerns were noted:

1. The facility is under Final Administrative Order on Consent signed by U.S. EPA with an effective date of January 28, 2022. This order was supposed to compel the permittee to bring this WWTP into compliance. As evidenced by the excessive effluent limit violations as well as other violations documented, the plant is not in compliance.

2. The Collection System evaluation generated an unsatisfactory rating.
   a. Part II. B. 2 of the permit prohibits overflows, pursuant to 327 IAC 5-2-8(11). A records review indicates an overflow occurred on 21 consecutive days during the last 12 months. This maintenance related overflow was eventually stopped and the line was repaired.
   b. The highly variable flow at the WWTP demonstrates an issue with I/I in the collection system. This is a violation of Part II. B. 1 of the permit which requires all facilities to be maintained in good working order at all times and operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. This includes the facility's collection system.

3. Facility/Site was rated as unsatisfactory.
   a. The WWTP is in poor condition with corrosion obvious in several areas. This is a violation of 327 IAC 5-22-10 which requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant. Specifically, if the permittee plans to continue to operate this WWTP they must put a plan in place for replacement of the equipment.
   b. There is a generator on premises, but the operator was unable to determine if it is functional and ready for use in case of a power outage. The generator should be tested regularly to ensure it is ready for use in an emergency. Checks should be documented.
   c. A Missions alarm system was present, but the operator was unable to confirm that it was functional at the time of the inspection.

4. Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. At the time of the inspection the chlorine contact tank was full of duckweed and sludge. The surface of the clarifier is was covered in floating sludge and debris. The polishing ponds appeared to have an excessive amount of solids present. All of these are most likely contributing to the excessive number of effluent limit violations reported. Effluent limit violations were reported in 11 of the last 12 months reviewed.

5. The Self Monitoring Program was rated as unsatisfactory. Based on the on-site documentation, inspector was unable to determine if the permittee was flow proportioning the effluent composite samples. This is a violation of Part I. B. 4. b. (4) of the permit, which defines the 24-hour flow proportioned composite sample.

6. Flow Measurement was rated as unsatisfactory.
   a. The flow values reported on the MRO and DMR appear to be inaccurate. In the last week of January 2024 for example, the reported average flow was 380 gallons per day. This does not seem feasible for a subdivision the size covered by this utility. The sewer ban coordinator has also reached out to the operator requesting correction of flows for August 2023. The operator must assure that he is accurately reporting flow values each month. If submitted data is determined to be inaccurate, the operator must revise and correct the monthly reports.
   b. In addition at the time of this inspection all flow data is inaccurate since a large portion of the flow was being discharged out the old outfall and therefore not being measured.

7. The Laboratory evaluation generated an unsatisfactory rating. At the time of the inspection, it was determined the chlorine bench sheet was inadequate. This is a violation of Part I. B. 6 of the NPDES permit which requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit.

a. Specifically, the chlorine bench sheets are lacking sample and analysis times.
b. They are also virtually unreadable since the data is just added to the margin of the DO bench sheet.
c. In addition the chlorine bench sheet and data submitted on the MRO included effluent chlorine as 0.00 mg/L. The lowest value to be reported should be the detection limit of the chlorine meter (usually 0.02 mg/L).

8. The Records/Reports evaluation generated an unsatisfactory rating.
   a. Part I. B. 3 of the permit requires the permittee to submit monitoring reports no later than the 28th day of the month following each completed monitoring period. These reports shall include the Discharge Monitoring Report (DMR) and the Monthly Report of Operation (MRO). These reports must be accurately completed. Most of the DMRs have an incorrect number entered for in the No. EX column. This column is supposed to indicate the number of violations of effluent limits for each parameter. The certified operator must accurately count each time that the weekly limits, monthly average limits or daily limits (where applicable) are exceeded. The total for each parameter must be entered in the No. EX box before submittal.
   b. Part II. B. 2. b. (2) of the permit requires reporting bypass of treatment. A bypass of treatment was occurring at the time of the inspection and it had not been reported as required.
   c. Part I. B. 8 of the permit requires the permittee to retain, for a minimum of three years, all records and information resulting from the monitoring activities required by the permit, including all records of analyses performed. In cases where the original records are kept at another location, a copy of all such records shall be kept at the permitted facility. At the time of the inspection, the February and March 2024 records were unavailable for review.

9. The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
April	2023	001	Ammonia Nitrogen	7
May	2023	001	Ammonia Nitrogen	2
May	2023	001	Chlorine	1
June	2023	001	Dissolved Oxygen	1
July	2023	001	Ammonia Nitrogen	5
August	2023	001	Dissolved Oxygen	5
August	2023	001	Ammonia Nitrogen	9
September	2023	001	Dissolved Oxygen	4
September	2023	001	Ammonia Nitrogen	10
October	2023	001	Dissolved Oxygen	6
October	2023	001	TSS	2

October	2023	001	Ammonia Nitrogen	5
October	2023	001	Chlorine	1
November	2023	001	Dissolved Oxygen	6
November	2023	001	Ammonia Nitrogen	11
December	2023	001	Ammonia Nitrogen	5
January	2024	001	Ammonia Nitrogen	3
March	2024	001	Ammonia Nitrogen	7

10. The Other: Bypass of Treatment area was evaluated as unsatisfactory. Part II. B. 2 of the permit prohibits bypass of treatment. At the time of the inspection, the discharge pipe from the polishing pond had been modified. This modification caused flow to be released through the old outfall. This flow was bypassing disinfection and post aeration as well as flow measurement. This appears to have been occurring for several days. This bypass of treatment must be stopped as soon as possible.

Part II. A. 1. of your permit requires you to comply with its terms and conditions. Any noncompliance with the terms of your permit may subject you to an enforcement action which can include the imposition of penalties. You are required to immediately take all necessary measures to comply with the terms and conditions of your NPDES Permit, specifically those violations identified above.

Within 30 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in formal enforcement action. Please direct your response to this letter to our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Becky Ruark at 317-691-1909 or by email to bruark@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure

NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number:	Facility Type:		Facility Classification:	TEMPO AI ID
IN0044776	Mixed Ownership	Minor	I	

Date(s) of Inspection:	April 29, 2024
Type of Inspection:	Compliance Evaluation Inspection

Name and Location of Facility Inspected:			Receiving Waters:	Permit Expiration Date:
Pleasantview Utilities WWTP				10/31/2026
3812 W Galaxv Dr		County:	Tributary to Williams Creek	Design Flow:
Connersville	IN 47331	Fayette		0.06MGD

On Site Representative(s):

First Name	Last Name	Title	Email	Phone
Eric	Schlechtweg	Operator	e.rock@dswaterservices.com	

Was a verbal summary of findings presented to the on-site representative? **Yes**

Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:
Les Day	21226	IV	9-14-21	6-30-24	les.day@dswaterservices.com

Cyber Security Contact:

Name: Email:

Responsible Official:		
Mr. Matt Sherck, Owner	Permittee: Pleasantview Utilities	
3812 W Galaxy Dr	Email: msherck@co.fayette.in.us	
	Phone:	Contacted?
Connersville, Indiana 47331	Fax:	No

INSPECTION FINDINGS

- ○ Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- ○ Violations were discovered but corrected during the inspection. (4)
- ○ Potential problems were discovered or observed. (3)
- ◉ Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- ○ Violations were discovered and may subject you to an appropriate enforcement response. (1)

AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

S	Receiving Waters	U	Facility/Site	U	Self-Monitoring	U	Enforcement
S	Effluent	U	Operation	U	Flow Measurement	N	Pretreatment
S	Permit	S	Maintenance	U	Laboratory	U	Effluent Limits Compliance
U	Collection System	S	Sludge Disposal	U	Records/Reports	U	Other: Bypass of Treatment

DETAILED AREA EVALUATIONS

Receiving Waters:

S 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.

Comments:
The receiving stream was free of notable foam, algae or solids.

Effluent:

S 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.

Comments:
The effluent was clear and free of color at the time of the inspection.

Permit:

S 1. Did the facility have a current copy of the permit available for reference?

N 2. If the permit expires within 180 days, has a renewal application been submitted?

S 3. Receiving waters and Facility Description in the permit reflect actual conditions at the facility.

N 4. The permit has been properly transferred if there is a new owner.
N 5. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

Comments:
The facility was found to have a valid permit and the facility description, including units of treatment and receiving stream, is accurate.

Collection System:

N 1. CSO's were found to be adequately monitored and maintained.
U 2. There were 21 maintenance-related (clogged or blocked lines) overflow events in last 12 months.
S 3. There were no reported hydraulic (I&I) overflow events in last 12 months.
N 4. Facility has met SSO and dry weather CSO reporting requirements
N 5. Any adverse impacts from SSO and CSO events have been properly mitigated.
N 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.
U 7. Collection system maintenance activities appeared to be adequate.

Comments:
The Collection System evaluation generated an unsatisfactory rating. Part II. B. 2 of the permit prohibits overflows, pursuant to 327 IAC 5-2-8(11). A records review indicates an overflow occurred on 21 consecutive days during the last 12 months. This maintenance related overflow was eventually stopped and the line was repaired. The highly variable flow at the WWTP demonstrates an issue with I/I in the collection system. This is a violation of Part II. B. 1 of the permit which requires all facilities to be maintained in good working order at all times and operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. This includes the facility's collection system.

Facility/Site:

M 1. The facility was found to have standby power or equivalent provision.
M 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility and lift stations.
S 3. Safe and adequate access was provided for inspection of all units and outfalls.
U 4. Facilities and equipment did not appear beyond their useful life.
5. List any safety concerns:

Comments:
Facility/Site was rated as unsatisfactory. The WWTP is in poor condition with corrosion obvious in several areas. This is a violation of 327 IAC 5-22-10 which requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant. Specifically, if the permittee plans to continue to operate this WWTP they must put a plan in place for replacement of the equipment. There is a generator on premises, but the operator was unable to determine if it is functional and ready for use in case of a power outage. The generator should be tested regularly to assure it is ready for use in an emergency. Checks should be documented. A Missions alarm system was present, but the operator was unable to confirm that it was functional at the time of the inspection.

Operation:

U 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including a report for an anticipated bypass report for steps of treatment taken out of service.
S 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:
   a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
   b. Adequate documentation of operational activities, including system monitoring and cleaning.
   c. Adequate funding to ensure proper operation.
U 3. Solids handling procedures include.
   a. Sufficient solids wasted from the treatment system, in a timely manner, to maintain process efficiency.
   b. Wasting of solids based on appropriate operational targets and valid process control testing.
   c. Adequate documentation of solids removal, handling, or control was available for review.
N 4. The facility was found to be operated efficiently during wet weather events.

Comments:
Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. At the time of the inspection, the chlorine contact tank was full of duckweed and sludge. The surface of the clarifier is was covered in floating sludge and debris. The polishing ponds

appeared to have an excessive amount of solids present. All of these are most likely contributing to the excessive number of effluent limit violations reported. Effluent limit violations were reported in 11 of the last 12 months reviewed.

Maintenance:

S 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.

S 2. Facility maintenance activities appeared to be adequate.

Comments:
Maintenance activities are documented. The permittee recently replaced the diffusors in the aeration tank.

Sludge Disposal:

S 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

Comments:
Sludge is land applied under INLA000699. In May 2023 approximately 13.4 dry tons were land applied.

Self-Monitoring:

U 1. Samples were found to be taken at pre-designated locations and were found to be representative.

U 2. Flow-proportioned samples were found to be obtained where needed.

U 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.

N 4. Sample collection procedures, including automatic sampling, were found to include:
- a. Samples refrigerated during compositing.
- b. Proper preservation techniques used.
- c. Containers and holding times conformed to 40 CFR 136.3.

U 5. Sample documentation was found to be adequate and included:
- a. Dates, times, and locations of sampling.
- b. Name of individual performing sampling.
- c. Instantaneous flow for flow-weighted aliquots.
- d. Chain of Custody records.

N 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were found to be met.

Comments:
The Self Monitoring Program was rated as unsatisfactory. Based on the on-site documentation, inspector was unable to determine if the permittee was flow proportioning the effluent composite samples. This is a violation of Part I. B. 4. b. (4) of the permit, which defines the 24-hour flow proportioned composite sample.

Flow Measurement:

U 1. Flow was found to be properly monitored as required by the permit.

S 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.

N 3. The stream flow gauging station is calibrated as often as necessary to provide accurate and reliable data, but at least once every 12 months.

N 4. A copy of the stream flow calibration curve or table is submitted to IDEM (OWQ Compliance Data Section) no later than October 1 of each year.

Comments:
Flow Measurement was rated as unsatisfactory. The flow values reported on the MRO and DMR appear to be inaccurate. In the last week of January 2024 for example, the reported average flow was 380 gallons per day. This does not seem feasible for a subdivision the size covered by this utility. The sewer ban coordinator has also reached out to the operator requesting correction of flows for August 2023. The operator must ensure that he is accurately reporting flow values each month. If submitted data is determined to be inaccurate, the operator must revise and correct the monthly reports.
In addition at the time of this inspection, all flow data is inaccurate since a large portion of the flow was being discharged out the old outfall and therefore not being measured.

The effluent flow meter was calibrated on May 16, 2023 by Gripp Inc.

Laboratory:

N 1. The laboratory practices and protocol reviewed were adequate, including:
- a. A written laboratory QA/QC manual was available.
- b. Samples were found to be properly stored.

c. Approved analytical methods were found to be used.
d. Calibration and maintenance of instruments was found to be adequate.
e. QA/QC procedures were found to be adequate.
f. Dates of analyses (and times where required) were recorded.
g. Name of person performing analyses was recorded.

U 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Contract Lab Information

D&S Lab	Oldenburg

Comments:
The Laboratory evaluation generated an unsatisfactory rating. At the time of the inspection, it was determined that the chlorine bench sheet was inadequate. This is a violation of Part I. B. 6 of the NPDES permit which requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit. Specifically, the chlorine bench sheets are lacking sample and analysis times. They are also virtually unreadable since the data is just added to the margin of the DO bench sheet. In addition the chlorine bench sheet and data submitted on the MRO included effluent chlorine as 0.00 mg/L. The lowest value to be reported should be the detection limit of the chlorine meter (usually 0.02 mg/L).

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of April 2023 to March 2024 were reviewed as part of the inspection.

U 1. All facility records for the period including the previous three years were available for review.
U 2. DMRs and MROs were found to be completed properly and accurately including:
a. "No Ex" column was accurate.
b. Signatory requirements were met.
c. Reports were prepared by or under the direction of a certified operator.
U 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:
The Records/Reports evaluation generated an unsatisfactory rating.
Part I. B. 3 of the permit requires the permittee to submit monitoring reports no later than the 28th day of the month following each completed monitoring period. These reports shall include the Discharge Monitoring Report (DMR) and the Monthly Report of Operation (MRO). These reports must be accurately completed. Most of the DMRs have an incorrect number entered for in the No. EX column. This column is supposed to indicate the number of violations of effluent limits for each parameter. The certified operator must accurately count each time that the weekly limits, monthly average limits or daily limits (where applicable) are exceeded. The total for each parameter must be entered in the No. EX box before submittal.
Part II. B. 2. b. (2) of the permit requires reporting bypass of treatment. A bypass of treatment was occurring at the time of the inspection and it had not been reported as required.
Part I. B. 8 of the permit requires the permittee to retain, for a minimum of three years, all records and information resulting from the monitoring activities required by the permit, including all records of analyses performed. In cases where the original records are kept at another location, a copy of all such records shall be kept at the permitted facility. At the time of the inspection, the February and March 2024 records were unavailable for review.

Enforcement:

U 1. Agreed Order and/or Compliance Plan milestones have been met.

Comments:
The facility is under Final Administrative Order on Consent signed by U.S. EPA with an effective date of January 28, 2022. This order was supposed to compel the permittee to bring this WWTP into compliance. As evidenced by the excessive effluent limit violations as well as other violations documented, the plant is not in compliance.

Pretreatment:

N 1. No evidence of interference from industrial or other sources of toxic substances was noted.
N 2. For both Delegated and Non-Delegated pretreatment programs:
a. Industrial or commercial dischargers were found to be regulated as required.
b. The permitee was found to enforce the Sewer Use Ordinance (SUO) and the Enforcement Response Plan (ERP).
N 3. If the non-delegated permittee accepts hauled waste:
a. Does the POTW provide written permission to haulers?
b. Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
c. Does the POTW retain records of each load?

Comments:
The facility has no industrial sources.

Effluent Limits Compliance:

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of April 2023 to March 2024 were reviewed as part of the inspection.

Yes 2. Were violations noted during the review of DMRs?

The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
April	2023	001	Ammonia Nitrogen	7
May	2023	001	Ammonia Nitrogen	2
May	2023	001	Chlorine	1
June	2023	001	Dissolved Oxygen	1
July	2023	001	Ammonia Nitrogen	5
August	2023	001	Dissolved Oxygen	5
August	2023	001	Ammonia Nitrogen	9
September	2023	001	Dissolved Oxygen	4
September	2023	001	Ammonia Nitrogen	10
October	2023	001	Dissolved Oxygen	6
October	2023	001	TSS	2
October	2023	001	Ammonia Nitrogen	5
October	2023	001	Chlorine	1
November	2023	001	Dissolved Oxygen	6
November	2023	001	Ammonia Nitrogen	11
December	2023	001	Ammonia Nitrogen	5
January	2024	001	Ammonia Nitrogen	3
March	2024	001	Ammonia Nitrogen	7

Comments:

Other:

Bypass of Treatment

Comments:
The Other: Bypass of Treatment area was evaluated as unsatisfactory. Part II. B. 2 of the permit prohibits bypass of treatment. At the time of the inspection, the discharge pipe from the polishing pond had been modified. This modification caused flow to be released through the old outfall. This flow was bypassing disinfection and post aeration as well as flow measurement. This appears to have been occurring for several days. This bypass of treatment must be stopped as soon as possible.

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Becky Ruark	bruark@idem.IN.gov	317-691-1909

IDEM MANAGER REVIEW

IDEM Manager:	Date:
Kim Rohr	5/2/2024

IN0044776
Fayette Co.

Pleasantview Utilities

3812 W Galaxy Drive, Connersville, IN 47331
(765) 309-2973

File properties indicate Matt Sherck created this response letter on 05/15/2024 not 09/01/2022. It appears Matt Sherck revised an earlier 09/01/2022 response letter but failed to change the date.

May 15, 2024

September 1, 2022

Kim Rohr
Chief, Wastewater Inspection Section
Office of Water Quality
100 N Senate Ave
P.O. Box 6015
Indianapolis, IN 46206-6015

Re: Inspection Summary/Noncompliance Letter Response
Pleasantview Utilities WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

To Whom It May Concern:

In response to the letter dated May 2, 2024. Repairs were made immediately to correct problems found on inspection. Video and picture attached to email. The elbow on old discharge line developed a crack and was repaired. The contact tank was cleaned and the aeration was upgraded to increase oxygen levels. Regular cleaning of debris in lines will regulate the flow. The report cited that the operator did not know how to operate generator. It is functional and recently tested. A battery maintainer was added last year to ensure that it is always charged and ready to start. The Mission alarm system also functions and sends alarms to Josh. The plant is old and upgrades and repairs are being made to keep it operating. Recent upgrades were made to improve aeration to the mixing tank. The skimmer is cleared regularly. A contractor has been hired to begin cleaning ponds by using a sludge removal container. Operator Les Day is tasked with correcting reporting and testing violations.

Sincerely,

Matt Sherck
President, Pleasant View Utilities, Inc.
msherck@co.fayette.in.us

Pleasantview Utilities

3812 W Galaxy Drive, Connersville, IN 47331
(765) 309-2973

File properties indicate Matt Sherck created this response letter on 10/08/2024 not 09/01/2022. It appears Matt Sherck revised an earlier 09/01/2022 response letter but failed to change the date.

October 8, 2024

September 1, 2022

Kim Rohr
Chief, Wastewater Inspection Section
Office of Water Quality
100 N Senate Ave
P.O. Box 6015
Indianapolis, IN 46206-6015

Re: Inspection Summary/Noncompliance Letter Response
Pleasantview Utilities WWTP
NPDES Permit No. IN0044776
Connersville, Fayette County

To Whom It May Concern:

In response to the letter dated May 2, 2024.

1. We have made multiple changes in attempt to be in compliance. The latest include additional aeration in mix tank and contact tank in an effort to eliminate effluent violations. Better communication with operator will also help.
2. Overflow was not in collection system and repaired immediately when reported to the utility. Steps were taken to replace sections of line that contributed to back-up. Any known problems with collection system are repaired in a timely mannor.
3. Plant is operated in as efficient manor as possible for its age, repairs are regularly made to improve performance. A rate increase is being sought now to increase funds for equipment replacement. The generator on site works, work sheets show maintenance recently done by adding new battery maintainer and test running. Myself and Josh Landstrom perform these test. Myself and Josh receive the reports for alarm system. The operator does not respond for power or flow problems.
4. The clarifier was cleaned immediately following inspection and will be maintained in this condition. The ponds were cleaned out in 2023, copy of info provided to Becky Ruark as requested, and field spread, options for possible bag system for sludge removal are being considered or field spread fall with land app permit.
5. 7 & 8. Operator to correct. Was unaware of operator not completing properly, I rely on this being done as required by permit and pay the Operator to comply. Will review with operator.
6. Flow fluctuated due to debris in line caused by elbow on inlet. This was removed and the discharge at outfall found during inspection due to a crack in pipe was repaired.
7. See 5
8. See 5
9. Upgrades to plant with Airation done to eliminate violations
10. An elbow was added to discharge pipe in an effort to eliminate duck weed, it did not contribute to flow at the old outflow. The elbow was removed as requested.

Sincerely, Matt Sherck

President, Pleasant View Utilities, Inc.
msherck@co.fayette.in.us

Indiana Office of Utility Consumer Counselor
OUCC
115 West Washington Street, Suite 1500 South,
Indianapolis, Indiana 46204
Toll-Free: 1.888.441.2494 • Fax: 317.232.5923
Web: www.IN.gov/OUCC

The State Agency Representing Hoosier Utility Ratepayers

November 15, 2024

VIA ELECTRONIC MAIL
Matthew Sherck, President
PLEASANTVIEW UTILITIES INC.
3812 West Galaxy Drive
Connersville, Indiana 47331
Email: msherck@co.fayette.in.us

Re: IURC Cause No. 46122-U
Pleasantview Utilities Inc. (Wastewater)
OUCC Data Request Set No. 5

Dear Mr. Sherck:

In accordance with 170 IAC 1-1.1-16, please provide a response to the requests attached by email by November 25, 2024 to vipeters@oucc.in.gov, dlevay@oucc.in.gov,and infomgt@oucc.in.gov.

If you have any questions, please contact me. Thank you.

Sincerely,

Victor Peters
Deputy Consumer Counselor

VP/tab
Enclosure

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

DATA REQUEST

CAUSE NO. 46122-U

OUCC Data Request Set No. 5 **Date: November 15, 2024**

In connection with our work in the above-referenced Cause, we are submitting the following request(s) for information or documentation. Please identify the person(s) providing each segment of information or each document. Also, please indicate the witness or witnesses to be called in your Case-in-Chief and Rebuttal who can answer questions regarding the substance of or origination of information supplied by the utility in each instance of the responses to this request. Thank you for your prompt assistance in this matter.

I. Definitions and Instructions.

A. For each data request, please identify all persons who provided responsive information or materials. Matt Sherck

B. With respect to any document or thing being withheld from production on the basis of privilege, please state the subject matter of the document and the basis of the claim of privilege.

II. Data Request

Q-5-1: Please provide a copy of the current sewer map. attached

Q-5-2: Please provide the current inventory of gravity sewer assets which identifies the length, diameters and pipe materials (e.g. PVC, vitrified clay pipe, etc.) of the sewers and the number of manholes, their depth, diameters and wall materials. The lines are clay on east side of 35 e, pvc on west side, 8", manholes are concrete. Most lines 4-5' depth, 2 areas up to 20' manholes and line listed on attached maps

Q-5-3: Please indicate the sewer main length in feet cleaned by year for 2020 to 2024. Have used Connersville utilities 17 times, they clean up to 300' each time.

Q-5-4: Please indicate the sewer main length in feet televised by year for 2020 to 2024. 200 ft

Q-5-5: Please provide copies of all manhole inspection reports from 2020 to 2024. No reports

Q-5-6: Has Applicant conducted any sewer studies in the last five years to determine the cause of excessive infiltration and inflow in the sewer system? If so, please provide a copy of the sewer studies. No

Q-5-7: If no sewer studies have been conducted, please explain what plans Applicant has to identify and remove the sources of excessive infiltration and inflow in the sewer system. Examine manholes and monitor lines whenever doing work to system

Q-5-8: Are sump pumps, downspouts, foundation drains, and area drains from residential homes connected to the sanitary sewer system? They are suspected to be but unkown locations

Q-5-9: Please state how many sanitary sewer overflows ("SSOs") have occurred in the sewer system by year for 2020 to 2024. Please also provide copies of the Bypass/Overflow Incident reports sent to IDEM for each SSO. 1, attached

Q-5-10: Please state how many bypasses have occurred at the wastewater treatment plant by year for 2020 to 2024. Please also provide copies of the Bypass/Overflow Incident reports sent to IDEM for each wastewater treatment plant bypass. 0

Q-5-11: Please provide a copy of the Asset Management Plan. No additional plan to attach

Q-5-12: Please describe how waste activated sludge is removed from the aeration tanks, stored, and handled prior to land application. Please include a flow schematic showing the movement of waste sludge between all process tanks, storage tanks and polishing ponds. Flow is shown on attached schematic. "Sludge" or solids is maintained in plant and when levels get high, wasted into sludge holding tank. Solids also due to flow end up in polishing ponds where they can also be removed and land applied.

Q-5-13: The Treatment Facility Description in Applicant's NPDES permit is as follows:

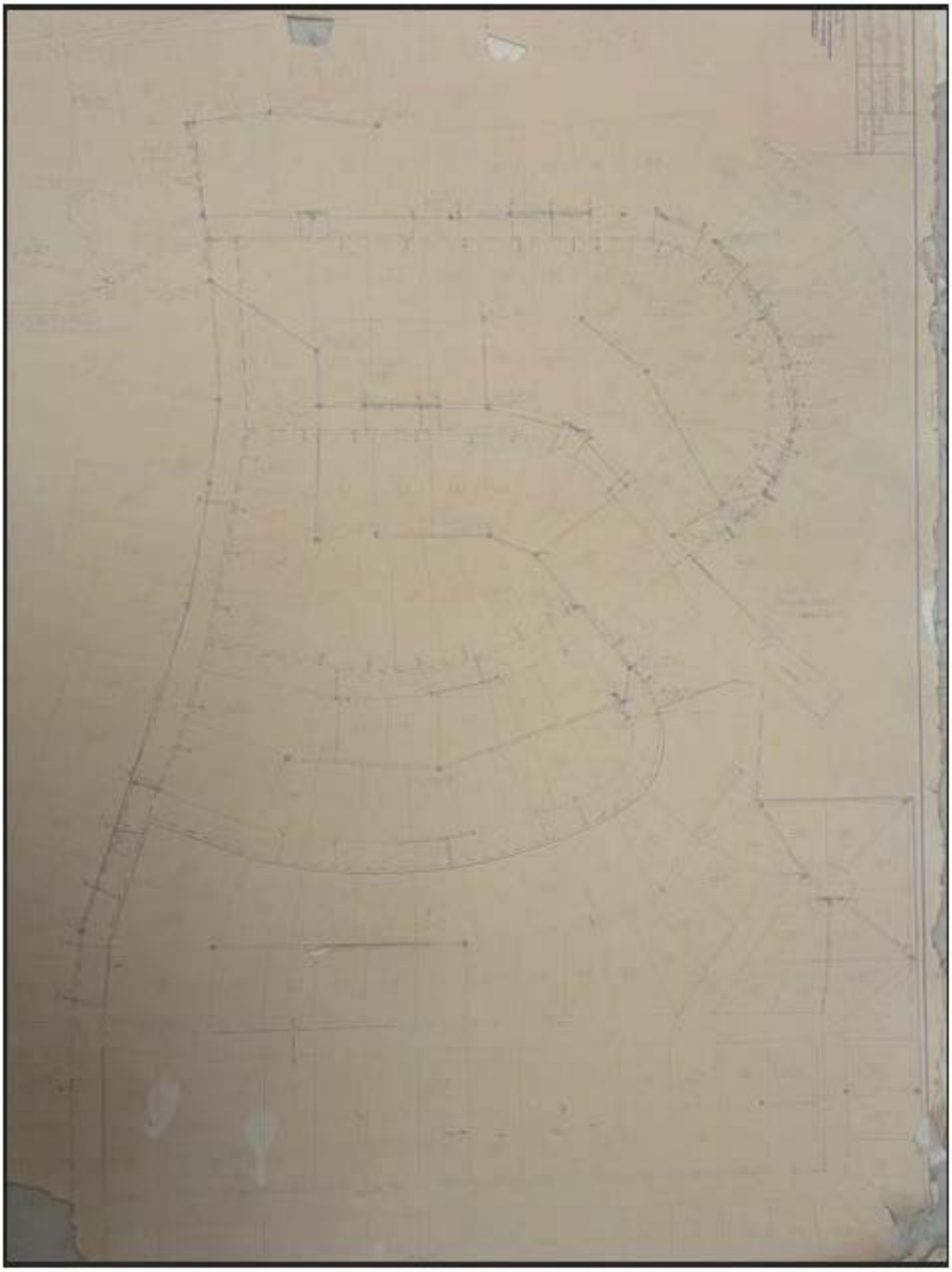
> The permittee currently operates a Class I, 0.06 MGD extended aeration treatment facility consisting of a manual bar screen, an equalization tank, a secondary clarifier, two (2) polishing ponds, chlorine disinfection, an effluent flow meter, and post aeration. Sludge is held in an aerated holding tank and is either land applied or landfilled.

Please provide a treatment plant layout showing the location of the aerated sludge holding tank. Please also indicate the dimensions of this tank and its volume in gallons. PV SEWER PLANT SCHEMATIC.png the tank is ~20'x8'x10'

Q-5-14: In response to DR 3-7, Applicant indicated that AMM services, Greg Amos and Jeff Amos do the sludge removal for Pleasantview. Please state from which tanks and ponds sludges are removed for land application. Sludge removal done from both ponds, the ponds allow for sediment to settle and this is removed. The sludge in holding tank on plant is also removed at same time

Q-5-15: Please describe how sludge is removed from the treatment facilities by AMM Services, Greg Amos and Jeff Amos including a description of equipment used to remove and land apply the sludge such as slurry pumps, other pumps, excavators, sludge hauling vehicles, and sludge applicators. If the sludge is slurried for removal, please indicate the source of the slurry water. Ponds are stirrated using impeller pump, same pump is used to load applications wagon which is haled to field by tractor and injected as required by land app permit. No extra water is added.

Q-5-16: Please identify the volume of sludge in gallons that were land applied annually by year for each year from 2017 to 2024. Please also indicate the dry tons of sludge land applied annually by year for the same years. attached



BYPASS / OVERFLOW INCIDENT REPORT

State Form 48373 (R8 / 2-19)
Indiana Department of Environmental Management
Office of Water Quality

☐ Follow-up report to previously sent on: _____

INSTRUCTIONS: *Complete all parts of this form and e-mail signed copies to wwreports@idem.IN.gov. Submittal of this report will satisfy the Office of Water Quality (OWQ) telephone and written bypass/overflow reporting requirements of your NPDES permit. Please use and the second page of this form as necessary to identify* ***separate locations caused by the same event.*** *If you have any questions while filling out this form, please call (317) 232-6770.*

To report a spill or if the release is resulting in a fish kill or other severe environmental damage, immediately report the release to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

GENERAL INFORMATION

(1) Facility Name *(Organization)*	(2) Mailing Address *(reporting organization)*	(3) County	(4) NPDES Permit
Pleasantview Utilities	3812 W Galaxy Drive	Fayette	IN LA 000699

RELEASE INFORMATION (Location 1)

(5) Outfall Number	(6) Date *(mm/dd/yy)* and Time Release Began		(7) Date *(mm/dd/yy)* and Time Release Stopped		(8) Location of Release *(streets address or Manhole, Lift Station, Force Main etc.)*	(9) Latitude *(Deg Min Sec)*	(9) Longitude *(Deg Min Sec)*
	11/30/23	☑ AM ☐ PM	12/20/21 1:00	☑ AM ☐ PM	Manhole, Co Rd 350 E	N 39.6306814	W 85.2049429

(10) Amount of Flow Released *(Always provide a volume.)*
Check one: ☑ Estimated ☐ Actual 2500 Gallons

(11) WWTP Flow During Release .03 MGD

(12) WWTP Peak Design Flow Rate 1.1 MGD

(13) Overflow Type *(Select one.)*
- ☑ Sanitary Sewer Overflow
- ☐ Treatment Bypass *(at wastewater plant)*
- ☐ Prohibited Combined Sewer Overflow
- ☐ Dry Weather Combined Sewer Overflow
- ☐ Combined Sewer System Release

(14) Describe any damage to aquatic life or receiving stream:

No damage to aquatic life, overflow remained in ditch line, did not go to stream

(15) Reason for Bypass / Overflow *(Select one or more.)*
☐ Construction Related ☐ Power Failure ☐ Equipment Failure ☑ Unknown ☐ Exceeded Max Capacity ☐ Precipitation Inches

(16) System Component(s) *(Select one or more.)*
- ☑ Manhole
- ☐ House Lateral
- ☐ Pipe Failure
- ☐ Pump Station Failure
- ☐ Treatment Bypassed
- ☐ Other
- ☐ Influent Structure
- ☐ Air Relief Valve
- ☐ Sewer Clean Out

Describe Other: *(in the box below)*

(17) Additional Description of the Bypass / Overflow Event:

First aware of blockage 11/30/23, contractor jeted line and opened, 12/6/23 line blocked again, jet would not open. Called in locate and dug by manhole, found crushed line and replaced. 12/19/23 line not flowing, dug up and checked line further North of manhole.

(18) Description of the Area Impacted *(Check all that apply.)*
- ☑ Affected Private Property
- ☐ Basement Backup
- ☐ Occurred at Treatment Plant
- ☐ Reached Public Land
- ☐ Reached Receiving Water

Name of Receiving Water Impacted:

(19) Additional organizations notified by facility, if necessary *(Select one or more.)*
☐ IDEM Emergency Response ☑ Health Department ☐ DNR Fish and Wildlife ☐ Local Emergency Management ☐ Other:

(20) Actions Taken to Prevent, Minimize, or Mitigate Damage including Clean-up and Treatment of Affected Area
(Select one or more of the following, then add a written description.)
☑ Removed Blockage ☑ Repaired Pipe ☐ Repaired Pump Station ☐ Other ☑ Lime ☐ Clean-Up Debris

(21) Resolution: Actions Taken or Planned to Prevent Recurrence

Line repaired

(22)

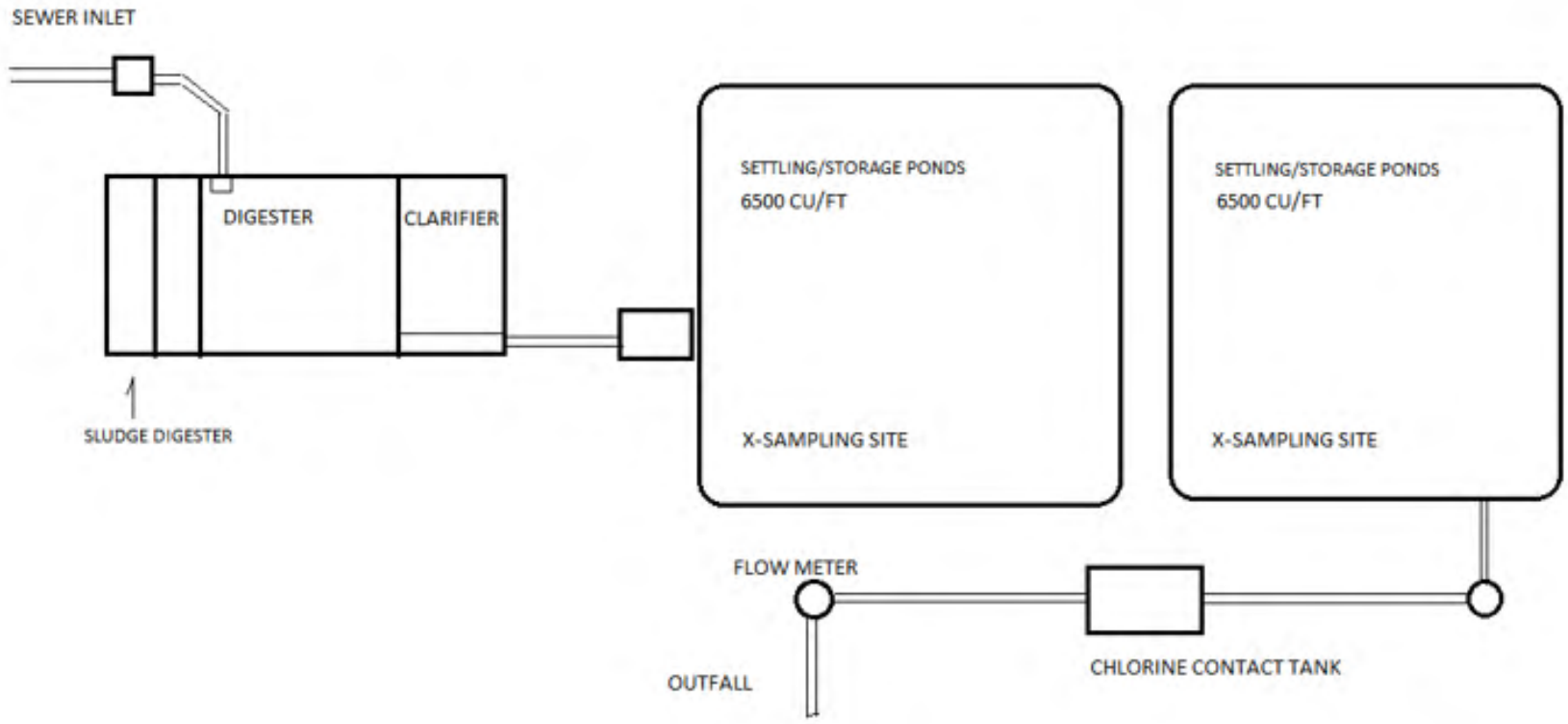
CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. *(The area below is for a handwritten signature or an electronic substitute. Scan the completed form to PDF and e-mail to wwReports@idem.IN.gov)*

SIGNATURE: Matt Sherck DATE *(month, day, year)*: 12/21/2023

Individual Making Report *(printed)*	Telephone Number	Contact E-mail	Date *(month, day, year)* / Time IDEM Notified	
Matt Sherck	(765) 309-2973	mattsherck@gmail.com	12/20/23 3:54	☐ AM ☑ PM

Pleasantview Utilities LLC
Cause No. 46122-U
Response to DR 5-13
11/20/2024



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Indiana Department of Environmental Management

Solid Waste Permits Section - Office of Land Quality

Land Application Site Activity Report - Biosolids and Industrial Waste Products

>>Complete and submit this form to IDEM for each application site used during a report month<<

Month:	November	**Year:**	2021	Place "X" below if first use of site by this permittee	
Permittee:	Pleasantview Utilities, Inc	**Site ID:**	Pleasant		
L.A. Permit No. IN LA:	699	**Acres Available:**	13.82		
Type of Material Applied This Month:		**Acres Used This Month:**	13.82		

Types of Material: 1 = Anaerobically Digested Biosolids, 2 = Aerobically Digested Biosolids, 3 = Industrial Waste Product

Loading Data: Date:	Dry Tons Applied	% Total Solids	Acres Used	Method Used* 1, 2, or 3	Metal Analysis 1 or 2	Nutrient Analysis 1 or 2
1						
2						
3						
4						
5						
6						
7						
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9						
10						
11						
12	16.66	0.30	13.82	2	2	2
13						
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23						
24						
25						
26						
27						
28						
29						
30						
31						

*Methods of Application: 1 = Surface, 2 = Injection, 3 = Incorporation

Lab Data: DO NOT USE < IF NOT DETECTED

Heavy Metal Analysis: ENTER DETECTION LIMIT!

ANALYSIS #		1	2	
Sample Report Date		10/27/21	20/27/2021	
% Total Solids		22.90	22.90	
Arsenic	(As)	1.22	5.34	mg/kg dry wt.
Cadmium	(Cd)	0.13	0.57	mg/kg dry wt.
Copper	(Cu)	36.70	160.00	mg/kg dry wt.
Lead	(Pb)	2.25	9.84	mg/kg dry wt.
Mercury	(Hg)	0.03	0.12	mg/kg dry wt.
Molybdenum	(Mo)	0.62	2.69	mg/kg dry wt.
Nickel	(Ni)	3.14	13.70	mg/kg dry wt.
Selenium	(Se)	0.05	0.22	mg/kg dry wt.
Zinc	(Zn)	56.30	246.00	mg/kg dry wt.

Nutrient Analysis: DO NOT USE < IF NOT DETECTED ENTER DETECTION LIMIT!

ANALYSIS #		1	2	
% Total Solids		22.90	22.90	
Total N	(TN)	3745.00	0.09	% dry wt.
Ammonium N	(NH4-N)	95.20	0.04	% dry wt.
Nitrate N	(NO3-N)	30.80	0.01	% dry wt.
Phosphorus	(P)	924.00	0.40	% dry wt.
Potassium	(K)	344.00	0.15	% dry wt.

Other Analysis:

ANALYSIS #	1	2	
PCB	0.01	0.04	mg/kg dry wt.
Other			
Other			

What is the projected crop(s) for which the above application(s) was intended to fertilize? corn

If more than one crop is listed, indicate on the site-use map the areas planted, or to be planted, in each different type of crop.

Has this application site been used for land application of any biosolids or industrial waste products from any other facility within the past 365 day period? Yes [ ] No [X] If yes, by whom?

Date of last soil analysis of this site	01/08/20
pH range from last soil analysis of this site	6.1-7.5
Date on which last soil pH adjustment was made on this site	
Minimum CEC from last soil analysis of this site *(does not apply to sites where biosolids are applied)*	6.4

Indiana Department of Environmental Management

Solid Waste Permits Section - Office of Land Quality

Land Application Site Activity Report - Biosolids and Industrial Waste Products

>>Complete and submit this form to IDEM for each application site used during a report month<<

Month:	March		**Year:**	2018	Place "X" below if first use of site by this permittee
Permittee:	Pleasantview Utilities		**Site ID:**	PLEASANT	
L.A. Permit No. IN LA:	699		**Acres Available:**	13.82	
Type of Material Applied This Month:	2		**Acres Used This Month:**	13.82	

Types of Material: 1 = Anaerobically Digested Biosolids, 2 = Aerobically Digested Biosolids, 3 = Industrial Waste Product

Loading Data: Date:	Dry Tons Applied	% Total Solids	Acres Used	Method Used* 1, 2, or 3	Metal Analysis 1 or 2	Nutrient Analysis 1 or 2
1						
2						
3						
4						
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11						
12	19.01	3.85	13.82	2	2	2
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30						
31						

*Methods of Application: 1 = Surface, 2 = Injection, 3 = Incorporation

Lab Data: **DO NOT USE < IF NOT DETECTED**

Heavy Metal Analysis: **ENTER DETECTION LIMIT!**

ANALYSIS #		**1**	**2**	
Sample Report Date		10/26/17	10/26/17	
% Total Solids		3.85	3.85	
Arsenic	(As)	0.05	1.30	mg/kg dry wt.
Cadmium	(Cd)	0.06	1.59	mg/kg dry wt.
Copper	(Cu)	5.74	149.00	mg/kg dry wt.
Lead	(Pb)	0.76	19.80	mg/kg dry wt.
Mercury	(Hg)	0.01	0.16	mg/kg dry wt.
Molybdenum	(Mo)	0.41	10.60	mg/kg dry wt.
Nickel	(Ni)	0.68	17.60	mg/kg dry wt.
Selenium	(Se)	0.05	1.30	mg/kg dry wt.
Zinc	(Zn)	16.30	423.00	mg/kg dry wt.

Nutrient Analysis: **DO NOT USE < IF NOT DETECTED**

ENTER DETECTION LIMIT!

ANALYSIS #		**1**	**2**	
% Total Solids		3.85	3.85	
Total N	(TN)	3237.00	8.41	% dry wt.
Ammonium N	(NH4-N)	60.60	0.16	% dry wt.
Nitrate N	(NO3-N)	0.55	0.00	% dry wt.
Phosphorus	(P)	395.00	1.03	% dry wt.
Potassium	(K)	100.00	0.26	% dry wt.

Other Analysis:

ANALYSIS #		**1**	**2**	
PCB		0.01	0.30	mg/kg dry wt.
Other				
Other				

What is the projected crop(s) for which the above application(s) was intended to fertilize? corn

If more than one crop is listed, indicate on the site-use map the areas planted, or to be planted, in each different type of crop.

Has this application site been used for land application of any biosolids or industrial waste products from any other facility within the past 365 day period? Yes [ ] No [X] If yes, by whom? [ ]

Date of last soil analysis of this site	10/19/15
pH range from last soil analysis of this site	6.7
Date on which last soil pH adjustment was made on this site	
Minimum CEC from last soil analysis of this site *(does not apply to sites where biosolids are applied)*	12.4

Clear This Page

Indiana Department of Environmental Management

Solid Waste Permits Section - Office of Land Quality

Land Application Site Activity Report - Biosolids and Industrial Waste Products

>>Complete and submit this form to IDEM for each application site used during a report month<<

Month:	May	**Year:**	2023	Place "X" below if first use of site by this permittee	
Permittee:	Pleasantview Utilities, Inc	**Site ID:**	Pleasant		
L.A. Permit No. IN LA:	699	**Acres Available:**	13.82		
Type of Material Applied This Month:	2	**Acres Used This Month:**	13.82		

Types of Material: 1 = Anaerobically Digested Biosolids, 2 = Aerobically Digested Biosolids, 3 = Industrial Waste Product

Loading Data:

Date:	Dry Tons Applied	% Total Solids	Acres Used	Method Used* 1, 2, or 3	Metal Analysis 1 or 2	Nutrient Analysis 1 or 2
1						
2						
3						
4						
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11						
12	13.40	1.89	13.82	2	2	2
13						
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30						
31						

*Methods of Application: 1 = Surface, 2 = Injection, 3 = Incorporation

Lab Data: DO NOT USE < IF NOT DETECTED

Heavy Metal Analysis: ENTER DETECTION LIMIT!

ANALYSIS #		1	2	
Sample Report Date		05/19/23	05/19/23	
% Total Solids		1.89	1.89	
Arsenic	(As)	0.05	2.65	mg/kg dry wt.
Cadmium	(Cd)	0.01	0.27	mg/kg dry wt.
Copper	(Cu)	2.58	136.00	mg/kg dry wt.
Lead	(Pb)	0.14	7.30	mg/kg dry wt.
Mercury	(Hg)	0.00	0.06	mg/kg dry wt.
Molybdenum	(Mo)	0.03	1.61	mg/kg dry wt.
Nickel	(Ni)	0.14	7.30	mg/kg dry wt.
Selenium	(Se)	0.05	2.65	mg/kg dry wt.
Zinc	(Zn)	3.00	159.00	mg/kg dry wt.

Nutrient Analysis: DO NOT USE < IF NOT DETECTED ENTER DETECTION LIMIT!

ANALYSIS #		1	2	
% Total Solids		1.89	1.89	
Total N	(TN)	452.91	2.40	% dry wt.
Ammonium N	(NH4-N)	67.40	0.36	% dry wt.
Nitrate N	(NO3-N)	8.91	0.05	% dry wt.
Phosphorus	(P)	44.10	0.23	% dry wt.
Potassium	(K)	27.40	0.15	% dry wt.

Other Analysis:

ANALYSIS #		1	2	
PCB		0.01	0.50	mg/kg dry wt.
Other				
Other				

What is the projected crop(s) for which the above application(s) was intended to fertilize? soybeans

If more than one crop is listed, indicate on the site-use map the areas planted, or to be planted, in each different type of crop.

Has this application site been used for land application of any biosolids or industrial waste products from any other facility within the past 365 day period? Yes [ ] No [X] If yes, by whom? [ ]

Date of last soil analysis of this site	01/08/20
pH range from last soil analysis of this site	6.1-7.5
Date on which last soil pH adjustment was made on this site	
Minimum CEC from last soil analysis of this site *(does not apply to sites where biosolids are applied)*	6.4

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

June 4, 2007

Matthew Sherck, President
Pleasant View Utilities, Inc.
3812 West Galaxy Drive
Connersville, IN 47331

Dear Mr. Sherck:

Re: Compliance Plan
Approval with Contingencies
Pleasant View Utilities, Inc.
Case No. 2005-14957-W

This office and the Office of Water Quality's Inspections Section have reviewed the CP submission that was received on May 25, 2007, in response to the Agreed Order (AO) requirements of Case No. 2005-14957-W. The CP submission is approved contingent upon assignment of milestone calendar dates for completion in relationship to time elapsed from the date of approval of this CP. The scheduled milestone dates, as calculated from the approved Compliance Plan (see enclosure), are as follows:

Project 1- New Flow Meter/Blower Control	September 15, 2007
Project 2- EQ/Digester Tank Conversion	December 15, 2007
Project 3- New Chlorine Contact Tank	June 15, 2008
Project 4- Reconfiguration of Lagoons	December 15, 2008
Project 5- Wastewater Treatment Plant Repairs	December 15, 2007
Project 6- Collection System	
a) Repair identified inflow	September 15, 2007
b) Identify significant inflow	June 15, 2008
c) Collection System Repairs	June 15, 2008 (Start) June 15, 2010 (Completed)

Upon satisfaction of the contingency, the CP is found to be adequate in completing requirements of Section II., Paragraph 3 of the AO, to provide a CP that identifies the actions that Respondent will take to: install and maintain a proper disinfection/dechlorination system; eliminate all sanitary sewer overflow points; implement a proper method of sludge disposal; implement mapping of sewers, flow study, and repairs to sewers; upgrade, expand, and/or replace the wastewater treatment plant, and submit a construction permit application, including plans and specifications, for any work requiring prior construction approval.

Pursuant to Paragraph 5 of the Order portion of the AO, the requirements of Paragraphs 2, 3, 4, 6, and 8, and the milestone dates established by the CP remain to be met as an enforceable part of the AO. Stipulated penalty liabilities may still exist for failure to meet any of the AO conditions including scheduled milestone dates related to CP implementation. The approved CP is deemed incorporated into the Agreed Order and shall be an enforceable part thereof.

If you have questions, please contact Dave Knox at 317/233-5975.

Sincerely,

Mark W. Stanifer, Chief
Water Section
Office of Enforcement

Enclosure

cc: Fayette County Health Department
John W. Bodwell, P.C.

PLEASANTVIEW UTILITIES, INC.

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Dave Knox	Matt Sherck
COMPANY:	DATE:
IDEM	5/24/2007
FAX NUMBER:	TOTAL NO. OF PAGES, INCLUDING COVER:
233-5968	2
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
Compliance Plan	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Let me know if you have any questions

3812 W GALAXY DRIVE, CONNERSVILLE, IN 47331
(765 309-2973

May 23, 2007

Mr. Dave Knox
IDEM – Office of Enforcement
Mail Code 60-02
100 North Senate Avenue
Indianapolis, IN 46206-6015

Re: Compliance Plan, Pleasantview Utilities, Inc., Case No. 2005-14957-W

Dear Mr. Knox:

In accordance with the requirements of the referenced agreed order, Pleasantview Utilities has developed the following Compliance Plan. This plan is designed to be implemented on a systematic basis. Elements of the Compliance Plan have been prioritized to achieve the most significant results in the shortest possible time.

A series of projects designed to improve the existing wastewater facility will be implemented simultaneously to repairs on the collection system. Initial efforts will focus on the ability of the wastewater facility to handle elevated flows without bypassing installation of a new chlorine contact tank to improve disinfection and removal of sludge from the existing lagoons. At the same time, a systematic approach will be applied to reduce the amount of infiltration and inflow that is entering the collection system. Each of these projects is outlined in the following paragraphs:

- **Wastewater Treatment** – The existing wastewater treatment facility will be significantly modified in order to provide improved treatment of wastewater under all conditions. These changes will result in much greater equalization capacity, a significant reduction in solids overflow from the plant, the elimination of bypasses, the ability to process sludge, and improved disinfection. These projects have been broken down into a logical sequence with implementation and completion dates. Each project can be summarized as follows:

  Project #1. New Flow Meter / Blower Control - A new flow meter will be installed at the current location. The weir will be modified in order to ensure accurate flow measurements at lower flow rates. The flow meter will be a downloadable Ultrasonic unit with 20 milliamp outputs. The flow meter output will be wired to the main blowers. Under elevated flow conditions, the blowers will automatically shut down, preventing solids from washing out into the lagoon system.

As soon as the flow meter installation is complete and the blowers have been programmed for automatic shut off, the overflow points will be blocked. With this change, the amount of solids leaving the plant during elevated flows will be considerably reduced. The effectiveness of this approach has been proven by manually turning off the blowers during recent wet weather events.

This project can be completed within 90 days from approval.

Project #2. **EQ / Digester Tank Conversion** - The 0.0167 mgd parallel plant currently not in use will be converted into a combination equalization and sludge holding tank. The entire aeration tank will be converted for equalization and the clarifier will become a sludge holding tank / digester.

The tank will be cleaned thoroughly. The sludge holding tank / clarifier section will be separated from the mixed liquor. New air diffusers will be installed and connected to the main air header on the adjacent plant. Plumbing will be installed to facilitate wasting of sludge to the new sludge holding tank. New lift pumps and a splitter box will be installed so that flow can be controlled. Influent flow will be diverted to the new equalization tank. A float controlled valve would automatically divert flow to the old equalization tank in the event that the operating level in the new equalization tank gets too high for any reason. The equalization tank lift pumps and splitter box will pump influent flow into the existing equalization tank.

The estimated completion date for this project would be 180 days after approval.

Project #3. **New Chlorine Contact Tank** - A new chlorine contact tank complete with discharge piping would be installed. This tank would be located near the point where secondary effluent currently enters the first lagoon. The liquid chlorination and dechlorination system would be installation with metering pumps controlled by output from the flow meter. The flow meter sensor would be moved to measure flow through a weir to be installed at the point of discharge from the new chlorine contact tank. A pipe would connect the discharge

from the contact tank to the creek. This would be a new discharge point. The old discharge point from the second lagoon would be plugged permanently.

On a temporary basis, all secondary effluent would be routed through the new chlorine contact tank. This would facilitate work on the lagoon as described in Project #4.

The completion date for the installation of the chlorine contact tank, disinfection system and moving the flow meter would be 1 year from approval.

Project #4. **Reconfirguration of Lagoons** – Both lagoons would be drained and cleaned. In order to make use of the new contact tank and discharge point, secondary effluent would be rerouted directly to the far lagoon, which is now the secondary lagoon. Flow would then come back through the first lagoon and then to the chlorine contact tank and the outfall. Essentially, this would reverse the current lagoon flow. In doing so, the lagoon capacities would be slightly reduced due to the elevations, but use of the new chlorine contact tank and flow meter would be facilitated.

The projected completion date for reconfiguring flow through the lagoons would be 18 months after approval.

Project #5. **Wastewater Treatment Plant Repairs** – There are several components of the existing plant that require repair work. We propose to complete the following repairs:

a. Replacement of the main air header in the existing plant.
b. Replacement of diffuser drops and diffusers.
c. Tank repairs and enhanced corrosion protection.
d. Repair / Replacement of blower #2.

These repairs would be completed within 6 months of approval.

Project #6. **Collection System** – The collection system correctly allows significant amounts of infiltration and inflow to enter the wastewater system. A systematic approach to making repairs is the most logical and cost effective way to pursue significant improvements. We propose the following approach:

a. Repair identified points of significant inflow. There are at least five manholes which allow significant inflow to occur during wet weather. Each of these would be properly sealed. This work would be completed within 90 days of approval.

b. Identification of significant points of inflow. Televising and/or smoke testing would be performed to identify and prioritize the most significant problem areas. This work would be completed within 1 year of approval.

c. Collection System Repairs – Problem areas identified would be repaired as necessary. This work would begin within 1 year of plan approval and completed within 3 years.

We are confident that this approach will significantly improve the operation of the treatment facility while simultaneously reducing the amount of infiltration and inflow that the plant receives. The most significant improvements will be the immediate elimination of the two bypass points, followed by an initial increase in equalization capacity. Improved disinfection, followed by another significant increase in equalization capacity would follow.

Please let us know if there are any questions or if additional information is needed about the Compliance Plan.

Sincerely,

Matthew Sherck

Q-1-7: Please provide Applicant's asset register for its wastewater utility. An asset register is a list of assets for each utility plant in service account and should include the following for each asset: (1) a description of asset, (2) the date the asset was acquired, (2) the original cost of the asset, (3) the date the asset was retired or otherwise disposed of, and (4) any salvage value received or costs incurred to retire the asset. Attached as depreciation schedule

Q-1-8: According to page W-8 of Applicant's 2023 IURC Annual Report, Applicant has a written asset management plan. Please provide a copy of Applicant's current wastewater utility asset management plan. Report done by accountant, shoul be no

Q-1-9: According to page S-8 of Applicant's 2023 IURC Annual Report, Applicant has a written inventory of its assets. Please provide the current written inventory of Applicant's wastewater utility assets and state the date this inventory was last updated. Attached as depreciation schedule

Q-1-10: According to page S-8 of Applicant's 2023 IURC Annual Report, Applicant schedules and conducts periodic condition assessments of its assets. Please state when the most recent condition assessment was conducted for the wastewater utility and provide the results of that assessment. Assessment done this summer shows system is in need of upgrades and maintenance, upgrades done to aeration and sludge system. Long term need replaced or other option pump to Connersville treatment plant. Evaluation by engineer working on upgrade to permit. No written report. Additional assessment done in 2022 and attached.

Q-1-11: Please explain why Applicant reflects the shareholder loan ($29,849 as of 12/31/23) as "Notes Payable to Associated Companies" on tab "Sch. 2 Bal. Sh. - E+L" in its water small utility application but reflects the same loan as "Other Paid-in Capital" on tab "Sch. 2 Bal. Sh. - E+L" in its wastewater small utility application.

Question for Bonnie Mann who put together application.

Q-1-12: Please breakdown Applicant's proposed rate case expense by type of expense (legal, accounting, etc.) and provide any associated contracts and invoices received.

Q-1-13: Please provide a copy of the D&S Water and Wastewater Services contract. No longer contracted for PV

Q-1-14: What services does D&S Water and Wastewater Services provide ?

D&S WATER AND WASTEWATER SERVCES 9730 WEST 600 N ARLINGTON, IN 46104 PH 765-99[illegible]
EMAIL: LES.DAY@DSWATERSERVICES.COM

Matt Sherck
Pleasant View WWTP
3812 W Galaxy Dr
Connersville, In 47331

Re: Assessment

Our assessment of the Pleasant View WWTP suggests that a three-option approach should be considered.

Option One

Option one is to abandon the existing treatment facility located at 3812 West Galaxy Dr, connect to an exciting sanitary sewer system, located at three hundred West and Country Club Road, the sanitary sewer system is owned by the City of Connersville Utilities.

This connection would require the addition of two, Duplex Lift stations, rated at one hundred gallons per minute and approximately 2.9 miles (15,312 feet) of 6-inch force main, the most economical installation method would be directional bore, the 15,312 feet of force main.

Total estimated price for option one is $1,065,000 million dollars. Financing would have to be considered for this option. Research would have to be conducted to determine if a private utility is eligible for financial assistance.

Option Two:

Option Two is to abandon the existing treatment facility and install a new Sequencing Batch Reactor (SBR) plant.

For obtaining budget numbers, the Aqua-CAM-D Combination Aerator/Mixer/Decanter system was considered. The enclosed Process Design Report will give the details on the preliminary design of the project.

Total estimated price for option two is $768,020.00. Research would have to be conducted to determine if a private utility is eligible for financial assistance.

D&S WATER AND WASTEWATER SERVCES 9730 WEST 600 N ARLINGTON, IN 46104 PH 765-993-3978
EMAIL: LES.DAY@DSWATERSERVICES.COM

Option Three:

Option Three is to keep the existing plant, this would require an upgrade of the plant and collection system.

Although the treatment plant has had violations in the past, the plant can produce a quality effluent that meets the NPDES permit limits.

Our observation is that the plant piping above ground needs replaced, since there were not any tanks drained, inspecting the condition of submerged piping, was not done, therefore, there could not be a sound decision made on the it is condition.

For the collection system evaluation, we would suggest that smoke testing be done, this would determine the condition of the underground piping to the WWTP.

This option would have to further evaluated to determine the estimated cost, current condition of the plant submerged piping would have to determined, completed smoke testing would be helpful in the determination of the collection system condition and cost.

Sincerely,

Leslie Day

Leslie Day/Operator

D&S Water and Wastewater Services

Attachments:

1. Process Design Report.
2. Pricing Email Correspondence.
3. Location of the Sanitary Sewer Hookup.

D&S WATER AND WASTEWATER SERVCES 9730 WEST 600 N ARLINGTON, IN 46104 PH 765-99[illegible]
EMAIL: LES.DAY@DSWATERSERVICES.COM

Attachment 1:

AQUA-AEROBIC SYSTEMS, INC.
A Metawater Company

Process Design Report

PLEASANT VIEW WWTP, IN

Design# 168015
Option: Preliminary SBR Design

AquaSBR®

Sequencing Batch Reactor

May 23, 2022
Designed By: Nicholas Fortsas

6306 N. Alpine Rd Loves Park, IL 61111
(815) 654-2501 www.aqua-aerobic.com

Design Notes

Upstream Recommendations

- Neutralization is required ahead of the biological system if the pH is expected to fall outside of 6.5-8.5 for significant durations.

- Coarse screening and grit removal is recommended (by others) ahead of the biological system.

- Elevated concentration of hydrogen sulfide can be detrimental to both civil and mechanical structures. If anaerobic conditions exist in the collection system, steps should be taken to eliminate hydrogen sulfide prior to the treatment system.

Flow Considerations

- The maximum flow, as shown on the design, has been assumed as a hydraulic maximum and does not represent an additional organic load.

Biological Process

- The decanter performance is based upon a free-air discharge following the valve and immediately adjacent to the basin. Actual decanter performance depends upon the complete installation including specific liquid and piping elevations and any associated field piping losses to the final point of discharge. Modification of the high water level, low water level, centerline of discharge, and / or cycle structure may be required to achieve discharge of full batch volume based on actual site installation specifics.

Aeration

- The aeration system has been designed to provide 1.50 lbs. O2/lb. BOD5 applied and 4.6 lbs. O2/lb. NH3-N applied at the design average loading conditions, while maintaining a residual DO concentration of 2.00 mg/l.

Process/Site

- The following parameters have been assumed, as displayed on the design (engineer to verify): Elevation, influent Total P, in basin temperatures, ambient temperatures.

- The anticipated effluent nitrogen requirement is predicated upon an influent waste temperature of 10 °C or greater. While lower temperatures may be acceptable for a short-term duration, nitrification and (if required) denitrification below 10 °C can be unpredictable, requiring special operator attention.

- Sufficient alkalinity is required for nitrification, as approximately 7.1 mg alkalinity (as CaCO3) is required for every mg of NH3-N nitrified. If the raw water alkalinity cannot support this consumption, while maintaining a residual concentration of 50 mg/l, supplemental alkalinity shall be provided (by others).

- The average, maximum and peak design flow and loading conditions, shown within the report, are based on maximum month average, maximum day and peak hour conditions, respectively.

Equipment

- Changes in basin geometry may require alterations in the equipment recommendation.

- The basins are not included and shall be provided by others.

- Influent is assumed to enter the reactor above the water level, away from the decanter, and to avoid splashing or direct discharge in the immediate vicinity of other equipment. If the influent enters the basin below the water level, adequate hydraulic capacity shall be made in the headworks to prevent backflow from one reactor to the other during transition of influent.

- Based on the process requirements and selected equipment, the reactor wall height should be at least 19 ft in the biological system.

- Scope of supply includes freight, installation supervision and start-up services.

- Equipment selection is based upon the use of Aqua-Aerobic Systems' standard materials of construction and electrical components, suitable for non-classified electrical environments.

- The basin dimensions reported on the design have been assumed based upon the required volumes and assumed basin geometry. Actual basin geometry may be circular, square or rectangular with construction materials including concrete or steel.

- The control panel does not include motor starters or VFDs, which should be provided in a separate MCC (by others).

- Provisions should be made, by others, for overflows in each of the recommended basins.

- Aqua-Aerobic Systems, Inc. is familiar with various "Buy American" Acts (i.e. AIS, ARRA, Federal FAR 52.225, EXIM Bank, USAid, PA Steel Products Act, etc.). As the project develops Aqua-Aerobic Systems can work with you to ensure full compliance of our goods with various Buy American provisions if they are applicable/required for the project. When applicable, please provide us with the specifics of the project's "Buy American" provisions.

AquaSBR® - Sequencing Batch Reactor - Design Summary

DESIGN INFLUENT CONDITIONS

Avg. Design Flow	= 0.05 MGD	= 189 m3/day
Max Design Flow	= 0.15 MGD	= 568 m3/day
Peak Hyd. Flow	= 0.25 MGD	= 946 m3/day (modifying cycles)

DESIGN PARAMETERS

	Influent	mg/l	Effluent Required	<= mg/l	Effluent Anticipated	<= mg/l
Bio/Chem Oxygen Demand:	CBOD	192	BOD5	10	BOD5	10
Total Suspended Solids:	TSS	13	TSS	10	TSS	10
Inf. Ammonia Nitrogen:	NH3-N	12	--	--	--	--
Ammonia Nitrogen:	--	--	NH3-N	1	NH3-N	1

SITE CONDITIONS

	Maximum		Minimum		Elevation (MSL)
Ambient Air Temperatures:	85 F	29.4 C	15 F	-9.4 C	823 ft
Influent Waste Temperatures:	68 F	20.0 C	50 F	10.0 C	250.9 m

SBR BASIN DESIGN VALUES

			Water Depth			Basin Vol./Basin		
No./Basin Geometry:	= 2 Rectangular Basin(s)		**Min**	= 10.4 ft	= (3.2 m)	**Min**	= 0.024 MG	= (89.6 m³)
Freeboard:	= 2.0 ft	= (0.6 m)	**Avg**	= 12.6 ft	= (3.8 m)	**Avg**	= 0.029 MG	= (108.5 m³)
Length of Basin:	= 19.0 ft	= (5.8 m)	**Max**	= 17.0 ft	= (5.2 m)	**Max**	= 0.039 MG	= (146.3 m³)
Width of Basin:	= 16.0 ft	= (4.9 m)						

Number of Cycles:	= 5 per Day/Basin	
Cycle Duration:	= 4.8 Hours/Cycle	
Food/Mass (F/M) ratio:	= 0.101 lbs. CBOD/lb. MLSS-Day	
MLSS Concentration:	= 2000 mg/l @ Min. Water Depth	
Hydraulic Retention Time:	= 1.146 Days @ Avg. Water Depth	
Solids Retention Time:	= 25.4 Days	
Est. Net Sludge Yield:	= 0.336 lbs. WAS/lb. CBOD	
Est. Dry Solids Produced:	= 26.9 lbs. WAS/Day	= (12.2 kg/Day)
Est. Solids Flow Rate:	= 40 GPM (323 GAL/Day)	= (1.2 m³/Day)
Decant Flow Rate @ MDF:	= 300 GPM (as avg. from high to low water level)	= (18.9 l/sec)
LWL to CenterLine Discharge:	= 1.0 ft	= (0.3 m)
Lbs. O2/lb. CBOD	= 1.50	
Lbs. O2/lb. NH3-N	= 4.60	
Actual Oxygen Required:	= 143 lbs./Day	= (64.9 kg/Day)
Daily Max. Month Avg. Estimated Power*:	= 170.6 KW-Hrs/Day	

* Power consumption calculations in this document are based on maximum month conditions. Detailed power vs. loading calculations can be provided if requested.

Equipment Summary

AquaSBR

Influent Valves

2 Influent Valve(s) will be provided as follows:

- 4 inch electrically operated plug valve(s).

Transfer Pumps/Valves

2 Submersible pump assembly(ies) consisting of the following items:

- 2.4 HP Submersible Pump(s) with painted cast iron pump housing, discharge elbow, and multi-conductor electrical cable.
- 3 inch diameter plug valve(s).
- 3 inch diameter swing check valve.
- Guide bar(s).
- Upper guide bar bracket(s).

AquaCam-D

2 AQUACAM-D Assembly(ies) consisting of:

- 7.5 HP Aerator/Mixer/Decanter(s) with fiberglass floats, painted steel power section, and 304 stainless steel restrained mooring frame and weir.
- Aluminum band clamp heater integral to the decanter power section(s).
- 6 inch diameter decant hose assembly.
- 4" schedule 40 galvanized restrained mooring post(s) with base plate.
- #12 AWG-four conductor electrical service cable(s).
- #14 AWG ten-conductor electrical service cable(s).
- 6 inch electrically operated butterfly valve(s) with actuator.

Level Sensor Assemblies

2 Pressure Transducer Assembly(ies) each consisting of:

- Pressure transducer(s).
- Mounting bracket weldment(s).
- Transducer mounting pipe weldment(s).

2 Level Sensor Assembly(ies) will be provided as follows:

- Float switch(es).
- Float switch mounting bracket(s).
- Stainless steel anchors.

Instrumentation

2 Dissolved Oxygen Assembly(ies) consisting of:

- DO probe(s).

2 Process Controller(s) consisting of:

- Controller and display module(s).

Controls

Controls wo/Starters

1 Controls Package(s) will be provided as follows:

- NEMA 12 panel enclosure suitable for indoor installation and constructed of painted steel.
- Fuse(s) and fuse block(s).
- Compactlogix Processor.
- Operator interface(s).
- Remote access Ethernet modem(s).

AQUA-AEROBIC SYSTEMS, INC.

AquaCAM-D®

COMBINATION AERATOR/MIXER/DECANTER

AquaCAM-D®

COMBINATION AERATOR/MIXER/DECANTER

The AquaCAM-D® is a combination aerator/mixer/decanter designed for use in sequencing batch reactor systems (SBRs), treating flows as low as a few thousand gallons per day up to 100,000 gallons per day. The unit independently aerates and mixes the reactor to achieve anaerobic, anoxic and aerobic environments, while offering subsurface decanting of the final effluent. These capabilities make the AquaCAM-D ideal for low level phosphorus and total nitrogen applications. The unit has proven performance in a variety of municipal and industrial applications for both pretreatment and secondary wastewater treatment.

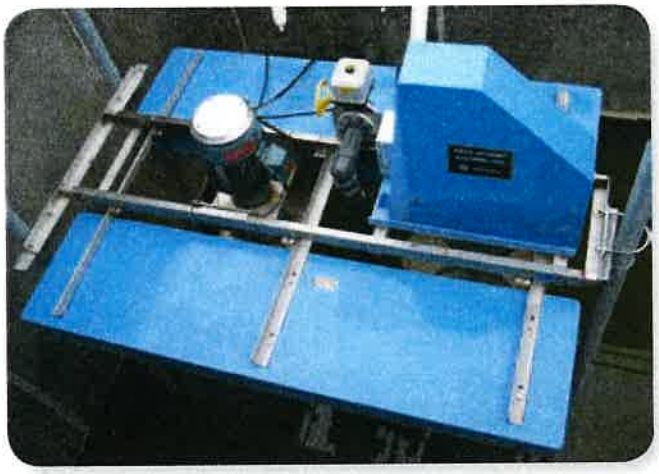
Features and Advantages

- Economical Enhanced Biological Nutrient Removal for Lower Flows
- Simple, Low Cost Installation
- Surface Accessible Components
- Proven Aqua-Aerobic Decanter
- Modular Design Promotes Easy Expansion
- Flexible Tank Options
- No Aeration Yard Piping or Blower Buildings
- Ideal for Cold Climates

Overview of the AquaCAM-D® unit in a SBR reactor.

Typical Applications

- Schools
- Residential Subdivisions
- Shopping Malls
- Parks, Camps, and Resorts
- Mobile Home Parks
- Nursing Homes
- Landfill Leachate
- Industrial Wastewater



Close-up view of the AquaCAM-D® system.

Operation Description

High velocity movement of water through the air induction volute creates a pressure differential. Atmospheric air is drawn into the volute through the air intake port and forcefully discharged into the basin, enhancing oxygen transfer. By opening the unit's electrically operated air valve, the Aqua CAM-D is operated as an aerator. Closing the air valve enables the unit to operate as a mixer, allowing for anoxic mixing during selected phases of the SBR cycle. Following the Settle phase of the SBR cycle, the submerged weir of the decanter opens and draws clear effluent from below the water surface. The AquaCAM-D is then ready to begin its next cycle of treatment.

Operation of the unit is controlled by a microprocessor with automatic level overrides to control the system during conditions of greater than peak flow.

Visit our website to learn more about the AquaCAM-D® system and our complete line of products and services.

Aqua-Aerobic Systems, Inc. 6306 N. Alpine Rd. Loves Park, IL 61111 P 815.654.2501 F 815.654.2508 www.aqua-aerobic.com solutions@aqua-aerobic.com

Bulletin #951C 11/12

D&S WATER AND WASTEWATER SERVCES 9730 WEST 600 N ARLINGTON, IN 46104 PH 765-998-3276
EMAIL: LES.DAY@DSWATERSERVICES.COM

Attachment 2:

Les Day

From: Les Day <les.day@dswaterservices.com>
Sent: Monday, June 6, 2022 9:57 AM
To: Les Day
Subject: Fwd: Pleasant View WWTP, IN - Preliminary Design Report - 112704A
Attachments: 2022-05-23 Preliminary Design 168015.pdf; Aqua CAM-D Brochure.pdf

Get Outlook for Android

From: Rick Wilhelm <rick@jdtco.com>
Sent: Tuesday, May 24, 2022 8:00:04 AM
To: Les Day <les.day@dswaterservices.com>
Subject: Pleasant View WWTP, IN - Preliminary Design Report - 112704A

Les – Aqua has provided the attached preliminary SBR design for Pleasant View. Budgetary pricing for equipment only can be found in Aqua's notes below. I've also attached a general brochure of the CAM-D system showing the mixer, aerator & decanter on one float.

Feel free to call me any time to go over the design, tank sizing, scope, etc. One question – I just noticed that the TSS loading is only 13 mg/l, is that accurate? I'm not sure that affects the equipment design except for the comment of running low mixed liquors and overall sludge production.

Best regards,
Rick

Richard J. Wilhelm, PE, President
J. Dwight Thompson Company
6847 State Route 128, Suite B
PO Box 505, Miamitown, OH 45041
(513) 871-9970 office
(513) 702-4780 cell
rick@jdtco.com
www.jdtco.com

From: Harry DeBruler <HDeBruler@aqua-aerobic.com>
Sent: Monday, May 23, 2022 1:57 PM
To: Rick Wilhelm <rick@jdtco.com>
Cc: Tatiana Mazzei <TMazzei@aqua-aerobic.com>; Amber Steder <ASteder@aqua-aerobic.com>; Steve Stanish <SStanish@aqua-aerobic.com>; Debbie Hyke <DHyke@aqua-aerobic.com>; Nicholas Fortsas <NFortsas@aqua-aerobic.com>; File Archive <Archive@aqua-aerobic.com>
Subject: Pleasant View WWTP, IN - Preliminary Design Report - 112704A

Rick,

Please see attached preliminary design #168015 for the Pleasant View WWTP, IN project. Based on an average flow of 0.05 MGD and a maximum flow of 0.15 MGD, we recommend two (2) 19'x16'x17' HWL AquaSBR® Sequencing Batch Reactors each fitted with a 7.5 HP AquaCAM-D® Combination Aerator/Mixer/Decanter unit. We recommend running the system at a MLSS concentration of 2,000 mg/L as reflected on the design report. This will help reduce the sludge age to an acceptable level.

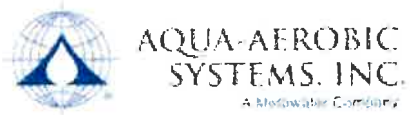
The preliminary budget price for the equipment in this design, including freight to the jobsite and our standard start-up supervision services, is $384,010.

Please let us know if you have any questions or if any additional information is needed at this time.

Kind Regards,

Harry DeBruler
Application Engineer

AQUA-AEROBIC SYSTEMS, INC.
6306 N. Alpine Rd.
Loves Park, IL 61111-7655
Ph: 815-639-4525 Fax: 815-654-8258
E-mail: hdebruler@aqua-aerobic.com
www.aqua-aerobic.com
Follow Us: LinkedIn and Twitter



Aqua-Aerobic Systems, Inc.

http://www.aqua-aerobic.com

Thank you for your assistance

D&S WATER AND WASTEWATER SERVCES 9730 WEST 600 N ARLINGTON, IN 46104 PH 765-993-3978
EMAIL: LES.DAY@DSWATERSERVICES.COM

Attachment 3:

Google Maps Pleasant View Utilities, Inc. to W Country Club Rd, Connersville, IN 47331

Drive 2.9 miles, 5 min

via IN-44 E — 5 min
Fastest route now due to traffic conditions — 2.9 miles

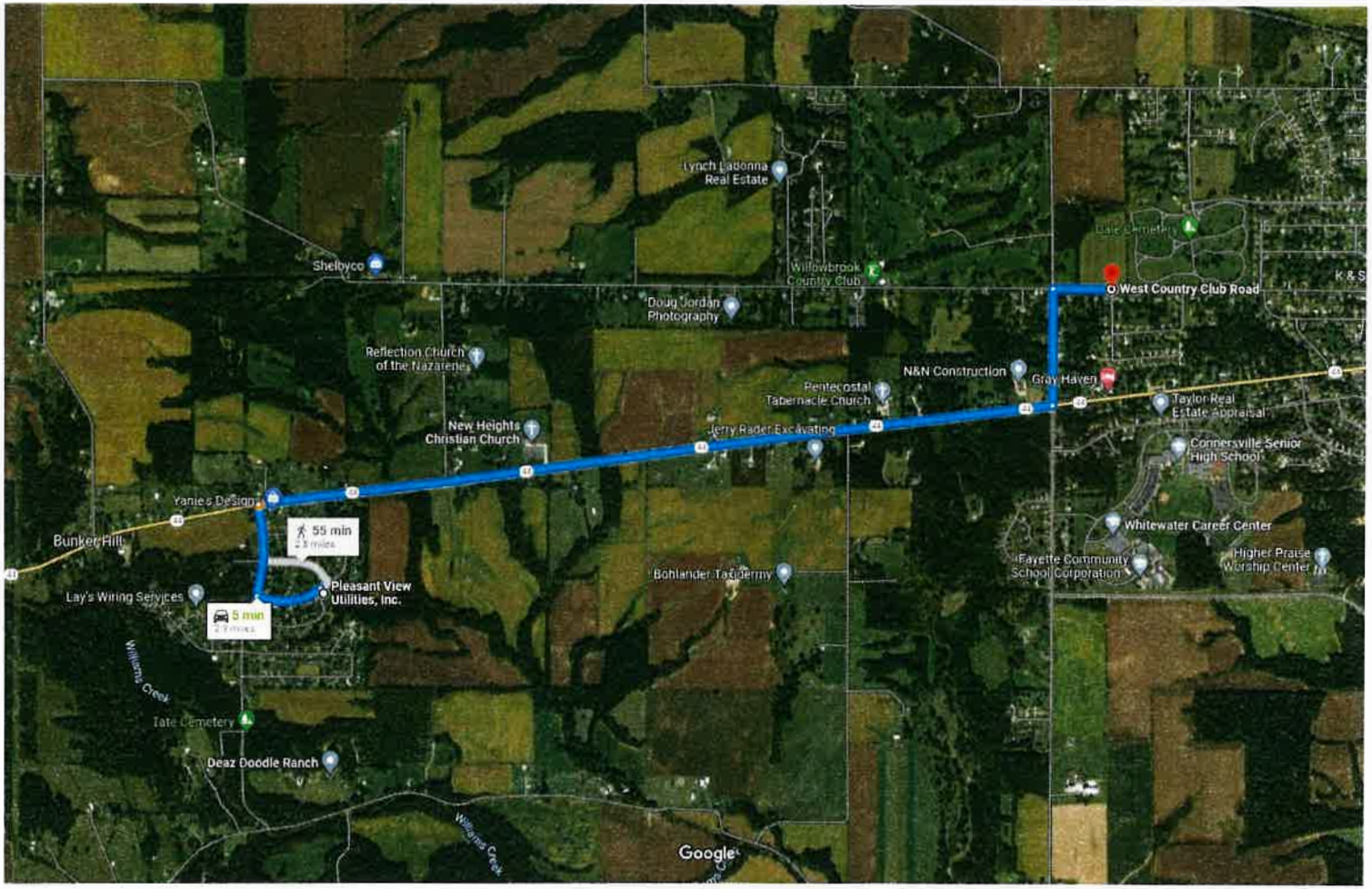
Search along this route

Gas | EV charging | Fast food

via IN-44 E — 55 min
2.8 miles

Explore W Country Club Rd

Restaurants Hotels Gas stations Parking Lots More



Imagery ©2022 IndianaMap Framework Data, Maxar Technologies, USDA/FPAC/GEO, Map data ©2022 1000 ft

ASSET MANAGEMENT PROGRAM

GUIDANCE FOR THE INDIANA STATE REVOLVING FUND LOAN PROGRAM

July 2024

Original Document: July 2018
First Revision: July 2021

Asset Management Program Guidance

Overview

Table of Contents

ASSET MANAGEMENT PROGRAM GUIDANCE FOR INDIANA STATE REVOLVING FUND LOAN PROGRAM

OVERVIEW

I. Introduction to the Asset Management Program

An Asset Management Program (AMP) is a document(s) developed by a Utility to assist in the long-term management of the assets necessary to support cost effective, proactive decisions including creation, acquisition, operation & maintenance (O&M), and replacement/upgrade of Utility assets. Physical components deteriorate over time, resulting in increased O&M costs or capital reinvestment to maintain the level of service expected by the customers and stakeholders.

AMPs are intended to ensure the long-term sustainability of a Utility and should be treated as "living documents" that are regularly referenced, revised, expanded, and implemented as an integral part of the operation and management of a Utility's system. They provide a structured framework of the asset information to help the Utility and stakeholders determine when it is most appropriate to repair, replace, or rehabilitate a particular asset as well as scheduling a long-term funding strategy to ensure sufficient funds will be available to implement the Utility's improvements as needed. The objective of an AMP is to achieve the lowest long-term cost of operation while continuously providing the desired level of service.

An AMP is important for the following reasons:

1. Utility assets provide an essential customer service.
2. Proper O&M and scheduled replacement of these assets is essential for public health and safety.
3. These assets represent a major public investment.
4. Utilities are important to economic development.
5. Proactive management will maximize system reliability and control efficiency.

II. Federal & Statutory Requirements

Pursuant to Indiana Code 5-1.2-10-16, Clean Water State Revolving Fund (CWSRF) and Drinking Water State Revolving Fund (DWSRF) Loan Recipients are required to provide "documentation demonstrating that the Participant has the financial, managerial, technical, and legal capability of operating and maintaining" its wastewater collection and treatment system (or drinking water supply, treatment, and distribution system, respectively) and are required to "demonstrate that it has developed or is in the process of developing an asset management program as defined in the guidelines of the authority". The "authority" is the Indiana Finance Authority (IFA), which administers the State Revolving Fund (SRF) as well as other Environmental Finance Programs.

III. Asset Management Program Guidance

Whether a Utility has implemented an AMP or will implement an AMP, these plans should provide a basis for the ongoing "living document" for the Utility and stakeholders to assist in the long-term management of assets. An AMP is required for the entire wastewater system for CWSRF funded projects and for the entire water system for DWSRF funded projects. The minimum steps that the Utility must take to satisfy these requirements are outlined in this guidance.

The IFA provides this guidance document to assist in the development of the required AMP. The Utility must develop and implement an AMP that includes the following minimum requirements:

1. System map
2. An inventory and assessment of system assets
3. Development of an infrastructure inspection, repair, and maintenance plan, including a plan for funding such activities
4. An evaluation and implementation of water and energy conservation efforts
5. An analysis of the customer rates necessary to support the AMP
6. An Audit performed every two years
7. Cyber Vulnerability Assessment performed at least annually
8. Demonstration of the technical, managerial, legal and financial capability to operate and maintain the system, per the guidelines established by the IFA

The IFA provides this guidance document to assist in the development of an effective and compliant document. It is incumbent upon a community to determine the proper tools or framework for the AMP to provide a "best fit" for the size and type of the Utility. It is important to ensure stakeholders are involved early in the process such as the governing board/council, Mayor, Town Manager, City Engineer, etc.

The AMP guidance is organized into the following three sections:

1. Technical
2. Managerial
3. Financial

It is recommended that the Utility's AMP be organized in a similar fashion.

Asset Management Program (AMP) Guidance

Technical Section

Table of Contents

I. Introduction

This Section provides the guidance for development of the required Technical requirements of the AMP. Appendix A contains an Asset Management Workbook Tool which includes sample tables that can assist in the development of the technical section of the AMP.

II. System Map

Create a map of the utility system's Assets and link the Assets to a specific location. An AMP may include GIS mapping, but it is not required. GIS mapping is an effective means of system mapping and has the ancillary benefits including improved record keeping, efficiency, communication, and management. Asset information can be stored in a GIS database and is easily accessible for grouping and reporting. GIS maps are also easily updated and expanded.

Include such Assets as:

1. Gravity and pressure lines (including sizes and material)
2. Valves, hydrants, fittings, backflow preventers, sample stations, chemical feed points, manholes, inlets
3. Lead lines (as identified)
4. Booster/lift stations
5. Water or wastewater treatment plants
6. Water or wastewater storage facilities
7. Meters
8. Wells
9. CSO outfalls and diversion structures

III. Inventory of Critical Utility System Assets

The first core component of an AMP is to identify and document all Assets in the system and applicable date each Asset went into service. Determining the criticality of each Asset is also part of this step. Creating an Asset hierarchy and Asset classification groups will help to facilitate tracking of Asset inventory, condition, and cost. Please reference Appendix A, Table 1 and Sample List of Assets, to assist with completing an inventory of system Assets.

To be considered an Asset, the item should meet at least one of the following criteria:

1. Has a value greater than $5,000. The value can be lower if desired, per a threshold adopted by the City/Town/Utility.
2. Has a useful life greater than one year.
3. Will be the lowest level where a work order is generated by the utility.
4. Is critical to the delivery of process, compliance of regulatory standards, and/or provision of staff safety.

These criteria help to distinguish between an Asset and a component.

Guidance for a utility when performing the Asset inventory include:

A. Accounting for all Assets associated with the Utility: Tools and resources for developing the inventory list may include record drawings, staff knowledge, visual observations, and interviews with residents and consultants. Establishing a complete Asset inventory on the first try may not be possible for a number of reasons, and it is important to remember that the Asset inventory needs to be an ongoing process.

B. Locating the Assets: Utilize the System Map described above.

C. Probability of Failure: The first step to assessing criticality of an Asset is to determine the Condition (Probability of Failure)**.** Factors to consider when determining the Probability of Failure include Asset age, current condition of Asset, failure history, historical knowledge, experiences with that type of Asset, maintenance records, and knowledge regarding how that type of Asset is likely to fail. Then rank the Probability of Failure for each Asset using the following rating system:

5 – Imminent – Likely to occur in the near future
4 – Probable – Not Imminent, but likely to occur several times in the life of an item
3 – Occasional – Likely to occur sometime in the life of an item
2 – Remote – Unlikely, but possible to occur in the life of an item
1 – Improbable – Unlikely, and assumed occurrence may not be experienced

D. Consequence of Failure: The second step to assessing criticality is to determine the Consequence of Failure of the Asset. Rank the Consequence of Failure for each Asset using the following rating system:

5 – Catastrophic disruption
4 – Major disruption
3 – Moderate disruption
2 – Minor disruption
1 – Insignificant disruption

E. Assessing Criticality:

1. The system Assets that have the greatest Probability of Failure and the greatest consequences associated with a failure will be the system Assets that are the most critical.

    a. Multiply Probability of Failure and Consequence of Failure to determine Criticality factor for each system Asset.
    b. Suggested system Asset Criticality factor risk ranges (individual utilities may determine their own ranges as they see fit):
        i. 1 to 8 – Not considered a critical rating.
        ii. 9 to 16 – Important, but not critical.
        iii. >16 – Critical rating.

Example Criticality Table:

Asset	Probability of Failure	Consequence of Failure	Criticality Factor	Criticality Risk Rating
RWW Pump Station	4	5	20	Critical
RAS Pump Station	3	4	12	Important
Digester Basement Sump Pump	2	1	3	Not Critical

2. If a system Asset is determined to have a critical risk rating, then redundancy or close monitoring is important. These will also rank higher in capital improvement priority than other system Assets with similar condition and performance rankings as described in the next section.

3. Because the condition of an Asset will change over time as will the consequences related to failure, it will be necessary to periodically review the criticality analysis and make adjustments.

IV. Evaluation of the Condition and Performance of Utility System Assets

Evaluating the system Assets' condition and performance is very important. Physical inspections of the system Assets will be needed as well as a review of any available equipment manuals. Please reference Appendix A, Tables 2 and 3, to assist with completing an evaluation of the conditions of the system's Assets.

Questions that a utility will need to ask when performing this component include:

A. What is the condition and remaining useful life of the Asset?

1. Rank the condition of each system Asset using the following rating system:

   a. 5 – Unserviceable/End of useful life (>50% of Asset requires replacement)
   b. 4 – Significant deterioration (20-50% requires renewal/upgrade)
   c. 3 – Moderate deterioration (10-19% requires significant maintenance/renewal)
   d. 2 – Minor deterioration (<10% requires minor maintenance)
   e. 1 – Excellent or as-built condition (only normal maintenance required)

2. If resources are available, higher levels of assessment could be performed such as sewer televising, tank inspections, etc. in order to better define an Asset's condition.

3. Estimate the remaining useful life of each utility system Asset (refer to Asset definition in Section III).

    a. Estimate remaining life of each utility system Asset based on factors such as maintenance practices, type of materials, usage, and surrounding environment.
    b. Because useful service life of an Asset varies over time, it should be reevaluated on a regular basis.
    c. Industry standard useful life ranges can be referenced here on page 28 of the following document https://www.rd.usda.gov/files/UWP_Bulletin_1780-2.pdf

B. What is the value of the Asset?

1. The value of an Asset is the cost to replace the Asset after it has exhausted its useful life. It is important to factor inflation into the Asset's value with respect to the schedule for replacement.

C. What is the desired Level of Service?

1. Level of Service (LOS) defines the way in which utility stakeholders expect the utility system Assets to perform over the long term. Defining the LOS establishes the utility's goals. This is related to the consequence of failure in Section III.D.

2. This can be thought of as a performance target for a worst-case scenario. However, performance targets should be realistic targets based on regulatory requirements and customer needs and will help set the utility's goals.

    Example: for a major lift station in the collection system, it may be determined that it is not acceptable for the lift station not to function. Therefore, total redundancy should be provided as well as a regular maintenance plan developed and implemented for the pumps. The pumps should also be replaced prior to the end of their useful life, and not upon total lift station failure.

3. There is a direct link between the LOS provided and the cost to the customer.

4. The public or customers of the utility could be actively involved in the development of the desired LOS.

V. Evaluation and Implementation of Water and Energy Conservation Efforts as Part of the Plan

The federal Water Resources Reform and Development Act (WRRDA) requires an SRF Utility to evaluate and implement water and energy conservation efforts for the SRF-funded project. As a part of the AMP, the Utility applying for funding from the State's SRF Loan Program must include a brief discussion from the Preliminary Engineering Report's alternatives evaluation for the major project

components in which water and energy conservation was considered. If using SRF's Green Project Reserve Program, the discussion can be included from the associated business case.

VI. Plan for Maintaining, Repairing, and Replacing the Utility System's Assets and Plan for Funding

Finally, building on the components of the AMP developed above, a fiscal plan for the maintenance, repair, and replacement of the Assets should be discussed in the AMP along with a proposed funding structure to ensure funds are available as needed. The AMP may be used as the financial framework for the utility's future operating and capital budgets, impact fees, and utility rates. Refer to Appendix A, Tables 3, 4 and 5 for spreadsheets to assist with the compilation of this information.

A. The recommended period for fiscal planning is 20 years.

    1. Anticipated projects and updated Asset information should be updated each year so as to show current needs for the next 20 years.
    2. Changing conditions may reveal that some projects on the list can be pushed back for several years or others may need to be addressed sooner

B. Categories of improvements that should be considered:

    1. Fiscal needs related to future/upcoming regulations.
    2. Fiscal needs related to major Asset replacement.
    3. Fiscal needs related to system expansion.
    4. Fiscal needs related to system consolidation or regionalization.
    5. Fiscal needs related to improved technology to replace obsolete technology.
    6. Fiscal needs related to climate resiliency.

C. The following information is helpful when prioritizing an improvement project:

    1. Description of project.
    2. Brief statement regarding need for project.
    3. Year project is needed. Identify if year is absolute or flexible.
    4. Estimated total project cost.
    5. Explanation of how costs were estimated.
    6. Identification of funding source(s) considered available for project.
    7. Changes in overall operations that may occur as a result of the project.
    8. Impact of project on LOS.

D. This information is an input into the Financial Section of the AMP, wherein user rates and charges are reviewed to determine what is needed to provide sufficient revenues to cover operation, maintenance, replacement, capital improvement projects, and debt costs. This information should be supplied to the financial advisor/group completing the financial section of the AMP.

VII. AMP Schedule for SRF Projects

A. Include the AMP Certification, inclusive of the Cyber requirements, to the SRF when the PER is submitted. SRF requires an AMP Certification form which is inclusive of the requirements for a Fiscal Sustainability Plan (FSP) as defined by the criteria set forth in CWA Section 603 (d) (1) (E). The AMP should be completed prior to financing projects through the IFA. The actual AMP document should not be submitted to SRF but should be a stand-alone document and kept on site at the Utility's office. SRF intends to view the AMP when performing an onsite inspection.

VIII. Pulling It All Together

After all the data is gathered and evaluations are completed for the existing Assets, the next step is to prioritize the funding that is required to maintain the existing Utility system Assets as well as the new Assets included in the SRF funded project. A suggested method is as follows:

A. Create a spreadsheet listing all the individual Assets in one column. Subsequent columns may have the following headings:

1. Capacity/Size – Descriptive and can be used for grouping
2. Material – Descriptive and can be used for grouping
3. Manufacturer – Descriptive and can be used for grouping
4. Tag/Serial Number – Can be used for grouping
5. Original Cost – Cost to install the year it was installed
6. Replacement Cost – Cost to replace at end of useful life
7. Year Installed
8. Expected Useful Life in years
9. Remaining Useful Life in years
10. Condition of each System Asset – 1 through 5
11. Probability of Failure – 1 through 5
12. Consequence of Failure – 1 through 5
13. Criticality – 1 through 25
14. Notes – Expand on Consequence of Failure, Condition, etc.

B. The AMP Workbook Tool is available on the SRF website as an example spreadsheet. The workbook tool incudes tabs for inventory and assessment of Assets. These can be found in Appendix A and on SRF's website: https://www.in.gov/ifa/srf/2376.htm

C. Sort the utility system Assets by their Condition/Useful Life remaining ranking, highest ranking first.

D. Sort each of these by Criticality, highest risk ranking first.

E. Use the data to develop the 20-year fiscal plan. See the Financial Section of the AMP guidance.

Asset Management Program (AMP) Guidance

Managerial Section

Table of Contents

I. Introduction

The managerial components of an AMP address Utility structure, organization and support necessary to operate and maintain a water or wastewater system capable of consistently and responsibly meeting the needs of its users.

AMPs, as set out within this guidance, will provide a significant benefit to any Utility as a living document that is to be referenced, utilized and updated on a consistent basis. Effectively managed Utilities are more efficient, less fiscally volatile, have a reduced risk of system failure and are more insulated from loss of knowledge when compared to poorly managed Utilities. It is the intent of an AMP to facilitate and document management structures that can be usefully scaled to Utilities of any size.

Many of the managerial components from the AMP are likely to already exist. Each Utility shall be responsible for gathering or creating each of the documents below as a part of an effective AMP.

II. Property Documentation

In order to document ownership of Assets, include information on all deeds, titles, easements, leases and/or receipts for all properties in the Utility. Examples of facilities that should be documented include, but are not limited to the following:

- Water Utilities (as applicable)
  - Water Intake Facility
  - Groundwater Wells
  - Water Treatment Facilities
  - Water Storage Tanks
  - Booster Stations
  - Chemical Injection Facilities
  - Large Meters/Valves
  - Distribution System Easements
  - Access Easements
  - Maintenance or Billing Offices Owned by Utility
- Wastewater Utilities (as applicable)
  - Collection System Easements
  - Access Easements
  - Pump Stations
  - CSO Facilities (Outside of Wastewater Treatment Facilities)
  - Wastewater Treatment Facilities
  - Treatment Facility Outfall
  - Maintenance or Billing Offices Owned by Utility

A. Identify location(s) where property documentation is stored (i.e. Water Billing Office; Clerk Treasurer's Office, etc.)

B. Provide status of property documentation
    1. Confirm if property information for each facility is complete and accounted for.
    2. For any property information not complete, provide a status of documentation (e.g. all land ownership documented, easements in process) and provide a plan and timeline for completing documentation.

III. Operator Certifications and Licenses

Provide documentation of all Certified Operators employed by the Utility. Documentation shall be verified through the State of Indiana Search and Verify Website for Indiana Profession License Holders (https://mylicense.in.gov/everification/Search.aspx).

A. Table with Names, License Numbers, Issuance Dates, Expiration Date, Type of Classification for Each Certified Operator, and License Status should be included.
B. List Continuing Education Requirements for each Operator (i.e. based on Classification). Include what has been obtained and keep record up to date.

IV. Overview and Description of System

Include a non-technical summary of the water/wastewater system. Description information can typically be found at the following locations:

- National Pollutant Discharge Elimination System (NPDES) Permit (IDEM)
- Drinking Water (DW) or Wastewater Construction Permit and/or Design Summaries (IDEM)
- IDEM Drinking Water Branch Directory Information (https://myweb.in.gov/IDEM/DWW/Maps/Map_Template.jsp)
- Sanitary Survey (DW)
- O&M Manuals
- Past Preliminary Engineering Reports/Studies
- Monthly Report Data (MROs)

Description information shall include the following:

1. General description of type of treatment facility (including Class and list of treatment plant components, i.e. disinfection, aeration, clarification, fluoridation [DW], etc.) or distribution/collection system. State if treatment is by others.
2. Average Daily Demand - As indicated in NPDES/Construction Data or Current MRO/Metered Data
3. Minimum and Maximum Daily Flow/Demand - As indicated in NPDES/Construction Data or Current MRO/Metered Data
4. Number of Connections/Customers - Assumes that every property with a connection (DW or WW) is required to pay a minimum fee (therefore is a customer). If not, please document additional connections.
    a) Resources
        i. For DW, Service Connections for each water system can be found through the IDEM Drinking Water Branch Directory or Sanitary Survey (https://myweb.in.gov/IDEM/DWW/Maps/Map_Template.jsp)
        ii. Recent Billing Records
5. Population Served
    a) Resources
        i. For DW, population served for each water system can be found through the IDEM Drinking Water Branch Directory (https://myweb.in.gov/IDEM/DWW/Maps/Map_Template.jsp)
        ii. U.S. Census Data (http://factfinder.census.gov)
6. Water Source Type (DW)
    a) Surface Water – Include intake location information
    b) Groundwater – Include number of wells and general location
    c) Purchase Water – Indicate public water supply source if drinking water is purchased from another Utility. Include interlocal agreement(s).
7. Receiving Stream (NPDES Permitted Facilities)
    a) Effluent receiving streams for Wastewater Treatment Plant and/or High Rate Clarification
    b) Backwash receiving stream for Water Treatment Plants (if applicable)
8. Storage Capacity
    a) Water Storage Tanks (DW) – List number of tanks and total volume (gallons)
    b) Wet Weather Storage/Flow Equalization (Wastewater) - List number of facilities and total volume (gallons)
9. Sell Drinking Water
    a) Indicate other public water supply systems that utilize your Utility's water
    b) Include applicable interlocal agreement(s)
10. Treatment by Other Utilities (WW)
    a) If wastewater system is collection system only, indicate the wastewater Utility that receives the flow for treatment
    b) If Wastewater Utility receives flow from other wastewater systems, indicate those entities
    c) Include interlocal agreement(s)

11. Combined Sewer Overflow (CSO) vs. Non-CSO (WW)
    a) CSO
        i. Indicate number of CSOs
        ii. Indicate number and location of high rate clarification facilities (if applicable)
    b) Non-CSO
        i. If any SSOs are documented in NPDES permit, indicate number and approximate location
12. Pretreatment (WW) - Indicate if wastewater Utility is designated as a pretreatment system
13. Accounting of Infiltration/Inflow (I/I) and/or water loss

V. Operating Plan

As part of the AMP, a Utility should provide details regarding their operating structure and processes in a Utility Operating Plan. The Operating Plan details required are listed within this section.

Organizational Chart. The Utility Operating Plan should include an Organizational Chart.

A. Provide, as part of the Operating Plan, a copy of the Utility organizational chart. The chart should identify responsible parties and inter-party relationships.
    1. Include on the organizational chart the Utility Service Board or other executive group that 'owns' the Utility or establishes budget, operational characteristics and processes.
    2. All staff with pertinent licenses should be shown on the organizational chart.
    3. The organizational chart should show any contracted entities that perform a service for which the Utility relies on for operational capacity.
    4. Establish relationship with Legal Authority (entity responsible for ordinances, contracts, etc.)
B. If the Utility currently does not have an organizational chart, it is encouraged to produce a chart for inclusion in the Asset Management Program.

Job Duties. As part of the Utility operating plan, specific positions with work requirements should be identified. Each unique position should have performance needs described. Provide the job duties for each position type. The Job Duties portion should include:

A. A job title that corresponds to each position on the Utility organizational chart.
B. List training needs or certifications/licenses required for the job duties to be adequately performed. Training should include:
    1. Fundamental Mission, goals and policies.
    2. Mandatory training requirements identified for key employees.
    3. On-the-Job training progress and performance measurements.
    4. Confirm new employees should adequate training for the positions they occupy.
    5. Include any Continuing Education Requirements for pertinent registrations and licenses.
C. Include all internal communication routes and requirements to link specific job duties to others.

D. Provide a position summary.
E. Describe all essential duties and responsibilities, including any federal and/or state reporting requirements
F. Disclose probable working conditions.
G. See sample job description template in Appendix B.
H. For suggested staffing levels, refer to EPA's Guide for Evaluating Capacity, Management, Operation and Maintenance (CMOM) Programs of Sanitary Sewer Collection Systems. https://www3.epa.gov/npdes/pubs/cmom_guide_for_collection_systems.pdf
I. Identify tree of advancement opportunities and succession plan as appropriate for key positions.
J. Include a schedule of routine tasks, including reporting requirements.

Daily Operating Procedures should be captured within the Asset Management Program. Documentation of daily procedures prevents confusion between team members and can increase the team's efficiency. Documented procedures can also assist with gauging when to make capital improvements to the system and streamline regular maintenance activities.

A. Describe managerial processes (e.g. Biweekly meeting between department heads, etc.).
B. List regular maintenance activities for mechanical equipment.
C. List any regular communication.
D. Include as attached checklists or forms any regular or recurring work orders used by the Utility.

Operation and Maintenance Manuals. Equipment and systems purchased by the Utility should each be accompanied by Operation and Maintenance (O&M) Manuals. O&M Manuals should be stored digitally (with appropriate backup) and in hardcopy. Provide the storage locations of all O&M Manuals.

The following list is not exhaustive, but includes some equipment and systems that should be accompanied by O&M Manuals:

A. Pumps of any kind
B. Any treatment equipment/devices (includes active and passive systems)
C. Any vehicles or construction equipment
D. Supervisory Control and Data Acquisition (SCADA) systems or other control/operation software
E. Control panels
F. Testing and sampling equipment

VI. Written Procedures

A. Security, including cyber security
    1. Establish access security measures for facilities (Consider use of cameras and personalized key cards and/or pass codes)
    2. Establish record storage, access, and disposal process
    3. Establish cyber security procedures including SCADA systems

4. Perform an annual Cyber Security Vulnerability Assessment (information located in Appendix C)
5. Establish reporting procedures for security breaches
6. A Cyber Security Checklist is located in Appendix C

B. Personal Access/User Rights for System Equipment/Computers/Controls/SCADA including the following:
   1. Unrestricted facility access
   2. Accompanied facility access
   3. Equipment use limits
   4. Procedure for addition or removal of access/use

C. Customer Complaints including the following:
   1. Customer complaint reporting procedures
   2. Identification of customer complaint response personnel
   3. Training for Utility personnel that will address complaints
   4. Customer complaint response procedures
   5. Involving Utility regulatory agency on complex complaints

D. Purchasing Authority
   1. Identify who has purchasing authority and dollar limits
   2. Define who can add/remove Utility personnel to/from accounts
   3. Procedure for verifying satisfactory completion of work prior to payment
   4. Approval process for spending Utility revenue on non-Utility expenses

E. Internal Controls (checks and balances)
   1. Establish process for internal and external review of execution of written procedures
   2. Establish what would be a conflict of interest for review of execution of written procedures

F. Customer Deposits/Payments
   1. Establish payment methods and accounting procedures
   2. Identify personnel who can receive payments
   3. Establish process for deposits of funds and accounting procedures

G. Collections
   1. Establish late payment procedures
      a) Notification of non-payment
      b) Notification of disconnect date
      c) Disconnect procedure for Utility personnel
   2. Define and establish process for handling delinquent accounts
   3. Establish procedure for restoring services
   4. Establish procedure for “Theft of Services”

H. Connection Charges (new water tap or sewer connections)
   1. Establish procedures for adding new customers including the following:
      a) Customer check list
      b) Pre/post inspections
      c) Fees
      d) Approval process

e) Restrictions

2. Establish procedures for upgrading existing customers connects including the following:
    a) Customer check list
    b) Pre/post inspections
    c) Fees
    d) Approval process
    e) Restrictions

I. Routine Billing – AMR, AMI, monthly/quarterly billing
    1. Establish standard billing and payment process
    2. Establish process for Billing disputes

J. Use ordinances
    1. Identify ordinances required by regulation and others as needed
    2. Establish ordinance review process and frequency of review

K. Training and Safety
    1. Identify minimum Federal and State training requirements
    2. Identify required safety equipment
    3. Establish written work procedures as needed
    4. Establish accident and injury reporting process

VII. External Contact Information

This Section includes a list of external contact information for emergency, permits and compliance, suppliers, and other purposes. This list should be reviewed on a quarterly basis and revised when updated contact information is available or received from the respective organizations.

The Utility list should be revised as applicable for various types of local Utilities. Please reference example table below.

EXTERNAL CONTACT INFORMATION							
Contact Type	Name & Title	Organization	Address	Telephone			
				Phone	Fax	Cell	Website
Emergency							
Police							
Fire							
Hospital							
Accidents/Safety Violations							
Permits/Compliance							
Permit Violations							
Spill Reporting							
Chemical Handling							
Traffic Control and Site Safety							
Other							
Utilities - 811 - Know what's BELOW - CALL before you dig							
Electric							
Gas							
Telephone							
Drinking Water							
Wastewater (Sanitary Sewers)							
Stormwater (Storm Sewers)							
Cable							
Communications							
Fiber Optic							
Petrroleum							
Other							
Suppliers							
Other Contact Information							

VIII. Internal Contracting and Purchasing Procedures

A budget is one of the most important components of an effective AMP. A key element of the operations budget is the tracking of costs in order to have accurate records each time the annual operating budget is developed. Having an annual baseline provides documentation for future budget considerations and provides justification for future rate increases.

The cost of preventive and corrective maintenance and major collection system repairs and alterations are key items in the annual operating budget. The collection system owner or operator should keep adequate records of all maintenance costs, both in-house and contracted, plus the costs for spare parts. This will assist in the preparation of the following year's budget. In general, there should be an annual (12-month cycle) budget of discretionary and non-discretionary items.

The major categories of operating costs are labor, Utilities, and material supplies. Cost accounting for these categories should include information on unit costs, total costs, and the amount and/or quantities used. Internal contracting and purchasing procedures must therefore be developed and followed for efficient tracking of the operational and maintenance costs. Each community typically develops these procedures for both routine and emergency situations based on their past governmental experience and community regulations and/or ordinances. A typical process is to create a Work Order and issue a

Purchase Order for the work to be performed. Preparation of the Work Order is very important while thinking about the O&M strategy and asset management. The Work order allows the reviewer to know:

A. If this maintenance was planned or unplanned
B. The actual labor and materials cost included in the expense
C. What was done to complete the work order
D. Why the asset failed
E. The impact that this work order had on customers

A Work Order template is included in Appendix D.

Provide procedures for emergency contracting and/or purchasing including:

A. Authorization
B. Budget Limit
C. Existing on-call agreements

Asset Management Program (AMP) Guidance

Financial Section

Table of Contents

I. Introduction

This Section provides the guidelines for development of the required Financial requirements of the AMP. The Utility must develop and implement a Financial Plan that includes the following minimum requirements:

1. Forward-looking cash flow analysis
2. Historical financial statements
3. Listing of all outstanding debt with funding source and security
4. Last bond rating agency report
5. Current annual budget
6. Current rate ordinance and rate structure
7. Date of last rate review/examination/audit
8. Collection procedures for delinquent accounts

The purpose of the information in this Financial Section is to provide the Utility with financial information and forward-looking cash flow planning model that can be modified from time-to-time as different infrastructure needs arise and priorities change. As such, it should be considered a living document with the information updated periodically. Appendix E includes sample tables that can assist in the compilation of information listed in this portion of the AMP.

II. Forward Looking Cash Flow Analysis

The financial model will be helpful to assist Utility management to develop a plan to fund the future infrastructure needs detailed in the AMP. The long-term financial plan prepared by the Utility's municipal advisor should match the planning period covered in the AMP. It should also show the annual rate increases necessary to finance all of the revenue requirements of the Utility including any necessary bond issues and the resulting future debt service. The Forward-Looking Cash Flow Analysis should be updated at a minimum of every 5 years. See example for reference.

The minimum requirements for the Forward Looking Cash Flow Analysis are as follows:

1. Revenues by line item which should match the Utility's historical financial statements. Normal revenues include but are not limited to:
    a. Revenues by user type, if available.
        i. Residential
        ii. Commercial
        iii. Industrial
        iv. Multi-family
        v. Wholesale
    b. Fire protection
    c. Forfeited discounts/penalties
    d. Excessive strength surcharges
    e. System development charges fees
    f. Interest Income
    g. Other
2. Customer growth, if any
    a. Historical and future assumptions

3. Collection rates
    a. Historical and future assumptions
4. Operating expenses (by function if available) by line item which should match the Utility's historical financial statement. Normal expenses include but are not limited to:
    a. Salaries and wages
    b. Employee benefits
    c. Purchased power
    d. Chemicals
    e. Sludge removal
    f. Repairs and maintenance
    g. Materials and supplies
    h. Contractual services
    i. Insurance
    j. Rent
    k. Transportation
    l. Other
5. Future expense assumptions including assumed annual inflation rate
6. Capital improvement plan for the AMP period
7. Estimated project costs and funding schedule for bond funded projects
8. Outstanding bond debt service (Include amortization schedules)
9. Proposed bond debt service (Include amortization schedules)
    a. Debt assumptions – terms, rates, funding source
10. Outstanding lease payments (Include amortization schedules)
11. Combined debt service schedule
12. Outstanding and proposed debt service reserve requirements
13. Capital improvement plan expenditures from rates and charges
14. Payment in lieu of property taxes and other transfers if applicable
15. Each year's cash flow should result in an increase/(decrease) in cash and cash equivalents and also have a beginning and ending balance. The ending balance for cash and cash equivalents should not go below the minimum required balance for operating cash and cash equivalents as determined by the Utility. The ending balance for cash and cash equivalents should not result in a negative balance.
16. Resulting rate increase required to fund requirements
17. Resulting average user rates assuming 4,000 gallons per month
18. Resulting debt service coverage meeting or exceeding SRF requirements

III. Historical Financial Statements

1. Historical financial statements should be included for the last three years

2. Audits

    a. Prior to completing a drinking water or sewer infrastructure financing with SRF on or after July 1, 2019, an SRF Loan Recipient must submit, along with a standard SRF Due Diligence package, audited financial statements of the SRF Loan Recipient (an "Audit") performed by the Indiana State Board of Account or another independent public accountant of the calendar year ending no later than two years prior the SRF loan

closing date. The SRF Loan Program will no longer accept reviews or examinations; rather, instead, the SRF Loan Program will require that all SRF Loan Recipients submit to the SRF Loan Program an Audit of one the last two calendar years. Thus, prospective SRF Loan Recipients submitting an application are advised and encouraged to begin or continue undertaking the steps necessary to assure their Audit(s) are performed at an early enough stage so as to not delay completing a project financing with the SRF Loan Program.

i.

b. Beginning July 1, 2018, the standard SRF financial assistance loan agreement will include a requirement such that the SRF Loan Recipient will be required to prepare and submit an Audit every two years throughout the life of the repayment of the debt to the SRF Loan Program.

IV. Outstanding Long-Term Bonds and Leases

Provide a listing of the outstanding debt noting the funding source, security and bond rating.

V. Other Items

Attach or describe the other documents including:

1. Last bond rating agency report
2. Current annual budget
3. Current rate ordinance and rate structure
4. Date of last review

Appendix A

Technical Section – Workbook Tool

Asset Management Program Workbook Tool

Asset Management Program Team Template

Utility Information

Utility Name:	Anytown Utilities Department
Street Address:	123 River Road
City:	Anytown, IN
Zip Code:	47999
Phone Number:	740-867-5309
Email:	utilities@anytownin.gov

NPDES Number:
Number of Connections:
Number of Customers:

Personnel

Contact Person:
Title:
Role:
Email:

Team Member:
Title:
Role:
Email:

Team Member:
Title:
Role:
Email:

Team Member:
Title:
Role:
Email:

Team Member:
Title:
Role:
Email:

Team Member:
Title:
Role:
Email:

Table 1a
Sample List of Assets

Sample Wastewater Utility

Collection Assets
- Northwest Sewershed
  - 8"
- Northeast Sewershed
  - 8"
  - 10"
- Main Street Pump Station
  - copy from FSP but no screening
- Force Main
- South Sewershed
  - 8"
  - 10"
  - 12"

Treatment Assets
- Headworks - screens in building, no grit, no pumping
- 24" pipe
- Oxidation ditches
- 24" pipe
- Final clarifier splitter
- 24" pipe
- Final clarifiers
- 24" pipe
- Ultraviolet disinfection
- 24" pipe to outfall
- RAS pump station
- 8" force main
- WAS actuated valve
- 6" force main
- Sludge holding tank
- Dewatering building - feed pump, belt press, to landfill
- Admin building - with lab
- Drives, sidewalks, drainage
- Generator

Asset Inventory **Table 1**

Utility Name:	**Wastewater**
Current Plan Year:	**2018**

Directions:

A. List assets
B. Enter asset information
C. To add more assets use insert function and add rows then copy first asset row to new rows to transfer formulas
D. Enter information in yellow cells
E. Remaining cells will calculate automatically.

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Collection Assets	**Capacity / Size**	**Material**	**Manufacturer**	**Tag Number (Optional)**	**Original Cost**	**Replacement Cost**	**Year Installed**	**Expected Useful Life in Years**	**Remaining Useful Life in Years**	**Condition**	**Probability of Failure**	**Consequence of Failure**	**Criticality**
Enter asset													0
Enter asset													0
Enter asset													0
Enter asset													0
Enter asset													0
Enter asset													0
Collection Assets Subtotal						**$0**	**$0**						

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Treatment Assets	**Capacity / Size**	**Material**	**Manufacturer**	**Tag Number (Optional)**	**Original Cost**	**Replacement Cost**	**Year Installed**	**Expected Useful Life in Years**	**Remaining Useful Life in Years**	**Condition**	**Probability of Failure**	**Consequence of Failure**	**Criticality**
Main Street Pump Station													
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Wastewater Treatment Plant													
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Enter asset									-2018				0
Treatment Assets Subtotal					**$0**	**$0**							
Total of All Collection and Treatment Assets					**$0**	**$0**							

Asset Rating Table 2

Column K

Condition Assessment	
Condition Rating	**Description**
5	Unserviceable/End of useful life - Over 50% of asset requires replacement
4	Significant Deterioration - 20-40% requires renewal/upgrade
3	Moderate Deterioration - 10-20% requires significant maintenance
2	Minor Deterioration - Requires minor maintenance
1	New or Excellent Condition - Only normal maintenance required

Column L

Probability of Failure	
Performance Rating	**Description**
5	Imminent - Likely to occur in the near future
4	Probable - Likely to occur several times in the life of an item
3	Occasional - Likely to occur sometime in the life of an item
2	Remote - Unlikely but possible to occur in the life of an item
1	Improbable - So unlikely, it can be assumed occurrence may not be experienced

Column M

Consequence of Failure	
Performance Rating	**Description**
5	Catastrophic disruption
4	Major disruption
3	Moderate disruption
2	Minor disruption
1	Insignificant disruption

Replacement and/or Rehabilitation Expenses Table 3

Directions:

A. List assets to be replaced or rehabilitated
B. Determine how long before action must take place
C. Enter cost to replace or rehabilitate
D. Enter "C" in column D for large replacement expenses that would be funded as a capital project separate from the reserve money set aside each year.
E. To add more replacement expenses, use insert function and add rows then copy first line item row to new rows to transfer formulas
F. Enter information in yellow cells
G. Remaining cells will calculate automatically.

Guidance Note:

Include items here that will need to be replaced during the normal course of operating the system.

Include only the items from the Asset Inventory (Table 1) with a remaining useful life less than 20 years.

A	B	C	D	E	F	G
Projects	**Remaining Useful Life in Years**	**Replacement Cost**	**R = Use Reserve C = Capital Expense**	**Reserve Required Each Year**	**Future Capital Funds Required**	**Potential Funding Source**
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Enter asset to be replaced				$ -	$ -	
Total Replacement Expenses Required in the Current Year				**$ -**		
Total Future Capital Funds Required					**$ -**	

Future Improvement Expenses — Table 4

Directions:

A. List projects to be completed
B. Determine how long before the project must begin
C. Enter the total projected cost of the project
D. Enter "C" in column D for large replacement expenses that would be funded as a capital project separate from the reserve money set aside each year.
E. To add more improvement expenses, use insert function and add rows then copy first row to new rows to transfer formulas
F. Enter information in yellow cells.
G. Remaining cells will calculate automatically.

Guidance Note:

Include improvements here which are related to:
1. Future/upcoming regulations
2. Major asset replacement, such as structures, tanks, or interceptors
3. System expansion to provide additional capacity or service area
4. System consolidation or regionalization
5. Improved technology to replace obsolete technology
6. Climate resiliency

Include only projects expected to occur within the next 20 years.

A	B	C	D	E	F	G
Projects	**Years Until Project Must Begin**	**Cost**	**R = Use Reserve C = Capital Expense**	**Reserve Required Each Year**	**Future Capital Funds Required**	**Potential Funding Source**
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Enter project	0	$ -		$ -	$ -	
Total Improvement Expense Required in the Current Year				**$ -**		
Total Future Capital Funds Required					**$ -**	

Total Reserve Required for Facility Improvement Project
Table 5

Directions:

A. Total Reserve Required will calculate automatically from the total replacement and total improvement expenses in Tables 3 and 4 respectively.
B. If reserve provided does not cover the total reserve required, additional funding for replacement and future improvement is needed

Total Reserve Required Each Year	**$0**

Total Future Capital Funds Required	**$0**

Appendix B

Managerial Section – Sample Job Description Example/Template

Job Description

Example/Template

Job Title:	Operational Operator
Department:	Operations
Direct Manager/Supervisor:	Head Operator
Description Updated:	2018

POSITION SUMMARY

Licensed Operator with five or more years of design or field experience required. Responsible for project quality, schedule and budget. Project Manager Capabilities.

ESSENTIAL DUTIES AND RESPONSIBILITIES

- Operate
- Turn wrench
-
-
-

EDUCATION and/or EXPERIENCE

- Must possess Operators License. 5+ years' experience preferred. Continuing education to remain current with area of responsibility.
- 5 years-experience in related field.
- Strong verbal communications skills and the ability to effectively present information and respond to questions from groups of managers, equipment suppliers, contractors/consultants, and the general public are necessary.
- A strong understanding of operations.
- Ability to apply common sense understanding to carry out instructions.

WORK ENVIRONMENT AND PHYSICAL REQUIREMENTS

While performing the duties of this job, the employee is consistently outdoors and some physical exertion may be necessary.

Appendix C

Managerial Section – Cyber Security Information and Checklist

INDIANA FINANCE AUTHORITY

CYBER SECURITY PLAN CHECKLIST

INTRODUCTION

This document is a checklist of recommendations for maintaining the overall Cybersecurity posture of Water and/or Wastewater Treatment operations. At least twice a year, the utility should verify that people, systems and software continue to align with the cybersecurity plan. The checklist has been established for the utility to become compliant with Indiana Senate Enrolled Act 362.

This document and recommended actions in creating a cyber security plan are taken from EPA Water Sector Cybersecurity Brief for States and Indiana Department of Homeland Security Leadership for a Safe and Secure Indiana Cyber Security for Employees Fact Sheet.

Implementing cybersecurity best practices is critical for water and wastewater utilities. Cyber-attacks are a growing threat to critical infrastructure sectors, including water and wastewater systems. Many critical infrastructure facilities have experienced cybersecurity incidents that led to the disruption of a business process or critical operation.

CYBER THREATS TO WATER AND WASTEWATER SYSTEMS

Cyber-attacks on water or wastewater utility business enterprises or process control systems can cause significant harm, such as:

- Upset treatment and conveyance processes by opening and closing valves, overriding alarms or disabling pumps or other equipment;
- Deface the utility's website or compromise the email system;
- Steal customers' personal data or credit card information from the utility's billing system; and
- Install malicious programs like ransomware, which can disable business enterprise or processcontrol operations.

These attacks can: compromise the ability of water and wastewater utilities to provide clean and safe water to customers, erode customer confidence, and result in financial and legal liabilities.

BENEFITS OF A CYBERSECURITY PROGRAM

The good news is that cybersecurity best practices can be very effective in eliminating the vulnerabilities that cyber-attacks exploit. Implementing a basic cybersecurity program can:

- Ensure the integrity of process control systems;
- Protect sensitive utility and customer information;
- Reduce legal liabilities if customer or employee personal information is stolen; and
- Maintain customer confidence.

CHALLENGES FOR UTILITIES IN STARTING A CYBERSECURITY PROGRAM

Many water and wastewater utilities, particularly small systems, lack the resources for information technology (IT) and security specialists to assist them with starting a cybersecurity program. Utility personnel may believe that cyber-attacks do not present a risk to their systems or feel that they lack the technical capability to improve their cybersecurity.

Basic cybersecurity best practices can be carried out by utility personnel without specialized training, and user-friendly resources are available to help. The Cybersecurity & Infrastructure Security Agency (CISA) Cyber Vulnerability Scanning tool can be used to determine strengths and weaknesses within the utility's cyber infrastructure. Information related to this tool is located here. A CISA fact sheet is provided in this appendix for reference.

CHECKLIST FOR CYBERSECURITY

IDENTIFY

- ☐ Keep an inventory of control system devices and ensure this equipment is not exposed to networks outside the utility
  - Never allow any machine on the control network to "talk" directly to a machine on the business network or on the Internet
- ☐ Write down the roles and responsibilities of all personnel including Managers, Operators, Clerks, Superintendents, Council Members, and Suppliers
- ☐ Identify the critical service of the utility and the minimum requirements to support the delivery of the critical service
- ☐ Identify the legal and regulatory requirements of the utility
- ☐ Conduct a risk assessment that identifies asset and data vulnerabilities, internal and external vulnerabilities, and the potential business impacts
  - Assets include physical assets, including computers, mobile devices
  - Data may include personal information related to customers or operations information
- ☐ Establish a risk management strategy that identifies the level of protection required for different information and operation and provides the implementation strategy to protect the information and operations and subsequently monitor the protection.

PROTECT

- ☐ Segregate any SCADA networks from business networks and apply firewalls
  - Classify IT assets, data, and personnel into specific groups, and restrict access to these groups.
- ☐ Use secure remote access methods
  - A secure method, like a virtual private network, should be used if remote access is required.
- ☐ Establish roles to control access to different networks and log system users
  - Based on job functions (role-based)
  - Lock the screen on computers when leaving the area
  - Keep devices physically locked up while travelling
- ☐ Require and enforce strong passwords and password management practices and policies
  - Use strong passwords, at least 8 characters
  - Have different passwords for different accounts.
  - Requires passwords to be changed regularly
  - Remember passwords; do not write them down
- ☐ Stay aware of vulnerabilities and implement patches and updates when needed
  - Monitor for and apply IT system patches and updates.
  - Update antivirus software on all devices
- ☐ Enforce policies for the security of devices
  - Limit the use of mobile devices on your networks and ensure devices are password protected.
- ☐ Have an employee cybersecurity training program
  - All employees should receive regular cybersecurity training

- Do not open unsolicited or unknown emails

☐ Involve utility executives in cybersecurity

- Organizational leaders are often unaware of cybersecurity threats and needs.

DETECT

☐ Monitor for anomalies and events

- Establish a baseline of network operations and expected data flow, analyze detected events to understand targets and methods, and determine the impact of the event
- Establish when an incident gets reported (alert thresh-hold)
- See attached Steps for Responding to a Suspected Cyber Incident at a Water or Wastewater Utility

☐ Continuously monitor for network intrusions and have a plan in place to respond

- Monitor the physical environment, personnel activity, external service provider activity, unauthorized personnel, connections, devices and software
- Perform vulnerability scans
- Be capable of detecting a compromise quickly and executing an incident response plan.
- Stay informed on latest risks

☐ Implement detection processes

- Define the roles and responsibilities for detection and communicate the event detection information
- Test the detection process
- Register for cyber security alerts and advisories from water sector and government partners
- Ensure the control system network is separated from the public network

RESPOND

☐ Develop a Response Plan to ensure that staff is aware of security policies and incident response/notification procedures

- See attached Steps for Responding to a Suspected Cyber Incident at a Water or Wastewater Utility

☐ Communicate

- Incidents are reported and information is shared in accordance with the established criteria

☐ Analysis

- Investigate and categorize the incidents
- Establish procedures to receive, analyze and respond to vulnerabilities

☐ Contain and mitigate the incident

RECOVER

☐ Develop a Recovery Plan that includes processes and procedures to ensure the restoration of systems and assets affected by the incident

☐ Improve recovery and update recovery strategies by incorporating lessons learned

☐ Communicate recovery activities to internal and external stakeholders, managerial teams, and the public

Steps for Responding to a Suspected Cyber Incident at a Water or Wastewater Utility

Response

1. Disconnect compromised computers from the network. Do *not* turn off or reboot systems.
2. Assess the scope of the compromise, and isolate all affected IT systems.
3. Open a ticket with your antivirus software or security service vendor.
4. Assess any potential damage, including impacts to treatment processes or service disruptions.
5. Initiate manual operation of equipment if control systems have been compromised.
6. Distribute any advisories or alerts to customers as needed, including customers whose records may have been compromised.
7. Identify methods to scan all IT assets to eradicate malicious code. Assess and implement recovery procedures.

Reporting

1. Report the incident to local law enforcement and the primary oversight agency (typically, the state).
2. Contact the National Cybersecurity and Communications Integration Center (NCCIC) at 888-282-0870 or NCCIC@hq.dhs.gov. NCCIC can assist your utility with identifying and restoring affected systems, coordinating federal assistance, and improving security.
3. Submit an incident report through WaterISAC (analyst@waterisac.org; 866-H2O-ISAC).

Important Contact Information

Role	Point of Contact	Phone Number	Email
IT service vendor			
Local law enforcement			
State agency			
National Cybersecurity and Communications Integration Center (NCCIC)		888-282-0870	NCCIC@hq.dhs.gov
WaterISAC		866-426-4722 (866-H2O-ISAC)	analyst@waterisac.org

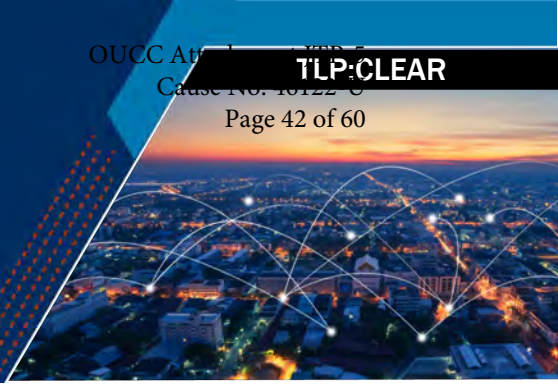
For More Information

For more information on available cybersecurity guidance and resources:

- WaterISAC 10 Basic Cybersecurity Measures: Best Practices to Reduce Exploitable Weaknesses and Attacks
- Department of Homeland Security Critical Infrastructure Cyber Community Voluntary Program
- American Water Works Association (AWWA) Cybersecurity Guidance and Tool
- https://www.epa.gov/homeland-security-research/water-system-security-and-resilience-homeland-security-research

TLP:CLEAR

Top Cyber Actions for Securing Water Systems



Overview

Water and Wastewater Systems Sector entities (herein referred to as "water systems") run operational technology (OT) and information technology (IT) systems that are too often vulnerable to cyberattacks. This fact sheet highlights the top cyber actions water systems can take today to reduce cyber risk and improve resilience to cyberattacks and provides free services, resources, and tools to support these actions, which can be taken concurrently.[1,2,3] Visit CISA's Water and Wastewater Systems Cybersecurity and EPA's Cybersecurity for the Water Sector webpages for more information and resources.

Buyer beware: Technology manufacturers make security choices that affect the quality of their software and hardware. Review CISA's Secure by Design guidance and ask your vendors how they are adopting the secure by design principles and tactics within their products to mitigate cybersecurity threats.

1. Reduce Exposure to the Public-Facing Internet

Use cyber hygiene services to reduce exposure of key assets to the public-facing internet. OT devices such as controllers and remote terminal units (RTUs) are easy targets for cyberattacks when connected to the internet.

- **Free resource**: CISA's Free Cyber Vulnerability Scanning for Water Utilities fact sheet explains the process and benefits of signing up for CISA's free vulnerability scanning program.
- **Free service:** Email vulnerability@cisa.dhs.gov with the subject line, "Requesting Cyber Hygiene Services" for CISA Cyber Hygiene Services, which proactively identify and enable timely mitigation of internet-exposed assets.

2. Conduct Regular Cybersecurity Assessments

Conduct a cybersecurity assessment on a regular basis to understand the existing vulnerabilities within OT and IT systems. Assessments enable you to identify, assess, and prioritize threats to vulnerabilities in both OT and IT networks.

- **Free service:** EPA Cybersecurity Assessments can help assess cybersecurity posture.
- **Free resource:** CISA's Cross-Sector Cybersecurity Performance Goals (CPGs) provide a set of baseline cyber protections. CISA provides a free CPG assessment that can be administered by a CISA cybersecurity advisor (listed at CISA Regions | CISA) or through a self-assessment.

3. Change Default Passwords Immediately

Require unique, strong, and complex passwords for all water systems, including connected infrastructure. Weak default or insecure passwords are easy to discover and exploit, and they may allow cyber threat actors to make changes to a water systems' operational processes. This can negatively impact public health and safety. Change default or insecure passwords and implement multifactor authentication (MFA) where possible. Focus on deploying MFA to IT infrastructure, such as email, to make it difficult for threat actors to access OT systems. Consider asking manufacturers to eliminate default passwords.

- **Free resources:** CISA's Secure our World Campaign: Use Strong Passwords and More than a Password Campaign. For additional cyber guidance, see CISA's Cyber Guidance for Small Businesses.

[1] The Cybersecurity and Infrastructure Security Agency (CISA), Environmental Protection Agency (EPA), and Federal Bureau of Investigation (FBI) jointly authored this fact sheet.
[2] Joint FBI-CISA-NSA-EPA-INCD Advisory: IRGC-Affiliated Cyber Actors Exploit PLCs in Multiple Sectors, Including U.S. WWS Facilities
[3] Joint FBI-CISA-EPA-NSA Cybersecurity Advisory: Ongoing Cyber Threats to U.S. Water and Wastewater Systems

TLP:CLEAR

4. Conduct an Inventory of OT/IT Assets

Create an inventory of software and hardware assets to help understand what you need to protect. Focus initial efforts on internet-connected devices and devices where manual operations are not possible. Use monitoring to identify the devices communicating on your network.

- **Free service:** EPA's Cybersecurity Technical Assistance Program supports you in conducting an inventory.
- **Free tool:** A first step in conducting an inventory is identifying the devices on the network. CISA's Malcolm tool enables network monitoring with custom parsers designed for industrial control system (ICS)/OT protocols.

5. Develop and Exercise Cybersecurity Incident Response and Recovery Plans

Develop

Understand incident response actions, roles, responsibilities, as well as who to contact and how to report a cyber incident before one occurs to ensure readiness against potential targeting.

- **Free resources**: EPA's Cybersecurity Action Checklist and CISA's Incident Response Plan (IRP) Basics help to develop cyber incident response plans. The Joint CISA-FBI-EPA Water Incident Response Guide provides valuable information on how to work with federal response partners before, during, and after a cyber incident. **Note:** See this guide for contact information for CISA, FBI, and the EPA Water Infrastructure and Cyber Resilience Division.

Exercise

Test your incident response plan annually to ensure all operators are familiar with roles and responsibilities.

- **Free tools:** CISA Tabletop Exercise Package (CTEP) and EPA tabletop exercise (TTX) scenario tools assists critical infrastructure owners and operators in developing their own tabletop exercises to meet their specific needs.

6. Backup OT/IT Systems

Regularly backup OT/IT systems so you can recover to a known and safe state in the event of a compromise. Test backup procedures and isolate backups from network connections. Implement the NIST 3-2-1 rule: 3) Keep three copies: one primary and two backups; 2) Keep the backups on two different media types; 1) Store one copy offsite.

- **Free resources:** CISA's Cyber Essentials Toolkit Chapter 5: Your Data and NIST's Protecting Data From Ransomware and Other Data Loss Events provide guidance on backing up your systems.

7. Reduce Exposure to Vulnerabilities

Mitigate known vulnerabilities and keep all systems up to date with patches and security updates. Prioritize OT patches in accordance with CISA's Known Exploited Vulnerabilities (KEV) catalog during scheduled downtime of OT equipment; prioritize patches in IT, as applicable. CISA's Secure our World Campaign provides guidance on updating software.

8. Conduct Cybersecurity Awareness Training

Conduct cybersecurity awareness training annually, at a minimum, to help all employees understand the importance of cybersecurity and how to prevent and respond to cyberattacks.

- **Free resources:** See EPA Cybersecurity Training and CISA's free Industrial Control Systems cybersecurity virtual training to learn how to protect against cyberattacks to critical infrastructure. Also see CISA's Secure our World Campaign: Employee Phishing Training for practical steps to help your employees avoid phishing scams.

Support

If you require additional support for implementing any of these actions, contact EPA and/or your regional CISA cybersecurity advisor for assistance.

Appendix D

Managerial Section –Work Order Template

WORK ORDER

Work Order No.:_____ Date:_____

Work Order Type: Planned:_____Unplanned:_____

Equipment Name: _____Equipment No,:_____

Work To Be Performed:

Job Estimate:

1. Labor: $_____
2. Plant: $_____
3. Material: $_____

Work Performed By:

1. _____
2. _____
3. _____
4. _____

Procedures Followed:

Primary Cause of Failure:

Impact on Customers:

Other Issues:

Signed:_____

Date:_____

Comments:

Appendix E

Financial Section – Sample Tables

ANYTOWN WATER UTILITY/SEWAGE WORKS

UTILITY CAPITAL IMPROVEMENT PLAN

	Estimated Project Year										
Capital Improvement Categories:	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Totals
Gravity and pressure lines			$50,000		$100,000	$125,000					$275,000
Valves, hydrants, fittings, backflow preventors, sample stations, chemical feed points, manholes, inlets	$10,000	$10,000	10,000	$10,000	10,000	10,000	$10,000	$10,000	$10,000	$10,000	100,000
Lead lines as identified						100,000					100,000
Booster/lift stations	25,000			100,000			50,000			225,000	400,000
Water or wastewater treatment plants									1,000,000	1,000,000	2,000,000
Water or wastewater storage facilities					500,000						500,000
Meters	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	75,000
Wells						300,000					300,000
CSO outfalls and diversion structures											-
Other	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	500,000
Totals	92,500	67,500	117,500	167,500	667,500	592,500	117,500	67,500	1,067,500	1,292,500	4,250,000
Less assumed bond funding					(550,000)	(475,000)			(1,000,000)	(1,200,000)	(3,225,000)
Net Rate Fund Capital	$92,500	$67,500	$117,500	$167,500	$117,500	$117,500	$117,500	$67,500	$67,500	$92,500	$1,025,000

Note: These are samples of standard capital improvements. Add other improvements as necessary.

(Continued on next page)

ANYTOWN WATER UTILITY/SEWAGE WORKS

(Cont'd)

UTILITY CAPITAL IMPROVEMENT PLAN

		Estimated Project Year										
Capital Improvement Categories:	Sub-totals	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	Totals
Gravity and pressure lines	$275,000			$50,000		$100,000		$125,000	$100,000	$100,000	$100,000	$850,000
Valves, hydrants, fittings, backflow preventors, sample stations, chemical feed points, manholes, inlets	100,000	$10,000	$10,000	10,000	$10,000	10,000	$10,000	10,000	10,000	10,000	10,000	200,000
Lead lines as identified	100,000		50,000									150,000
Booster/lift stations	400,000	25,000			100,000			25,000			250,000	800,000
Water or wastewater treatment plants	2,000,000											2,000,000
Water or wastewater storage facilities	500,000											500,000
Meters	75,000	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	150,000
Wells	300,000										100,000	400,000
CSO outfalls and diversion structures	-											-
Other	500,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	1,000,000
Totals	4,250,000	92,500	117,500	117,500	167,500	167,500	67,500	217,500	167,500	167,500	517,500	6,050,000
Less assumed bond funding	(3,225,000)											(3,225,000)
Net Rate Fund Capital	$1,025,000	$92,500	$117,500	$117,500	$167,500	$167,500	$67,500	$217,500	$167,500	$167,500	$517,500	$2,825,000
Average annual rate funded capital improvements												$141,300

Note: These are samples of standard capital improvements. Add other improvements as necessary.

ANYTOWN WATER UTILITY/SEWAGE WORKS

**SCHEDULE OF AMORTIZATION OF $2,955,000 PRINCIPAL AMOUNT
OF OUTSTANDING [SEWAGE WORKS/WATERWORKS] REVENUE BONDS OF 2012**

Payment Date	Principal Balance	Principal	Interest Rate	Debt Service		Bond Year Total
	(-----In $1,000's-----)		(%)	Interest	Total	
				(----------In Dollars----------)		
07/01/18	$2,955	$70	3.00	$44,325.00	$114,325.00	
01/01/19	2,885	75	3.00	43,275.00	118,275.00	$232,600.00
07/01/19	2,810	75	3.00	42,150.00	117,150.00	
01/01/20	2,735	75	3.00	41,025.00	116,025.00	233,175.00
07/01/20	2,660	75	3.00	39,900.00	114,900.00	
01/01/21	2,585	80	3.00	38,775.00	118,775.00	233,675.00
07/01/21	2,505	80	3.00	37,575.00	117,575.00	
01/01/22	2,425	80	3.00	36,375.00	116,375.00	233,950.00
07/01/22	2,345	80	3.00	35,175.00	115,175.00	
01/01/23	2,265	85	3.00	33,975.00	118,975.00	234,150.00
07/01/23	2,180	85	3.00	32,700.00	117,700.00	
01/01/24	2,095	85	3.00	31,425.00	116,425.00	234,125.00
07/01/24	2,010	85	3.00	30,150.00	115,150.00	
01/01/25	1,925	90	3.00	28,875.00	118,875.00	234,025.00
07/01/25	1,835	90	3.00	27,525.00	117,525.00	
01/01/26	1,745	90	3.00	26,175.00	116,175.00	233,700.00
07/01/26	1,655	90	3.00	24,825.00	114,825.00	
01/01/27	1,565	95	3.00	23,475.00	118,475.00	233,300.00
07/01/27	1,470	95	3.00	22,050.00	117,050.00	
01/01/28	1,375	95	3.00	20,625.00	115,625.00	232,675.00
07/01/28	1,280	100	3.00	19,200.00	119,200.00	
01/01/29	1,180	100	3.00	17,700.00	117,700.00	236,900.00
07/01/29	1,080	100	3.00	16,200.00	116,200.00	
01/01/30	980	100	3.00	14,700.00	114,700.00	230,900.00
07/01/30	880	105	3.00	13,200.00	118,200.00	
01/01/31	775	105	3.00	11,625.00	116,625.00	234,825.00
07/01/31	670	105	3.00	10,050.00	115,050.00	
01/01/32	565	110	3.00	8,475.00	118,475.00	233,525.00
07/01/32	455	110	3.00	6,825.00	116,825.00	
01/01/33	345	110	3.00	5,175.00	115,175.00	232,000.00
07/01/33	235	115	3.00	3,525.00	118,525.00	
01/01/34	120	120	3.00	1,800.00	121,800.00	240,325.00
		$2,955		$788,850.00	$3,743,850.00	$3,743,850.00

ANYTOWN WATER UTILITY/SEWAGE WORKS

SCHEDULE OF ESTIMATED PROJECT COSTS AND FUNDING

	Years	
ESTIMATED PROJECT COSTS	2022	2026
Estimated Construction Costs and Contingencies:		
Project __	$855,000	
Project __		$1,850,000
Total Estimated Construction Costs	855,000	1,850,000
Estimated Non-Construction Costs:		
Engineering	170,000	350,000
Grant administration (if grant funding is anticipated)		
Underwriter's discount (for open market bonds)		
Legal, bond counsel, financial advisory and contingencies	90,000	90,000
Total Estimated Non-Construction Costs	260,000	440,000
Total Estimated Project Costs	$1,115,000	$2,290,000
ESTIMATED PROJECT FUNDING		
Proposed [Sewage Works/Waterworks] revenue bonds	$1,115,000	$2,290,000
Grant funding		
Cash on hand		
Total Estimated Project Funding	$1,115,000	$2,290,000

Note: Include in this schedule the bond funding requirements from the Utility Capital Improvement Plan schedules.

ANYTOWN WATER UTILITY/SEWAGE WORKS

SCHEDULE OF AMORTIZATION OF $1,115,000 PRINCIPAL AMOUNT
OF PROPOSED [SEWAGE WORKS/WATERWORKS] REVENUE BONDS OF 2022
Assumes bonds are issued July 1, 2022.

Payment Date	Principal Balance	Principal	Assumed Interest Rate*	Debt Service		Bond Year Total
	(------In $1,000's------)		(%)	Interest	Total	
				(----------In Dollars----------)		
01/01/23	$1,115			$22,300.00	$22,300.00	$22,300.00
07/01/23	1,115	$20	4.00	22,300.00	42,300.00	
01/01/24	1,095	20	4.00	21,900.00	41,900.00	84,200.00
07/01/24	1,075	20	4.00	21,500.00	41,500.00	
01/01/25	1,055	20	4.00	21,100.00	41,100.00	82,600.00
07/01/25	1,035	20	4.00	20,700.00	40,700.00	
01/01/26	1,015	20	4.00	20,300.00	40,300.00	81,000.00
07/01/26	995	20	4.00	19,900.00	39,900.00	
01/01/27	975	20	4.00	19,500.00	39,500.00	79,400.00
07/01/27	955	20	4.00	19,100.00	39,100.00	
01/01/28	935	20	4.00	18,700.00	38,700.00	77,800.00
07/01/28	915	20	4.00	18,300.00	38,300.00	
01/01/29	895	25	4.00	17,900.00	42,900.00	81,200.00
07/01/29	870	25	4.00	17,400.00	42,400.00	
01/01/30	845	25	4.00	16,900.00	41,900.00	84,300.00
07/01/30	820	25	4.00	16,400.00	41,400.00	
01/01/31	795	25	4.00	15,900.00	40,900.00	82,300.00
07/01/31	770	25	4.00	15,400.00	40,400.00	
01/01/32	745	25	4.00	14,900.00	39,900.00	80,300.00
07/01/32	720	25	4.00	14,400.00	39,400.00	
01/01/33	695	25	4.00	13,900.00	38,900.00	78,300.00
07/01/33	670	25	4.00	13,400.00	38,400.00	
01/01/34	645	30	4.00	12,900.00	42,900.00	81,300.00
07/01/34	615	30	4.00	12,300.00	42,300.00	
01/01/35	585	30	4.00	11,700.00	41,700.00	84,000.00
07/01/35	555	30	4.00	11,100.00	41,100.00	
01/01/36	525	30	4.00	10,500.00	40,500.00	81,600.00
07/01/36	495	30	4.00	9,900.00	39,900.00	
01/01/37	465	30	4.00	9,300.00	39,300.00	79,200.00
07/01/37	435	30	4.00	8,700.00	38,700.00	
01/01/38	405	35	4.00	8,100.00	43,100.00	81,800.00
07/01/38	370	35	4.00	7,400.00	42,400.00	
01/01/39	335	35	4.00	6,700.00	41,700.00	84,100.00
07/01/39	300	35	4.00	6,000.00	41,000.00	
01/01/40	265	35	4.00	5,300.00	40,300.00	81,300.00
07/01/40	230	35	4.00	4,600.00	39,600.00	
01/01/41	195	35	4.00	3,900.00	38,900.00	78,500.00
07/01/41	160	40	4.00	3,200.00	43,200.00	
01/01/42	120	40	4.00	2,400.00	42,400.00	85,600.00
07/01/42	80	40	4.00	1,600.00	41,600.00	
01/01/43	40	40	4.00	800.00	40,800.00	82,400.00
		$1,115		$538,500.00	$1,653,500.00	$1,653,500.00

*Assumes a 4% SRF interest rate.

ANYTOWN WATER UTILITY/SEWAGE WORKS

SCHEDULE OF AMORTIZATION OF $2,290,000 PRINCIPAL AMOUNT
OF PROPOSED [SEWAGE WORKS/WATERWORKS] REVENUE BONDS OF 2026
Assumes bonds are issued July 1, 2026.

Payment Date	Principal Balance	Principal	Assumed Interest Rate*	Debt Service		Bond Year Total
	(------In $1,000's------)		(%)	Interest	Total	
				(----------In Dollars----------)		
01/01/27	$2,290			$57,250.00	$57,250.00	$57,250.00
07/01/27	2,290	$35	5.00	57,250.00	92,250.00	
01/01/28	2,255	35	5.00	56,375.00	91,375.00	183,625.00
07/01/28	2,220	35	5.00	55,500.00	90,500.00	
01/01/29	2,185	35	5.00	54,625.00	89,625.00	180,125.00
07/01/29	2,150	35	5.00	53,750.00	88,750.00	
01/01/30	2,115	40	5.00	52,875.00	92,875.00	181,625.00
07/01/30	2,075	40	5.00	51,875.00	91,875.00	
01/01/31	2,035	40	5.00	50,875.00	90,875.00	182,750.00
07/01/31	1,995	40	5.00	49,875.00	89,875.00	
01/01/32	1,955	40	5.00	48,875.00	88,875.00	178,750.00
07/01/32	1,915	45	5.00	47,875.00	92,875.00	
01/01/33	1,870	45	5.00	46,750.00	91,750.00	184,625.00
07/01/33	1,825	45	5.00	45,625.00	90,625.00	
01/01/34	1,780	45	5.00	44,500.00	89,500.00	180,125.00
07/01/34	1,735	50	5.00	43,375.00	93,375.00	
01/01/35	1,685	50	5.00	42,125.00	92,125.00	185,500.00
07/01/35	1,635	50	5.00	40,875.00	90,875.00	
01/01/36	1,585	50	5.00	39,625.00	89,625.00	180,500.00
07/01/36	1,535	55	5.00	38,375.00	93,375.00	
01/01/37	1,480	55	5.00	37,000.00	92,000.00	185,375.00
07/01/37	1,425	55	5.00	35,625.00	90,625.00	
01/01/38	1,370	55	5.00	34,250.00	89,250.00	179,875.00
07/01/38	1,315	60	5.00	32,875.00	92,875.00	
01/01/39	1,255	60	5.00	31,375.00	91,375.00	184,250.00
07/01/39	1,195	60	5.00	29,875.00	89,875.00	
01/01/40	1,135	65	5.00	28,375.00	93,375.00	183,250.00
07/01/40	1,070	65	5.00	26,750.00	91,750.00	
01/01/41	1,005	65	5.00	25,125.00	90,125.00	181,875.00
07/01/41	940	70	5.00	23,500.00	93,500.00	
01/01/42	870	70	5.00	21,750.00	91,750.00	185,250.00
07/01/42	800	70	5.00	20,000.00	90,000.00	
01/01/43	730	75	5.00	18,250.00	93,250.00	183,250.00
07/01/43	655	75	5.00	16,375.00	91,375.00	
01/01/44	580	75	5.00	14,500.00	89,500.00	180,875.00
07/01/44	505	80	5.00	12,625.00	92,625.00	
01/01/45	425	80	5.00	10,625.00	90,625.00	183,250.00
07/01/45	345	85	5.00	8,625.00	93,625.00	
01/01/46	260	85	5.00	6,500.00	91,500.00	185,125.00
07/01/46	175	85	5.00	4,375.00	89,375.00	
01/01/47	90	90	5.00	2,250.00	92,250.00	181,625.00
		$2,290		$1,418,875.00	$3,708,875.00	$3,708,875.00

*Assumes a 5% SRF interest rate.

ANYTOWN WATER UTILITY/SEWAGE WORKS

SCHEDULE OF PROPOSED COMBINED BOND AMORTIZATION

Bond Year Ending	Outstanding Bonds	Proposed Bonds 1	Proposed Bonds 2	Total	Bond Year Total
07/01/18	$114,325.00			$114,325.00	
01/01/19	118,275.00			118,275.00	$232,600.00
07/01/19	117,150.00			117,150.00	
01/01/20	116,025.00			116,025.00	233,175.00
07/01/20	114,900.00			114,900.00	
01/01/21	118,775.00			118,775.00	233,675.00
07/01/21	117,575.00			117,575.00	
01/01/22	116,375.00			116,375.00	233,950.00
07/01/22	115,175.00			115,175.00	
01/01/23	118,975.00	$22,300.00		141,275.00	256,450.00
07/01/23	117,700.00	42,300.00		160,000.00	
01/01/24	116,425.00	41,900.00		158,325.00	318,325.00
07/01/24	115,150.00	41,500.00		156,650.00	
01/01/25	118,875.00	41,100.00		159,975.00	316,625.00
07/01/25	117,525.00	40,700.00		158,225.00	
01/01/26	116,175.00	40,300.00		156,475.00	314,700.00
07/01/26	114,825.00	39,900.00		154,725.00	
01/01/27	118,475.00	39,500.00	$57,250.00	215,225.00	369,950.00
07/01/27	117,050.00	39,100.00	92,250.00	248,400.00	
01/01/28	115,625.00	38,700.00	91,375.00	245,700.00	494,100.00
07/01/28	119,200.00	38,300.00	90,500.00	248,000.00	
01/01/29	117,700.00	42,900.00	89,625.00	250,225.00	498,225.00
07/01/29	116,200.00	42,400.00	88,750.00	247,350.00	
01/01/30	114,700.00	41,900.00	92,875.00	249,475.00	496,825.00
07/01/30	118,200.00	41,400.00	91,875.00	251,475.00	
01/01/31	116,625.00	40,900.00	90,875.00	248,400.00	499,875.00
07/01/31	115,050.00	40,400.00	89,875.00	245,325.00	
01/01/32	118,475.00	39,900.00	88,875.00	247,250.00	492,575.00
07/01/32	116,825.00	39,400.00	92,875.00	249,100.00	
01/01/33	115,175.00	38,900.00	91,750.00	245,825.00	494,925.00
07/01/33	118,525.00	38,400.00	90,625.00	247,550.00	
01/01/34	121,800.00	42,900.00	89,500.00	254,200.00	501,750.00
07/01/34		42,300.00	93,375.00	135,675.00	
01/01/35		41,700.00	92,125.00	133,825.00	269,500.00
07/01/35		41,100.00	90,875.00	131,975.00	
01/01/36		40,500.00	89,625.00	130,125.00	262,100.00
07/01/36		39,900.00	93,375.00	133,275.00	
01/01/37		39,300.00	92,000.00	131,300.00	264,575.00
07/01/37		38,700.00	90,625.00	129,325.00	
01/01/38		43,100.00	89,250.00	132,350.00	261,675.00
07/01/38		42,400.00	92,875.00	135,275.00	
01/01/39		41,700.00	91,375.00	133,075.00	268,350.00
07/01/39		41,000.00	89,875.00	130,875.00	
01/01/40		40,300.00	93,375.00	133,675.00	264,550.00
07/01/40		39,600.00	91,750.00	131,350.00	
01/01/41		38,900.00	90,125.00	129,025.00	260,375.00
07/01/41		43,200.00	93,500.00	136,700.00	
01/01/42		42,400.00	91,750.00	134,150.00	270,850.00
07/01/42		41,600.00	90,000.00	131,600.00	
01/01/43		40,800.00	93,250.00	134,050.00	265,650.00
07/01/43			91,375.00	91,375.00	
01/01/44			89,500.00	89,500.00	180,875.00
07/01/44			92,625.00	92,625.00	
01/01/45			90,625.00	90,625.00	183,250.00
07/01/45			93,625.00	93,625.00	
01/01/46			91,500.00	91,500.00	185,125.00
07/01/46			89,375.00	89,375.00	
01/01/47			92,250.00	92,250.00	181,625.00
Totals:	$3,743,850.00	$1,653,500.00	$3,708,875.00	$9,106,225.00	$9,106,225.00

ANYTOWN WATER UTILITY/SEWAGE WORKS

ESTIMATED ANNUAL CASH OPERATING EXPENSES

	Test Year	Adjustment	Ref.	Estimated 2018
Annual Operating Expenses:				
Salaries and wages	$350,000	$35,000	(1)	$385,000
Employee pensions and benefits	125,000	12,500	(2)	137,500
Purchased water/treatment	100,000			100,000
Materials and supplies	15,000	500	(3)	15,500
Chemicals	95,000	2,900	(3)	97,900
Repairs and maintenance	50,000	25,000	(4)	75,000
[Sludge removal]				
Contractual services	50,000	1,500	(3)	51,500
Utilities	75,000	2,300	(3)	77,300
Transportation	23,000	700	(3)	23,700
Insurance	60,000	2,000	(4)	62,000
Miscellaneous	7,000	200	(3)	7,200
Totals	$950,000	$82,600		$1,032,600

References

(1) Assumes the salaries and wages are adjusted per the adopted salary ordinance and the addition of one new employee.
(2) Benefits are based on current premiums and the addition of one new employee.
(3) Assumes a 3% inflationary increase.
(4) The repairs and maintenance and insurance expenses are adjusted to the budgeted amount and to provide an allowance for tank maintenance.

ANYTOWN WATER UTILITY/SEWAGE WORKS

**SCHEDULE OF ESTIMATED REVENUES, EXPENSES,
ENDING CASH AND RESULTING AVERAGE MONTHLY BILL**

	Estimated Year									
	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
Operating Revenues:										
Metered sales/Collections (1)										
Residential	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000
Commercial	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000
Industrial	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000
Governmental	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000
Fire protection (1)	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000
Additional revenues from rate increases (2)		57,300	115,300	175,800	238,900	312,000	388,600	468,800	569,600	693,900
Capacity fees (3)	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
Other revenues (4)	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000
Total Operating Revenues	1,355,000	1,412,300	1,470,300	1,530,800	1,593,900	1,667,000	1,743,600	1,823,800	1,924,600	2,048,900
Operation and Maintenance Expenses (5)	1,032,600	1,063,600	1,095,500	1,128,400	1,162,300	1,197,200	1,233,100	1,270,100	1,308,200	1,347,400
Net Operating Revenues	322,400	348,700	374,800	402,400	431,600	469,800	510,500	553,700	616,400	701,500
Non-Operating Revenues										
Interest income (4)	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
Misc. Revenues (4)	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500
Total Non-Operating Revenues	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500
Non-Operating Expenditures:										
Outstanding and proposed debt service (6)	232,600	233,200	233,700	234,000	256,500	318,300	316,600	314,700	370,000	494,100
Debt service reserve funding (7)					8,600	17,100	17,100	17,100	35,700	45,700
Payment in lieu of taxes (4)	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000
Capital improvements - cash funded (8)	92,500	67,500	117,500	167,500	117,500	117,500	117,500	67,500	67,500	92,500
Total Non-Operating Expenditures	350,100	325,700	376,200	426,500	407,600	477,900	476,200	424,300	498,200	657,300
Increase (Decrease) in Cash and Cash Equivalents	(25,200)	25,500	1,100	(21,600)	26,500	(5,600)	36,800	131,900	120,700	46,700
Beginning Cash and Cash Equivalents	750,000	724,800	750,300	751,400	729,800	756,300	750,700	787,500	919,400	1,040,100
Ending Cash and Cash Equivalents	$724,800	$750,300	$751,400	$729,800	$756,300	$750,700	$787,500	$919,400	$1,040,100	$1,086,800
Estimated increase in rates	0.00%	4.50%	4.50%	4.50%	4.50%	5.00%	5.00%	5.00%	6.00%	7.00%
Monthly bill (currently $35.00 per month assuming residential usage of 4,000)	$35.00	$36.60	$38.25	$40.00	$41.80	$43.90	$46.10	$48.45	$51.40	$55.00
Dollar Increase	$0.00	$1.60	$1.65	$1.75	$1.80	$2.10	$2.20	$2.35	$2.95	$3.60
Debt Service Coverage	139%	150%	161%	172%	169%	148%	162%	176%	167%	142%
Debt Service Coverage (All-In)	127%	138%	149%	160%	158%	139%	153%	167%	159%	136%

(Continued on next page)

ANYTOWN WATER UTILITY/SEWAGE WORKS

(Cont'd)

**SCHEDULE OF ESTIMATED REVENUES, EXPENSES,
ENDING CASH AND RESULTING AVERAGE MONTHLY BILL**

	Estimated Year									
	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Operating Revenues:										
Metered sales/Collections (1)										
Residential	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000	$900,000
Commercial	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000
Industrial	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000
Governmental	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000
Fire protection (1)	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000	150,000
Additional revenues from rate increases (2)	769,700	848,300	848,300	848,300	889,100	951,500	951,500	951,500	951,500	951,500
Capacity fees (3)	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
Other revenues (4)	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000
Total Operating Revenues	2,124,700	2,203,300	2,203,300	2,203,300	2,244,100	2,306,500	2,306,500	2,306,500	2,306,500	2,306,500
Operation and Maintenance Expenses (5)	1,387,800	1,429,400	1,472,300	1,516,500	1,562,000	1,608,900	1,657,200	1,706,900	1,758,100	1,810,800
Net Operating Revenues	736,900	773,900	731,000	686,800	682,100	697,600	649,300	599,600	548,400	495,700
Non-Operating Revenues										
Interest income (4)	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
Misc. Revenues (4)	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500
Total Non-Operating Revenues	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500	2,500
Non-Operating Expenditures:										
Outstanding and proposed debt service (6)	498,200	496,800	499,900	492,600	494,900	501,800	269,500	262,100	264,600	261,700
Debt service reserve funding (7)	37,100	37,100	37,100	18,600						
Payment in lieu of taxes (4)	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000
Capital improvements - cash funded (8)	92,500	117,500	117,500	167,500	167,500	67,500	217,500	167,500	167,500	517,500
Total Non-Operating Expenditures	652,800	676,400	679,500	703,700	687,400	594,300	512,000	454,600	457,100	804,200
Increase (Decrease) in Cash and Cash Equivalents	86,600	100,000	54,000	(14,400)	(2,800)	105,800	139,800	147,500	93,800	(306,000)
Beginning Cash and Cash Equivalents	1,086,800	1,173,400	1,273,400	1,327,400	1,313,000	1,310,200	1,416,000	1,555,800	1,703,300	1,797,100
Ending Cash and Cash Equivalents	$1,173,400	$1,273,400	$1,327,400	$1,313,000	$1,310,200	$1,416,000	$1,555,800	$1,703,300	$1,797,100	$1,491,100
Estimated increase in rates	4.00%	4.00%	0.00%	0.00%	2.00%	3.00%	0.00%	0.00%	0.00%	0.00%
Monthly bill (currently $35.00 per month assuming residential usage of 4,000)	$57.20	$59.50	$59.50	$59.50	$60.70	$62.55	$62.55	$62.55	$62.55	$62.55
Dollar Increase	$2.20	$2.30	$0.00	$0.00	$1.20	$1.85	$0.00	$0.00	$0.00	$0.00
Debt Service Coverage	148%	156%	146%	140%	138%	139%	241%	229%	208%	190%
Debt Service Coverage (All-In)	142%	150%	141%	134%	132%	134%	231%	218%	197%	179%

ANYTOWN WATER UTILITY/SEWAGE WORKS

SCHEDULE OF ESTIMATED REVENUES, EXPENSES,
ENDING CASH AND RESULTING AVERAGE MONTHLY BILL
(Explanation of References)

(1) Assumed at calendar year 2017 amounts. The future revenue estimates assume no significant customer growth.

(2) The collection rate has historically been 98% for the last 5 years. We have assumed a 95% collection rate for future years as an allowance for conservation and rate fatigue.

(3) Assumes two new connections per year.

(4) Assumed at calendar year 2017 amounts.

(5) See page 8 for the 2018 estimated amount. Future years assume 3% annual inflationary increases.

(6) See the combined amortization schedule on page 7.

(7) Assumes the debt service reserve account equal to the maximum annual principal and interest payment is funded from revenues over a 5 year period.

(8) See the Utility Capital Improvement Plan on pages 1 and 2.

For Cash Basis Financial Statements

ANYTOWN WATER UTILITY/SEWAGE WORKS

COMPARATIVE SCHEDULE OF SELECTED FINANCIAL INFORMATION ARISING FROM CASH TRANSACTIONS

	Calendar Year Ended *		
Cash and Cash Equivalents:	20__	20__	20__
Operating fund			
Sinking fund:			
Bond and interest			
Debt service reserve			
Depreciation/improvement fund			
Meter deposit fund			
Construction fund			
Total Cash and Cash Equivalents	-	-	-
Investments:			
Operating			
Sinking fund:			
Bond and interest			
Debt service reserve			
Depreciation/improvement fund			
Construction			
Total Investments	-	-	-
Total Cash and Investments	$0	$0	$0
Bonded Indebtedness:			
_____			

* Historical financial statements.

For Cash Basis Financial Statements

ANYTOWN WATER UTILITY/SEWAGE WORKS

COMPARATIVE SCHEDULE OF CASH RECEIPTS AND DISBURSEMENTS

	Calendar Year Ended		
	20__	20__	20__
Operating Receipts:			
Metered sales/collections			
Residential			
Commercial			
Industrial			
Governmental			
Penalties/forfeited discounts			
Fire protection			
Capacity fees			
Excessive strength surcharges			
Other			
Total Operating Receipts	-	-	-
Operating Disbursements:			
Salaries and wages			
Employee pensions and benefits			
Purchased water/treatment			
Materials and supplies			
Chemicals			
Repairs and maintenance			
Sludge removal			
Contractual services			
Utilities			
Transportation			
Insurance			
Miscellaneous			
Total Operating Disbursements	-	-	-
Net Operating Receipts	-	-	-
Non-Operating Receipts:			
Tap fees			
Interest			
Meter deposits (net)			
Miscellaneous receipts			
Total Non-Operating Receipts:	-	-	-
Non-Operating Disbursements:			
Debt service			
Capital improvements			
Payment in lieu of taxes			
Total Non-Operating Disbursements:	-	-	-
Increase (decrease) in cash and cash equivalents	-	-	-
Beginning cash and cash equivalents	-	-	-
Ending Cash and Cash Equivalents	$0	$0	$0

For Accrual Financial Statements - Insert in next few worksheets.

ANYTOWN WATER UTILITY/SEWAGE WORKS

Performance Measures *(continued)*

Bad Debt Expense as a Percent of Revenues

Bad Debt Expense	
Total Operating Revenues	59,510
Bad Debt Expense as a Percent of Revenues	

Sewer Overflow Rate Per Feet of Pipe

Enter Total Number of Sewer Overflows for Year	0
Total Feet of Pipe in Sewage Collection System	
Sewer Overflow Rate Per Feet of Pipe	

Wastewater Treatment Compliance Rate

Enter Annual Number of Standard Noncompliance Days reported on Monthly Operating Report	
Wastewater Treatment Compliance Rate	
Enter Number of Discharge/Operating Permits Issued to Utility	1

System Renewal/Replacement Rate (%)

Enter Actual Investment in Assets Replacement + Funds Reserved for Replacement	$ -
Total Gross Utility Plant in Service	$ 236,791
System Renewal/Replacement Rate (%)	

Training Hours Per Full-time ("FT") Employee Equivalent

Enter Total of Qualified Formal Training Hours for FT Employee Equivalents	5.00
Total number of Full-time Employee Equivalents	1.00
Training Hours Per Employee	5.00

Training Hours Per FT Contract Employee Equivalent

Enter Total of Qualified Formal Training Hours for Contract Employee Equivalents	-
Total number of Full-time Contract Employee Equivalents	1.00
Training Hours Per Contract Employee	

Planned Maintenance Ratio

Planned maintenance is performed based on a predetermined schedule. Corrective maintenance is in response to failure or from an asset no longer providing reliable service.

Enter Planned Maintenance (hours)	260
Enter Corrective Maintenance (hours)	260
Planned Maintenance Ratio (hours)	50.00%
Enter Planned Maintenance (costs)	$ 2,500
Enter Corrective Maintenance (costs)	$ 5,000
Planned Maintenance Ratio (costs)	33.33%

Density of Wastewater Connections

Enter Feet of Collection System Pipe	14,784.0
Feet of Main per Customer Served	75.4

Enter percentage of wastewater treated with utility owned plant	100%
Enter percentage of wastewater treated by another utility plant	0%

Maintenance Summary		Total Inventory	Percent of Total
Enter Linear feet of lines cleaned	1,500	14,784	10.15%
Enter Linear feet of lines televised	-	14,784	
Enter Number of Manhole Inspections Conducted	5		
Enter Total Number of Manholes in System		55	9.09%

How many Sanitary Sewer Overflows were reported to IDEM this year? 0

Sewer Overflow Rate Per Feet of Pipe

Wastewater Treatment Compliance Rate

Enter Annual Number of Standard Noncompliance Days reported on Monthly Operating Report

Wastewater Treatment Compliance Rate

Enter Number of Discharge/Operating Permits Issued to Utility → 1

System Renewal/Replacement Rate (%)

Enter Actual Investment in Assets Replacement + Funds Reserved for Replacement → $ -

Total Gross Utility Plant in Service $ 249,287

System Renewal/Replacement Rate (%)

Training Hours Per Full-time ("FT") Employee Equivalent

Enter Total of Qualified Formal Training Hours for FT Employee Equivalents → 5.00

Total number of Full-time Employee Equivalents 1.00

Training Hours Per Employee 5.00

Training Hours Per FT Contract Employee Equivalent

Enter Total of Qualified Formal Training Hours for Contract Employee Equivalents → -

Total number of Full-time Contract Employee Equivalents 1.00

Training Hours Per Contract Employee

Planned Maintenance Ratio

Planned maintenance is performed based on a predetermined schedule. Corrective maintenance is in response to failure or from an asset no longer providing reliable service.

Enter Planned Maintenance (hours) → 260

Enter Corrective Maintenance (hours) → 260

Planned Maintenance Ratio (hours) 50.00%

Enter Planned Maintenance (costs) → $ 2,500

Enter Corrective Maintenance (costs) → $ 2,500

Planned Maintenance Ratio (costs) 50.00%

Density of Wastewater Connections

Enter Feet of Collection System Pipe → 14,784.0

Feet of Main per Customer Served 74.3

Enter percentage of wastewater treated with utility owned plant → 100%

Enter percentage of wastewater treated by another utility plant → 0%

Maintenance Summary		Total Inventory	Percent of Total
Enter Linear feet of lines cleaned →	1,500	14,784	10.15%
Enter Linear feet of lines televised →	-	14,784	
Enter Number of Manhole Inspections Conducted	5		
Enter Total Number of Manholes in System →		55	9.09%

How many Sanitary Sewer Overflows were reported to IDEM this year? 0

Performance Measures *(continued)*

Bad Debt Expense as a Percent of Revenues

Bad Debt Expense	
Total Operating Revenues	77,914
Bad Debt Expense as a Percent of Revenues	

Sewer Overflow Rate Per Feet of Pipe

Enter Total Number of Sewer Overflows for Year	0
Total Feet of Pipe in Sewage Collection System	
Sewer Overflow Rate Per Feet of Pipe	

Wastewater Treatment Compliance Rate

Enter Annual Number of Standard Noncompliance Days reported on Monthly Operating Report	
Wastewater Treatment Compliance Rate	
Enter Number of Discharge/Operating Permits Issued to Utility	1

System Renewal/Replacement Rate (%)

Enter Actual Investment in Assets Replacement + Funds Reserved for Replacement	$ -
Total Gross Utility Plant in Service	$ 249,287
System Renewal/Replacement Rate (%)	

Training Hours Per Full-time ("FT") Employee Equivalent

Enter Total of Qualified Formal Training Hours for FT Employee Equivalents	5.00
Total number of Full-time Employee Equivalents	1.00
Training Hours Per Employee	5.00

Training Hours Per FT Contract Employee Equivalent

Enter Total of Qualified Formal Training Hours for Contract Employee Equivalents	-
Total number of Full-time Contract Employee Equivalents	1.00
Training Hours Per Contract Employee	

Planned Maintenance Ratio

Planned maintenance is performed based on a predetermined schedule. Corrective maintenance is in response to failure or from an asset no longer providing reliable service.

Enter Planned Maintenance (hours)	260
Enter Corrective Maintenance (hours)	260
Planned Maintenance Ratio (hours)	50.00%
Enter Planned Maintenance (costs)	$ 2,500
Enter Corrective Maintenance (costs)	$ 2,500
Planned Maintenance Ratio (costs)	50.00%

Density of Wastewater Connections

Enter Feet of Collection System Pipe	14,784.0
Feet of Main per Customer Served	73.6

Enter percentage of wastewater treated with utility owned plant	100%
Enter percentage of wastewater treated by another utility plant	0%

Maintenance Summary		Total Inventory	Percent of Total
Enter Linear feet of lines cleaned	1,500	14,784	10.15%
Enter Linear feet of lines televised	-	14,784	
Enter Number of Manhole Inspections Conducted	5		
Enter Total Number of Manholes in System		55	9.09%

How many Sanitary Sewer Overflows were reported to IDEM this year? 0

Performance Measures *(continued)*

Bad Debt Expense as a Percent of Revenues	
Bad Debt Expense	$ -
Total Operating Revenues	81,327
Bad Debt Expense as a Percent of Revenues	0.00%
Sewer Overflow Rate Per Feet of Pipe	
Enter Total Number of Sewer Overflows for Year →	1
Total Feet of Pipe in Sewage Collection System	-
Sewer Overflow Rate Per Feet of Pipe	-
Wastewater Treatment Compliance Rate	
Enter Annual Number of Standard Noncompliance Days reported on Monthly Operating Report	
Wastewater Treatment Compliance Rate	100.00%
Enter Number of Discharge/Operating Permits Issued to Utility →	1
System Renewal/Replacement Rate (%)	
Enter Actual Investment in Assets Replacement + Funds Reserved for Replacement →	$ -
Total Gross Utility Plant in Service	$ 249,287
System Renewal/Replacement Rate (%)	0.00%
Training Hours Per Full-time ("FT") Employee Equivalent	
Enter Total of Qualified Formal Training Hours for FT Employee Equivalents →	5.00
Total number of Full-time Employee Equivalents	1.00
Training Hours Per Employee	5.00
Training Hours Per FT Contract Employee Equivalent	
Enter Total of Qualified Formal Training Hours for Contract Employee Equivalents →	-
Total number of Full-time Contract Employee Equivalents	1.00
Training Hours Per Contract Employee	-
Planned Maintenance Ratio	

Planned maintenance is performed based on a predetermined schedule. Corrective maintenance is in response to failure or from an asset no longer providing reliable service.

Enter Planned Maintenance (hours) →	260
Enter Corrective Maintenance (hours) →	260
Planned Maintenance Ratio (hours)	50.00%
Enter Planned Maintenance (costs) →	$ 2,500
Enter Corrective Maintenance (costs) →	$ 2,500
Planned Maintenance Ratio (costs)	50.00%
Density of Wastewater Connections	
Enter Feet of Collection System Pipe →	14,784.0
Feet of Main per Customer Served	72.8

Enter percentage of wastewater treated with utility owned plant →	100%
Enter percentage of wastewater treated by another utility plant →	0%

Maintenance Summary		Total Inventory	Percent of Total
Enter Linear feet of lines cleaned →	1,500	14,784	10.15%
Enter Linear feet of lines televised →	-	14,784	0.00%
Enter Number of Manhole Inspections Conducted	5		
Enter Total Number of Manholes in System →		55	9.09%

How many Sanitary Sewer Overflows were reported to IDEM this year? 1

CONNERSVILLE UTILITIES
Water • Sewer • Storm Water
216 Vine Street • P.O. Box 325
Connersville, IN 47331

INVOICE

Account # 60.0036.1
Date 2/6/2023
Total $210.00

TO AVOID LATE PENALTIES, ALLOW POSTAL DELIVERY TIME BEFORE THE DUE DATE WHEN MAILING YOUR PAYMENT

Bill to:
Pleasantview Utilities
c/o Matt Sherck
3812 W Galaxy Dr
Connersville, IN 47331

Sewer - Parts
CSSALE
D142.00
C415.00

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT. MAKE CHECK PAYABLE TO: CONNERSVILLE UTILITIES

KEEP THIS PORTION FOR YOUR RECORDS.

Item #	Description	Qty	Price	Extended Amount
11/7/2022	Rodded 300 ft of sewer on 11/07/2022- manhours	2	$ 30.00	$ 60.00
	for Pleasantview Utilities	0	$ -	$ -
	use of vac truck / equipment hours	1	$ 150.00	$ 150.00

Subtotal	
Manhours	$60.00
Equipment Hrs.	$150.00
Miscellaneous	$0.00
Due 02/24/2023	**$210.00**

HOURS
MONDAY - FRIDAY
8:30 A.M. - 4:30 P.M.

DRIVE UP SERVICE AVAILABLE

MAKE CHECKS PAYABLE TO:
CONNERSVILLE UTILITIES
MAIL TO : P.O. BOX 325
CONNERSVILLE, IN 47331

A NIGHT DEPOSITORY IS LOCATED NEXT TO DRIVE UP WINDOW

BUSINESS TELEPHONE (765) 825-2158
EMERGENCY TELEPHONE (765) 825-9411
FAX TELEPHONE (765) 825-5031
EMAIL - office@connersvilleutilities.com

CONNERSVILLE UTILITIES

Quality On Tap!
Our Commitment Our Profession

CONNERSVILLE UTILITIES
Water • Sewer • Storm Water
216 Vine Street • P.O. Box 325
Connersville, IN 47331

INVOICE

Account # 60.0036.1
Date 6/8/2023
Total $210.00

TO AVOID LATE PENALTIES, ALLOW POSTAL DELIVERY TIME BEFORE THE DUE DATE WHEN MAILING YOUR PAYMENT

Bill to:
Pleasantview Utilities
c/o Matt Sherck
3812 W Galaxy Dr
Connersville, IN 47331

Sewer - Parts
CSSALE
D142.00
C415.00

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT. MAKE CHECK PAYABLE TO: CONNERSVILLE UTILITIES

KEEP THIS PORTION FOR YOUR RECORDS.

Item #	Description	Qty	Price	Extended Amount
2/14/2023	Rodded 380 ft of sewer on 2/14/23- manhours	2	$ 30.00	$ 60.00
	for Pleasantview Utilities (Galaxy & Starlight Dr)	0	$ -	$ -
	use of vac truck / equipment hours	1	$ 150.00	$ 150.00

Subtotal	
Manhours	$60.00
Equipment Hrs.	$150.00
Miscellaneous	$0.00
Due 06/23/2023	**$210.00**

HOURS
MONDAY - FRIDAY
8:30 A.M. - 4:30 P.M.

MAKE CHECKS PAYABLE TO:
CONNERSVILLE UTILITIES
MAIL TO : P.O. BOX 325
CONNERSVILLE, IN 47331

BUSINESS TELEPHONE (765) 825-2158
EMERGENCY TELEPHONE (765) 825-9411
FAX TELEPHONE (765) 825-5031
EMAIL - office@connersvilleutilities.com

DRIVE UP SERVICE AVAILABLE

A NIGHT DEPOSITORY IS LOCATED NEXT TO DRIVE UP WINDOW

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Water • Sewer • Storm Water
216 Vine Street • P.O. Box 325
Connersville, IN 47331

INVOICE

Account # 60.0036.1
Date 6/8/2023
Total $600.00

TO AVOID LATE PENALTIES, ALLOW POSTAL DELIVERY TIME BEFORE THE DUE DATE WHEN MAILING YOUR PAYMENT

Bill to:
Pleasantview Utilities
c/o Matt Sherck
3812 W Galaxy Dr
Connersville, IN 47331

Sewer - Parts
CSSALE
D142.00
C415.00

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT. MAKE CHECK PAYABLE TO: CONNERSVILLE UTILITIES

KEEP THIS PORTION FOR YOUR RECORDS.

Item #	Description	Qty	Price	Extended Amount
3/4/2023	Rodded sewer mains on 3/4/23- manhours	5	$ 45.00	$ 225.00
	for Pleasantview Utilities	0	$ -	$ -
	use of vac truck / equipment hours	2.5	$ 150.00	$ 375.00

Subtotal	
Manhours	$225.00
Equipment Hrs.	$375.00
Miscellaneous	$0.00
Due 06/23/2023	**$600.00**

HOURS
MONDAY - FRIDAY
8:30 A.M. - 4:30 P.M.

DRIVE UP SERVICE AVAILABLE

MAKE CHECKS PAYABLE TO:
CONNERSVILLE UTILITIES
MAIL TO : P.O. BOX 325
CONNERSVILLE, IN 47331

A NIGHT DEPOSITORY IS LOCATED NEXT TO DRIVE UP WINDOW

BUSINESS TELEPHONE (765) 825-2158
EMERGENCY TELEPHONE (765) 825-9411
FAX TELEPHONE (765) 825-5031
EMAIL - office@connersvilleutilities.com

CONNERSVILLE UTILITIES

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CONNERSVILLE UTILITIES
Water • Sewer • Storm Water
216 Vine Street • P.O. Box 325
Connersville, IN 47331

INVOICE

Account # 60.0036.1
Date 6/8/2023
Total $360.00

TO AVOID LATE PENALTIES, ALLOW POSTAL DELIVERY TIME BEFORE THE DUE DATE WHEN MAILING YOUR PAYMENT

Bill to:
Pleasantview Utilities
c/o Matt Sherck
3812 W Galaxy Dr
Connersville, IN 47331

Sewer - Parts
CSSALE
D142.00
C415.00

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT. MAKE CHECK PAYABLE TO: CONNERSVILLE UTILITIES

KEEP THIS PORTION FOR YOUR RECORDS.

Item #	Description	Qty	Price	Extended Amount
3/25/2023	Rodded 300 ft of sewer on 3/25/23-manhours	3	$ 45.00	$ 135.00
	for Pleasantview Utilities	0	$ -	$ -
	use of vac truck / equipment hours	1.5	$ 150.00	$ 225.00

Subtotal	
Manhours	$135.00
Equipment Hrs.	$225.00
Miscellaneous	$0.00
Due 06/23/2023	**$360.00**

HOURS
MONDAY - FRIDAY
8:30 A.M. - 4:30 P.M.

MAKE CHECKS PAYABLE TO:
CONNERSVILLE UTILITIES
MAIL TO : P.O. BOX 325
CONNERSVILLE, IN 47331

BUSINESS TELEPHONE (765) 825-2158
EMERGENCY TELEPHONE (765) 825-9411
FAX TELEPHONE (765) 825-5031
EMAIL - office@connersvilleutilities.com

DRIVE UP SERVICE AVAILABLE

A NIGHT DEPOSITORY IS LOCATED NEXT TO DRIVE UP WINDOW

CONNERSVILLE UTILITIES

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Culy Contracting, LLC
5 Industrial Park Drive
PO Box 29
Winchester, IN 47394
P: (765) 584-8509
F: (765) 584-8060

Invoice

Invoice Number
7048
Invoice Date
4/20/2023

Bill To: Pleasantview Utilities
3812 W Galaxy Dr

Connersville, IN 47331

Job: PleasantviewUtil Jet Work
Location: Connersville

Job No	Customer Job No	Customer PO	Payment Terms	Due Date
MR235090			Net 15 Days	5/5/2023

	Description	Quantity	U/M	Rate/Unit	Price
3/28/2023	TV-CLEAN TO LOCATE BLOCKAGE AND MARK FOR EXCAVATION				
	VAC TRUCK DRIVE	4.00	HR	132.00	528.00
	VAC TRUCK WORK	8.00	HR	265.00	2,120.00
	TV TRUCK DRIVE	2.00	HR	105.00	210.00
	TV TRUCK WORK	2.00	HR	210.00	420.00
	LABOR	4.00	HR	60.00	240.00

Subtotal	$	3,518.00
Sales Tax (if applicable)	$	0.00
Retainage	$	0.00
Total Due	**$**	**3,518.00**

Thank you for your business!
WBE CERTIFIED

CONNERSVILLE UTILITIES
Water • Sewer • Storm Water
216 Vine Street • P.O. Box 325
Connersville, IN 47331

INVOICE

Account # 60.0036.01
Date 8/24/2023
Total $840.00

TO AVOID LATE PENALTIES, ALLOW POSTAL DELIVERY TIME BEFORE THE DUE DATE WHEN MAILING YOUR PAYMENT

Bill to:
Pleasantview Utilities
c/o Matt Sherck
3812 W Galaxy Dr
Connersville, IN 47331

Sewer - Parts
CSSALE
D142.00
C415.00

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT. MAKE CHECK PAYABLE TO: CONNERSVILLE UTILITIES

KEEP THIS PORTION FOR YOUR RECORDS.

Item #	Description	Qty	Price	Extended Amount
7/24/2023	Ran MOLE for Pleasantview Utilities on 7/24/23			
	manhours	18	$ 30.00	$ 540.00
	equipment hours	6	$ 50.00	$ 300.00

Subtotal	
Manhours	$540.00
Equipment Hrs.	$300.00
Miscellaneous	$0.00
Due 09/11/2023	**$840.00**

HOURS
MONDAY - FRIDAY
8:30 A.M. - 4:30 P.M.

MAKE CHECKS PAYABLE TO:
CONNERSVILLE UTILITIES
MAIL TO : P.O. BOX 325
CONNERSVILLE, IN 47331

BUSINESS TELEPHONE (765) 825-2136
EMERGENCY TELEPHONE (765) 825-9411
FAX TELEPHONE (765) 825-5031
EMAIL - office@connersvilleutilities.com

DRIVE UP SERVICE AVAILABLE

A NIGHT DEPOSITORY IS LOCATED NEXT TO DRIVE UP WINDOW

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Quality On Tap!
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REPORT OF THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR
Cause No. 44351-U
Pleasantview Utilities, Inc. - Wastewater

Prepared by: Richard Corey, Harold Rees and Edward Kaufman

CHARACTERISTICS

Pleasantview Utilities, Inc (Pleasantview) is an Indiana, investor-owned utility that provides sewer utility service to approximately 194 customers in Fayette County, Indiana. Pleasantview's common stock is owned in its entirety by Mr. Matthew Sherck. In addition to operating the Utility as its President and sole shareholder, Mr. Sherck is employed by the Fayette County Health Department.

PREVIOUS CAUSES

Cause No. 44313-U

On June 29, 2007, Pleasantview applied for an increase of 101.76% over its current rates in part to fund debt service associated with prospective long-term debt in the amount of $109,500. Pleasantview intended to use these monies to finance repairs and improvements to plant to address Indiana Department of Environmental Management (IDEM) compliance issues with respect to the wastewater treatment plant.

Since investor-owned utilities do not recover principal payments as a direct expense, the Commission rejected the Utility's proposal to recover its debt service expense on plant that had yet to be built. In its April 23, 2008 order, the Commission limited Pleasantview's increase to 12.82%, authorizing a monthly charge for sewer service of $24.38.

While Pleasantview has recently received approval from IDEM to construct certain projects at its wastewater treatment plant, the OUCC believes that in order to ensure that funding these improvements is the most prudent course of action, the Utility should conduct and provide a complete review of alternatives, including a cost-benefit analysis of connecting to the City of Connersville. In response to OUCC Data Request No. 1.9, Pleasantview stated that an estimate of costs associated with connecting Pleasantview to the Connersville wastewater system was completed ten years ago, resulting in a $500,000 estimate. Applicant also stated "[d]iscussions with Connersville Utilities regarding fees to treat the water made the project unfeasible, there [*sic*] fee would be by the gallon and cost to treat wastewater and INI was higher than company could recoup." The OUCC believes that this estimate should be updated and Pleasantview should consider this alternative in light of the extensive improvements that are needed at the wastewater treatment plant.

Operating Expense Justification

The OUCC supports the $13,700 for annual maintenance which includes $8,000 for pond maintenance, $4,500 for beginning to clean and televise the collection system, and $1,200 for some smoke testing.

FIELD HEARING

Approximately fourteen people out of a customer base of 194 connections attended the Field Hearing at the Connersville City Hall, Council Chambers, 500 N. Central Avenue, Connersville, Indiana on September 25, 2013. The OUCC filed each of the consumer

PLEASANTVIEW UTILITIES, INC. - WASTEWATER
CAUSE NUMBER 44351-U

Expense Adjustments Phase I

(1)
Salary and Wage Expense

To adjust test year salaries and wages to reflect any *pro forma* changes in wages and hours worked during the test year.

Employee	Regular Hrs Proposed	Proposed Rate	Total
Billing	130	$ 15.00	$ 1,950
		Less: Test Year Expense	(575)
		Adjustment Increase (Decrease)	$ 1,375

(2)
Maintenance Expense

To adjust test year maintenance expense to reflect the utility's average annual cost associated with system maintenance.

Estimated Cost to Televise and Clean 10% of Utility's System	$	4,500
Smoke Testing (Amortized over five years)		1,200
Pond Maintenance		8,000
		13,700
Less: Test Year Expense		(1,172)
Adjustment Increase (Decrease)	$	12,528

(3)
Insurance Expense

To adjust test year insurance expense to reflect any changes in insurance premiums that occurred during the test year.

General Liability Insurance Annual Premium Amount	$	927
Less: Test Year Expense		(725)
Adjustment Increase (Decrease)	$	202

Q 1.1: Please list the monthly duties Mr. Sherck performs to operate the wastewater utility, including an estimate of the average work hours per month for each major work function.

Duties include overseeing daily operations, billing, collections, record keeping, reporting, answering phones, oversees contractors, assists or performs repairs. Average 10 hrs per week.

Q 1.2: Please provide any and all rationale, calculations, and documentation relied upon to generate the following cost estimates:

a. $21,000 annual estimate for the Certified Operator. Please also list the Operator's major work functions and average monthly hours for each major function. This cost was set by the Certified Operator, Pleasantview was without an operator, a search for a replacement operator was done with the assistance of the Indiana Water Alliance. The operator works dayly at the treatment plant for 2 hrs to make sure it is operating properly.

b. $16,200 annual estimate for testing. Please describe which utility assets will be tested, how much each test will cost, and what the testing process entails for each asset. This is not testing of an asset, it is actual cost of effluent testing required by IDEM.

c. $13,700 annual estimate for maintenance. Please describe the scope of the proposed pond work. Pond work is annual sludge removal.

d. $12,000 proposed salary figure for Mr. Sherck for wastewater duties. Salary asked for to compensate for time spent

Q 1.3: Please explain the services provided by Hometown Engineering described as "sewer plant design" in the amount of $4,874. Please describe how this design work will be used in the future.

This was the deposit paid to Hometown Engineering to begin the design work for upgrades to the sewer plant. The work was used to get the construction permit, IDEM would not issue the permit without an engineer.

Q 1.4: Please provide the name of the current Certified Operator for the treatment plant and the level of certification he/she holds.

The Certified Operator is Gene Priddy, wastewater operator class I, certification #WW018731

Q 1.5: During heavy rain events, does raw sewage from the plant overflow into the nearby waterway? If so, what is the solution for the utility to resolve this?

No

Q 1.6: With only one currently operational blower, when does the utility expect to have the second blower repaired? What will the repair entail?
The second blower has already been repaired and is on site, will be installed at time of construction program.

Q 1.7: Please indicate if utility staff has noticed any clay tiles in the collection system that have begun to crack and deteriorate. If they have, what will the utility need to do to rehabilitate the collection system? Please provide any cost estimate for this work.
No cracking or deterioration of clay tiles has been noticed.

Q 1.8: Has the collection system been smoke tested before? If so, please provide the results of any previous tests.
Smoke testing has not been done before, plan to as part of repairs to collection system after plant improvements are completed and funds are available.

Q 1.9: Please provide any plan or estimate regarding the feasibility of connecting to the Connersville wastewater system.
Estimates done about 10 yrs ago put the project cost around $500,000. Discussions with Connersville Utilities regarding fees to treat the water made the project unfeasible, there fee would be by the gallon and cost to treat wastewater and INI was higher than company could recoup.

Q 1.10: What is the approximate route distance from Pleasantview's facilities to the Connersville system?
Route would be North from treatment plant, under St Rd 44 to Country Club Rd. approximately 6000 ft

Q 1.11: With respect to rehabilitating the utility's wastewater manholes, how many have been rehabilitated in the last five years, and how many still need that type of work?
None of the manholes have been rehabilitated in the last 5 years. Many of the manholes need updated or repaired. M.E. Simpson was hired to do manhole inspections to determine how many need repaired. Results of inspections have not yet been released due to waiting on final payment.

Q 1.12: If Pleasantview has considered rehabilitating or reconstructing its treatment plant, provide any descriptions/estimates of that possibility that have been prepared (preliminary or otherwise).

Q 1.13: Please provide documentation of any customer complaints about odors or sewage back-ups.

Do not have any ongoing complaints about odors or back-ups.

Q 1.14: Provide any current information/documents concerning any open agreed-to orders between Pleasantview and IDEM. Please explain what the utility has done to resolve any outstanding issues with IDEM.

A copy of the agreed order is attached. All the orders are being complied with, deadlines are hard to meat due to permit delays, a construction permit was just approved and loan pre-approved to begin construction of plant improvements.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 4, 2013

VIA CERTIFIED MAIL

91 7190 0005 2710 0029 3596

Mr. Matthew Sherck, President
Pleasantville Utilities, Inc.
3812 W. Galaxy Drive
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: 327 IAC 3 Construction
Permit Application
Plans and Specifications for
Pleasantview Utilities, Inc.
Wastewater Treatment Plant
Improvements
Permit Approval No. 20779
Connersville, Indiana
Fayette County

The application, plans and specifications, and supporting documents for the above-referenced project have been reviewed and processed in accordance with rules adopted under 327 IAC 3. Enclosed is the Construction Permit (Approval No. 20779), which applies to the construction of the above-referenced proposed wastewater treatment plant improvements to be located at 3812 W. Galaxy Drive.

Please review the enclosed permit carefully and become familiar with its terms and conditions. In addition, it is imperative that the applicant, consulting architect/engineer (A/E), inspector, and contractor are aware of these terms and conditions.

It should be noted that any person affected or aggrieved by the agency's decision in authorizing the construction of the above-referenced facility may, within fifteen (15) days from date of mailing, appeal by filing a request with the Office of Environmental Adjudication for an adjudicatory hearing in accordance with IC 4-21.5-3-7 and IC 13-15-6. The procedure for appeal is outlined in more detail in Part III of the attached construction permit.

Plans and specifications were prepared by Hometown Engineering, LLC, and certified by Ms. Ethel L. Morgan, P.E., and submitted for review on June 3, 2013, with additional information submitted on August 9, and August 19, 2013.

Any questions concerning this permit may be addressed to Mr. Dharmendra Parikshak, of our staff, at 317/232-8660. Questions concerning appeal procedures should be addressed to the Office of Environmental Adjudication, at 317/232-8591.

Sincerely,

Dale T. Schnaith, Chief
Facility Construction and
Engineering Support Section
Office of Water Quality

Project No. PS-1419X
Enclosures
cc: Fayette County Health Department
Fayette County Commissioner
Ethel L. Morgan, P.E., Hometown Engineering, LLC
Marty Blake, INDOT
Jack Delaney, Chicago Airports District Office

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AUTHORIZATION FOR CONSTRUCTION OF
WATER POLLUTION TREATMENT/CONTROL FACILITY
UNDER 327 IAC 3

DECISION OF APPROVAL

Pleasantville Utilities, Inc., in accordance with the provisions of IC 13-15 and 327 IAC 3 is hereby issued a permit to construct the proposed wastewater treatment plant improvements to be located at 3812 W. Galaxy Drive. The permittee is required to comply with requirements set forth in Parts I, II and III hereof. The permit is effective pursuant to IC 4-21.5-3-4(d). If a petition for review and a petition for stay of effectiveness are filed pursuant to IC 13-15-6, an Environmental Law Judge may be appointed for an adjudicatory hearing. The force and effect of any contested permit provision may be stayed at that time.

NOTICE OF EXPIRATION DATE

Authorization to initiate construction of the proposed wastewater treatment plant improvements shall expire at midnight September 1, 2014. In order to receive authorization to initiate construction beyond this date, the permittee shall submit such information and forms as required by the Indiana Department of Environmental Management. It is requested that this information be submitted sixty (60) days prior to the expiration date to initiate construction. This permit shall be valid for a period of five (5) years from the date below for full construction completion.

Signed this 4th day of September, 2013, for the Indiana Department of Environmental Management.

Dale T. Schnaith, Chief
Facility Construction and
Engineering Support Section
Office of Water Quality

WATER POLLUTION TREATMENT/CONTROL FACILITY DESCRIPTION

The utility currently operates a Class I treatment facility consisting of two parallel extended aeration package plants (a 0.06 MGD plant and a 0.0167 MGD plant) followed by two polishing ponds and effluent flow monitoring. The effluent flow from two package treatment plants was designed to recombine before entering the first polishing pond. The 0.0167 MGD package plant is not functional and is currently abandoned. The surge tank and aerobic digester in the 0.06 MGD package plant are being used as aeration tanks. The treatment facility has been experiencing significant compliance issues such as wet weather caused effluent violations, bypassing and overflows for a very long time. Also, the treatment facility does not have a chlorine contact tank. There is an outstanding Agreed Order No. 2005-14957-W.

The proposed wastewater treatment plant improvements include:

- Removal and disposal of abandoned 0.0167 MGD package plant.
- Addition of 1-inch manual bar screen in the existing splitter box to be modified for this purpose.
- New flow splitter/control box to split/control influent wastewater flows to 0.06 MGD treatment plant or 30,698 gallon surge/flow equalization tank.
- New 30,698 gallon surge/flow equalization tank with fine bubble diffusers, two solids handling sewage ejector pumps with force main discharging back into the flow splitter/control box, and emergency gravity overflow pipe to aeration tank.
- New 332 SCFM backup blower and air piping modifications.
- Conversion of existing surge tank and aerobic digester (currently used for aeration) to liquid sludge storage.
- New junction chamber to divert effluent flow from the polishing pond to new chlorine contact tank.
- New 12' diameter chlorine contact tank, chlorine and sodium sulfite tablet feeders.
- New 8" diameter Palmer Bowlus flume installed in a 4' diameter manhole and relocation of existing ultrasonic flow meter.
- New junction chamber to divert effluent flows to new outfall.
- Site work, site piping and valves etc.

The utility completed manhole inspection as well as flow monitoring to accurately measure treatment plant effluent flows. The utility plans to conduct smoke testing and sewer televising to identify collection system improvement needs which will be implemented in the second phase. Also, the utility plans to inspect customer connections to confirm presence or absence of sump pumps. If the influent wastewater flows are not reduced by the collection system improvements to be implemented in

second phase, additional treatment plant improvements will be implemented in the third phase.

CONDITIONS AND LIMITATIONS TO THE AUTHORIZATION FOR CONSTRUCTION OF WATER POLLUTION TREATMENT/CONTROL FACILITY

During the period beginning on the effective date of this permit and extending until the expiration date, the permittee is authorized to construct the above described water pollution treatment/control facility. Such construction shall conform to all provisions of State Rule 327 IAC 3 and the following specific provisions:

PART I

SPECIFIC CONDITIONS AND LIMITATIONS TO THE CONSTRUCTION PERMIT

Unless specific authorization is otherwise provided under the permit, the permittee shall comply with the following conditions:

1. All local permits shall be obtained before construction is begun on this project.

2. If pollution or nuisance conditions are created, immediate corrective action will be taken by the permittee.

3. Additional treatment facilities shall be installed if the proposed facilities prove to be inadequate or cannot meet applicable federal or state requirements.

4. If construction is located within a floodway, a permit may also be required from The Department of Natural Resources prior to the start of construction. It is the permittee's responsibility to coordinate with that agency and obtain any required approvals if applicable. Questions may be directed to the Technical Services Section, Division of Water at 317/232-4160.

5. If this project includes a change in design flow, addition of new treatment unit(s), or modification/removal of existing treatment unit(s), an NPDES Permit modification will likely be required. This would include any CSO treatment addition/modification. Questions may be directed to the NPDES Permit Section, Office of Water Quality at 317/233-0469.

6. After construction and before start up of the sewage treatment facilities, the Commissioner shall be notified of the date of start up and the name of the properly certified operator in responsible charge.

Checklist for Construction Project
Design Summary

I. GENERAL

1. Applicant: Pleasantview Utilities, Inc.

2. Project Name and Location: Wastewater Treatment Plant (WWTP) Improvements

3. Project Number: PS-1419X

4. Engineer (Consultant): Hometown Engineering, LLC

5. NPDES Permit Number: IN0044776

   A. Date of Final Permit Issuance: May 31, 2012

   B. Expiration Date: May 31, 2017

6. Remarks:

   A. Description of Present Situation: The utility currently operates a Class I treatment facility consisting of two parallel extended aeration package plants (a 0.06 MGD plant and a 0.0167 MGD plant) followed by two polishing ponds and effluent flow monitoring. The effluent flow from two package treatment plants was designed to recombine before entering the first polishing pond. The 0.0167 MGD package plant is not functional and is currently abandoned. The surge tank and aerobic digester in the 0.06 MGD package plant are being used as aeration tanks. The treatment facility has been experiencing significant compliance issues such as wet weather caused effluent violations, bypassing and overflows for a very long time. Also, the treatment facility does not have a chlorine contact tank. There is an outstanding Agreed Order No. 2005-14957-W.

   B. Description of Proposed Facilities:

   - Removal and disposal of abandoned 0.0167 MGD package plant.
   - Addition of 1-inch manual bar screen in the existing splitter box to be modified for this purpose.
   - New flow splitter/control box to split/control influent wastewater flows to 0.06 MGD treatment plant or 30,698 gallon surge/flow equalization tank.

- New 30,698 gallon surge/flow equalization tank with fine bubble diffusers, two solids handling sewage ejector pumps with force main discharging back into the flow splitter/control box, and emergency gravity overflow pipe to aeration tank.
- New 332 SCFM backup blower and air piping modifications.
- Conversion of existing surge tank and aerobic digester (currently used for aeration) to liquid sludge storage.
- New junction chamber to divert effluent flow from the polishing pond to new chlorine contact tank.
- New 12' diameter chlorine contact tank, chlorine and sodium sulfite tablet feeders.
- New 8" diameter Palmer Bowlus flume installed in a 4' diameter manhole and relocation of existing ultrasonic flow meter.
- New junction chamber to divert effluent flows to new outfall.
- Site work, site piping and valves etc.

The utility completed manhole inspection as well as flow monitoring to accurately measure treatment plant effluent flows. The utility plans to conduct smoke testing and sewer televising to identify collection system improvement needs which will be implemented in the second phase. Also, the utility plans to inspect customer connections to confirm presence or absence of sump pumps. If the influent wastewater flows are not reduced by the collection system improvements to be implemented in second phase, additional treatment plant improvements will be implemented in the third phase.

7. Estimated Project Cost: $110,000

II. DESIGN DATA

1. Current Population: 600

2. Design Year and Population: Year 2030 and 600

3. Design P.E.: 600

4. Design Flow: 60,000 gpd

5. Average Design Peak Flow: 90,000 gpd

6. Maximum Plant Flow Capacity: 90,000 gpd

Pleasantview Utilities
Cause No. 44351U
Engineering Analysis
September 30, 2013

Prepared by Ethel L. Morgan, PE
HomeTown Engineering, LLC

This engineering analysis is prepared at the request of Harold Rees, PE, OUCC in response to his questions regarding the recommended improvements at the Pleasantview Utilities Wastewater Utility.

Pleasantview Utilities provides wastewater service to 176 houses and 19 two-bedroom apartments. An average daily flow of 60,260 gallons per day (gpd) is calculated using *Ten States Standards* and *SE13*. Table 1 provides the anticipated raw wastewater characteristics for this utility using *Ten States Standards*. The values in *Ten States Standards* have been used because the raw water characteristics identified in the Monthly Reports of Operation for the utility are lower.

Table 1
Influent Wastewater Characteristics

	Concentration (mg/l)	Daily Load (lbs)
Influent CBOD[1]	204	102
TSS[2]	240	120
NH3-N	36	18

1 – Based on .17 lbs per capita per day
2 - Based on .20 lbs per capita per day

The existing wastewater treatment plant, a packaged plant rated to treat 60,000 gpd, was constructed in 1974. The existing facilities include an abandoned equalization tank, two polishing ponds, and chlorination in advance of the ponds. The original surge tank and digester have been converted to aeration capacity. Two blowers and a flow meter are in service. The original blower can supply 149 cfm of air and a new blower can supply 332 cfm. The new blower and the flow meter were installed in 2012.

The utility has been under an agreed order since 2007 as a result of non-compliance issues, including the abandonment of the surge tank, sanitary sewer overflows, lack of sludge wasting facilities, inadequate flow measurement facilities, inadequate disinfection facilities, and excessive infiltration and inflow (I/I).

HomeTown Engineering was retained in 2012 to assess the treatment plant and provide recommendations for improvements to bring the WWTP into compliance.

The existing packaged treatment plant is adequate to treat the average daily flows to the WWTP. During August and September of 2012, average daily water usage was about 40,000 gpd and average daily dry weather flows to the WWTP was about 20,000 gpd. The peak flow to the wastewater treatment plant during the flow-monitoring period in the spring of 2013 was about 325,000 gpd.

Based on the results of the flow monitoring, HomeTown Engineering made certain recommendations for improvements to bring the utility into compliance during dry weather periods. These recommendations include:

1. An influent flow control and splitter box including an influent bar screen,
2. A new flow equalization basin,
3. One new blower,
4. Conversion of the existing surge tank to digester capacity,
5. Return of the digester back to its original service,
6. Relocation of the flow meter to downstream of the polishing ponds and installation of the flow meter in a flume structure as opposed to the V-Notch weir measuring device,
7. Installation of a telemetry/SCADA system for blower control,
8. Installation of a chlorine contact tank and new chlorination and dechlorination equipment, and
9. Relocation of the final discharge point.

The existing influent splitter box will be modified to an influent bar screen. The estimated cost for this work is $1,000 for equipment and labor.

A new flow control and splitter box will be constructed to divert flows in excess of 60,000 gpd to the new equalization basin. This flow control box will also recirculate flow back to the equalization basin until the equalization basin overflows into the aeration tank. This will mitigate excess flows into the aeration tank. The estimated cost for the flow control/splitter box is $5,000.

The equalization basin will be a 30,000-gallon tank. The sizing is based on the maximum size that can be placed in the site of the abandoned equalization tank. The structure is proposed to be concrete and includes an anti-float collar. An estimated 80 CY of concrete and 800 CF of excavation are required to construct the tank. The estimated cost for the tank construction is $50,000 based on an excavation cost of $500/CF and a concrete cost of $600/CY. Two transfer pumps and aeration piping and diffusers are required in the tank. The installed cost for the aeration piping and diffusers is estimated at $8,000 and the transfer pumps installed on rails are estimated to cost $4,000 total.

The new blower will be identical to the blower installed in 2012, rated to provide 332 cfm. The total aeration demand for the existing and proposed improvements is 265 cfm, so the existing blower is adequate to meet aeration requirements. The new blower will

be a stand by blower as required in the NPDES Permit. The estimated cost of $2,500 was the approximate cost of the existing blower.

The conversion of the existing surge tank to digester capacity will require some minor piping revisions. The return of the digester back to its original service may also require return piping modifications. The costs of these revisions is estimated at $5,000.

The flow meter will be relocated to a new 4' diameter flow-metering manhole and a palmer bowlus flume will be installed as the primary flow measurement device. The estimated cost for materials, including the flume and manhole, and labor is $6,000.

The telemetry system will allow for automatic turn off of the blowers if flows exceed a pre-determined level through the aeration tank. This was included in the original compliance plan written for the utility in 2007 and will help alleviate the washout of solids from the treatment plant in high flow conditions. Based on a signal from the flow meter, the blowers will turn off. As flows recede, the blowers will automatically turn back on. This work will require modifications within the blower panel and is estimated to cost $4,000.

The revised disinfection facilities include new pellet chlorination and dechlorination systems. A 12' diameter manhole will provide contact time for the chlorination for a peak flow up to 200,000 gpd. This will provide disinfection for all but 6 of the peak flow instances seen in the flow-monitoring period. The estimated cost for the labor and material for the chlorination feed equipment, the dechlorination feed equipment, and the 12' diameter manhole is $12,000.

Approximately 175 feet of additional 8" piping is required to take the flows from the outlet of the existing polishing ponds and through the new disinfection and flow metering facilities to the new discharge point. The discharge point is being relocated in anticipation of eventually abandoning the polishing ponds. The estimated cost for the new piping is $5,200 and the estimated cost for the new discharge headwall structure is $4,800 for a total cost of $10,000 for miscellaneous piping and appurtenances.

The Total Plant improvement construction costs are estimated to be $107,500. The line item costs have been estimated based on previously bid similar projects or on the material costs available in Blue Book. The Phase 1 engineering fees are based on the actual hours and costs expended in preparing the plans and specifications for IDEM permitting and IURC submittal.

The existing sewer system comprises approximately 15,000 feet of 8" VCP pipe and 66 brick manholes. The costs for smoke testing are based on $0.40/foot, cleaning and televising on $3.00/foot, and sewer lining on $52.00/foot. These are the costs that were received in a project bid in October of 2012. The cost for manhole lining is based on an average of 10 vertical feet per manhole and a cost for lining of $30/ vertical foot.

A copy of the plans and specifications and the IDEM construction permit are attached to this report.

Ethel L. Morgan, PE
3417 South Sherman Drive Suite B
Beech Grove, IN 46107

Tel: (317) 780-8805
Fax: (317) 780-8806
E-mail: hometowneng@sbcglobal.net

PLEASANTVIEW
CONSTRUCTION COST ESTIMATE
May 30, 2013
Revised September 30, 2013

PHASE 1 – Plant Work

1. Influent Bar Screen - $1,000
2. Flow Control/Splitter Box - $5,000
3. Equalization Basin – $62,000
4. New Blower – $2,500
5. Chlorine Contact Tank - $12,000
6. Flow Metering - $6,000
7. Telemetry and/or SCADA - $4,000
8. Aeration Tank Modifications - $5,000
9. Miscellaneous Piping and Appurtenances - $10,000

Total Plant Costs $107,500 construction

PHASE 1 - Sewer Investigation

1. Smoke Testing - $6,000
2. Cleaning and Televising - $45,000

PHASE 1 – Engineering - $20,000

PHASE 2 – I/I Elimination or Treatment

1. Sewer and Manhole Lining - $800,000 OR
2. Equalization Basin - $300,000
3. Engineering - $20,000

Increased Annual O&M Costs

Electrical - $500 after Phase 1
Chemicals - $500 after Phase 1

Nothing after Phase 3 Sewer Lining
Electrical - $1,000 after Phase 3 EQ Basin
Chemicals - $500 after Phase 3 EQ Basin

INDIANA DEPARTMENT OF ENVIRONMENTAL MANA
We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

June 20, 2000

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT

COMMISSIONER OF THE DEPARTMENT OF ENVIRONMENTAL MANAGEMENT,	)	
Complainant,	)	
v.	)	**Cause No B-2486**
PLEASANT VIEW UTILITIES, INC.	)	
Respondent.	)	

NOTICE AND ORDER OF THE COMMISSIONER OF THE DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

VIA CERTIFIED MAIL No. 7099 3220 0003 6963 3334

Mr. Jack Clark, President and Registered Agent
Pleasant View Utilities, Inc.
360 South Gray Road
Connersville, IN 47331

This Notice and Order of the Commissioner of the Department of Environmental Management is issued against Pleasant View Utilities, Inc. (the "Respondent") for violation of 327 IAC 5-10-6(a), 327 IAC 3-2-1, 327 IAC 3-2-2, 327 IAC 7-7-1, and NPDES Permit No. IN 0044776 (the "Permit"). This Order is issued pursuant to IC 13-30-3-4, IC 13-30-3-10, IC 13-30-3-11, IC 13-30-3-12 and IC 4-21.5-3-6, and is based on violations found during an investigation conducted by representatives of the Indiana Department of Environmental Management (IDEM). During the investigation, it was determined that the Respondent was in violation of 327 IAC 5-10-6(a), 327 IAC 3-2-1, 327 IAC 3-2-2, 327 IAC 7-7-1, and the Permit, as specified in the following:

FINDING OF VIOLATION

1. Pursuant to 327 IAC 5-2-8(1), the Permit requires the permittee to comply with all terms and conditions of its NPDES permit, including effluent limitations. Any permit non-compliance constitutes a violation of the Clean Water Act (CWA) and the Environmental Management Act (EMA) and is grounds for enforcement action.

2. Pursuant to 327 IAC 5-2-8(3), the Permit requires the permittee to take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with the permit.

3. Pursuant to 327 IAC 5-2-8(8), the Permit requires the permittee to, at all times, maintain in good working order and efficiently operate all facilities and systems (and related appurtenances) for collection and treatment that are installed or used by the permittee and necessary for achieving compliance with terms and conditions of the permit.

4. Pursuant to 327 IAC 5-2-8(9),(10), and (11), the Permit requires the permittee to comply with monitoring, recording, and reporting requirements established in accordance with 327 IAC 5-2-13, 327 IAC 5-2-14, and 327 IAC 5-2-15.

5. Pursuant to 327 IAC 5-2-12, the Permit contains a schedule of compliance requiring the permittee to take specific steps to achieve expeditious compliance with applicable standards and limitations and other requirements, including water quality-based limitations and requirements. A schedule of compliance shall require compliance as soon as reasonably possible, but no later than required by this section.

6. Pursuant to 327 IAC 5-2-13(1), the Permit requires the permittee to monitor the mass, concentration, or other measures specified in sections 11 and 11.1 of this rule, for each pollutant specified in the permit, to assure compliance with permit terms and conditions.

7. Pursuant to 327 IAC 5-2-13(2), the Permit requires the permittee to monitor the volume of wastewater flow at monitoring points specified in the permit, including the final effluent flow from each point source.

8. Pursuant to 327 IAC 5-2-13(3), the Permit requires the permittee to monitor other parameters and conditions as specifically required in the permit.

9. Pursuant to 327 IAC 5-2-14, the Permit requires the permittee to maintain records of all monitoring information and monitoring activities as set forth in this rule.

10. Pursuant to 327 IAC 5-15-9 and 10, Permit requires the permittee to record and report the results of monitoring required under 327 IAC 5-2-13, 327 IAC 5-2-14 and 327 IAC 5-2-15.

11. Pursuant to 327 IAC 5-10-6(a), and the Permit, disinfection is required of all sanitary discharges for the annual period of April 1 through October 31.

12. Pursuant to 327 IAC 3-2-1, no person shall cause or allow the construction, installation, or modification of any water pollution treatment/control facility or sanitary sewer, without a valid construction permit issued by the commissioner.

13. Pursuant to 327 IAC 3-2-2(b), a completed construction permit application shall be submitted together with the required plans, specifications, and description of the project, a minimum of sixty (60) days in advance of the proposed date of start of construction. Construction shall not commence until all necessary state approvals and permits are obtained.

14. Pursuant to 327 IAC 7-7-1, no facility for the storage of wastewater shall be constructed or installed without prior approval of the commissioner and compliance with this rule; there shall be no discharge or seepage of wastewater from the storage facility other than controlled removal for final disposal or land application of the wastewater; and there shall be no discharge of pollutants into the waters of the state.

15. A review of records conducted on September 2, 1999 indicates that Respondent has reported thirteen NPDES permit final effluent monthly violations on its Discharge Monitoring Reports (DMRs) since October, 1996, as follows:

    a. Total Biochemical Oxygen Demand, five day (TBOD5) effluent limits were exceeded in the months of October, 1998, and January, February, April, and June, 1999;

    b. Total Suspended Solids (TSS) effluent limits were exceeded in the months of August, 1998, and June, 1999;

    c. Total Residual Chlorine (TRC) effluent limits were exceeded in the months of October, 1996, July through September, 1997, and May and June, 1998.

    An update of records conducted on May 9, 2000 indicates TBOD5 violations have continued from July through November, 1999, and TSS violations have continued from July through September, 1999.

    The above are in violation of Part I.A. "Effluent Limitations and Monitoring" of the Permit for the interim parameters for TBOD5, TSS, and TRC. The above also violate 327 IAC 5-10-6(a).

16. Inspection reports for the Respondent's facility dated February 19, 1997, October 10, 1997, June 9, 1998, and February 10, 1999 indicate severe Infiltration/Inflow (I/I) exists that causes frequent hydraulic overloads and bypassing at the headworks, where no comminutor nor screens exist. It appears that tanks have been altered from their intended

purpose. The existing surge tank does not equalize flow because it remains full at all times. Flow measurement is unsatisfactory in that only a portion of total flow is measured on a meter that is not properly calibrated. Therefore, the flow meter is not properly read nor is data properly recorded. The duration and quantity of bypasses are frequently not reported. No sampling log has been available and no records have been on site.

These occurrences are in violation of Part I.A."Effluent Limitations and Monitoring" of the Permit for the parameter of flow. The occurrences also violate 327 IAC 3-2-1, 327 IAC 3-2-2(b), and 327 IAC 5-2-14.

17. Inspection reports for the Respondent's facility dated February 19, 1997, October 10, 1997, June 9, 1998, and February 10, 1999 indicate that the treatment plant is designed and operated as two parallel flows through two separate treatment processes, neither of which contains any chlorine contact tank. All treatment units are dirty and in poor repair. Each of the two separate treatment processes has an aeration tank, one of which is of much smaller volume. The larger aeration tank contains a healthy biomass, however no secondary sludge is wasted, so all solids eventually pass through to the polishing ponds. The smaller aeration tank has no biomass and no functional aeration; raw sewage flows through it, receiving no treatment, and then flows into the polishing ponds. It is consistently observed that some floating trash and bulking solids are on the secondary clarifiers and all sludge is eventually washed into the polishing ponds. Here, it accumulates to fill the ponds until there is insufficient remaining capacity for their design purpose of waste stabilization. There is an unapproved sludge lagoon located outside the facility fence where, in the past, sludge has been flushed from both polishing ponds.

These occurrences are in violation of Part II.A. "General Conditions" and Part II.B."Management Requirements" of the Permit. The occurrences also violate 327 IAC 3-2-1, 327 IAC 3-2-2(b), and 327 IAC 7-7-1.

18. The Permit contains a thirty-six month compliance schedule for new effluent limits that is not being met. A six month progress report was due January 1, 1998 to describe methods selected for meeting new final requirements for ammonia nitrogen, biochemical oxygen demand, total suspended solids, dissolved oxygen, and total residual chlorine. To date, no progress report has been received by IDEM. The Permit compliance schedule further requires that if construction is not found by the permittee to be necessary in order to meet the new final limits, then notification of this must be sent to IDEM. To date, notification that construction is unnecessary for meeting new effluent limits has not been received by IDEM. The Permit compliance schedule also requires that if construction is found to be necessary, then a construction permit application, including plans and specifications, shall be submitted to IDEM. A construction permit application package was due by September 1, 1998, and initiation of construction was to commence by June 1, 1999. Also,

according to the Permit, a second, written progress report was to be submitted to IDEM when construction was initiated, by June 1, 1999. To date, neither construction permit application nor plans and specifications have been received by IDEM. No construction has been initiated by Respondent, nor has any second, written progress report been received by IDEM. In addition, the Permit compliance schedule requires that if the permittee fails to comply with any date in the schedule by more than fourteen (14) days, the permittee shall submit a written notice of noncompliance, delineating the cause of noncompliance, any remedial action taken or planned,and the probability of meeting the date fixed for compliance with final requirements. To date, no written notice of noncompliance has been received by IDEM.

These occurrences are in violation of Part I.D. "Schedule of Compliance" of the Permit and 327 IAC 5-2-12.

19. The Respondent received the Notice of Violation on November 10, 1999.

20. The Notice of Violation contained an offer to enter into an Agreed Order containing the actions required to correct the violation.

21. More than sixty (60) days have elapsed since the Respondent was offered the opportunity to enter into an Agreed Order.

22. The Respondent has not entered into an Agreed Order resolving these violations.

ORDER

1. The Respondent shall immediately cease and desist violation of 327 IAC 3-2-1, 327 IAC 3-2-2, 327 IAC 7-7-1, and the Permit.

2. The Respondent shall, within thirty (30) days of the effective date of this Order, submit a Compliance Plan (CP) to the Office of Enforcement that addresses specific steps toward full, long-term compliance with the Permit. The CP shall also include: "as-built" plans and specifications for existing wastewater treatment plant modifications; a sludge management plan; and a construction schedule, with milestone dates, for needed improvements.

3. The CP is subject to the approval of IDEM. If the plan is deemed inadequate by IDEM, a revised CP shall be submitted within fifteen (15) days of receipt of notice from IDEM of the inadequacies thereof. If after the submission of the revised document IDEM still finds the document to be inadequate, then IDEM will request further modification of the CP as necessary to meet IDEM's requirements. If the subsequently submitted modification does

not meet IDEM's approval, IDEM will suggest specific modifications to be to the CP and require re-submittal by a specific date. If the IDEM-suggested modifications are not incorporated into the CP by the Respondent (or an alternative plan is not submitted by the Respondent) by the specified date or are not approved by IDEM, the Respondent will be subject to additional penalties as described below. The Respondent, upon receipt of written notification by IDEM, shall immediately implement the approved plan and adhere to the milestone dates therein. The approved plan shall be incorporated into this Order of the Commissioner and shall be deemed an enforceable part thereof.

4. The Respondent shall pay a civil penalty of Nine Thousand Dollars ($9,000). This penalty shall be remitted to the Department of Environmental Management within thirty (30) days of the effective date of this Order. Checks shall be made payable to the Environmental Management Special Fund, with the Cause Number indicated on the check, and mailed to: Cashier, IDEM, 100 N. Senate Avenue, P. O. Box 7060, Indianapolis, IN 46207-7060.

5. In the event the following terms and conditions are violated, the Complainant shall assess and the Respondent shall pay an additional penalty in the following amounts:

Violation	Penalty
Paragraphs 2., 3.	$500 per week the CP is not submitted, and/or any required CP modifications are submitted late, or any milestone dates are not met.

6. This Order shall apply to and be binding upon the Respondent, its officers, directors, principals, agents, successors, subsidiaries, and assigns.

7. The Respondent shall provide a copy of this Order, if in force, to any subsequent owners or successors before ownership rights are transferred. The Respondent shall ensure that all contractors, firms, and other persons performing work under this Order comply with the terms of this Order.

EFFECTIVE DATE OF ORDER

Pursuant to IC 13-30-3-5, this Order takes effect twenty (20) days following receipt unless you request review of this Order, before the twentieth day after receipt, by filing a written request for review with the Office of Environmental Adjudication and serving a copy of the request for review upon the Commissioner of the Indiana Department of Environmental Management. Pursuant to IC 4-21.5-3-7, you may request that the Office of Environmental Adjudication conduct a hearing to review this Order, under IC 4-21.5, in its entirety, or you may limit your request for review to specific findings of fact and/or orders contained in this Order.

Requests for review must be submitted to the Office of Environmental Adjudication and the Commissioner of the Indiana Department of Environmental Management at the following addresses:

Director
Office of Environmental Adjudication
ISTA Building, Suite 618
150 West Market Street
Indianapolis, IN 46204

Commissioner
Department of Environmental Management
IGCN, 100 North Senate
P. O. Box 6015
Indianapolis, IN 46206-6015

Failure to properly submit a request for review, before the twentieth day following receipt of this Order of the Commissioner, waives your right to administrative review of this Order pursuant to IC 4-21.5-3-7 and your right to a judicial review of the Order pursuant to IC 4-21.5-5-4. The petition for administrative review must contain the following information:

1. The name, address, and telephone number of each person filing the petition.

2. Identification of the interest of each petitioner in the subject of the petition.

3. A statement of facts demonstrating that the petitioner is:

   a. a person to whom the order is directed;

   b. aggrieved or adversely affected by the order; or

   c. entitled to review under any law.

4. A statement with particularity concerning the legal issues proposed for consideration in the proceedings.

The petition for administrative review should also contain the following information:

1. Identification of any persons represented by the person making the request pursuant to IC 4-21.5-3-15.

2. A statement identifying the person against whom administrative review is sought.

3. A copy of the notice of the commissioner's action issued by the department of environmental management which is the basis of the petition for administrative review.

4. A statement indicating the identification of petitioner's attorney or other representative.

If you have procedural or scheduling questions regarding your request for review you may contact the Office of Environmental Adjudication at (317) 232-8591.

DATED AT INDIANAPOLIS, INDIANA THIS 16th DAY OF June, 2000.

Lori F. Kaplan
Commissioner

cc: Fayette County Health Department
U.S. EPA, Region 5, Water Section
John W. Bodwell, Attorney at Law

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov
Michael R. Pence, *Governor*
Thomas W. Easterly, *Commissioner*

September 4, 2013

VIA CERTIFIED MAIL 91 7190 0005 2710 0029 3596

Mr. Matthew Sherck, President
Pleasantville Utilities, Inc.
3812 W. Galaxy Drive
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: 327 IAC 3 Construction
Permit Application
Plans and Specifications for
Pleasantview Utilities, Inc.
Wastewater Treatment Plant
Improvements
Permit Approval No. 20779
Connersville, Indiana
Fayette County

The application, plans and specifications, and supporting documents for the above-referenced project have been reviewed and processed in accordance with rules adopted under 327 IAC 3. Enclosed is the Construction Permit (Approval No. 20779), which applies to the construction of the above-referenced proposed wastewater treatment plant improvements to be located at 3812 W. Galaxy Drive.

Please review the enclosed permit carefully and become familiar with its terms and conditions. In addition, it is imperative that the applicant, consulting architect/engineer (A/E), inspector, and contractor are aware of these terms and conditions.

It should be noted that any person affected or aggrieved by the agency's decision in authorizing the construction of the above-referenced facility may, within fifteen (15) days from date of mailing, appeal by filing a request with the Office of Environmental Adjudication for an adjudicatory hearing in accordance with IC 4-21.5-3-7 and IC 13-15-6. The procedure for appeal is outlined in more detail in Part III of the attached construction permit.

Plans and specifications were prepared by Hometown Engineering, LLC, and certified by Ms. Ethel L. Morgan, P.E., and submitted for review on June 3, 2013, with additional information submitted on August 9, and August 19, 2013.

Any questions concerning this permit may be addressed to Mr. Dharmendra Parikshak, of our staff, at 317/232-8660. Questions concerning appeal procedures should be addressed to the Office of Environmental Adjudication, at 317/232-8591.

Sincerely,

Dale T. Schnaith, Chief
Facility Construction and
Engineering Support Section
Office of Water Quality

Project No. PS-1419X
Enclosures
cc: Fayette County Health Department
Fayette County Commissioner
Ethel L. Morgan, P.E., Hometown Engineering, LLC
Marty Blake, INDOT
Jack Delaney, Chicago Airports District Office

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AUTHORIZATION FOR CONSTRUCTION OF
WATER POLLUTION TREATMENT/CONTROL FACILITY
UNDER 327 IAC 3

DECISION OF APPROVAL

Pleasantville Utilities, Inc., in accordance with the provisions of IC 13-15 and 327 IAC 3 is hereby issued a permit to construct the proposed wastewater treatment plant improvements to be located at 3812 W. Galaxy Drive. The permittee is required to comply with requirements set forth in Parts I, II and III hereof. The permit is effective pursuant to IC 4-21.5-3-4(d). If a petition for review and a petition for stay of effectiveness are filed pursuant to IC 13-15-6, an Environmental Law Judge may be appointed for an adjudicatory hearing. The force and effect of any contested permit provision may be stayed at that time.

NOTICE OF EXPIRATION DATE

Authorization to initiate construction of the proposed wastewater treatment plant improvements shall expire at midnight September 1, 2014. In order to receive authorization to initiate construction beyond this date, the permittee shall submit such information and forms as required by the Indiana Department of Environmental Management. It is requested that this information be submitted sixty (60) days prior to the expiration date to initiate construction. This permit shall be valid for a period of five (5) years from the date below for full construction completion.

Signed this 4th day of September, 2013, for the Indiana Department of Environmental Management.

Dale T. Schnaith, Chief
Facility Construction and
Engineering Support Section
Office of Water Quality

WATER POLLUTION TREATMENT/CONTROL FACILITY DESCRIPTION

The utility currently operates a Class I treatment facility consisting of two parallel extended aeration package plants (a 0.06 MGD plant and a 0.0167 MGD plant) followed by two polishing ponds and effluent flow monitoring. The effluent flow from two package treatment plants was designed to recombine before entering the first polishing pond. The 0.0167 MGD package plant is not functional and is currently abandoned. The surge tank and aerobic digester in the 0.06 MGD package plant are being used as aeration tanks. The treatment facility has been experiencing significant compliance issues such as wet weather caused effluent violations, bypassing and overflows for a very long time. Also, the treatment facility does not have a chlorine contact tank. There is an outstanding Agreed Order No. 2005-14957-W.

The proposed wastewater treatment plant improvements include:

- Removal and disposal of abandoned 0.0167 MGD package plant.
- Addition of 1-inch manual bar screen in the existing splitter box to be modified for this purpose.
- New flow splitter/control box to split/control influent wastewater flows to 0.06 MGD treatment plant or 30,698 gallon surge/flow equalization tank.
- New 30,698 gallon surge/flow equalization tank with fine bubble diffusers, two solids handling sewage ejector pumps with force main discharging back into the flow splitter/control box, and emergency gravity overflow pipe to aeration tank.
- New 332 SCFM backup blower and air piping modifications.
- Conversion of existing surge tank and aerobic digester (currently used for aeration) to liquid sludge storage.
- New junction chamber to divert effluent flow from the polishing pond to new chlorine contact tank.
- New 12' diameter chlorine contact tank, chlorine and sodium sulfite tablet feeders.
- New 8" diameter Palmer Bowlus flume installed in a 4' diameter manhole and relocation of existing ultrasonic flow meter.
- New junction chamber to divert effluent flows to new outfall.
- Site work, site piping and valves etc.

The utility completed manhole inspection as well as flow monitoring to accurately measure treatment plant effluent flows. The utility plans to conduct smoke testing and sewer televising to identify collection system improvement needs which will be implemented in the second phase. Also, the utility plans to inspect customer connections to confirm presence or absence of sump pumps. If the influent wastewater flows are not reduced by the collection system improvements to be implemented in

second phase, additional treatment plant improvements will be implemented in the third phase.

CONDITIONS AND LIMITATIONS TO THE AUTHORIZATION FOR CONSTRUCTION OF WATER POLLUTION TREATMENT/CONTROL FACILITY

During the period beginning on the effective date of this permit and extending until the expiration date, the permittee is authorized to construct the above described water pollution treatment/control facility. Such construction shall conform to all provisions of State Rule 327 IAC 3 and the following specific provisions:

PART I

SPECIFIC CONDITIONS AND LIMITATIONS TO THE CONSTRUCTION PERMIT

Unless specific authorization is otherwise provided under the permit, the permittee shall comply with the following conditions:

1. All local permits shall be obtained before construction is begun on this project.

2. If pollution or nuisance conditions are created, immediate corrective action will be taken by the permittee.

3. Additional treatment facilities shall be installed if the proposed facilities prove to be inadequate or cannot meet applicable federal or state requirements.

4. If construction is located within a floodway, a permit may also be required from The Department of Natural Resources prior to the start of construction. It is the permittee's responsibility to coordinate with that agency and obtain any required approvals if applicable. Questions may be directed to the Technical Services Section, Division of Water at 317/232-4160.

5. If this project includes a change in design flow, addition of new treatment unit(s), or modification/removal of existing treatment unit(s), an NPDES Permit modification will likely be required. This would include any CSO treatment addition/modification. Questions may be directed to the NPDES Permit Section, Office of Water Quality at 317/233-0469.

6. After construction and before start up of the sewage treatment facilities, the Commissioner shall be notified of the date of start up and the name of the properly certified operator in responsible charge.

7. The sewage treatment plant must be capable of providing the same degree of treatment during construction as prior to expansion of the existing facilities. If this is not feasible, the plans for reduced degree of treatment must be submitted to the Department of Environmental Management for consideration of approval.

8. Additional treatment facilities will be installed if the proposed facilities fail to provide adequate control or if necessary for compliance with more stringent Federal or State pretreatment standards or requirements promulgated subsequent to the date of this approval.

Failure to meet guidelines as set forth in the above conditions could be subject to enforcement proceedings as provided by 327 IAC 3-5-3.

PART II

GENERAL CONDITIONS

1. No significant or material changes in the scope of the plans or construction of this project shall be made unless the following provisions are met:

   a. Request for permit modification is made 60 days in advance of the proposed significant or material changes in the scope of the plans or construction;

   b. Submit a detailed statement of such proposed changes;

   c. Submit revised plans and specifications including a revised design summary; and

   d. Obtain a revised construction permit from this agency.

2. This permit may be modified, suspended, or revoked for cause including, but not limited to the following:

   a. Violation of any term or conditions of this permit;

   b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts.

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

PART III

APPEALS PROCEDURE

Anyone wishing to challenge this agency's decision for authorizing the construction of this facility may do so, provided that a petition for administrative review is filed as required by IC 4-21.5-3-7. The petition must be submitted within fifteen (15) days of the date of mailing of this permit notification. The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by this decision, or otherwise entitled to review by law. Additionally, IC 13-15-6-2 requires that your petition include:

1. The name and address of the person making the request;

2. The interest of the person making the request;

3. Identification of any persons represented by the person making the request;

4. The reasons, with particularity, for the request;

5. The issues, with particularity, proposed for consideration at the hearing; and

6. Identification of the permit terms and conditions which, in the judgement of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing permits of the type granted or denied by the Assistant Commissioner's action.

7. Pursuant to IC 4-21.5-3-1(f), any document serving as a petition for review or review and stay must be filed with the Office of Environmental Adjudication. Filing of such a document is complete on the earliest of the following dates:

   a. The date on which the petition is delivered to the Office of Environmental Adjudication, Indiana Government Center North, 100 North Senate Avenue, Room 501, Indianapolis, Indiana 46204;

   b. The date of the postmark on the envelope containing the petition, if the petition is mailed by United States mail; or

   c. The date on which the petition is deposited with a private carrier, as shown by a receipt issued by the carrier, if the petition is sent by private carrier.

Checklist for Construction Project
Design Summary

I. GENERAL

1. Applicant: Pleasantview Utilities, Inc.

2. Project Name and Location: Wastewater Treatment Plant (WWTP) Improvements

3. Project Number: PS-1419X

4. Engineer (Consultant): Hometown Engineering, LLC

5. NPDES Permit Number: IN0044776

   A. Date of Final Permit Issuance: May 31, 2012

   B. Expiration Date: May 31, 2017

6. Remarks:

   A. Description of Present Situation: The utility currently operates a Class I treatment facility consisting of two parallel extended aeration package plants (a 0.06 MGD plant and a 0.0167 MGD plant) followed by two polishing ponds and effluent flow monitoring. The effluent flow from two package treatment plants was designed to recombine before entering the first polishing pond. The 0.0167 MGD package plant is not functional and is currently abandoned. The surge tank and aerobic digester in the 0.06 MGD package plant are being used as aeration tanks. The treatment facility has been experiencing significant compliance issues such as wet weather caused effluent violations, bypassing and overflows for a very long time. Also, the treatment facility does not have a chlorine contact tank. There is an outstanding Agreed Order No. 2005-14957-W.

   B. Description of Proposed Facilities:

   - Removal and disposal of abandoned 0.0167 MGD package plant.
   - Addition of 1-inch manual bar screen in the existing splitter box to be modified for this purpose.
   - New flow splitter/control box to split/control influent wastewater flows to 0.06 MGD treatment plant or 30,698 gallon surge/flow equalization tank.

- New 30,698 gallon surge/flow equalization tank with fine bubble diffusers, two solids handling sewage ejector pumps with force main discharging back into the flow splitter/control box, and emergency gravity overflow pipe to aeration tank.
- New 332 SCFM backup blower and air piping modifications.
- Conversion of existing surge tank and aerobic digester (currently used for aeration) to liquid sludge storage.
- New junction chamber to divert effluent flow from the polishing pond to new chlorine contact tank.
- New 12' diameter chlorine contact tank, chlorine and sodium sulfite tablet feeders.
- New 8" diameter Palmer Bowlus flume installed in a 4' diameter manhole and relocation of existing ultrasonic flow meter.
- New junction chamber to divert effluent flows to new outfall.
- Site work, site piping and valves etc.

The utility completed manhole inspection as well as flow monitoring to accurately measure treatment plant effluent flows. The utility plans to conduct smoke testing and sewer televising to identify collection system improvement needs which will be implemented in the second phase. Also, the utility plans to inspect customer connections to confirm presence or absence of sump pumps. If the influent wastewater flows are not reduced by the collection system improvements to be implemented in second phase, additional treatment plant improvements will be implemented in the third phase.

7. Estimated Project Cost: $110,000

II. DESIGN DATA

1. Current Population: 600

2. Design Year and Population: Year 2030 and 600

3. Design P.E.: 600

4. Design Flow: 60,000 gpd

5. Average Design Peak Flow: 90,000 gpd

6. Maximum Plant Flow Capacity: 90,000 gpd

Note – The package plant (with the proposed surge/flow equalization tank) is expected to handle 90,000 gpd without violating NPDES permit limits.

7. Design Waste Strength

   A. CBOD: 204 mg/l (102 lbs/day)

   B. TSS: 248 mg/l (124 lbs/day)

   C. NH_3-N: 36 mg/l (18 lbs/day)

   D. P: N/A

8. NPDES Permit Limitation on Effluent Quality:

   A. CBOD: 20 mg/l (summer), 25 mg/l (winter)

   B. SS: 24 mg/l (summer), 30 mg/l (winter)

   C. NH_3-N: 1.5 mg/l (summer), 2.1 mg/l (winter)

   D. P: N/A

   E. E. Coli: 235 count/100 ml (daily maximum)
      125 count/100 ml (monthly average)

   F. Chlorine Residual: 0.02 mg/l (daily maximum)
      0.01 mg/l (monthly average)

   G. pH: 6.0 – 9.0 s.u.

   H. D.O. (daily minimum): 6.0 mg/l (summer), 5.0 mg/l (winter)

9. Receiving Stream:

   A. Name: Unnamed tributary to Williams Creek

   B. Tributary to: Whitewater River

   C. Stream Uses: Full Body Contact Recreation Use and shall be capable of supporting a well-balanced warm water aquatic community

   D. 7-day, 1-in-10 year low flow: 0.0 CFS

III. TREATMENT UNITS

Flow Meter (New)

1. Type: Palmer bowlus flume (New, 8" diameter) and ultrasonic meter (existing relocated)
2. Location: Effluent
3. Indicating, recording and totalizing: Yes

Screen (in existing splitter box to be modified)

1. Type: Coarse bar screen
2. Number and capacity: One @ 1.0 MGD
3. Bar spacing and slope: 1-inch and 45 degree
4. Method of cleaning: Manual
5. Disposal of screenings: Landfill

Flow Splitter/Control Box (New) to split/control influent wastewater to existing treatment plant and surge/flow equalization tank.

Surge/Flow Equalization Tank (New)

1. Number and size of units: One, 36' x 12' x 9.5' SWD or 30,698 gallons
2. Method of flow diversion to unit: By flow splitter/control box (over 3' adjustable rectangular weir)
3. Air and mixing provided: Yes
4. Method and control of flow return: Float control and pumping back to flow splitter/control box
5. Description of unit operation: Excessive influent wastewater flow will be diverted to surge/flow equalization tank by flow splitter/control box.

Excessive wastewater stored in surge/flow equalization tank will be pumped back to flow splitter/control box based on float/sensor levels in surge/flow equalization tank, or to aeration tank by emergency overflow gravity pipe.

6. Method of sludge removal: Manual pumping and sludge hauling

Note – The proposed surge/flow equalization tank is to equalize excessive wet weather flows to the package treatment plant in order to provide for some relief and to achieve compliance during certain wet weather days. The plant may not achieve compliance with the NPDES permit limits during higher peak wet weather flows until issues within the collection system have been resolved and infiltration/inflow sources have been removed/reduced. The goal will be to minimize influent wastewater flows to the plant to the extent that the surge/flow equalization tank can help the plant achieve compliance with the NPDES permit limits.

Activated Sludge (Existing, second blower proposed)

1. Type of activated sludge process: Extended aeration

2. Number and size of units: Two, 36' x 12' x 9.67' SWD (each), 60,000 gallons (8,021 ft3) per manufacturer information

3. Detention time (hrs): 24 hrs

4. Organic loading (lb BOD /1000 cf): 12.7 lb BOD /1000 cf

5. Type of aeration equipment: Coarse bubble diffusers

6. Type and size of blowers: Two, 332 SCFM rotary lobe blowers (one existing and one new)

7. Air required (itemize, cfm): Aeration (145 SCFM), sludge storage tank (60 SCFM), surge/flow equalization tank (38 SCFM), air lift pumps (20 SCFM) post aeration (1 SCFM) – 264 SCFM total

8. Provisions for speed adjustment: No (Note - Automatic on-off switch to shut-off air during high flows to protect biomass from washing out)

9. Air provided: 332 SCFM

10. Ventilation in the blower room: N/A

11. Number and capacity of return sludge pump: Two, 22 to 65 gpm (Existing)

12. Method of return sludge rate control: Air lift pumps and weir

13. Return sludge rate as % of design flow: 50 to 150%

14. Provisions for return rate metering: No (Visual measurement)

15. Location of return sludge discharge: Aeration tanks

16. Facilities to isolate units: Yes

17. Facilities for flow split control: Yes

Nitrification System (Existing, second blower proposed)

1. Type of nitrification system: Extended aeration

2. Ammonia loading: 36 mg/l (18 lbs/day)

3. Additional oxygen demand: 41 SCFM

4. Air supply system: Two, 332 SCFM rotary lobe blowers (one existing and one new) and coarse bubble diffusers

5. Hydraulic detention time (hrs): 24 hrs

6. Mean cell residence time (days): 20 days @ 3,000 mg/l MLSS

Secondary Clarifiers (Existing)

1. Type of clarifiers: Square clarifiers with 9' 6" deep hopper bottom (part of the package plant)

2. Number and size of units: Two, 12' x 12' x 12' SWD including 9' 6" hopper bottom (per manufacturer information)

3. Surface settling rate (gpd/sf):

   a. at the design flow: 208 gpd/sf @ 60,000 gpd

   b. at the influent pumping rate: N/A

   c. at the equalized flow rate: 312.5 gpd/sf @ 90,000 gpd

4. Detention time (hrs): 4 hours with both clarifiers (total 10,000 gallon per manufacturer information)

5. Type of sludge removal mechanism: Air lift pumps

6. Weir overflow rate: 5,000 gpd/LF with both clarifiers

7. Disposal of scum: Sludge holding tanks

8. Facilities for unit isolation: Yes

9. Facilities for flow split control: Yes

Two-day Lagoon (Existing, two ponds in series)

Disinfection (New)

1. Type of disinfectant used: Chlorine tablets

2. Size of contact tank: 12' diameter and 3' SWD (2,537 gallons)

3. Contact time: 41 minutes @ 90,000 gpd

4. Type of disinfectant feeders: Tablet feeder (located upstream of chlorine contact tank)

5. Capacity of the feeders: 200,000 gpd

6. Disinfectant dosage: 8 mg/l

7. Scum control baffle: Yes

8. Source of the disinfectant feed water: N/A

9. Breakwater tank for the feed water: N/A

10. Bypass: No

11. Drain for tank: No

12. Ventilation in chlorine room: N/A

13. Safety equipment: N/A

De-Chlorination (New)

1. Chemical used: Sodium sulfite tablets

2. Type of feeders: Tablet feeder

3. Capacity of feeders: 200,000

4. Dosage: 1.78 mg/l per mg/l of chlorine

5. Type of diffuser: N/A

6. Diffuser location: N/A

7. Equipment (Tablet feeder) location: Downstream of chlorine contact tank

8. Ventilation provided: N/A

9. Safety equipment: N/A

Post-aeration (New)

1. Type of aeration: Diffused aeration

2. Number of units: One

3. Size of units: Coarse bubble diffuser at the end of the chlorine contact tank

4. Aeration provided: 1 SCFM

5. Expected effluent D.O.: 6.0 mg/l

Sludge Storage Tanks (Existing, conversion of existing surge tank and aerobic digester [currently used for aeration])

1. Number and size of units: Two (11' x 9' x 9.5' [7,000 gallons] existing surge tank, 13' x 9' x9.5' SWD [8,000 gallons] existing aerobic digester)

2. Detention time: 39 days @ 386 gpd of 2% sludge

3. Organic loading: 32.1 lbs per day per 1,000 ft3

4. Air supply: 60 SCFM

5. Decanting method: Gravity line from top of the storage tank

Sludge Disposal (Existing)

1. Ultimate disposal method of sludge: Municipal WWTP

2. Expected solids content of sludge (by the principal method of disposal): 2%

3. Location of disposal site: Determined by contract hauler

4. Ownership of the disposal site: Determined by contract hauler

5. Availability of sludge transport equipment: Contracted

IV. MISCELLANEOUS

A. Laboratory equipment: Contracted

B. Safety equipment: Yes

C. Plant site fence: Yes

D. Handrail for the tanks: No

E. Units, unit operation, and plant bypasses: No

F. Flood elevation (10, 25, or 100 year flood): Existing

G. Provisions to maintain the same degree of treatment during construction: Yes

I. Standby power equipment: No

J. Site inspection: Yes (By owner)

K. Statement in the specifications as to the protection against any adverse environmental effect (e.g., dust. noise, soil erosion) during construction: Yes

L. Hoists for removing heavy equipment: No

M. Adequate sampling facilities: Yes

N. Hydraulic Gradient: Yes

O. Septage receiving facilities: N/A

APPLICATION FOR WASTEWATER TREATMENT PLANT CONSTRUCTION PERMIT PER 327 IAC 3

STATE FORM 53160 (R2 / 9-08)
Approved by State Board of Accounts, 2007

Indiana Department of Environmental Management
Office of Water Quality – Mail Code 65-42
Facilities Construction Section
100 North Senate Avenue, room N1255
Indianapolis, IN 46204-2251

INSTRUCTIONS:

1. *This form must be filled out completely.*
2. *Additional pages (attachments following this form) are part of this application form and must be filled out completely.*
3. *Submission of plans, flow charts and/or schematic drawings are part of the application.*
4. *Submit the application form, additional pages, plans and specifications to the above address.*
5. *If you have any questions regarding this application, call IDEM's Office of Water Quality at (317) 232-8670.*

APPLICANT		APPLICANT'S ENGINEER	
Name Matthew Sherck		Name Ethel L. Morgan	
Company Name Pleasantview Utilities, Inc.		Company Name Hometown Engineering, LLC	
Address 3812 W. Galaxy Drive		Address 3417 South Sherman Drive, Suite B	
City Connersville		City Beech Grove	
State IN	ZIP code 47331	State IN	ZIP code 46107
Telephone number (*including area code*) (765) 309-2973		Telephone number (*including area code*) (317) 780-8805	

2013 JUN -3 A 11:33
IDEM OFFICE OF WATER QUALITY

NAME AND LOCATION OF PROPOSED FACILITY	ATTACHMENT CHECKLIST
Name Pleasantview Utilities, Inc.	A. Wastewater treatment plant design summary form: ☒ Yes
Location (*Referenced to two existing streets*) 3812 W. Galaxy Drive, Connersville, IN 47331	B. Plans and specifications: ☒ Yes
Location SR 44 and CR 350 W	C. The appropriate fee (if applicable, no fees for state or federal projects): ☒ Yes
Location	D. Identification of Potentially Affected Persons (*see note below*): ☒Yes
City Connersville	E. Mailing Labels for Potentially Affected Persons: ☒Yes
County Fayette	

Note Regarding item (D) above:
Fully identify all persons, by name and address, who may be potentially affected by the issuance of this permit, such as adjoining landowners, persons with a propriety interest, and/or persons who have complained or submitted comments about your facility. ***Under IC 4-21.5-3-4, IDEM is required to notify potentially affected persons of its permit decision.***

PERMIT APPLICATION FOR CONSTRUCTION, EXPANSION, OR MODIFICATION OF *(Check all that apply)*	FUNDING
A. Municipal wastewater treatment facility: ☐Yes	SRF Funding: ☐Yes ☒No
B. Semipublic wastewater treatment facility: ☒Yes	
C. New facility: ☐Yes	
D. Expansion or modification of existing facility: ☒Yes	

CERTIFICATION AND SIGNATURE

Application is hereby made for a permit to authorize the activities described herein. I certify that I am familiar with the information contained in this application and to the best of my knowledge and belief such information is true, complete and accurate.

Printed name of person signing	Title
Matthew Sherck	President
Signature of Applicant	Date application signed (*month, day, year*)
	5/30/2013

*Please refer to IC 13-30-10 for penalties of submission of false information**

Ethel L. Morgan, PE
3417 South Sherman Drive, Suite B • Beech Grove • Indiana 46107
E-mail: hometowneng@sbcglobal.net
Tel (317) 780-8805 • Fax (317) 780-8806 • Home (317) 359-3833

HomeTown ENGINEERING, LLC

TRANSMITTAL

TO:	Mr. Don Worley	DATE:	May 30, 2013
	Office of Water Quality	JOB:	Pleasantview Utilities
	MC 66-34, IGCN 1255	PROJECT:	Wastewater Plant Upgrades
	IDEM	RE:	Construction Permit Application
	100 North Senate Ave.	TELEPHONE #:	317-232-5579
	Indianapolis, IN 46204-2251	FAX #:	

FROM: Ethel L. Morgan, PE

WE ARE SENDING YOU:

☒ Attached Via: ☒ Mail ☐ Fed Ex ☐ UPS ☐ Courier ☐ Pick Up ☐ Hand Carry

# Copies	Date	Description
1	5/30/13	Plans and Specifications and Permit Application

THE ABOVE ARE TRANSMITTED as checked below:

☒ For approval ☐ As requested ☐ FOR BIDS DUE
☐ For your use ☐ For review and comment ☐ Other

REMARKS:

Don,

Attached is a resubmittal of the plans and specifications for Pleasantview Utilities. Per Dale Schnaith's letetr of 1/23/13, a construction permit fee has not been included.

Please give me a call if you have any questions.

Cc: Matt Sherck

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

VIA ELECTRONIC MAIL

May 31, 2012

Matt Sherk, President
Pleasantview Utilities, Inc.
3812 West Galaxy Drive
Connersville, Indiana 47331

Dear Mr. Sherk:

Re: Final NPDES Permit No. IN0044776
Pleasantview Utilities Wastewater Treatment Plant
Fayette County

Your application for a National Pollutant Discharge Elimination System (NPDES) permit has been processed in accordance with Sections 402 and 405 of the Federal Water Pollution Control Act as amended, (33 U.S.C. 1251, et seq.), and IDEM's permitting authority under IC 13-15. The enclosed NPDES permit covers your discharges to an unnamed tributary to Williams Creek. All discharges from this facility shall be consistent with the terms and conditions of this permit.

One condition of your permit requires monthly reporting of several effluent parameters. Reporting is to be done on the Monthly Report of Operation (MRO) form. This form is available on the internet at the following web site:

http://www.in.gov/idem/5104.htm

You should duplicate this form as needed for future reporting.

Another condition which needs to be clearly understood concerns violation of the effluent limitations in the permit. Exceeding the limitations constitutes a violation of the permit and may bring criminal or civil penalties upon the permittee. (See Part II.A.1 and II.A.11 of this permit). It is very important that your office and treatment operator understand this part of the permit.

Please note that this permit issuance can be appealed. An appeal must be filed under procedures outlined in IC 13-15-6, IC 4-21.5, and the enclosed public notice. The appeal must be initiated by you within 18 days from the date this letter is postmarked, by filing a request for an adjudicatory hearing with the Office of Environmental Adjudication (OEA), at the following address:

Office of Environmental Adjudication
Indiana Government Center North
100 North Senate Avenue, Room 501
Indianapolis, IN 46204

Please send a copy of any such appeal to me at IDEM, Office of Water Quality-Mail Code 65-42, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251.

The permit should be read and studied. It requires certain action at specific times by you, the discharger, or your authorized representative. One copy of this permit is also being sent to your operator to be kept at the treatment facility. You may wish to call this permit to the attention of your consulting engineer and/or attorney.

If you have any questions concerning your NPDES permit, please contact Jason House at 317/233-0470. Questions concerning appeal procedures should be directed to the Office of Environmental Adjudication, at 317/232-8591.

Sincerely,

Paul Higginbotham, Chief
Permits Branch
Office of Water Quality

Enclosures
cc: Fayette County Health Department
Joseph Mason, Certified Operator

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AUTHORIZATION TO DISCHARGE UNDER THE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., the "Act"), Title 13 of the Indiana Code, and regulations adopted by the Water Pollution Control Board, the Indiana Department of Environmental Management (IDEM) is issuing this permit to

PLEASANTVIEW UTILITIES, INC.

hereinafter referred to as "the permittee." The permittee owns and/or operates the **Pleasantview Utilities Wastewater Treatment Plant**, a minor semi-public wastewater treatment plant located at 3812 West Galaxy Drive, Connersville, Indiana, Fayette County. The permittee is hereby authorized to discharge from the outfalls identified in Part I of this permit to receiving waters consisting of an unnamed tributary to Williams Creek in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in the permit. This permit may be revoked for the nonpayment of applicable fees in accordance with IC 13-18-20.

Effective Date: June 1, 2012.

Expiration Date: May 31, 2017.

In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and application forms as are required by the Indiana Department of Environmental Management. The application shall be submitted to IDEM at least 180 days prior to the expiration date of this permit, unless a later date is allowed by the Commissioner in accordance with 327 IAC 5-3-2 and Part II.A.4 of this permit.

Issued on May 31, 2012, for the Indiana Department of Environmental Management.

Paul Higginbotham, Chief
Permits Branch
Office of Water Quality

TREATMENT FACILITY DESCRIPTION

The permittee currently operates a Class I, 0.0667 MGD treatment facility consisting of two parallel extended aeration plants (a 0.05 MGD plant and a 0.0167 MGD plant) with two (2) polishing ponds, secondary clarification, effluent chlorination, and flow metering. The effluent flow from the two treatment plants was designed to recombine before entering the first polishing pond. The 0.0167 MGD plant is not currently functional. Not utilizing the 0.0167 MGD plant is considered a bypass of treatment and is subject to Part II.B.2 of this permit.

The collection system is comprised of 100% separate sanitary sewers by design with no overflow points.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee shall take samples and measurements at a location representative of each discharge to determine whether the effluent limitations have been met. Refer to Part I.B of this permit for additional monitoring and reporting requirements.

1. Beginning on the effective date of this permit, the permittee is authorized to discharge from Outfall 001, which is located at Latitude: 39° 37' 55.92" N, Longitude: 85° 10' 1.2" W. The discharge is subject to the following requirements:

TABLE 1

	Quantity or Loading			**Quality or Concentration**			**Monitoring Requirements**	
Parameter	Monthly Average	Weekly Average	Units	Monthly Average	Weekly Average	Units	Measurement Frequency	Sample Type
Flow [1]	Report	----	MGD	----	----	----	5 X Weekly	24-Hr. Total
$CBOD_5$								
Summer [2]	11.1	16.7	lbs/day	20	30	mg/l	Weekly	24-Hr. Composite
Winter [3]	13.9	22.3	lbs/day	25	40	mg/l	Weekly	24-Hr. Composite
TSS								
Summer [2]	13.4	20.0	lbs/day	24	36	mg/l	Weekly	24-Hr. Composite
Winter [3]	16.7	25.1	lbs/day	30	45	mg/l	Weekly	24-Hr. Composite
Ammonia-nitrogen								
Summer [2]	0.8	1.2	lbs/day	1.5	2.2	mg/l	Weekly	24-Hr. Composite
Winter [3]	1.2	1.8	lbs/day	2.1	3.2	mg/l	Weekly	24-Hr. Composite

TABLE 2

	Quality or Concentration				Monitoring Requirements	
Parameter	Daily Minimum	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
pH [4]	6.0	----	9.0	s.u.	2 X Weekly	Grab
Dissolved Oxygen [5]						
Summer [2]	6.0	----	----	mg/l	2 X Weekly	2 Grabs/24-Hrs.
Winter [3]	5.0	----	----	mg/l	2 X Weekly	2 Grabs/24-Hrs.
Total Residual Chlorine [6]						
Contact Tank [7]	0.5	----	Report	mg/l	2 X Weekly	Grab
Final Effluent [8]	----	0.01	0.02	mg/l	2 X Weekly	Grab
E. coli [9]	----	125	235	cfu/100 ml	Weekly	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] Summer limitations apply from May 1 through November 30 of each year.

[3] Winter limitations apply from December 1 through April 30 of each year.

[4] 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 individual minimum and the individual maximum pH value of any sample during the month on the Discharge Monitoring Report forms.

[5] The daily minimum concentration of dissolved oxygen in the effluent shall be reported as the arithmetic mean determined by summation of the two (2) daily grab sample results divided by the number of daily grab samples. These samples are to be collected over equal time intervals.

[6] The effluent shall be disinfected on a continuous basis such that violations of the applicable bacteriological limitations (*E. coli*) 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.

[7] The chlorine residual shall be maintained at a concentration not less than 0.5 mg/l as measured at the effluent end of the chlorine contact tank for the term of the permit. The daily maximum chlorine residual value at the chlorine contact tank shall also be reported.

Wastewater Construction Permit Fees

A. The applicants listed below must remit with each application a fee of fifty dollars (*$50). These applications must be signed by an official of the entity (*check all that apply*).

☐	County, Municipality, or Township which is defined as a unit under IC 36-1-2-23	
☐	A Nonprofit Organization	
☐	A Conservancy District	
☐	A School Corporation that operates a sewage treatment facility	
☐	A Regional Water or Sewage District	

*Only pay $50 for a new wastewater treatment plant or expansion of an existing facility.

B. All other applications will pay the following revised fees per project type: Waived per Dale Schnaith

New Wastewater Treatment Plant (Except industrial)		
☐	A. Up to 500,000 gallons per day	$1,250.00
☐	B. Greater than 500,000 per day	$2,500.00
New Industrial Wastewater Treatment Plant (Including pretreatment)		
☐	A. Up to 500,000 per day for:	
☐	1. Biological or chemical treatment	$1,250.00
☐	2. Physical Treatment	$250.00
☐	B. Greater than 500,000 gallons per day:	
☐	1. Biological or chemical	$2,500.00
☐	2. Physical Treatment	$250.00
Wastewater Treatment Plant Expansion:		
☐	A. Up to fifty percent (50%) design capacity:	
☐	1. Greater than 500,000 per day	$2,500.00
☐	2. Up to 500,000 per day	$625.00
☐	B. Greater than fifty percent (50%) design capacity	
☐	1. Greater than 500,000 gallons per day	$2,500.00
☐	2. Up to 500,000 gallons per day	$1,250.00

Checks should be made payable to the **Indiana Department of Environmental Management**. Fees shall not be refundable once staff review and processing of the Permit Application has commenced.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

January 23, 2013

Mr. Matthew Sherck, President
Pleasantview Utilities, Inc.
3812 W. Galaxy Drive
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: Pleasantview Utilities, Inc.
Project No. PS-1419
Connersville, Indiana
Fayette County

Your e-mail dated January 11, 2013, requested that this project be withdrawn from our construction permitting process. After Mr. Don Worley contacted you on January 15, 2013, you indicated that the submitted application forms, plans and specifications should be mailed to Ms. Ethel L. Morgan with Hometown Engineering, LLC. Be advised that this project has been withdrawn from our construction permitting process as requested.

If another application submittal is made within a reasonable amount of time after this project is withdrawn, the submitted review fee of $625.00 (six hundred and twenty five dollars) that was submitted with the original application submittal, can be applied to the new application submittal.

If you have any questions regarding this action, please contact Don Worley at 317/232-5579 or by e-mail at dworley@idem.in.gov.

Sincerely,

Dale Schnaith, Chief
Facility Construction and
Engineering Support Section
Office of Water Quality

Enclosures

cc: Ms. Ethel L. Morgan, P.E., Hometown Engineering, LLC

Wastewater Treatment Plant Design Summary

1. General

A. Applicant name: Pleasantview Utilities, Inc.

B. Project Name: Pleasantview Utilitieis WWTP Modifications

C. Location: 3812 W. Galaxy Drive, Connersville, IN 47331

D. Engineer (consultant): Hometown Engineering, LLC

E. NPDES permit number: IN0044776

1. Date of final permit issuance *(month, day, year)*: 5/31/2012

2. Expiration date *(month, day, year)*: 5/31/2017

F. Remarks

1. Description of present situation: .060 MGD extended aeration package plant with two polishing ponds, chlorination in advance of the ponds, and effluent flow meter in advance of the ponds. An equalization basin was converted to aeration and has since been abandoned. The digester and surge tank in the packaged plant have been converted to aeration capacity.

2. Description of proposed facility(s): Replacement of the abandoned equalization tank with a new equalization tank, conversion of the surge tank to additional digester capacity, returning the digester to its original service, relocation of the flow meter and installation of a Palmer Bowlus flume structure, installation of new chlorination and dechlorination facilities, and relocation of the final discharge point.

3. Inspection during construction to be provided by: Owner

G. Estimated project cost

1. Source of funding (Revenue bond, state grant, SRF, etc.):

2. Total cost: $110,000

H. Certification seal and signature of engineer and date:

ETHEL L. MORGAN REGISTERED No. PE 10012 STATE OF INDIANA

Printed name of engineer:
Ethel L. Morgan

Signature of engineer:
Ethel L. Morgan

Date signed *(month, day, year)*:
8/7/13

recd 8/9/13

2. Design Data

A. Current population: 176 homes, 19 apartments; 600 people estimated

B. Design year and population: 2030, No Change

C. Design population and equivalent P.E.: 600

D. Design flow:

1. Domestic: 60,000

2. Industrial/commercial:

3. infiltration/inflow: Included in 100 gpcd

E. Average design peak flow: 90,000 gpd

F. Maximum plant flow capacity: 90,000 gpd (with equalization facilities)

G. Design waste strength

1. CBOD: 204 mg/l

2. TSS: 248 mg/l

3. NH_3-N: 36 mg/l

2. Design Data *(continued)*

2. Design Data *(continued)*

4. P: NA
5. Other: NA

H. NPDES permit limitation on effluent quality

1. CBOD: 20 summer; 25 winter
2. TSS: 24 summer; 30 winter
3. NH_3-N: 1.5 summer; 2.1 winter
4. P: NA
5. E-coli: 125/235
6. Chlorine Residual: .5 contact tank; .01 final effluent
7. pH: 6 to 9
8. D.O.: 6 summer; 5 winter

I. Receiving stream

1. Name: Unnamed tributary to Williams Creek
2. Tributary to:
3. Stream uses: Full body contact recreational uses
4. 7-day, 1-in-10 year low flow: 0.0 cfs

3. Treatment units *(Fill out the ones that apply and if needed create a new entry that follows the format.)*

A. Plant site lift station – None

1. Location:
2. Type of pump:
3. Number of pumps:
4. Constant or variable speed:
5. Capacity of pumps:
6. RPM and TDH:
7. Volume of the wet well:
8. Detention time in the wet well:
9. A gate valve and a check valve in the discharge line:
10. A gate valve on suction line:
11. Ventilation:
12. Standby power:
13. Alarm:
14. Breakwater tank:
15. Bypass overflow:

*B. Flow equalization – Proposed Conversion of existing aeration tank with a new tank

1. Number and size of units: 1; 36' X 12' X 9.5' SWD; 30,000 gal.
2. Method of flow diversion to unit: Flow Splitting/Control Structure
3. Air and mixing provided: yes
4. Method and control of flow return: Float control and pumping to aeration tanks
5. Description of unit operation: Excess gravity flows will be diverted to the equalization basin by the flow splitter/control box. Flows will be pumped to the splitter control box based on sensor levels in the EQ basin, or by gravity emergency overflow to the aeration tank.
6. Lagoon sealing: NA
7. Method of sludge removal: Manual pumping and sludge hauling

*C. Flow meters – Existing – To be relocated

1. Type: Ultrasonic
2. Location: Effluent
3. Indicating, recording and totalizing: Yes

D. Grit chamber - NA

1. Type of grit chamber:
2. Number of units:
3. Size of unit:
4. Method of velocity (aeration) control:
5. Velocity (aeration) in the chamber:
6. Drain provided:

3. Treatment units *(continued)*

7. Flow restrictions:
8. Facilities to isolate:

E. Comminutors - NA

1. Type:
2. Location:
3. Maximum capacity:
4. By-pass (overflow) bar screen:

F. Screens - Proposed

1. Type: Coarse Bar Screen
2. Number and capacity: 1
3. Bar spacing and slope: 1", 45 degrees
4. Method of cleaning: Manual
5. Disposal of screenings: Landfill

G. Primary settling - NA

1. Type of clarifier:
2. Number and size of units:
3. Surface settling rate (gpd/sf)
   a. At the design flow:
   b. At the influent pumping rate:
   c. At the equalized flow rate:
4. Detention time (hrs):
5. Type of sludge removal mechanism
6. Weir overflow rate:
7. Disposition of scum:
8. Location of overflow weir:
9. Facilities to isolate:

H. Activated sludge – Existing – 2nd Blower Proposed

1. Type of activated sludge process: Extended Aeration
2. Number and size of units: 2; 36' X 12' X 9.67' SWD
3. Detention time (hrs): 24 hours
4. Organic loading (lb BOD/1000 cf): 12 lbs/1000 cf
5. Type of aeration equipment: coarse bubble diffusers
*6. Type and size of blowers: Two Rotary Lobe , 12 hp; one existing and one proposed
7. Air required (itemize, cfm): aeration – 145 cfm; digester - 60 cfm; EQ Basin – 38 cfm; Airlift – 20 cfm; post air – 1 cfm
   Total – 265 cfm
8. Provisions of speed adjustment: Yes
9. Air provided: 332 cfm
10. Ventilation in the blower room: NA
11. Number and capacity of return sludge pump: 2; 22 to 65 gpm
12. Method of return sludge rate control: Weir
13. Return sludge rate as % of design flow: 50 to 150%
14. Provisions for return rate metering: Visual measurement
15. Location of return sludge discharge: Aeration tanks
16. Facilities to isolate units: Yes
17. Facilities for flow split control: Yes

I. Oxidation ditch NA

1. Number and size of units:
2. detention time (hrs):
3. Organic loading (lb BOD/1,000 cf):
4. Type and efficiency of aeration equipment (lb 0/HP-hr):
5. Oxygen required:
6. Oxygen provided:
7. Flow velocity in ditch:
8. Number and capacity of return sludge pump:

3. Treatment units *(continued)*

10. Freeboard:
11. Soil boring data and permeability date:
12. Slope of embankment and top width:
13. Fence:
14. Detention time:
15. Stream gage:
16. Lagoon seal:
17. Facilities for multi-level lagoon discharge:
18. Scum control:

N. Secondary clarifier - Existing

1. Type of clarifiers: Rectangular
2. Number and size of units: 2 – 12' X 12' X 12' SWD
3. Surface settling rate (gpd/sf):
   a. at the design flow: 418 gpd/sf
   b. at the influent pumping rate: 418 gpd/sf
   c. at the equalized flow rate: 418 gpd/sf
4. Detention time (hrs): 5 hours each unit; 10 hours through both units
5. Type of sludge removal mechanism: sump and airlift
6. Weir overflow rate: 10,000 gpd/sf each unit; 5,000 gpd/sf both units operating
7. Disposal of scum: digester
8. Facilities for unit isolation: yes
9. Facilities for flow split control: yes

O. Constructed wetland NA

1. Design flow:
2. Type of wetland:
3. Type of solids removal/pretreatment:
4. Number and size of cells:
5. Number of zones per cell:
6. Surface area of each zone:
7. Organic loading:
8. Liner:
9. Detention time:
10. Type of media:
11. Media depth:
12. Media void rate:
13. Operating capacity:
14. Length/width ratio:
15. Type of plants:
16. Expected % of BOD and NH3-N removal:
17. Recirculation:
18. Dosing tank information:
    a. Dimensions:
    b. Capacity:
    c. Pumps:

P. Rapid sand filtration NA

1. Number and size of filters:
2. Filtration rate:
   a. at peak flow rate:
   b. at average flow rate:
3. Type, depth, and gram size of filter media:
4. Backwash rate:
5. Air scour:
6. Capability to chlorinate ahead of the filter:
7. Backwash pumps (number and capacity):

3. Treatment units *(continued)*

8. Method of rate control:
9. source of capacity of backwash water:
10. Holding capacity or dirty water tank:
11. Facilities for unit isolation:

Q. Micro-strainers NA

1. Number and size of strainers:
2. Screen material:
3. Filtration rate:
4. Backwash rate:
5. Number and capacity of backwash pumps:
6. Facilities for unit isolation:
7. Slime control provisions:

R. Two-day lagoon NA

1. Number and size of lagoon cells:
2. Detention time (days):
3. Type of chemical:
4. Location of chemical injection:
5. Number and size of chemical storage tank:
6. Rate adjustment capabilities:
7. Capacity of chemical storage tank:
8. Capacity of spill storage tank:
9. Expected daily use of chemical (dosage and solution):
10. Lagoon seal:
11. Parallel or series operation:
12. Sludge removal facilities:
13. Method of draining:
14. Multi-level discharge:
15. Scum control:

*S. Post-aeration – Diffuser Proposed

1. Type of aeration: Blowers and Pipe Diffuser
2. Number of units: 1
3. Size of units: 12 in, 332 cfm
4. Aeration provided: 1 cfm
5. Expected effluent DO: 6 mg/l

T. Nitrification system - Existing

1. Type of nitrification system: Extended Aeration
2. Ammonia loading: 36 mg/l
3. Additional oxygen demand: 69 cfm
4. Air supply system: Rotary Lobe Blowers
5. Hydraulic detention time: 25 hours
6. Mean cell residence time (days): 18 days

U. Phosphorus removal facilities NA

1. Type of chemical to be used:
2. Location of chemical injection:
3. Number and size of chemical feed pumps:
4. Size of chemical; storage tank:
5. Capacity of spill storage space:
6. Chemical dosage:
7. Daily chemical consumption expected:
8. Rapid mix tank:
9. Slow mixing equipment:
10. Other facilities – describe:

3. Treatment units *(continued)*

*V. Disinfection – Modifications proposed
1. Type of disinfectant used: Chlorine
2. Size of contact tank: - None existing; 12' diameter proposed
3. Contact time: 59 minutes @ ADF; 18 minutes at peak flow
4. Type of disinfectant feeders: solid
5. Capacity of the feeders: 200,000 gpd
6. Disinfectant dosage: 8 mg/l
7. Scum control baffle: no
8. Source of the disinfectant feed water: NA
9. Breakwater tank for the feed water: NA
10. Bypass: No
11. Drain for tank: No
12. Ventilation in chlorine room: NA
13. Safety equipment: NA

*W. De-chlorination - Proposed
1. Chemical used: Sodium Sulfite
2. Type of feeders: Solid
3. Capacity of feeders: 200,000 gpd
4. Dosage: 1.78 mg/l per mg CL2
5. Type of diffuser: NA
6. Diffuser location: NA
7. Equipment location: Downstream of chlorine contact chamber
8. Ventilation provided: NA
9. Safety equipment: NA

X. UV disinfection NA
1. Type:
2. Location:
3. Size of channel:
4. Contact time:
5. Dosage:
6. Bypass:
7. Safety equipment:
8. Cleaning equipment:
9. Intensity Monitoring:

Y. Sludge thickening NA
1. Number and size of thickeners:
2. Type of sludge thickeners:
3. Hydraulic loading:
4. Solids loading:
5. Provisions to chlorinate:

Z. Anaerobic digesters NA
1. Number and size of units:
2. Total volume:
3. Organic loading:
4. Hydraulic detention time:
5. Volume per capita:
6. Type of mixing:
7. Heating: ☐ internal or ☐ external

AA. Aerobic digesters – Existing and Conversion of Existing Surge Control
1. Number and size of units: Existing Digester – 13' X 9' X 9.5' SWD; Existing Surge Tank – 11' X 9' X 9.5' SWD; Total capacity – 15,000 gallons
2. Detention time: 54 days at 2%
3. Organic loading: 30 lbs/day
4. Air supply: 60 cfm

3. Treatment units *(continued)*
5. Decanting method: Gravity
BB. Wet-oxidation NA
1. Number of units:
2. Type of heat treatment:
3. Temperature and pressure to be used:
4. Capacity of the unit:
5. Daily sludge production for heat treatment:
CC. Sludge drying beds NA
1. Number and size of drying beds:
2. Filter area per capita:
3. Under-drain system:
4. Discharge location of filtrate:
5. Accessibility of dry sludge removal equipment:
DD. Mechanical dewatering NA
1. Type of dewatering units:
2. Number and size of dewatering units:
3. Capacity of dewatering units:
4. Daily solids production for dewatering:
5. Type of chemicals to be used:
EE. Sludge disposal
1. Ultimate disposal method of sludge: Municipal WWTP
2. Expected solids content of sludge (by the principal method of disposal): 2%
3. Location of disposal site: TBD
4. Ownership of the disposal site: TBD
5. Availability of sludge transport equipment: Contracted
4. Sewer Effluent Pipe
A. Lift Stations - NA
1. Location:
2. Type of pump:
3. Number of pumps:
4. Constant or variable speed:
5. Capacity of pumps:
6. RPM and TDH:
7. Volume of the wet well:
8. Detention time in the wet well:
9. A gate valve and a check valve in the discharge line:
10. A gate valve on the suction line:
11. Ventilation:
12. Standby power:
13. Alarm:
14. Breakwater tanks:
15. Bypass or overflow:
16. Type of force main:
17. Diameter and length of force main:
B. Sewer
1. Type of sewer material: PVC
2. Diameter and length of sewer (indicate length for each size): 6", 8 LF
3. Stream, highway, and railroad crossing: No
4. Separation of combined sewer or new sewer: New Sewer
5. Number of manholes: 0
6. Water main protection: Yes

4. Sewer Collection System *(continued)*
C. Individual grinder pumps - NA
1. Location:
2. Number of pumps:
3. Capacity of pumps:
4. RPM and TDH:
5. Volume of the wet well:
6. A gate valve and a check valve in the discharge line:
7. Ventilation:
8. Alarm:
5. Miscellaneous
A. Laboratory equipment: Contracted
B. Safety equipment: Yes
C. Plant site fence: Yes
D. Handrail for the tanks: No
E. Units, unit operation, and plant bypasses: Yes
F. Flood elevation (10, 25, or 100 year flood): Zone C
G. Provisions to maintain the same degree of treatment during construction: Yes
H. Standby power: No
I. Site inspection: By Owner
J. Statement in the specifications as to the protection against any adverse environmental effect (e.g., dust, noise, soil erosion) during construction: Yes
K. Hoists for removing heavy equipment: No
L. Adequate sampling facilities: Yes
M. Hydraulic gradient: Yes
N. Septage receiving facilities No
1. Screening:
2. Location of discharge:

PART OF STATE FORM 53160 (R2 / 9-08)

IDENTIFICATION OF POTENTIALLY AFFECTED PERSONS

Please list any and all persons whom you have reason to believe have a substantial or proprietary interest in this matter, or could otherwise be considered to be potentially affected under law. Failure to notify a person who is later determined to be potentially affected could result in voiding our decision on procedural grounds. To ensure conformance with Administrative Orders and Procedures Act (AOPA) and to avoid reversal of a decision, please list all such parties. The letter on the opposite side of this form will further explain the requirements under the AOPA. Attach additional names and addresses on a separate sheet of paper, as needed.

Name	
Anthony Borders	
Address (*number and street*)	
3790 W. Galaxy Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Janet K. Benz	
Address (*number and street*)	
3331 W. Starlight Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Norma L. Callihan	
Address (*number and street*)	
3770 W. Galaxy Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Arthur J. Reisert	
Address (*number and street*)	
855 S. SUNRISE LANE	
City	
Connersville	
State	ZIP
IN	47331

Name	
Robert and Linda Thumb	
Address (*number and street*)	
3826 W. Galaxy Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
David and Wanda Earlywine	
Address (*number and street*)	
841 S. SUNRISE LANE	
City	
Connersville	
State	ZIP
IN	4733[illegible]

Name	
Brian L. Guerin	
Address (*number and street*)	
3313 W. Starlight Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Theresa L. Seale	
Address (*number and street*)	
839 S. SUNRISE LANE	
City	
Connersville	
State	ZIP
IN	47331

CERTIFICATION

rec'd 6/3/13

I certify that to the best of my knowledge I have listed all potentially affected parties, as defined by IC 4-21.5-3-4.

Proposed facility name	Printed Name
Pleasantview Utilities	Matthew Sherck
City	Signature
Connersville	Matt Sh
County	Date (*month, day, year*)
Fayette	5/30/2013

CLOW

PROPOSAL

CLOW CORPORATION
WASTE TREATMENT DIVISION
56 INDUSTRIAL ROAD • P.O. BOX 324
FLORENCE, KENTUCKY 41042
TELEPHONE (606) 283-2121
317-846-4890

10505 NORTH COLLEGE AVE.
INDIANAPOLIS, IN 46280

Proposal Number 74-242-DM

Page 1 of 3 Pages

Date: September 3, 1974

TO: Mr. Maynard Taylor

R. R. #6

Connersville, Indiana 47331

Project Pleasantview Subdivision

Engineer or Architect Cecil A. Wilson, P.E.

We are pleased to offer the following for your consideration.

One (1) Clow Model S-600-610-10 60,000 GPD extended aeration treatment plant as described on Page 2.

Dimensions: 24' wide x 11' deep x 58' long
Four (4) Sections - 17,000 lbs. each

Capacities:

Aeration Tank -	60,000 gallon
Clarifier -	10,000 gallon
Sludge Tank -	8,000 gallon
Surge Tank -	7,000 gallon

NOTE:

For inclusion of a flow meter mounted in a V-notch weir chamber at the plant effluent ADD $1,975.00 to the price on Page 3. This price includes weir chamber with Leopold & Stevens Model 61R flow meter with recorder chart.

For deletion of second blower DEDUCT $2,740.00 from price on Page 3.

6/3/13

1 Aer-O-Flo Model S-600-610-10, 60,000 G.P.D. domestic sewage of 250 PPM 5 day B.O.D. prefabricated steel, package sewage treatment plant with all necessary tanks, weirs, baffles, internal piping, and the following items:

SCREENING EQUIPMENT

No Model _____ Comminutor _____ H.P., _____ Volts, _____ Phase with controls and
No Ft. Shaft Extension.
No Submerged Bar Screen.
1 ~~Combination Comminutor and Bar Screen By-Pass Chamber with~~ Two Way Flow Splitter.

AIR SUPPLY AND CONTROL EQUIPMENT

2 Blower(s) 2 Standard Drip-proof Motor(s) 10 H.P., 230 Volts, 3 Phase
2 Weatherproof Motor-Blower Housing(s) with locking panels.
2 Prewired Control Panel(s), complete with magnetic starters, circuit breakers and program timers.

FROTH CONTROL EQUIPMENT

No Submersible Foam Control Pump _____ H.P., _____ Volts, _____ Phase, with Spray Nozzles.

CHLORINATION EQUIPMENT

No _____ Gallon Chlorine Contact Tank. Steel, _____
No Chlorinator _____ Mfr. and Model _____ with Model _____
Chlorinator Housing with _____ controls.

SLUDGE HOLDING EQUIPMENT

1 8,000 Gallon Holding Tank, aerated, integral Draw-Off Valve(s) & Line(s) Only.

CORROSION PROTECTION

8 17 lb. Magnesium Anodes.
6 Tank Painting black Aer-O-Flo Standard ~~Enamel Finish with Sandblast~~ _____ Special.

MISCELLANEOUS EQUIPMENT

1 Set(s) Aer-O-Deck Grating service
No Feet of Wall Extension
1 7,000 gallon surge tank with duplex pumps, CC-10 control panel and recirculation piping.
1 Nutrient removal system with pump and housing 45 EP pump with CH-10 housing.

NET PRICE - - - - - - - - $ See Page 3

ITEMS NOT INCLUDED IN PROPOSAL:

Excavation, Concrete Pad, Removing Tank from Truck, Setting Tank on Pad, External Piping, Electric to Control Panel, Hook Up Prewired Components, Sewerage Lines, Backfilling, Water to Fill Tank, Finish Grading and Seeding, Fencing or Field Erection.

If jobsite delivery is required it is Buyers responsibility to provide an accessible road to jobsite.

AER-O-FLO

Model "S" Data Sheet Prefab Steel

MODEL	DRAWING No.	DESIGN FLOW	AERATION VOL.	CLARIFIER VOL.	CHLORINE CONTACT TANK VOL. GALLONS	BLOWER CFM	BLOWER HP	DIMENSIONS A	B	C	D	E	F	G	H
**S-210-55-5	S-602 S-602-C	21,000	21,000	3,500	443	105	5	25'0"	12'0"	6'0"	9'6"	5'3"	4'3"	2'6"	9'8"
*S-220-55-5B	S-604 S-604-C	22,000	22,000	3,667	466	110	5	26'6"	12'0"	7'0"	9'6"	4'5"	5'1"	2'7"	9'8"
*S-230-55-5B	"	23,000	23,000	3,840	478	115	5	27'6"	12'0"	7'0"	9'6"	4'5"	5'1"	2'8"	9'8"
*S-240-55-5B	"	24,000	24,000	4,000	500	120	5	28'6"	12'0"	7'6"	9'6"	4'0"	5'6"	2'10"	9'8"
*S-250-55-5B	"	25,000	25,000	4,170	519	125	5	29'3"	12'0"	7'6"	9'9"	4'3"	5'6"	2'11"	9'11"
*S-260-55-5	S-616	26,000	26,000	4,340	541	130	5	31'6"	12'0"	7'6"	9'6"	3'11"	5'7"		9'8"
*S-270-55-5	"	27,000	27,000	4,500	563	135	5	32'6"	12'0"	7'8"	9'6"	3'9"	5'9"		9'8"
*S-280-55-5	"	28,000	28,000	4,670	582	140	5	34'0"	12'0"	8'3"	9'6"	3'4"	6'2"		9'8"
*S-290-55-5	"	29,000	29,000	4,840	607	145	5	35'0"	12'0"	8'6"	9'6"	3'1"	6'5"		9'8"
*S-300-55-5	"	30,000	30,000	5,000	624	150	5	36'0"	12'0"	8'9"	9'6"	2'11"	6'7"		9'8"
*†S-350-67-7½	S-618	35,000	35,000	5,833	728	175	7½	41'10"	12'0"	10'0"	9'6"	2'1"	7'8"		9'8"
*†S-400-67-7½	"	40,000	40,000	6,667	835	200	7½	47'11"	12'0"	10'0"	9'6"	2'8"	7'7"		9'8"
*†S-450-67-10	"	45,000	45,000	7,500	940	225	10	53'10"	12'0"	10'0"	9'6"	3'2"	7'7"		9'8"
*†S-500-67-10	"	50,000	50,000	8,333	1045	250	10	60'1"	12'0"	10'0"	9'6"	3'9"	7'8"		9'8"
*†S-550-610-10	S-622	55,000	55,000	9,190	1175	275	10	34'0"	12'0"	12'0"	9'6"	2'0"	9'5"	47'0"	9'8"
*†S-600-610-10	"	60,000	60,000	10,000	1250	300	10	36'0"	12'0"	12'0"	9'6"	2'6"	9'5"	49'0"	9'8"
*†S-700-710-15	"	70,000	70,000	11,690	1460	350	15	42'0"	12'0"	12'0"	9'6"	3'2"	9'5"	55'0"	9'8"
*†S-750-710-15	"	75,000	75,000	12,500	1565	375	15	45'0"	12'0"	12'0"	9'6"	3'7"	9'5"	58'0"	9'8"
*†S-800-710-15	"	80,000	80,000	13,545	1665	400	15	48'0"	12'0"	12'0"	9'6"	4'1"	9'5"	61'0"	9'8"
*†S-850-710-15	"	85,000	85,000	14,190	1790	425	15	51'0"	12'0"	12'0"	9'6"	4'4"	9'5"	64'0"	9'8"
*†S-900-710-15		90,000	90,000	15,000	1875	450	15	54'0"	12'0"	12'0"	9'6"	4'9"	9'5"	67'0"	9'8"
*†S-950-710-15	"	95,000	95,000	15,850	1990	475	15	57'0"	12'0"	12'0"	9'6"	5'3"	9'5"	70'0"	9'8"
*†S-1000-710-15	"	100,000	100,000	16,700	2085	500	15	60'0"	12'0"	12'0"	9'6"	5'6"	9'5"	73'0"	9'8"

C - Chlorine Contact Tank Attached 30 Min. Retention *Dual Hopper Clarifier I = 2C J = 2B + 2'0"

†Clarifier to be Removable, Lower Portion of Hopper to be Bolted, Welded, & Grouted in Place in Field.

FORM 110-A

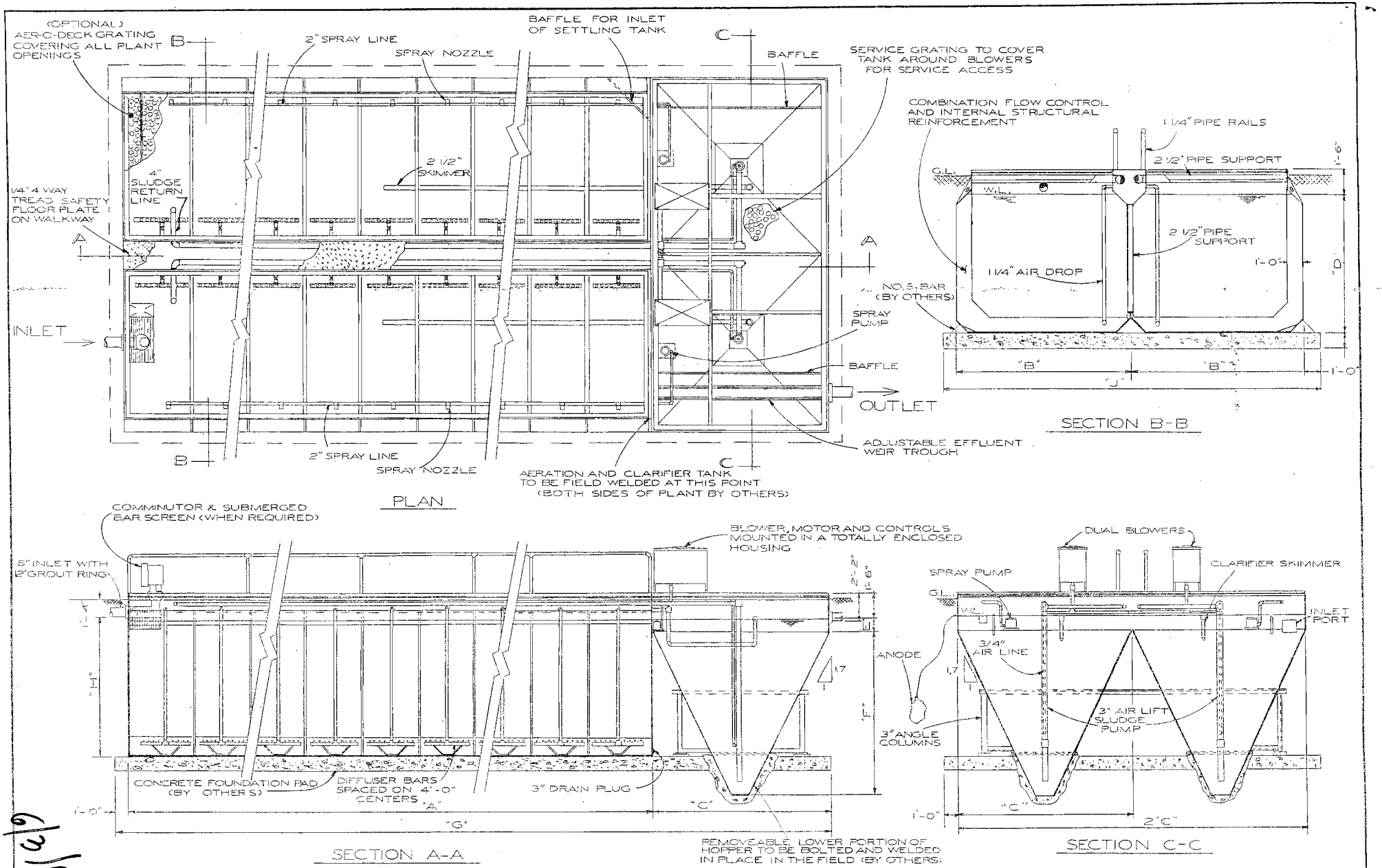
AER-O-FLO

Specification Data Sheet for S Models

Model	Daily Flow G.P.D.	HP	Blower CFM	Blower Size	Froth Control Pump HP	Froth Control Pump GPM	Number of Spray Nozzles	Blower Cabinet Model	Number Diffuser Drops	Recommended No. Magnesium Anodes	Number of Sections Tank Shipped In	Basic Plant Approx. Weight
S- 220- 55-5	22,000	5	110	AF 55	½	30	12	CS- 55	6	4	1	20,616 "
S- 230- 55-5	23,000	5	115	AF 55	½	30	12	CS- 55	6	4	1	21,453 "
S- 240- 55-5	24,000	5	120	AF 55	½	30	12	CS- 55	6	4	1	22,291 "
S- 250- 55-5	25,000	5	125	AF 55	½	30	12	CS- 55	6	4	1	23,130 "
S- 260- 55-5	26,000	5	130	AF 55	½	30	14	CS- 55	7	4	2	24,767 "
S- 270- 55-5	27,000	5	135	AF 55	½	30	16	CS- 55	8	4	2	26,404 "
S- 280- 55-5	28,000	5	140	AF 55	½	30	16	CS- 55	8	4	2	28,041 "
S- 290- 55-5	29,000	5	145	AF 55	½	30	16	CS- 55	8	4	2	29,169 "
S- 300- 55-5	30,000	5	150	AF 55	½	30	18	CS- 55	9	6	2	30,298 "
S- 350- 67-7½	35,000	7½	175	AF 67	½	50	20	CS-610	10	6	2	34,284 "
S- 400- 67-7½	40,000	7½	200	AF 67	½	50	22	CS-610	11	6	2	37,256 "
S- 450- 67-10	45,000	10	225	AF 67	½	50	26	CS-610	13	6	2	40,398 "
S- 500- 67-10	50,000	10	250	AF 67	½	50	30	CS-610	15	6	3	43,440 "
S- 550-610-10	55,000	10	275	AF610	½	50	32	CS-610	16	6	3	51,487 "
S- 600-610-10	60,000	10	300	AF610	½	50	32	CS-610	16	6	3	56,085 "
S- 700-710-15	70,000	15	350	AF710	½	50	36	CS-710	18	6	4	62,363 "
S- 750-710-15	75,000	15	375	AF710	½	50	40	CS-710	20	8	4	71,640 "
S- 800-710-15	80,000	15	400	AF710	½	50	48	CS-710	24	8	4	74,512 "
S- 850-710-15	85,000	15	425	AF710	½	50	48	CS-710	24	8	5	77,654 "
S- 900-710-15	90,000	15	450	AF710	½	50	52	CS-710	26	8	5	80,696 "
S- 950-710-15	95,000	15	475	AF710	½	50	56	CS-710	28	8	5	83,838 "
S-1000-710-15	100,000	15	500	AF710	½	50	56	CS-710	28	8	5	86,880 "

NOTES

1. All plants over 9,000 G.P.D. will have dual hoppers and dual sludge return pumps.
2. All plants over 25,000 G.P.D. will have dual skimmers.



MODEL NO.	DESIGN FLOW G.P.D.	AERATION VOL. GAL.	CLARIFIER VOL. GAL.	BLOWER CFM	BLOWER HP	DIMENSIONS A	B	C	D	E	F	G	H	J	K

AER-O-FLO CORPORATION
FLORENCE, KENTUCKY

SCALE: NONE	APPROVED BY:	DRAWN BY:
DATE: 11/18/68	R. Smith	REVISED

EXTENDED AERATION DIGESTION
SEWAGE TREATMENT SYSTEM

DRAWER NO.	CODE	DRAWING NUMBER
		S-622

PLEASANTVIEW UTILITIES WWTP
EXISTING PLANT
7/2/13

Houses	176	310 gpd	54,560 gpd	
Apartments (2-bedroom)	19	300 gpd	5,700 gpd	
Total			60,260 gpd	42 gpm

ADF		60,260	gpd
BOD	Average	102	lbs/day
BOD	Peak	163	lbs/day
TSS	Average	120	lbs/day

AERATION - dual tank system
Clow Model S-600-610-10 60,000 GPD extended aeration treatment plant

Each Tank	Length	Width	Depth	SWD	Capacity		Capacity	
	36	12	11	9.67	4,177	cf	31,247	gal
Total Aeration Tank Capacity							62,495	gal

Note Manufacturer info 60,000 gal

Loading	(max 15lbs/day/1000 cf)	12	lbs		
Design Loading		125	lbs		
Oxygen Requirement	(1.5 lbs O2/lb peak BOD)	245	lbs		
Oxygen Requirement	(2050 cf/lb BOD)	232	cfm	aeration only	
Return Sludge	(50 - 150% ADF)	19	gpm	to	57 gpm

CALRIFICATION - Two tanks

Tank	Length	Width	Depth	SWD	Capacity		Capacity	
	12	6	14	12	864	cf	6,463	gal
Total Clarification							12,925	gal
Surface Overflow Rate	(1000 gpd/sf)				144	sf	144,000	gpd
Solids Loading Rate	(35 lbs/day/sf)				144	sf	5,040	lbs/day

Note Manufacturer info 60,000 gal

Sludge Holding	8,000 gal
Surge Tank	7,000 gal

recd 8/9/13

Pleasantview Utilities
PROPOSED PLANT
7/2/13

Flow		0.06 gpd						
ADF			60,000 gpd					
BOD	Average		102 lbs/day					
BOD	Peak		163 lbs/day					
TSS			120 lbs/day					
NH3	Average		18 lbs/day					
Plant Rated			60,000 gpd					
Peak Flow			90,000 gpd					

EQUALIZATION
Proposed Tank

Tank	Length	Width	Depth	SWD	Capacity		Capacity	
	36	12	11.5	10	4,320	cf	32,314	gal

AERATION

Aeration	(1.25 cfm/1000 gal)						40	cfm
Tank 1	36	12	11	9.67	4,177	cf	31,247	gal
Tank 2	36	12	11	9.67	4,177	cf	31,247	gal
Total Capacity					**8,355**	cf	**62,495**	gal;

Detention Time			**25**	hours
Actual Design Loading		12	lbs BOD	
Maximum Design Loading	(max 15lbs/day/1000 cf)	125	lbs	
Oxygen Requirement	(1.5 lbs O2/lb peak BOD)	153	lbs	
		76	cfm	aeration only
Oxygen Requirement	(2050 cf/lb BOD)	145	cfm	aeration and nitrification
Return Sludge	(50 - 150% ADF)	21	gpm	to 63 gpm
Nitrification	(4.6 lbs/lb TKN)	83	lbs	
		41	cfm	nitrification only
Therefore Use Higher Aeration Requirement		**145**	**cfm**	

CLARIFICATION

	Length	Width	Depth	SWD	Capacity		Capacity	
Tank 1	12	12	14	12	1,728	cf	12,925	gal
Tank 2	12	12	14	12	1,728	cf	12,925	gal
Total Capacity					**3,456**	cf	**25,851**	gal

Surface Overflow Rate -total		288	sf	208 gpd at ADF
Surface Overflow Rate -total	(1000 gpd/sf)	288	sf	313 gpd at peak rate
Surface Overflow Rate -each		144	sf	625 gpd at peak rate
Solids Loading Rate	(35 lbs/day/sf)	288	sf	12.29 lbs/day/sf
Detention Time				10 hours adf
Weir Overflow Rate	(20,000 gpd/sf)	12	sf	5000 gpd/sf

Total Aeration Required

Treatment (including nitrification)	145	cfm
Digester	60	cfm
EQ Basin	38	cfm
Post Air	1	cfm
Airlift	20	cfm
Total	**265**	**cfm**

Air Supplied

New Blower - Roots Rotary Lobe 610AF	332	cfm	1080	rpm	6 psi	12 hp
Existing Blower - Roots Whispair 68U	149	cfm	1750	rpm	6 psi	7.5 hp

lbs O2/(0.075*.232)=cfd		1091.95	cfd	5000
O2 Transfer Rate = 8%		13649.4		62500
cfd/.08	cfd	9.47877	cfm	43.40278

SRT — solids in the system/solids leaving the system

solids in the system	1824	lbs
Solids Wasted	92	lbs
Soilids Leaving	10	lbs
SRT	18	days

8/9/13

Pleasantview Utilities
Chlorine Contact Tank
3/30/13

ADF	62,000	gpd
	43	gpm
Peak Flow	200,000	gpd
	139	gpm
Contact Time Required-	30	min at ADF
Contact Time Required-	15	min at peak flow
Tank size	1,292	gallons for ADF
	2,083	gallons for peak
Proposed Tank -12' MH, 3' deep	339	cf
	2,537	gallons
Contact time	59	minutes at ADF
Contact time	18	minutes at peak
Dosage Required	8	mg/l
Daily Consumption	4	lb/day
Dechlorination		
Sodium Sulfite Tablet		
Dosage Required	2	mg/l per mg/l CL2
Daily Consumption	7	lb/day

6/3/13

Post Air
9/6/12

Required DO - Summer	6	
Required DO - Winter	5	
Available DO - Summer	3	
Available DO - Winter	1.5	
Assume Available DO	0	
Assume O2 Transfer Rate	8	%
Flow Rate	62,000	gpd

Re-Aeration

Assume DO is zero

Need O2 at D0 Requirement	3.10248	lb O2
	17.830345	cfd
	222.87931	cfd
	0.1547773	cfm

6/2/12

Pleasantview Utilities
07/02/13

Design Flow	0.0600 mgd					
Average BOD	204 mg/l					
Average TSS	240 mg/l					
Design Flow	0.0600 mgd					
BOD eff	20 mg/l					
Ten States Digester Volume (3 cf/PE)	1,800 cf					
	13,464 gallons					
Theoretical production at .062 mgd						
WAS based on	50% reduction in aeration					
WAS	(flow)(8.34)[(BOD)-BODeff](.5) =		46.00	lbs/day		16788.5 lbs/yr
	at 2%		275.76	gpd		
	at 2.5%		220.60	gpd		
	at 3%		183.84	gpd		
	at 4%		137.88	gpd		
Volume per Capita (3 cf/PE Required)	3 cf/PE/Day		1860.00			13,913 gallons
Existing Digester	8,000 gal					
Existing Surge Tank	7,000 gal					
Total Capacity	15,000 gal		82 days @ 3%			54 days @2%
	2,005 cf					
Air Required (30 cfm/1000 cf)	60 cfm					
Existing Digester	13	9	9.5	1112 cf		8,314 gallons
Existing Surge Tank	11	9	9.5	898 cf		6,715 gallons
Total Capacity						15,029 gallons

2CC8
8/9/13

Pleasantview Utilities
TRANSFER PUMPS
June 24, 2013

ESTIMATED FLOWS

Proposed Service	Properties	Flow Rates	Flow	Flow	EDU
homes	176 at	310 gpd	54,560 gpd	37.89 gpm	176
apartments	19 at	300 gpd	5,700 gpd	3.96 gpm	18
Total Flow			60,260 gpd	42 gpm	194

Population Equivalent	583		
Peaking Factor	3.94		
Peak Flow	165	gpm	
Discharge Piping Size (v = 3fps)	5	inch	Calculated FM size
Wetwell Volume	30,000	gallons	
	4,011	cf	
Surge Tank	height = 10.50	feet	

OR to SEND BACK to EQ tank over weir

892.29'
892.29'

Influent Pipe Invert =	891.87	FM Invert =	~~891.17~~	891.99'
HWL=	892.50	High Point=	~~891.17~~	891.99'
Lead Pump on=	890.50	Ground Elevation=	892.00	
Lag Pump On=	892.00	LWL=	883.00	
Pump Off=	883.50	Bottom=	882.00	
		height=	10.00	

Length =	8	feet	
Equivalent Length =	9	feet	
Pipe Diameter	4	inches	
Static Head =	~~7.67~~	feet	8.49'
Friction Head - Lift Station=	0.88	feet	
Friction Head - Force Main=	0.19	feet	
Velocity Head	0.41	feet	
TDH =	9.16	feet	
Velocity =	4.22	fps	in 4" force main

8.79'

System Curve	
30	8.98
40	8.98
80	9.02
120	9.08
160	9.15
165	9.16

Peak influent (.3 mgd)	104 gpm
Standard Transfer (.05 mgd)	35 gpm

RCVD 8/9/13

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

January 23, 2013

Mr. Matthew Sherck, President
Pleasantview Utilities, Inc.
3812 W. Galaxy Drive
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: Pleasantview Utilities, Inc.
Project No. PS-1419
Connersville, Indiana
Fayette County

Your e-mail dated January 11, 2013, requested that this project be withdrawn from our construction permitting process. After Mr. Don Worley contacted you on January 15, 2013, you indicated that the submitted application forms, plans and specifications should be mailed to Ms. Ethel L. Morgan with Hometown Engineering, LLC. Be advised that this project has been withdrawn from our construction permitting process as requested.

If another application submittal is made within a reasonable amount of time after this project is withdrawn, the submitted review fee of $625.00 (six hundred and twenty five dollars) that was submitted with the original application submittal, can be applied to the new application submittal.

If you have any questions regarding this action, please contact Don Worley at 317/232-5579 or by e-mail at dworley@idem.in.gov.

Sincerely,

Dale Schnaith, Chief
Facility Construction and
Engineering Support Section
Office of Water Quality

Enclosures

cc: Ms. Ethel L. Morgan, P.E., Hometown Engineering, LLC

Pleasantview Utilities 3812 W Galaxy Drive, Connersville, IN 47331

January 11, 2013

Mr. Dharmendra Parikshak
IDEM Facility Construction and Engineering Support Section
100 North Senate Avenue
Indianapolis, IN 46206

Re: Pleasantview Utilities
Project No. PS-1419

Dear Mr. Parikshak:

I am requesting to withdraw our submittal of the plans and specifications submitted on October 15, 2012 for improvements to the Pleasantview wastewater treatment plant. I have attached a copy of the letter that I have addressed to Dave Knox in the IDEM Enforcement Section to provide you with the status of this project.

It is our intent to resubmit plans and specifications in June of this year after wet weather flow data can be evaluated. I am requesting that the $625 review fee be waived for the future submittal.

Thank you for your assistance in this matter.

Please let me know if additional information is needed. If you have questions, you can contact Ethel Morgan, HomeTown Engineering at (317) 780-8805, or me.

Sincerely,

Matt Sherck
President, Pleasant View Utilities, Inc.

Pleasantview Utilities 3812 W Galaxy Drive, Connersville, IN 47331

January 11, 2013

Mr. Dave Knox
IDEM Office of Enforcement
100 North Senate Avenue
Indianapolis, IN 46206

Re: Pleasantview Utilities
Case No. 2005-14957-W

Dear Mr. Knox:

As you are aware, Pleasantview Utilities retained HomeTown Engineering last year to evaluate our wastewater treatment plant, make recommendations for improvements to achieve compliance with our Agreed Order and to prepare plans and specifications for improvements. Shortly after contracting with HomeTown, a letter was sent to you to update you on our progress with the Compliance Plan.

During the evaluation stage, it became apparent to Ethel Morgan, the owner of HomeTown Engineering, that our flow meter was not functioning correctly. Ms. Morgan requested that I provide her with daily measurements over the weir and water purchase data so that accurate flows could be used for the design. Unfortunately, we did not have any wet weather during the monitoring period. As a result, while dry weather flows could be accurately predicted, industry standards were used to predict wet weather flows. Ms. Morgan recommended a flow meter to be installed and provided me with contact information for the supplier.

Plans and specifications were submitted to the Facility Construction & Engineering Support Section on October 15, 2012 and a technical review deficiency notice was dated November 15, 2012. Many of the questions related to the design of the proposed wet weather facilities and the sizing of those facilities. This deficiency notice opened up discussions regarding the lack of accurate wet weather flow data on which to base the design. It is my understanding that you have been included in some of this correspondence.

A new flow meter was installed and calibrated on January 4, 2013. A copy of the Certificate of Calibration is attached to this letter. The installed flow meter is a temporary meter that will be replaced with a permanent installation in a location to be determined by the final plans. All of the flow through the plant goes through this temporary meter; however, it does not measure the discharge flow. The new meter will measure the discharge.

We are requesting an extension of time to monitor flows during the wet weather spring period so that actual wet weather flow data can be used for the design of the treatment plant improvements. In the interim, I hope to also work with a firm to evaluate the collection system. Ms. Morgan has contacted M.E. Simpson on my behalf and we are waiting on their response and schedule.

I am requesting the following schedule for completion of the plans and specifications:

Flow measurement period	March 30, 2013
Plan and Spec Submittal	June 3, 2013
Construction Completion	Within 180 days of construction permitting

It is my intent to move forward with the collection system monitoring and improvements during the flow measurement and design periods.

Thank you for your assistance in this matter.

Please let me know if additional information is needed. If you have questions, you can contact Ethel Morgan, HomeTown Engineering at (317) 780-8805, or me.

Sincerely,

Matt Sherck
President, Pleasant View Utilities, Inc.

Cc: Dharmendra Parikshak

APPLICATION FOR WASTEWATER TREATMENT PLANT CONSTRUCTION PERMIT PER 327 IAC 3

STATE FORM 53160 (R2 / 9-08)
Approved by State Board of Accounts, 2007

Indiana Department of Environmental Management
Office of Water Quality – Mail Code 65-42
Facilities Construction Section
100 North Senate Avenue, room N1255
Indianapolis, IN 46204-2251

INSTRUCTIONS:

1. *This form must be filled out completely.*
2. *Additional pages (attachments following this form) are part of this application form and must be filled out completely.*
3. *Submission of plans, flow charts and/or schematic drawings are part of the application.*
4. *Submit the application form, additional pages, plans and specifications to the above address.*
5. *If you have any questions regarding this application, call IDEM's Office of Water Quality at (317) 232-8670.*

APPLICANT		APPLICANT'S ENGINEER	
Name Matthew Sherck		Name Ethel L. Morgan	
Company Name Pleasantview Utilities, Inc.		Company Name Hometown Engineering, LLC	
Address 3812 W. Galaxy Drive		Address 3417 South Sherman Drive, Suite B	
City Connersville		City Beech Grove	
State IN	ZIP code 47331	State IN	ZIP code 46107
Telephone number (*including area code*) (765) 309-2973		Telephone number (*including area code*) (317) 780-8805	

NAME AND LOCATION OF PROPOSED FACILITY	ATTACHMENT CHECKLIST
Name Pleasantview Utilities, Inc.	A. Wastewater treatment plant design summary form: ☒ Yes
Location (*Referenced to two existing streets*) 3812 W. Galaxy Drive, Connersville, IN 47331	B. Plans and specifications: ☒ Yes
Location SR 44 and CR 350 W	C. The appropriate fee (if applicable, no fees for state or federal projects): ☒ Yes
Location	D. Identification of Potentially Affected Persons (*see note below*): ☒Yes
City Connersville	E. Mailing Labels for Potentially Affected Persons: ☒Yes
County Fayette	

Note Regarding item (D) above:
Fully identify all persons, by name and address, who may be potentially affected by the issuance of this permit, such as adjoining landowners, persons with a propriety interest, and/or persons who have complained or submitted comments about your facility. ***Under IC 4-21.5-3-4, IDEM is required to notify potentially affected persons of its permit decision.***

PERMIT APPLICATION FOR CONSTRUCTION, EXPANSION, OR MODIFICATION OF (*Check all that apply*)	FUNDING
A. Municipal wastewater treatment facility: ☐Yes	SRF Funding: ☐Yes ☒No
B. Semipublic wastewater treatment facility: ☒Yes	
C. New facility: ☐Yes	recd 10/15/12
D. Expansion or modification of existing facility: ☒Yes	

CERTIFICATION AND SIGNATURE

Application is hereby made for a permit to authorize the activities described herein. I certify that I am familiar with the information contained in this application and to the best of my knowledge and belief such information is true, complete and accurate.

Printed name of person signing	Title
Matthew Sherck	President
Signature of Applicant Matthew Sherck	Date application signed (*month, day, year*) 10/12/12

Please refer to IC 13-30-10 for penalties of submission of false information

recd ~~$625~~ $625.00 check with APP Dmh

Pleasantview Utilities 3812 W Galaxy Drive, Connersville, IN 47331

October 12, 2012

Mr. Don Worley
Indiana Department of Environmental Management
Office of Water Quality – Mail Code 65-42
100 North Senate Avenue
Indianapolis, IN 46204-2251

Re: Pleasantview Utilities, LLC

Dear Mr. Worley:

Attached please find an application for construction permit, plans and specifications, and a check for improvements to the Pleasantview Utilities Wastewater Treatment Plant. With this application, we will be returning the plant to its originally rated capacity of .06 mgd and replacing the smaller non-functional aeration tank with a new equalization tank.

Pleasantview Utilities is under an Agreed Order to make improvements to its WWTP. The proposed improvements address the requirements of the Agreed Order at the WWTP.

Please give me a call if you have any questions.

Sincerely,
Pleasantview Utilities, LLC

Matt Sherck
President, Pleasant View Utilities, Inc.

Cc: Ethel Morgan, HomeTown Engineering, LLC

Attachments

APPLICATION FOR WASTEWATER TREATMENT PLANT CONSTRUCTION PERMIT PER 327 IAC 3

STATE FORM 53160 (R2 / 9-08)
Approved by State Board of Accounts, 2007

Indiana Department of Environmental Management
Office of Water Quality - Mail Code 65-42
Facilities Construction Section
100 North Senate Avenue, room N1255
Indianapolis, IN 46204-2251

INSTRUCTIONS:

1. *This form must be filled out completely.*
2. *Additional pages (attachments following this form) are part of this application form and must be filled out completely.*
3. *Submission of plans, flow charts and/or schematic drawings are part of the application.*
4. *Submit the application form, additional pages, plans and specifications to the above address.*
5. *If you have any questions regarding this application, call IDEM's Office of Water Quality at (317) 232-8670.*

APPLICANT		APPLICANT'S ENGINEER	
Name Matthew Sherck		Name Ethel L. Morgan	
Company Name Pleasantview Utilities, Inc.		Company Name Hometown Engineering, LLC	
Address 3812 W. Galaxy Drive		Address 3417 South Sherman Drive, Suite B	
City Connersville		City Beech Grove	
State IN	ZIP code 47331	State IN	ZIP code 46107
Telephone number (*including area code*) (765) 309-2973		Telephone number (*including area code*) (317) 780-8805	

NAME AND LOCATION OF PROPOSED FACILTY	ATTACHMENT CHECKLIST
Name Pleasantview Utilities, Inc.	A. Wastewater treatment plant design summary form: ☒ Yes
Location (*Referenced to two existing streets*) 3812 W. Galaxy Drive, Connersville, IN 47331	B. Plans and specifications: ☒ Yes
Location SR 44 and CR 350 W	C. The appropriate fee (if applicable, no fees for state or federal projects): ☒ Yes
Location	D. Identification of Potentially Affected Persons (*see note below*): ☒Yes
City Connersville	E. Mailing Labels for Potentially Affected Persons: ☒Yes
County Fayette	IDEM - AR PAID

Note Regarding item (D) above:
Fully identify all persons, by name and address, who may be potentially affected by the issuance of this permit, such as adjoining landowners, persons with a propriety interest, and/or persons who have complained or submitted comments about your facility. ***Under IC 4-21.5-3-4, IDEM is required to notify potentially affected persons of its permit decision.***

PERMIT APPLICATION FOR CONSTRUCTION, EXPANSION, OR MODIFICATION OF (*Check all that apply*)	FUNDING
A. Municipal wastewater treatment facility: ☐Yes	SRF Funding: ☐Yes ☒No
B. Semipublic wastewater treatment facility: ☒Yes	
C. New facility: ☐Yes	recd 10/15/12
D. Expansion or modification of existing facility: ☒Yes	

CERTIFICATION AND SIGNATURE

Application is hereby made for a permit to authorize the activities described herein. I certify that I am familiar with the information contained in this application and to the best of my knowledge and belief such information is true, complete and accurate.

Printed name of person signing	Title
Matthew Sherck	President
Signature of Applicant [signature]	Date application signed (*month, day, year*) 10/12/12

Please refer to IC 13-30-10 for penalties of submission of false information

IDEM - OEA RECEIVABLES 2012 OCT 16 P 2:28

Please process this check
Don Lang

IDENTIFICATION OF POTENTIALLY AFFECTED PERSONS

Please list any and all persons whom you have reason to believe have a substantial or proprietary interest in this matter, or could otherwise be considered to be potentially affected under law. Failure to notify a person who is later determined to be potentially affected could result in voiding our decision on procedural grounds. To ensure conformance with Administrative Orders and Procedures Act (AOPA) and to avoid reversal of a decision, please list all such parties. The letter on the opposite side of this form will further explain the requirements under the AOPA. Attach additional names and addresses on a separate sheet of paper, as needed.

Name	
Anthony Borders	
Address (*number and street*)	
3790 W. Galaxy Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Janet K. Benz	
Address (*number and street*)	
3331 W. Starlight Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Norma L. Callihan	
Address (*number and street*)	
3770 W. Galaxy Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Arthur J. Reisert	
Address (*number and street*)	
855 S. SUNRISE LANE	
City	
Connersville	
State	ZIP
IN	47331

Name	
Robert and Linda Thumb	
Address (*number and street*)	
3826 W. Galaxy Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
David and Wanda Earlywine	
Address (*number and street*)	
841 S. SUNRISE LANE	
City	
Connersville	
State	ZIP
IN	47331

Name	
Brian L. Guerin	
Address (*number and street*)	
3313 W. Starlight Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
Theresa L. Seale	
Address (*number and street*)	
839 S. SUNRISE LANE	
City	
Connersville	
State	ZIP
IN	47331

CERTIFICATION

I certify that to the best of my knowledge I have listed all potentially affected parties, as defined by IC 4-21.5-3-4.

Proposed facility name	Printed Name
Pleasantview Utilities	Matthew Sherck
City	Signature
Connersville	
County	Date (*month, day, year*)
Fayette	10-12-12

IDENTIFICATION OF POTENTIALLY AFFECTED PERSONS

Please list any and all persons whom you have reason to believe have a substantial or proprietary interest in this matter, or could otherwise be considered to be potentially affected under law. Failure to notify a person who is later determined to be potentially affected could result in voiding our decision on procedural grounds. To ensure conformance with Administrative Orders and Procedures Act (AOPA) and to avoid reversal of a decision, please list all such parties. The letter on the opposite side of this form will further explain the requirements under the AOPA. Attach additional names and addresses on a separate sheet of paper, as needed.

Name	
Fred and Geirgia Lucas	
Address (*number and street*)	
3325 W. Starlight Drive	
City	
Connersville	
State	ZIP
IN	47331

Name	
John R. and Bazzoni Cain	
Address (*number and street*)	
1212 Ranch Road	
City	
Connersville	
State	ZIP
IN	47331

Name	
Address (*number and street*)	
City	
State	ZIP

Name	
Address (*number and street*)	
City	
Connersville	
State	ZIP

Name	
Address (*number and street*)	
City	
Connersville	
State	ZIP

Name	
Address (*number and street*)	
City	
Connersville	
State	ZIP

Name	
Address (*number and street*)	
City	
State	ZIP

Name	
Address (*number and street*)	
City	
Connersville	
State	ZIP

CERTIFICATION

I certify that to the best of my knowledge I have listed all potentially affected parties, as defined by IC 4-21.5-3-4.

Proposed facility name	Printed Name
Pleasantview Utilities	Matthew Sherck
City	Signature
Connersville	
County	Date (*month, day, year*)
Fayette	10-12-12

IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

June 20, 2013

Mr. Matthew Sherck, President
Pleasantville Utilities, Inc.
3812 W. Galaxy Drive
Connersville, Indiana 47331

Dear Mr. Sherck:

Re: Deficiency Notice for
Construction Permit Application
Pleasantview Utilities, Inc.
Wastewater Treatment Plant
Improvements
Connersville, Indiana
Fayette County
Project No. PS-1419X

This will acknowledge the receipt of plans and specifications on June 3, 2013, in connection with your application for a Construction Permit, pursuant to IC 13-7-10 et. seq., and 327 IAC Article 3 et. seq., on the above-referenced project.

Your application has been found to be deficient. The following administrative and technical items are required to complete your application for a Construction Permit. Please be advised that if all the deficiency items are not corrected or resolved within sixty (60) days of the date of this letter, your application will be denied on the basis of incompleteness.

I. ADMINISTRATIVE EVALUATION

Upon review of your application, no administrative deficiencies were noted.

If you have any questions concerning the administrative accuracy of this application, please contact Don Worley at 317/232-5579, Fax 317/232-8637 or by e-mail at dworley@idem.in.gov.

II. TECHNICAL REVIEW

This office has completed review of the submitted project and offers the following technical comments:

1. When was the existing 60,000 GPD package plant constructed? What is the condition of this existing plant and equipment (e.g. blowers, clarifier mechanism, air lift pumps etc.)? Can the existing plant use be continued to treat design flows and wasteloads and achieve compliance with NPDES permit limits?

2. The average design flow as included in Section 2.D of the WWTP Design Summary (62,000 gpd) is inconsistent with the average design flow used in the calculations for the proposed plant (60,000 gpd). The existing package plant appears to be a 60,000 gpd plant based on the manufacturer information submitted with the construction permit application. Please revise the WWTP Design Summary to resolve this inconsistency.

3. The utility completed flow monitoring in the first few months of this year. Please provide appropriate information, analysis and outcome/results of this flow monitoring study to establish/justify average daily and peak hourly dry weather flows, and maximum daily and peak hourly wet weather flows.

4. Explain how the average design peak flow (peak hourly/design flow) of 90,000 gpd was established. Is 90,000 gpd the average design peak flow (peak hourly/design flow) that the existing package plant can handle without the proposed surge tank?

5. Explain how the maximum plant flow capacity of 90,000 gpd was established. Is 90,000 gpd the maximum daily flow that the proposed treatment plant (including proposed surge tank) can handle during wet weather without violating the NPDES permit limits?

6. Explain how the proposed treatment plant (including proposed surge tank) will handle/process influent flows greater than 90,000 gpd of maximum daily flow during wet weather.

7. The proposed design concentrations and wasteloads for BOD and TSS (and maybe NH3-N as well) appear to be much lower than what the existing plant has been experiencing, and also much lower than the estimated design wasteloads (based on the standard design wasteloads and design year population of 620). Please provide justification for the proposed WWTP design wasteloads or revise the WWTP design wasteloads based on the justifiable information.

8. Explain why Section A-A for the modified existing splitter structure as shown on plan sheet 7 indicates bar screen clear spacing to be of 1" and a maximum of 1 ¾". Isn't the proposed bar spacing going to be 1" as indicated in the WWTP Design Summary? Please resolve this inconsistency. Also, please revise Section A-A on plan sheet 7 to add a note indicating that the existing overflow pipe to surge tank will need to be plugged off.

9. It is recommended that the proposed design (WWTP Design Summary and plans) be revised to propose flow splitter/control box instead of flow splitter box and to pump wastewater stored in the surge tank back into the flow splitter/control box instead of sending it directly to the existing package plant which will flood the package plant. It is recommended that the flow splitter/control box include weirs and baffles to appropriately and effectively split/control influent wastewater flows and pumped wastewater from the surge tank to the existing package plant and proposed surge tank. Also, provide the proposed flow splitter/control box operational information and supporting calculations to demonstrate how it will split/control flows to the existing package plant and proposed surge tank. Also, revise flow splitter box plan and section views as included on plan sheet 7 to clearly show dimensions of the flow splitter/control box, weirs, pipes, baffles (including top, bottom and invert elevations) etc.

10. Please provide TDH calculations for the proposed surge tank pumps.

11. Please revise the proposed treatment plant design and calculations (e.g. aeration tanks, clarifiers, chlorine contact tank, digester etc.) based on the justifiable wastewater flows and wasteloads. Please revise the WWTP Design Summary to reflect the revised design information.

12. Are the top and bottom elevations of the existing aeration/treatment tank as shown on the existing and proposed hydraulic profiles on plan sheet 4 (892.5' and 882.5', respectively) correct? Please note that the drawing from Aer-O-Flo Corporation (manufacturer of this package plant) as included with the permit application indicates that the tank will be 11 feet deep. Please revise plan sheet 4, if necessary, to reflect correct elevations.

13. Please revise plan sheet 3 to show the location of the proposed blower. Is the proposed blower going to have VFD to provide for speed adjustment as indicated on the WWTP Design Summary? If true, please revise plans to require VFD for the proposed new blower.

14. Please provide calculations to demonstrate how an aeration tank SRT of 14 days as shown in the WWTP Design Summary was established.

15. Is the existing clarifier SWD 11'3" as per the information from Aer-O-Flo Corporation (the manufacturer of this package plant) or 8' as indicated on the WWTP Design Summary? Please revise the WWTP Design Summary, if necessary, to reflect correct information.

16. In regards to the existing tertiary/polishing ponds to be taken out of service, Mr. Jerry Dittmer, Section Chief of the IDEM Municipal NPDES Permits Section, in an email dated November 29, 2012 to your engineer and you indicated that "removal of the tertiary ponds would require sampling to demonstrate that their removal would not degrade effluent quality. General compliance with the NPDES permit would also be required before any allowance of removal of treatment units would be considered". Since the utility has not yet provided "sampling data to demonstrate that removal of

ponds would not degrade effluent quality" and the proposed WWTP design will not achieve compliance with the NPDES permit, it is prudent that the terminal ponds be kept in service at this time. Please revise the proposed design (including the WWTP Design Summary and plans) to keep polishing/tertiary ponds in service.

17. Please explain how 200,000 gpd of peak flow for the proposed chlorine contact chamber was established? Also, explain how the proposed precast chlorine contact chamber with effluent pipe invert and bottom elevations at 888.4' and 887', respectively (as shown on plan sheet 8), would provide for a side water depth of 3 feet to achieve 15 minutes detention time at 200,000 gpd peak flow. Please revise plans and the proposed design, if necessary, to address this comment.

18. Please revise plans to show location of the proposed diffused post aeration.

19. Please revise plan sheet 8 to clarify what size Palmer-Bowlus flume is proposed for this plant and to specify the flow range that can be accurately monitored/measured by the proposed flume.

20. The existing treatment plant outfall is proposed to be relocated to the west towards existing homes/subdivision instead of away from the existing homes. Has the Utility contacted/notified nearby homeowners to get their support for this outfall relocation?

If you have any questions regarding the technical matters of your application, please contact me at 317/232-8660 or by e-mail at dpariksh2@idem.in.gov.

Sincerely,

Dharmendra Parikshak
Project Engineer
Facility Construction and
Engineering Support Section
Office of Water Quality

cc: Ms. Ethel L. Morgan, P.E., Hometown Engineering, LLC

Pleasantview Utilities

3812 W Galaxy Drive, Connersville, IN 47331

IDEM
OFFICE OF
WATER QUALITY
2013 AUG -9 A 10:26

PS-1419X

August 7, 2013

Mr. Dharmendra Parikshak
Indiana Department of Environmental Management
Office of Water Quality
Facility Construction and Engineering Support Section
100 North Senate Avenue
Indianapolis, IN 46204-2251

Re: Pleasantview Utilities, LLC

Dear Mr. Parikshak:

This letter is written in response to your review comments of June 20, 2013 for the subject utility. The technical review comments are addressed following.

1. The existing 60,000 gpd plant was constructed in 1974. The condition of the plant and equipment is adequate to continue to treat the design flows.

2. The Design Summary has been revised to reflect the average design flow of 60,000 gpd.

3. The flow monitoring that was completed did not provide hourly flows. The meter was read once per day. The MRO's for this period are attached. Peak hourly flows are not available.

4. The 30,000-gallon surge tank was sized based on the area available for construction. It is not meant to imply that this is the average design peak flow. We do not believe that this tank will allow us to achieve compliance in high flow conditions. The goal is to provide some relief for the plant during elevated flow conditions. Until the issues within the collection system are resolved and the I/I removed, the plant will not have the capacity to treat peak wet weather flows. The goal will be to minimize the flows to the plant so that the EQ basin can help the plant achieve compliance. During the first 3 months of 2013, the average flow through the plant was .052 mgd. The average peak design flow was .207 mgd. The 90,000 gpd is the maximum flow that the plant can handle with the proposed surge tank.

5. Based on calculations, 90,000 gpd is the maximum daily flow that the plant can handle without violating NPDES permit limits.

6. The proposed control box and surge tank has been revised to recirculate the flow until such time that influent flows recede or the surge tank overflows into the aeration basin. Until the work in the collection system can be completed with additional flow monitoring to evaluate the success, it is not possible to size an equalization structure to handle the peak flows. The intent is that flows in excess of the capacity of the surge tank and recirculation ability will wash through the plant and the plant will operate as it does today with flows in excess of 60,000 gpd.

7. The proposed design and wasteloads for BOD, TSS, and NH3-N have been revised to match Ten States Standards. Revised calculation sheets are attached.

8. The proposed bar screen spacing is a minimum of 1" and a maximum of 1 ¾" per Ten States Standards. The drawing has been revised to indicate a minimum clear space opening of 1".

9. The plans have been revised to show the excess flows from the surge tank pumping back to the flow splitter/control box. More detail has been provided in the plans for the control structure.

10. TDH calculations for the proposed surge tank pumps are attached.

11. The Design Summary and calculations have been revised based on the revised influent loadings.

12. Plan Sheet 4 has been revised to correct the bottom and water elevations.

13. Plan Sheet 3 has been revised to show the location of the existing and proposed blowers. The spec sheet for the proposed blower has been revised to indicate on/off flow control.

14. The SRT calculation has been revised.

15. The SWD is 12'1" at the center of the hopper per the information from Aer-O-Flo. The design summary has been corrected.

16. The design summary and plans have been revised to keep the ponds in operation.

17. The peak flow of 200,000 gpd through the chlorine contact tank was established based on the peak flow allowed per the manufacturer of the proposed equipment. The plans have been revised to raise the effluent invert to provide for 3' of detention. During the four month flow monitoring period, flows exceeded 200,000 gallons six times, once in January, once in March, and four times in April. It should be noted that this was a very wet spring.

18. The diffused post aeration pipe is shown at the effluent of the chlorine contact chamber on Sheet 8. A note has been added to Sheet 3 to identify the location on the propose site plan.

19. Plan Sheet 8 has been revised to indicate the size of Palmer Bowlus Flume. The flow range that can be accurately monitored is .0029 mgd to .4451 mgd. The flow chart from the flume manufacturer is attached.

20. No, the utility has not contacted the homeowners regarding this revision. The plant outfall is proposed to be relocated with the intention of eventually abandoning the ponds. Also, there is no space available at the discharge of the ponds to construct the chlorine contact tank. The IDEM Permit Section has been contacted regarding this change, and had no problems. While the new discharge is closer to the existing homes, the treatment plant is also in very close proximity. The new discharge will not interfere with the adjacent properties as much as the noise of the blowers.

Please give me a call if you have any questions.

Sincerely,
Pleasantview Utilities, LLC

Matt Sherck
President, Pleasant View Utilities, Inc.

Cc: Ethel Morgan, HomeTown Engineering, LLC

Attachments

Parikshak, Dharmendra

From: Ethel Morgan [hometowneng@sbcglobal.net]
Sent: Monday, August 19, 2013 2:31 PM
To: Parikshak, Dharmendra
Cc: Scherck, Matt
Subject: Re: Pleasantview
Attachments: 20130819 -pdf- Pleasantview Utilities.pdf; Equipment List - Submittal 8-12-13.pdf

Dharmen,

I am attaching the revised plans and the Equipment Specifications.

Sheet 3 has been revised to add the note regarding the conversion of the surge tank and aerobic digester to sludge storage tanks.
Sheet 4 has been revised to fix the hydraulic profile.
Sheet 7 has been revised to indicate that the V-notch shall be a Slider.
Sheet 9 has been revised to show the new head conditions for the sludge transfer pumps.

The capacity of the bar screen is 1 mgd.

I have reviewed your draft design summary and offer the following comments:

Page 4 - The surge tank has a total capacity of 30,698 gallons. The total depth is between 892.5 and the bottom (882) for a depth of 9.5 feet.
Page 9 - I do not think there are any plant bypasses. The flow will pass through all treatment processes.

I do not have the letter from the sludge hauler yet. Is it possible to issue a permit where the start of construction is contingent on IDEM receiving the letter?

Thanks for your assistance!

Ethel L. Morgan, PE
HomeTown Engineering, LLC
3417 South Sherman Drive, Suite B
Beech Grove, IN 46107
(317) 780-8805
(317) 780-8806 fax

From: "Parikshak, Dharmendra" <DPariksh2@idem.IN.gov>
To: Ethel Morgan <hometowneng@sbcglobal.net>
Sent: Tuesday, August 13, 2013 12:05 PM
Subject: RE: Pleasantview

Hello Ethel,
I have attached a draft design summary for this project. Please let me know if you have any question/concern with anything.

I wanted you to address/clarify following items:

1. What is the proposed capacity of the coarse bar screen (should be able to handle peak flows to the plant)?
2. Add a note on one of the plan sheet to indicate that existing surge tank and aerobic digester to be modified/converted to sludge storage tanks.
3. Can you provide me with a letter from the sludge hauling contractor?
4. Can you clarify what "Units, unit operation, and plant bypasses" are provided?

Also, as we discussed yesterday you are going to fix hydraulic profile on sheet 4 to switch locations of palmer bowlus flume and junction chamber and provide me with a revised specs cover sheet (including new pump information).

Please contact me if you have any questions. Thanks.
Dharmendra
(317) 232 8660

From: Ethel Morgan [mailto:hometowneng@sbcglobal.net]
Sent: Wednesday, August 07, 2013 2:09 PM
To: Parikshak, Dharmendra
Subject: Re: Pleasantview

Here they are.

I still have to have Matt sign the cover letter before I can mail them. I have not heard back from him yet today.

Ethel L. Morgan, PE
HomeTown Engineering, LLC
3417 South Sherman Drive, Suite B
Beech Grove, IN 46107
(317) 780-8805
(317) 780-8806 fax

From: "Parikshak, Dharmendra" <DPariksh2@idem.IN.gov>
To: Ethel Morgan <hometowneng@sbcglobal.net>
Sent: Wednesday, August 7, 2013 1:08 PM
Subject: RE: Pleasantview

Sure. Thanks.

From: Ethel Morgan [mailto:hometowneng@sbcglobal.net]
Sent: Wednesday, August 07, 2013 12:26 PM
To: Parikshak, Dharmendra
Subject: Pleasantview

Dharmen,

I am going to be mailing Pleasantview revisions to you tomorrow.

Would it be beneficial for me to send the package to you electronically this afternoon?

Ethel L. Morgan, PE
HomeTown Engineering, LLC
3417 South Sherman Drive, Suite B
Beech Grove, IN 46107
(317) 780-8805
(317) 780-8806 fax

Pleasantview Infiltration & Inflow Analysis – All Monthly Data

Month-Year	WWTP Effluent		Water Sold		OUCC Calculated I&I			I&I Rate
	Avg. gpd	gpcd	Avg. gpd	gpcd	Avg. gpd	gpcd	% of Effl.	gpd/in-mile
Jan-21	47,645	91.4	21,548	41.4	26,097	50.1	55%	1,165
Feb-21	36,964	70.9	27,643	53.1	9,321	17.9	25%	416
Mar-21	36,097	69.3	22,548	43.3	13,548	26.0	38%	605
Apr-21	43,433	83.4	24,067	46.2	19,367	37.2	45%	865
May-21	27,258	52.3	23,484	45.1	3,774	7.2	14%	168
Jun-21	17,400	33.4	24,233	46.5	-6,833	-13.1	-39%	-305
Jul-21	46,161	88.6	23,613	45.3	22,548	43.3	49%	1,007
Aug-21	71,000	136.3	26,677	51.2	44,323	85.1	62%	1,979
Sep-21	62,800	120.5	24,700	47.4	38,100	73.1	61%	1,701
Oct-21	38,419	73.7	19,226	36.9	19,194	36.8	50%	857
Nov-21	21,900	42.0	25,800	49.5	-3,900	-7.5	-18%	-174
Dec-21	20,839	40.0	21,000	40.3	-161	-0.3	-1%	-7
Jan-22	44,452	84.3	22,742	43.2	21,710	41.2	49%	969
Feb-22	22,321	42.4	22,393	42.5	-71	-0.1	0%	-3
Mar-22	32,948	62.5	23,290	44.2	9,658	18.3	29%	431
Apr-22	19,900	37.8	21,767	41.3	-1,867	-3.5	-9%	-83
May-22	32,000	60.7	25,387	48.2	6,613	12.5	21%	295
Jun-22	33,103	62.8	27,400	52.0	5,703	10.8	17%	255
Jul-22	32,035	60.8	20,839	39.5	11,197	21.2	35%	500
Aug-22	11,806	22.4	24,258	46.0	-12,452	-23.6	-105%	-556
Sep-22	12,033	22.8	22,400	42.5	-10,367	-19.7	-86%	-463
Oct-22	20,452	38.8	23,355	44.3	-2,903	-5.5	-14%	-130
Nov-22	18,600	35.3	28,000	53.1	-9,400	-17.8	-51%	-420
Dec-22	78,645	149.2	25,935	49.2	52,710	100.0	67%	2,353
Jan-23	35,419	66.6	22,452	42.2	12,968	24.4	37%	579
Feb-23	30,479	57.3	25,179	47.3	5,300	10.0	17%	237
Mar-23	26,065	49.0	26,290	49.4	-226	-0.4	-1%	-10
Apr-23	54,900	103.2	22,333	42.0	32,567	61.2	59%	1,454
May-23	38,581	72.5	25,613	48.1	12,968	24.4	34%	579
Jun-23	12,433	23.4	28,533	53.6	-16,100	-30.3	-129%	-719
Jul-23	21,774	40.9	24,710	46.4	-2,935	-5.5	-13%	-131
Aug-23	18,742	35.2	27,645	52.0	-8,903	-16.7	-48%	-397
Sep-23	10,333	19.4	22,633	42.5	-12,300	-23.1	-119%	-549
Oct-23	8,613	16.2	21,452	40.3	-12,839	-24.1	-149%	-573
Nov-23	12,433	23.4	27,367	51.4	-14,933	-28.1	-120%	-667
Dec-23	6,345	11.9	22,774	42.8	-16,429	-30.9	-259%	-733
Average	30,676	58.4	24,147	45.8	6,529	12.5	21%	291.5

Pleasantview I&I Analysis – Months with Negative I&I Excluded

Month-Year	WWTP Effluent		Water Sold		OUCC Calculated I&I			I&I Rate
	Avg. gpd	gpcd	Avg. gpd	gpcd	Avg. gpd	gpcd	% of Effl.	gpd/in-mile
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Dec-21	20,839	40.0	21,000	40.3	-161	-0.3	-1%	-7
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Jun-23	12,433	23.4	28,533	53.6	-16,100	-30.3	-129%	-719
Jul-23	21,774	40.9	24,710	46.4	-2,935	-5.5	-13%	-131
Aug-23	18,742	35.2	27,645	52.0	-8,903	-16.7	-48%	-397
Sep-23	10,333	19.4	22,633	42.5	-12,300	-23.1	-119%	-549
Oct-23	8,613	16.2	21,452	40.3	-12,839	-24.1	-149%	-573
Nov-23	12,433	23.4	27,367	51.4	-14,933	-28.1	-120%	-667
Dec-23	6,345	11.9	22,774	42.8	-16,429	-30.9	-259%	-733
Average	43,281	83.6	23,930	45.6	19,351	37.9	45%	887.9

Pleasantview Utilities, Inc. Wastewater

Cause No. 46122-U

Data Source: IURC Annual Reports

OUCC Calculation of Average Water Meter Age

			Manual Read Water Meters					203 Recent Meters		
Year	**Res. Cust.**	**Total Cust.**	**Total**	**New**	**Repl.**	**Age (Yrs.)**		**New**	**Age (Yrs.)**	
a	**b**	**c**	**d**	**e**	**f**	**g**	**e x g**	**e**	**g**	**e x g**
2007	195	195								
2008	192	192	192	12	12	16	192			
2009	193	193	220	30	30	15	450			
2010	192	192	220	15	15	14	210			
2011	185	185	220	10	10	13	130			
2012	194	194	195	10	10	12	120			
2013	197	197	210	30	30	11	330	26	11	286
2014	194	194	210	81	81	10	810	81	10	810
2015	196	196	220	5	4	9	36	5	9	45
2016	194	194	222	12	12	8	96	12	8	96
2017	195	195	215	20	20	7	140	20	7	140
2018	196	196	205	15	15	6	90	15	6	90
2019	196	196	205	15	15	5	75	15	5	75
2020	196	196	205	10	10	4	40	10	4	40
2021	199	199	205	5	5	3	15	5	3	15
2022	201	201	230	5	5	2	10	5	2	10
2023	203	203	231	9	8	1	8	9	1	9
2024										
Total				284	282		2752	203		1616
Avg.	195	195	213	17.8	17.6	9.76	years		7.96	years

Notes:

1. Pleasantview Utilities, Inc. reports all meters are manual read meters.
2. The average meter age based on 2008 to 2023 meter data is 9.76 years.
3. The average meter age based on the most recent 203 meters is 7.96 years.

Pleasantview WWTP Site Visit Photos taken by the OUCC on July 18, 2002 and Nov. 21, 2024.

Fig. 1 – 2002 Photo. View SE of the 60,000 gpd steel package plant installed in 1974. The original 16,700 gpd. package plant is at left center. Polishing ponds are beyond.

Fig. 2 – 2024 Photo View SE of the 1974, 60,000 gpd steel package plant with polishing ponds beyond. Note replacement air header pipe is a tripping hazard above the center walkway grating.

Fig. 3 – 2002 Photo of the 1974 Package Plant tankage and the original Package Plant at left. Note the grated walkway is free of tripping hazards.

Fig. 4 – 2024 Photo of the 15,000 gal. sludge tank in front with two aeration basins (30,000 gallons each-center right) and blowers in upper right.

Fig. 5 – 2024 Photo - View NE of the 15,000 gal. sludge tank (left) and aeration basins (right)

Fig. 6 – 2024 Photo - View SE of the corroded steel wall between the sludge tank (foreground) and aeration basins beyond. Applicant has inserted replacement pipe through the wall crack.

Fig. 7 – 2024 Photo - View of sludge holding tank showing rusted walls, piping through corroded wall cracks and bowed wall (at left).

Fig. 8 – 2024 Photo -Close-up view of the bowed NW wall showing loss of paint coating, flaking steel rust, and vegetation. Additional beams (angled) appear added to retain the bowed wall.

Fig. 9 – 2002 Photo – View looking south of the 1974 Package Plant of the surge tank, sludge tank, aeration basins (middle left), blowers and polishing ponds beyond.

Fig. 10 – 2024 Photo – View NW showing the sagging center walkway and air header trip hazard.

Fig. 11 – 2002 Photo – View N of the 1974 Package Plant aeration basins and blowers (center) and clarifiers (at right)

Fig. 12 – 2024 Photo – View N of the 1974 Package Plant aeration basins and blowers (center) and clarifiers (at right). Note the rust on the tank walls and gratings.

Fig. 13 – 2002 Photo – View NW of clarifiers

Fig. 14 – 2024 Photo – View NE of clarifiers with blowers at left.

Fig. 15 – 2024 Photo - View NW of floating sludge along clarifier weirs and holes in wall at right.

Fig. 16 – 2024 Photo of the emergency generator next to the shed.

Fig. 17 – 2024 Photo View SE of notch cut out of the wall which allows overflows to exit the aeration basin and flow to the pond.

Fig. 18 – 2024 Photo View SW of notch cut out of the wall which allows overflows to exit the aeration basin and flow to the pond.

Fig. 19 – 2024 Photo - View of holes thru tank wall at clarifiers

Fig. 20 – 2024 Photo - View of shallow manhole in ditch line.

Fig. 21 – 2024 Photo - View of holes through tank wall at clarifiers.

Fig. 22 – 2024 Photo – Outfall location with ground eroded at fence line.

327 IAC 5-10-6 Disinfection requirements

Authority: IC 13-13-5; IC 13-14-8; IC 13-14-9; IC 13-15-1-2; IC 13-15-2-1; IC 13-18-3
Affected: IC 13-11-2; IC 13-18-4

Sec. 6. (a) Disinfection is required of all sanitary wastewater discharges on an annual basis for the period of April 1 through October 31 except multicelled waste stabilization ponds that are:

(1) adequately designed and operated;

(2) not either hydraulically or organically overloaded; and

(3) in compliance with the provisions of section 3(c) of this rule.

(b) Disinfection is not required and is not expected to be practiced on an annual basis for the period of November 1 through March 31, except as necessary to comply with one (1) or more of the following:

(1) ORSANCO requirements (for discharges directly to the Ohio River).

(2) The requirements of other states for interstate waters.

(3) The provision of section 4(c) of this rule.

In cases where chlorination must be practiced during this period, for example, to maintain sand filters, the maximum effluent limitation and monitoring requirements for chlorine remain in effect.

(c) The following are requirements for facilities using chlorine or other halogenated compounds as a disinfectant:

(1) For those sanitary wastewater dischargers designated as minor facilities (generally those with a population equivalent (PE) of less than ten thousand (10,000)), the following requirements must be met:

(A) Residual chlorine concentration after disinfection (but prior to dechlorination) is to be maintained at a minimum of five-tenths (0.5) milligram per liter.

(B) The final effluent must comply with subsection (e).

(2) For those sanitary wastewater dischargers designated as major facilities (those with a PE of ten thousand (10,000) or greater), the following requirements must be met:

(A) No minimum residual chlorine limitation applies.

(B) The final effluent must comply with subsection (e).

(3) Dechlorination is to be practiced for all:

(A) sanitary wastewater discharges using chlorine or bromine compounds as a disinfectant; or

(B) filter or other equipment maintenance at any time;

so that the concentration of total residual chlorine (TRC) or, where bromine is used, TRO in the final effluent does not exceed water quality-based effluent limitations. If these water quality-based limitations are below the LOQ, compliance with the water quality-based effluent limitations will be determined using the applicable procedures contained under 327 IAC 5-2-11.1 or 327 IAC 5-2-11.6.

(d) Facilities using a disinfectant other than chlorine or other halogen compounds shall ensure that the final effluent complies with subsection (e) during the applicable recreation season as indicated in the facility's NPDES permit.

(e) Sanitary wastewater dischargers shall ensure the following:

(1) The concentration of E. coli in the undiluted discharge does not exceed one hundred twenty-five (125) cfu or MPN per one hundred (100) milliliters as a geometric mean of the effluent samples taken in a calendar month.

(2) Not more than ten percent (10%) of all samples when not less than ten (10) samples are taken and analyzed for E. coli in a calendar month exceed two hundred thirty-five (235) cfu or MPN per one hundred (100) milliliters as a daily maximum. Under this subdivision, the calculation of ten percent (10%) of the samples taken shall be limited to the lowest whole number result.

(Water Pollution Control Division; 327 IAC 5-10-6; filed Feb 26, 1993, 5:00 p.m.: 16 IR 1774; filed Jan 14, 1997, 12:00 p.m.: 20 IR 1475; readopted filed Jan 10, 2001, 3:23 p.m.: 24 IR 1518; readopted filed Nov 21, 2007, 1:16 p.m.: 20071219-IR-327070553BFA; filed Mar 18, 2008, 2:26 p.m.: 20080416-IR-327060573FRA; readopted filed Jul 29, 2013, 9:21 a.m.: 20130828-IR-327130176BFA; readopted filed Jun 14, 2019, 1:59 p.m.: 20190710-IR-327190246BFA; readopted filed Oct 18, 2024, 1:57 p.m.: 20241113-IR-327230810RFA)

327 IAC 5-10-7 Connection and regionalization

Authority: IC 13-14-8; IC 13-15-1-2; IC 13-15-2-1; IC 13-18
Affected: IC 13-18-4; IC 13-18-15; IC 13-18-19

Sec. 7. (a) If the commissioner finds it is in the interest of the health, safety, convenience, and welfare of the residents of any area, any person, publicly or semipublicly owned sewage treatment systems may be ordered to connect to and/or receive and treat sewage from any other person or from an industry, shopping center, mobile home park, school, or housing development when such service and use will not result in irreparable injury to the receiving equipment or make impossible the rendering of the service previously rendered to the users of such equipment. The persons involved shall negotiate the terms for such connection and service, in accordance with the terms of IC 13-18-15.

(b) Any new school, mobile home park, motel, motor court, or motor hotel shall dispose of sewage through the use of a public sewerage system if the sewerage system is available within a reasonable distance from the facility.

(c) Any existing school, mobile home park, motel, motor court, or motor hotel with a direct discharge of sewage, as authorized by an NPDES permit shall connect to a public sewerage system, discontinue the direct discharge, and abandon their wastewater treatment plant if a public sewerage system becomes available at any time within a reasonable distance from the facility. In this instance, "reasonable distance" is related to cost. The intent of this provision is to encourage the entities mentioned in this section to compare the cost of connecting to a sewerage system against the cost to build or upgrade and operate a sewage treatment plant. *(Water Pollution Control Division; 327 IAC 5-10-7; filed Feb 26, 1993, 5:00 p.m.: 16 IR 1775; readopted filed Jan 10, 2001, 3:23 p.m.: 24 IR 1518; readopted filed Nov 21, 2007, 1:16 p.m.: 20071219-IR-327070553BFA; readopted filed Jul 29, 2013, 9:21 a.m.: 20130828-IR-327130176BFA; errata filed Jul 31, 2017, 11:06 a.m.: 20170809-IR-327170349ACA; readopted filed Jun 14, 2019, 1:59 p.m.: 20190710-IR-327190246BFA; readopted filed Oct 18, 2024, 1:57 p.m.: 20241113-IR-327230810RFA)*

Rule 11. Pretreatment Program; General Provisions *(Repealed)*

(Repealed by Water Pollution Control Division; filed Oct 10, 2000, 3:02 p.m.: 24 IR 317)

Rule 12. Applicable Pretreatment Standards and Other Pretreatment Requirements *(Repealed)*

(Repealed by Water Pollution Control Division; filed Oct 10, 2000, 3:02 p.m.: 24 IR 317)

Rule 13. POTW Pretreatment Programs *(Repealed)*

(Repealed by Water Pollution Control Division; filed Oct 10, 2000, 3:02 p.m.: 24 IR 317)

Rule 14. Revision of Categorical Pretreatment Standards to Reflect Consistent Removal of Pollutants by a POTW *(Repealed)*

(Repealed by Water Pollution Control Division; filed Oct 10, 2000, 3:02 p.m.: 24 IR 317)

Rule 15. Industrial Waste Pretreatment Permit Program *(Repealed)*

(Repealed by Water Pollution Control Division; filed Oct 10, 2000, 3:02 p.m.: 24 IR 317)

Rule 16. General Provisions

327 IAC 5-16-1	Purpose and objectives
327 IAC 5-16-2	Local authority
327 IAC 5-16-3	Public access to information and confidentiality claims
327 IAC 5-16-4	Enforcement
327 IAC 5-16-5	Reporting requirements for POTWs and industrial users
327 IAC 5-16-5.3	Additional reporting requirements for POTWs and industrial users
327 IAC 5-16-5.5	Annual POTW reports
327 IAC 5-16-6	Upset
327 IAC 5-16-7	Bypass

327 IAC 5-16-1 Purpose and objectives

Authority: IC 13-14-8; IC 13-15-1-2; IC 13-15-2-1; IC 13-18-2; IC 13-18-3
Affected: IC 13-11-2; IC 13-13-5-1; IC 13-18-3-15; IC 13-18-4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO ATTENTION OF
ECW-15J

VIA ELECTRONIC MAIL

Mr. Matt Sherck, President
Pleasantview Utilities Wastewater Treatment Plant
3812 West Galaxy Drive
Connersville, Indiana 47331

msherck@co.fayette.in.us

Re: Final Administrative Order on Consent Regarding Clean Water Act Violations at the Pleasantview Utilities Wastewater Treatment Plant, in Connersville, Indiana.

Dear Mr. Sherck:

Please find the enclosed final and effective Administrative Order on Consent (AOC) designed to bring the Pleasantview Utilities Wastewater Treatment Plant into compliance with the Clean Water Act. The effective date of the AOC is the date the AOC was signed by EPA. As stated in the AOC, neither issuance of the AOC nor compliance with its terms precludes further enforcement action by EPA, including an action for penalties, under the CWA.

Thank you for your timely attention to this matter. If you have any questions regarding the AOC please contact Dean Maraldo of my staff at (312) 353-2098. For legal inquiries, please contact Cynthia King, Associate Regional Counsel, at (312) 886-6831.

Sincerely,

DiCosmo, Nefertiti
Digitally signed by DiCosmo, Nefertiti
Date: 2022.01.24 13:29:42 -06'00'

Nefertiti DiCosmo, Branch Manager
Water Enforcement and Compliance Assurance Branch

Enclosure: Final Administrative Order on Consent

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	
	)	
Pleasantview Utilities Wastewater Treatment Plant,	)	**Administrative Order on Consent Under Section 309(a) of the Clean Water Act, 33 U.S.C. § 1319(a)**
	)	
NPDES Number IN0044776	)	
	)	
Respondent.	)	

ADMINISTRATIVE ORDER ON CONSENT

1. The U.S. Environmental Protection Agency ("EPA") makes the findings of fact set forth below and is issuing this Administrative Order on Consent ("Order on Consent" or "Order") to Pleasantview Utilities, Inc., also known as Pleasant View Utilities, Inc. ("Respondent") under the authority of Section 309(a) of the Clean Water Act ("CWA" or "Act"), 33 U.S.C. § 1319(a). The Administrator of EPA has delegated the authority to issue such orders to the Regional Administrator of EPA Region 5, who has redelegated this authority to the Director of the Enforcement and Compliance Assurance Division, EPA, Region 5.

Statutory and Regulatory Background

2. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant by any person except, *inter alia*, in compliance with an NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

3. Section 402 of the CWA, 33 U.S.C. § 1342, authorizes states to request approval from EPA to administer their own permit programs for discharges into navigable waters within their jurisdictions.

4. Pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, the State of Indiana requested approval from EPA to administer its own permit program for discharges into navigable waters within Indiana, and such approval was granted by EPA on January 1, 1975, 40 Fed. Reg. 4,033 (Jan. 27, 1975). Therefore, pursuant to the State's permit program, the Indiana Department of Environmental Management ("IDEM") has issued NPDES permits. Violation of an NPDES permit is a violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

5. Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), provides that whenever EPA finds that any person is in violation of requirements of, *inter alia*, Sections 301, 308, or 402 of the CWA, 33 U.S.C. § 1311, 1318, 1342, or is in violation of any condition or limitation that implements those sections in an NPDES permit, EPA shall issue an order requiring such person to comply with such requirements, conditions, or limitations. Section 309(a)(5) of the

CWA, 33 U.S.C. § 1319(a)(5), requires that any such order shall specify a time for compliance that EPA determines to be reasonable taking into account the seriousness of the violation and any good faith efforts to comply with applicable requirements.

6. All terms used, but not defined, in this Order have the meanings provided in the CWA, 33 U.S.C. § 1251 *et seq.*, and the effective EPA regulations promulgated under the CWA.

Findings

7. Respondent is a corporation and, is, therefore, a "person," as defined in Section 502(5) of the CWA, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.

8. At all times relevant to this Order ("all relevant times"), the Respondent owned or operated the Pleasantview Utilities Wastewater Treatment Plant ("Facility"), Fayette County, Connersville, Indiana. Respondent was, therefore, an "owner or operator" within the meaning of 40 C.F.R. § 122.2.

9. At all relevant times, the Facility acted as a "point source" of a "discharge" of "pollutants", including ammonia-nitrogen, total suspended solids, total suspended solids percent removal, dissolved oxygen, total residual chlorine, and *E.coli,* with its wastewater discharging into an unnamed tributary that drains to Williams Creek, then to the Whitewater River, then to the Great Miami River, then to the Ohio River.

10. Outfall No. 001 at the Facility is a "point source," as defined in Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

11. Ammonia-nitrogen, total suspended solids, total suspended solids percent removal, dissolved oxygen, total residual chlorine, and *E.coli* are "pollutants," as defined in Section 502(6) of the CWA, 33 U.S.C. § 1362(6).

12. The discharge described in paragraph 9 is a "discharge of a pollutant," as defined in Section 502(12) of the CWA, 33 U.S.C. § 1362(12).

13. Williams Creek, Whitewater River, Great Miami River, and the Ohio River are "navigable waters" within the meaning of Section 502 of the CWA, 33 U.S.C. § 1362(7), and "waters of the United States" within the meaning of 40 C.F.R. § 120.2 (1993, 2020), including waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, and tributaries to such waters.

14. At all times relevant to this Order, the outfall at the Facility acted as point source of "discharges" of "pollutants" with its final wastewater discharge to an unnamed tributary that drains to Williams Creek.

15. Because Respondent owned or operated a facility with an outfall that acted as a point source for the discharge of pollutants to navigable waters, Respondent and the facility have been

subject to the CWA at all times relevant to this Order. Thus, any such discharge has been and is subject to the specific terms and conditions prescribed in the applicable permit.

16. The Respondent applied for and was issued NPDES Permit No. IN0044776 ("Permit") under Section 402 of the CWA, 33 U.S.C. § 1342, and which became effective on November 1, 2016. At all relevant times, the Respondent was authorized to discharge pollutants from Outfall 001 at the Facility to waters of the United States only in compliance with the specific terms and conditions of the Permit.

17. Part I.A of the Permit establishes effluent limitations and monitoring requirements for ammonia-nitrogen, total suspended solids, total suspended solids percent removal, dissolved oxygen, total residual chlorine, and E.coli.

18. Part I.B of the Permit requires the Respondent to sample and test its effluent and influent and monitor its compliance with permit conditions according to specific procedures, to determine the Facility's compliance or noncompliance with the Permit.

19. Part II.B.1.a. of the Permit requires the Respondent to at all times maintain in good working order and efficiently operate all facilities and systems.

20. Part II.B.2 of the Permit states that bypasses are prohibited unless: (1) the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; (2) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that occurred during normal periods of equipment downtime or preventive maintenance; and (3) the permittee submitted timely notices (orally within 24 hours of event, and written within 5 days of event), as required under Part II.B.2.d; or (4) the condition under Part II.B.2.f of the Permit is met (maintenance-related bypass that does not result in a violation of effluent limitations).

21. Through evaluation of discharge monitoring reports ("DMRs") submitted to IDEM, EPA identified 156 occasions from December 2016 through December 2021, where Respondent discharged pollutants from Outfall 001 that exceeded the applicable effluent limits in the Permit, in violation of Part I.A of the Permit and Section 301(a) of the CWA, 33 U.S.C. § 1311(a). See Attachment A-Table of Effluent Limit Violations.

22. On February 25, 2019, EPA inspected the Facility to evaluate compliance with the CWA. EPA inspectors identified areas of concern, including:

    A. Maintenance-related issues contributing to effluent limit exceedances such as insufficient frequency of maintenance; chronic duckweed control on polishing ponds; insufficient chlorine supply for disinfection treatment; uncovered chlorine contact tank and flow meter vault, allowing debris and solids to enter the effluent waste stream; debris and growth in the clarifier effluent trough; erosion of earth and the presence of sanitary waste

debris around the effluent outfall; and lack of alarm capability to automatically alert the operator or Respondent of treatment system failures.

B. Evidence of a recent sewage overflow at the Facility, including toilet paper on the ground. The path of the overflow debris was observed from a junction box manhole to a polishing pond, bypassing the treatment plant headworks, aeration treatment, and clarifier. The operator-in-charge confirmed that the overflow bypassed primary treatment, the aeration tank and clarifier, and that the overflow occurred "a couple days ago," and "was the first overflow in years," adding that it was the result of a "five-inch rain." The operator-in-charge also confirmed that the overflow was not reported to IDEM. EPA obtained climate records from four of the closest weather stations reporting to the National Weather Service (Alpine, IN, Shelbyville, IN; Dayton, OH; Cincinnati, OH), and the only significant rain event reported at all four stations within the ten-day period prior to the inspection occurred on February 20, 2019. The reported rainfall amount at the four stations for February 20 ranged from 1.07 inches (Shelbyville) to 1.48 inches (Cincinnati). Alpine, IN, the closest station to the Facility (approximately 6 miles), reported 1.21 inches of rain on February 20, 2019. The Alpine station reported 13 days with rainfall exceeding 1.21 inches in the year preceding the inspection, ranging from 1.3 to 2.82 inches.

These areas of concern are described in more detail in the EPA Region 5, *Compliance Evaluation Inspection Report* for the Pleasantview Utilities Wastewater Treatment Plant, dated March 4, 2019, and delivered to Respondent on March 6, 2019.

23. The Respondent has violated Part I.A of the Permit by discharging pollutants, into waters of the United States, in excess of the limitations established in its Permit.

24. The Respondent failed to at all times maintain in good working order and efficiently operate all equipment and systems for the collection and treatment of process wastewater as necessary to achieve compliance with terms and conditions of Part II.B.1.a. of the Permit.

25. The Respondent has violated Part II.B.2 of the Permit by allowing a prohibited bypass on or about February 20, 2019, and failing to submit timely notices as required under Part II.B.2.d of the Permit.

26. Each violation of the conditions of the Permit or regulations described above is a violation of Section 301 of the Act, 33 U.S.C. § 1311.

27. On April 29, 2019, EPA issued an administrative order on consent to the Respondent to address past effluent limit violations at the Pleasantview Utilities Wastewater Treatment Plant.

Compliance Program

28. Based on the foregoing findings and the authority vested in the undersigned Director, Enforcement and Compliance Assurance Division, it is hereby ordered and agreed to in

accordance with Section 309(a) of the CWA, 33 U.S.C. § 1319(a), that Respondent comply with the following actions:

A. Within 90 days of the effective date of this Order, Respondent must complete and submit an Engineering Evaluation of the adequacy of the Facility wastewater treatment components. The Engineering Evaluation must be conducted and certified by a licensed professional engineer with expertise in wastewater treatment, and include the following actions:

   a. Identify the causes of the narrative and numeric effluent limit violations cited above;
   b. Describe the current treatment operations, including detailed diagrams that depict flows to and through the Facility;
   c. Identify existing treatment components, and for each component, determine its adequacy, capacity, age, current condition, and treatment capability, including removal efficiency;
   d. Evaluate adequacy of treatment equipment and operations and determine needs. The determination of equipment needs shall encompass equipment repair, replacement, and addition; and
   e. Evaluate alternatives to on-site wastewater treatment, such as conveying wastewater to a nearby municipal wastewater treatment plant.

B. Within 120 days of the effective date of this Order, Respondent must submit a Corrective Action Plan ("CAP"), for EPA review and approval, describing the specific actions to be taken to address treatment needs and correct the effluent limitation violations specified in Attachment A to this Order. The CAP must include a schedule to complete all work necessary to correct the violations within 180 days of EPA's approval of CAP.

29. Respondent must submit a status report to EPA within 30 days of the end of each calendar-year quarter (i.e., by January 31, April 30, July 31, and October 31), until this Order is terminated. The first status report will be due within 30 days of completion of the first full quarter after the effective date of this Order. Each status report must include: (a) a description of the actions that have been taken toward achieving compliance with this Order during the previous quarter including an assessment of the milestones due, whether they were met, and, if not, what actions taken or planned to meet the milestones, the timeline for meeting those milestones, and any impact on future milestones; (b) an assessment of the effectiveness of such actions in preventing effluent violations; (c) a summary of all effluent violations that occurred during the previous quarter; and (d) an analysis of the cause of each such effluent violation.

30. Final Return to Compliance Report

A. Respondent must ensure that all provisions of this Order have been met by their respective deadlines. Respondent must demonstrate that the Facility

has achieved compliance with this Order. Compliance includes the submission of all reports or other information requested in or pursuant to this Order.

B. Within 210 days of EPA's approval of CAP, or such other date agreed to by EPA, Respondent must submit a final report that outlines its compliance with this Order. This written submission must provide the date, methods, and status of compliance for each provision of this Order.

31. All reports, notifications, documentation, submissions, and other correspondence required to be submitted by this Order must be submitted to EPA electronically, to the extent possible. If electronic submittal is not possible, the submissions must be made by certified mail (return receipt requested). Electronic submissions must be sent to the following addresses: r5weca@epa.gov, maraldo.dean@epa.gov, king.cynthia@epa.gov, and bruark@idem.IN.gov. The subject line of all email correspondence must include the facility name, NPDES ID # IN0044776, and the subject of the deliverable. All electronically-submitted materials must be in final and searchable format, such as Portable Document Format (PDF) with Optical Character Recognition (OCR) applied. Any information containing confidential business information must be submitted and asserted as set forth at 40 C.F.R. Part 2 Subpart B and must be submitted by email to maraldo.dean@epa.gov and king.cynthia@epa.gov or by mail (see below) but not to the r5weca@epa.gov and bruark@idem.IN.gov addresses. Mailed submissions must be sent to the following addresses:

Attn: Dean Maraldo, EPA Case Manager
Water Enforcement & Compliance Assurance Branch (ECW-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Attn: Cynthia King
Office of Regional Counsel (C-14J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

32. EPA may approve, approve with comments, or disapprove submissions pursuant to this Order.

33. Upon EPA approval, submissions by Respondent are incorporated and enforceable as part of this Order. In case of inconsistency between any submission by Respondent and this document and its subsequent modifications, this document and its subsequent modifications shall control.

34. EPA may require additional status reports, or fewer status reports, for the purpose of documenting the progress of the Work performed pursuant to this Order or compliance with

the Permit requirements. Should EPA require additional status reports, EPA will provide Respondent with at least 15 days from the date of EPA's request to submit the reports.

35. All reports, notifications, documentation, and submissions required by this Order must be signed by a duly authorized representative of Respondent as specified by 40 C.F.R. § 122.22(b) and (d) and must include the following statement:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

36. Respondent may not withhold information based on a claim that it is confidential. However, pursuant to 40 C.F.R. Part 2, Subpart B, Respondent may assert a claim of business confidentiality regarding any portion of the information submitted in response to this Order. The manner of asserting such claims is specified in 40 C.F.R. § 2.203(b). Certain information related to effluent data (as defined in 40 C.F.R. § 2.302(a)(2)) and NPDES permit applications may not be entitled to confidential treatment. 40 C.F.R. § 122.7. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If Respondent does not assert a claim of business confidentiality when it submits the information, EPA may make the information available to the public without further notice. 40 C.F.R. § 2.203(c).

37. If Respondent finds at any time after submitting information that any portion of that information is false or incorrect, the signatory must notify EPA immediately. Knowingly submitting false information to EPA may subject Respondent to criminal prosecution under Section 309(c) of the CWA, 33 U.S.C. § 1319(c), as well as 18 U.S.C. § 1001 and 1341.

38. Submissions required by this Order must be deemed submitted on the date they are sent electronically or on the date postmarked if sent by U.S. mail.

39. After review of the submissions required pursuant to paragraphs 28-30 of this Order, EPA may approve or disapprove the submissions, in whole or in part. EPA shall approve the submissions or any portion so long as the submissions fulfill the requirements under this Order.

40. If EPA disapproves the submission(s), EPA will notify Respondent in writing, which may include notice by email, and EPA may require Respondent to supplement or modify its submission(s). Within 30 days following receipt of written notice of EPA's disapproval, Respondent must submit a corrected submission to EPA for approval. In the event that Respondent's modified submission is disapproved in whole or in part by EPA, EPA may

require Respondent to correct the deficiencies or EPA may determine that the submission fails to meet the requirements of this Order.

41. Notwithstanding the receipt of a notice of disapproval pursuant to paragraph 39, above, Respondent must proceed to take all actions and provide all submissions required under this Order, including any actions required under any non-deficient portion(s) of its submission, if such action can be undertaken independent of the deficient portion of Respondent's submission.

42. Absent an extension of time granted in writing by EPA, EPA may determine that late submissions fail to meet the requirements of this Order.

43. EPA may use any information submitted in response to this Order in support of an administrative, civil, or criminal action against Respondent.

44. Information collection under this Order is exempt from the Paperwork Reduction Act under 44 U.S.C. § 3518(c)(1)(B).

General Provisions

45. Respondent consents to the transmission of this Order via e-mail at the following e-mail addresses: msherck@co.fayette.in.us.

46. Respondent has had the opportunity to confer with and submit information to EPA concerning the validity and provisions of this Order.

47. The terms of this Order are binding on Respondent and its assignees and successors. Respondent must give notice of this Order to any successors in interest prior to transferring ownership, and must simultaneously verify to EPA, at the address specified in paragraph 31, that Respondent has given the notice.

48. The undersigned signatory for each party has the authority to bind each respective party to the terms and conditions of this Order.

49. Failure to comply with this Order may subject Respondent to penalties up to $56,460 per day for each violation (or as penalty levels may be later adjusted at 40 C.F.R. Part 19) pursuant to Section 309(d) of the CWA, 33 U.S.C. § 1319(d), and 40 C.F.R. Part 19.

50. This Order does not affect Respondent's responsibility to comply with the CWA, its Permit, and any other local, state, and federal laws, regulations, or permits.

51. This Order does not restrict EPA's authority to enforce the Permit or any section of the CWA or its implementing regulations or to take further enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited in this Order.

52. EPA reserves all rights and remedies, legal and equitable, available to address any violation cited in this Order and any other violation of the CWA or of this Order. Neither issuance of this Order by EPA nor compliance with its terms precludes further enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited in this Order, for any other violations of the CWA or of this Order committed by Respondent.

53. The CWA includes provisions for administrative penalties, for civil injunctive relief and penalties, and for criminal penalties for violations of the CWA. Specifically, EPA may:

    A. assess civil administrative penalties under 33 U.S.C. § 1319(g) and 40 C.F.R. Part 19 of up to $22,584 per day of violation for violations of the CWA that occurred after November 2, 2015 and for which penalties are assessed on or after December 23, 2020, for up to a total of $282,293, or other amounts as penalty levels may be later adjusted at 40 C.F.R. Part 19;

    B. seek civil injunctive relief and penalties for violations of the CWA under 33 U.S.C. § 1319(b) and civil judicial penalties for violations of this Order under 33 U.S.C. § 1319(d). In accordance with 40 C.F.R. Part 19, EPA may seek civil judicial penalties of up to $56,460 per day of violation for violations that occurred after November 2, 2015 and for which penalties are assessed on or after December 23, 2020, or as penalty levels may be later adjusted at 40 C.F.R. Part 19; and

    C. seek criminal penalties, including fines and imprisonment, for negligent or knowing violations of the CWA under 33 U.S.C. § 1319(c).

54. For purposes of the identification requirement in Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), and 26 C.F.R. § 162-21(b)(2), performance of work described in paragraph 28 is restitution, remediation, or required to come into compliance with the law.

55. This Order shall become effective upon signature by EPA below and will remain in effect until EPA has notified Respondent of termination of the Order pursuant to paragraphs 59 or 60.

56. The April 29, 2019, administrative consent order is terminated upon the effective date of this Order.

57. By entering into this Order, Respondent: (1) consents to EPA's authority to issue this Order; (2) neither admits nor denies the factual allegations as set forth in this Order; (3) agrees to undertake all actions required by the terms and conditions of this Order; (4) agrees not to contest the authority of EPA to issue this Order or the validity of any terms or conditions in this Order; and (5) waives otherwise available rights to judicial review of this Order under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

58. This Order may be modified by written agreement of the parties and with notice to the

primary enforcement authority, if applicable.

59. EPA may terminate this Order at any time by written notice to Respondent.

60. Absent the notice described in paragraph 59, and after completing all conditions of this Order and attaining compliance with the applicable requirements of the CWA, Respondent may request in writing that EPA terminate this Order. With this request for termination, Respondent must submit the Final Return to Compliance Report set forth at paragraph 30 and certify that there are no further outstanding measures required under this Order. In response to the request for termination and Final Return to Compliance Report, the EPA may require additional information, actions, or evidence from Respondent to show compliance with this Order and the CWA; EPA may pursue appropriate administrative or judicial action to achieve compliance; or EPA may accept the request for termination and Final Return to Compliance Report. Upon EPA's written acceptance of the request for termination or the written review and approval of the compliance report, this Order will terminate.

IT IS SO AGREED AND ORDERED:

FOR RESPONDENT, PLEASANTVIEW UTILITIES, INC.:

Signature _____ Date 1/7/2022

Matthew Sherck
Name

President
Title

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY:

MICHAEL HARRIS Digitally signed by MICHAEL HARRIS Date: 2022.01.28 08:43:38 -06'00'

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division
U.S. EPA Region 5

Date

Undated
File date is 08/24/2022

Pleasantview Utilities, Inc. Corrective Action Plan

The goal of this CAP is to eliminate effluent limit violations

1) Hire new operator for treatment plant
    a. Turn in reports on due dates
    b. Maintain required records
2) Hire assistant to check plant
    a. Monitor treatment plant daily for
        i. Optimize airflow
        ii. Clean and maintain skimmer
        iii. Clean and maintain clarifier
    b. Optimize bubbler in chlorine contact tank
        i. Add fine air bubblers
        ii. Clean and maintain chlorine contact tank
3) Replace chlorine and de-chlor system with liquid system
    a. Monitor daily

Pleasantview Utilities

3812 W Galaxy Drive, Connersville, IN 47331
(765) 309-2973

Tuesday, October 29, 2024

Ellie Demilt
Life Scientist
U.S. Environmental Protection Agency, Region 5
WECAB Section 2
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Pleasantview Utilities, Inc. Status Report

To Whom It May Concern:

Pleasantview Utilities continues to operate to meet requirements of agreed order and to meet effluent requirements if IDEM. A new operator has been hired at the treatment plant. The new operator is Michael Stuckey with MS Waters. MS Waters is improving the plant by making sure the plant is operating efficiently. They are working closely with myself and hired contractors to improve plant operations. Updates include additional aeration lines, extended sludge return lines and extra maintenance. The contact tank was cleaned to allow better aeration and chlorination. Regular maintenance and visits keep the plant operating to meet permit requirements.

We are currently in process of doing a rate increase with the IURC. We have included extra funds in the revenue requirements for extra labor at the treatment plant to increase operations.

In an effort to keep from going over our ammonia requirements we have contracted with an engineer, Stephen Fralish, we believe that if we modify the permit to add aeration to the polishing ponds, this will eliminate our ammonia violations. Because of his schedule, he stated that January would be the earliest he could get started.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Matt Sherck
President, Pleasant View Utilities, Inc.
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