

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**JOINT PETITION OF HOWARD COUNTY)
UTILITIES, INC. (“SELLER”), AND)
GREEN ACRES SUBDIVISION SEWER SYSTEM,)
INC. (“PURCHASER”) FOR: (A))
APPROVAL OF THE TRANSFER OF SELLER’S)
FRANCHISE, WORKS, SYSTEM,)
AND CERTIFICATE OF TERRITORIAL)
AUTHORITY TO PURCHASER PURSUANT)
TO AN AGREEMENT FOR ACQUISITION OF)
ASSETS; (B) APPROVAL OF RATES)
THAT PURCHASER MAY CHARGE UPON)
CLOSING THE ACQUISITION; AND (C))
AUTHORITY FOR PURCHASER TO ISSUE)
BONDS, NOTES, OR OTHER OBLIGATIONS,)
INCLUDING A MORTGAGE ENCUMBRANCE)
THEREON.)**

CAUSE NO. 45360

TESTIMONY OF

JAMES T. PARKS – PUBLIC’S EXHIBIT NO. 3

ON BEHALF OF

THE INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

JULY 22, 2020

Respectfully Submitted,



Daniel M. Le Vay, Atty. No. 22184-49
Deputy Consumer Counselor
Scott Franson, Atty. No. 27839-49
Deputy Consumer Counselor
115 W. Washington St., Ste 1500 South
Indianapolis, IN 45204

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Office of Utility Consumer Counselor's Testimony of James T. Parks* has been served upon the following counsel of record in the captioned proceeding by electronic service on July 22, 2020.

Nicholas K. Kile
Hillary J. Close
Lauren M. Box
BARNES & THORNBURG LLP
11 South Meridian Street
Indianapolis, Indiana 46204
Email: nicholas.kile@btlaw.com
hillary.close@btlaw.com
lauren.box@btlaw.com

Marcus Misinec
**BAYLIFF, HARRIGAN, CORD,
MAUGANS, &
COX P.C.**
319 North Main Street
P.O. Box 2249
Kokomo, Indiana 46904
Email: marcus.misinec@bhcmlaw.com



Daniel M. Le Vay
Deputy Consumer Counselor
Scott Franson
Deputy Consumer Counselor

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR
115 West Washington Street
Suite 1500 South
Indianapolis, IN 46204
infomgt@oucc.in.gov
317/232-2494 – Phone
317/232-5923 – Facsimile

TESTIMONY OF OUCC WITNESS JAMES T. PARKS
CAUSE NO. 45360
HOWARD COUNTY UTILITIES, INC. AND GREEN ACRES SUBDIVISION SEWER
SYSTEM, INC.

1 **Q: Please state your name and business address.**

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

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

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

8 **Q: What relief do the Joint Petitioners seek in this Cause?**

9 A: Joint Petitioners seek the following:

10 (a) Commission approval of the transfer of Howard County Utilities, Inc.'s ("HCU" or
11 "Seller") franchise, works, system, and Certificate of Territorial Authority ("CTA") to
12 Green Acres Subdivision Sewer System, Inc. ("Green Acres," "GASSS" or "Purchaser")
13 pursuant to the Agreement for Acquisition of Assets and the Amendment to the Agreement;

14 (b) Commission approval of rates that GASSS may charge upon closing the acquisition
15 which would be \$151.47 per month compared to the current \$69 per month charge; and

16 (c) Commission authority for GASSS to issue \$2.2 million in bonds, notes, or other
17 obligations, with such debt secured by a mortgage on the utility assets and the golf course.

18 **Q: What is the purpose of your testimony?**

19 A: The purpose of my testimony is to provide a review of costs and the appraised value of the
20 HCU wastewater system as they relate to the sale of the utility assets. I recommend that

1 the Commission approve the transfer but explain that the \$2,022,000 purchase price should
2 not be considered the utility's rate base in this or for purposes of any future sale of the
3 utility assets. I also discuss the age of the sewer system and the existing levels of
4 infiltration and inflow ("I&I") that the new utility owners will need to address as part of a
5 long term periodic maintenance and replacement program. I support Green Acres' request
6 to include \$54,000 as an annual revenue requirement for extensions and replacements and
7 recommend this money be placed in a restricted account for use only on capital
8 improvement projects of the wastewater utility. I recommend GASSS obtain existing HCU
9 utility records, prepare an asset management plan to guide its decision making on capital
10 improvements, sludge disposal, and immediate maintenance needs. Finally, if I do not
11 otherwise discuss matters raised by HCU or Green Acres in their case, my silence should
12 not be interpreted as implied agreement with HCU's or Green Acres' positions or
13 assertions.

14 **Q: What did you do to prepare your testimony and form your opinions?**

15 A: I reviewed Joint Petitioners' case-in-chief, filed on March 23, 2020, for the sale and transfer
16 of the utility including the Direct Testimonies and Attachments of Scott L. Lods, HCU's
17 President, Chuck Lewis, Secretary of the Green Acres Subdivision Home Owner's
18 Association ("HOA"), Steven K. Brock, financial consultant and municipal advisor with
19 Therber, Brock & Associates, LLC; and appraiser Judith Cleland, professional engineer.

20 I toured HCU's wastewater facilities on November 6, 2019 along with Marcus
21 Turner of the IURC and the OUCC's Carla Sullivan and attended the Public Field Hearing.¹

¹ The Public Field Hearing under Cause No.45283-U was held at the Green Acres Golf Club's clubhouse on November 6, 2019. The rate case was stayed on November 7, 2019 due to the pending sale of utility assets to Green Acres.

1 I reviewed prior Commission Orders for the Green Acres Sanitation Company and Howard
2 County Utilities regarding HCU's wastewater collection and treatment system. I reviewed
3 facility information and Monthly Reports of Operation ("MROs") submitted to the Indiana
4 Department of Environmental Management ("IDEM").² I wrote data requests and
5 reviewed Joint Petitioner's responses, including reviews of HCU's design drawings for the
6 influent sewer and treatment plant that were placed in service in 2011.

7 **Q: Please briefly describe HCU and its wastewater facilities.**

8 A: HCU is an investor owned Class C Wastewater Utility, and it currently provides sewage
9 services to approximately 211 private family homes and one commercial customer, the
10 Green Acres Golf Club, in the rural area along Wildcat Creek in Howard County, west of
11 Kokomo, Indiana. HCU operates a Class II, 200,000 gallons per day ("gpd") extended
12 aeration wastewater treatment facility consisting of an influent pump station, comminutor,
13 flow equalization (surge tank and pumps), two aeration basins, two final clarifiers,
14 ultraviolet light ("UV") disinfection, post aeration, flow measurement, effluent sewer, a
15 sludge digestion / holding tank, plant equipment, a blower building, a control building, site
16 electrical and various related appurtenances and facilities. Solids are digested and stored in
17 a sludge holding tank. A more complete history of the HCU system is in Appendix C.

I. WASTEWATER UTILITY VALUATION

18 **Q: Please describe the valuation done for the transfer of the utility.**

19 A: Joint Petitioner's witness Judith Cleland included a draft Preliminary Engineering Report
20 ("PER") for the Wastewater Utility acquisition, dated February 2020. I understand the

² IDEM Virtual File Cabinet available at <https://vfc.idem.in.gov/DocumentSearch.aspx?xAIID=109161>.

1 PER was part of the application process for Green Acres to obtain a 90% loan guarantee
2 from the USDA-RD to a private bank loan for the asset purchase.³ The PER included a
3 one page Wastewater Utility Valuation in Appendix D. The valuation was based on
4 Replacement Cost New Less Depreciation (“RCNLD”) methodology for a 2019 Valuation
5 Year but no other information to support the valuation such as individual cost components,
6 equipment vendor quotes, material invoices (for pipe, manholes, reinforcing steel, heavy
7 equipment rental, etc.) was provided in Joint Petitioners’ case-in-chief.

8 Ms. Cleland toured the wastewater facilities on two occasions - March 7, 2016 and
9 again on May 31, 2019. Information provided to Ms. Cleland by HCU is included in
10 Attachments JTP-1:

- 11 1. Sewer Maps (included with HCU’s response to DR 1-6) and provided in
12 Attachment JTP-2. These are the poor quality maps that are not sewer design
13 drawings but are reportedly the only sewer maps available from HCU for the
14 original collection system.
- 15 2. HCU’s June 1, 2011 True-up report⁴
- 16 3. HCU responses to the June 15, 2011 IURC Docket Entry, dated June 27, 2011⁵
- 17 4. Site visit photos from March 7, 2016 and May 31, 2019
- 18 5. Undated Atlas Excavating Sewer Quote
- 19 6. Three emails from ASU Accounting regarding the sewer work

³ USDA-RD stands for the United States Department of Agriculture, Rural development program.

⁴ Cause No. 43294, HCU True-up Report, June 1, 2011

⁵ Cause No. 43294, HCU response to the IURC’s June 15, 2011 Docket Entry, dated June 27, 2011

1 **Q: Why did Ms. Cleland use an RCNLD valuation rather than an Original Cost**
2 **valuation?**

3 A: Ms. Cleland did not say. Because the HCU-2 treatment plant, influent pump station and
4 influent sewer are all less than ten years old, the original cost approach to valuation would
5 have been an accurate approach based on known construction costs.

6 **Q: Do you have concerns about the RCNLD estimate?**

7 A: Yes. Several of the construction costs appear to be too high, particularly for the concrete
8 costs, the influent sewer, and the percentage allowances for mobilization / demobilization
9 and non-construction. Ms. Cleland estimated a \$600 per cubic yard concrete cost
10 regardless of whether the concrete is in a wall or a tank bottom slab. Costs vary
11 considerably depending on where the concrete is placed. Bottom slab concrete has the
12 lowest cost because it requires minimal forming and bracing. In addition, HCU used a
13 thicker bottom slab design containing a greater volume of lower cost concrete relative to
14 the reinforcing steel.⁶ The appraiser's concrete costs per cubic yard are significantly above
15 the National Average costs presented in the Heavy Construction Cost Data book, 2019
16 Edition.⁷ For concrete walls the appraiser's assumed cost is 20% higher than the OUCC
17 calculated RSMeans' cost. For the concrete bottom slab, the appraiser's costs per cubic
18 yard placed is three times the RSMeans' cost.

19 **Q: Can you summarize the differences in the estimated concrete costs between the**
20 **appraiser and the OUCC calculations based on costs in the RSMeans Manual?**

21 A Yes. Table 3 compares cost components between the appraiser's 2019 estimated \$600 per

⁶ Under Cause No. 45283-U, HCU provided design drawings (but not Record Drawings) for the new influent sewer, influent pump station and 200,000 gallons per day ("gpd") relocated treatment plant. The design drawings show a two feet thick bottom slab.

⁷ The *Heavy Construction Costs with RSMeans data*, 2019 33rd Annual Edition (catalog No. 60169) is published by The Gordian Group Inc., Rockland, MA (commonly referred to as the "RSMeans Manual").

1 cubic yard (“CY”) price⁸ and the OUCC calculations using the 2019 RSMeans Manual
 2 prices for walls and slabs.

Table 3 – Comparison of Estimated Concrete Costs

Cost Component	OUCC Estimated Cost based on 2019 RS Means Unit Costs (\$/CY)⁹	Appraiser's 2019 Estimated Unit Cost (\$/CY)
Concrete Walls (24 feet tall and 15-inches thick)		
Materials	\$180.00	Not reported
Labor	\$188.00	Not reported
Equipment	\$16.00	Not reported
Overhead & Profit (30%)	\$115.00	Not reported
Estimated Cost per - Installed Cubic Yard	\$500.00 (rounded up)	\$600.00
Concrete Bottom Slab (2 feet thick)		
Material	\$125	Not reported
Labor	\$39	Not reported
Equipment	0.25	Not reported
Overhead & Profit (21%)	\$34.50	Not reported
Estimated Cost per - Installed Cubic Yard	\$200 (rounded up)	\$600.00

3 **Q: Does the RSMeans Manual list costs for a 24 feet tall, 15-inch thick wall and a two**
 4 **feet thick slab?**

5 **A:** No. However, RS Means does list costs for a 15-inch thick, 18 feet tall wall and a 6-inch
 6 thick slab. I increased costs to account for more reinforcing steel that would be required
 7 and for the added labor and bracing for taller walls. For the walls I added 10% to the RS

⁸ See Joint Petitioner's Direct Testimony of Judy Cleland, P.E., Attachment JC-1, page 40.

⁹ Cost shown have been adjusted for the taller and thicker walls HCU designed and for a Kokomo, IN City Cost Index of 85.5 % of the National Average for concrete per the Heavy Construction Cost Data, 2019 Ed. by RS Means

1 Means prices, but for the two feet slab I applied the RSMeans 6-inch slab prices, which
 2 should be more expensive by volume.

3 **Q: Did you review concrete volumes and costs listed in the appraisal versus concrete**
 4 **quantities based on the design?**

5 A: Yes. I calculated concrete volumes and costs and compared them to those listed by the
 6 appraiser in Table 4. See Attachment JTP-3 for concrete cost calculations.

Table 4 – Comparison of Concrete Quantities and Costs

Component	Qty (CY)	Estimated Unit Cost (\$/CY)	Amount	Total Amount
Appraiser Estimate				
Treatment Tank Walls	NA	\$600.00		
Treatment Tank Slab	NA	\$600.00		
Treatment Tank Total	880	\$600.00	\$528,000	
Influent Pump Station	114	\$600.00	\$68,400	
Appraiser's Total	994	\$600.00		\$596,400
OUCG Calculation				
Treatment Tank Walls	561	\$500.00	\$280,500.00	
Treatment Tank Slab	410	\$200.00	\$82,000.00	
Clarifier Fillets	129	\$180.00	\$23,220.00	
Pump Station Slabs	27	\$200.00	\$5,400.00	
Pump Station Walls	84	\$500.00	\$42,000.00	
OUCG Total	1,211	\$357.65		\$433,120
Cost Difference				(\$163,280)

7 Concrete is one of the largest cost items accounting for 29% of the RCNLD construction

1 costs.¹⁰ Based on material take-offs from HCU's design drawings, I calculated concrete
2 wall and bottom slab volumes for the treatment tanks and the influent pump station.¹¹ I
3 could not come up with the same concrete volumes listed in the Valuation. I calculate that
4 concrete volumes are undercounted and the concrete costs are overstated by \$163,280 in
5 the appraiser's Valuation.

6 **Q: How did the appraiser determine the influent sewer cost?**

7 A: Ms. Cleland did not identify the source of the Valuation's unit costs. Based on HCU's
8 response to discovery, it appears the appraiser used the \$179,640 dewatering cost taken
9 directly from the Atlas Excavating quote for dewatering with deep well points.¹² Neither
10 HCU nor the appraiser provided evidence that Atlas Excavating actually installed the
11 influent sewer. More importantly, there is no evidence in the case-in-chief that dewatering
12 with deep well points was used. HCU and the appraiser provided no construction
13 photographs or construction inspection reports to prove that costs for deep well points
14 dewatering is appropriate to establish costs for the influent sewer. Furthermore, dewatering
15 with deep well points would have required permitting through the Indiana Department of
16 Natural Resources because of the large volumes of groundwater that would be involved
17 and the effect on Wildcat Creek.

¹⁰ Calculated by the OUCC based on the RCNLD costs presented in the appraiser's Valuation (page 40) as the sum of \$61,104 in concrete costs for the Influent Pump Station plus \$471,680 for concrete for the treatment tanks divided by total construction costs of \$1,809,597 equals 29%. For the analysis, costs for WWTP property, inventory, mobilization, demobilization, bonds, and non-construction were not included.

¹¹ Drawings provided with HCU's June 27, 2011 Docket Entry response show that the bottom slab for the treatment tanks was not a uniform two feet thick as shown on the design drawings provided in Cause No. 45283-U, HCU's response to DR 2-3. HCU should clarify which design it actually constructed.

¹² Calculated by the appraiser as 1,996 lineal feet of influent sewer times \$90 per foot for dewatering using deep well points. See page 40 of Attachment JC-1 to the Direct Testimony of Judith Cleland.

1 **Q: What were the estimated costs for the influent sewer?**

2 A: Estimated influent sewer costs have increased substantially from the original 2007 \$30,500
3 cost estimate for a 1,000 feet 8-inch sewer extension to over \$500,000 in the appraiser's
4 Valuation.¹³ Influent sewer costs have grown as summarized in Table 5.

Table 5 – Influent Sewer Cost Variations

Est. No	Date	Description	Amount	Source
1	9/14/07	1,000 LF 8" PVC SDR 35 sewer on North side of Wildcat Creek	\$30,500	43294, Preapproval Cost Est. Serowka Direct Exhibit EJS-4
2	9/15/08	1,700 LF 8" PVC SDR 35 sewer on North side of Wildcat Creek	\$198,090	43294, True-up Report, June 1, 2011
3	10/28/08	Influent and Effluent Sewer (not described further)	\$198,000	43294, HWC Engineers Estimate
4	undated	1,996 LF of 10", 12", 15", and 24" PVC sewer, 7 Manholes and dewatering with sewer pipe and MHs provided by FTDC	\$471,902	Atlas Excavating quote plus FTDC Materials, ASU Accounting emails to appraiser
5	10/04/19	Asset Class 361 – 15" PVC SDR 35 sewer (1,700 LF) & 5 Manholes	\$218,899	45283-U, HCU response to DR 2-9
5	Feb, 2020	1,743 LF of 12", 15", and 24" PVC sewer, 7 Manholes and dewatering	\$453,482	Cleland Valuation Attachment JC-1, page 40

5 **Q: Are the costs to construct the influent sewer inflated?**

6 A: Yes. The appraiser's use of the dewatering cost provided in Atlas Excavating's quote
7 accounted for \$179,640 or nearly 40% of the \$453,482 influent sewer's total cost. I
8 estimate that dewatering costs are over \$140,000 too high and instead of being based on

¹³ Based on also including the percentage mark-ups for mobilization / demobilization, bonds, and non-construction costs.

1 deep well points should instead be based on using portable trash pumps set up to pump
 2 groundwater from the active trench length and then moved as sewer installation progresses.
 3 This is similar to the dewatering method (portable pumps) used by FTDC to install the
 4 12,089 foot long Big 3 sewer for American Suburban Utilities, Inc. in 2015 under Cause
 5 No. 44676. In that case, the Commission allowed \$100,000 to be included in rate base for
 6 dewatering or \$8.27 per lineal foot of sewer.¹⁴

7 **Q: Did you find errors in Preliminary Engineering Report that may have affected the**
 8 **valuation?**

9 A: Yes. There are several errors in the PER regarding HCU's wastewater system. Some of
 10 these errors include the following:

PER Error	OUCC Correction	Data Source
Sanitary Sewers include 24-inch - 77 feet	The design drawings do not show any 24-inch sewers	HCU-2 design drawings provided in response to 45283-U DR 2-3 and Influent Sewer design drawings by TBird provided in response to DR 1-6.
Influent Pump Station includes two Inline Grinders, 600 gpm	Only one inline grinder is installed	Attachment JC-1 (Cleveland Direct Testimony), p. 40 shows only one grinder
The Valuation lists a laboratory valued at \$20,000	HCU-2 has a break / locker room instead of a laboratory.	Site visit photographs in the PER

11 **Q: Is it your position that the transaction should not be authorized?**

12 A: No. The focus of my testimony with respect to value is whether the purchase price of \$2.2
 13 million should be considered the fair value of the used and useful property. For the reasons
 14 included in my testimony, I do not believe such a finding is warranted. As discussed

¹⁴ The Commission disallowed \$980,448 of ASU's \$1,080,448 in claimed dewatering costs because ASU was unable to show the costs were actually incurred. See the Commission's findings regarding disallowance of dewatering costs in the Cause No. 44676 Final Order, dated November 30, 2016 on pages 27-28.

1 somewhat in my testimony including Appendix C, the full reported costs of completing the
2 2011 improvements have not been vetted through a base rate case. Nonetheless, while the
3 OUCC agrees that the proposed transaction should be approved, it does not agree that any
4 fair value rate base determination need be made or should be made at this time. Since
5 Green Acres will be a not for profit utility, a return on rate base is not a revenue
6 requirement. However, should Green Acres sell the utility to an investor owned utility in
7 the future, the rate base issue can be and should be addressed at that time.

II. ISSUES THAT GASSS WILL NEED TO ADDRESS

8 **Q: Have you identified items that the new utility owners should be aware of and address?**

9 A: Yes. GASSS should obtain Record Drawings of the assets from Mr. Lods, create an Asset
10 Management Plan ("AMP") and program, implement a regular sewer cleaning and
11 televising program, set up a restricted account for extensions and replacements, set up off-
12 site sludge disposal, develop and implement a maintenance program to arrest the metal
13 rusting issue, permit and include costs for the Clubhouse groundwater well system, and
14 resolve property issues and site access.

15 **Q: Does HCU have Record Drawings showing the 2011 improvements it constructed?**

16 A: No. In response to discovery, HCU stated it did not have field mark-ups of design drawings
17 and did not have Record Drawings.¹⁵ HCU is to turn over its records to GASS under
18 Section 4.4 of the Asset Purchase Agreement which reads as follows:

19 4.4 Records, Plans And Financial Statements At the closing, Seller shall deliver
20 to Purchaser, to the extent such documents exist, copies of Seller's System
21 customer lists and addresses, technical information, collection system maps,
22 valve records, monthly reports submitted to state agencies, maintenance records

¹⁵ Cause No. 45283-U, HCU response to DR 2-4. See Attachment JTP-4.

1 on all mains, and all other records and documents relating to the Seller's
2 System.

3 I recommend that the Commission require HCU as a condition of the transfer to create
4 Record Drawings for the 2011 improvements for submittal to the new utility owners. These
5 drawings should have been procured by HCU to document what it actually constructed.
6 Mr. Lods and HCU is in the best position to prepare the Record Drawings as Mr. Lods and
7 HCU should have all of the design drawings, permits, equipment records, shop drawings,
8 and field changes.

9 **Q: Has Green Acres included an extensions and replacement (“E&R”) budget?**

10 A: Yes. Green Acres has requested that \$54,000 be included in the revenue requirement to
11 fund extensions and replacements of utility assets. As a not-for-profit utility, GASSS is
12 authorized to include E&R as a revenue requirement, not depreciation expense.
13 Nonetheless, GASSS does not have an E&R plan and based its E&R revenue requirement
14 on depreciation expense as proxy. I agree Green Acres will need funds for E&R and that
15 \$54,000 is an acceptable level of funding. However, as GASSS does not yet have a plan
16 for E&R projects, I recommend that the E&R funds be placed in a restricted account for
17 use only on wastewater utility extensions and replacements.

18 **Q: Does HCU have a sludge disposal permit and program?**

19 A: I could not find any record of actual sludge disposal permitting or off-site disposal. It
20 appears the sludge holding / digestion tank is oversized and has been filling with digested
21 sludge over the last nine years. The appraiser reports the holding tank has capacity to hold
22 sludge for 400 days but this is based on overestimated pollutant loadings. Actual storage
23 capacity could be much higher. In Cause No. 43294, HCU projected a yearly cost of
24 \$6,552.48 to dispose of 45,000 gallons of digested sludge (Serowka Direct, Exhibit EJS-5,

1 09/19/2007). IDEM inspection reports note that sludge is not being removed. *See*
2 Attachment JTP-5. I reviewed Monthly Reports of Operations (“MROs”) for the 2007 to
3 2010 period when 87,700 gallons of digested sludge was disposed off-site. Based on
4 25,000 gallons per year and a \$0.12 per gallon disposal cost, I recommend including \$3,000
5 for the annual sludge disposal expense.

6 **Q: Does the HCU-2 treatment plant have an on-site laboratory?**

7 A: No. All lab tests except pH are being done at a contract laboratory according to the IDEM
8 inspections reports. The off-site labs include the Richard Kain lab in Jonesboro, IN and
9 the Chrysler lab in Kokomo, IN. IDEM reported that analyses for pH is performed on-site
10 with all other parameters of the permit being performed at the contract labs. Nonetheless,
11 an on-site laboratory is listed in the Valuation.

12 **Q: Has HCU televised the sewer system?**

13 A: When it sought authority to acquire these assets in Cause No. 43294, HCU agreed to clean
14 and televise the sewer system in a three year period. HCU should be required to provide
15 GASSS all televising records and sewer records that HCU may have created regarding
16 infiltration and inflow. However, HCU reported that it does not have I&I studies or
17 estimates of I&I.¹⁶ I recommend that the Commission require that HCU prepare a list of
18 all sewer records it has that will be provided to GASSS.

19 **Q: Does HCU have an asset management plan?**

20 A: Although I have not reviewed HCU's asset management plan, in its IURC Annual reports
21 HCU indicated it has an asset management plan. HCU should provide its asset
22 management plan and all corresponding documentation to GASSS for its use in preparing

¹⁶ Cause No. 45283-U, HCU responses to DR 5-4 and 5-5. *See* Attachment JTP-4.

1 its own asset management plan.

2 **Q: Is HCU including the parcel on which the HCU-2 treatment plant is located in the**
3 **asset transfer?**

4 A: Yes. But HCU is only transferring three of the parcel's 18.53 acres to GASSS per the
5 Agreement, Article 1, definitions (Seller's system) on page 2.

6 "Seller's System" - The Seller's plant and equipment that is used and useful in
7 the provision of sewage treatment and disposal service by the Seller. The
8 Seller's System shall include but is not necessarily limited to all valves and
9 appurtenances, pumps, treatment plants, mains, lift stations, service lines and
10 laterals, leases, licenses, easements, permits, accounts receivable that are due
11 and outstanding as of the Closing, and all other assets which are part of the
12 sewage treatment and disposal system used by the Seller to provide sewer
13 service to customers within Howard County, excluding liabilities contingent or
14 otherwise. The Seller's System shall also include approximately three (3) acres
15 of real estate upon which the Seller's treatment is located and is operated, but
16 shall not include the remainder of the parcel of which said three (3) acres is a
17 part. The Seller's System shall not include: (a) liabilities, contingent or
18 otherwise, and (b) Customer Service Connections (as defined herein) which are
19 and shall remain the property of customers.

20 There are several matters with respect to the transfer of land associated with the HCU-2
21 treatment plant and the access road to the plant that need to be addressed. Joint Petitioners
22 have not provided a parcel map of the three acres that will be transferred and have not
23 identified which existing parcel the HCU-2 plant sits on. From property records, it appears
24 the parcels for the treatment plant and access road are not owned by HCU but by HCU's
25 President, Scott L. Lods. In addition, the treatment plant access road appears to be on a
26 separate parcel that is not being transferred. GASSS may need to obtain from Mr. Lods a
27 permanent easement to the deed of the three acre parcel. The permanent easement is
28 needed to access the parcel because it is landlocked. Another issue that will need to be
29 resolved is clarifying who will be responsible for maintaining the gravel access road so that
30 it remains passable. I recommend that the Commission order HCU and GASSS to identify

1 and resolve the issues with GASSS's purchase of only three of the 18.53 acres. *See*
2 Attachment JTP-6 for the property maps and records including the Property Record Cards
3 for the HCU-2 treatment plant and access road parcels.

4 **Q: Does HCU have deferred maintenance needs?**

5 A: Yes. The coatings are failing on numerous metal surfaces throughout the wastewater plant,
6 leading to rust as shown on the Flow Splitter structure shown in Figure 1.

Figure 1 – Coating failure and metal corrosion on the Flow Splitter Structure



7 Green Acres will need to develop and implement a painting program to remove the existing
8 rust and corrosion, replace metal as needed, and recoat all painted metal components in the
9 plant (stairs, bridge, piping, handrails, splitter structure, etc.).

1 HCU also has unchecked gully erosion on the north slope of the plant site that has
2 undermined the ground beneath the fence. Trespassers can easily enter the site by crawling
3 through the eroded opening. I recommend that the Commission require HCU to correct
4 the erosion problem by filling in the eroded gullies and reseeding to establish cover
5 vegetation. Figure 2 shows the existing gully erosion.

Figure 2 – Erosion under the property fence



1 **Q: Should GASSS as the new owner monitor and investigate the effluent flow meter and**
2 **sources of the higher flows reaching the treatment plant?**

3 A: Yes. HCU's reported maximum day flows exceed design and annual average flows have
4 increased without adding customers. Average flow over the last 5-years is at 75% of
5 design. IDEM inspection reports point out HCU's excessive I&I and note average monthly
6 flows regularly exceed the 200,000 design average flow.¹⁷ Annual average flows reported
7 to IDEM more than doubled after the replacement treatment plant came on-line in 2011.
8 This is either due to: 1) increasing I&I (calibrated flow meter readings are accurate); 2)
9 original plant meter readings were low; or 3) the new plant's flow meter is inaccurately
10 registering higher flows. If both sets of flow readings (original and new plant) are accurate,
11 then I&I has increased. I recommend the new owners investigate the effluent flow meter
12 readings to determine if reported flows are erroneously high or actually occurring. If flows
13 are accurate, then the new owners should focus on finding and removing I&I sources.

III. RECOMMENDATIONS

14 **Q: Please summarize your recommendations.**

15 A: I recommend the following:

- 16 1. Commission approve the transfer of the Howard County Utilities, Inc.'s franchise,
17 works, system, and Certificate of Territorial Authority ("CTA") to Green Acres
18 Subdivision Sewer System, Inc.

¹⁷ See Attachment JTP-5 for IDEM inspection reports and HCU responses.

- 1 2. I recommend the Commission not establish in this Cause any finding that purports
2 to equate the value of this utility's used and useful plant with the agreed purchase
3 price.
- 4 3. I recommend the Commission approve Green Acres' request to include \$54,000 as
5 an annual revenue requirement for extensions and replacements and that this money
6 should be placed in a restricted account for use only on capital improvement
7 projects of the wastewater utility.
- 8 4. I recommend that Green Acres budget for emergency sewer repairs, regular sewer
9 cleaning and televising, and sewer and manhole repairs and replacements.
- 10 5. I recommend Green Acres investigate the effluent flow meter readings to determine
11 if reported flows are erroneously high or actually occurring. If effluent flows are
12 accurate, then Green Acres should focus on finding and removing I&I sources.
- 13 6. I recommend the Commission require HCU to create Record Drawings for the 2011
14 improvements for submittal to Green Acres.
- 15 7. I recommend the Commission require that HCU prepare a list of all sewer records
16 it has that will be provided to Green Acres.
- 17 8. I recommend HCU provide the Asset Management Plan and all corresponding
18 documentation to Green Acres for their use in creating an asset management plan
19 for their operations.
- 20 9. I recommend Green Acres develop, implement, and permit a regular program of
21 off-site sludge disposal.
- 22 10. I recommend Green Acres develop and implement a maintenance program to paint
23 all rusted and corroded metal within the treatment plant.

1 11. I recommend that Joint Petitioners include a parcel map and property description
2 of the three acres that will be transferred to Green Acres.

3 12. I recommend Green Acres obtain and record its property interest in the three acre
4 parcel for a permanent access road to the treatment plant.

5 13. I recommend that the Commission order HCU to correct the erosion problem before
6 the transfer is made by filling in eroded gullies and reseeding to establish cover
7 vegetation.

8 **Q: Does this conclude your testimony?**

9 **A: Yes.**

Appendix A

1 **Q: Please describe your educational background and experience.**

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

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

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

21 **Q: Have you previously testified before the Commission?**

22 A: Yes.

Appendix B

List of Attachments

- | | |
|------------------|--|
| Attachment JTP-1 | HCU information provided to Judith Cleland for use in preparation of the PER and appraisal |
| Attachment JTP-2 | Sewers maps provided in response to DR 1-6 |
| Attachment JTP-3 | OUCC Concrete Cost Calculations |
| Attachment JTP-4 | HCU responses to OUCC Data Requests under Cause No. 45283-U |
| Attachment JTP-5 | IDEM Inspection reports and HCU responses |
| Attachment JTP-6 | Property maps and Property Record Cards for the HCU-2 wastewater treatment plant and access road. |
| Attachment JTP-7 | HCU's February 4, 2015 notification letter and IDEM's February 13, 2015 water system inactivation letter |
| Attachment JTP-8 | 2009 Design Summary for the HCU-2 wastewater treatment plant |

Appendix C
System History

1 **Q: Please provide an overview of HCU's acquisition of the Green Acres Sanitation**
2 **Company, Inc.'s system.**

3 A: On April 21, 2008¹⁸ per the Commission's Final Order in Cause No. 43294 and a purchase
4 agreement, HCU acquired the franchise, works, wastewater system, and CTA from Green
5 Acres Sanitation Company, Inc..¹⁹ Green Acres Sanitation Company, Inc. no longer exists
6 but was a corporation that operated the original collection and treatment facilities and held
7 the Green Acres CTA transferred to it by the Commission on August 24, 2001 under Cause
8 No. 41991.²⁰ Green Acres served a mostly built out residential customer base surrounding
9 the Golf Course with the Golf Course as the only non-residential customer. HCU, an
10 affiliate of American Suburban Utilities, Inc., is a corporation formed to specifically
11 acquire, build, own and operate plant and equipment for sewage disposal service at the
12 Green Acres Country Club ("the Golf Course") and Green Acres Subdivision. HCU only
13 provides sewage disposal services.²¹ All homes are on private wells.

14 **Q: Please describe HCU and its wastewater facilities.**

15 A: HCU is regulated by the IURC as an investor owned Class C Wastewater Utility providing
16 sewage services to approximately 211 private family homes and one commercial customer,

¹⁸ Cause No. 43294 Compliance Filing - HCU acquisition of the Green Acres Sanitation Company, May 1, 2008.

¹⁹ In Cause No. 43294, Joint Petitioners, Green Acres Sanitation Company, Inc. and Howard County Utilities, Inc. filed their Petition on May 15, 2007. The IURC issued its Final Order on January 23, 2008. HCU acquired the Green Acres wastewater system for \$40,000 in cash and \$26,670 in assumed liability for a bank loan (\$66,670 total cost). Cause No. 43294 Final Order, page 5.

²⁰ Green Acres Sanitation Company, Inc., predecessor to Howard County Utilities, Inc., was incorporated in 2000 and voluntarily dissolved in 2009.

²¹ First Time Development / dba Green Acres Golf Club previously operated Public Water System ("PWS") No. IN2340036 for the Golf Course Clubhouse but notified IDEM in 2015 that it had shut down the water system because it closed the golf course and put it up for sale. See Attachment JTP-7 for HCU's notification letter and IDEM's February 13, 2015 water system inactivation letter.

1 the Green Acres Golf Club, in the rural area along the north side of Wildcat Creek in
2 Howard County, west of Kokomo, Indiana. HCU is owned by Scott Lods as sole
3 shareholder.²² The Green Acres Golf Club is also owned by Scott Lods who purchased it
4 out of bankruptcy at a Marshal's sale in February 2006²³ and then sold it to Divott, LLC
5 on May 10, 2007 for \$370,000.²⁴

6 The gravity collection system is 100% separate sanitary sewers by design with no
7 overflow or bypass points or collection system lift stations.²⁵ In 2011, HCU reported its
8 affiliate, First Time Development Corporation ("FTDC"), completed the new wastewater
9 treatment plant ("WWTP") and a 1,996 LF 15-inch diameter PVC influent sewer from the
10 original wastewater plant's location to the new site on the south side of Wildcat Creek.²⁶

11 HCU operates a Class II, 200,000 gallons per day ("gpd") extended aeration
12 wastewater treatment facility consisting of an influent pump station, comminutor,²⁷ flow
13 equalization (surge tank and pumps), two aeration basins, two final clarifiers, ultraviolet
14 light ("UV") disinfection, post aeration, flow measurement, effluent sewer, a sludge
15 digestion / holding tank, plant equipment, a blower building,²⁸ a control building, site

²² 2019 IURC Annual Report for American Suburban Utilities, Inc. ("ASU"), page E-8. Mr. Lods is also the sole shareholder of HCU affiliates, ASU and First Time Development Corporation ("FTDC").

²³ Cause No. 43294, Direct Testimony of Scott L. Lods, page 5.

²⁴ See Attachment JTP-6 for the property map and the Property Record Card for the Green Acres Golf Club. Divott LLC is also owned by Mr. Lods.

²⁵ According to the appraisal, there are 13,471 lineal feet ("LF") of sewers and 84 manholes. The majority of sewers range in size from 8-inch to 12-inch consisting of older vitrified clay pipe (VCP) sewers (1960s) and newer PVC sewers (1985). See page 40 of Attachment JC-1 to the Direct Testimony of Judith Cleland.

²⁶ HCU's appraiser reports the new influent sewer also includes 77 LF of 24-inch diameter PVC sewer but the design drawings and IDEM Construction Permit No. 19366R only list a 15-inch sewer.

²⁷ Construction Permit No. 19366R issued May 26, 2009 and HCU's In-Service Certification dated May 24, 2011 both indicate there are two comminutors. However, only one comminutor is actually installed.

²⁸ HCU's pre-approved construction did not include a separate blower building. Only a control building was listed under Cause No. 43294 in 2007.

1 electrical and various related appurtenances and facilities.²⁹ Solids are digested and stored
2 in a sludge holding tank.³⁰

3 **Q: What are the hydraulic treatment capacities of HCU's WWTP?**

4 A: HCU sized the replacement plant to treat 200,000 gpd design average flow and 400,000
5 gpd maximum day flow.^{31, 32} This is nearly triple the average flow capacity of the original
6 plant.³³ The HCU plant's higher flow capacities include large allowances for infiltration
7 and inflow ("I&I") into the collection system which HCU has not addressed through sewer
8 repairs and replacements.³⁴ Higher flows caused by clear water leaking into the sewers
9 requires higher capacity pumps and larger clarifiers but does not require larger aeration
10 tanks or sludge handling tanks. HCU also included a large flow equalization tank to help
11 mitigate the impacts of peak flows on the biological treatment systems. The I&I problem
12 may be worsening and will have to be addressed by the new utility owners, most likely
13 through replacement of the vitrified clay pipe ("VCP") sewers and manhole repairs.³⁵

14 The appraiser noted the VCP sewers were installed about 52 years ago and the life
15 expectancy of vitrified clay sewers is commonly considered to be 50 years. I agree with

²⁹ IDEM regulates effluent discharges under NPDES Permit No. IN0063754. The renewal application is due October 2, 2020, 180 days prior to the March 31, 2021 expiration of the current 5-year NPDES permit.

³⁰ It appears Howard County Utilities does not have a current Biosolids permit and does not submit monthly Biosolids disposal reports to IDEM. I could not find any reports in IDEM's Virtual File Cabinet. IDEM inspection reports indicate no sludge is being disposed. See Attachment JTP-5.

³¹ See Cause No. 43294, Direct Testimony of Edward J. Serowka, September 19, 2007, pages 5, 15 and 16. HCU's design engineer, Mr. Serowka, testified the replacement treatment plant was sized for a peak wet weather flow ("PWWF") of 500,000 gpd.

³² HCU later lowered the maximum day flow to 400,000 gpd in its Construction Permit application. IDEM issued Construction Permit No. 19366 on March 9, 2009 and No. 19366R (at HCU's request) on March 26, 2009.

³³ Original Construction Permit issued by the Stream Pollution Control Board, January 12, 1966. The original plant was designed to treat 70,000 gpd from 700 people (at 100 gallons per person per day) on 267 lots.

³⁴ See Cause No. 43294, Serowka Direct Testimony, September 15, 2007, pages 11 to 13. HCU witness Serowka testified that it was better to construct a larger replacement treatment plant in a new location to treat all of the I&I because I&I removal was cost prohibitive.

³⁵ In inspections, IDEM rated Maintenance as unsatisfactory due to HCU experiencing excessive I&I in the collection system which can hydraulically overload the wastewater treatment plant's rated capacity. See Attachment JTP-5.

1 the appraiser that repairs (i.e. replacements) in the future should be anticipated for the VCP
2 sewers.³⁶ Green Acres should budget for emergency sewer repairs, regular sewer cleaning
3 and televising, and sewer and manhole repairs and replacements.

4 **Q: What are the organic treatment capacities of HCU's WWTP?**

5 A: The design of the WWTP is based on a design year population of 2,356 people and
6 pollutant concentrations that were assumed rather than actual historical data.³⁷ HCU's
7 estimated connected population is overstated by a factor of four. Ms. Cleland estimated
8 only 500 people are actually connected to the system, which I agree with based on my
9 review of the pollutant loads reported to IDEM.³⁸ The old plant had been designed for 147
10 pounds per day ("lbs./d") of BOD₅.³⁹ HCU designed the new plant to treat 400 lbs./d of
11 cBOD₅ though this load has not been seen in the past. I believe it is unlikely to be seen in
12 the future. This overabundance of capacity is also evident in the new plant's blower
13 capacity and number of blowers. Responding to 2011 and 2018 IDEM inspection violation
14 notices, HCU defended not having operational blowers by noting it can meet the aeration
15 (and sludge digestion) needs by running only one or two of five blowers.⁴⁰

16 **Q: What are current customer counts and flows and loadings received at the WWTP?**

17 A: Table 1 summarizes the historic customer counts as reported to the IURC and the annual
18 average flows and pollutant loadings for the original and replacement wastewater plants
19 as reported by HCU to IDEM on the Monthly Reports of Operation ("MROs"). HCU's

³⁶ See Attachment JC-1, Preliminary Engineering Report in the Direct Testimony of Judith Cleland, page 9.

³⁷ cBOD₅ stands for the 5-day carbonaceous Biochemical Oxygen Demand. TSS stands for Total Suspended Solids. At 400 pounds per day for both cBOD₅ and TSS and 35 pounds per day of ammonia, HCU designed for organic loadings 2.7 times higher than the original loading even though the assumed homes served decreased. See Attachment JTP-8 for the 2009 Design Summary for the replacement treatment plant.

³⁸ See Attachment JC-1, Preliminary Engineering Report in the Direct Testimony of Judith Cleland, page 9.

³⁹ Original Construction Permit issued by the Stream Pollution Control Board, January 12, 1966.

⁴⁰ The original design included six blowers. See Attachment JTP-5 for the IDEM inspection reports and HCU's December 9, 2011 and September 10, 2018 responses indicating that only one or two of the five blowers are needed.

1 customer base has not increased over the last 20 years and is not expected to increase.⁴¹

Table 1 – Customer Counts and Comparison of Annual Average and Maximum Flows and Pollutant Loads to Design Capacities

Year	Residential Customers	Flow (mgd)		cBOD ₅		TSS		Ammonia	
		Avg.	Max.	mg/L	lbs./d	mg/L	lbs./d	mg/L	lbs./d
Original Green Acres Wastewater Treatment Plant (1966 Facility)									
2007	211	0.060	0.143	185	70.5	113	71.4	36.2	7.8
2008	207	0.065	0.208	103	45.3	79	34.1	12.1	5.2
2009	210	0.066	0.199	100	44.5	79	35.0	11.9	5.3
2010	210	0.066	0.213	89	41.6	76	34.8	11.0	5.4
2011	204	0.083	0.147	65	41.7	75	50.5	7.9	5.4
2007-11	208	0.066	0.213	99	46.4	78	36.9	13.3	5.5
Design	267	0.070		250	147				
% Cap.		94%		40%	32%				
Howard County Utilities Wastewater Treatment Plant (2011 Facility)									
2011	204	0.097	0.691	77	83.7	89	97.9	12.8	9.0
2012	212	0.083	0.561	82	51.4	104	70.0	16.9	9.9
2013	211	0.103	0.591	82	56.6	102	80.6	13.8	10.0
2014	210	0.087	0.561	102	63.7	92	58.1	14.1	9.6
2015	213	0.139	0.493	116	127.9	73	74.6	10.9	11.5
2016	214	0.120	0.464	130	129.0	71	70.9	13.9	12.0
2017	213	0.181	0.561	115	160.0	75	105.6	12.0	14.0
2018	211	0.153	0.547	115	145.3	76	87.4	11.2	12.7
2019	211	0.156	0.486	108	131.2	73	83.0	11.6	10.9
2015-19	212	0.150	0.561	117	138.7	74	84.3	11.9	12.2
Design		0.200	0.400	240	400.3	240	400.3	35	58.4
% Cap.		75%	140%	49%	35%	31%	21%	34%	21%

⁴¹ See Attachment JC-1 (Preliminary Engineering Report) to the Direct Testimony of Judith Cleland. On page 9 she stated that “Only very minimal increase in customers is anticipated.” She also reported on page 4 that “The future maximum number of customers is estimated to be 225” but did not provide the basis for this increase.

1 **Q: When did HCU begin construction of its wastewater improvements?**

2 A: In response to discovery, HCU reported construction began on April 13, 2009.⁴² However,
3 HCU's lack of progress was noted during several IDEM inspections in 2009. *See*
4 Attachment JTP-5 for IDEM's Inspection Reports.

5 **Q: When did HCU place its new wastewater treatment facilities in service?**

6 A: HCU reported to the IURC the in service date was May 24, 2011.⁴³ This occurred 14
7 months after the completion deadline in HCU's IDEM approved Compliance Plan to
8 eliminate unauthorized bypasses, sanitary sewer overflows ("SSOs"), and effluent
9 violations.⁴⁴ Separately, in a 2012 response to an IDEM Inspection Summary letter, HCU
10 assured IDEM's Compliance Branch "that the Howard County Wastewater Treatment
11 Plant will be completed and certified as complete no later than March 26, 2014."⁴⁵

12 **Q: How were the new facilities proposed, permitted, funded, and constructed?**

13 A: In 2007, HCU sought Commission pre-approval of \$851,799 for design and construction
14 to add a new influent sewer and replace the original steel package treatment plant with a
15 new higher capacity concrete treatment plant and influent pump station (located outside
16 Wildcat Creek's floodway). Under the Cause No. 43294 acquisition and preapproval case,
17 HCU did not indicate the funding source it would use for construction and did not request
18 authority to issue debt. HCU's \$851,799 pre-approval cost estimate included the following
19 components but did not include land acquisition costs or allowance for funds used during

⁴² *See* Attachment JTP-4 for HCU's response to OUCC Data Request 4-5, Cause No. 45283-U regarding project milestone dates.

⁴³ *See* the Cause No. 43294 True-up Report filed on June 1, 2011 for the In-Service Certification.

⁴⁴ Under Item C (Exhibit A - Compliance Plan) of Agreed Order 2007-17191-W, HCU was required to complete the new wastewater facilities on March 26, 2010 within 365 days after receiving Construction Permit No. 19366R issued by IDEM on March 26, 2009. HCU requested and was granted extensions to finish construction.

⁴⁵ *See* Attachment JTP-5 for the February 7, 2012 response from Edward J. Serowka of Lakeland Innovatech to Donald R. Daily, Inspection Section Chief, Compliance Branch, page 73 of 124.

1 construction (“AFUDC”).⁴⁶

Pre-approved Project Costs, January 23, 2008

Estimated construction cost	\$763,945
Construction contingency (10%)	\$69,450
Engineering design (7.5%)	\$57,296
Engineering project supervision (4%)	<u>\$30,558</u>
HCU Total Estimated Project Cost	\$851,799

2 Engineering costs totaled 11.5%. Mobilization, demobilization and bond costs were not
3 separately identified and are assumed to be part of the construction cost. The Commission
4 preapproved expenditures up to HCU’s requested amount and required HCU to file a
5 certificate of in-service date together with a true-up report but noted “[i]f the actual cost
6 exceeds the approved estimates, then whether such excess amounts are reasonable and
7 prudently incurred so as to be included in rate base for ratemaking purposes will be
8 addressed in a subsequent rate case.”⁴⁷

9 **Q: Did HCU stay within its \$851,799 pre-approved authorization?**

10 A: No. HCU’s reported project costs increased to \$1,654,336, nearly double the pre-approved
11 amount.⁴⁸ After HCU reported its the project was completed and in service, HCU reported
12 the following revised higher total project costs.⁴⁹

⁴⁶ Cause No. 43294, Direct Testimony of Edward J. Serowka, Exhibit EJS-4 – Engineer’s Estimate, Revision 1, September 14, 2007.

⁴⁷ Cause No. 43294 Final Order, page 8, January 23, 2008.

⁴⁸ See Cause No. 43294 True-up Report submitted on June 1, 2011 including Attachment 4, the Engineer’s Project Estimated Cost (September 15, 2008) prepared by Edward J. Serowka.

⁴⁹ *Id.*

**HCU's Reported Engineer's Project Estimated Costs (September 15, 2008)
Attachment 4, True-Up Report, June 1, 2011, Cause No. 43294**

Construction Cost	\$1,428,615
Construction Contingency (10%)	\$142,862
Engineering design	\$20,000
Engineering project supervision (4%)	<u>\$62,859</u>
HCU Total Project Cost	\$1,654,336

1 HCU reduced engineering costs to 5.3%. Mobilization, demobilization and bond costs
2 were not separately identified and are assumed to be part of the construction cost. HCU
3 also listed as rate base costs, the land purchase and sewer cleaning and televising costs
4 summarized below:⁵⁰

HCU Reported Total Improvements Costs - True-Up Report, June 1, 2011

Total Project Costs	\$1,654,366
Land Purchase for New Plant Location	\$138,975
Televising and Cleaning of Existing Lines	\$41,662
Total Improvements Cost	\$1,835,003

5 **Q: What was HCU's support for its reported \$1,654,366 Total Project Costs?**

6 A: HCU submitted a revised Engineer's Project Estimated Cost, dated September 15, 2008,
7 prepared by its consultant as Attachment 4 to its 2011 True-up Report.

8 **Q: What total project cost did HCU list on its Construction Permit application?**

9 A: HCU listed a \$1,000,000 total project cost in its September 18, 2008 IDEM application.

⁵⁰ Land costs of \$138,975 to buy the 18.53 acre parcel (Parcel No. 4-08-04-400-026.000-023) for the new wastewater plant were not included in the \$851,799 pre-approved amount. The land was purchased on May 8, 2008. See Attachment JTP-6 for the property maps and Property Record Cards for two parcels for the HCU-2 wastewater treatment plant and access road. The \$41,662 in claimed sewer cleaning and televising costs, which should have been expensed and not capitalized, were also not identified.

1 **Q: In its June 1, 2011 True-up Report, did HCU ask for Commission approval of excess**
2 **expenditures above the \$851,799 pre-approved amount?**

3 **Q:** No. HCU identified the increased costs but did not request their inclusion in rate base.
4 HCU requested that the \$69 per month unmetered flat rate cap (based on the \$851,799
5 preapproved amount) be placed in its tariff (Attachment 5) as originally proposed.

6 **Q: Did the Commission ask about HCU's reported increased costs?**

7 **Q:** Yes. In its June 15, 2011 Docket Entry, the Commission required HCU explain or provide
8 the following:

- 9 1. Reasons for the cost estimate increases
- 10 2. Identification of all sources or references that were relied on by the engineer to develop
11 the September 2007 and 2008 cost estimates
- 12 3. Copies of all invoices greater than \$10,000
- 13 4. The total amount of the plant costs paid to affiliated companies of Mr. Lods or
14 Petitioner and provide a breakout of general cost categories with an explanation of the
15 services or products provided
- 16 5. Explain how the land value was determined
- 17 6. Submit a calculation of the AFUDC and a detailed explanation as to the reason for the
18 length of time it took to construct the wastewater treatment plant

19 **Q: How did HCU respond to the Docket Entry?**

20 **A:** HCU responded to each question but indicated it was not seeking approval of costs above
21 the \$851,799 preapproved amount, stating:

- 22 (a) HCU has not sought or obtained and is not seeking approval of the actual
23 construction costs. The only amount that has been approved is the
24 original \$851,799 estimate. As the Commission explained, "If the
25 actual cost exceeds the approved estimates, then whether such excess
26 amounts are reasonable and prudently incurred so as to be included in
27 rate base for ratemaking purposes will be addressed in a subsequent rate
28 case." Order, p. 8.⁵¹

⁵¹ Cause No. 43294, HCU June 27, 2011 response to the IURC's June 15, 2011 Docket Entry, pages 3 and 4.

1 **Q: In its Docket Entry response, did HCU provide invoices to support its reported costs?**

2 A: HCU submitted 18 one page invoices totaling \$730,500 for the June 2008 to June 2011
 3 period from affiliate, First Time Development Corporation. HCU certified the HCU-2
 4 plant in service on May 24, 2011. These invoices did not include dates FTDC performed
 5 work or state what work was performed, construction progress, inspector reports,
 6 equipment and material supplier invoices, subcontractor invoices, or other documentation
 7 that is standard for construction projects. FTDC also billed \$54,125 for Engineering
 8 Project Supervision services (one invoice) and another \$41,662 for sewer cleaning and
 9 televising services (ten invoices) between November 2008 and February 2011. For the
 10 June 2008 to June 2011 period, HCU's total payments to FTDC totaling \$826,287.15 are
 11 summarized in Table 2.

Table 2
HCU payments to Affiliate First Time Development Corp. per
HCU's June 27, 2011 response to The Commission's Docket Entry⁵²

Year	Televise and clean lines	HCU-2 Construction Payments	Engineering Project Supervision	Total Paid to FTDC
2008	\$6,564.20	\$0	\$0	\$6,564.20
2009	\$29,099.63	\$69,000.00	\$0	\$98,099.63
2010	\$2,161.60	\$591,500.00	\$0	\$593,661.60
2011	\$3,836.72	\$70,000.00	\$54,125.00	\$127,961.72
Total	\$41,662.15	\$730,500.00	\$54,125.00	\$826,287.15

12 HCU reported completed construction work totaled \$1,571,477, but the amount paid was
 13 only \$730,500, and the amount owed was \$840,977.⁵³

⁵² *Id.*, page 1 of Attachment D (page 58 of 119 overall).

⁵³ *Id.*, page 14 of Attachment D (page 71 of 119 overall).

1 **Q: What further actions were taken by the Commission or HCU for Cause No. 43294?**

2 A: None. Since HCU had not filed a rate case, only the \$851,799 preapproved amount was
3 allowed in rate base and the \$69 unmetered flat rate became effective on June 1, 2011.⁵⁴ It
4 appears no formal review of HCU's claimed costs above the preapproved amount occurred.

5 **Q: Did HCU subsequently file a rate case to recover its reported capital costs?**

6 A: Yes. Eight years later on August 23, 2019, HCU filed a Small Utility Rate application
7 under Cause No. 45283-U seeking to increase rates 123.07% from the existing \$69 per
8 month to \$153.92 per month, explaining the need for increased rates as follows:

9 Rates were established for Howard County Utilities in connection with the
10 acquisition of a troubled utility (Green Acres Sanitation Company, Inc.
11 ("GASC")) in Cause No. 43924 pursuant to the Commission's Order dated
12 January 23, 2008 - more than 11 years ago. At that time, GASC was a defendant
13 in litigation filed by IDEM, and IDEM had taken over operations as the result
14 of a serious spill. The rates approved in Cause No. 43294 were not designed to
15 recover a full return on the new wastewater treatment plant that HCU
16 constructed, which was built at a new location across the stream and outside of
17 the surrounding neighborhood and golf course. For many years, HCU has been
18 in negotiations with the homeowners to sell the utility to a new entity that would
19 be controlled by area residents. Those negotiations are ongoing, and it is HCU's
20 preference that the utility be sold. The service area is simply too remote from
21 American Suburban Utilities, Inc. to capture economies of scale, and the returns
22 earned are inadequate. New rates are needed whether the utility is sold or not.
23 If it is sold, the new owners will benefit from having the rates approved so that
24 it will facilitate obtaining financing. Alternatively, if the utility is not sold, new
25 rates are needed because HCU cannot continue indefinitely to operate the utility
26 at substandard returns. In addition to substandard returns, the new rates will
27 need to reflect a proper allocation of costs of services provided by American
28 Suburban Utilities. As the Commission may recall, pursuant [sic] to the original
29 affiliate agreement with HCU, ASU provides many services to HCU at
30 essentially no cost. That affiliate agreement is now expired. Petitioner is
31 submitting the calculation of the proposed allocation of expenses. If these
32 services were not to be obtained from ASU, they would be needed from
33 somewhere else.

⁵⁴ Cause No. 43294, HCU True-up Report, June 1, 2011, Attachment 5 (Tariff)

1 **Q: Did HCU / FTDC construct the 2011 wastewater improvements in accordance with**
2 **the design drawings?**

3 A: Not completely. It appears numerous changes were made to the design that are not shown
4 on the drawings. These changes include:

5 1. The influent sewer's route was changed and lengthened.

6 2. HCU added two additional manholes (total of seven).

7 3. The influent pump station was to be located adjacent to the Equalization tank. Instead
8 it was located further down the hill away from the treatment tanks.

9 4. There is only one instead of two comminutors in the influent pump station valve vault.

10 5. The access stairs and the steel walkways are in different locations.

11 6. There is no bar screen in the Equalization tank.

12 7. There are five instead of six blowers in the Blower Building.

13 8. The blowers do not have acoustic noise enclosures.

14 9. The Blower Building is much larger and taller than the design. It appears the building
15 was enlarged to maintain and store lawn equipment for the golf course.

16 10. The Control Building layout differs from the design and does not contain a laboratory.

17 **Q: What happened to HCU's requested rate increase under Cause No. 45283-U?**

18 A: On November 7, 2019, HCU filed a Motion to Stay the procedural schedule pending the
19 proposed sale of HCU's assets that is the subject of the current proceeding. HCU stated it
20 had executed an Asset Purchase Agreement with the Green Acres Subdivision
21 Homeowners Association whereby, subject to Commission approval, HCU would transfer
22 its franchise, works and system, including certificate of territorial authority, to the
23 homeowners. On the previous evening, November 6, 2019, I attended the Commission's
24 Public Field Hearing at the Green Acres Golf Course Clubhouse for the Cause No. 45283-

1 U rate increase. Four HCU customers spoke about the rate increase but no one mentioned
2 the Homeowners Association and HCU had signed an Asset Purchase Agreement. One
3 person mentioned that they (assumed to be the Homeowners Association) had been trying
4 to buy the utility for some time. HCU's Motion to Stay and the proposed sale effectively
5 ended Cause No. 45283-U and further OUCC review whether HCU's claimed construction
6 costs were reasonable and prudent.

OUCS DR 1-8

April 27, 2020

DATA INFORMATION REQUEST
Howard County Utilities, Inc., and
Green Acres Subdivision Sewer System, Inc.

Cause No. 45360

Information Requested:

Please provide all source documents, records, reports and information Cleland Environmental Engineering, Inc., relied on to identify the location, size and quantity of HCU's wastewater system assets. If any documents were provided by an entity other than HCU or Green Acres Sewer, please so state and identify the source for any such document.

Objection:

Joint Petitioners object to the request on the grounds and to the extent the request seeks information that is confidential, proprietary, competitively-sensitive and/or trade secret. Subject to and without waiver of the foregoing objection, Joint Petitioners respond as follows.

Party Responding: HCU and Cleland Environmental Engineering, Inc.

Information Provided:

- Maps – see the list and attachments included with the Response to OUCS DR 1-6
- IURC documents (2) – obtained from the IURC website (these documents contain description on the plant constructed in 2011, drawings for the new facilities, HCU cost estimate, independent cost estimate), included as Attachment OUCS DR 1-8_Attachment 1.
- Photos from site visits – 3/7/16 and 5/31/19, included as Attachment OUCS DR 1-8_Attachment 2.
- Quote for sewer work done with new plant construction, included as Attachment OUCS DR 1-8_Attachment 3_CONFIDENTIAL.
- Three emails from ASU Accounting, included as Attachment OUCS DR 1-8_Attachment 4.

Attachments:

OUCS DR 1-8 Attachment 1.pdf **43294 True-up filed 06/01/2011 (included as Attachment JTP-D)**
OUCS DR 1-8 Attachment 2.pdf **03/07/2016 and 05/31/2019 site visit photos**
OUCS DR 1-8 Attachment 3 CONFIDENTIAL.pdf **undated Atlas Excavating Proposal**
OUCS DR 1-8 Attachment 4.pdf **2018 emails between ASU Accounting and Judy Cleland**



03.07.2016 00:00



03.07.2016 00:01

GD **GARDNER DENVER®**
Submittal

304GA4488

GD **GARDNER DENVER®**

304GA4488	228
MODEL	SERIAL NO.
304	2250
CATALOG NO.	MAX. RPM

GARDNER DENVER, INC.
1800 Gardner Expressway
Quincy, IL 62305

800-882-9999
www.GardnerDenverProducts.com
301GEJ495



03.07.2016 00:04

GD GARDNER DENVER

MODEL

03 3720

SERIAL NO.

CATALOG NO.

2357

M.S.R. RPM

GARDNER DENVER, INC.

10000 W. ALPINE AVE.

DENVER, CO 80231

WWW.GARDNERDENVER.COM

HAUST HOS

03.07.2016 00:04





03.07.2016 00.05



03.07.2016 00:09





03.07.2016 00:09





03:07:2016 00:10



03.07.2016 00:11



03.07.2016 00:11



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03:07.2016 00:11



03/07/2016 00:12



03:07:2016 00:12



03.07.2016 00:13



03/07/2016 00:13



03.07.2016 00:13



03.07.2016 00:27











































Subject: Re: Green Acres

Date: Wednesday, March 21, 2018 at 1:38:23 PM Eastern Daylight Time

From: ASU Accounting

To: Judy Cleland

We are not sure on the PVC. It was not done by us and it's close to the clubhouse, so that may help you.

On Wed, Mar 21, 2018 at 2:42 PM, Judy Cleland <judy@clelandengineering.com> wrote:

I assumed the clay pipe was installed in 1965. On the PVC, I am assuming it was sometime after then. If you can find out that would be great, otherwise I will check age of homes in that part of the subdivision and make an estimate on the installation date.

Thanks.

Judy

From: ASU Accounting <accounting@asucorp.com>

Date: Wednesday, March 21, 2018 at 12:36 PM

To: Judy Cleland <judy@clelandengineering.com>

Subject: Re: Green Acres

Do you need me to find out on the year? Scott was thinking it was in the 60's.

On Wed, Mar 21, 2018 at 2:30 PM, Judy Cleland <judy@clelandengineering.com> wrote:

Thanks Amy.

Judy

From: ASU Accounting <accounting@asucorp.com>

Date: Wednesday, March 21, 2018 at 12:19 PM

To: Judy Cleland <judy@clelandengineering.com>

Subject: Re: Green Acres

Judy,

The subdivision pipe breaks out to this:

250 feet of 6" PVC pipe

2,420 feet of 12" clay pipe

8,805 feet of 8" clay pipe

Still looking for the year it was built.

Thanks,

On Tue, Mar 20, 2018 at 10:34 AM, Judy Cleland <judy@clelandengineering.com> wrote:

Thanks Amy for your help.

Judy

From: ASU Accounting <accounting@asucorp.com>

Date: Tuesday, March 20, 2018 at 8:22 AM

To: Judy Cleland <judy@clelandengineering.com>

Subject: Re: Green Acres

Judy,

We paid for 1,750 ft of 15" pipe for the Green Acres project and 7 manholes.

The total for the pipe and manholes was \$39,345. This total along with the quote from Atlas I sent yesterday totals \$471,902.

I am working today on getting you the total feet of pipe of the clay and PVC from the existing lines.

If there is anything else I can get for you, please don't hesitate to ask. You can reach me at [765-463-3856](tel:765-463-3856).

thank you,

Amy

On Mon, Mar 19, 2018 at 4:22 PM, Judy Cleland <judy@clelandengineering.com> wrote:

Thanks for the original cost estimate for the sewer installation.

Judy Cleland, P.E.

CLELAND ENVIRONMENTAL ENGINEERING, INC.

[8308 Thorn Bend Drive](http://8308ThornBendDrive.com)

[Indianapolis, IN 46278-5049](http://Indianapolis,IN46278-5049.com)

[317-733-0351](tel:317-733-0351)

Judy@clelandengineering.com

From: ASU Accounting <accounting@asucorp.com>

Date: Monday, March 19, 2018 at 11:58 AM

To: Judy Cleland <judy@clelandengineering.com>

Subject: Re: Green Acres

Hi Judy. Scott wanted me to get this to you. Attached is the bid proposal for the Green Acres project from 2009. This is the bid for the pipe for Green Acres. The Sanitary pipes were only installed by Atlas - see quote. First Time Development actually purchased the sanitary sewer pipe and the manholes.

I am going through old invoices to find those amounts, but I have had a family emergency come up and will have to get those to you tomorrow.

I hope this helps.

Thank you,

On Wed, Mar 14, 2018 at 3:41 PM, Judy Cleland <judy@clelandengineering.com> wrote:

Scott,

Per our conversation, attached is my preliminary valuation of the wastewater facilities serving Green Acres Subdivision. If you have suggestions on areas where the costs are low such as the sewer lines installed as part of the WWTP project, please let me know. Also any information on any sewers that might have been installed after the original facility construction, that would be helpful.

Thanks.

Judy Cleland, P.E.

CLELAND ENVIRONMENTAL ENGINEERING, INC.

[8308 Thorn Bend Drive](#)

[Indianapolis, IN 46278-5049](#)

[317-733-0351](#)

Judy@clelandengineering.com

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Toni Neal and Amy Harper
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accounting@asucorp.com
[765-463-3856](tel:765-463-3856)

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Judy@clelandengineering.com

--

Toni Neal and Amy Harper

Accounting, American Suburban Utilities

accounting@asucorp.com

765-463-3856

Subject: Re: Green Acres

Date: Tuesday, March 20, 2018 at 8:22:28 AM Eastern Daylight Time

From: ASU Accounting

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Judy@clelandengineering.com

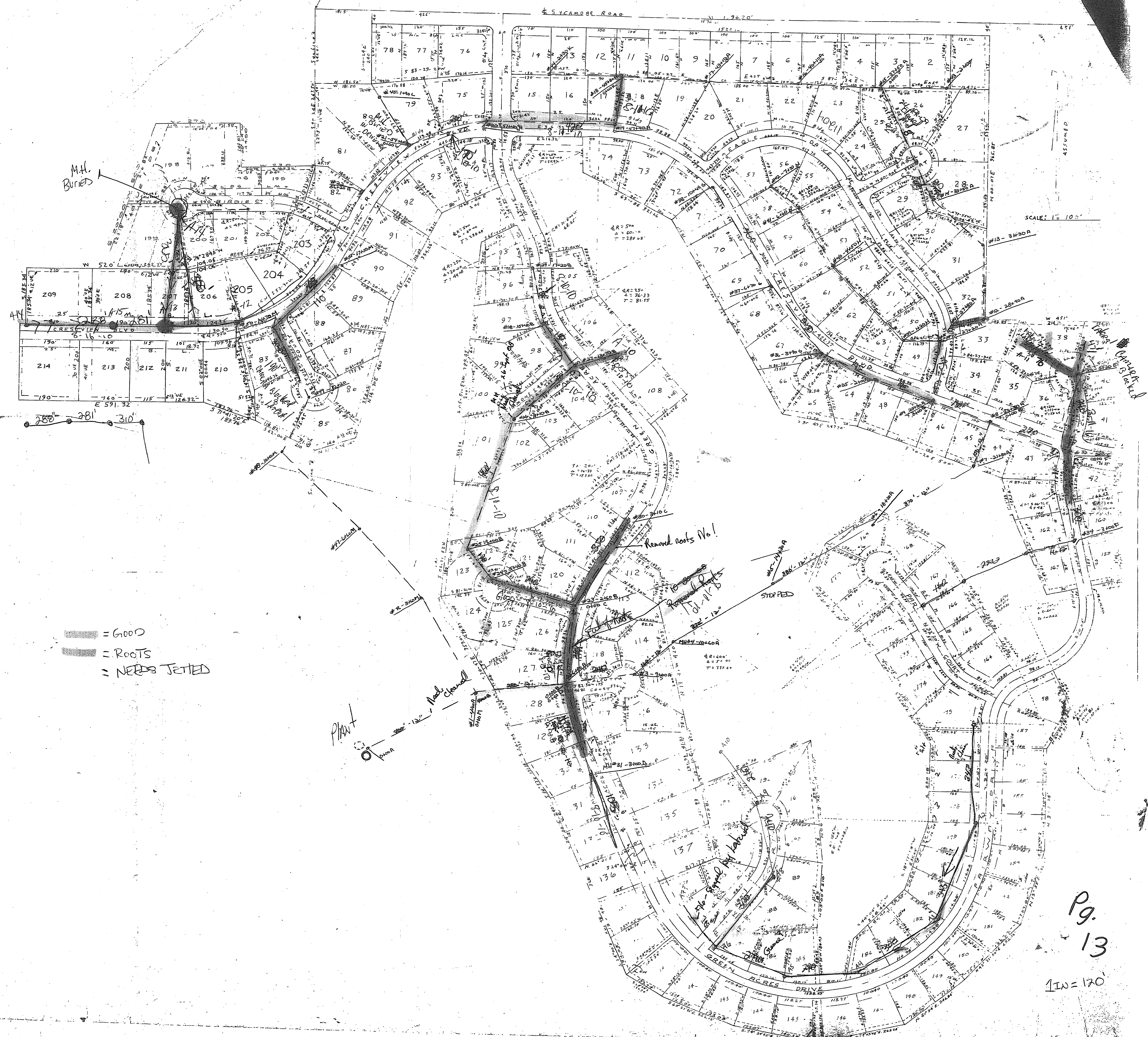
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Toni Neal and Amy Harper
Accounting, American Suburban Utilities
accounting@asucorp.com
[765-463-3856](tel:765-463-3856)

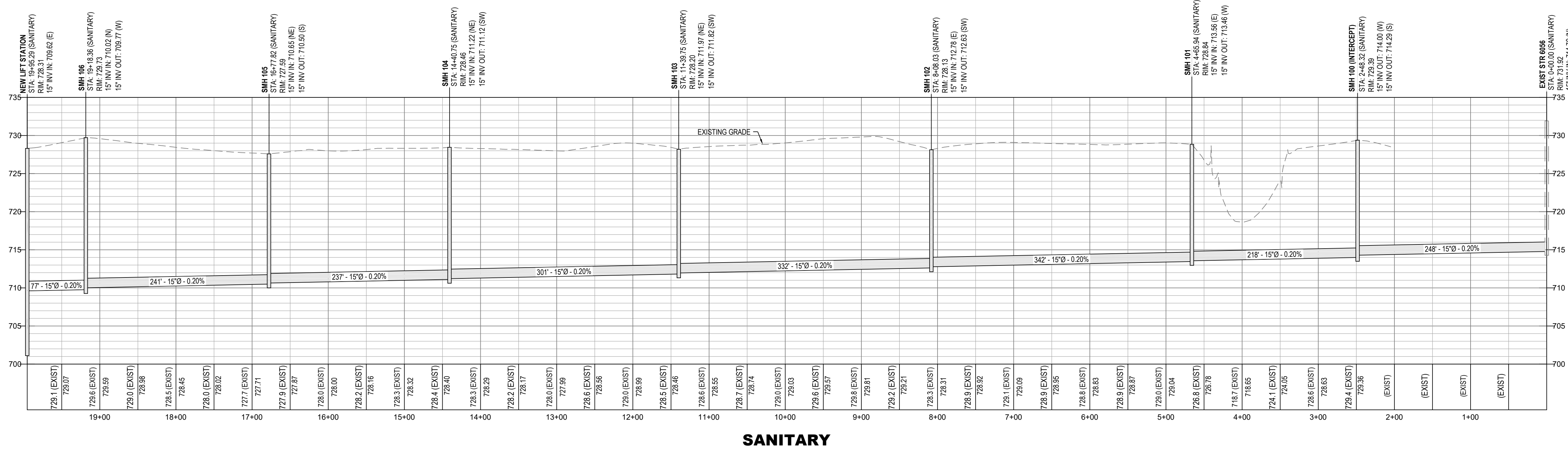
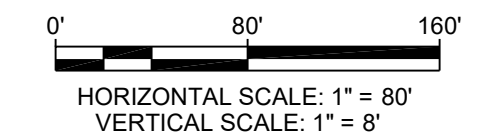
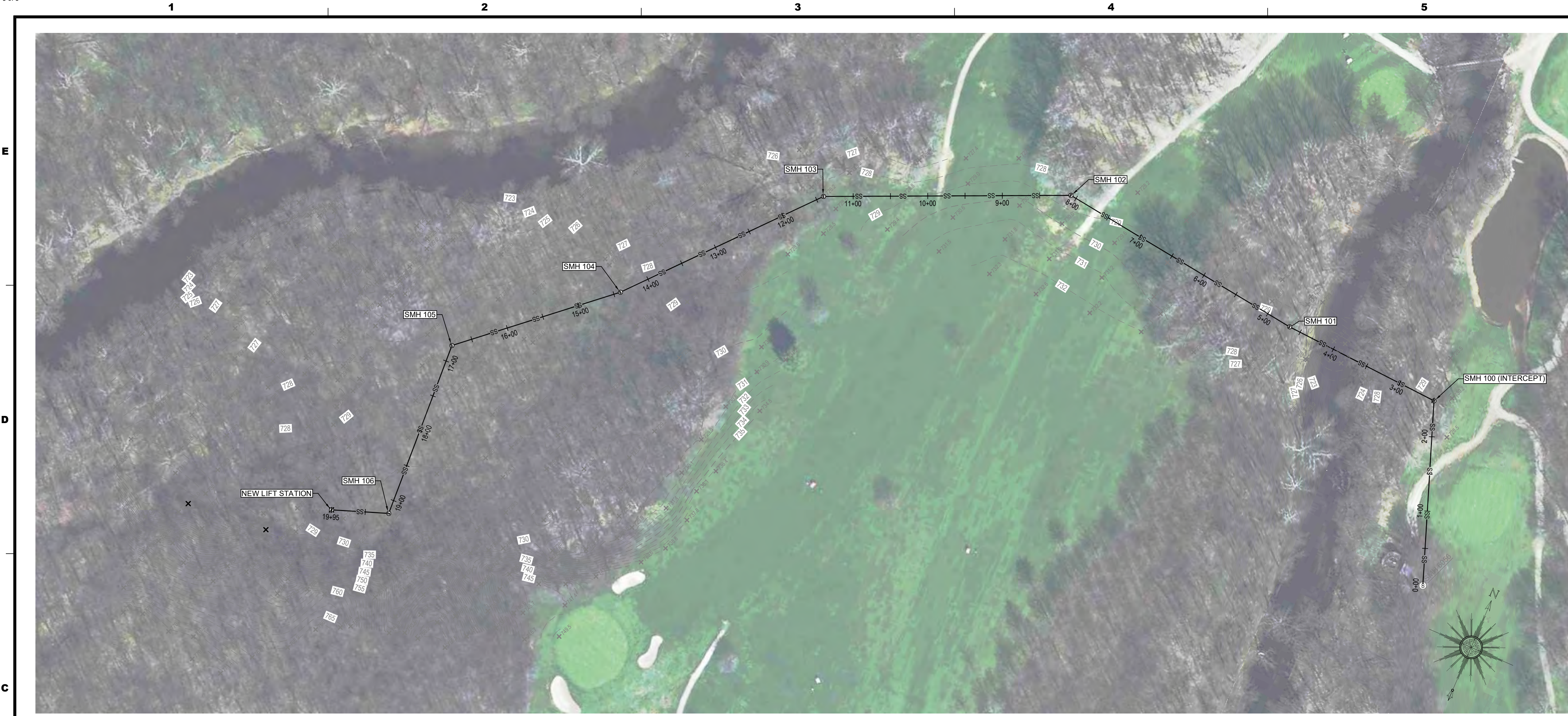
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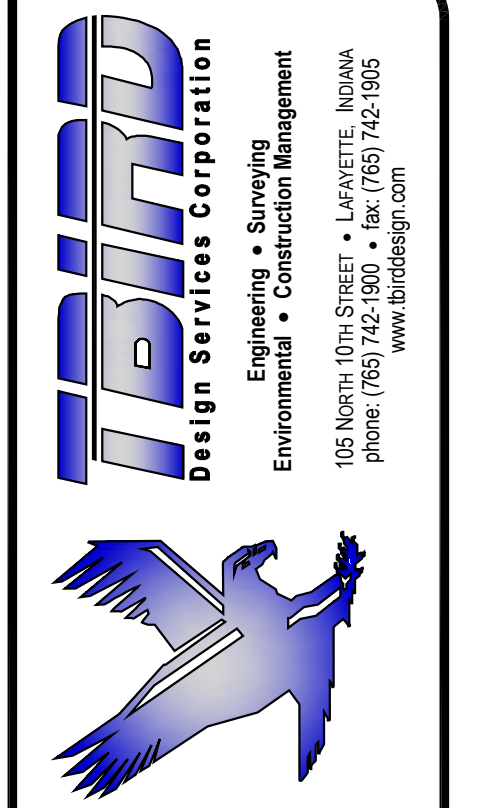




— = GOOD
- - - = ROOTS
... = NEEDS JETTED



SANITARY



CERTIFIED BY:

GREEN ACRES
AMERICAN SUBURBAN UTILITY
3350 WEST COUNTY ROAD 250 NORTH
WEST LAFAYETTE, IN 47906

MARK	DATE	DESCRIPTION

PROJECT NO: **08018**
 FILE: 08018-SANITARY.DWG
 DRAWN BY: NMD
 CHECKED BY: PSJ
 LOCATION:
 A PART OF THE SOUTHEAST QUARTER
 OF SECTION 04, TOWNSHIP 23 NORTH,
 RANGE 02 EAST, HOWARD COUNTY,
 INDIANA

TITLE:
**SANITARY
 SEWER
 SCHEMATIC
 PLAN & PROFILE**

C101

NOTES
 1 EXISTING SEWER NOT SHOWN. CONNECTIONS AND INTERFERENCES WITH EXISTING SEWER
 MUST BE FIELD INVESTIGATED AND INCORPORATED WITH THIS SCHEMATIC

FILE: P:\2008\0818 Green Acres\DRAWINGS\PLANS\0818-SANITARY.dwg · USER: PAT_JARBORCE · DATE: Thursday, October 15, 2009 10:11:47 AM

**OUCC Calculation of Concrete Unit Costs Using
RS Means Manual Concrete Costs
Source: Heavy Construction Costs, 2019 Edition**

1. Slab on grade - 6-inch thick, page 79

Line Number: 03 30 53.40 4650

	Materials	Labor	Equipment	Total	Incl. Overhead & Profit
\$/CY	\$ 141.00	\$ 47.50	\$ 0.29	\$ 188.79	\$ 228.00
CCI % Kokomo	88.90%	81.20%	81.20%		
CCI Adj. \$/CY	\$ 125.35	\$ 38.57	\$ 0.24	\$ 164.15	\$ 198.25
				Use	\$ 200.00

2. Walls, free-standing, 15-inches thick, 18 feet high, page 79

Line Number: 03 30 53.40 4500

	Materials	Labor	Equipment	Total	Incl. Overhead & Profit
\$/CY	\$ 184.00	\$ 210.00	\$ 17.80	\$ 411.80	\$ 535.00
Adj. % for 24' Walls	10%	10%	10%	10%	
Adj. 24' Walls \$/CY	\$ 202.40	\$ 231.00	\$ 19.58	\$ 452.98	\$ 588.50
CCI % Kokomo	88.90%	81.20%	81.20%		
CCI Adj. \$/CY	\$ 179.93	\$ 187.57	\$ 15.90	\$ 383.40	\$ 498.11
				Use	\$ 500.00

3. Concrete fillets without reinforcing (for clarifiers)

	Materials	Labor	Equipment	Total	Incl. Overhead & Profit
\$/CY at 95%	\$ 126.90	\$ 42.75	\$ 0.26	\$ 169.91	\$ 205.20
CCI % Kokomo	88.90%	81.20%	81.20%		
CCI Adj. \$/CY	\$ 112.81	\$ 34.71	\$ 0.21	\$ 147.74	\$ 178.42
				Use	\$ 180.00

Concrete fillet costs are assumed at 95% of slab unit costs

HCU-2 Concrete Volume Calculations and Costs - OUCC Estimate

HCU Concrete Treatment Tanks - Concrete Volumes and Costs

Equalization (Surge) Tank, Sludge Holding Tank, Aeration Tanks Nos. 1 and 2, and Final Clarifiers Nos. 1 and 2

Component	Qty	Dimensions (feet)				OUCC Estimate				Appraiser's Estimate		
		Length (E-W)	Length (N-S)	Thickness	Hgt.	Vol. (CF)	Calc. Vol. (CY)	Est. Cost/CY	OUCC Est. Total Cost	Est. Vol. (CY)	Est. Cost per CY	Est. Total Cost
Main Tanks slab	1	96.25	55.75	2.0		10,732	397.5	\$ 200	\$ 79,495			
Post Air Tank slab	1	12	14	2.0		336	12.4	\$ 200	\$ 2,489			
E-W Outside Walls	2	92.25		1.25	24	5,535	205.0	\$ 500	\$ 102,500			
E-W Aeration Wall	1	26		1.25	24	780	28.9	\$ 500	\$ 14,444			
E-W Clarifier Wall	1	12		1.25	24	360	13.3	\$ 500	\$ 6,667			
N-S Walls (all)	5		49.25	1.25	24	7,388	273.6	\$ 500	\$ 136,806			
Post Air Tank Walls	2	13.25		1.25	24	795	29.4	\$ 500	\$ 14,722			
Post Air Tank Walls	1		10	1.25	24	300	11.1	\$ 500	\$ 5,556			
Clarifier Fillets	4						129.0	\$ 180	\$ 23,220			
Treatment Tanks Total Concrete						1,100	351		\$ 385,899	880	\$ 600	\$ 528,000
Total Concrete w/o Fillets						971.3	373		362,679			

HCU Concrete Influent Pump Station - Concrete Volumes and Costs

Wet Well

Foundation slab	1	14	14	1.0		196	7.3	\$ 200	\$ 1,452
East - West walls	2	14		1.0	33.7	944	34.9	\$ 500	\$ 17,473
North - South walls	2		12	1.0	33.7	809	30.0	\$ 500	\$ 14,977
Top slab	1	14	14	1.0		196	7.3	\$ 200	\$ 1,452

Valve Vault

Foundation slab	1	14.5	11.33	1.0		164	6.1	\$ 200	\$ 1,217
East - West walls	2	14.5		1.0	10.6	308	11.4	\$ 500	\$ 5,695
North - South walls	2		9.33	1.0	10.6	198	7.3	\$ 500	\$ 3,666
Top slab	1	14.5	11.33	1.0		164	6.1	\$ 200	\$ 1,217

Influent Pump Station Total Concrete						110	\$ 427	\$ 47,148	114	\$ 600	\$ 68,400
Total Concrete Cost								\$ 433,047			\$ 596,400
Cost Reduction								\$ 163,353			

Howard County Utilities, Inc. transfer to
Green Acres Subdivision Sewer System, Inc.
Cause No. 45360

Prepared by: Jim Parks
OUCC / July 21, 2020

Heavy Construction Costs with RSMMeans data

Derrick Hale, PE, Senior Editor

GORDIAN®

2019

33rd annual edition

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Noam Reininger

Engineering Director

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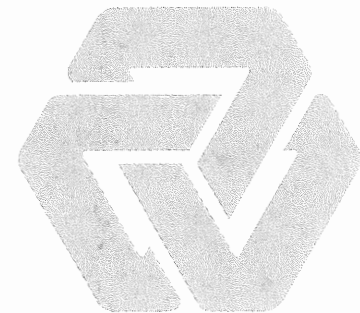
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03 30 Cast-In-Place Concrete

03 30 53 - Miscellaneous Cast-In-Place Concrete

03 30 53.40 Concrete In Place		Crew	Daily Output	Labor-Hours	Unit	Material	2019 Bare Costs		Total	Total Incl O&P
							Labor	Equipment		
3110	including forms or reinforcing									
3150	Regular concrete (4000 psi), 4" slab	C-8	2613	.021	S.F.	1.71	.98	.32	3.01	3.71
3200	6" slab		2585	.022		2.50	.99	.33	3.82	4.59
3250	2-1/2" thick floor fill		2685	.021		1.11	.95	.31	2.37	3.01
3300	Lightweight, 110 #/C.F., 2-1/2" thick floor fill		2585	.022		1.21	.99	.33	2.53	3.17
3400	Cellular concrete, 1-5/8" fill, under 5000 S.F.		2000	.028		.83	1.28	.42	2.53	3.28
3450	Over 10,000 S.F.		2200	.025		.80	1.16	.38	2.34	3.04
3500	Add per floor for 3 to 6 stories high		31800	.002			.08	.03	.11	.15
3520	For 7 to 20 stories high		21200	.003			.12	.04	.16	.22
3540	Equipment pad (3000 psi), 3' x 3' x 6" thick	C-14H	45	1.067	Eq.	46.50	53.50	.59	100.59	133
3550	4' x 4' x 6" thick		30	1.600		72.50	80.50	.88	153.88	201
3560	5' x 5' x 8" thick		18	2.667		132	134	1.47	267.47	350
3570	6' x 6' x 8" thick		14	3.429		181	172	1.89	354.89	460
3580	8' x 8' x 10" thick		8	6		385	300	3.30	688.30	880
3590	10' x 10' x 12" thick		5	9.600		665	485	5.30	1,155.30	1,475
3600	Flexural concrete on grade, direct chute, 500 psi, no forms, reinf, finish	C-8A	150	.320	C.Y.	124	14.10		138.10	157
3610	650 psi		150	.320		139	14.10		153.10	174
3620	750 psi		150	.320		209	14.10		223.10	250
3650	Pumped, 500 psi	C-8	70	.800		124	36.50	12.05	172.55	204
3660	650 psi		70	.800		139	36.50	12.05	187.55	221
3670	750 psi		70	.800		209	36.50	12.05	257.55	297
3800	Footings (3000 psi), spread under 1 C.Y.	C-14C	28	4		193	196	.96	389.96	510
3825	1 C.Y. to 5 C.Y.		43	2.605		227	128	.63	355.63	445
3850	Over 5 C.Y.		75	1.493		212	73	.36	285.36	345
3900	Footings, strip (3000 psi), 18" x 9", unreinforced	C-14L	40	2.400		149	115	.67	264.67	340
3920	18" x 9", reinforced	C-14C	35	3.200		174	157	.77	331.77	430
3925	20" x 10", unreinforced	C-14L	45	2.133		146	103	.60	249.60	315
3930	20" x 10", reinforced	C-14C	40	2.800		166	137	.67	303.67	390
3935	24" x 12", unreinforced	C-14L	55	1.745		143	84	.49	227.49	286
3940	24" x 12", reinforced	C-14C	48	2.333		164	114	.56	278.56	355
3945	36" x 12", unreinforced	C-14L	70	1.371		139	66	.38	205.38	253
3950	36" x 12", reinforced	C-14C	60	1.867		158	91.50	.45	249.95	310
4000	Foundation mat (3000 psi), under 10 C.Y.		38.67	2.896		231	142	.70	373.70	470
4050	Over 20 C.Y.		56.40	1.986		205	97.50	.48	302.98	375
4200	Wall, free-standing (3000 psi), 8" thick, 8' high	C-14D	45.83	4.364		187	223	19	429	560
4250	14' high		27.26	7.337		218	375	32	625	840
4260	12" thick, 8' high		64.32	3.109		170	159	13.55	342.55	440
4270	14' high		40.01	4.999		180	256	21.50	457.50	605
4300	15" thick, 8' high		80.02	2.499		164	128	10.85	302.85	385
4350	12' high		51.26	3.902		164	200	16.95	380.95	500
4500	18' high		48.85	4.094		184	210	17.80	411.80	535
4520	Handicap access ramp (4000 psi), railing both sides, 3' wide	C-14H	14.58	3.292	L.F.	370	166	1.81	537.81	655
4525	5' wide		12.22	3.928		380	198	2.16	580.16	720
4530	With 6" curb and rails both sides, 3' wide		8.55	5.614		380	282	3.09	665.09	845
4535	5' wide		7.31	6.566		385	330	3.61	718.61	930
4650	Slab on grade (3500 psi), not including finish, 4" thick	C-14E	60.75	1.449	C.Y.	147	72	.43	219.43	270
4700	6" thick	"	92	.957	"	141	47.50	.29	188.79	228
4701	Thickened slab edge (3500 psi), for slab on grade poured									
4702	monolithically with slab; depth is in addition to slab thickness;									
4703	formed vertical outside edge, earthen bottom and inside slope									
4705	8" deep x 8" wide bottom, unreinforced	C-14L	2190	.044	L.F.	3.99	2.11	.01	6.11	7.60
4710	8" x 8", reinforced	C-14C	1670	.067		6.40	3.29	.02	9.71	12.05
4715	12" deep x 12" wide bottom, unreinforced	C-14L	1800	.053		8.20	2.56	.01	10.77	12.90

City Cost Indexes

DIVISION		INDIANA																	
		ANDERSON			BLOOMINGTON			COLUMBUS			EVANSVILLE			FORT WAYNE			GARY		
		460			474			472			476 - 477			467 - 468			463 - 464		
MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL		
015433	CONTRACTOR EQUIPMENT	97.4	97.4			83.9	83.9			83.9	83.9			113.7	113.7			97.4	97.4
0241, 31 - 34	SITE & INFRASTRUCTURE, DEMOLITION	99.4	93.7	95.5	87.3	92.1	90.6	84.0	91.9	89.5	92.7	121.2	112.6	100.5	93.6	95.7	100.1	97.3	98.2
0310	Concrete Forming & Accessories	96.5	79.6	82.1	101.2	80.1	83.2	95.2	79.9	82.2	94.4	80.8	82.8	94.4	75.7	78.5	96.6	112.6	110.2
0320	Concrete Reinforcing	95.6	85.4	90.4	89.4	85.1	87.2	89.8	87.2	88.5	97.9	83.4	90.5	95.6	80.2	87.8	95.6	112.7	104.3
0330	Cast-in-Place Concrete	103.7	77.1	93.8	99.3	76.2	90.7	98.8	74.1	89.6	94.9	85.7	91.5	110.2	76.2	97.6	108.4	113.7	110.4
03	CONCRETE	91.8	80.3	86.7	97.1	79.2	89.2	96.4	78.7	88.6	97.3	83.1	91.0	94.7	77.4	87.0	94.0	112.7	102.3
04	MASONRY	87.3	75.6	80.1	88.1	72.0	78.1	87.9	73.1	78.7	83.7	78.9	80.7	90.4	72.9	79.6	88.7	109.2	101.3
05	METALS	98.8	89.1	95.9	99.5	74.2	91.9	99.6	74.4	91.9	92.5	84.0	90.0	98.8	87.2	95.3	98.8	105.1	100.7
06	WOOD, PLASTICS & COMPOSITES	97.5	79.8	87.9	112.3	80.6	95.1	106.6	80.4	92.4	93.2	79.9	86.0	97.2	76.0	85.6	94.7	111.0	103.5
07	THERMAL & MOISTURE PROTECTION	109.6	77.2	95.5	96.7	77.7	88.5	96.1	78.1	88.2	100.9	84.0	93.6	109.4	78.9	96.1	108.1	106.1	107.2
08	OPENINGS	95.3	78.0	91.3	99.7	78.6	94.8	95.9	79.0	92.0	93.8	78.2	90.2	95.3	73.2	90.1	95.3	114.2	99.7
0920	Plaster & Gypsum Board	104.6	79.5	88.1	98.6	80.7	86.8	95.5	80.6	85.7	94.0	79.0	84.1	103.7	75.6	85.2	97.3	111.6	106.7
0950, 0980	Ceilings & Acoustic Treatment	91.9	79.5	83.5	79.6	80.7	80.4	79.6	80.6	80.3	83.4	79.0	80.4	91.9	75.6	80.8	91.9	111.6	105.2
0960	Flooring	95.1	77.5	90.0	99.1	83.1	94.4	94.0	83.1	90.9	94.0	73.8	88.1	95.1	73.5	88.9	95.1	114.3	100.7
0970, 0990	Wall Finishes & Painting/Coating	94.0	67.6	78.4	85.4	79.5	81.9	85.4	79.5	81.9	91.0	86.6	88.4	94.0	72.1	81.0	94.0	121.4	110.2
09	FINISHES	91.8	77.9	84.2	90.1	80.7	85.0	88.2	80.6	84.0	88.8	79.9	84.0	91.5	75.1	82.5	90.6	113.9	103.3
COVERS	DIVS. 10 - 14, 25, 28, 41, 43, 44, 46	100.0	89.2	97.6	100.0	85.8	96.9	100.0	85.8	96.9	100.0	93.1	98.5	100.0	89.1	97.6	100.0	105.1	101.1
21, 22, 23	FIRE SUPPRESSION, PLUMBING & HVAC	99.9	78.7	91.4	99.8	78.9	91.3	96.3	78.6	89.2	100.0	80.4	92.0	99.9	73.8	89.4	99.9	105.1	102.0
26, 27, 3370	ELECTRICAL, COMMUNICATIONS & UTIL.	86.5	85.2	85.8	99.2	86.6	92.8	98.4	87.0	92.6	95.2	83.4	89.2	87.2	76.7	81.8	98.1	110.7	104.5
MF2016	WEIGHTED AVERAGE	95.9	81.8	89.8	97.7	80.3	90.3	96.1	80.4	89.3	95.4	84.8	90.9	96.4	78.2	88.6	97.2	108.3	102.0

DIVISION		INDIANA																	
		INDIANAPOLIS			KOKOMO			LAFAYETTE			LAWRENCEBURG			MUNCIE			NEW ALBANY		
		461 - 462			469			479			470			473			471		
MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL		
015433	CONTRACTOR EQUIPMENT	85.3	85.3			97.4	97.4			83.9	83.9			103.6	103.6			95.5	93.3
0241, 31 - 34	SITE & INFRASTRUCTURE, DEMOLITION	100.2	90.9	93.7	95.8	93.6	94.3	84.8	92.0	89.9	82.3	107.3	99.8	87.3	92.6	91.0	79.5	94.5	89.9
0310	Concrete Forming & Accessories	101.2	85.1	87.5	99.7	78.0	81.2	92.6	80.9	82.6	91.6	76.6	78.9	92.3	79.1	81.0	90.4	77.4	79.3
0320	Concrete Reinforcing	95.6	87.6	91.5	86.4	87.3	86.9	89.4	85.3	87.3	88.7	77.2	82.9	98.9	85.3	92.0	90.0	83.0	86.4
0330	Cast-in-Place Concrete	100.6	84.7	94.7	102.7	80.9	94.6	99.4	80.0	92.2	92.9	74.4	86.0	104.3	76.2	93.9	95.9	74.3	87.9
03	CONCRETE	97.5	84.7	91.8	88.9	81.2	85.5	96.7	80.9	89.7	89.8	76.6	84.0	95.3	79.7	88.4	95.2	77.5	87.4
04	MASONRY	88.0	79.1	82.5	87.0	73.6	78.7	93.3	75.5	82.3	73.2	71.8	72.3	89.8	75.7	81.1	79.8	68.1	72.6
05	METALS	96.1	75.7	89.9	95.2	89.6	93.5	97.9	74.4	90.8	94.5	84.4	91.4	101.3	88.9	97.6	96.5	82.0	92.1
06	WOOD, PLASTICS & COMPOSITES	98.6	86.0	91.8	100.8	77.4	88.1	103.6	81.5	91.6	91.3	76.5	83.3	104.9	79.4	91.0	93.7	78.6	85.5
07	THERMAL & MOISTURE PROTECTION	99.8	81.4	91.8	108.5	76.5	94.6	96.1	79.4	88.8	101.7	76.2	90.6	99.2	78.5	90.2	88.2	72.2	81.3
08	OPENINGS	104.1	82.2	99.0	90.3	77.3	87.3	94.4	78.9	90.8	95.8	73.8	90.7	93.0	77.8	89.5	93.4	77.5	89.7
0920	Plaster & Gypsum Board	96.4	85.8	89.4	109.5	77.1	88.1	93.3	81.7	85.7	71.9	76.5	74.9	94.0	79.5	84.5	91.9	78.5	83.0
0950, 0980	Ceilings & Acoustic Treatment	94.9	85.8	88.7	91.9	77.1	81.9	76.2	81.7	80.0	86.0	76.5	79.5	79.6	79.5	79.6	83.4	78.5	80.1
0960	Flooring	96.9	81.8	92.5	99.0	91.3	96.8	93.0	81.8	89.8	69.0	82.9	73.1	93.4	77.5	88.8	91.4	55.8	81.1
0970, 0990	Wall Finishes & Painting/Coating	99.3	79.5	87.6	94.0	69.7	79.6	85.4	83.5	84.3	86.2	74.5	79.3	85.4	67.6	74.8	91.0	68.0	77.4
09	FINISHES	96.0	84.2	89.6	93.4	79.6	85.8	86.9	81.5	83.9	78.6	77.7	78.1	87.4	77.6	82.0	88.0	72.3	79.5
COVERS	DIVS. 10 - 14, 25, 28, 41, 43, 44, 46	100.0	90.6	97.9	100.0	86.4	97.0	100.0	88.4	97.5	100.0	84.8	96.6	100.0	88.1	97.4	100.0	83.5	96.4
21, 22, 23	FIRE SUPPRESSION, PLUMBING & HVAC	99.9	79.7	91.7	96.5	78.8	89.3	96.3	77.9	88.9	97.2	74.5	88.0	99.8	78.6	91.2	96.5	76.0	88.2
26, 27, 3370	ELECTRICAL, COMMUNICATIONS & UTIL.	101.9	87.0	94.3	90.9	79.1	84.9	97.8	80.5	89.0	93.1	72.9	82.9	91.0	75.9	83.3	93.7	76.4	84.9
MF2016	WEIGHTED AVERAGE	98.7	83.0	92.0	94.1	81.0	88.4	95.8	80.1	89.1	92.6	78.5	86.5	96.1	80.3	89.3	93.9	77.2	86.7

DIVISION		INDIANA																	
		SOUTH BEND			TERRE HAUTE			WASHINGTON			BURLINGTON			CARROLL			CEDAR RAPIDS		
		465 - 466			478			475			526			514			522 - 524		
MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL	MAT.	INST.	TOTAL		
015433	CONTRACTOR EQUIPMENT	108.9	108.9			113.7	113.7			113.7	113.7			101.4	101.4			98.2	98.2
0241, 31 - 34	SITE & INFRASTRUCTURE, DEMOLITION	99.3	94.3	95.8	94.4	121.6	113.4	94.4	121.8	113.5	98.5	96.5	97.1	87.8	97.3	94.4	100.1	96.0	97.3
0310	Concrete Forming & Accessories	95.5	78.1	80.7	95.2	79.2	81.6	96.2	82.1	84.2	94.4	96.8	96.4	81.9	79.8	80.1	100.5	86.3	88.4
0320	Concrete Reinforcing	95.8	86.0	90.8	97.9	85.4	91.6	90.5	84.9	87.7	94.4	100.6	97.6	95.1	88.3	91.6	95.1	82.5	88.7
0330	Cast-in-Place Concrete	103.6	79.9	94.8	91.8	80.6	87.7	99.9	86.0	94.7	107.9	56.4	88.7	107.9	84.4	99.2	108.2	85.9	99.9
03	CONCRETE	91.0	81.7	86.9	100.2	81.0	91.7	106.0	84.1	96.3	93.6	83.7	89.2	92.4	83.7	88.5	93.7	86.1	90.3
04	MASONRY	92.9	75.6	82.2	91.0	74.8	81.0	83.9	78.6	80.7	99.7	73.4	83.5	101.3	74.0	84.4	105.3	81.7	90.7
05	METALS	102.3	104.8	103.0	93.2	85.2	90.8	87.7	85.2	87.0	85.5	99.9	89.8	85.5	95.8	88.6	87.9	93.9	89.7
06	WOOD, PLASTICS & COMPOSITES	95.8	77.2	85.7	95.5	78.9	86.5	95.9	81.5	88.1	93.0	101.0	97.4	78.7	82.9	81.0	100.4	86.1	92.6
07	THERMAL & MOISTURE PROTECTION	102.4	80.4	92.8	101.0	81.4	92.5	100.9	84.2	93.6	103.9	79.2	93.1	104.2	76.3	92.1	105.0	82.3	95.1
08	OPENINGS	95.8	77.7	91.6	94.3	77.5	90.4	91.2	79.4	88.4	96.5	98.6	97.0	101.0	82.2	96.6	101.5	83.6	97.3
0920	Plaster & Gypsum Board	94.5	76.9	82.9	94.0	78.0	83.4	94.3	80.6	85.3	105.0	101.2	102.5	100.5	82.6	88.7	110.1	86.0	94.3
0950, 0980	Ceilings & Acoustic Treatment	90.3	76.9	81.2	83.4	78.0	79.7	79.2	80.6	80.1	95.0	101.2	99.2	95.0	82.6	86.6	97.5	86.0	89.7
0960	Flooring	93.6	89.1	92.3	94.0	78.2	89.4	94.9	79.3	90.3	95.3	71.4	88.4	89.6	82.2	87.5	109.6	87.1	103.0
0970, 0990	Wall Finishes & Painting/Coating	88.9	84.7	86.4	91.0	81.9	85.6	91.0	86.6	88.4	92.3	87.5	89.5	92.3	85.8	88.4	93.9	72.6	81.3
09	FINISHES	90.0	80.5	84.9	88.8	79.2	83.6	88.6	81.9	85.0	92.4	92.4	92.4	88.7	81.2	84.6	97.8	85.1	90.9
COVERS	DIVS. 10 - 14, 25, 28, 41, 43, 44, 46	100.0	90.3	97.9	100.0	90.5	97.9	100.0	93.3	98.5	100.0	92.1	98.3	100.0	85.8	96.9	100.0	94.0	98.7
21, 22, 23	FIRE SUPPRESSION, PLUMBING & HVAC	99.9	76.7	90.5	100.0	78.2	91.2	96.5	80.4	90.0	96.7	85.7	92.2	96.7	72.6	86.9	100.1	83.0</	

OUC DR 1-13

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide Petitioner's asset register as of December 31, 2018. (An asset register is a report listing each asset of the utility and includes information regarding the date the asset was added, the original cost of the asset, the asset classification (treatment plant, collection mains, etc.), and a description of the asset.)

Information Provided:

See attached.

Attachments:

OUC DR 1-13.xlsx

HOWARD COUNTY UTILITIES

Asset Number	Asset Classification	Date Purchased	Description of Asset	Purchase Price
H0802	353	7-May-08	Land and Land Rights	\$ 138,975.00
H0800	351	31-Dec-08	Organization Costs	\$ 33,450.00
H0801	361	8-May-08	Collection Sewers - Gravity	\$ 63,263.00
H0801-01	371	7-Nov-08	Pumping Equipment	\$ 6,180.00
H0801-01	389	26-Aug-08	Other Plant and Miscellaneous Equipment	\$ 2,888.00
H1002	389	20-Oct-10	Other Plant and Miscellaneous Equipment	\$ 2,140.00
H1105	354	31-Dec-11	Structures and Improvements	\$ 200,000.00
H1105	361	31-Dec-11	Collection Sewers - Gravity	\$ 200,000.00
H1105	371	31-Dec-11	Pumping Equipment	\$ 100,000.00
H1105	380	31-Dec-11	Treatment and Disposal Equipment	\$ 305,550.00
H1105	389	31-Dec-11	Other Plant and Miscellaneous Equipment	\$ 30,000.00
H1203	371	16-Feb-12	Pumping Equipment	\$ 1,503.00
H1204	361	31-Dec-12	Collection Sewers - Gravity	\$ 330,407.00
H1204	371	31-Dec-12	Pumping Equipment	\$ 130,570.00
H1204	380	31-Dec-12	Treatment and Disposal Equipment	\$ 330,000.00
H1501	371	18-Sep-15	Pumping Equipment	\$ 854.00
H1701	361	22-May-17	Collection Sewers - Gravity	\$ 2,854.00
H1801	371	21-Nov-18	Pumping Equipment	\$ 885.55
H1802	371	3-Dec-18	Pumping Equipment	\$ 2,529.90

OUCC DR 2-4

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide a copy of the Record Drawings for the HCU-2 wastewater treatment plant and the influent and effluent sewers. If no Record Drawings were prepared, so state.

Information Provided:

There were no Record Drawings prepared for HCU-2 wastewater treatment plant.

OUCC DR 2-5

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state or provide the equipment names, manufacturers, model numbers, catalog information, and in service dates for all wastewater treatment, control, and monitoring equipment installed in the new wastewater treatment plant. (For purposes of this data request, Petitioner need not supply information on items that did not have an original cost above \$2,000.)

Information Provided:

See attached HCU Project Specifications.

Attachments:

OUCC 2-5.zip (contains 50 files)

OUCC DR 2-6

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For each piece of treatment, control, and monitoring equipment identified in the preceding data request, please provide copies of all original vendor invoices.

Information Provided:

Petitioner did not receive invoices for each of the items identified in 2-5. The plant was constructed pursuant to the affiliate agreement approved in Cause No. 43294. Invoices are attached.

Attachments:

OUCC 2-6.pdf

OUCC DR 2-7

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Reference Petitioner's response to OUCC Data Request 1-13. For the \$63,263 of Collection Sewers - Gravity (Asset Number H0801, Asset Class 361) purchased on May 8, 2008, please describe all gravity sewer improvements that were made and provide documentation supporting the asset addition cost claimed. Please also identify which specific sections of gravity sewers were addressed (e.g. identify sewer length, sewer diameter, pipe material, and manhole numbers).

Information Provided:

The \$63,263 is associated with the original plant purchase. The original sewer lines and engineering fees at the time of purchase. The utility was purchased out of receivership and pursuant to court order. The records requested were not received from the prior owners.

Please note that in closer examination of questions 2-7 through 2-19, we have discovered an error in classifying a few of the assets. Although the total dollars have not changed, the individual allocations have. A brief spreadsheet showing the changes is attached.

Attachments:

OUCC 2-7.xlsx

Howard County Utilities
Cause No. 45283-U
OUCC Data Request 2-7

In closer examination of questions 2-7 through 2-19, we have discovered we made an error in classifying some of our assets. Although the total dollars have not changed, the individual dollars per classification have changed. We have included a brief spreadsheet to show these changes.

IURC

Asset Class	Original Amt Posted	New Class	New Amt Posted
361	\$ 63,263	361	\$ 63,263
371	\$ 6,180	371	\$ 6,180
389	\$ 2,888	389	\$ 2,888
389	\$ 2,140	389	\$ 2,140
354	\$ 200,000	354	\$ 448,751
361	\$ 200,000	361	\$ 217,899
371	\$ 100,000	371	\$ 168,900
380	\$ 305,550	380	\$ -
389	\$ 30,000	389	\$ -
371	\$ 1,503	371	\$ 1,503
354	\$ -	354	\$ 329,343
361	\$ 330,407	361	\$ -
371	\$ 130,570	371	\$ -
355	\$ -	355	\$ 49,500
381	\$ -	381	\$ 58,066
380	\$ 330,000	380	\$ 354,068
TOTAL	\$ 1,702,501		\$ 1,702,501

OUCR DR 2-8

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please reference Petitioner's Response to OUCC Data Request 1-13. For the \$200,000 of Structures and Improvements (Asset Number H1105, Asset Class 354) purchased on December 31, 2011, please identify each structure and improvement that was purchased and its associated cost.

Information Provided:

The correct amount of structures and improvements placed in service in 2011 is \$448,751. The following items are included in that cost:

- Tree Removal (3.0 acres)
- Plant Influent Gravel Road to Control Building
- Gravel Road from Control Building to Treatment Plant
- Concrete Tank divided into 6 chambers (86-ft x 48-ft)

OUCR DR 2-9

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$200,000 of Collection Sewers - Gravity (Asset Number H1105, Asset Class 361) purchased on December 31, 2011, please identify which gravity sewers were included (e.g. identify sewer length, sewer diameter, pipe material, and manhole numbers).

Information Provided:

The amount that should be allocated to Collection Sewers-Gravity in 2011 is \$217,899 and includes the following:

15" PVC SDR 35 Pipe (1,700 ft)
Manholes (5)

OUCR DR 2-10

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$100,000 of Pumping Equipment (Asset Number H1105, Asset Class 371) purchased on December 31, 2011, please identify each pump that was purchased and its associated cost.

Information Provided:

The amount that was actually coded to Pumping Equipment in 2011 is \$168,900 and includes the following:

- New pumps and couplings (2)
- Valve Pit Cover with Access Cover and Ladder
- Lift Station Concrete Wet Well
- Lift Station Concrete Valve Pit
- Lift Station Pipe, Fittings and Valves
- Force Main (8" PVC SDR21, 80-ft)
- Lift Station Electrical Service

OUCR DR 2-11

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$305,550 of Treatment and Disposal Equipment (Asset Number H1105, Asset Class 380) purchased on December 31, 2011, please identify each piece of treatment and disposal equipment that was purchased and its associated cost.

Information Provided:

This was incorrectly classified. It was reallocated to Structures and Improvements, Collection Sewers-Gravity, and Pumping Equipment.

OUC DR 2-12

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$30,000 of Other Plant and Miscellaneous Equipment (Asset Number H1105, Asset Class 389) purchased on December 31, 2011, please identify each piece of Other Plant and Miscellaneous Equipment that was purchased and its associated cost.

Information Provided:

This was incorrectly classified. It has been reallocated to Pumping Equipment.

OUCR DR 2-13

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$1,503 of Pumping Equipment (Asset Number H1203, Asset Class 371) purchased on February 16, 2012, please identify each pump that was purchased and its associated cost.

Information Provided:

(1) Zoeller Pump, Model #G6294

OUC DR 2-14

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$130,570 of Collection Sewers - Gravity (Asset Number H1204, Asset Class 361) purchased on December 31, 2012, please identify which gravity sewers were included (e.g. identify sewer length, sewer diameter, pipe material, and manhole numbers).

Information Provided:

We believe there was a typo in your question. The code we actually used for the \$130,570 is 371 (Pumping Equipment). This was incorrectly classified and has been reclassified to Code 355 (\$49,500) and Code 381 (\$58,066) and Code 354 (\$23,004). Items coded to 354 were answered on DR 2-16.

OUCR DR 2-15

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$200,000 of Pumping Equipment (Asset Number H1204, Asset Class 371) purchased on December 31, 2012, please identify each pump that was purchased and its associated cost.

Information Provided:

We believe there was a typo in the question. The amount and code we actually used for this asset was \$330,407 and 361 (Collection Sewers - Gravity). This was incorrectly classified originally. It has been reclassified to Structures and Improvements. The amount coded to Class 354 should be \$329,343 and includes the following items:

- Control Building
- Blower Building
- Gravel Driveway around Treatment Plant
- Fence
- Plant Main Control Panel
- Effluent Flow Meter

OUCC DR 2-16

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$330,000 of Treatment and Disposal Equipment (Asset Number H1204, Asset Class 380) purchased on December 31, 2012, please identify each piece of treatment and disposal equipment that was purchased and its associated cost.

Information Provided:

This amount was incorrectly classified and has been reclassified to \$354,068 and includes the following items:

- Macerator
- Aeration Blowers (3)
- Sludge Holding Tank Blowers (2)
- Equalization Tank Blower
- Surge Pumps (2)
- Aeration Piping/diffusers
- Tank Piping
- Weirs, Baffles, Flow Divider Box
- UV Unit
- Grating and Handrail

OUCR DR 2-17

DATA REQUEST

Howard County Utilities

Cause No. 45283-U

Information Requested:

For the \$2,140 of Other Plant and Miscellaneous Equipment (Asset Number H1002, Asset Class 389) purchased on October 20, 2010, please identify each piece of Other Plant and Miscellaneous Equipment that was purchased and its associated cost.

Information Provided:

(1) 7.5HP Air Compressor

OUCR DR 2-18

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$2,888 of Other Plant and Miscellaneous Equipment (Asset Number H0801-01, Asset Class 389) purchased on August 26, 2008, please identify each piece of Other Plant and Miscellaneous Equipment that was purchased and its associated cost.

Information Provided:

(1) Sutorbilt Blower 5M

OUCG DR 2-19

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the \$6,188 of Pumping Equipment (Asset Number H0801-01, Asset Class 371) purchased on November 7, 2008, please identify each pump that was purchased and its associated cost.

Information Provided:

(1) Zoeller Pump, Model # G6682

OUC DR 4-5

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Regarding completion and start-up of the new influent sewer and Howard County Utilities wastewater treatment plant (“HCU-2 WWTP”), please state each of the following dates:

- a. Pre-construction conference date
- b. Construction start date
- c. Start date for construction of the influent gravity sewer
- d. Completion date for the influent gravity sewer
- e. Substantial completion date of construction
- f. Date the punch list was prepared
- g. Start-up date for full operation of the HCU-2 WWTP
- h. Final completion date of construction

Information Provided:

- a) None Required
- b) 13-Apr-2009
- c) 13-Apr-2009
- d) 10-May-2011
- e) 10-May-2011
- f) Did not keep these records
- g) 10-May-2011
- h) Unknown.

OUCC DR 4-18

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please indicate the actual construction schedule for the HCU-2 WWTP Project including major milestone dates (e.g. Notice to Proceed, Substantial Completion, Final Completion, etc.) and the total number of days worked.

Information Provided:

Substantial Completion Date: 10-May-2011

Final Completion Date: Unknown

Total Number of Days Worked: 758

Note that Petitioner has not included any allowance for funds used during construction.

OUCC DR 4-19

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please identify all weather delay dates when no work was performed on the HCU-2 WWTP project.

Information Provided:

HCU lost 447 days to inclement weather during this project. Note that Petitioner has not included any allowance for funds used during construction.

OUCC DR 4-20

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please identify all other days, which were not weather delay dates identified in the preceding data request, when no work was performed on the HCU-2 WWTP project. Please also state the reason that no work was performed.

Information Provided:

This information was not kept. Note that Petitioner has not included any allowance for funds used during construction.

OUCR DR 4-23

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Regarding design engineering, construction engineering, construction inspection and testing services for the HCU-2 WWTP project, please state or provide the following:

- a. Please state who performed design engineering, construction engineering, construction inspection and testing services respectively including the firm name.
- b. If third parties provided design engineering, construction engineering, construction inspection and testing services, please provide copies of the contracts with HCU for such services.
- c. Please provide copies of the daily reports for the HCU-2 WWTP project prepared by the construction inspector. If no such reports were made, so state and provide the dates the construction inspectors observed construction.
- d. On what dates was the design engineer present during construction.

Information Provided:

- a) Design Engineering – Lakeland Innovatech. Construction Engineering, Inspection and Testing services were not provided.
- b) No contracts were prepared or issued to third parties for engineering services of any kind.
- c) No construction reports were prepared.
- d) No records were maintained for jobsite visits by the design engineer or other professionals.

OUCC DR 4-24

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of testing reports for the HCU-2 WWTP Project that were completed during construction.

Information Provided:

Alt Witzig tested concrete to verify that the strength met design capacity. Once passed, those records were not kept.

OUCC DR 4-30

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state the current (2019) connected population served by the HCU wastewater system and provide supporting documentation or the basis for the current connected population estimate and the 2020 design year population of 2,356 people listed in the 2009 Construction Permit. If Petitioner does not know the current connected population, so state, and give HCU's best estimate for the current population.

Information Provided:

HCU current (2019) has 212 homes connected along with the Green Acres Golf Clubhouse; therefore, there is an estimated connected population equivalent of 868 (4 P.E. per house and 20 P.E. for Clubhouse.)

The replaced original WWTP was designed for an average daily flow (ADF) of 100,000 GPD with only a 50,000 GPD plant in service which was in hydraulic overload; therefore, the current (2009) population equivalent was listed as 1,000 to match the previously approved plant.

The Agreed Order Compliance Plan required a plant of 200,000 gpd. The 2020 design P.E. of 2,356 was determined by HCU's consulting engineer who based his estimate on reviewing the existing subdivision's availability of building lots. Federal, State and Local census data and discussions with county planning commissioners, local realtors, developers, etc. were also used.

HCU did not request from its consulting engineer any written documentation for his estimates.

OUCC DR 5-2

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Regarding the HCU-2 WWTP Project design, please state the following:

- a. Design flows allocated for new lift stations and new gravity sewers from future developments and customers. If future flows were not considered in the HCU-2 WWTP Project design, so state.
- b. Design flows allocated for infiltration / inflow (“I & I”), domestic flows, commercial flows, and flows from the golf course in the 200,000 gallons per day (“gpd”) average design flow capacity.
- c. Design flows allocated for I & I, domestic flows, commercial flows, and flows from the golf course in the 400,000 gallons per day (“gpd”) peak wet weather flow capacity.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

The HCU-2WWTP was designed for the following flows:

Average Daily Design flow (ADF)	200,000 GPD
Peak Dry Weather (PDWF)	300,000 GPD

Peak Wet Weather Flow (PWWF) 400,000 GPD

It should be noted that at the time HCU purchased this utility, no one knew what the peak flow from the customer base was, given the frequency of overflows under prior ownership.

OUCC DR 5-4

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Have estimates of infiltration and inflow (“I & I”) from the HCU sewer system been made by or on behalf of HCU? If so, please provide copies of the estimates and identify who made the estimates and the date each estimate was made.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No estimates have been made because rates have never supported this sort of study.

OUC DR 5-5

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Have infiltration and inflow (I&I) studies been conducted by or on behalf of HCU in the last ten years? If so, please state who conducted each I&I Study and provide copies of the studies. If no studies were conducted, so state.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No estimates have been made because rates have never supported this sort of study.

OUCC DR 5-6

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Have temporary flow meters been installed in the collection system by or on behalf of HCU in the last ten years? If so, please indicate the monitoring location(s). If no flow meters were installed, so state.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No flow meters were installed in the collection system within the last ten (10) years because rates have never supported this sort of study.

OUC DR 5-7

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state whether HCU identified any segment of the collection system that experiences surcharging, and if so, please explain what HCU has done to address the surcharging.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No.

OUC DR 5-8

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state whether HCU has any plans to identify and reduce I&I in the next five years, including proposed annual budgets for I&I reduction.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No. There are no plans to add capacity.

OUCR DR 5-9

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state whether HCU has identified defects in specific manholes and sewer locations where infiltration and inflow is entering HCU's collection system.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: "to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure." Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

Whenever HCU inspects manholes on an "as required" basis and if any defects are found, they are immediately repaired.

OUCR DR 5-10

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

How many manholes are in HCU's collection system? Please provide the inventory list HCU uses to track its manholes, including manhole identification numbers or individual references for each manhole. If HCU relies on a database for this purpose, please provide a printout conforming with the foregoing request.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: "to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure." Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No manhole inventory has been conducted.

OUC DR 5-11

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state the number of manholes in HCU's system with a top of casting that is below the 100-year flood elevation.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: "to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure." Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

HCU has never checked the manhole lids elevations to determine if any are below the 100-year flood elevation. Any manhole covers which HCU believed were in the flood plan have bolted and gasket covers.

OUC DR 5-12

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state how many manholes are completely inspected every year and what percentage of HCU's sewer lines are cleaned and televised each year." Please provide any supporting documentation for the manhole inspections and sewer cleaning and televising.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: "to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure." Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

HCU has no documentation.

OUC DR 5-13

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state whether manhole inspections and work on HCU manholes are performed by HCU staff, outside contractors, or affiliate staff. If work is performed by outside contractors or affiliate staff, please identify those contractors or affiliates.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

HCU does not keep track of these inspections.

OUCR DR 5-14

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of HCU's annual budget showing the annual amount allocated for manhole rehabilitation since the acquisition. If no money was budgeted for manhole rehabilitation, so state. For the same periods, show the amounts expended for manhole rehabilitation.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: "to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure." Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No budget because rates have never supported this sort of work.

OUCR DR 5-15

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of all studies, condition assessments, inspection reports, or rehabilitation reports prepared by or on behalf of HCU pertaining to HCU's manholes. If no studies, assessments, or inspections were conducted by or on behalf of HCU, so state. If no studies or reports exist, so state.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: "to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure." Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

No studies, condition assessments, inspection reports, or rehabilitation reports were prepared by HCU or any outside contractors because rates have never supported such a study.

OUCC DR 5-16

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Regarding the Compliance Plan, prepared by or on behalf of Howard County Utilities that was submitted to the Indiana Department of Environmental Management (“IDEM”) under the Agreed Order, please provide the following:

- a. Copy of the original Compliance Plan prepared by or on behalf of Howard County Utilities that was submitted to the Indiana Department of Environmental management (“IDEM”) on April 21, 2007.
- b. Copies of all IDEM comments on HCU’s Compliance Plan
- c. Compliance Plan revisions made by HCU in response to IDEM comments
- d. Compliance Plan revisions made by HCU in response to Indiana Utility Regulatory Commission requirements under Cause No. 43294

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Further objection: The question misstates what is the Compliance Plan. The Compliance Plan physically is attached and incorporated in the Agreed Order as Exhibit A. It was not submitted “under” the Agreed Order; it was part of the Agreed Order at the time it was

signed. This was a condition to the Purchase Agreement under which HCU acquired the utility.

Information Provided:

HCU does not have readily available all correspondence regarding the Compliance Plan. The OUCC is fully capable of searching the virtual file cabinet to determine whether there are any documents there, and this would be done without further cost to HCU's customers.

OUCC DR 5-17

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state whether FTDC performs sewer cleaning and sewer televising services for clients other than ASU. Please state the names of FTDC personnel who perform sewer televising services for HCU.

Objection:

Petitioner objects to the data request on the grounds and to the extent that it is overbroad, unduly burdensome and beyond the scope of a Small-U proceeding. The purpose of the Small U process, as explained by the Commission in its brochure, is: “to provide small utilities with an opportunity to increase rates and charges through a less costly regulatory procedure.” Petitioner has heeded the advice from the Commission in *Switzerland Co. Nat. Gas Co.*, Cause No. 45117 (IURC 4/17/2019) to investigate and consider the Small U process for this rate case and, in order to save its customers the cost of rate case expense, elected to file this case as a Small U. This is now the 5th set of discovery requests from the OUCC, many of which are seeking records that are approximately ten years old concerning a process for constructing the treatment plant that was worked out in advance of Petitioner closing on the acquisition of this utility. The discovery has been too much and frankly, will serve to discourage other similarly situated small utilities from using the process that is intended by the Commission to mitigate exactly what has occurred in this case.

Information Provided:

It does not. HCU does not know the answer to the second part of the question.

Received: March 11, 2020

OUCC DR 6-1

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of the Hannum, Wagle & Cline (“HWC”) Engineering proposal and executed contract for preparing a construction cost estimate of the HCU-2 Wastewater Treatment Plant project (“HCU-2 WWTP project”).

Information Provided:

HCU has been unable to locate the contract. This has been well over ten years ago that they were selected pursuant to the process described in the Commission’s Order that was issued in 2008, a process in which the OUCC participated.

Received: March 11, 2020

OUCC DR 6-2

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please identify all engineering firms that were asked to provide cost proposals to prepare a construction cost estimate for the HCU-2 WWTP project. Please provide copies of the proposal solicitation letters to these firms that were made by or on behalf of HCU.

Information Provided:

We solicited the bid proposals from engineering firms to prepare a cost estimate for the plant construction. The OUCC helped provide some engineering firms and was copied on all of this paperwork. HCU no longer has these records.

Received: March 11, 2020

OUCC DR 6-3

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of all cost proposals received from the engineering firms identified in the preceding data request.

Information Provided:

See Response to OUCC DR 6-2.

Received: March 11, 2020

OUCC DR 6-4

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of all questions, requests for clarifications, communications, and correspondence received from HWC Engineering regarding the HCU-2 WWTP project, preparation of HWC's cost estimate, and estimate revisions.

Information Provided:

This was well over 10 years ago, and HCU cannot locate any such correspondence.

Received: March 11, 2020

OUCR DR 6-5

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of all communications, equipment vendor quotes, schedules, construction contract requirements, and instructions made or provided by or on behalf of HCU to HWC regarding the HCU-2 WWTP project for use in preparation of HWC's cost estimate.

Information Provided:

This was over 10 years ago, and HCU has been unable to locate any documents responsive to the request.

Received: March 11, 2020

OUCR DR 6-6

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state all assumptions that HCU required HWC Engineering to use to prepare HWC's cost estimate of the HCU-2 WWTP project. If no required assumptions were communicated by or on behalf of HCU to HWC, so state.

Information Provided:

HWC was provided the plans and specifications, as set forth in the process approved by the Commission. There were no further assumptions required.

Received: March 11, 2020

OUCC DR 6-7

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Did FTDC place earth fill around the lift station and wastewater treatment tanks to raise the finished grade elevation above the original ground elevations? Please explain.

Information Provided:

No.

Received: March 11, 2020

OUCC DR 6-8

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Did HCU submit a Permit Application for Construction under the Flood Control Act to the Indiana Department of Natural Resources (“DNR”) or any other governmental agency for (1) construction of the HCU-2 wastewater treatment plant, (2) construction of the Wildcat Creek crossing, and/or (3) construction of the influent sanitary sewer to the HCU-2 wastewater treatment plant? If so, please provide a copy of the Permit Applications.

Information Provided:

- 1) The HCU-2 wastewater treatment plant was not constructed in the Wildcat Creek Floodplain.
- 2) Where the influent gravity sewer line was constructed in the Wildcat Floodway, it was done in accordance with 312 IAC 10-5-4 exception of licensing requirements for qualified utility line crossings in a floodway.

Received: March 11, 2020

OUCC DR 6-9

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

For the HCU-2 WWTP site, please provide copies of the following:

- (a) Site survey drawing showing pre-construction undisturbed ground elevations, and
- (b) Design drawing showing the post construction final grade elevations.

Information Provided:

This project was completed nearly 10 years ago. HCU has been unable to locate any responsive documents.

Received: March 11, 2020

OUCC DR 6-10

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Reference HCU's response to OUCC DR 4-2. Please provide a legible copy of Attachment 4-2.

Information Provided:

We believe we have provided the best legible copy that we have.

Received: March 11, 2020

OUCC DR 6-11

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

On what date was Attachment 4-2 originally prepared?

Information Provided:

The week of October 21, 2019.

Received: March 11, 2020

OUCC DR 6-12

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Reference HCU's response to OUCC DR 4-12 and Drawing No. C101 - "Sanitary Sewer Schematic Plan & Profile" (Attachment 4-12). Please provide the following:

- a. On what date was Drawing C101 originally prepared? (Note: This drawing is undated and lacks the Professional Engineer's stamp.)
- b. Was this drawing submitted to IDEM as part of the construction permit application?
- c. If this drawing was not submitted to IDEM, please explain why it was not and why this drawing was prepared.

Information Provided:

- a. This project was completed nearly 10 years ago. HCU has been unable to locate any documents identifying when HCU received the drawing.
- b. We are uncertain and still digging through files.
- c. The drawing was prepared for construction purposes and also see response to 6-12b.

Received: March 11, 2020

OUCC DR 6-13

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Reference (1) the one page attachment provided in response to OUCC DR 4-12 entitled “Sanitary Sewer Schematic Plan & Profile” or Drawing No. C101 (Attachment 4-12); and (2) the Design Drawings provided in response to OUCC DR 2-3 (Drawing No. 06-140-02). Each of the two drawings show the 15-inch sanitary sewer invert and top elevation for the Influent Lift Station Wet Well but with different elevations as indicated below:

Drawing No.	Drawing Date	Response to OUCC Data Request	15-inch sewer invert elevation at Lift Station (feet)	Top Elevation of Lift Station Wet Well (feet)
C101	Undated	4-12	709.62	728.31
06-140-02	6/9/2008	2-3	709.90	740.60

Please explain why different sewer inverts and top elevations for the Lift Station Wet Well are shown on the two drawings – (1) Drawing C101 and (2) Design Drawing 06-140-02.

Information Provided:

Drawing No. 06-140-02 shows the top of the influent lift station 12’-3 ½” above grade level whereas Drawing No. C101 shows the top of the lift station at grade level.

Received: March 11, 2020

OUCC DR 6-14

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please state the following:

- a. Actual invert elevation of the 15-inch influent sewer at the Lift Station
- b. Actual top elevation of the lift station.

Information Provided:

This data is unavailable at the current time.

Received: March 11, 2020

OUC DR 6-15

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide copies of the sanitary sewer mapping for the HCU collection system showing the sewer segments, sewer sizes, manholes, and asset numbers (e.g. MH-1, MH-2, etc.) that are used by or on behalf of HCU for basic maintenance activities such as collection system response to sewer backups, repairs, inspections, cleaning, and televising. If HCU does not have sanitary sewer maps, so state. Please also indicate if HCU has plans to create a sanitary sewer map.

Information Provided:

HCU is pulling the drawings we have and will be working to photocopy those. HCU did not receive a complete set of sanitary sewer drawings when it was purchased. Due to HCU operating at a severely low rate of return for the benefit of the customers, HCU has not spent any capital funds to get a complete set of drawings.

Received: March 11, 2020

OUCR DR 6-16

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

Please provide a copy of the missing attachment from HCU's response to DR 4-14.

Information Provided:

The reference to an attachment in the response is in error. There is no missing attachment.

Received: March 11, 2020

OUCC DR 6-17

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

HCU's response to OUCC DR 4-30 read in part that "The 2020 design P.E. of 2,356 was determined by HCU's consulting engineer who based his estimate on reviewing the existing subdivision's availability of building lots." Please state the total number of building lots determined by HCU's consulting engineer.

Information Provided:

Unknown.

Received: March 11, 2020

OUCR DR 6-18

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

In its original filing (Workpaper W-2), and in response to OUCC Data Request 1-14, Applicant provided a document titled “Allocation of Expenses Paid by Affiliated Entity (American Suburban Utilities)”. This document indicated the amount of certain operating expenses incurred by Applicant’s affiliate American Suburban Utilities (“ASU”) during fiscal year ended December 31, 2018, and how much of these expenses would be allocated to Howard County Utilities (“HCU”) based on number of customers. The document indicated that 4.08% of these costs would be allocated to HCU (219 HCU customers divided by total HCU and ASU customers of 5,373 equals 4.08%).

Please provide documentation that supports the following payroll and benefits related accounts for the costs incurred by Applicant’s affiliate ASU. Such documentation should include but not be limited to invoices, employment contracts, payroll registers, payroll tax returns and payroll subsidiary journals.

			ASU
		<u>Operating Expense</u>	<u>Portion</u>
		Wages	445,488
		Wages, Officers	194,000
		Employee Match/401K	85,599
		Payroll Taxes	53,034

Information Provided:

To be provided.

Received: March 11, 2020

OUCC DR 6-19

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

During the OUCC accounting field visit, Howard County Utility (“HCU”) staff informed OUCC staff that the only documentation supporting the various individual components of the HCU-2 project consisted of the 33 individual invoices from First Time Development which were billed to HCU and which were provided both during the field visit and in response to OUCC Data Request No. 2-6. HCU staff additionally indicated that they had no access to any of the supporting documentation used by First Time Development in generating the above referenced 33 invoices.

In response to OUCC Data Request No. 2-7, Applicant stated it had discovered an error in classifying a few of the assets, which required changes in the individual allocations of the assets and provided a spreadsheet (OUCC 2-7.xlsx) describing the changes in allocation.

- a. Please explain how HCU was able to determine the reclassification corrections referred to in Data Request Response No. 2-7 if the only detail HCU staff had access to regarding the individual components of the HCU-2 project were set forth on the 33 invoices received in response to OUCC Data Request No. 2-6, and provided to OUCC staff during their field visit.
- b. Please identify and provide all documents relied upon by HCU to discover the classification errors.
- c. Please identify and provide all documents relied upon by HCU to reclassify the assets.

Information Provided:

We used OUCC DR 4-1, Attachment 5 to help us discover those errors and to reclassify accordingly.

Received: March 11, 2020

OUCC DR 6-20

DATA REQUEST

**Howard County Utilities
Cause No. 45283-U**

Information Requested:

In response to OUCC Data Request No. 2-6, Applicant indicated that the following list represents all invoices received by Howard County Utility from its affiliate First Time Development for the HCU-2 project:

Invoice Date	Invoice Amount
6/5/09	10,000
7/1/09	4,000
7/16/09	5,000
11/13/09	50,000
1/15/10	8,000
2/2/10	5,500
2/28/10	4,000
4/6/10	9,000
5/18/10	5,000
7/1/10	300,000
7/15/11	250,000
11/5/10	10,000
12/29/10	20,000
2/8/11	12,000
2/10/11	20,000
3/8/11	6,000
4/22/11	6,000
5/25/11	6,000
7/1/11	40,000
10/1/11	10,000
2/1/12	20,000
2/16/12	10,000
4/2/12	10,000
5/21/12	12,000
7/23/12	10,000
8/13/12	5,000

8/23/12	5,000
9/3/12	5,000
9/24/12	6,500
10/8/12	4,000
10/22/12	5,000
10/12/12	55,000
12/3/2012	643,477

- a. For each of the above referenced invoices, please provide the documentation used by First Time Development to derive the amount being billed to Howard County Utilities. (Note: This documentation should include but not be limited to outside vendor invoices, sub-contractor invoices, purchase orders, delivery tickets, payroll cost records, sub-contractor percentage of completion requests and partial completion payment requests.
- b. For each of the above referenced invoices, please provide the documentation used by HCU to verify the goods or services being rendered to Howard County Utilities.

Information Provided:

See Response to OUCC DR 4-1.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

October 8, 2009

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

VIA CERTIFIED MAIL 7008 0500 0000 9208 6148

Mr. Scott Lods, Manager
Howard County Utilities, Inc.
3350 West County Road 250 North
West Lafayette, Indiana 47906

**Re: Inspection Summary/Referral to the Office of
Water Quality Enforcement Section
Green Acres Golf Course and Subdivision
Wastewater Treatment Facility
NPDES Permit No. IN0038768
Kokomo, Howard County**

Dear Mr. Lods:

On September 15, 2009, a representative of the Indiana Department of Environmental Management, Office of Water Quality (OWQ), conducted an inspection of the Green Acres Golf Course and Subdivision Wastewater Treatment Facility, located on County Road 00 NS and County Road 900 West, Kokomo, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: Violations were observed but corrected during the inspection.
 Violations were observed.
 Violations were observed and will be referred to the Enforcement Section.

The following violations and concerns were identified:

1. Part II. B. 2 of the permit states, in part, that pursuant to 327 IAC 5-2-8(11) bypasses are prohibited, and the Commissioner may take enforcement action against a permittee, unless:
 1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage, as defined;
 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 notices as required by Part II. B. 2.d of the permit; or
 4. The condition under Part II. B. 2.f is met

A records review during the inspection revealed your facility reported bypass events as follows:

- A. December 2008 – Five (5) events
- B. January 2009 – One (1) event

- C. February 2009 – Ten (10) events
- D. March 2009 – Six (6) events
- E. April 2009 – Eighteen (18) events
- F. May 2009 – Twelve (12) events
- G. June 2009 – One (1) event

2. Part I. A. 1 Table 1 of the permit sets forth the effluent limitations applicable to the discharge from Outfall 001.

A review of the July 2008 through July 2009 Discharge Monitoring Reports (DMR) and the Monthly Report of Operations (MRO) during the inspection revealed your facility has reported final effluent violations as follows:

	Number of Total Suspended Solids (TSS) Violations	Number of Biological Oxygen Demand (CBOD) Violations	Number of pH Violations
February	Four (4)	Two (2)	Two (2)
March	Two (2)	One (1)	
April	Three (3)		One (1)
May	Two (2)		

All violations noted in items 1 and 2 noted above are directly related to excessive inflow and infiltration (I/I) into the collection system.

The Compliance Schedules portion of the NPDES Facility Notice of Inspection was rated as marginal. A records review prior to the inspection indicated that Howard County Utility submitted, and IDEM approved, a Compliance Plan in conjunction with the existing Agreed Order. The Compliance Plan, step C, states "Construct the new wastewater treatment plant including, but not limited to infrastructure improvements, lift stations etc., necessary to transport sewage to the new treatment plant." The Compliance Plan then states the "Date due is 365 days after the Effective Date of the Construction Permit". IDEM issued the construction permit for the new wastewater treatment plant on March 2, 2009. A visual inspection of the area to house the new plant revealed the only progress completed is rough excavation and some survey work. Furthermore, no collections system or lift station improvements have been completed.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your existing Agreed Order, Case No. 2007-17191-W. Please direct any questions to Lynn Raisor at (317) 233-2488 or by cell phone at (317) 691-0099 or by email to Lraisor@idem.IN.gov.

Sincerely,


Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Cc: Mark Stanifer, OWQ Enforcement Section



NPDES FACILITY NOTICE OF INSPECTION

State Form 47989 (R6 / 5-06)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Facility and Inspection Information

NPDES Permit #: IN0038768	Facility Type Code: <input type="checkbox"/> 1 = Municipality <input checked="" type="checkbox"/> 2 = Industry/Semi-Public <input type="checkbox"/> Major <input type="checkbox"/> 3 = Agricultural <input type="checkbox"/> 4 = State/Federal <input checked="" type="checkbox"/> Minor	Classification Per Permit: I
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This is to notify you that on **9-15-09** (month, day, year) an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

TYPE OF INSPECTION (may include more than one):

<input checked="" type="checkbox"/> Compliance Evaluation Inspection (C)	<input type="checkbox"/> Complaint (J)
<input type="checkbox"/> Reconnaissance Inspection (R)	<input type="checkbox"/> Multi-media Screening Evaluation (M)
<input type="checkbox"/> Industrial User Inspection (I)	<input type="checkbox"/> Combined Sewer Overflow Inspection (Y)
<input type="checkbox"/> Sanitary Sewer Overflow Inspection (V)	<input type="checkbox"/> Compliance Sampling Inspection (S)
	<input type="checkbox"/> Other

Name and Location of Facility Inspected: (number, street, city, zip code) Green Acres Golf Course & Subdivision CR 60 NW and CR 900W Kokomo	Receiving Waters/POTW: Wildcat Creek	Permit Expiration Date: 11-30-11
County: Howard		

Name(s) of On-Site Representatives: Doug Whitman	Title(s): Certified Operator	Phone: 317 331-0511
		Fax: () (cell)

Certified Operator: Doug Whitman	Number: 13948	Class: IV	<input type="checkbox"/> Full Time <input checked="" type="checkbox"/> Part Time
	Renewal Effective Date: 7-11-09	Expiration Date: 6-30-11	Hours per Week: 10-15

Name and Address of Responsible Official: (number, street, city, zip code) Mr. Scott Koda 3350 W. CR 250 N West Lafayette, In. 47906	Title: Manager, Howard County Utilities	Phone: ()
		Fax: ()
	Contacted: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Facility Design Flow: .05425

Areas Evaluated During Inspection

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

<input checked="" type="checkbox"/> Receiving Waters Appearance	<input checked="" type="checkbox"/> Facility/Site	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Compliance Schedules (3)
<input checked="" type="checkbox"/> Effluent Appearance	<input checked="" type="checkbox"/> Operation	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Maintenance (12)	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Effluent Limits Violations
<input checked="" type="checkbox"/> CSO/SSO (Sewer Overflow) (1)	<input checked="" type="checkbox"/> Sludge Disposal	<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Other:

Preliminary Inspection/Screening Findings*

*These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

SINGLE MEDIA INSPECTION:

No violations were discovered with respect to the particular items observed during the inspection. (5)

Violations were discovered but corrected during the inspection. (4)

Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM. (2)

Violations were discovered and may subject you to an appropriate enforcement response. (1)

Additional information/review is required to evaluate overall compliance. (6)

Potential problems were discovered or observed. (3)

Comments Regarding Unsatisfactory Ratings – Including Rule or Permit Citation(s):

1. The facility reported bypass events in Dec 2008 and Jan, Feb, March, April, May and June 2009. This is a violation of Part II.B.2 of the permit.

2. The facility has reported effluent violations in Feb, March, April and May 2009. This is a violation of Part I.A.1 of the permit.

* All bypass events and violations are a result of extreme I/I into the collection system.

MARGINAL

Additional Comments Regarding Unsatisfactory Ratings - Including Rule or Permit Citation(s):

3. The facility submitted and IDEM approved a Compliance Plan in conjunction with the Agreed Order. The CP states that the utility would "construct the new wastewater treatment plant including, but not limited to infrastructure improvements, lift station, etc. to transport sewage to the new plant". The CP states this would be done 365 days after the effective date of the Constructive Permit. IDEM issued the constructive permit in March 2009. To date, no collective system or lift station work has been completed. Furthermore, work completed for the new STP appears only to be excavation and survey. Photos taken.

Comments Regarding Marginal Ratings - Conclusions and Recommendations:

4. Effluent clear, creek ok. 5. Flow meter calibrated 7-09
6. Renewed DME/DRD July 15-July 09. 7. Reviewed pH, Cl₂, operator logs
8. Sludge hauled to Russiaville STP 9. Plant checked 5-6 days/week

Multi-Media Screening (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- Multi-media screening not conducted.
- No violations were observed during the limited multi-media screening conducted by IDEM.
- Potential violations were discovered but corrected during the inspection.
- Potential problems were discovered and may be further investigated.

Pollution Prevention

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

Compliance Assistance

In addition to the compliance assistance offered by IDEM's Individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at http://www.idem.IN.gov/ctap/.

Summary and Correction Information

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

- A written inspection summary will be provided within 45 days.
- Written report provided at the conclusion of the inspection.
- In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.
- If upon subsequent review, any changes to this report are deemed necessary, a revised report will be sent to the subject facility within 45 days.

IDEM Representative:

Printed Name: Lynn Raiser	Signature: <i>Lynn Raiser</i>	Phone Number: 233-2488	Date: 9-15-09	Time In: 9:30 Out: 1:15
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Owner/Agent Representative/Title:

Printed Name: D. Whitman	Signature: <i>D. Whitman</i>	Title: OPERATOR	Phone Number: 317 331-0511	Date: 9-15-09
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For IDEM Internal Use:

Section Chief or Regional Deputy Director: <i>W. Daily</i>	Date: 10/5/09	For: <input type="checkbox"/> Follow-up <input type="checkbox"/> NPDES Permits <input type="checkbox"/> Enforcement <input type="checkbox"/> Other
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Inspection Photographs

Facility Inspected: Green Acres Golf Course and Subdivision, Howard County
NPDES Permit No. IN0038768

Date Inspected: September 15, 2009

Photos Taken By: Lynn Raisor
IDEM, OWQ
Wastewater Inspection Section
317-233-2488
lraisor@idem.in.gov

Comments:

All photos were taken during the inspection noted above. All photos were downloaded from the camera media card and printed with no changes or alterations to any of the images. **All descriptions of the photos are the understanding of on site personnel.**



On site equipment and trailer



Additional equipment
2



Area of future STP
3



Area of future STP
4



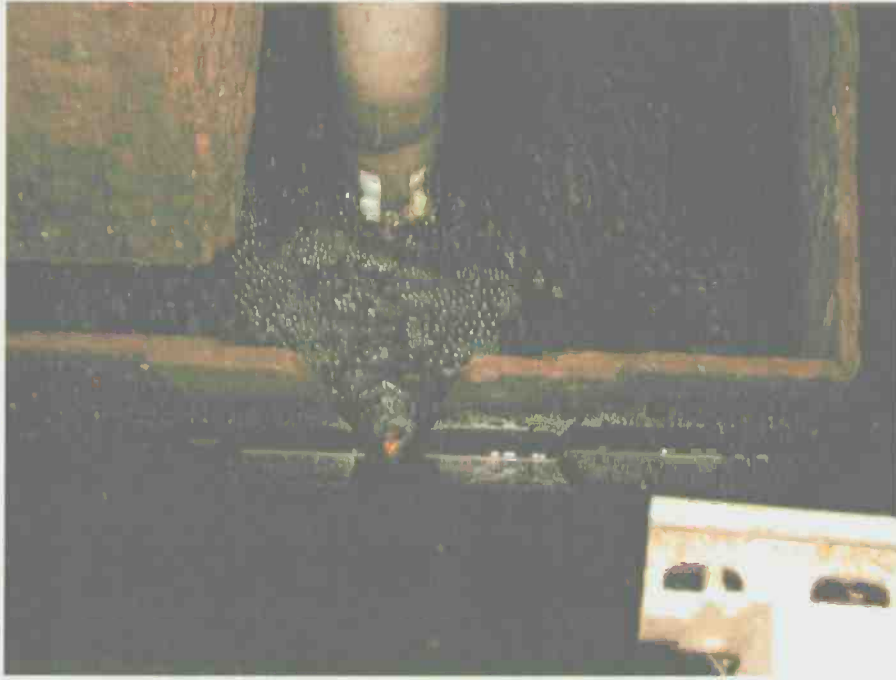
Area of future STP
5



Future access road to STP
6



Excavated soil
7



Final effluent from existing STP

IDEM	NPDES Facility	
	Compliance Evaluation Inspection Checklist for Class I Semi-Publics <small>Revised 9-6-07</small>	
NPDES Permit #: <i>IN 0038768</i>	Facility Name: <i>Green Acres Golf Course & Subdivision</i>	Month/Day/Year: <i>9-15-09</i>

All evaluations indicated on this form are based upon the Inspector's observations at the time of the inspection.

A. Receiving Waters Appearance

				1. The receiving stream is visibly:
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	a. Free of excessive deposits of settled solids.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	b. Free of excessive floating debris, oil, scum, or foam.

B. Effluent Appearance

				1. At the time of the inspection, effluent is essentially:
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	a. Free of excessive solids.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	b. Free of excessive floating debris, oil, scum, or foam.

C. Permit

<input checked="" type="checkbox"/> Yes	No	N/E	N/A	1. Expired Permit has been administratively extended.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	2. The permit has been properly transferred. <i>Permit mod. 6-08</i>
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	3. Receiving waters are accurately described in permit.

D. SSO (Sewer Overflow)

<input checked="" type="checkbox"/> Yes	No	N/E	N/A	1. Facility has met SSO reporting requirements. (see table page 3)
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E. Facility/Site

<input checked="" type="checkbox"/> Yes	No	N/E	N/A	1. Facility has standby power or equivalent provision.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	2. An adequate alarm or notification system for power or equipment failure is available.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	3. Facility grounds are maintained in a manner which allows adequate access and/or view of all units.

F. Operation

				1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit are operated in a manner consistent with the following:
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	a. All facilities and systems are operated efficiently.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	b. An adequate, qualified operating staff is provided to carry out the operation of the facility.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	2. Sufficient sludge is wasted from treatment system at proper time intervals to maintain process efficiency.

G. Maintenance

<input checked="" type="checkbox"/> Yes	No	N/E	N/A	1. All facilities and systems are adequately maintained.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	2. Lift station inspections are adequate.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	3. Lift station cleaning and maintenance procedures are adequate.
<input checked="" type="checkbox"/> Yes	No	N/E	N/A	4. Collection system maintenance is adequate. <i>Extreme I/F</i>

H. Sludge Disposal

<input checked="" type="checkbox"/> Yes	No	N/E	N/A	1. Sludges, screenings, and slurries are properly handled and disposed of.
---	----	-----	-----	--

I. Self-Monitoring Program

<input checked="" type="checkbox"/>	No	N/E	N/A	1. Samples are taken at pre-designated locations.
<input checked="" type="checkbox"/>	No	N/E	N/A	2. Samples are representative.
<input checked="" type="checkbox"/>	No	N/E	N/A	3. Facility conducts sampling and analyses on parameters and wastestreams specified in the permit.
<input checked="" type="checkbox"/>	No	N/E	N/A	4. Facility conducts sampling and analyses of types and at frequencies specified in the permit.
				5. Sample collection procedures include:
<input checked="" type="checkbox"/>	No	N/E	N/A	a. Samples are refrigerated during compositing.
<input checked="" type="checkbox"/>	No	N/E	N/A	b. Proper preservation techniques are used.
<input checked="" type="checkbox"/>	No	N/E	N/A	c. Containers and holding times conform to 40 CFR 136.3.
				6. Sampling and analysis data include:
<input checked="" type="checkbox"/>	No	N/E	N/A	a. Dates, times, and location of sampling.
<input checked="" type="checkbox"/>	No	N/E	N/A	b. Name of individual performing sampling.
<input checked="" type="checkbox"/>	No	N/E	N/A	c. Adequate on site testing data and bench sheets

} Reviewed on site intr for pH, Cl₂, 30 min

J. Flow Measurement

<input checked="" type="checkbox"/>	No	N/E	N/A	1. Flow is properly monitored as required by the permit.
<input checked="" type="checkbox"/>	No	N/E	N/A	2. Calibration records are available for review. <i>July 09</i>
<input checked="" type="checkbox"/>	No	N/E	N/A	3. Effluent flow is used in calculating effluent loadings.

K. Laboratory

<input checked="" type="checkbox"/>	No	N/E	N/A	1. Approved analytical methods used as required by permit.
<input checked="" type="checkbox"/>	No	N/E	N/A	2. Calibration and maintenance of instruments and equipment is satisfactory.
<input checked="" type="checkbox"/>	No	N/E	N/A	3. QA and QC procedures are adequate.
				4. Commercial Laboratory Used:
				Laboratory Name: <i>Russellville STP</i>
				Laboratory Address: _____
				Laboratory Contact: _____
				Laboratory Phone: _____
<input checked="" type="checkbox"/>	No	N/E	N/A	Chain-of-Custody procedures followed.

} on site testing checked

L. Records/Reports

<input checked="" type="checkbox"/>	No	N/E	N/A	1. Records and reports are maintained and available as required by permit.
<input checked="" type="checkbox"/>	No	N/E	N/A	2. Information is maintained for 3 years.
				3. DMRs and MROs are completed properly and accurately.
<input checked="" type="checkbox"/>	No	N/E	N/A	a. "No Ex" column is accurate.
<input checked="" type="checkbox"/>	No	N/E	N/A	b. Signatory requirements are met.
<input checked="" type="checkbox"/>	No	N/E	N/A	c. Reports are prepared by or under the direction of a certified operator.
<input checked="" type="checkbox"/>	No	N/E	N/A	4. Daily operations logs are available for review.

M. Compliance Schedules

<input checked="" type="checkbox"/>	No	N/E	N/A	1. Monitoring milestones in the Schedule of Compliance have been met. <i>Marginal overall rating. Concerns</i>
<input checked="" type="checkbox"/>	No	N/E	N/A	2. Reporting milestones in the Schedule of Compliance have been met. <i>about completing milestone C in the CP.</i>

N. Pretreatment

<input checked="" type="checkbox"/>	No	N/E	N/A	1. The facility operates without significant interference from industrial or commercial discharges.
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IDEM WASTEWATER PRE-INSPECTION CHECKLIST

Name and Location of Facility to be Inspected:	NPDES Permit #:	GPS Coordinates Recorded:	Date to be Inspected:	Inspector:
Name: <i>Green Acres Golf Course</i> Town/City: <i>9 Subdivision Tokomo</i> County: <i>Howard</i>	<i>IN0038768</i>	<i>unknown</i>	<i>4-15-09</i>	<i>Raiser</i>

1.	REVIEW RELEVANT PROGRAM PERMIT AND PERMIT APPLICATIONS	CHECK ONE:			
		<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
IF NO, N/A, N/E:	Provide explanation or description why:				
IF YES:	Info Source/ Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:			
	<i>Station file</i>	<i>Reviewed permit.</i>			

2.	REVIEW PRIOR INSPECTION HISTORY & REPORTS RELEVANT TO THE PROGRAM INSPECTION, PARTICULARLY ANY OUTSTANDING OR UNRESOLVED ISSUES.	CHECK ONE:			
		<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
IF NO, N/A, N/E:	Explanation:				
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:			
	<i>Station file</i>	<i>Reviewed reports.</i>			

3.	REVIEW PRIOR COMPLIANCE AND ENFORCEMENT HISTORY RELEVANT TO PROGRAM INSPECTION, PARTICULARLY: WARNINGS AND MINOR VIOLATIONS, FORMAL ACTIONS (OE &/OR EPA)	CHECK ONE:			
		<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
IF NO, N/A, N/E:	Explanation:				
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:			
	<i>Station file</i>	<i>Reviewed AO</i>			

4.	REVIEW FACILITY RESPONSES TO ALL OF THE ABOVE.	CHECK ONE:			
		<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
IF NO, N/A, N/E:	Explanation:				
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:			
	<i>Station file</i>	<i>Reviewed CP</i>			

5.	REVIEW FACILITY RECORDS, REPORTS, SELF-MONITORING DATA CURRENTLY AVAILABLE.	CHECK ONE:			
IF NO, N/A, N/E:	Explanation: <i>Data on site.</i>	YES	<input checked="" type="radio"/> NO	N/A	N/E
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:			

6.	REVIEW MAPS SHOWING FACILITY LAYOUT AND WASTE MANAGEMENT/DISCHARGE SITES.	CHECK ONE:			
IF NO, N/A, N/E:	Explanation:	<input checked="" type="radio"/> YES	NO	N/A	N/E
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection: <i>Inspector familiar with layout.</i>			

7.	REVIEW RECORDS OF CITIZEN'S COMPLAINTS.	CHECK ONE:			
IF NO, N/A, N/E:	Explanation: <i>None Known</i>	YES	<input checked="" type="radio"/> NO	N/A	N/E
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:			

8.	REVIEW ANY PROCESS INFORMATION.	CHECK ONE:			
IF NO, N/A, N/E:	Explanation:	<input checked="" type="radio"/> YES	NO	N/A	N/E
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection: <i>Inspector familiar with process.</i>			

9.	REVIEW AND DETERMINE APPLICABLE REQUIREMENTS.	CHECK ONE:			
IF NO, N/A, N/E:	Explanation:	<input checked="" type="radio"/> YES	NO	N/A	N/E
IF YES:	Info Source/Location/Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection: <i>NPDES</i>			

ADDITIONAL COMMENTS:



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

June 18, 2010

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

VIA CERTIFIED MAIL 91 7190 0005 2710 0005 9734

Mr. Scott Lods, Manager
Howard County Utilities, Inc.
3350 W 250 N
West Lafayette, Indiana 47906

**Re: Inspection Summary/ Referral to the Office of
Water Quality Enforcement Section
Green Acres Golf Course & Subdivision
Wastewater Treatment Facility
NPDES Permit No. IN0038768
Kokomo, Howard County**

Dear Mr. Lods:

On May 26, 2010, a representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an inspection of the Green Acres Golf Course & Subdivision Wastewater Treatment Facility, located in Kokomo, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Reconnaissance Inspection (R)

Results of Inspection: Violations were observed but corrected during the inspection.
 Violations were observed.
 Violations were observed and will be referred to the Enforcement Section.

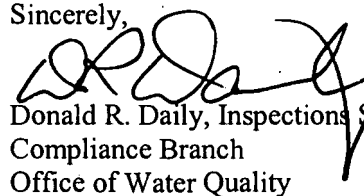
The following violations and concerns were identified:

1. Effluent appearance was rated as marginal due to slight turbidity.
2. Facility must apply for a permit modification before discharge begins at the new WWTP that is currently under construction.
3. Sanitary sewer overflows were reported as follows: January 2010 - 3 days, March 2010 - 9 days. The CSO/SSO evaluation generated an unsatisfactory rating due to the facility experiencing a sanitary sewer overflow/bypass and is in violation of Part II. B. 2 of the permit states, in part, that pursuant to 327 IAC 5-2-8(11) bypasses are prohibited, and the Commissioner may take enforcement action against the permittee for bypass, unless:
 1. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage, as defined;
 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 preventative maintenance; and

3. The permittee submitted notices as required by Part II. B. 2.d of the permit; or
4. The condition under Part II. B. 2.f is met
4. Maintenance was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which states, in part, that the facility shall have an ongoing preventative maintenance program for the sanitary sewer system.
5. Inspector visited construction site of new WWTP. It appears to be far from finished. The deadline for completion of construction has been extended to June 13, 2010. If further extension is necessary, due to force majeure, it will be done on a month to month written request basis through IDEM's Enforcement Section.
6. The Effluent Limits Violations evaluation generated an unsatisfactory rating. A review of the January 2010 to April 2010 Discharge Monitoring Reports (DMR) and the Monthly Report of Operations (MRO) during the inspection revealed your facility reported excessive final effluent violations. This is a violation of Part I. A. 1 Table 1 of the permit which sets forth the effluent limitations applicable to the discharge from Outfall 001. Effluent limit violations were reported as follows for loading: January - 2 TSS; February - 1 CBOD; March - 2 TSS, 2 CBOD. Part I. A. 1. [2] also sets forth a minimum removal efficiency for CBOD and TSS which must be attained. This 85 % removal was not achieved for either parameter in any of the months of January, February, or March; in April the removal efficiency was not achieved for TSS.

Enclosed is a copy of the Notice of Inspection for your records. This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your existing Agreed Order, Case No. 2007-17191-W. Please direct any questions to Becky Ruark at 317-691-1909 or by email to bruark@idem.IN.gov.

Sincerely,



Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

Cc: Mark Stanifer, OWQ Enforcement Section



Wastewater Facility Notice of Inspection

State Form 54290 (5-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OUCC Attachment JTP-5
Cause No. 45360
Page 17 of 124

FACILITY AND INSPECTION INFORMATION

NPDES Permit number IN0038768	Facility Type Code: 2 = Semi-Public	Minor	Classification Per Permit: I
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This is to notify you that on May 26, 2010 an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

TYPE OF INSPECTION: **Reconnaissance Inspection (R)**

Name and Location of Facility Inspected: Green Acres Golf Course & Subdivision 1300 Greenacres Dr Kokomo, Indiana 46901	County: Howard	Receiving Waters/POTW: Wildcat Creek	Permit Expiration Date: 11/30/2011
			Facility Design Flow: 0.05425 MGD

On Site Representative(s)				
Name	Title	Facility phone	Cell phone	Email
Doug Whitman	Certified Operator		317-331-0511	

Certified Operator: Doug Whitman	Number: 13968	Class: IV	Renewal Effective Date: 7/20/2009	Expiration Date: 6/30/2011	Hours/Week:
--	-------------------------	---------------------	---	--------------------------------------	-------------

Responsible Official: Mr. Scott Lods 3350 W 250 N West Lafayette, Indiana 47906	Title: Manager, Howard County Utilities, Inc. Kokomo
	Email:
	Telephone:
	Fax:
	Contacted? No

AREAS EVALUATED DURING INSPECTION

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

S Receiving Waters Appearance	N Facility/Site	N Self-Monitoring Program	S Compliance Schedules
M Effluent Appearance	S Operation	S Flow Measurement	NA Pretreatment
S Permit	U Maintenance	S Laboratory	U Effluent Limits Violations
U CSO/SSO (Sewer Overflow)	N Sludge Disposal	S Records/Reports	N Other:

PRELIMINARY INSPECTION/SCREENING FINDINGS

*These findings are considered preliminary and identify specific compliance issues discovered during the above noted inspection that the designated agent of IDEM believes may be a violation of statute(s), rule(s), or permit(s) issued by IDEM.

SINGLE MEDIA INSPECTION:

- No violations were discovered with respect to the particular items observed during the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- 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)
- Additional information/review is required to evaluate overall compliance. (6)
- Potential problems were discovered or observed. (3)

Comments Regarding Ratings:

The Following Facility Records Were Reviewed:
Discharge Monitoring Reports
Monthly Report of Operations

The Following Laboratory Records Were Reviewed:
TSS Bench Sheet
CBOD Bench Sheet
pH Bench Sheet
Laboratory instrument calibration

Wildcat Creek was high and muddy. No problems observed as a result of the WWTP discharge.

Effluent appearance was rated as marginal due to slight turbidity.

Facility must apply for a permit modification before discharge begins at the new WWTP that is currently under construction.

Sanitary sewer overflows were reported as follows: January 2010 - 3 days, March 2010 - 9 days.

The CSO/SSO evaluation generated an unsatisfactory rating due to the facility experiencing several sanitary sewer overflow/bypasses and is in violation of Part II. B. 2 of the permit which states, in part, that pursuant to 327 IAC 5-2-8(11) bypasses are prohibited, and the Commissioner may take enforcement action against the permittee for bypass, unless:

1. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage, as defined;
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 preventative maintenance; and
3. The permittee submitted notices as required by Part II. B. 2.d of the permit; or
4. The condition under Part II. B. 2.f is met

The facility is checked at least five days per week.

Maintenance activities, such as cleaning and repairs, are documented on operator daily logs.

Maintenance was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which states, in part, that the facility shall have an ongoing preventative maintenance program for the sanitary sewer system.

The final flow meter last calibrated in July 2009.

The bench sheets reviewed are accurate and complete.

Records reviewed were on site and available. All appear complete and accurate.

Inspector visited construction site of new WWTP. It appears to be far from finished. The deadline for completion of construction has been extended to June 13, 2010. If further extension is necessary, due to force majeure, it will be done on a month to month written request basis through IDEM's Enforcement Section.

The Effluent Limits Violations' evaluation generated an unsatisfactory rating. A review of the January 2010 to April 2010 Discharge Monitoring Reports (DMR) and the Monthly Report of Operations (MRO) during the inspection revealed your facility reported excessive final effluent violations. This is a violation of Part I. A. 1 Table 1 of the permit which sets forth the effluent limitations applicable to the discharge from Outfall 001. Effluent limit violations were reported as follows for loading: January - 2 TSS; February - 1 CBOD; March - 2 TSS, 2 CBOD. Part I. A. 1. [2] also sets forth a minimum removal efficiency for CBOD and TSS which must be attained. This 85 % removal was not achieved for either parameter in any of the months of January, February, or March; in April the removal efficiency was not achieved for TSS.

MULTI-MEDIA SCREENING (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

Multi-media screening not conducted.

POLLUTION PREVENTION

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental waste, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at 317 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? No

COMPLIANCE ASSISTANCE

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call 317 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/oppta/ctap/.

SUMMARY AND CORRECTION INFORMATION

Case No. 0300
Page 10 of 12

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM REPRESENTATIVE:

Inspector Name Becky Ruark	Signature <i>Becky Ruark</i>	Telephone number 317-691-1909	Date May 26, 2010	
Inspector Email bruark@idem.IN.gov			Time In 10:00 AM	Time Out 12:15 PM

FACILITY REPRESENTATIVE:

Printed name	Signature	Title	Telephone number	Date
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FOR IDEM INTERNAL USE:

IDEM Manager Review <i>[Signature]</i>	Date 6-11-10	For: <input type="checkbox"/> Follow up <input type="checkbox"/> Enforcement <input type="checkbox"/> NPDES permits <input type="checkbox"/> Other
---	-----------------	--

IDEM WASTEWATER PRE-INSPECTION CHECKLIST

Name and Location of Facility to be Inspected:	NPDES Permit #:	GPS Coordinates Recorded:	Date to be Inspected:	Inspector:
Name: Green Acres Golf Course & Subdivision Town/City: Kokomo County: Howard	IN0038768	No	5/26/2010	Becky Ruark

1. PRE-INSPECTION FILE REVIEW WAS CONDUCTED.	Yes
---	-----

2. REVIEW RELEVANT PROGRAM PERMIT AND PERMIT APPLICATIONS.	Yes
---	-----

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	Reviewed current permit.

3. REVIEW PRIOR INSPECTION HISTORY & REPORTS RELEVANT TO THE PROGRAM INSPECTION, PARTICULARLY ANY OUTSTANDING OR UNRESOLVED ISSUES.	Yes
--	-----

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	Reviewed previous inspection reports.

4. REVIEW PRIOR COMPLIANCE AND ENFORCEMENT HISTORY RELEVANT TO PROGRAM INSPECTION, PARTICULARLY: WARNINGS AND MINOR VIOLATIONS, FORMAL ACTIONS (OE &/OR EPA)	Yes
---	-----

No recent activity.

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	Reviewed Agreed Order

5. REVIEW FACILITY RESPONSES TO ALL OF THE ABOVE.	Yes
--	-----

No recent correspondence

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	Reviewed response to previous Violation Letter(s).

6. REVIEW FACILITY RECORDS, REPORTS, SELF-MONITORING DATA CURRENTLY AVAILABLE.	No
---	----

Will review data on site.

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
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Inspector file	5/26/2010	
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7. REVIEW MAPS SHOWING FACILITY LAYOUT AND WASTE MANAGEMENT/DISCHARGE SITES.	No
---	-----------

No layout information in file.

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	Inspector familiar with layout.

8. REVIEW RECORDS OF CITIZEN'S COMPLAINTS.	No
---	-----------

No recent complaint information in file.

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	

9. REVIEW ANY PROCESS INFORMATION.	Yes
---	------------

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	Reviewed process information in briefing memo.

10. REVIEW AND DETERMINE APPLICABLE REQUIREMENTS.	Yes
--	------------

Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2010	NPDES



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

December 3, 2010

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

VIA CERTIFIED MAIL 91 7190 0005 2710 0010 0306

Mr. Scott Lods, President
Howard County Utilities
3350 West 250 North
West Lafayette, Indiana 57906

Re: **Inspection Summary/ Referral to the Office of Water
Quality Enforcement Section**
Green Acres Golf Course & Subdivision Wastewater Treatment
Facility
NPDES Permit No. IN0038768
Kokomo, Howard County

Dear Mr. Lods:

On October 22, 2010, a representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an inspection of the Green Acres Golf Course & Subdivision Wastewater Treatment Facility, located in Kokomo, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

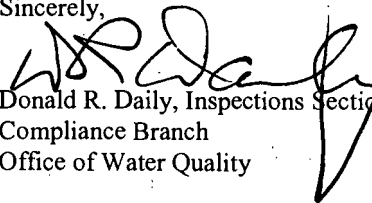
Type of Inspection:	Compliance Evaluation Inspection
Results of Inspection:	<input type="checkbox"/> Violations were observed but corrected during the inspection. <input type="checkbox"/> Violations were observed. <input checked="" type="checkbox"/> Violations were observed and will be referred to the Enforcement Section.

The following specific items were noted:

- Sanitary sewer overflows were reported as follows: June 2010 - 10 days and May 2010 - 3 days. The CSO/SSO evaluation generated an unsatisfactory rating due to the facility experiencing sanitary sewer overflows.
- Maintenance was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your existing Agreed Order, Case No. 2007-17191-W. Please direct any questions to Lynn Raisor at 317-691-0099 or by email to Lraisor@idem.IN.gov.

Sincerely,


Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

Cc: Mark Stanifer, OWQ Enforcement Section



Wastewater Facility Notice of Inspection

State Form 54290 (5-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FACILITY AND INSPECTION INFORMATION

NPDES Permit Number IN0038768	Facility Type Code Semi-Public	Minor	Classification Per Permit I
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This is to notify you that on October 22, 2010, an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

Type Of Inspection: **Compliance Evaluation Inspection**

Name and Location of Facility Inspected Green Acres Golf Course & Subdivision WWTF 1300 Greenacres Dr Kokomo, Indiana 46901	County Howard	Receiving Waters/POTW Wildcat Creek	Permit Expiration Date 11/3/2011
			Facility Design Flow .05425

On Site Representative(s)

Name	Title	Facility phone	Cell phone	Email
Doug Whitman	Certified Operator		317-331-0511	
Scott Lods	Manager, Howard County Utilities, Inc.			

Certified Operator Doug Whitman	Number 13968	Class IV	Renewal Effective Date 7/20/2009	Expiration Date 6/30/2011	Hours/Week 5-7
---	------------------------	--------------------	--	-------------------------------------	--------------------------

Responsible Official Mr. Scott Lods Howard County Utilities 3350 West 250 North West Lafayette, Indiana 57906	Title President	Email	Telephone 7650463-3856	Contacted? Yes
			Fax	

AREAS EVALUATED DURING INSPECTION

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

S Receiving Waters	S Facility/Site	S Self-Monitoring	S Compliance Schedules
S Effluent Appearance	M Operation	S Flow Measurement	NA Pretreatment
S Permit	U Maintenance	S Laboratory	M Effluent Limits Violations
U CSO/SSO (Sewer Overflow)	S Sludge	S Records/Reports	N Other:

PRELIMINARY INSPECTION/SCREENING FINDINGS

*These findings are considered preliminary and identify specific compliance issues discovered during the above noted inspection that the designated agent of IDEM believes may be a violation of statute(s), rule(s), or permit(s) issued by IDEM.

SINGLE MEDIA INSPECTION:

- No violations were discovered with respect to the particular items observed during the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- 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)
- Additional information/review is required to evaluate overall compliance. (6)
- Potential problems were discovered or observed. (3)

Comments Regarding Ratings:

The Following Facility Records Were Reviewed:
Discharge Monitoring Reports
Monthly Report of Operations

The Following Laboratory Records Were Reviewed:
TSS Bench Sheet E. coli bench sheet
CBOD Bench Sheet Ammonia Bench Sheet

DMRs and MROs reviewed: from April 2010 to August 2010

Sanitary sewer overflows were reported as follows: June 2010 - 10 days and May 2010 - 3 days. The CSO/SSO evaluation generated an unsatisfactory rating due to the facility experiencing sanitary sewer overflows.

Maintenance was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration in the collection system. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

Operation was rated as marginal due to slight ashing on the clarifier surface.

The Effluent Limits Violations evaluation generated a marginal rating. The records review conducted during the inspection indicated effluent violations. Violations were reported as follows: June 2010 – pH – 5, Chlorine – 10. These violations were attributed to flooding at the WWTP and samples were unable to be obtained. DMRs and MROs reviewed: from April 2010 to August 2010.

Receiving Waters appearance was visibly free of solids, color and sheen. Effluent was clean and clear at the time of the inspection. Sludge hauled to Russiaville STP.

The Self Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. The facility is checked daily. Final flow monitoring is accurate and representative. Calibration is scheduled for November 2010.

Inspector visited the construction site of the new WWTP. According to Mr. Lods, construction is expected to be completed to begin treating influent sewage by the end of November 2010. The deadline for completion has been extended on a month to month basis by IDEM's Enforcement Section.

MULTI-MEDIA SCREENING (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):
Multi-media screening not conducted.

POLLUTION PREVENTION

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental waste, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at 317 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? No

COMPLIANCE ASSISTANCE

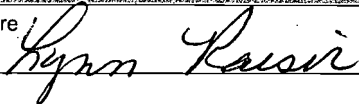
In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call 317 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/oppta/ctap/.

SUMMARY AND CORRECTION INFORMATION

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

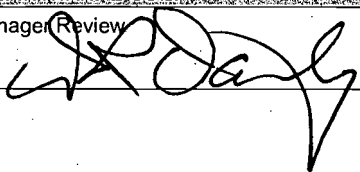
IDEM REPRESENTATIVE:

Inspector Name Lynn Raisor	Signature 	Telephone Number 317-691-0099	Date October 22, 2010
Inspector Email Lraisor@idem.IN.gov		Time In 9:10 AM	Time Out 2:15 PM

FACILITY REPRESENTATIVE:

Printed name	Signature	Title	Telephone Number	Date
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FOR IDEM INTERNAL USE:

IDEM Manager Review 	Date 11-24-10	For: <input type="checkbox"/> Follow up <input type="checkbox"/> NPDES permits <input type="checkbox"/> Enforcement <input type="checkbox"/> Other
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Inspection Photographs

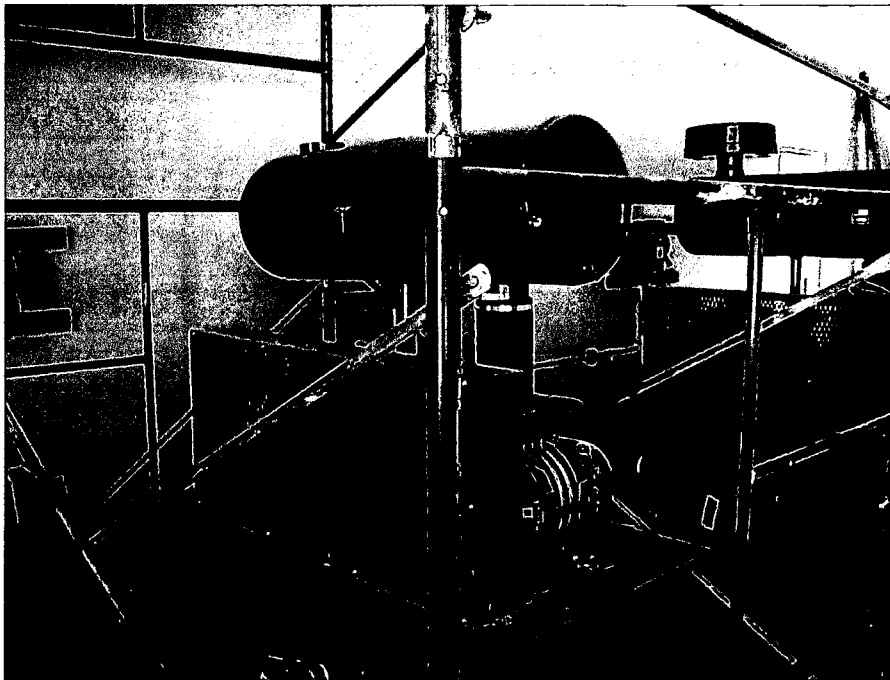
Facility Inspected: Green Acres Golf Course, Howard County
NPDES Permit No. IN0038768

Date Inspected: October 22, 2010

Photos Taken By: Lynn Raisor
IDEM, OWQ
Wastewater Inspection Section
317-233-2488
lraisor@idem.in.gov

Comments:

All photos were taken during the inspection noted above. All photos were downloaded from the camera media card and printed with no changes or alterations to any of the images.



1 of 4 new blowers
01



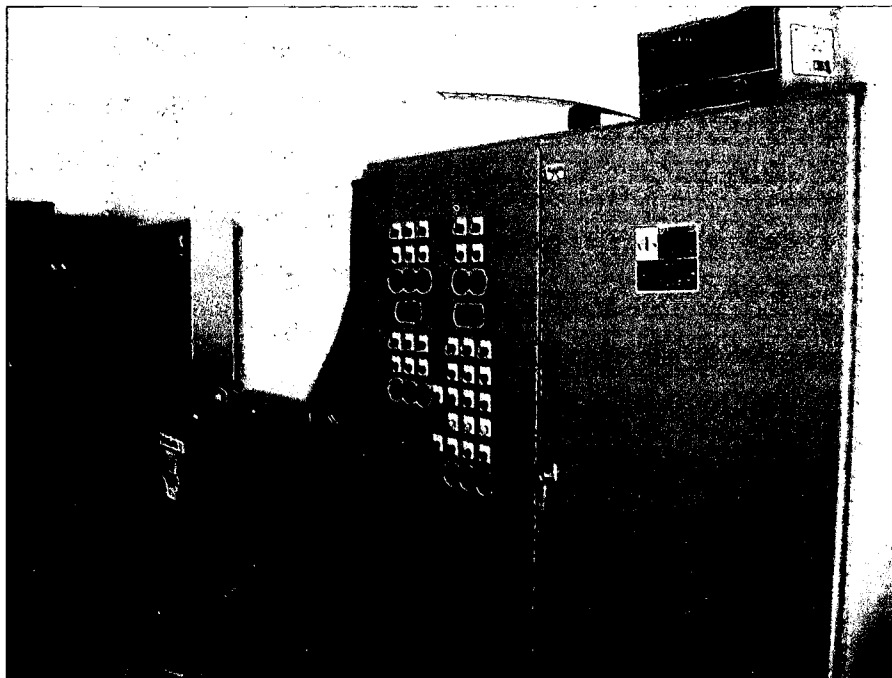
New plant – EQ to the right, followed by digester, aeration and clarifiers
02



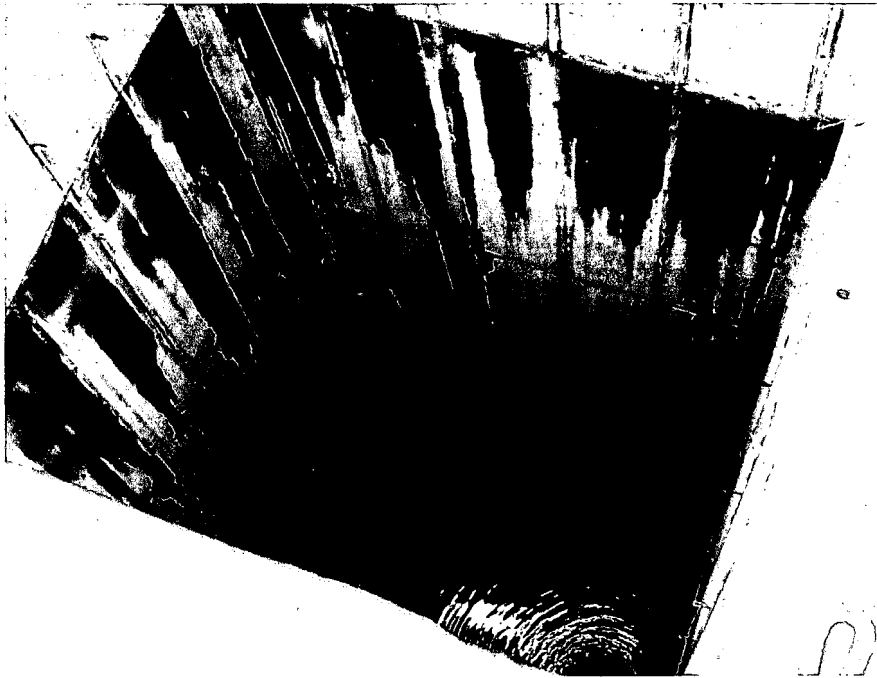
New lab and office building
03



New Generator
04



Control panels
05



New lift station. This is 40 foot deep and the only station on the system. All waste gravity flows to this point.

06



Aeration tank - 24 foot deep

07

NPDES Facility Compliance Evaluation Checklist

IN0038768	Green Acres Golf Course & Subdivision WWTF	10/22/2010
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All evaluations indicated on this form are based upon the Inspector's observations at the time of the inspection.

Areas Evaluated

A. Receiving Waters Appearance

Yes	1. The receiving stream is visibly free of excessive deposits of settled solids.
Yes	2. The receiving stream is visibly free of excess floating debris, oil, scum, or foam.

B. Effluent Appearance

Yes	1. Treated effluent is essentially free of excessive deposits of settled solids, floating debris, oil, scum or foam.

C. Permit

N/A	1. Was a permit renewal application submitted to IDEM at least 180 days prior to the expiration date?
Yes	2. The facility description, including the receiving waters, is complete and accurate
N/A	3. The permit has been properly transferred

D. CSO/SSO (Sewer Overflow)

Yes	1. CSOs are adequately monitored and maintained.
No	2. The facility has had zero SSO/overflow events in the past six months.

E. Facility/Site

N/E	1. The facility has standby power or equivalent provision.
Yes	2. An adequate alarm or notification system for power or equipment failure is available for the treatment facility and for lift stations.
Yes	3. Safe and adequate access is provided for inspection of all treatment units, lift stations, and outfalls.
Yes	3. The facility housekeeping is adequate.

F. Operation

No	1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit are operated efficiently.
Yes	2. An adequate, qualified operating staff is provided to carry out the operation of the facility.
Yes	3. Sufficient solids are wasted from the treatment system, at proper intervals, to maintain process efficiency.
Yes	4. Wasting of solids is based on pre-determined values and valid process control testing.

G. Maintenance

Yes	1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
Yes	2. Lift station inspections, cleaning and maintenance procedures are adequate.
No	3. Collection system maintenance is adequate.

H. Sludge Disposal

Yes	1. Sludges, screenings, and slurries are disposed of properly to maintain overall efficiency of the facility.
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I. Self-Monitoring Program

Yes	1. The sampling protocol and procedure; including locations, type and frequency, is accurate and adequate.
Yes	2. Sampling and analysis data and documentation is accurate.
N/A	3. NPDES Permit Whole Effluent Toxicity (WET) testing requirements are being met.

J. Flow Measurement

Yes	1. Flow is properly monitored as required by the permit.
Yes	2. Flow charts and calibration records are available for review.
Yes	3. Effluent flow is used in calculating effluent loadings.

K. Laboratory

1. The following laboratory records were reviewed:	
TSS Bench Sheet CBOD Bench Sheet Ammonia Bench Sheet E. coli bench sheet	
Yes	2. All laboratory practices and protocol reviewed, including bench sheets were adequate.

L. Records/Reports

1. The following facility records were reviewed:	
Discharge Monitoring Reports Monthly Report of Operations Bypass/Overflow Report	
Yes	2. All records reviewed were accurate and available.

M. Compliance Schedules

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

N. Pretreatment

N/A	1. The pretreatment records, including inventory, monitoring, inspection and enforcement, are complete and accurate.
N/A	2. For both Delegated and Non-Delegated, the program is regulated as required.
N/A	3. The SUO/ERG has been developed or updated as required for NON-Delegated programs.

O. Effluent Limits Violations

Yes	1. Reviewed DMRs and MROs during the inspection.
From: April 2010	To: August 2010
Yes	2. Were effluent violations reported?

IDEM WASTEWATER PRE-INSPECTION CHECKLIST

Name and Location of Facility to be Inspected:	NPDES Permit #:	GPS Coordinates Recorded:	Date to be Inspected:	Inspector:
Name: Green Acres Golf Course & Subdivision WWTF Town/City: Kokomo County: Howard	IN0038768	No	10/22/2010	Lynn Raisor

1. PRE-INSPECTION FILE REVIEW WAS CONDUCTED.	Yes
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2. REVIEW RELEVANT PROGRAM PERMIT AND PERMIT APPLICATIONS.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file		Reviewed current permit.	

3. REVIEW PRIOR INSPECTION HISTORY & REPORTS RELEVANT TO THE PROGRAM INSPECTION, PARTICULARLY ANY OUTSTANDING OR UNRESOLVED ISSUES.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file		Reviewed previous inspection reports.	

4. REVIEW PRIOR COMPLIANCE AND ENFORCEMENT HISTORY RELEVANT TO PROGRAM INSPECTION, PARTICULARLY: WARNINGS AND MINOR VIOLATIONS, FORMAL ACTIONS (OE &/OR EPA)			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file		Reviewed Agreed Order	

5. REVIEW FACILITY RESPONSES TO ALL OF THE ABOVE.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file		Reviewed response to previous Violation Letter(s).	

6. REVIEW FACILITY RECORDS, REPORTS, SELF-MONITORING DATA CURRENTLY AVAILABLE.			No
Will review data on site.			
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file			

7. REVIEW MAPS SHOWING FACILITY LAYOUT AND WASTE MANAGEMENT/DISCHARGE SITES.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file		Inspector familiar with layout.	

8. REVIEW RECORDS OF CITIZEN'S COMPLAINTS.			No
None known.			
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file			

9. REVIEW ANY PROCESS INFORMATION.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file		Inspector familiar with facility process.	

10. REVIEW AND DETERMINE APPLICABLE REQUIREMENTS.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file		NPDES	



We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

June 29, 2011

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

VIA CERTIFIED MAIL 91 7190 0005 2710 0014 8223

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Re: **Inspection Summary/ Referral to the Office of Water
Quality Enforcement Section**
Howard County Utilities, Inc. Wastewater Treatment
Facility
NPDES Permit No. IN0063754
Russiaville, Howard County

Dear Mr. Lods:

On May 26, 2011, a representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an inspection of the Howard County Utilities, Inc. Wastewater Treatment Facility, located in Russiaville, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Reconnaissance Inspection

Results of Inspection: Violations were observed but corrected during the inspection.
 Violations were observed.
 Violations were observed and will be referred to the Enforcement Section.

The following specific items were noted:

The overall housekeeping and access to all units of treatment is unsatisfactory. At the time of the inspection, there was no gravel, excessive mud, no stairs to the treatment tanks (a step ladder was available). This is a violation of Part II. B. 1 of the permit.

There was no access to the outfall. Regardless of the mud/no grading, access has not been completed. This is a violation of Part II. A. 16 of the permit.

Operation was rated as marginal due to inadequate start up procedures. The facility seeded the new plant with the return activated sludge from the old Green Acres plant and did not haul in seed sludge. The mixed liquor at the inspection was very weak and unable to provide sufficient treatment to the influent flows. The clarifiers had virtually no settling, resulting in a turbid effluent.

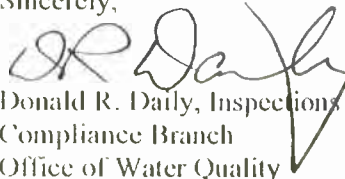
Maintenance was rated as unsatisfactory due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system which continues to hydraulically overload the wastewater treatment plant. At the time of the inspection, the effluent flow was approximately .40 mgd. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the

operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

The Compliance Schedules evaluation generated an unsatisfactory rating. On March 11, 2010 IDEM extended the deadline for completion of construction to June 13, 2010. The plant started treating waste at the new plant on May 17, 2011.

The NPDES Facility Notice of Inspection has been revised to include the Compliance Schedule violation, corrected operational start up procedures and properly reflect the inspection times. A copy of the NPDES Facility Notice of Inspection is enclosed for your records. This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your existing Agreed Order, Case No. 2007-17191W. Please direct any questions to Lynn Raisor at 317-691-0099 or by email to Lraisor@idem.IN.gov.

Sincerely,



Donald R. Darly, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

Cc: Mark Stanifer, OWQ Enforcement Section
Mr. Scott Lods, President



Wastewater Facility Notice of Inspection

State Form 54290 (5-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OUCC Attachment JTP-5
Cause No. 45360
Page 36 of 124

Revised Report 5-31-11

FACILITY AND INSPECTION INFORMATION

NPDES Permit Number IN0063754	Facility Type Code Semi-Public	Minor	Classification Per Permit II
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This is to notify you that on May 26, 2011, an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

Type Of Inspection: Reconnaissance Inspection

Name and Location of Facility Inspected Howard County Utilities, Inc. WWTF 678 South 950 West Russiaville, Indiana	County Howard	Receiving Waters/POTW Wildcat Creek	Permit Expiration Date 3/31/2016 Facility Design Flow .20
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On Site Representative(s)

Name	Title	Facility phone	Cell phone	Email
Doug Whitman	Certified Operator	317-331-0511		
Eric Kolpfenstein	Maintenance			

Certified Operator Doug Whitman	Number 13968	Class IV	Renewal Effective Date 7/11/2009	Expiration Date 6/30/2011	Hours/Week
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Responsible Official Mr. Scott Lods Howard County Utilities, Inc. 3350 West 250 North West Lafayette, Indiana 47906	Title President Email Telephone Fax	Contacted? No
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AREAS EVALUATED DURING INSPECTION

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

N	Receiving Waters	U	Facility/Site	N	Self-Monitoring	U	Compliance Schedules
M	Effluent Appearance	M	Operation	S	Flow Measurement	NA	Pretreatment
S	Permit	U	Maintenance	N	Laboratory	N	Effluent Limits Violations
S	CSO/SSO (Sewer Overflow)	N	Sludge	N	Records/Reports	N	Other:

PRELIMINARY INSPECTION/SCREENING FINDINGS*

*These findings are considered preliminary and identify specific compliance issues discovered during the above noted inspection that the designated agent of IDEM believes may be a violation of statute(s), rule(s), or permit(s) issued by IDEM.

SINGLE MEDIA INSPECTION:

- No violations were discovered with respect to the particular items observed during the inspection. (5)
- Violations were discovered but corrected during the inspection (4)
- 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)
- Additional information/review is required to evaluate overall compliance. (6)
- Potential problems were discovered or observed. (3)

Receiving Waters not evaluated due flooding in the area.

Effluent appearance was rated as marginal due to turbidity.

The facility has a new permit, issued in March 2011. The facility description, including units of treatment and receiving stream, is accurate.

IDEM inspected manholes in the collection system that have historically overflowed during rain events. over 2" of rain in the past 24 hours and these manholes were not overflowing.

The overall housekeeping and access to all units of treatment is unsatisfactory. At the time of the inspection, there was no gravel, excessive mud, no stairs to the treatment tanks (a step ladder was available). This is a violation of Part II. B. 1 of the permit.

There was no access to the outfall. Regardless of the mud/no grading, access has not been completed. This is a violation of Part II. A. 16 of the permit.

Operation was rated as marginal due to inadequate start up procedures. The facility seeded the new plant with the return activated sludge from the old Green Acres plant and did not haul in seed sludge. The mixed liquor at the inspection was very weak and unable to provide sufficient treatment to the influent flows. The clarifiers had virtually no settling, resulting in a turbid effluent.

Maintenance was rated as unsatisfactory due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system which continues to hydraulically overload the wastewater treatment plant. At the time of the inspection, the effluent flow was approx. .40 mgd. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

The final flow meter calibrated on May 25, 2011.

The Compliance Schedules evaluation generated an unsatisfactory rating. On March 11, 2010 IDEM extended the deadline for completion of construction to June 13, 2010. The plant started treating waste at the new plant on May 17, 2011.

MULTI-MEDIA SCREENING (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

Multi-media screening not conducted.

POLLUTION PREVENTION

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental waste, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at 317 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? No

COMPLIANCE ASSISTANCE

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call 317 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/oppta/ctap/.

SUMMARY AND CORRECTION INFORMATION

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

Written report provided at the conclusion of the inspection. If upon subsequent review, any changes to this report are deemed necessary, a revised report will be sent to the responsible official within 45 days.

IDEM REPRESENTATIVE:

Inspector Name Lynn Raisor, Becky Ruark	Signature <i>Lynn Raisor Becky Ruark</i>	Telephone Number 317-691-0099	Date May 26, 2011
Inspector Email Lraisor@idem.IN.gov			Time In 9:30 AM 12:45 PM
			Time Out 12:10PM 2:30 PM

FACILITY REPRESENTATIVE:

Printed name	Signature	Title	Telephone Number	Date

FOR IDEM INTERNAL USE:

IDEM Manager Review <i>[Signature]</i>	Date 6-13-11	For. Follow up NPDES permits	Enforcement Other
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Wastewater Facility Notice of Inspection

State Form 54290 (5-10)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OUCC Attachment JTP-5
Cause No. 45360
Page 38 of 124

FACILITY AND INSPECTION INFORMATION

NPDES Permit Number IN0063754	Facility Type Code Semi-Public	Minor	Classification Per Permit II
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This is to notify you that on May 26, 2011, an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

Type Of Inspection: **Reconnaissance Inspection**

Name and Location of Facility Inspected Howard County Utilities, Inc. WWTF 678 South 950 West Russiaville, Indiana	County Howard	Receiving Waters/POTW Wildcat Creek	Permit Expiration Date 3/31/2016
			Facility Design Flow .20

On Site Representative(s)

Name	Title	Facility phone	Cell phone	Email
Doug Whitman	Certified Operator	317-331-0511		
Eric Kolpfenstein	Maintenance			

Certified Operator Doug Whitman	Number 13968	Class IV	Renewal Effective Date 7/11/2009	Expiration Date 6/30/2011	Hours/Week
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Responsible Official Mr. Scott Lods Howard County Utilities, Inc. 3350 West 250 North West Lafayette, Indiana 47906	Title President
	Email
	Telephone
	Fax
	Contacted? No

AREAS EVALUATED DURING INSPECTION

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

N Receiving Waters	U Facility/Site	N Self-Monitoring	U Compliance Schedules
M Effluent Appearance	M Operation	S Flow Measurement	NA Pretreatment
S Permit	U Maintenance	N Laboratory	N Effluent Limits Violations
S CSO/SSO (Sewer Overflow)	N Sludge	N Records/Reports	N Other:

PRELIMINARY INSPECTION/SCREENING FINDINGS*

*These findings are considered preliminary and identify specific compliance issues discovered during the above noted inspection that the designated agent of IDEM believes may be a violation of statute(s), rule(s), or permit(s) issued by IDEM.

SINGLE MEDIA INSPECTION:

- No violations were discovered with respect to the particular items observed during the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM (2)
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Receiving Waters not evaluated due flooding in the area.

Effluent appearance was rated as marginal due to turbidity.

The facility has a new permit, issued in March 2011. The facility description, including units of treatment and receiving stream, is accurate.

IDEM inspected manholes in the collection system that have historically overflowed during rain events. The area has received over 2" of rain in the past 24 hours and these manholes were not overflowing.

The overall housekeeping and access to all units of treatment is unsatisfactory. At the time of the inspection, there was no gravel, excessive mud, no stairs to the treatment tanks (a step ladder was available). This is a violation of Part II. B. 1 of the permit.

There was no access to the outfall. Regardless of the mud/no grading, access has not been completed. This is a violation of Part II. A. 16 of the permit.

Operation was rated as marginal due to inadequate start up procedures. The facility seeded the new plant with the mixed liquor from the old Green Acres plant and did not haul in seed sludge. The mixed liquor at the inspection was very weak and unable to provide sufficient treatment to the influent flows. The clarifiers had virtually no settling, resulting in a turbid effluent.

Maintenance was rated as unsatisfactory due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system which continues to hydraulically overload the wastewater treatment plant. At the time of the inspection, the effluent flow was approx. .40 mgd. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

The final flow meter calibrated on May 25, 2011.

MULTI-MEDIA SCREENING (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

Multi-media screening not conducted.

POLLUTION PREVENTION

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental waste, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at 317 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? No

COMPLIANCE ASSISTANCE

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call 317 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/uppta/ctap/.

SUMMARY AND CORRECTION INFORMATION

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

Written report provided at the conclusion of the inspection. If upon subsequent review, any changes to this report are deemed necessary, a revised report will be sent to the responsible official within 45 days.

IDEM REPRESENTATIVE:

Inspector Name Lynn Raisor, Becky Ruark	Signature <i>Lynn Raisor Becky Ruark</i>	Telephone Number 317-691-0099	Date May 26, 2011
Inspector Email Lraisor@idem.IN.gov		Time In 9:30 AM	Time Out 2:30 PM

FACILITY REPRESENTATIVE:

Printed name <i>Dave Whitman</i>	Signature <i>D Whitman</i>	Title <i>OPERATION</i>	Telephone Number 317 331-0511	Date 5-26-11
-------------------------------------	-------------------------------	---------------------------	----------------------------------	-----------------

FOR IDEM INTERNAL USE:

IDEM Manager Review	Date	For:
		<input type="checkbox"/> Follow up <input type="checkbox"/> Enforcement <input type="checkbox"/> NPDES permits <input type="checkbox"/> Other

Inspection Photographs

Facility Inspected: Howard County Utilities, Inc. Howard County
NPDES Permit No. IN0063754

Date Inspected: May 26, 2011

Photos Taken By: Lynn Raisor and Becky Ruark
IDEM, OWQ
Wastewater Inspection Section
317-233-2488
lraisor@idem.in.gov

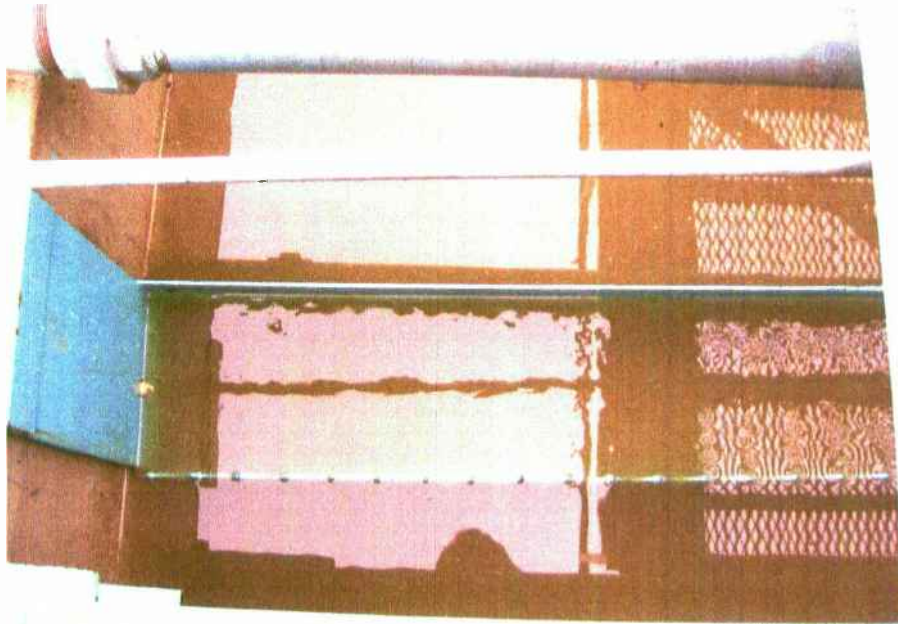
Comments:

All photos were taken during the inspection noted above. All photos were downloaded from the camera media card and printed with no changes or alterations to any of the images.



South aeration basin

01



South secondary clarifier
02



Influent wet well
03



Influent dry well
04





Digester (used for both north and south trains). See EQ/raw tank behind (2 pics)
05



UV unit. Note the weirs are submerged
06



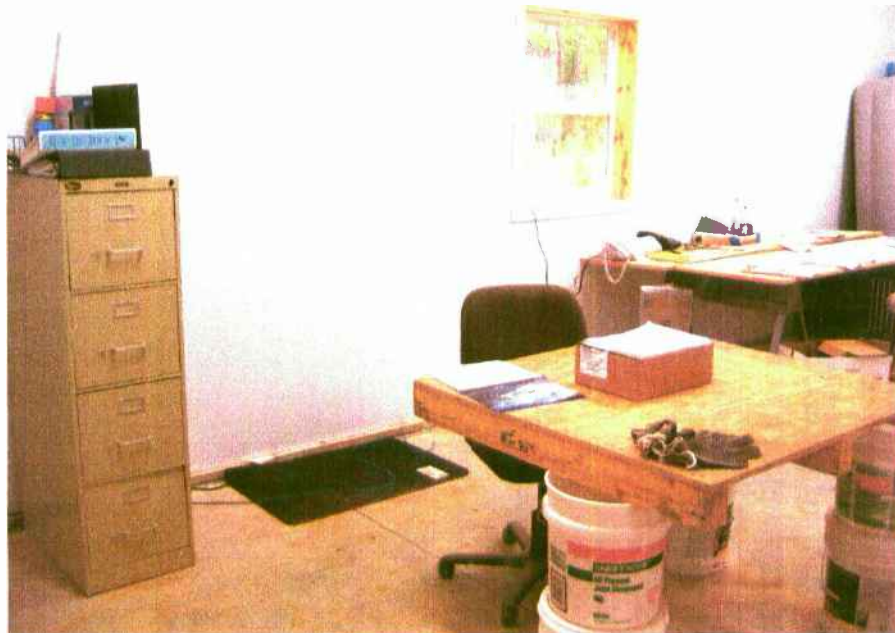
Final effluent
07



Overview 1 of the grounds
08



Overview 2 of the grounds
09



Control building/Laboratory
10



Bypass manhole. No bypassing at inspection
11



Access to the plant
12



Overview 3 of the grounds
13

IDEM WASTEWATER PRE-INSPECTION CHECKLIST

Name and Location of Facility to be Inspected:	NPDES Permit #:	GPS Coordinates Recorded:	Date to be Inspected:	Inspector:
Name: Howard County Utilities, Inc. WWTF Town/City: Russiaville County: Howard	IN0063754	No	5/26/2011	Lynn Raisor, Becky Ruark

1. PRE-INSPECTION FILE REVIEW WAS CONDUCTED.	Yes
--	-----

2. REVIEW RELEVANT PROGRAM PERMIT AND PERMIT APPLICATIONS.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	5/26/2011	Reviewed current permit.	

3. REVIEW PRIOR INSPECTION HISTORY & REPORTS RELEVANT TO THE PROGRAM INSPECTION, PARTICULARLY ANY OUTSTANDING OR UNRESOLVED ISSUES.			No
New Facility has not been inspected.			
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	5/26/2011		

4. REVIEW PRIOR COMPLIANCE AND ENFORCEMENT HISTORY RELEVANT TO PROGRAM INSPECTION, PARTICULARLY: WARNINGS AND MINOR VIOLATIONS, FORMAL ACTIONS (OE &/OR EPA)			No
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	5/26/2011	Reviewed Agreed Order	

5. REVIEW FACILITY RESPONSES TO ALL OF THE ABOVE.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	5/26/2011	Reviewed Compliance Plan correspondence. Reviewed response to previous Violation Letter(s).	

6. REVIEW FACILITY RECORDS, REPORTS, SELF-MONITORING DATA CURRENTLY AVAILABLE.			No
Will review data on site.			
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	5/26/2011		

7. REVIEW MAPS SHOWING FACILITY LAYOUT AND WASTE MANAGEMENT/DISCHARGE SITES.		Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2011	Inspector familiar with layout.

8. REVIEW RECORDS OF CITIZEN'S COMPLAINTS.		No
None known.		
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2011	

9. REVIEW ANY PROCESS INFORMATION.		Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2011	Inspector familiar with facility process.

10. REVIEW AND DETERMINE APPLICABLE REQUIREMENTS.		Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:
Inspector file	5/26/2011	NPDES



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

October 21, 2011

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

VIA CERTIFIED MAIL 91 7190 0005 2710 0017 6691

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Re: **Inspection Summary/ Referral to the Office of Water
Quality Enforcement Section**
Howard County Utilities, Inc. Wastewater Treatment
Facility
NPDES Permit No. IN0063754
Russiaville, Howard County

Dear Mr. Lods:

On September 28, 2011, a representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an inspection of the Howard County Utilities, Inc. Wastewater Treatment Facility, located in Russiaville, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Reconnaissance Inspection

Results of Inspection: Violations were observed but corrected during the inspection.
 Violations were observed.
 Violations were observed and will be referred to the Enforcement Section.

The following specific items were noted:

1. The overall housekeeping and access to all units of treatment is unsatisfactory. At the time of the inspection, there was virtually no gravel or solid surface throughout and excessive mud. The walking surface throughout the facility was considered to be a safety concern as well. The access to the main plant (aeration/clarifiers/sludge holding) was inadequate. Furthermore, access to the lift station, outfall, blower building and laboratory/office was also determined to be inadequate. This is a violation of Part II. A. 16 of the permit. Also, the following items were identified during the inspection and are in violation of Part II. B. 1 of the permit:

A. The influent pumps are causing 'surge' flows into the plant rather than pumping a more consistent influent wastestream. This is contributing to the turbidity noted in the final effluent.

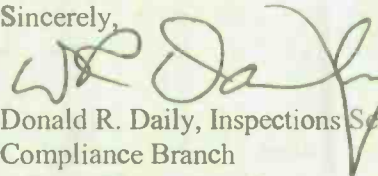
B. A review of the operator daily logs sheets indicate the control panel trips out on a regular basis. This has occurred 7 (seven) times since plant start-up in May 2011. At certain times, the result has been the influent pumps do not operate and the lift station fills. This condition has the potential to cause a significant bypass. IDEM recognizes the fact that the lift station has a sound and light alarm, but considering the location of the plant, these may not be sufficient. The plant telemetry system has not yet been completed.

- C. The facility has a total of 5 (five) blowers, but only 3 (three) were found in working condition. At the time of the inspection one blower had a broken line and another was not working.
- D. The clarifier scum line in the north clarifier is approximately 6" underwater and essentially not operating as designed. The scum lines from both clarifiers return back to the sludge holding/digester tank. This is adding unnecessary water to the sludge/digester tank.
- E. There is no potable or non-potable water at the facility. A non-potable source would allow the operator to wash down tanks and for general cleaning purposes. IDEM also has concerns that, while working with sewage, there is no ability to even wash your hands.
2. Maintenance was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which states, in part, that the facility shall have an ongoing preventative maintenance program for the sanitary sewer system. IDEM does understand that this issue was noted in the last inspection and you did not agree with the finding. However, in an email following the inspection, it was explained that it is IDEM's policy to address collection system issues in the maintenance category. A records review determined that you reported a facility capacity of treated water, in May 2011, as 123%. The following months have been extremely dry and therefore not an accurate indication that any improvements have been completed. IDEM does note the facility is new and preventative maintenance has not yet been conducted. However, please note the permit also requires a preventative maintenance program for all units of treatment, including the collection system and lift station. This program requires documentation of the maintenance conducted.
3. The facility notified IDEM of the demolition of the old wastewater plant on July 22, 2011. This notification served as the initiation on the performance plan in conjunction with the existing Agreed Order. The performance plan requires 6 (six) consecutive months, during a 12 (twelve) month period, of no bypassing or overflow events. To date, the facility has not reported any bypass or overflow events; however, no documentation of actual collection system monitoring was available for review. IDEM contacted a facility representative during the inspection and was informed, in fact, that no wet weather monitoring of the collection system is being conducted.

Marginal ratings were given to the Effluent Appearance, Operation and Effluent Limits Violations portion of the NPDES Facility Notice of Inspection. IDEM did note compliance concerns in these areas. The housekeeping and maintenance violations and operational concerns were also noted in a May 26, 2011 inspection, resulting in a June 29, 2011 Violation Letter from this office. The NPDES Facility Notice of Inspection has been revised to properly reflect the overall rating in each area of evaluation. A copy of the revised report is enclosed for your records.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your existing Agreed Order, Case No. 2007-17191W. As items #1 and #2 listed above are not addressed within your existing agreed order, a written detailed response documenting correction of this item and/or a plan for assuring future compliance must be submitted to this office within thirty (30) days of receipt of this letter. Failure to respond adequately to this letter may result in an additional referral to the OWQ Enforcement Section. Please direct your response to this letter to the attention of Lynn Raisor. Any questions regarding this matter should be directed to Lynn Raisor at 317-691-0099 or by email to Lraisor@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,



Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

Cc: Mark Stanifer, OWQ Enforcement Section



Wastewater Facility Notice of Inspection

State Form 54290 (5-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Revised Report 10-3-11

FACILITY AND INSPECTION INFORMATION			
NPDES Permit Number IN0063754	Facility Type Code Semi-Public	Minor	Classification Per Permit II

This is to notify you that on September 28, 2011, an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

Type Of Inspection: Reconnaissance Inspection

Name and Location of Facility Inspected Howard County Utilities, Inc. WWTF 678 South 950 West Russiaville, Indiana 46979	County Howard	Receiving Waters/POTW Wildcat Creek	Permit Expiration Date 3/31/2016 Facility Design Flow .20 MGD
---	------------------	--	--

On Site Representative(s)

Name	Title	Facility phone	Cell phone	Email
Doug Whitman	Certified Operator	317-331-0511		

Certified Operator Doug Whitman	Number 13968	Class IV	Renewal Effective Date 7/21/2011	Expiration Date 6/30/2013	Hours/Week 5-6
------------------------------------	-----------------	-------------	-------------------------------------	------------------------------	-------------------

Responsible Official Mr. Scott Lods Howard County Utilities, Inc. 3350 West County Road 250 North West Lafayette, Indiana 47906	Title President	
	Email	
	Telephone 765-463-3856	Contacted? No
	Fax	

AREAS EVALUATED DURING INSPECTION

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

N	Receiving Waters	U	Facility/Site	S	Self-Monitoring	U	Compliance Schedules
M	Effluent Appearance	M	Operation	S	Flow Measurement	NA	Pretreatment
S	Permit	U	Maintenance	S	Laboratory	M	Effluent Limits Violations
N	CSO/SSO (Sewer Overflow)	N	Sludge	S	Records/Reports	N	Other:

PRELIMINARY INSPECTION/SCREENING FINDINGS*

*These findings are considered preliminary and identify specific compliance issues discovered during the above noted inspection that the designated agent of IDEM believes may be a violation of statute(s), rule(s), or permit(s) issued by IDEM.

SINGLE MEDIA INSPECTION:

- No violations were discovered with respect to the particular items observed during the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- 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)
- Additional information/review is required to evaluate overall compliance. (6)
- Potential problems were discovered or observed. (3)

Comments Regarding Ratings:

The Following Facility Records Were Reviewed:
Discharge Monitoring Reports
Monthly Report of Operations

The Following Laboratory Records Were Reviewed:
TSS Bench Sheet
CBOD Bench Sheet
Ammonia Bench Sheet

DMRs and MROs reviewed: from May 2011 to August 2011.

Receiving Waters Comments:

Receiving Waters not evaluated due to inadequate access to the outfall. IDEM does recognize that a 30 foot wide path is available for access; however, the path is strictly mud and no final grading has been completed. This is a safety concern as well.

Effluent Appearance Comments:

Effluent appearance was rated as marginal due to turbidity at the time of inspection.

Permit Comments:

The facility has a valid permit which was issued in March 2011. The facility description, including units of treatment and receiving stream, is accurate.

Facility/Site Comments:

The overall housekeeping and access to all units of treatment is unsatisfactory. At the time of the inspection, there was virtually no gravel or solid surface throughout and excessive mud. The walking surface throughout the facility was considered to be a safety concern as well. The access to the main plant (aeration/clarifiers/sludge holding) was inadequate. Furthermore, access to the lift station, outfall (as noted above), blower building and laboratory/office was also determined to be inadequate. This is a violation of Part II. A. 16 of the permit.

The following items were also identified during the inspection and are in violation of Part II. B. 1 of the permit:

A. The influent pumps are causing 'surge' flows into the plant rather than pumping a more consistent influent wastestream. This is contributing to the turbidity noted in the final effluent.

B. A review of the operator daily logs sheets indicate the control panel trips out on a regular basis. This has occurred 7 (seven) times since plant start-up in May 2011. At certain times, the result has been the influent pumps do not operate and the lift station fills. This condition has the potential to cause a significant bypass. IDEM recognizes the fact that the lift station has a sound and light alarm, but considering the location of the plant, these may not be sufficient. The plant telemetry system has not yet been completed.

C. The facility has a total of 5 (five) blowers, but only 3 (three) were found in working condition. At the time of the inspection, 1 blower had a broken line and another was not working.

D. The clarifier scum line in the north clarifier is approximately 6" underwater and essentially not operating as designed. The scum lines from both clarifiers return back to the sludge holding/digester tank. This is adding unnecessary water to the sludge/digester tank.

E. There is no potable or non-potable water at the facility. A non-potable source would allow the operator to wash down tanks and for general cleaning purposes. IDEM also has concerns that, while working with sewage, there is no ability to even wash your hands.

Operation Comments:

Operation was rated as marginal upon inspection. The mixed liquor at the inspection was again determined to be thin; however, the color appeared improved. The MLSS were in a range of approximately 600 to 800 mg/l. The north clarifier was covered in duckweed and the south clarifier indicated inadequate settling. Also, the south clarifier has some sludge/ashing on the surface. The operator reports adding seed sludge, to increase the biomass, in an upstream manhole. This is not an ideal location to properly seed the plant. However, the plant is not accessible to seed directly into the plant (as noted above). The UV bulbs are cleaned on a regular basis.

The facility is designed as 2 trains, plants that operate independently of each other in aeration and clarification. The 2 trains utilize a shared influent equalization tank, disinfection (UV) and final discharge point.

Maintenance Comments:

Maintenance was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which states, in part, that the facility shall have an ongoing preventative maintenance program for the sanitary sewer system. IDEM does understand that this issue was noted in the last

inspection and you did not agree with the finding. However, in an email following the inspection, it was explained that it is IDEM's policy to address collection system issues in the maintenance category. A records review determined that you reported a facility capacity of treated water, in May 2011, as 123%. The following months have been extremely dry and therefore not an accurate indication that any improvements have been completed.

IDEM does note the facility is new and preventative maintenance has not yet been conducted. However, please note the permit also requires a preventative maintenance program for all units of treatment, including the collection system and lift station. This program requires documentation of the maintenance conducted.

Self-Monitoring Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted at the frequency required by the permit. The certified operator is on site, at a minimum, 6 days weekly.

Flow Measurement Comments:

The final flow meter was calibrated on May 25, 2011.

Laboratory Comments:

The bench sheets reviewed appeared to be accurate and complete. The operator conducts pH on site, however the reports were not reviewed.

Records/Reports Comments:

The Discharge Monitoring Report (DMRs) and Monthly Report of Operation (MROs) reviewed were on site and available. All appear complete and accurate.

Compliance Schedules Comments

The facility notified IDEM of the demolition of the old wastewater plant on July 22, 2011. This notification served as the initiation on the performance plan in conjunction with the existing Agreed Order. The performance plan requires 6 (six) consecutive months, during a 12 (twelve) month period, of no bypassing or overflow events. To date, the facility has not reported any bypass or overflow events; however, no documentation of actual collection system monitoring was available for review. IDEM contacted a facility representative during the inspection and was informed, in fact, that no wet weather monitoring of the collection system is being conducted.

Effluent Limits Violations Comments:

The Effluent Limits Violations evaluation generated a marginal rating. The records review conducted during the inspection indicated you reported a TSS loading violation in May 2011. This loading violation is in direct relation to the I/I noted above.

MULTI-MEDIA SCREENING (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

Multi-media screening not conducted.

POLLUTION PREVENTION

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COMPLIANCE ASSISTANCE

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call 317 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/oppta/ctap/.

SUMMARY AND CORRECTION INFORMATION

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

Written report provided at the conclusion of the inspection. If upon subsequent review, any changes to this report are deemed necessary, a revised report will be sent to the responsible official within 45 days.

IDEM REPRESENTATIVE:				
Inspector Name Lynn Raisor and Debra Dubenetzky	Signature <i>Lynn Raisor</i>	Telephone Number 317-691-0099	Date September 28, 2011	
Inspector Email Lraisor@idem.IN.gov			Time In 10:00 AM	Time Out 12:15 PM
FACILITY REPRESENTATIVE:				
Printed name	Signature	Title	Telephone Number	Date
FOR IDEM INTERNAL USE:				
IDEM Manager Review <i>Debra Dubenetzky</i>	Date 10-17-11	For: <input type="checkbox"/> Follow up <input type="checkbox"/> Enforcement <input type="checkbox"/> NPDES permits <input type="checkbox"/> Other		

Inspection Photographs

Facility Inspected: Howard County Utilities, Howard County
NPDES Permit No. IN0063754

Date Inspected: September 28, 2011

Photos Taken By: Lynn Raisor
IDEM, OWQ
Wastewater Inspection Section
317-233-2488
lraisor@idem.in.gov

Comments:

All photos were taken during the inspection noted above. All photos were downloaded from the camera media card and printed with no changes or alterations to any of the images.



Driveway
01



Path from Lab to plant
02



Area from plant to lift station
04



Outfall
05



Aeration system
06



North Clarifier (note duckweed on surface)

07



Sludge holding tank (bottom of pic). Note scum line (top center of pic)

08



Wastewater Facility Notice of Inspection

State Form 54290 (5-10)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FACILITY AND INSPECTION INFORMATION

NPDES Permit Number IN0063754	Facility Type Code Semi-Public	Minor	Classification Per Permit II
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This is to notify you that on **September 28, 2011**, an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

Type Of Inspection: **Reconnaissance Inspection**

Name and Location of Facility Inspected Howard County Utilities, Inc. WWTF 678 South 950 West Russiaville, Indiana 46979	County Howard	Receiving Waters/POTW Wildcat Creek	Permit Expiration Date 3/31/2016
			Facility Design Flow .20 MGD

On Site Representative(s)

Name	Title	Facility phone	Cell phone	Email
Doug Whitman	Certified Operator	317-331-0511		

Certified Operator Doug Whitman	Number 13968	Class IV	Renewal Effective Date 7/21/2011	Expiration Date 6/30/2013	Hours/Week 5-6
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Responsible Official

Mr. Scott Lods

Howard County Utilities, Inc.

3350 West 250 North

West Lafayette, Indiana 47906

Title **President**

Email

Telephone

Fax

Contacted?

No

AREAS EVALUATED DURING INSPECTION

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

N Receiving Waters	N Facility/Site	S Self-Monitoring	N Compliance Schedules
S Effluent Appearance	S Operation	S Flow Measurement	NA Pretreatment
S Permit	N Maintenance	N Laboratory	N Effluent Limits Violations
S CSO/SSO (Sewer Overflow)	N Sludge	N Records/Reports	N Other:

PRELIMINARY INSPECTION/SCREENING FINDINGS*

*These findings are considered preliminary and identify specific compliance issues discovered during the above noted inspection that the designated agent of IDEM believes may be a violation of statute(s), rule(s), or permit(s) issued by IDEM.

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- Violations were discovered and may subject you to an appropriate enforcement response. (1)
- Additional information/review is required to evaluate overall compliance. (6)
- Potential problems were discovered or observed. (3)

Comments Regarding Ratings:

MULTI-MEDIA SCREENING (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

Multi-media screening not conducted.

POLLUTION PREVENTION

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SUMMARY AND CORRECTION INFORMATION

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Written report provided at the conclusion of the inspection. If upon subsequent review, any changes to this report are deemed necessary, a revised report will be sent to the responsible official within 45 days.

IDEM REPRESENTATIVE:

Inspector Name Lynn Raisor and Debra Dubenetzky	Signature <i>Lynn Raisor</i>	Telephone Number 317-691-0099	Date September 28, 2011	
Inspector Email Lraisor@idem.IN.gov			Time In 10:00 AM	Time Out 12:15 PM

FACILITY REPRESENTATIVE:

Printed name	Signature <i>[Signature]</i>	Title OPERATOR	Telephone Number 317 331-0511	Date 9-28-11
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FOR IDEM INTERNAL USE:

IDEM Manager Review	Date	For: <input type="checkbox"/> Follow up <input type="checkbox"/> Enforcement <input type="checkbox"/> NPDES permits <input type="checkbox"/> Other
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IDEM WASTEWATER PRE-INSPECTION CHECKLIST

Name and Location of Facility to be Inspected:	NPDES Permit #:	GPS Coordinates Recorded:	Date to be Inspected:	Inspector:
Name: Howard County Utilities, Inc. WWTF Town/City: Russiaville County: Howard	IN0063754	No	5/26/2011	Lynn Raisör

1. PRE-INSPECTION FILE REVIEW WAS CONDUCTED.	Yes
--	-----

2. REVIEW RELEVANT PROGRAM PERMIT AND PERMIT APPLICATIONS.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011	Reviewed current permit.	

3. REVIEW PRIOR INSPECTION HISTORY & REPORTS RELEVANT TO THE PROGRAM INSPECTION, PARTICULARLY ANY OUTSTANDING OR UNRESOLVED ISSUES.			No
New Facility has not been Inspected.			
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011		

4. REVIEW PRIOR COMPLIANCE AND ENFORCEMENT HISTORY RELEVANT TO PROGRAM INSPECTION, PARTICULARLY: WARNINGS AND MINOR VIOLATIONS, FORMAL ACTIONS (OE &/OR EPA)			No
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011	Reviewed Agreed Order	

5. REVIEW FACILITY RESPONSES TO ALL OF THE ABOVE.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011	Reviewed Compliance Plan correspondence. Reviewed response to previous Violation Letter(s).	

6. REVIEW FACILITY RECORDS, REPORTS, SELF-MONITORING DATA CURRENTLY AVAILABLE.			No
Will review data on site.			
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011		

7. REVIEW MAPS SHOWING FACILITY LAYOUT AND WASTE MANAGEMENT/DISCHARGE SITES.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011	Inspector familiar with layout.	

8. REVIEW RECORDS OF CITIZEN'S COMPLAINTS.			No
None known.			
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011		

9. REVIEW ANY PROCESS INFORMATION.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011	Inspector familiar with facility process.	

10. REVIEW AND DETERMINE APPLICABLE REQUIREMENTS.			Yes
Info Source	Date Reviewed	Inspector Notations Pertinent to Upcoming Inspection:	
Inspector file	9/28/2011	NPDES	



Lakeland InnovaTech

Where Engineering Begins and Service Never Ends

DO# 11333

DATE: 9 December, 2011

TO: Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

ATTENTION: Mr. Donald R. Daily
Inspection Section Chief
Compliance Branch
Office of Water Quality

SUBJECT: Wastewater Treatment Plant
Green Acres Golf Course and Subdivision
Howard County Utilities, Inc.
Russiaville, Howard County, Indiana
NPDES Permit No. IN0063754

PROJECT NO.: 11-017
Please refer to this number when corresponding.

Dear Mr. Daily:

We have been requested by Howard County Utilities, Inc. to review your Inspection Summary/Referral to the Office of Water Quality Enforcement Section letter dated October 21, 2011 and provide any additional comments and data to supplement the previously E-mailed comments from Mr. Nicholas Kile, the Utilities legal representative, dated June 2, 2011. These comments were in reference to IDEM's site inspections of May 26, 2011 and September 28, 2011.

We will address the comments in the same order that they were listed in the October 21, 2011 letter.

1. HCU RESPONSE TO IDEM COMMENT ONE

Issue a – Construction Site

We will address the items in IDEM Comment One in the same order that they are listed. However, we first want to state an obvious fact, which is that IDEM's inspectors do not seem to understand that the Green Acres Wastewater Treatment Plant is still a construction site. Therefore NPDES Permit Part II, B.1 is not applicable at this time. We inspected the treatment plant on May 17, 2011 and certified that the plant was "Substantially Completed".

DUCC Attachment 1 of 5
Howard County
Cause No. 45360
Page 64 of 124
IN0063754

IDEM
OFFICE OF
WATER QUALITY
2011 DEC 12 P 1:17

Substantially Completed is a standard term which is defined by the American Institute of Architects (AIA) in their Document A201 as follows:

§9.8 SUBSTANTIAL COMPLETION

§9.8.1 Substantial Completion is the stage in the progress of the Work when the Work or designated portion thereof is sufficiently complete in accordance with the contract Documents so that the Owner can occupy or utilize the Work for its intended use.

Therefore, the project was in the stage in its progress where the plant was capable of treating wastewater. This does not mean that the project's jobsite was complete in regard to such items as final site grading, fencing, gravel walkways, etc. Since the treatment plant site is still a construction site one should expect to see construction items such as ladders, pipes, conduits and mud, mud and more mud. It is the responsibility of the IDEM inspectors to be properly dressed to inspect a construction site. The IDEM inspector even notified OSHA about some electrical issues on the plant site and the OSHA inspector stated that these were not violations because this was a construction site and one would expect these type of conditions on a construction site, but this fact is not obvious to IDEM's inspectors.

The following work still must be completed at the site or has just been recently completed:

1. Final site grating including leveling the ground around all sides of the wastewater treatment tank and the lift station's wet well and valve pit.
2. After the ground has settled (it can take up to 6 to 12 months), a 6-ft. 0-in. high chain link fence with barb wire will be installed around the treatment plant.
3. After the ground has settled and all underground utilities such as portable water lines, air lines, wiring and any other buried utilities have been installed and buried, then gravel driveways and walkways will be installed and several of these have already been completed.
4. A stairway is installed to access the treatment plant walkway and a temporary stone walkway has been installed to access the stairway from the new concrete walkways.

All above listed items must be completed before we can issue our final certificate letter of completion. Naturally, the work must be done in a sequential manner and not necessarily in the order listed above.

Since all the above work must be accomplished outdoors, the completion schedule will be determined by the weather. It is the intention of HCU to have this work completed as soon as possible.

Issue b - Access to Plant Outfall Location

The day of the inspection, September 28, 2011, was after three (3) successive days of rain and on the day of the inspection the site received 0.04 inches of rain. It should be noted that the new Green Acres Wastewater Treatment Plant is located in the flood fringe with the top of all treatment

tanks and lift station tops located a minimum two (2) feet above the 100-year flood elevation as required by IDEM's rules and regulations. The treatment plant location and design were approved by IDEM's Facility Construction Section and a Construction Permit Approval No. 19366R was issued on March 26, 2009. The treatment plant is being constructed per the approved construction documents.

The treatment plant's discharge point to Wildcat Creek is located in the floodway of the area's flood plain. Therefore, when it rains this area is either under water or very muddy which makes inspection during wet weather very difficult, if not impossible. The Utility is not considering installing a walkway to the effluent discharge point at Wildcat Creek because it does not have a permit from the Department of Natural Resources (DNR) for construction in a flood way. Even if it is constructed, it still might not be possible to access the discharge point if this walkway is underwater. Also, any gravel, asphalt or concrete walkway would be washed away during flooding. The weeds will be kept cut so access is available during dry weather.

1.A. HCU RESPONSE TO IDEM COMMENT ONE (1)

There are two (2) issues stated in IDEM Comment One (A) and they are not connected. We will discuss each issue separately.

Issue a

This issue is completely false. The influent sewage pumps discharge the incoming wastewater to a 190,000 gallon equalization (surge) tank. It is referred to as an equalization (surge) tank because it dampens the hydraulic flow to the aeration tanks. This is accomplished because smaller sized surge pumps, pump the incoming sewage to a flow divider box which is designed to split the pumped sewage into three (3) separate flow paths which are as follows:

- a. One portion of the flow is diverted to Aeration Tank No. 1.
- b. One portion of the flow is diverted to Aeration Tank No. 2.
- c. The third or excess flow is diverted back to the equalization (surge) tank.

The flow divider box is furnished complete with two (2) V-notch weir plates and one (1) broad weir. These weirs are designed to allow equal flow to be distributed to one or both aeration tanks with the excess flow to be directed to the equalization (surge) tank. Therefore, a predetermined flow rate can be sent to each aeration tank eliminating any "surge" flows.

Issue b

Turbidity, a measure of the light-transmitting properties of water, is another test used to indicate the quality of waste discharges and natural waters with respect to colloidal and residual suspended matter. The measurement of turbidity is based on comparison of the intensity of light scattered by a sample as compared to the light scattered by a reference suspension under the same conditions. Colloidal matter will scatter or absorb light and thus prevent its transmission. There is a reasonable relationship between turbidity and suspended solids for the settled secondary effluent from the activated sludge process. Within limits, it has been shown that the suspended solids

concentrations found in treated wastewater can be correlated to turbidity measurements. A typical relationship for the effluent from a complete mix, activated sludge process is the following:

$$\text{Suspended Solids, SS, mg/L} = (2.3 \text{ to } 2.4) \times (\text{turbidity, NTU})$$

Therefore, it does not matter if the final effluent is turbid or not since the NPDES permit only requires the Utility to test for the effluent Total Suspended Solids concentrations. Whether a turbidity test or a Total Suspended Solids test is performed, the result will indicate the solids concentration in the plant's final effluent. The total suspended solids concentration for the plant is as follows:

<u>TOTAL SUSPENDED SOLIDS (TSS)</u>		
(Quality or Concentration)		
<u>MONTH</u>	<u>Monthly Average, mg/l</u> (Permitted, 30.0 mg/l)	<u>Maximum Weekly Average, mg/l</u> (Permitted, 45.0 mg/l)
May, 2011	17.6	24.5
June, 2011	8.8	13.0
July, 2011	4.6	6.37
August, 2011	11.9	14.1
September, 2011	14.6	16.7

Since the plant's effluent meets and/or exceeds the permitted solids concentration, turbidity has no meaning or significance.

1.B. HCU RESPONSE TO IDEM COMMENT ONE (B)

The above is one of the various issues that must be resolved during the completion of the Green Acres Treatment Plant. The Utility was aware of this problem which was caused by the lift station PLC controller being programmed to operate three (3) influent sewage pumps and not the two (2) which were installed because the third pump is a future pump, which will be installed at a later date when additional development is constructed. Therefore, occasionally whenever the third pump was indicated to operate, the PLC program would trip the circuit. This problem has recently been corrected and there were never any overflows.

Once again, the treatment system has not been completed and the Utility is working on the final punch list. One of the items still on the punch list is to connect the plant's telemetry system.

1.C. HCU RESPONSE TO IDEM COMMENT ONE (C)

The Utility is fully aware of the blower situation and will address it as soon as possible. This punch list item is not critical since one (1) blower will provide sufficient oxygen to the process. If the IDEM inspectors reviewed the plant's MROs, they would see that the aeration tanks mixed liquor oxygen level ranged between 5.0 to 6.0 mg/l and never fell below 4.4 mg/l.

1.D. HCU RESPONSE TO IDEM COMMENT ONE (D)

Repairing the final clarifier surface skimmer is on the Utility's Punch List and will be done as soon as possible.

In regard to the location of the scum skimmer discharge location we were informed by IDEM's Facility Construction Section that the final tank skimmings are to be discharged to the sludge holding tank and not the aeration tanks. Once again, IDEM cannot make up its mind as to what Section makes the rules. It would be nice to have IDEM's various sections communicate with each other.

In this case we agree that the scum skimmer should discharge to the aeration tanks and this modification has been recently completed.

1.E. HCU RESPONSE TO IDEM COMMENT ONE (E)

Installation of a potable water system was always in the plans. The potable water well has been installed and the Utility is currently installing the potable water system piping and fittings.

2. HCU RESPONSE TO IDEM COMMENT TWO

We fully agreed with Mr. Nicholas Kile's response to this comment in his E-mail dated June 2, 2011.

The Green Acres collection system is a 100% separate sanitary sewer system by design. When this system was obtained by Howard County Utilities, Inc., their first action was to conduct a sanitary sewer inspection. The Utility televised the sewer lines and inspected all of the system manholes. The collection system does not have any lift stations. The only lift station is the treatment plant influent lift station. Unfortunately, the best that can be achieved by any Utility is the reduction of I/I but rarely if ever can it be eliminated. To accomplish any appreciable reductions in I/I, many times requires the replacement of large portions of the existing sewer lines. This is cost-prohibitive because there are no plans showing the location, size or even depth of the sewer lines. Even if the sewers are repaired/replaced, it might not eliminate or significantly reduce the I/I.

Accordingly, the Utility designed and constructed a new wastewater treatment plant to treat any I/I which still existed after the sanitary sewer collection system was inspected and repairs made. The amount of I/I is not only a function of the condition of the sanitary sewer system but also a function of the weather which the Utility cannot control.

The new Green Acres Wastewater Treatment Plant was designed to handle the following flow rates:

Average Daily Flow Rate (ADF): 200,000 GPD
Peak Dry Weather Flow (PDWF): 300,000 GPD
Peak Wet Weather Flow (PWWF): 500,000 GPD

In addition, the treatment plant was constructed with a 190,000 gallon capacity equalization/surge tank. Therefore, the plant was designed for not only the domestic wastewater but also a significant amount of I/I.

The question therefore is if the new treatment plant can handle large storm flows. Based on the results of May, June, July, August and September 2011, there were no upsets of the plant, no plant

bypassing and no manhole overflows. In fact, IDEM's inspection on May 26, 2011 after a very heavy rain event found no bypassing or manhole overflows. The IDEM inspector stated in the inspection report the following:

"IDEM inspected manholes in the collection system that have historically overflowed during rain events. The area has received over 2 inches of rain in the past 24 hours and the manholes were not overflowing."

In addition the IDEM inspector stated:

"At the time of the inspection, the effluent flow was approximately 0.40 mgd."

Since the treatment plant was designed to handle a peak wet weather flow rate of 0.50 MGD and there were no bypasses or manhole overflows in the sanitary collection system, we therefore do not see where there are any problems and the system did not violate its NPDES Permit Part II, b.1.

3. HCU RESPONSE TO IDEM COMMENT THREE

Howard County Utilities has requested its attorney to officially request a release from Agreed Order Case No. 2007-17191-W. Any future questions and/or comments should be addressed to:

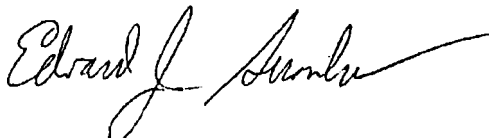
Barnes & Thornburg
Attorneys at Law
11 South Meridian Street
Indianapolis, Indiana 46204-3535
TEL: (317) 236-1313
Attention: Nicholas K. Kile

We hope the above meets with your approval and please do not hesitate to contact us if we can provide you with any additional information. We will keep you informed as to HCU's progress in completing the remaining items.

Thank you.

Very truly yours,

Lakeland InnovaTech



Edward J. Serowka, P.E.
President

Copy: Scott Lods, Howard County Utilities
Nicholas Kile, Barnes & Thornburg
Mark Stanifer, OWQ Enforcement Section



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Thomas W. Easterly
Commissioner

January 20, 2012

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

VIA CERTIFIED MAIL 91 7190 0005 2710 0019 2110

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Re: **Inspection Summary/ Referral to the Office of
Water Quality Enforcement Section**
Howard County Utilities, Inc. Wastewater Treatment
Facility
NPDES Permit No. IN0063754
Russiaville, Howard County

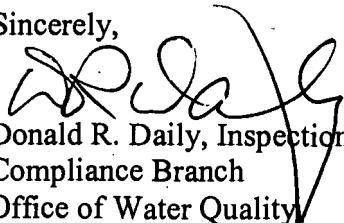
Dear Mr. Lods:

Thank you for your response dated December 9, 2011. The response failed to provide timelines for the completion of items 1.C, 1.D and 1.E, as noted in the Violation Letter from this office.

A copy of the Violation letter is enclosed for your reference.

Within twenty (20) days of receipt of this letter, a written detailed response detailing timelines for the completion of the items noted 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 a referral to Office of Water Quality's Enforcement Section. Please direct your response to this letter to the attention of Lynn Raisor. Any questions regarding this matter should be directed to Lynn Raisor at 317-691-0099 or by email to Lraisor@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,


Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

Cc: Mark Stanifer, OWQ Enforcement Section



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Indianapolis, Indiana 46204
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Toll Free (800) 451-6027
www.idem.IN.gov

October 21, 2011

VIA CERTIFIED MAIL 91 7190 0005 2710 0017 6691

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Re: **Inspection Summary/ Referral to the Office of Water
Quality Enforcement Section**
Howard County Utilities, Inc. Wastewater Treatment
Facility
NPDES Permit No. IN0063754
Russiaville, Howard County

Dear Mr. Lods:

On September 28, 2011, a representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an inspection of the Howard County Utilities, Inc. Wastewater Treatment Facility, located in Russiaville, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Reconnaissance Inspection

Results of Inspection: Violations were observed but corrected during the inspection.
 Violations were observed.
 Violations were observed and will be referred to the Enforcement Section.

The following specific items were noted:

1. The overall housekeeping and access to all units of treatment is unsatisfactory. At the time of the inspection, there was virtually no gravel or solid surface throughout and excessive mud. The walking surface throughout the facility was considered to be a safety concern as well. The access to the main plant (aeration/clarifiers/sludge holding) was inadequate. Furthermore, access to the lift station, outfall, blower building and laboratory/office was also determined to be inadequate. This is a violation of Part II. A. 16 of the permit. Also, the following items were identified during the inspection and are in violation of Part II. B. 1 of the permit:

A. The influent pumps are causing 'surge' flows into the plant rather than pumping a more consistent influent wastestream. This is contributing to the turbidity noted in the final effluent.

B. A review of the operator daily logs sheets indicate the control panel trips out on a regular basis. This has occurred 7 (seven) times since plant start-up in May 2011. At certain times, the result has been the influent pumps do not operate and the lift station fills. This condition has the potential to cause a significant bypass. IDEM recognizes the fact that the lift station has a sound and light alarm, but considering the location of the plant, these may not be sufficient. The plant telemetry system has not yet been completed.

C. The facility has a total of 5 (five) blowers, but only 3 (three) were found in working condition. At the time of the inspection one blower had a broken line and another was not working.

D. The clarifier scum line in the north clarifier is approximately 6" underwater and essentially not operating as designed. The scum lines from both clarifiers return back to the sludge holding/digester tank. This is adding unnecessary water to the sludge/digester tank.

E. There is no potable or non-potable water at the facility. A non-potable source would allow the operator to wash down tanks and for general cleaning purposes. IDEM also has concerns that, while working with sewage, there is no ability to even wash your hands.

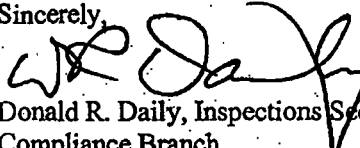
2. Maintenance was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which states, in part, that the facility shall have an ongoing preventative maintenance program for the sanitary sewer system. IDEM does understand that this issue was noted in the last inspection and you did not agree with the finding. However, in an email following the inspection, it was explained that it is IDEM's policy to address collection system issues in the maintenance category. A records review determined that you reported a facility capacity of treated water, in May 2011, as 123%. The following months have been extremely dry and therefore not an accurate indication that any improvements have been completed. IDEM does note the facility is new and preventative maintenance has not yet been conducted. However, please note the permit also requires a preventative maintenance program for all units of treatment, including the collection system and lift station. This program requires documentation of the maintenance conducted.

3. The facility notified IDEM of the demolition of the old wastewater plant on July 22, 2011. This notification served as the initiation on the performance plan in conjunction with the existing Agreed Order. The performance plan requires 6 (six) consecutive months, during a 12 (twelve) month period, of no bypassing or overflow events. To date, the facility has not reported any bypass or overflow events; however, no documentation of actual collection system monitoring was available for review. IDEM contacted a facility representative during the inspection and was informed, in fact, that no wet weather monitoring of the collection system is being conducted.

Marginal ratings were given to the Effluent Appearance, Operation and Effluent Limits Violations portion of the NPDES Facility Notice of Inspection. IDEM did note compliance concerns in these areas. The housekeeping and maintenance violations and operational concerns were also noted in a May 26, 2011 inspection, resulting in a June 29, 2011 Violation Letter from this office. The NPDES Facility Notice of Inspection has been revised to properly reflect the overall rating in each area of evaluation. A copy of the revised report is enclosed for your records.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your existing Agreed Order, Case No. 2007-17191W. As items #1 and #2 listed above are not addressed within your existing agreed order, a written detailed response documenting correction of this item and/or a plan for assuring future compliance must be submitted to this office within thirty (30) days of receipt of this letter. Failure to respond adequately to this letter may result in an additional referral to the OWQ Enforcement Section. Please direct your response to this letter to the attention of Lynn Raisor. Any questions regarding this matter should be directed to Lynn Raisor at 317-691-0099 or by email to Lraisor@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,


Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

Cc: Mark Stanifer, OWQ Enforcement Section

Howard County
IN0063754



Where Engineering Begins and Service Never Ends

DATE: February 7, 2012

TO: Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

ATTENTION: Mr. Donald R. Daily
Inspection Section Chief
Compliance Branch
Office of Water Quality

SUBJECT: Wastewater Treatment Plant
Green Acres Golf Course and Subdivision
Howard County Utilities, Inc.
Russiaville, Howard County, Indiana
NPDES Permit No. IN0063754

PROJECT NO.: 11-017
Please refer to this number when corresponding.

Dear Mr. Daily:

We have been requested by Howard County Utilities, Inc. to review and respond to your letter dated January 20, 2012.

Please note, as we stated in our letter of December 9, 2011, that this project has not been completed and still requires some additional work along with correction of the punch list items.

We are using the timeline for this project that has been established by Indiana Department of Environmental Managements' Facility Construction and Engineering Support Section which is that the project must be completed within five (5) years of the date of the construction permit if not extended by IDEM upon the request of the Utility. Therefore, construction permit Approval No. 19366R was issued on March 26, 2009 with a construction end date of March 26, 2014. We can assure you that the Howard County Wastewater Treatment Plant will be completed and certified as complete no later than March 26, 2014. In fact, we are hoping to have the project completed earlier if possible.

The following is the status of Items 1.C, 1.D and 1.E listed in the Violation Letter dated October 21, 2011.

1.C HCU RESPONSE TO IDEM COMMENT ONE (C)

All five (5) air blowers have been inspected and are properly installed and operating. The three (3) aeration tank blowers are shown in attached Photo 1 and the two (2) equalization/sludge holding tank blowers are shown in attached Photo 2.

1.D. HCU RESPONSE TO IDEM COMMENT ONE (D)

The final clarifier surface skimmer has been corrected

1.E. HCU RESPONSE TO IDEM COMMENT ONE (E)

The potable water well and system has been installed.

We hope the above meets with your approval and please do not hesitate to contact us if we can provide you with any additional information. We will keep you informed as to HCU's progress in completing the remaining items.

Thank you.

Very truly yours,

Lakeland InnovaTech



Edward V. Serowka, P.E.
President

Copy: Scott Lods, Howard County Utilities
Nicholas Kile, Barnes & Thornburg
Mark Stanifer, OWQ Enforcement Section

**WASTEWATER TREATMENT PLANT
GREEN ACRES GOLF COURSE AND SUBDIVISION
HOWARD COUNTY UTILITIES, INC.
REUSSIAVILLE, HOWARD COUNTY, INDIANA
LAKELAND INNOVATECH PROJECT RFQ 11-017**



PHOTO 1

AERATION TANK BLOWERS

**WASTEWATER TREATMENT PLANT
GREEN ACRES GOLF COURSE AND SUBDIVISION
HOWARD COUNTY UTILITIES, INC.
REUSSIAVILLE, HOWARD COUNTY, INDIANA
LAKELAND INNOVATECH PROJECT RFQ 11-017**



PHOTO 2

EQUALIZATION/SLUDGE HOLDING TANK BLOWERS

**WASTEWATER TREATMENT PLANT
GREEN ACRES GOLF COURSE AND SUBDIVISION
HOWARD COUNTY UTILITIES, INC.
REUSSIAVILLE, HOWARD COUNTY, INDIANA
LAKELAND INNOVATECH PROJECT RFQ 11-017**



PHOTO 3

CONTROL BUILDING POTABLE WATER INLET CONNECTION



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

September 13, 2012

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Thomas W. Easterly
Commissioner

www.idem.IN.gov

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West County Road 250 North
West Lafayette, Indiana 47906

Dear Mr. Lods:

Re: Inspection Summary Letter
Howard County Utilities WWTP
NPDES Permit No. IN0063754
Russiaville, Howard County

A representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an inspection of the Howard County Utilities WWTP, located in Russiaville, Indiana. This inspection was conducted pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: August 23, 2012
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Potential problems were discovered or observed.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your Agreed Order, Case No. 2007-17191-W. Please direct any response to this letter and any questions to Aaron Deeter at 317-691-1915 or by email to ADEETER@idem.IN.gov. A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records.

Sincerely,

Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

Cc: Mary Hollingsworth, IDEM SWOE Branch



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0063754		Facility Type: Mixed Ownership		Facility Classification: II		TEMPO AI ID	
Date(s) of Inspection: August 23, 2012							
Type of Inspection:		Compliance Evaluation Inspection					
Name and Location of Facility Inspected: Howard County Utilities WWTP 678 South 950 West Russiaville IN 46979				Receiving Waters/POTW: Wildcat Creek		Permit Expiration Date: 3/31/2016	
County: Howard						Design Flow: 0.20 MGD	
On Site Representative(s):							
First Name	Last Name	Title	Email			Phone	
Doug	Whitman	Cert. Operator				317-331-0511	
Eric	Klopfenstein	Maintenance				765-463-3856	
Certified Operator: Doug Whitman		Number: 13968	Class: IV	Effective Date: 7-1-11	Expiration Date: 6-30-13	Hours/Week: 5-10	
Responsible Official: Mr. Scott Lods, President 3350 West County Road 250 North West Lafayette, Indiana 47906				Permittee: Howard County Utilities, Inc. Email: asu-inc@hotmail.com Phone: 765-463-3856 Fax: Contacted? No			
INSPECTION FINDINGS							
SINGLE MEDIA INSPECTION OVERALL RATING:							
<input type="radio"/> No violations were discovered with respect to the particular items observed during the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1) <input type="radio"/> Additional information/review is required to evaluate overall compliance. (6) <input checked="" type="radio"/> Potential problems were discovered or observed. (3)							
AREAS EVALUATED DURING INSPECTION							
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	S	Compliance Schedules
S	Effluent Appearance	S	Operations	S	Flow Measurement	N	Pretreatment
S	Permit	M	Maintenance	N	Laboratory	S	Effluent Limits Compliance
S	CSO/SSO (Sewer Overflow)	N	Sludge	S	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
Receiving Waters:							
S 1. The receiving stream is visibly free of excessive deposits of settled solids, floating debris, oil, scum, or foam.							
Comments: The receiving stream was observed at the outfall and was lower than normal, but was free of notable foam, algae, sheen, or solids.							
Effluent Appearance:							
S 1. Treated effluent is essentially free of excessive deposits of settled solids, floating debris, oil, scum, or foam.							
Comments: The effluent was observed at the outfall pipe and from a grab sample taken by the operator at the final flow meter weir and was clear and free of color at the time of the inspection.							
Permit:							
N 1. A permit renewal application was submitted to IDEM at least 180 days prior to the expiration date.							
S 2. The facility description, including the receiving waters, is complete and accurate.							
N 3. The permit has been properly transferred.							
Comments: The facility has a valid permit and the facility description, including the receiving stream, is accurate.							

CSO/SSO:

- N 1. CSO structures are adequately monitored and maintained.
- S 2. The facility has had no unauthorized sewer overflow events in the past six months.
- N 3. SSO and dry weather CSO discharges have been properly reported.
- N 4. Any adverse impacts from SSO and CSO discharges have been properly mitigated.

Comments:

The facility's collection system is comprised of 100% separated sanitary sewers by design with no overflow or bypass points and have not reported any SSO events in last twelve months.

Facility/Site:

- S 1. The facility has standby power or equivalent provision.
- S 2. An adequate alarm or notification system for power or equipment failure is available for the treatment facility.
- S 3. Safe and adequate access is provided for inspection of all treatment units and outfalls.
- 4. List any safety concerns noted during the inspection in the box below:

Comments:

At the time of inspection access to all units of treatment was safe and adequate. The facility has a standby generator that is tested on a regular basis every two weeks.

Operations:

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

Comments:

All units of treatment appear to be operating efficiently. Good mixing and color was noted in the aeration tanks. The facility has not needed to waste any sludge from the aeration tanks since the plant started up last May. The new plant was seeded from sludge from the old plant and has needed time to build up its mass due to the new plant being three times as big as the old plant. The suspended solids in the aeration tanks are averaging about 4500 mg/l a week and operator is comfortable with starting to waste in the next couple weeks.

Maintenance:

- S 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- M 2. Facility maintenance activities appear adequate.
- S 3. Lift station procedures include:
 - a. Adequate alarm or notification system for equipment failure.
 - b. Adequate inspections, cleaning, and maintenance activities.
 - c. Adequate documentation of all procedures
- S 4. Collection system maintenance activities appear adequate.

Comments:

The Maintenance was rated as marginal due to the UV channel weir being in need of cleaning. A records review showed that the UV channel has been cleaned in the past but cleaning of this channel needs to be on a more regular basis. Maintenance records for the treatment facility were reviewed during the inspection and appeared adequate. The facility continues to inspect the collection system for inflow and infiltration (I/I) problems and found a section of main sewer line earlier this spring in need of being replaced. The facility is looking into replacing this section of sewer line in the near future.

Sludge:

- N 1. Sludges, screenings, and slurries are handled and disposed of properly.

Comments:

Sludge Disposal was not evaluated because the sewage plant was just started last year and has not needed to remove any sludge from site.

Self-Monitoring:

- S 1. Samples are taken at pre-designated locations and are representative.
- S 2. Flow-proportioned samples are obtained where needed.
- S 3. The facility conducts sampling of all waste streams, including type and frequency, as required in the permit.
- S 4. Sample collection procedures, including automatic sampling, include:
 - a. Samples are refrigerated during compositing.
 - b. Proper preservation techniques are used.
 - c. Containers and holding times conform to 40 CFR 136.3.
- S 5. Sample documentation is adequate and includes:
 - a. Date, time, and location of sampling.
 - b. Name of individual performing sampling.
 - c. Instantaneous flow for flow-weighted aliquots.
- N 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements are being met.

Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. The facility grabs effluent samples after the weir of the final flow meter.

Flow Measurement:

- S 1. Flow is properly monitored as required by the permit.
- S 2. Flow charts and calibration records are available for review.
- S 3. Effluent flow is used in calculating effluent loadings.

Comments:

The facility's flow monitoring program, including all documentation, is adequate and representative. The effluent flow meter was last calibrated in April 2012 by B.L. Anderson.

Laboratory:

- 1. The following laboratory records were reviewed:
CBOD Bench Sheets TSS Bench Sheets Ammonia Bench Sheets

pH/DO Bench Sheets E. coli Bench Sheets
- N 2. The laboratory practices and protocol reviewed were adequate, including:
 - a. Written laboratory QA/QC manual.
 - b. Chain-of-Custody procedures followed.
 - c. Samples are properly stored.
 - d. Approved analytical methods are used.
 - e. Calibration and maintenance of instruments is adequate.
 - f. QA/QC procedures are adequate.
 - g. Dates of analyses.
 - h. Name of person performing analyses.

Contract Lab Information

Richard Cain Labs
Jonesboro, IN
Richard Cain

Comments:

The bench sheets reviewed during the inspection appeared to be accurate and complete. Dissolved oxygen and pH are analyzed on site with a portable meter. TSS and Ammonia are analyzed at the operators full time job's lab (Chrysler). CBOD and E. Coli are analyzed at contract lab. Both of these labs were not inspected at the time of inspection.

Records/Reports:

- S 2. All facility records for the period including the previous three years were available for review.
- S 3. DMRs, MROs/MMRs, and CSODMRs are completed properly and accurately including:

- a. "No Ex" column is accurate.
- b. Signatory requirements are met.
- c. Reports are prepared by or under the direction of a certified operator.

Comments:

The requested records were available and appear complete and accurate. Reviewed only the records up to the last records reviewed during last inspection.

Compliance Schedules:

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

Comments:

The facility has completed all actions in its existing compliance plan associated with their Agreed Order. The facility has located land, designed and built new wastewater treatment facility out of the flood plain, built new lift station, applied for new NPDES permit and properly and permanently closed old wastewater treatment facility. The facility has also not reported any SSO events in the last twelve months.

Pretreatment:

- N 1. The facility operates without significant interference from industrial or other sources of toxic substances.
- N 2. For both Delegated and Non-Delegated pretreatment programs:
 - a. Industrial or commercial dischargers are regulated as required.
 - b. The permittee enforces the Sewer Use Ordinance and follows the Enforcement Guide.
 - c. The permittee submitted its annual pretreatment report to IDEM by April 1.
- N 3. Non-Delegated pretreatment programs have:
 - a. Developed or reevaluated the Sewer Use Ordinance and submitted it to IDEM.
 - b. Developed or reevaluated the Enforcement Response Guide and submitted it to IDEM.
- N 4. Pretreatment records were adequate and include:
 - a. Inventory of industrial Waste Contributors.
 - b. Monitoring data.
 - c. Inspection Reports.
 - d. Compliance status records.
 - e. Enforcement actions.


Comments:

Facility has no industrial sources.

Effluent Limits Compliance:

- Yes 1. Were DMRs reviewed as part of the inspection?
DMRs for the period of Sepetmber2011 to July2012 were reviewed as part of the inspection.
- No 2. Were violations noted during the review of DMRs?
- N 3. Overflow/Bypass and Noncompliance reporting.

Comments:

IDEM REPRESENTATIVE		
Inspector Name: Aaron Deeter	Inspector Email: ADeeter@idem.IN.gov	Inspector Phone Number: 317-691-1915
	Time In: 9:30 AM	Time Out: 11:30 PM
Other staff participating in the inspection:		
Name(s) Becky Ruark	Phone Number(s) 317-691-1909	
IDEM MANAGER REVIEW		
IDEM Manager:		Date:



This is to notify you that on 8/23/12 an inspection of HOWARD COUNTY UTILITIES WWTP
FN0063754 was conducted by the undersigned representative of the Indiana Department
of Environmental Management (IDEM), Office of WATER QUALITY.

Type of Inspection (may include more than one):

- CEI Complaint
 Multi-Media Screening Evaluation
 Other

Preliminary Inspection/Screening Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

Single Media Inspection:

- No violations were discovered with respect to the particular items observed during the inspection.
 Violations were discovered but corrected during the inspection.
 Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
 Violations were discovered and may subject you to an appropriate enforcement response.
 Additional information/review is required to evaluate overall compliance.
 Other / Comments (attachment may be included) POTENTIAL PROBLEMS WERE OBSERVED OR DISCOVERED

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- Multi-media screening not conducted.
 No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
 Potential violations were discovered but corrected during the inspection.
 Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
<u>ARON DEETER</u> <u>Becky Ruark</u>	<u>[Signature]</u> <u>Becky Ruark</u>	<u>317-691-1915</u> <u>317-691-1909</u>	<u>8/23/12</u>	In: <u>9:30 A.M.</u> Out: <u>11:30 A.M.</u>

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
<u>ERIC L KLOFFENSTEIN</u>	<u>[Signature]</u>	<u>MAINTENANCE</u>	<u>765 463 3856</u>	<u>23-AUG-12</u>

Inspection Photographs



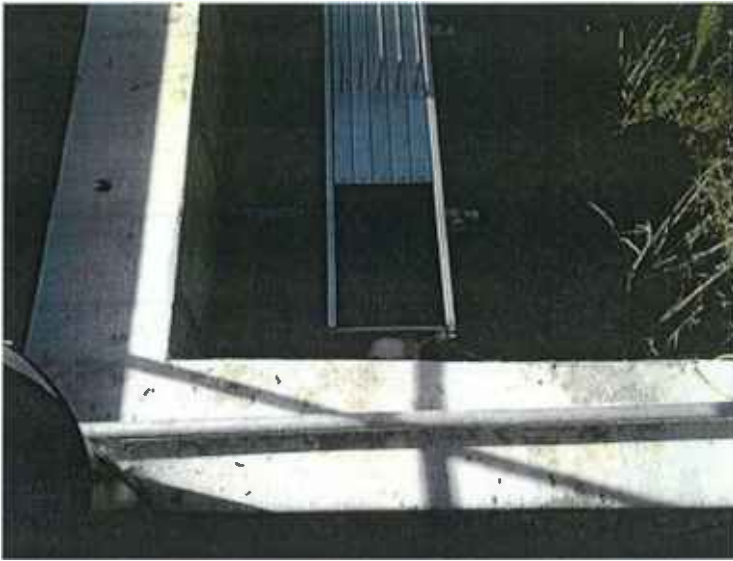
Facility:	
Howard County Utilities WWTP	
Photographer:	
Aaron Deeter	
Date:	Time:
8/23/12	
Others Present:	
Becky Ruark	
Location/Description:	
new treatment plant with grass	



Facility:	
Howard County Utilities WWTP	
Photographer:	
Aaron Deeter	
Date:	Time:
8/23/12	
Others Present:	
Becky Ruark	
Location/Description:	
aeration basin	



Facility:	
Howard County Utilities WWTP	
Photographer:	
Aaron Deeter	
Date:	Time:
8/23/12	
Others Present:	
Becky Ruark	
Location/Description:	
clarifier weir and skimmer	



Facility: Howard County Utilities WWTP	
Photographer: Aaron Deeter	
Date: 8/23/12	Time:
Others Present: Becky Ruark	
Location/Description: UV channel weir	



Facility: Howard County Utilities WWTP	
Photographer: Aaron Deeter	
Date: 8/23/12	Time:
Others Present: Becky Ruark	
Location/Description: outfall	

IDEM OWQ Wastewater Pre-Inspection Checklist

Name and Location of Facility to be Inspected:	NPDES Permit Number:	Date to be Inspected:	Inspector:
Name: Howard County Utilities WWTP Town/City: Russiaville County: Howard	IN0063754	8/23/2012	Aaron Deeter
1.	REVIEW RELEVANT PROGRAM PERMIT AND PERMIT APPLICATIONS		CHECK ONE: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E
IF NO, N/A, N/E:	Provide explanation or description why:		
IF YES:	Info Source/Date Reviewed: Inspector File 8/23/2012	Inspector Notations Pertinent to Upcoming Inspection: Inspector familiar with permit. Permit Expiration Date: 3/31/2016	
2.	REVIEW PRIOR INSPECTION HISTORY & REPORTS RELEVANT TO THE PROGRAM INSPECTION, PARTICULARLY ANY OUTSTANDING OR UNRESOLVED ISSUES.		CHECK ONE: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E
IF NO, N/A, N/E:	Explanation:		
IF YES:	Info Source/Date Reviewed: Inspector File 8/23/2012	Inspector Notations Pertinent to Upcoming Inspection:	
3.	REVIEW PRIOR COMPLIANCE AND ENFORCEMENT HISTORY RELEVANT TO PROGRAM INSPECTION, PARTICULARLY: WARNINGS AND MINOR VIOLATIONS, FORMAL ACTIONS (OE &/OR EPA)		CHECK ONE: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E
IF NO, N/A, N/E:	Explanation:		
IF YES:	Info Source/Date Reviewed: Inspector File 8/23/2012	Inspector Notations Pertinent to Upcoming Inspection: Case No. 2007-17191-W	
4.	REVIEW FACILITY RESPONSES TO ALL OF THE ABOVE.		CHECK ONE: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E
IF NO, N/A, N/E:	Explanation:		
IF YES:	Info Source/Date Reviewed: Inspector File 8/23/2012	Inspector Notations Pertinent to Upcoming Inspection: No issues	
5.	REVIEW FACILITY RECORDS, REPORTS, SELF-MONITORING DATA CURRENTLY AVAILABLE.		CHECK ONE: <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E
IF NO, N/A, N/E:	Explanation: Will review on site.		
IF YES:	Info Source/Date Reviewed: Select or type...	Inspector Notations Pertinent to Upcoming Inspection:	
6.	REVIEW MAPS SHOWING FACILITY LAYOUT AND WASTE		CHECK ONE:

	MANAGEMENT/ DISCHARGE SITES.	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E	
IF NO, N/A, N/E:	Explanation: None in file		
IF YES:	Info Source/Date Reviewed: Select or type...	Inspector Notations Pertinent to Upcoming Inspection:	
7.	REVIEW RECORDS OF CITIZEN'S COMPLAINTS.	CHECK ONE: <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E	
IF NO, N/A, N/E:	Explanation: None Recent		
IF YES:	Info Source/Date Reviewed: Select or type...	Inspector Notations Pertinent to Upcoming Inspection:	
8.	REVIEW ANY PROCESS INFORMATION.	CHECK ONE: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E	
IF NO, N/A, N/E:	Explanation:		
IF YES:	Info Source/Date Reviewed: Inspector File 8/23/2012	Inspector Notations Pertinent to Upcoming Inspection: facility description in permit	
9.	REVIEW AND DETERMINE APPLICABLE REQUIREMENTS.	CHECK ONE: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <input type="radio"/> N/E	
IF NO, N/A, N/E:	Explanation:		
IF YES:	Info Source/Date Reviewed: Inspector File 8/23/2012	Inspector Notations Pertinent to Upcoming Inspection: NPDES	

ADDITIONAL COMMENTS:



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

December 31, 2013

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West County Road 250 North
West Lafayette, Indiana 47906

Dear Mr. Lods:

Re: Inspection Summary/ Violation Letter
Howard County Utilities, Inc. WWTP
NPDES Permit No. IN0063754
Russiaville, Howard 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: December 17, 2013
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

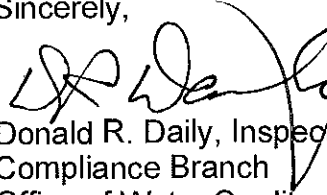
The following concerns were noted:

1. Facility/Site was rated unsatisfactory for not having the treatment plant alarm system in working order to monitor the treatment plant to alert operators of equipment failure during hours when no attendant is on site. Part II. B. 1. b. of the permit requires that the facility be operated in a manner which will minimize discharges of excessive pollutants. An adequate alarm system is necessary to alert operators of equipment failure during hours when no attendant is on site.

(OVER)

Within 30 days of receipt of this letter, a written detailed response documenting correction of each 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 a referral to Office of Water Quality's Enforcement Section. Please direct your response to this letter and any questions to Aaron Deeter at 317-691-1915 or by email to ADeeter@idem.IN.gov. A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records. Thank you for your attention to this matter.

Sincerely,



Donald R. Daily, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0063754	Facility Type: Mixed Ownership	Facility Classification: Minor	TEMPO AI ID II
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Date(s) of Inspection: December 17, 2013

Type of Inspection: Compliance Evaluation Inspection

Name and Location of Facility Inspected: Howard County Utilities, Inc. WWTP	Receiving Waters: Wildcat Creek	Permit Expiration Date: 3/31/2016
Russiaville IN 46979 County: Howard		Design Flow: 0.20MGD

On Site Representative(s):			
First Name	Last Name	Title	Phone
Doug	Whitman	Cert. Operator	317-331-0511
Eric	Klopfenstein	Maintenance	765-463-3856

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

Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:
Doug Whitman	13968	IV	7-1-13	6-30-15	dougwhitman83@hotmail.com

Responsible Official: Mr. Scott Lods, President 3350 West County Road 250 North West Lafayette, Indiana 47906	Permittee:	Howard County Utilities, Inc.	
	Email:	asu-inc@hotmail.com	
	Phone:	765-463-3856	Contacted?
	Fax:		No

INSPECTION FINDINGS

- No violations were discovered with respect to the particular items observed during 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)

N	Receiving Waters	U	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent Appearance	S	Operations	S	Flow Measurement	N	Pretreatment
S	Permit	S	Maintenance	S	Laboratory	S	Effluent Limits Compliance
S	CSO/SSO (Sewer Overflow)	N	Sludge	S	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

Receiving Waters:
N 1. The receiving stream is visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.

Comments:
The receiving stream was not observed due to the steep walk through deep snow drifts between the plant and outfall.

Effluent Appearance:
S 1. Treated effluent is free of excessive solids, floating debris, oil, scum, or billowy foam.

Comments:
The effluent was observed at the final flow meter weir and it was clear and free of color at the time of the inspection.

Permit:
N 1. A permit renewal application was submitted to IDEM at least 180 days prior to the expiration date.
S 2. The facility description, including the receiving waters, is complete and accurate.
N 3. The permit has been properly transferred.

Comments:

The facility has a valid permit and the facility description, including units of treatment and receiving stream, is accurate.

CSO/SSO:

- N 1. CSO structures are adequately monitored and maintained.
- S 2. The facility has had no unauthorized sewer overflow events in the past 12 months.
- N 3. SSO and dry weather CSO discharges have been properly reported.
- N 4. Any adverse impacts from SSO and CSO discharges have been properly mitigated.

Comments:

Facility's collection system is comprised of 100% separated sanitary sewers by design with no overflow or bypass points and have not reported any SSO events in the last twelve months.

Facility/Site:

- S 1. The facility has standby power or equivalent provision.
- U 2. An adequate alarm or notification system for power or equipment failure is available for the treatment facility.
- S 3. Safe and adequate access is provided for inspection of all treatment units and outfalls.
- 4. List any safety concerns noted during the inspection in the box below:

Comments:

Facility/Site was rated unsatisfactory for not having the treatment plant alarm system in working order to monitor the treatment plant to alert operators of equipment failure during hours when no attendant is on site. Part II. B. 1. b. of the permit requires that the facility be operated in a manner which will minimize discharges of excessive pollutants. An adequate alarm system is necessary to alert operators of equipment failure during hours when no attendant is on site.

Operations:

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

Comments:

All units of treatment appear to be operating efficiently at the time of inspection. There was good mixing and color noted in the EQ tank and in the aeration tank. The two secondary clarifiers were clear and free of algae with a few sludge balls on the surface, but the clarifiers both appeared to be operating efficiently. The UV system was dismantled and stored in building with the UV channel being clean and clear at the time of inspection. Sludge wasting is adequate and determined by the certified operator.

Maintenance:

- S 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- S 2. Facility maintenance activities appear adequate.
- S 3. Lift station procedures include:
 - a. Adequate alarm or notification system for equipment failure.
 - b. Adequate inspections, cleaning, and maintenance activities.
 - c. Adequate documentation of all procedures
- N 4. Collection system maintenance activities appear adequate.

Comments:

Maintenance records for treatment facility reviewed during inspection. Maintenance program is well implemented and executed. Maintenance activities, such as cleaning and repairs, are documented on operator's daily log and PM/Repair sheet with all activities appearing adequate.

Sludge:

N 1. Sludges, screenings, and slurries are handled and disposed of properly.

Comments:

The facility has not had to dispose of sludge since starting new plant in 2012. The facility has a large capacity digester that holds approximately 250,000 gallons and was 1/3 full at the time of inspection.

Self-Monitoring:

S 1. Samples are taken at pre-designated locations and are representative.

S 2. Flow-proportioned samples are obtained where needed.

S 3. The facility conducts sampling of all waste streams, including type and frequency, as required in the permit.

S 4. Sample collection procedures, including automatic sampling, include:

- a. Samples are refrigerated during compositing.
- b. Proper preservation techniques are used.
- c. Containers and holding times conform to 40 CFR 136.3.

S 5. Sample documentation is adequate and includes:

- a. Date, time, and location of sampling.
- b. Name of individual performing sampling.
- c. Instantaneous flow for flow-weighted aliquots.

N 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements are being met.

Comments:

The Self-Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. Raw, intermediate unit treatment and final sampling locations is representative of the waste stream. Final effluent samples are accurately flow proportioned composites were required by permit.

Flow Measurement:

S 1. Flow is properly measured as required by the permit.

S 2. Flow charts and calibration records are available for review.

S 3. Effluent flow is used in calculating effluent loadings.

Comments:

The facility's flow measurement program, including all documentation, is adequate and representative. The effluent flow meter was last calibrated in May 2013 by B.L. Anderson.

Laboratory:

1. The following laboratory records were reviewed:

Flow Proportion Data	CBOD Bench Sheets	TSS Bench Sheets
Ammonia Bench Sheets	pH/DO Bench Sheets	E. coli Bench Sheets
Flow/Wasting Log	Ammonia Calibration Log	DO Calibration Log
pH Calibration Log	Daily Operators Log	

S 2. The laboratory practices and protocol reviewed were adequate, including:

- a. Written laboratory QA/QC manual.
- b. Chain-of-Custody procedures followed.
- c. Samples are properly stored.
- d. Approved analytical methods are used.
- e. Calibration and maintenance of instruments is adequate.
- f. QA/QC procedures are adequate.
- g. Dates of analyses.
- h. Name of person performing analyses.

Contract Lab Information

Richard Kain Lab/Chrysler Plant Lab

Jonesboro, IN/Kokomo, IN

Richard Kain/Doug Whitman

NA/317-331-0511

Comments:

Analyses for pH and DO are performed on-site with E. Coli and CBOD being performed at the Richard Kain lab with all other parameters of the permit being performed at the operators full time job's lab (Chrysler). The bench sheets reviewed from both labs during the inspection appeared to be accurate and complete. The actual contract labs were not evaluated during the inspection, but review of the bench sheets and calibration logs was enough to rate labs as satisfactory. The bench sheets observed documented person performing analysis and sampling, QA/QC procedures (blanks and duplicates), dates and times of analysis and analytical methods.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of November 2012 to October 2013 were reviewed as part of the inspection.

- S 1. All facility records for the period including the previous three years were available for review.
- S 2. DMRs, MROs/MMRs, and CSODMRs are completed properly and accurately including:
 - a. "No Ex" column is accurate.
 - b. Signatory requirements are met.
 - c. Reports are prepared by or under the direction of a certified operator.

Comments:

The requested records were available and appear complete and accurate.

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 has no compliance schedules or enforcement actions at this time.

Pretreatment:

- N 1. The facility operates without significant interference from industrial or other sources of toxic substances.
- N 2. For both Delegated and Non-Delegated pretreatment programs:
 - a. Industrial or commercial dischargers are regulated as required.
 - b. The permittee enforces the Sewer Use Ordinance and follows the Enforcement Guide.
 - c. The permittee submitted its annual pretreatment report to IDEM by April 1.
- N 3. Non-Delegated pretreatment programs have:
 - a. Developed or reevaluated the Sewer Use Ordinance and submitted it to IDEM.
 - b. Developed or reevaluated the Enforcement Response Guide and submitted it to IDEM.
- N 4. Pretreatment records were adequate and include:
 - a. Inventory of Industrial Waste Contributors.
 - b. Monitoring data.
 - c. Inspection Reports.
 - d. Compliance status records.
 - e. Enforcement actions.

Comments:

Facility has no industrial sources.

Effluent Limits Compliance:

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

DMRs for the period of November 2012 to October 2013 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

N 3. Bypass and Noncompliance reporting.

Comments:

A records review during the inspection indicated no effluent violations have been reported during the period reviewed.

IDEM REPRESENTATIVE

Inspector Name:
Aaron Deeter

Email:
ADeeter@idem.IN.gov

Phone Number:
317-691-1915

IDEM MANAGER REVIEW

IDEM Manager:

Date:

Don Daily

12-23-13

Inspection Photographs



MAINTENANCE RECORD
ASSIGNED TO SERVICE PERSONNEL
EQUIPMENT DESCRIPTION: *Pressure Washers*

DATE: *12-13-13* TIME: *10:00 AM*

DESCRIPTION OF SERVICE REQUESTED

REQUESTED BY:

DESCRIPTION OF SERVICE COMPLETED
*Change the filter screen 25. Screen + motor
✓ Wash all clean & clear in 30 minutes 112 sheets
4.1 has 2 take up readings at site*

COMPLETED BY: *[Signature]*

IF SERVICE CANNOT BE COMPLETED WHY

NOT COMPLETED BY

CSW-WYFORMAINTRQ DOC

Facility:
Howard County Utilities, Inc. WWTP

Photographer:
Aaron Deeter

Date: 12/17/2013 Time:

Others Present:

Location/Description:
Gate and snow covered path to receiving stream

Facility:
Howard County Utilities, Inc. WWTP

Photographer:
Aaron Deeter

Date: 12/17/2013 Time:

Others Present:

Location/Description:
main lift station and only lift station at treatment plant

Facility:
Howard County Utilities, Inc. WWTP

Photographer:
Aaron Deeter

Date: 12/17/2013 Time:

Others Present:

Location/Description:
preventative maintenance and repair log sheet

Howard County Utilities, Inc.

3350 West 250 North
West Lafayette, IN 47906
Ph. 765-463-4449
Fax 765-463-3855
DO#14102

30-Jan-14

To: Mr. Donald R. Daily, Inspections Section Chief
Indiana Department of Environmental Management
Office of Water Quality/Compliance Branch
100 N Senate Avenue, Room IGCN 1255
Indianapolis, IN 46204

From : Scott L. Lods
President
Howard County Utilities, Inc
3350 W 250 N
West Lafayette, IN 47906


Re: Response to IDEM's 31-Dec-14 Inspection Summary
Howard County Utilities, Inc.
NPDES Permit No. IN0063754
678 550 W
Russiaville, IN Howard County

Mr. Daily,

This letter is being submitted in response to IDEM's 31-Dec-13 Inspection Summary. The existing Howard County Utility Waste Water Treatment Plants main pump control panel is set up with an High Tide Technologies Model HTT-3000 alarm monitoring system as shown in attached electric schematic having number E10097-1.

Howard County Utilities will have the telemetry alarm system operating by 28-Feb-14. Thank you and please notify us when you would like to have a follow up inspection.

Sincerely,



Scott L. Lods
President
Howard County Utilities, Inc.

HTT-3000
ALARM MONITORING
SYSTEM

LI	N	ALARM CONTACTS
	156 C	CR7 INF PUMP 1 FAULT
	157 T1	
	158 C	CR8 INF PUMP 2 FAULT
	159 C	CR9 INF PUMP 3 FAULT
	160 C	
	161 C	OL1 EC BLOWER OL
	162 C	OL2 EC PUMP 1 OL
	163 C	OL3 EC PUMP 2 OL
	164 C	OL4 MAIN AER BLOWER 1 OL
	165 C	OL5 MAIN AER BLOWER 2 OL
	166 C	OL6 MAIN AER BLOWER 3 OL
	167 C	OL7 SLUDGE BLOWER 1 OL
	168 C	OL8 SLUDGE BLOWER 2 OL

DIGITAL IN

121 +	CR1 INFLUENT PUMP 1 RUN
122 -	
123 +	CR2 INFLUENT PUMP 2 RUN
124 -	
125 +	CR3 INFLUENT PUMP 3 RUN
126 -	
127 +	MSZ INFLUENT PUMP 3 RUN
128 -	
129 +	MSJ INFLUENT PUMP 3 RUN
130 -	

4-20 MA FROM LC1 +
EC TANK LEVEL

4-20 MA FROM LC2 +
INFLUENT TANK LEVEL

72" ALARM LIGHT

HORN

SILENCE

72"

12"

ENCLOSURE DOOR

ENCLOSURE DOOR

NEMA 12
PAINTED STEEL

ALARM CONTACTS



AS BUILT

REVISION DATES	WIRING CODE	SIZE	COLOR
A	480 POWER	#1	BLACK
B	120V NEUTRAL	#14	WHITE
C	120V CONTROL	#16	RED
D	GROUND	#14	GREEN
E	DRY CONTACTS	#18	YELLOW/RED
F			
G			
H			

QUALITY CONTROLS, INC.
3111 CHURCH STREET CINCINNATI, OHIO 45244 • (513) 272-2000

GREEN ACRES MAIN
PUMP CONTROL PANEL

WOL: 480 PHASE 3 HERTZ 60 DATE: 3/3/10
DNG BY: BWM APPROVED BY: JOE F. 10-97
OWNER: BEST ELECTRIC

Howard County Utilities, Inc.

3350 West 250 North
West Lafayette, IN 47906
Ph. 765-463-4449
Fax 765-463-3855
asu-inc@hotmail.com

DO# 14065

Date: 20 February, 2014

To: Mr. Donald R. Daily, Inspection Section Chief
Indiana Department of Environmental Management
Office of Water Quality/Compliance Branch
100 N. Senate Avenue, Rm. IGCN 1255
Indianapolis, IN 46204

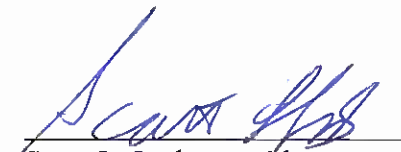
From: Scott L. Lods
President
Howard County Utilities, Inc.
3350 W 250 N
West Lafayette, IN 47906

Re: Response to IDEM's 31-Dec-13 Inspection Summary
Howard County Utilities, Inc. W.W.T.P.
NPDES Permit # IN0063754
678 S 950 W
Russiaville, IN, Howard County

Mr. Daily:

This is to inform you that the alarm communication system at the Howard County Utility's
Waste Water Treatment Plant is activated and is now fully operational.

Sincerely,



Scott L. Lods, President
Howard County Utilities, Inc.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

7/28/2015

Via Email to: asu-inc@hotmail.com

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Dear Mr. Lods:

Re: Inspection Summary Letter
Howard County Utilities, Inc. WWTP
NPDES Permit No. IN0063754
Russiaville, Howard 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: July 21, 2015
Type of Inspection: Reconnaissance Inspection
Inspection Results: Conditions evaluated were found to be satisfactory at the time of the inspection.

IDEM recommends the permittee begin the process of registering for NetDMR. Information on NetDMR can be obtained at <http://www.in.gov/idem/cleanwater/2422.htm>.

A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Aaron Deeter at 317-691-1915 or by email to ADEETER@idem.IN.gov.

Sincerely,

Bridget S. Murphy, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0063754		Facility Type: Mixed Ownership		Facility Classification: Minor		TEMPO AI ID II	
Date(s) of Inspection: July 21, 2015							
Type of Inspection: Reconnaissance Inspection							
Name and Location of Facility Inspected: Howard County Utilities, Inc. WWTP 678 South 950 West Russiaville 46979				County: Howard		Receiving Waters: Wildcat Creek	
						Permit Expiration Date: 3/31/2016	
						Design Flow: 0.200MGD	
On Site Representative(s): First Name Last Name Title Email Phone Doug Whitman Certified Operator dougwhitman83@hotmail.com 317-331-0511							
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator: Doug Whitman		Number: 13968	Class: IV	Effective Date: 7-1-15	Expiration Date: 6-30-17	Email: dougwhitman83@hotmail.com	
Responsible Official: Mr. Scott Lods, President 3350 West 250 North West Lafayette, Indiana 47906				Permittee: Howard County Utilities, Inc. Email: asu-inc@hotmail.com Phone: 765-463-3856 Fax:		Contacted? No	
INSPECTION FINDINGS							
<input checked="" type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Potential problems were discovered or observed. (3) <input type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
AREAS EVALUATED DURING INSPECTION							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
N	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent Appearance	S	Operation	S	Flow Measurement	N	Pretreatment
S	Permit	N	Maintenance	N	Laboratory	S	Effluent Limits Compliance
N	CSO/SSO (Sewer Overflow)	N	Sludge	S	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
IDEM recommends the permittee begin the process of registering for NetDMR. Information on NetDMR can be obtained at http://www.in.gov/idem/cleanwater/2422.htm .							
Receiving Waters:							
Comments: The receiving stream was observed from a distance at the time of inspection and could not be observed for any adverse effect from the facility's discharge due to it being still slightly high due to recent wet weather.							
Effluent Appearance:							
Comments: The effluent was observed at the final flow meter weir and was clear and free of color at the time of the inspection.							
Permit:							
Comments: The facility has a valid permit and the facility description, including units of treatment and receiving stream, is accurate. The current permit expires within the next year. The facility will need to submit a permit renewal application, at a minimum, 180 days prior to the expiration date.							

Facility/Site:

Comments:

The facility grounds are well maintained and access to the units of treatment and entire facility was adequate. The facility has an onsite generator that is tested weekly for its readiness during power outages. The units of treatment at the sewage plant are all monitored by an autodialer system that contacts operator when problems occur. The last inspection on 12-17-13 noted the facility had an inadequate alarm system, so an autodialer system was installed since last inspection.

Operation:

Comments:

All units of treatment appeared to be operating efficiently at the time of inspection. The influent raw grinder was in service and appeared to be working properly. The EQ had good color and mixing, but was high and at its limit due to recent wet weather at the time of the inspection. There was good mixing and color noted in both aeration tanks. The two secondary clarifiers were clear and free of solids and the clarifiers appeared to be operating efficiently. The UV system is in service and appeared to be operating correctly. Sludge wasting appeared to be adequate and is determined by the certified operator.

Self-Monitoring:

Comments:

The Self-Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. Raw, intermediate unit treatment and final sampling locations are representative of the waste stream sampled. Final effluent samples are accurately flow proportioned composites where required by permit.

Flow Measurement:

Comments:

The effluent flow meter was last calibrated in June 2015 by B.L. Anderson.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of January 2015 to May 2015 were reviewed as part of the inspection.

Comments:

The requested records were available and appear complete and accurate.

Effluent Limits Compliance:

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

DMRs for the period of January 2015 to May 2015 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

A records review during the inspection indicated no effluent violations have been reported during the period reviewed.

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Aaron Deeter	ADeeter@idem.IN.gov	317-691-1915

IDEM MANAGER REVIEW

IDEM Manager:	Date:
Andy Schmidt	7/24/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

9/12/2016

Via Email to: asu-inc@hotmail.com

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Dear Mr. Lods:

Re: Inspection Summary Letter
Howard County Utilities Incorporated WWTP
NPDES Permit No. IN0063754
Russiaville, Howard 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 24, 2016
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Potential problems were discovered or observed.

A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Aaron Deeter at 317-691-1915 or by email to adeeter@idem.IN.gov.

Sincerely,

A handwritten signature in black ink that reads "Bridget S. Murphy".

Bridget S. Murphy, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0063754		Facility Type: Mixed Ownership		Facility Classification: Minor		TEMPO AI ID 105678	
Date(s) of Inspection: August 24, 2016							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: Howard County Utilities Incorporated WWTP 678 S CR 950 W Russiaville IN 46979				Receiving Waters: Wildcat Creek		Permit Expiration Date: 3/31/2021	
County: Howard						Design Flow: 0.200MGD	
On Site Representative(s): First Name Last Name Title Email Phone Doug Whittman Contract Certified Operator dougwittman83@hotmail.com 317-331-0511							
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator: Doug Whittman		Number: 13968	Class: IV	Effective Date: 7-1-15	Expiration Date: 6-30-17	Email: dougwhittman83@hotmail.com	
Responsible Official: Mr. Scott Lods, President 3350 West 250 North West Lafayette, Indiana 47906				Permittee: Howard County Utilities, Inc. Email: asu-inc@hotmail.com Phone: 765-463-3856 Fax:		Contacted? No	
INSPECTION FINDINGS							
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input checked="" type="radio"/> Potential problems were discovered or observed. (3) <input type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
AREAS EVALUATED DURING INSPECTION							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent Appearance	S	Operation	S	Flow Measurement	N	Pretreatment
S	Permit	M	Maintenance	S	Laboratory	S	Effluent Limits Compliance
S	CSO/SSO (Sewer Overflow)	N	Sludge	S	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
Receiving Waters:							
S 1. The receiving stream is visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.							
Comments: The receiving stream was observed at the outfall structure and was free of notable foam, algae, sheen, or solids.							
Effluent Appearance:							
S 1. Treated effluent is free of excessive solids, floating debris, oil, scum, or billowy foam.							
Comments: The effluent was observed at the final flow meter and was clear and free of color at the time of the inspection.							
Permit:							
S 1. Does 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 are accurately described in permit.							
N 4. The permit has been properly transferred if there is a new owner.							

Comments:

The facility has a valid permit and the facility description and receiving stream is accurate. A copy of the permit was available for review at the time of inspection.

CSO/SSO:

- N 1. CSO's are adequately monitored and maintained.
- S 2. Evaluation of maintenance-related (clogged or blocked lines) overflow events in last 12 months.
- S 2. Evaluation of hydraulic (I&I) overflow events in last 12 months.
- N 3. Facility has met SSO and dry weather CSO reporting requirements
- N 4. Any adverse impacts from SSO and CSO events have been properly mitigated.

Comments:

Facility's collection system is comprised of 100% separated sanitary sewers by design with no overflow or bypass points and have not reported any SSO events in the last twelve months.

Facility/Site:

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

Comments:

The facility grounds are well maintained and access to the units of treatment and to the outfall was adequate. The facility has an onsite generator that is automatically tested for a 15minutes every Tuesday for its readiness during power outages. The units of treatment and the lift station at the treatment plant are all monitored by an auto-dialer system that contacts facility personnel when problems occur. The auto-dialer log sheet noted the last time the auto dialer was checked for proper operation was 2-8-16, but the on-site rep noted that the maintenance person calls the auto-dialer each Monday to verify that the system is properly operating.

Operation:

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

Comments:

All units of treatment appeared to be operating efficiently at the time of inspection. Good mixing and color was noted in both the EQ tank and in the aeration tank. The two secondary clarifiers were clear and free of algae with slight popping sludge on the surface of the south clarifier, but both clarifiers appeared to be operating efficiently. The UV system was in service and appeared to be operating correctly even with one out of the five banks of bulbs out of service. Sludge wasting appeared to be adequate at the time of the inspection.

Maintenance:

- M 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- M 2. Facility maintenance activities appear adequate.
- S 3. Lift stations are adequately inspected, cleaned, and maintained, with adequate documentation of activities.
- M 4. Collection system maintenance activities appear adequate.

Comments:

Maintenance was rated as **marginal** due to several pieces of equipment being out of service at the time of inspection. The UV system had one out of the five banks of bulbs out of service due to the facility waiting for parts to arrive to fix bank of bulbs. The facility had one out of the five blowers out of service due to a bad blower motor. The facility had a new motor ready to be put in service at the time of the inspection. The facility also had one of the two EQ pumps out of service due to mechanical failure. The facility has a new pump on order and will replace bad pump when new one arrives. Maintenance was also rated as marginal due to the facility still having inflow and infiltration (I/I) in the sanitary collection system. A review of the facility's MROs showed that the facility was

above 100% of its plant capability in three out of the twelve months of MROs reviewed. The facility needs to keep identifying possible sources of I/I in the sanitary collection system and eliminate them from the system. Also the facility needs to make sure they keep their preventative and repair maintenance records up to date. A review of the maintenance log book noted the last time any maintenance or repairs were performed was on February 9th, 2016.

Sludge:

N 1. Sludges, screenings, and slurries are handled and disposed of properly.

Comments:

Sludge Disposal was not rated due to the facility not having to dispose of any sludge, screenings, or slurries since the last inspection.

Self-Monitoring:

S 1. Samples are taken at pre-designated locations and are representative.

S 2. Flow-proportioned samples are obtained where needed.

S 3. The facility conducts sampling of all waste streams, including type and frequency, as required in the permit.

S 4. Sample collection procedures, including automatic sampling, include:

- a. Samples are refrigerated during compositing.
- b. Proper preservation techniques are used.
- c. Containers and holding times conform to 40 CFR 136.3.

S 5. Sample documentation is adequate and includes:

- 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 are being met.

Comments:

The Self-Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. Raw, intermediate unit treatment and final sampling locations are representative of the waste stream sampled. Final effluent samples are accurately flow proportioned composites where required by permit.

Flow Measurement:

S 1. Flow is properly monitored as required by the permit.

S 2. Flow data and calibration records are available for review.

Comments:

The facility's flow measurement program, including all documentation, is adequate and representative. The effluent flow meter was last calibrated on 7-25-16 by B.L. Anderson.

Laboratory:

The following laboratory records were reviewed:

Flow Proportion Log Sheet pH Bench Sheets Contract Lab Reports

S 1. The laboratory practices and protocol reviewed were adequate, including:

- a. Written laboratory QA/QC manual.
- b. Samples are properly stored.
- c. Approved analytical methods are used.
- d. Calibration and maintenance of instruments is adequate.
- e. QA/QC procedures are adequate.
- f. Dates of analyses. (and times where required)
- g. Name of person performing analyses.

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

Contract Lab Information

Richard Kain Lab/Chrysler lab	Jonesboro, IN/Kokomo, IN
Richard Kain/Doug Whitman	317-331-0511

Comments:

Analyses for pH is performed on-site with all other parameters of the permit being performed at the contract labs. The parameters of *E. Coli* and CBOD are being performed at the Richard Kain lab with all other parameters of the permit being performed at the operators full time job's lab (Chrysler Transmission Plant). Reviewed all applicable bench sheets and contract reports on site and all appeared to be accurate and complete. The actual contract labs were not evaluated during the inspection, but review of the bench sheets and contract reports was enough to rate lab as satisfactory. The bench sheets observed documented person performing analysis and sampling, QA/QC procedures (blanks and duplicates), dates and times of analysis and analytical methods. Calibration records for laboratory equipment and temperature monitoring are recorded on bench sheets and QA/QC is adequate.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of July 2015 to June 2016 were reviewed as part of the inspection.

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

Comments:

The requested records were available and appear complete and accurate. The facility has been reporting electronically each month with NetDMR since May 2016.

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:

There is no Compliance Schedule in the current permit, and there is no Agreed 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 are regulated as required.
 - b. The permittee enforces the Sewer Use Ordinance (SOU) and the Enforcement Response Plan (ERP).
 - c. The permittee submitted its annual pretreatment report to IDEM by April 1.
- N 3. Non-Delegated pretreatment programs have:
 - a. Developed the Sewer Use Ordinance and submitted it to IDEM.
 - b. Developed the Enforcement Response Plan and submitted it to IDEM.
 - c. The permittee submitted sludge monitoring data (Cd, Cu, Pb, Hg, Mo, Ni, Zn) twice per year to IDEM's Pretreatment Group.
- N 4. Pretreatment records and procedures were adequate and include:
 - a. Inventory of Industrial Waste Contributors/Industrial Survey.
 - b. Keeping records of all Industrial User (IU) self-monitoring data.
 - c. Conducting compliance monitoring at all Significant Industrial Users (SIUs) for all parameters in the industry's permit.
 - d. Conducting annual inspections at all SIUs and documenting them with inspection reports.
 - e. For any IU in noncompliance in the past year, the permittee has taken enforcement actions.
- N 5. 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 July 2015 to June 2016 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

A records review during the inspection indicated no effluent violations have been reported during the period reviewed.

IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Aaron Deeter

adeeter@idem.IN.gov

317-691-1915

IDEM MANAGER REVIEW

IDEM Manager:

Date:

Bridget S. Murphy

9/3/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

July 26, 2018

Via Email to: asu-inc@hotmail.com

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Dear Mr. Lods:

Re: Inspection Summary/ Noncompliance Letter
Howard County Utilities, Inc. WWTP
NPDES Permit No. IN0063754
Russiaville, Howard 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: July 18, 2018
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

Maintenance was rated as unsatisfactory due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system which hydraulically overloads the wastewater treatment plant's rated capacity. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

A review of the facility's MROs revealed that the facility was above 90% of its plant capacity in six out of the twelve months and above 100% in four of those months of MROs reviewed. The facility averaged 91% of its plant capacity in 2017 and has an averaged of 89% for the first five months 2018. **The facility needs to identify possible sources of I/I in the sanitary collection system and eliminate them from the system.**

Maintenance was rated as **marginal** due to several pieces of equipment being out of service or needing repaired at the time of inspection. At the time of the inspection it was noted that the facility had three out of the five blowers out of service due to mechanical repairs. The blowers out of service appeared to be in the process of being repaired. Also the air supply lines to both air lift return pumps appeared to have a small air leak in each clarifier. **You need to look into repairing the air leaks before they become major air leaks.**

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 the attention of Bridget S. Murphy, at our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Aaron Deeter at 317-691-1915 or by email to adeeter@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,



Bridget S. Murphy, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0063754		Facility Type: Mixed Ownership		Facility Classification: Minor		TEMPO AI ID 105678	
Date(s) of Inspection: July 18, 2018							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: Howard County Utilities, Inc. WWTP 678 S CR 950 W Russiaville IN 46979				Receiving Waters: Wildcat Creek		Permit Expiration Date: 3/31/2021	
County: Howard						Design Flow: 0.200MGD	
On Site Representative(s): First Name Last Name Title Email Phone Doug Whitman Contract Certified Operator dougwhitman83@hotmail.com 317-331-0511							
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator: Doug Whitman		Number: 13968	Class: IV	Effective Date: 7-1-17	Expiration Date: 6-30-19	Email: dougwhitman83@hotmail.com	
Responsible Official: Mr. Scott Lods, President 3350 West 250 North West Lafayette, Indiana 47906				Permittee: Howard County Utilities, Inc. Email: asu-inc@hotmail.com Phone: 765-463-3856 Fax:		Contacted? No	
INSPECTION FINDINGS							
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Potential problems were discovered or observed. (3) <input checked="" type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
AREAS EVALUATED DURING INSPECTION							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent Appearance	S	Operation	S	Flow Measurement	N	Pretreatment
S	Permit	U	Maintenance	S	Laboratory	S	Effluent Limits Compliance
S	Collection System	N	Sludge	S	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 observed at the outfall structure and was free of notable foam, algae, sheen, or solids.							
Effluent Appearance:							
S 1. Treated effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.							
Comments: The effluent was observed at the final flow meter and outfall structure and it 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 were accurately described in permit.							

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

Comments:

The facility has a valid permit and the facility description and receiving stream is accurate. A copy of the permit was available for review at the time of inspection.

Collection System:

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

S 2. Evaluation of maintenance-related (clogged or blocked lines) overflow events in last 12 months.

S 2. Evaluation of hydraulic (I&I) overflow events in last 12 months.

N 3. Facility has met SSO and dry weather CSO reporting requirements

N 4. Any adverse impacts from SSO and CSO events have been properly mitigated.

Comments:

Facility's collection system is comprised of 100% separate sanitary sewers by design with no overflow or bypass points. There have not been any reported SSO events in the last twelve 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.

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

5. List any safety concerns:

Comments:

The facility grounds are well maintained and access to the units of treatment was adequate. The outfall was barely accessible due to the tall weeds and woody vegetation, so the facility needs to maintain a clearer path for future inspections. The facility has an onsite generator that is automatically tested every Tuesday for its readiness during power outages. The units of treatment and the lift station at the treatment plant are all monitored by an auto-dialer system that contacts facility personnel when problems occur.

Operation:

S 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.

S 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:

All units of treatment appeared to be operating efficiently at the time of inspection. Good mixing and color was noted in both the EQ tank and in the aeration tank. The two secondary clarifiers were clear and free of algae with slight duck weed and debris on the surface of both clarifiers, but they both appeared to be operating efficiently. The UV system was in service and appeared to be operating correctly at the time of the inspection. Sludge wasting appeared to be adequate at the time of the inspection.

Maintenance:

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

M 2. Facility maintenance activities appeared to be adequate.

S 3. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.

U 4. Collection system maintenance activities appeared to be adequate.

Comments:

Maintenance was rated as **unsatisfactory** due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system, which hydraulically overloads the wastewater treatment plant. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive

pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

A review of the facility's MROs revealed that the facility was above 90% of its plant capacity in six out of the twelve months and above 100% in four of those months of MROs reviewed. The facility averaged 91% of its plant capacity in 2017 and has an averaged of 89% for the first five months 2018. The facility needs to identify possible sources of I/I in the sanitary collection system and eliminate them from the system.

Maintenance was rated as **marginal** due to several pieces of equipment being out of service or needing to be repaired at the time of inspection. At the time of the inspection it was noted that facility had three out of the five blowers out of service due to mechanical repairs. The blowers out of service appeared to be in the process of being repaired. Also the air supply lines to both air lift return pumps appeared to have a small air leak in each clarifier. **The facility needs to look into repairing the air leaks before they become major air leaks.**

Sludge:

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

Comments:

Sludge Disposal was not rated due to the facility not having to dispose of any sludge, screenings, or slurries since the last inspection.

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 raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. Raw, intermediate unit treatment and final sampling locations are representative of the waste stream sampled. Final effluent samples are accurately flow proportioned composites where required by 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, is adequate and representative. The effluent flow meter was last calibrated on 3-26-18 by B.L. Anderson.

Laboratory:

The following laboratory records were reviewed:

D. O. Bench Sheets	Flow Proportion Data Sheet	CBOD Bench Sheets
TSS Bench Sheets	Ammonia Bench Sheets	pH Bench Sheets
E. coli Bench Sheets	pH/DO Calibration Log	

S 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

Richard Kain Lab/Chrysler lab

Jonesboro, IN/Kokomo, IN

Comments:

Analyses for pH is performed on-site with all other parameters of the permit being performed at the contract lab. The parameters of *E. Coli* and CBOD are being performed at the Richard Kain lab with all other parameters of the permit being performed at the operators full time job's lab (Chrysler Transmission Plant). All applicable bench sheets and contract reports on site were reviewed, and all appeared to be accurate and complete. The actual contract labs were not evaluated during the inspection, but review of the bench sheets and contract reports was enough to rate lab as satisfactory. The bench sheets observed documented the person performing analysis and sampling, QA/QC procedures (blanks and duplicates), and dates and times of analysis.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of June 2017 to May 2018 were reviewed as part of the inspection.

S 1. All facility records for the period including the previous three years were available for review.

S 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 requested records were available and appear complete and accurate. The facility has been reporting electronically each month with NetDMR since May 2016.

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:

There is no Schedule of Compliance in the current permit, and there is no Agreed 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 permittee 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 June 2017 to May 2018 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

A records review during the inspection indicated no effluent violations have been reported during the period reviewed.

IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Aaron Deeter

adeeter@idem.IN.gov

317-691-1915

IDEM MANAGER REVIEW

IDEM Manager:

Date:

Bridget S. Murphy

7/23/2018



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

August 28, 2018

Via Email to: asu-inc@hotmail.com
Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 W 250 N
West Lafayette, Indiana 47906

Dear Mr. Lods:

Re: No Response Letter
Howard County Utilities, Inc. WWTP
NPDES Permit No. IN0063754
Russiaville, Howard County

An inspection of the above-referenced facility or location was conducted on July 18th, 2018 by a representative of the Indiana Department of Environmental Management pursuant to IC 13-18-3-9.

Your facility was sent a Non-Compliance Letter concerning issues observed during the above noted inspection. The letter and inspection report are enclosed. A written detailed response documenting the corrections required in the inspection was due thirty (30) days from receipt of the Non-Compliance Letter and to date, no response has been received.

Within 20 days of receipt of this letter, a written detailed response to our July 26th, 2018 letter must be submitted to this office. Please direct your response to this letter to the attention of Bridget S. Murphy, at our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Aaron Deeter at 317-691-1915 or by email to adeeter@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Bridget S. Murphy, Section Chief
Wastewater Inspection Section
Compliance Branch
Office of Water Quality

CC:
Aaron Deeter, Field Inspector



Indiana Department of Environmental Management

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

July 26, 2018

Via Email to: asu-inc@hotmail.com

Mr. Scott Lods, President
Howard County Utilities, Inc.
3350 West 250 North
West Lafayette, Indiana 47906

Dear Mr. Lods:

Re: Inspection Summary/ Noncompliance Letter
Howard County Utilities, Inc. WWTP
NPDES Permit No. IN0063754
Russiaville, Howard 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: July 18, 2018
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

Maintenance was rated as unsatisfactory due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system which hydraulically overloads the wastewater treatment plant's rated capacity. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

A review of the facility's MROs revealed that the facility was above 90% of its plant capacity in six out of the twelve months and above 100% in four of those months of MROs reviewed. The facility averaged 91% of its plant capacity in 2017 and has an averaged of 89% for the first five months 2018. **The facility needs to identify possible sources of I/I in the sanitary collection system and eliminate them from the system.**

Maintenance was rated as **marginal** due to several pieces of equipment being out of service or needing repaired at the time of inspection. At the time of the inspection it was noted that the facility had three out of the five blowers out of service due to mechanical repairs. The blowers out of service appeared to be in the process of being repaired. Also the air supply lines to both air lift return pumps appeared to have a small air leak in each clarifier. **You need to look into repairing the air leaks before they become major air leaks.**

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 the attention of Bridget S. Murphy, at our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Aaron Deeter at 317-691-1915 or by email to adeeter@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,



Bridget S. Murphy, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0063754		Facility Type: Mixed Ownership		Facility Classification: Minor		TEMPO AI ID 105678	
Date(s) of Inspection: July 18, 2018							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: Howard County Utilities, Inc. WWTP 678 S CR 950 W Russiaville IN 46979				Receiving Waters: Wildcat Creek		Permit Expiration Date: 3/31/2021	
County: Howard						Design Flow: 0.200MGD	
On Site Representative(s): First Name Last Name Title Email Phone Doug Whitman Contract Certified Operator dougwhitman83@hotmail.com 317-331-0511							
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator: Doug Whitman		Number: 13968	Class: IV	Effective Date: 7-1-17	Expiration Date: 6-30-19	Email: dougwhitman83@hotmail.com	
Responsible Official: Mr. Scott Lods, President 3350 West 250 North West Lafayette, Indiana 47906				Permittee: Howard County Utilities, Inc. Email: asu-inc@hotmail.com Phone: 765-463-3856 Fax:		Contacted? No	
INSPECTION FINDINGS							
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Potential problems were discovered or observed. (3) <input checked="" type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
AREAS EVALUATED DURING INSPECTION							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent Appearance	S	Operation	S	Flow Measurement	N	Pretreatment
S	Permit	U	Maintenance	S	Laboratory	S	Effluent Limits Compliance
S	Collection System	N	Sludge	S	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 observed at the outfall structure and was free of notable foam, algae, sheen, or solids.							
Effluent Appearance:							
S 1. Treated effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.							
Comments: The effluent was observed at the final flow meter and outfall structure and it 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 were accurately described in permit.							

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

Comments:

The facility has a valid permit and the facility description and receiving stream is accurate. A copy of the permit was available for review at the time of inspection.

Collection System:

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

S 2. Evaluation of maintenance-related (clogged or blocked lines) overflow events in last 12 months.

S 2. Evaluation of hydraulic (I&I) overflow events in last 12 months.

N 3. Facility has met SSO and dry weather CSO reporting requirements

N 4. Any adverse impacts from SSO and CSO events have been properly mitigated.

Comments:

Facility's collection system is comprised of 100% separate sanitary sewers by design with no overflow or bypass points. There have not been any reported SSO events in the last twelve 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.

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

5. List any safety concerns:

Comments:

The facility grounds are well maintained and access to the units of treatment was adequate. The outfall was barely accessible due to the tall weeds and woody vegetation, so the facility needs to maintain a clearer path for future inspections. The facility has an onsite generator that is automatically tested every Tuesday for its readiness during power outages. The units of treatment and the lift station at the treatment plant are all monitored by an auto-dialer system that contacts facility personnel when problems occur.

Operation:

S 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.

S 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:

All units of treatment appeared to be operating efficiently at the time of inspection. Good mixing and color was noted in both the EQ tank and in the aeration tank. The two secondary clarifiers were clear and free of algae with slight duck weed and debris on the surface of both clarifiers, but they both appeared to be operating efficiently. The UV system was in service and appeared to be operating correctly at the time of the inspection. Sludge wasting appeared to be adequate at the time of the inspection.

Maintenance:

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

M 2. Facility maintenance activities appeared to be adequate.

S 3. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.

U 4. Collection system maintenance activities appeared to be adequate.

Comments:

Maintenance was rated as **unsatisfactory** due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system, which hydraulically overloads the wastewater treatment plant. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive

pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

A review of the facility's MROs revealed that the facility was above 90% of its plant capacity in six out of the twelve months and above 100% in four of those months of MROs reviewed. The facility averaged 91% of its plant capacity in 2017 and has an averaged of 89% for the first five months 2018. The facility needs to identify possible sources of I/I in the sanitary collection system and eliminate them from the system.

Maintenance was rated as **marginal** due to several pieces of equipment being out of service or needing to be repaired at the time of inspection. At the time of the inspection it was noted that facility had three out of the five blowers out of service due to mechanical repairs. The blowers out of service appeared to be in the process of being repaired. Also the air supply lines to both air lift return pumps appeared to have a small air leak in each clarifier. **The facility needs to look into repairing the air leaks before they become major air leaks.**

Sludge:

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

Comments:

Sludge Disposal was not rated due to the facility not having to dispose of any sludge, screenings, or slurries since the last inspection.

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 raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. Raw, intermediate unit treatment and final sampling locations are representative of the waste stream sampled. Final effluent samples are accurately flow proportioned composites where required by 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, is adequate and representative. The effluent flow meter was last calibrated on 3-26-18 by B.L. Anderson.

Laboratory:

The following laboratory records were reviewed:

D. O. Bench Sheets	Flow Proportion Data Sheet	CBOD Bench Sheets
TSS Bench Sheets	Ammonia Bench Sheets	pH Bench Sheets
E. coli Bench Sheets	pH/DO Calibration Log	

S 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

Richard Kain Lab/Chrysler lab

Jonesboro, IN/Kokomo, IN

Comments:

Analyses for pH is performed on-site with all other parameters of the permit being performed at the contract lab. The parameters of *E. Coli* and CBOD are being performed at the Richard Kain lab with all other parameters of the permit being performed at the operators full time job's lab (Chrysler Transmission Plant). All applicable bench sheets and contract reports on site were reviewed, and all appeared to be accurate and complete. The actual contract labs were not evaluated during the inspection, but review of the bench sheets and contract reports was enough to rate lab as satisfactory. The bench sheets observed documented the person performing analysis and sampling, QA/QC procedures (blanks and duplicates), and dates and times of analysis.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of June 2017 to May 2018 were reviewed as part of the inspection.

S 1. All facility records for the period including the previous three years were available for review.

S 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 requested records were available and appear complete and accurate. The facility has been reporting electronically each month with NetDMR since May 2016.

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:

There is no Schedule of Compliance in the current permit, and there is no Agreed 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 permittee 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 June 2017 to May 2018 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

A records review during the inspection indicated no effluent violations have been reported during the period reviewed.

IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Aaron Deeter

adeeter@idem.IN.gov

317-691-1915

IDEM MANAGER REVIEW

IDEM Manager:

Date:

Bridget S. Murphy

7/23/2018

IN 0063754
Tippecanoe Co

09/10/2018

WVViolationResponse@idem.IN.gov

RE: Inspection Summary/Noncompliance Letter
American Suburban Utilities
Green Acres W.W.T.P.
Howard County Utilities, Inc.
West Lafayette, Tippecanoe County, Indiana
NPDES Permit No. IN0063754
Project No. 18-001GA-01

Bridget:

In response to the July 18, 2018 inspection of the Howard County Utilities, Inc. Green Acres Wastewater Treatment Plant, please note that the following responses by Howard County Utilities to the comments listed in IDEM's letter of July 26, 2018.

IDEM COMMENT 1:

Maintenance was rated as unsatisfactory due to the facility experiencing excessive inflow and infiltration (I/I) in the collection system which hydraulically overloads the wastewater treatment plant's rated capacity. This is a violation of Part II. B. 1 of the permit which states, in part, that all waste collection, control, treatment, and disposal facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit. This includes the facility's collection system.

A review of the facility's MROs revealed that the facility was above 90% of its plant capacity in six out of twelve months and above 100% in four of those months of MROs reviewed. The facility averaged 91% of its plant capacity in 2017 and has an average of 89% for the first five months 2018. The facility needs to identify possible sources of I/I in the sanitary collection system and eliminate them from the system.

HCU Response

Howard County Utilities is requesting an opportunity to meet with Ms. Bridget Murphy, Section Chief; Mr. Aaron Deeter, Field Inspector; and any other interested Compliance

Branch Staff to discuss the current Infiltration and Inflow (I/I) situation in the Howard County Collection System.

Please email our office at slods@asucorp.com or call at 765-463-4449 to set up a meeting.

IDEM Comment 2

Maintenance was rated as marginal due to several pieces of equipment being out of service or needing repair at the time of inspection. At the time of the inspection it was noted that the facility had three out of the five blowers out of service due to mechanical repairs. The blowers out of service appeared to be in the process of being repaired. Also, the air supply lines to both air lift return pumps appeared to have a small air leak in each clarifier. You need to look into repairing the air leaks before they become major air leaks.

HCU Response

- a. Currently two (2) of the five (5) aeration blowers are sufficient to operate the Wastewater Treatment Plant. The remaining three (3) blowers had their V-belt drives disconnected so that these blowers can be easily rotated to ensure that their gears and bearings are lubricated as recommended by the blower manufacturer's representative (Power Equipment Company of Terre Haute, Indiana). Any one of these three (3) blowers can be placed on line in less than a day if required.
- b. All the air leaks in the aeration piping including the air lift piping have been repaired.

Thank you and please do not hesitate to contact us if we can be of any additional assistance.

Very truly yours,

Edward Serowka, P.E.





Summary

Parcel ID 34-08-04-400-022.000-023
 Alternate ID
 Property Address 950 W Kokomo
 Sec/Twp/Rng 4/23/2
 Taxing Unit MONROE TOWNSHIP
 Political Township MONROE TOWNSHIP
 Subdivision N/A
 Neighborhood Monroe Township Homesites (1000001-023)
 Zoning N/A
 Building Jurisdiction
 Brief Tax Description PT SE4 4-23-2 33.17 AC
 (Note: Not to be used on legal documents)
 Book/Page N/A
 Acres 33.170
 Class Ag - Vacant lot

Owners

Deeded Owner
 Lods, Scott L
 3350 W 250 N
 West Lafayette, IN 47906

Taxing District

County: Howard
 Township: MONROE TOWNSHIP
 State District: 023 MONROE TOWNSHIP
 Local District: 023
 School Corp: WESTERN
 Neighborhood: 1000001-023 Monroe Township Homesites

Site Description

Topography: Rolling
 Public Utilities: Electricity
 Street or Road: Paved
 Area Quality
 Parcel Acreage: 33.17

Land

Land Type	Soil ID	Act Front.	Eff. Depth	Size	Rate	Adj. Rate	Ext. Value	Infl. %	Value
Tillable Cropland	BS	0	0	0.0900	\$1,560.00	\$1,997.00	\$179.73	\$0.00	\$180.00
Road Right of Way	BS	0	0	0.0100	\$1,560.00	\$1,997.00	\$19.97	(\$100.00)	\$0.00
Woodland	FC	0	0	1.5900	\$1,560.00	\$1,732.00	\$2,753.88	(\$80.00)	\$550.00
Tillable Cropland	FC	0	0	0.5900	\$1,560.00	\$1,732.00	\$1,021.88	\$0.00	\$1,020.00
Tillable Cropland	FSC3	0	0	2.4100	\$1,560.00	\$936.00	\$2,255.76	\$0.00	\$2,260.00
Woodland	FSC3	0	0	3.6700	\$1,560.00	\$936.00	\$3,435.12	(\$80.00)	\$690.00
Tillable Cropland	HEE	0	0	0.4800	\$1,560.00	\$780.00	\$374.40	\$0.00	\$370.00
Woodland	HEE	0	0	3.5300	\$1,560.00	\$780.00	\$2,753.40	(\$80.00)	\$550.00
Tillable Cropland	MMC3	0	0	1.9700	\$1,560.00	\$1,201.00	\$2,365.97	\$0.00	\$2,370.00
Woodland	MMC3	0	0	2.2100	\$1,560.00	\$1,201.00	\$2,654.21	(\$80.00)	\$530.00
Tillable Cropland	OCA	0	0	1.3200	\$1,560.00	\$1,466.00	\$1,935.12	\$0.00	\$1,940.00
Tillable Cropland	OCB2	0	0	4.2000	\$1,560.00	\$1,388.00	\$5,829.60	\$0.00	\$5,830.00
Woodland	OCB2	0	0	0.1400	\$1,560.00	\$1,388.00	\$194.32	(\$80.00)	\$40.00
Woodland	OKA	0	0	0.0600	\$1,560.00	\$1,591.00	\$95.46	(\$80.00)	\$20.00
Tillable Cropland	OKA	0	0	0.2400	\$1,560.00	\$1,591.00	\$381.84	\$0.00	\$380.00
Tillable Cropland	RUB2	0	0	1.1000	\$1,560.00	\$1,529.00	\$1,681.90	\$0.00	\$1,680.00
Woodland	RUB2	0	0	0.6500	\$1,560.00	\$1,529.00	\$993.85	(\$80.00)	\$200.00
Woodland	SH	0	0	8.9100	\$1,560.00	\$1,732.00	\$15,432.12	(\$80.00)	\$3,090.00

Date	New Owner	Doc ID	Book/Page	Sale Price
4/8/2009	Lods, Scott L	V-V		\$174,143.00
10/1/2003	FRAZIER LEWIS V JR MOHR CONSTRUCTION CO INC			\$53,100.00 \$0.00

Transfer History

Transfer #	Date	Type	Instrument	Instr #	Book	Page	From	To
44778	4/8/2009	Change Ownership	Warranty Deed				Frazier, Lewis V Jr	Lods, Scott L
22684	10/1/2003	Combine Property					Frazier, Lewis V Jr	Frazier, Lewis V Jr

Valuation

Assessment Year	2019	2018	2017	2016	2015
Reason	Annual Adjustment	Annual Adjustment	Annual Adjustment	Annual Adjustment	Annual Adjustment
As Of Date	3/21/2019	4/23/2018	5/17/2017	5/18/2016	7/1/2015
Land	\$21,700	\$22,400	\$25,700	\$27,200	\$28,500
Improvement	\$0	\$0	\$0	\$0	\$0
Total	\$21,700	\$22,400	\$25,700	\$27,200	\$28,500

Tax History

All taxes have not been calculated. The amounts showing are an estimate and may not be accurate.

Detail: Tax Year	Type	Category	Description	Amount	Bal Due
2018 Pay 2019	Property Tax Detail	Tax	1st Installment Tax	\$212.59	\$0.00
2018 Pay 2019	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$24.65	\$0.00
2018 Pay 2019	Property Tax Detail	Tax	2nd Installment Tax	\$212.59	\$212.59
2018 Pay 2019	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	\$0.00
2017 Pay 2018	Property Tax Detail	Tax	1st Installment Tax	\$244.92	
2017 Pay 2018	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$24.65	
2017 Pay 2018	Property Tax Detail	Tax	2nd Installment Tax	\$244.92	
2017 Pay 2018	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2016 Pay 2017	Property Tax Detail	Tax	1st Installment Tax	\$253.59	
2016 Pay 2017	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$24.65	
2016 Pay 2017	Property Tax Detail	Tax	2nd Installment Tax	\$253.59	
2016 Pay 2017	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2015 Pay 2016	Property Tax Detail	Tax	1st Installment Tax	\$285.00	
2015 Pay 2016	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$24.65	
2015 Pay 2016	Property Tax Detail	Tax	2nd Installment Tax	\$285.00	
2015 Pay 2016	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2014 Pay 2015	Property Tax Detail	Tax	1st Installment Tax	\$261.30	
2014 Pay 2015	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$24.65	
2014 Pay 2015	Property Tax Detail	Tax	2nd Installment Tax	\$261.30	
2014 Pay 2015	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2013 Pay 2014	Property Tax Detail	Penalty	1st Installment Penalty	\$12.25	
2013 Pay 2014	Property Tax Detail	Tax	1st Installment Tax	\$245.00	
2013 Pay 2014	Special Assessment Detail	Penalty	WATER QUALITY DIST 1st Installment Penalty	\$1.23	
2013 Pay 2014	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$24.65	
2013 Pay 2014	Property Tax Detail	Tax	2nd Installment Tax	\$245.00	
2013 Pay 2014	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	

Total:

Tax Year	Amount	Bal Due
2018 Pay 2019	\$449.83	\$212.59
2017 Pay 2018	\$514.49	
2016 Pay 2017	\$531.83	
2015 Pay 2016	\$594.65	
2014 Pay 2015	\$547.25	
2013 Pay 2014	\$528.13	

If you have had your property combined or have bought or sold only a portion of an existing parcel, please call the Treasurer's Office for accurate tax information.

Payments

Detail: Tax Year	Payment Date	Paid By	Amount
2018 Pay 2019	5/15/2019	Howard County Utilities Inc	\$237.24
2017 Pay 2018	11/15/2018	Howard County Utilities, Inc.	\$244.92
2017 Pay 2018	4/27/2018	Mail Processing by Star Financial	\$269.57
2016 Pay 2017	11/15/2017	Howard County Utilities Inc	\$253.59
2016 Pay 2017	5/5/2017	Howard County Utilities Inc	\$278.24
2015 Pay 2016	11/15/2016	Howard County Utilities	\$285.00
2015 Pay 2016	5/19/2016	Howard County Utilities	\$309.65
2014 Pay 2015	11/4/2015	Howard County Utilities, Inc	\$261.30
2014 Pay 2015	5/13/2015	Howard County Utilities, Inc	\$285.95
2013 Pay 2014	10/30/2014	Howard County Utilities Inc	\$244.99
2013 Pay 2014	6/5/2014	Howard County Utilities, Inc	\$283.14

Total:

Tax Year	Amount
2018 Pay 2019	\$237.24
2017 Pay 2018	\$514.49
2016 Pay 2017	\$531.83
2015 Pay 2016	\$594.65
2014 Pay 2015	\$547.25
2013 Pay 2014	\$528.13

Notes

1/11/2019	Survey	6/20/03 Survey by Wyatt Johnson Inst.#0334013166
11/10/2004	Address Change	Adrs Ch 11/08/2004 per Owner by Phone to GS. CLM
		Adrs Ch 11/16/06 per Owner Frazier by phone to GS. Changed mailing adrs from 1112 Arundel Dr to 273 S 440 W. CLM
8/16/2004	Transfer	Transfer Date: 10/1/2003

No data available for the following modules: Residential Dwellings, Commercial Buildings, Improvements, Deduction, Photos.

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Last Data Upload: 10/10/2019 3:33:39 AM

Version 2.3.8

34-08-04-400-022.000-023

Lods, Scott L

950 W

100, Vacant Land

Monroe Township Homesit

General Information

Parcel Number 34-08-04-400-022.000-023
Local Parcel Number

Ownership

Lods, Scott L
3350 W 250 N
West Lafayette, IN 47906

Transfer of Ownership

Table with columns: Date, Owner, Doc ID, Code, Book/Page, Adj Sale Price, V/I. Rows include dates from 01/01/1900 to 04/08/2009.

Notes

Tax ID:

Legal

PT SE4 4-23-2 33.17 AC

Routing Number 08-04-000-026MO

Property Class 100 Vacant Land



Agricultural

Year: 2019

Valuation Records (Work In Progress values are not certified values and are subject to change)

Table with columns: 2019, 2018, 2017, 2016, 2015. Rows include Assessment Year, Reason For Change, As Of Date, Valuation Method, Equalization Factor, Notice Required, and various value categories like Land, Improvement, Total.

Location Information

County Howard
Township MONROE TOWNSHIP
District 023 (Local 023) MONROE TOWNSHIP
School Corp 3490 WESTERN
Neighborhood 1000001-023 Monroe Township Homesites
Section/Plat 4
Location Address (1) 950 W Kokomo, IN 46902

Land Computations

Table with columns: Description, Value. Rows include Calculated Acreage (33.17), Actual Frontage (0), Developer Discount, Parcel Acreage (33.17), 81 Legal Drain NV (0.00), 82 Public Roads NV (0.01), 83 UT Towers NV (0.00), 9 Homesite (0.00), 91/92 Acres (0.00), Total Acres Farmland (33.16), Farmland Value (\$21,700), Measured Acreage (33.16), Avg Farmland Value/Acre (654), Value of Farmland (\$21,690), Classified Total (\$0), Farm / Classified Value (\$21,700), Homesite(s) Value (\$0), 91/92 Value (\$0), Supp. Page Land Value, CAP 1 Value (\$0), CAP 2 Value (\$21,700), CAP 3 Value (\$0), Total Value (\$21,700).

Zoning

Subdivision

Lot

Market Model 1000001

Characteristics

Topography Rolling Flood Hazard

Public Utilities Electricity ERA

Streets or Roads Paved TIF

Neighborhood Life Cycle Stage Other

Printed Monday, July 22, 2019

Review Group 2016

Land Data (Standard Depth: Res 100', CI 100' Base Lot: Res 0' X 0', CI 0' X 0')

Table with columns: Land Type, Pricing Method, Soil ID, Act Front., Size, Factor, Rate, Adj. Rate, Ext. Value, Infl. %, Res Elig %, Market Factor, Value. Rows include various land parcels with their respective attributes.

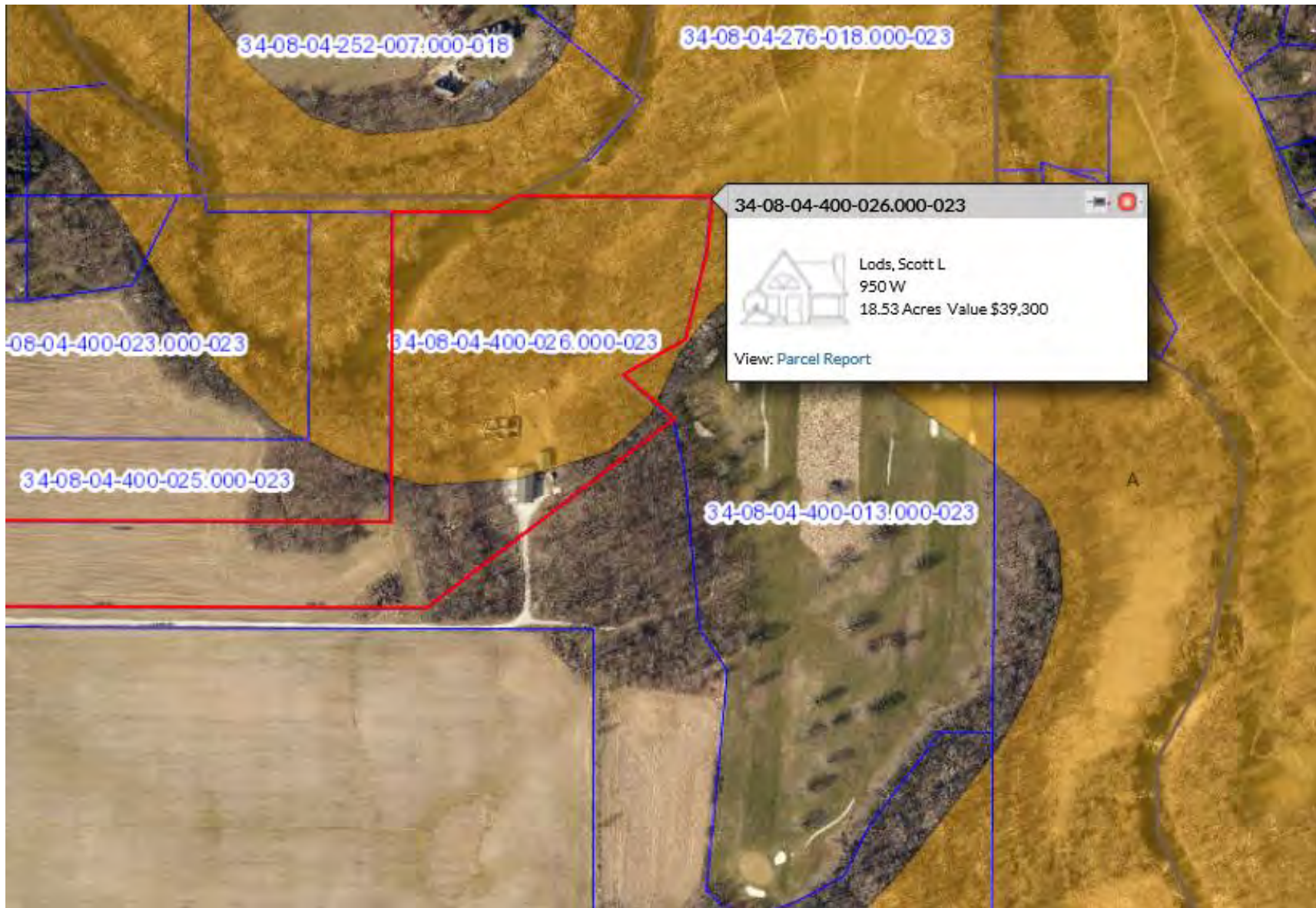
Data Source Estimated

Collector 09/06/2016

RS (AVS)

Appraiser

Land Data (Standard Depth: Res 100', CI 100' Base Lot: Res 0' X 0', CI 0' X 0')												
Land Type	Pricing Method	Soil ID	Act Front.	Size	Factor	Rate	Adj. Rate	Ext. Value	Infl. %	Res Elig %	Market Factor	Value
6	A	MMC3	0	2.2100	0.77	\$1,560	\$1,201	\$2,654	-80%	0%	1.0000	\$530
6	A	SH	0	8.9100	1.11	\$1,560	\$1,732	\$15,432	-80%	0%	1.0000	\$3,090
82	A	BS	0	0.0100	1.28	\$1,560	\$1,997	\$20	-100%	0%	1.0000	\$00





Summary

Parcel ID 34-08-04-400-026.000-023
 Alternate ID
 Property Address 950 W
 Kokomo
 4/23/2
 Sec/Twp/Rng
 Taxing Unit MONROE TOWNSHIP
 Political Township MONROE TOWNSHIP
 Subdivision N/A
 Neighborhood Monroe Township Homesites (1000001-023)
 Zoning N/A
 Building Jurisdiction
 Brief Tax Description PT SE4 4-23-2 18.53 AC
 (Note: Not to be used on legal documents)
 Book/Page N/A
 Acres 18.530
 Class Commercial Other structure

Owners

Deeded Owner
 Lods, Scott L
 3350 W 250 N
 West Lafayette, IN 47906

Taxing District

County: Howard
 Township: MONROE TOWNSHIP
 State District 023 MONROE TOWNSHIP
 Local District: 023
 School Corp: WESTERN
 Neighborhood: 1000001-023 Monroe Township Homesites

Site Description

Topography: Rolling
 Public Utilities: Electricity
 Street or Road: Paved
 Area Quality
 Parcel Acreage: 18.53

Land

Land Type	Soil ID	Act Front.	Eff. Depth	Size	Rate	Adj. Rate	Ext. Value	Infl. %	Value
Primary Commercial/Indust Land		0	0	1	\$27,500.00	\$27,500.00	\$27,500.00	\$0.00	\$27,500.00
Road Right of Way	BS	0	0	0.0600	\$1,560.00	\$1,997.00	\$119.82	(\$100.00)	\$0.00
Tillable Cropland	BS	0	0	0.0400	\$1,560.00	\$1,997.00	\$79.88	\$0.00	\$80.00
Tillable Cropland	FC	0	0	2.1500	\$1,560.00	\$1,732.00	\$3,723.80	\$0.00	\$3,720.00
Woodland	GH	0	0	3.2900	\$1,560.00	\$1,591.00	\$5,234.39	(\$80.00)	\$1,050.00
Farm Ponds	GH	0	0	0.2300	\$1,560.00	\$780.00	\$179.40	(\$40.00)	\$110.00
Woodland	HEE	0	0	3.94	\$1,560.00	\$780.00	\$3,073.20	(\$80.00)	\$610.00
Woodland	MMC3	0	0	0.1700	\$1,560.00	\$1,201.00	\$204.17	(\$80.00)	\$40.00
Woodland	OCB2	0	0	0.0300	\$1,560.00	\$1,388.00	\$41.64	(\$80.00)	\$10.00
Tillable Cropland	OCB2	0	0	0.6700	\$1,560.00	\$1,388.00	\$929.96	\$0.00	\$930.00
Tillable Cropland	RUB2	0	0	2.3800	\$1,560.00	\$1,529.00	\$3,639.02	\$0.00	\$3,640.00
Woodland	RUB2	0	0	0.7600	\$1,560.00	\$1,529.00	\$1,162.04	(\$80.00)	\$230.00
Woodland	SH	0	0	3.0300	\$1,560.00	\$1,732.00	\$5,247.96	(\$80.00)	\$1,050.00
Farm Ponds	WTR	0	0	0.7200	\$1,560.00	\$780.00	\$561.60	(\$40.00)	\$340.00
Woodland	WTR	0	0	0.0600	\$1,560.00	\$780.00	\$46.80	(\$80.00)	\$10.00

Commercial Buildings

Description	C/I Building				Use Area	2,880
	SB	B	1	U	Not in Use	0
Wall Type			1		Use	Commercial Garage
Heating			2880		Floor	1
A/C						
Sprinkler						
Plumbing RES/CI	#	TF	#	TF		
Total	0	0	2	2		

Improvements

Descr	PC	Grade	Year Built	Eff Year	Cond	LCM	Size	Nbhd Factor	Mrkt Factor
C/I Building	100	C	2014	2014	A	1.01	2880	1	1
Detached Garage	100	C	2014	2014	A	1.01	960	1	1

Date	New Owner	Doc ID	Book/Page	Sale Price
5/8/2008	Lods, Scott L	V-Y		\$138,975.00
	BROWN ALAN W & TONYA R			\$0.00

Valuation

Assessment Year	2019	2018	2017	2016	2015
Reason	Annual Adjustment	Annual Adjustment	Annual Adjustment	Annual Adjustment	MISCELLANEOUS
As Of Date	3/21/2019	4/23/2018	5/17/2017	5/18/2016	8/18/2015
Land	\$39,300	\$39,700	\$41,500	\$42,400	\$43,000
Improvement	\$0	\$0	\$0	\$0	\$0
Total	\$39,300	\$39,700	\$41,500	\$42,400	\$43,000

Tax History

All taxes have not been calculated. The amounts showing are an estimate and may not be accurate.

Detail:

Tax Year	Type	Category	Description	Amount	Bal Due
2018 Pay 2019	Property Tax Detail	Tax	1st Installment Tax	\$376.77	\$0.00
2018 Pay 2019	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$23.04	\$0.00
2018 Pay 2019	Property Tax Detail	Tax	2nd Installment Tax	\$376.77	\$376.77
2018 Pay 2019	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	\$0.00
2017 Pay 2018	Property Tax Detail	Tax	1st Installment Tax	\$395.50	
2017 Pay 2018	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$23.04	
2017 Pay 2018	Property Tax Detail	Tax	2nd Installment Tax	\$395.50	
2017 Pay 2018	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2016 Pay 2017	Property Tax Detail	Tax	1st Installment Tax	\$395.30	
2016 Pay 2017	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$23.04	
2016 Pay 2017	Property Tax Detail	Tax	2nd Installment Tax	\$395.30	
2016 Pay 2017	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2015 Pay 2016	Property Tax Detail	Tax	1st Installment Tax	\$446.93	
2015 Pay 2016	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$23.04	
2015 Pay 2016	Property Tax Detail	Tax	2nd Installment Tax	\$446.93	
2015 Pay 2016	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2014 Pay 2015	Property Tax Detail	Tax	1st Installment Tax	\$143.95	
2014 Pay 2015	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$23.04	
2014 Pay 2015	Property Tax Detail	Tax	2nd Installment Tax	\$143.95	
2014 Pay 2015	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	
2013 Pay 2014	Property Tax Detail	Penalty	1st Installment Penalty	\$6.75	
2013 Pay 2014	Property Tax Detail	Tax	1st Installment Tax	\$135.00	
2013 Pay 2014	Special Assessment Detail	Penalty	WATER QUALITY DIST 1st Installment Penalty	\$1.15	
2013 Pay 2014	Special Assessment Detail	Tax	WATER QUALITY DIST 1st Installment Tax	\$23.04	
2013 Pay 2014	Property Tax Detail	Tax	2nd Installment Tax	\$135.00	
2013 Pay 2014	Special Assessment Detail	Tax	WATER QUALITY DIST 2nd Installment Tax	\$0.00	

Total:

Tax Year	Amount	Bal Due
2018 Pay 2019	\$776.58	\$376.77
2017 Pay 2018	\$814.04	
2016 Pay 2017	\$813.64	
2015 Pay 2016	\$916.90	
2014 Pay 2015	\$310.94	
2013 Pay 2014	\$300.94	

If you have had your property combined or have bought or sold only a portion of an existing parcel, please call the Treasurer's Office for accurate tax information.

Payments

Detail:

Tax Year	Payment Date	Paid By	Amount
2018 Pay 2019	5/15/2019	Howard County Utilities Inc	\$399.81
2017 Pay 2018	11/15/2018	Howard County Utilities, Inc.	\$395.50
2017 Pay 2018	4/27/2018	Mail Processing by Star Financial	\$418.54
2016 Pay 2017	11/15/2017	Howard County Utilities Inc	\$395.30
2016 Pay 2017	5/5/2017	Howard County Utilities Inc	\$418.34
2015 Pay 2016	11/15/2016	Howard County Utilities	\$446.93
2015 Pay 2016	5/19/2016	Howard County Utilities	\$469.97
2014 Pay 2015	11/4/2015	Howard County Utilities, Inc	\$143.95
2014 Pay 2015	5/13/2015	Howard County Utilities, Inc	\$166.99

Tax Year	Payment Date	Paid By	Amount
2013 Pay 2014	10/30/2014	Howard County Utilities Inc	\$134.99
2013 Pay 2014	6/5/2014	Howard County Utilities, Inc	\$165.95

Total:

Tax Year	Amount
2018 Pay 2019	\$399.81
2017 Pay 2018	\$814.04
2016 Pay 2017	\$813.64
2015 Pay 2016	\$916.90
2014 Pay 2015	\$310.94
2013 Pay 2014	\$300.94

Notes

11/25/2009	Survey	11/25/09 Survey done by 40th Parallel for Alan W & Tonya R Brown. 6/20/03 Survey by Wyatt Johnson Inst.#0334013166
9/1/2004	Lender	Removed (901) in 04-05 9-01-04
8/16/2004	Split	Split/Comb to parcel 34-08-04-400-021.000-023 for 2004 Pay 2005
8/16/2004	Transfer	Transfer Date: 10/23/2003

No data available for the following modules: Residential Dwellings, Transfer History, Deduction, Photos.

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Last Data Upload: 10/10/2019 3:33:39 AM

Developed by



Version 2.3.8

General Information
Parcel Number
34-08-04-400-026.000-023
Local Parcel Number

Ownership
Lods, Scott L
3350 W 250 N
West Lafayette, IN 47906

Transfer of Ownership

Date	Owner	Doc ID	Code	Book/Page	Adj Sale Price	V/I
05/08/2008	Lods, Scott L	V-Y	WD	/	\$138,975	I
01/01/1900	BROWN ALAN W & T		WD	/	\$0	I

Notes
4/13/2016 16GI: OPERATING UNDER "HOWARD COUNTY UTILITIES, INC" - PP TRACKED IN MVP UNDER 34-09-00-014-000.000-018
7/20/2015 15RE: REMOVED VALUE FROM IMPROVEMENTS (CI BLDG & DET GAR), DUE TO STATE DISTRIBUTED. SENT FORM 113.
6/24/2015 15GI: WATER TANK IS STATE DISTRIB.
6/24/2015 10GI: ALL IMPROVEMENTS TO BE STATE ASSESSED
4/3/2009 09SP: SPLIT FROM 34-08-04-400-021.000-023 TO 34-08-04-400-025.000-023 AND 34-08-04-400-026.000-023

Tax ID:
Routing Number
08-04-000-025MO

Legal
PT SE4 4-23-2 18.53 AC

Property Class 499
Other Commercial Structures



Commercial

Year: 2019
Location Information
County
Howard
Township
MONROE TOWNSHIP
District 023 (Local 023)
MONROE TOWNSHIP
School Corp 3490
WESTERN
Neighborhood 1000001-023
Monroe Township Homesites
Section/Plat
4
Location Address (1)
950 W
Kokomo, IN 46902

Valuation Records (Work In Progress values are not certified values and are subject to change)

2019	Assessment Year	2019	2018	2017	2016	2015
WIP	Reason For Change	AA	AA	AA	AA	Misc
02/24/2019	As Of Date	03/21/2019	04/23/2018	05/17/2017	05/18/2016	08/18/2015
Indiana Cost Mod	Valuation Method	Indiana Cost Mod	Indiana Cost Mod	Indiana Cost Mod	Indiana Cost Mod	Indiana Cost Mod
1.0000	Equalization Factor	1.0000	1.0000	1.0000	1.0000	1.0000
	Notice Required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
\$39,300	Land	\$39,300	\$39,700	\$41,500	\$42,400	\$43,000
\$0	Land Res (1)	\$0	\$0	\$0	\$0	\$0
\$11,800	Land Non Res (2)	\$11,800	\$12,200	\$14,000	\$14,900	\$15,500
\$27,500	Land Non Res (3)	\$27,500	\$27,500	\$27,500	\$27,500	\$27,500
\$0	Improvement	\$0	\$0	\$0	\$0	\$0
\$0	Imp Res (1)	\$0	\$0	\$0	\$0	\$0
\$0	Imp Non Res (2)	\$0	\$0	\$0	\$0	\$0
\$0	Imp Non Res (3)	\$0	\$0	\$0	\$0	\$0
\$39,300	Total	\$39,300	\$39,700	\$41,500	\$42,400	\$43,000
\$0	Total Res (1)	\$0	\$0	\$0	\$0	\$0
\$11,800	Total Non Res (2)	\$11,800	\$12,200	\$14,000	\$14,900	\$15,500
\$27,500	Total Non Res (3)	\$27,500	\$27,500	\$27,500	\$27,500	\$27,500

Land Data (Standard Depth: Res 100', CI 100' Base Lot: Res 0' X 0', CI 0' X 0')

Land Type	Pricing Method	Soil ID	Act Front.	Size	Factor	Rate	Adj. Rate	Ext. Value	Infl. %	Res Elig %	Market Factor	Value
11	OA		0	1	1.00	\$27,500	\$27,500	\$27,500	0%	0%	1.0000	\$27,500
4	A	FC	0	2.1500	1.11	\$1,560	\$1,732	\$3,724	0%	0%	1.0000	\$3,720
4	A	RUB2	0	2.3800	0.98	\$1,560	\$1,529	\$3,639	0%	0%	1.0000	\$3,640
4	A	BS	0	0.0400	1.28	\$1,560	\$1,997	\$80	0%	0%	1.0000	\$80
4	A	OCB2	0	0.6700	0.89	\$1,560	\$1,388	\$930	0%	0%	1.0000	\$930
6	A	MMC3	0	0.1700	0.77	\$1,560	\$1,201	\$204	-80%	0%	1.0000	\$40
6	A	OCB2	0	0.0300	0.89	\$1,560	\$1,388	\$42	-80%	0%	1.0000	\$10
6	A	RUB2	0	0.7600	0.98	\$1,560	\$1,529	\$1,162	-80%	0%	1.0000	\$230
6	A	WTR	0	0.0600	0.50	\$1,560	\$780	\$47	-80%	0%	1.0000	\$10
6	A	HEE	0	3.94	0.50	\$1,560	\$780	\$3,073	-80%	0%	1.0000	\$610
6	A	SH	0	3.0300	1.11	\$1,560	\$1,732	\$5,248	-80%	0%	1.0000	\$1,050
6	A	GH	0	3.2900	1.02	\$1,560	\$1,591	\$5,234	-80%	0%	1.0000	\$1,050
72	A	WTR	0	0.7200	0.50	\$1,560	\$780	\$562	-40%	0%	1.0000	\$340
72	A	GH	0	0.2300	0.50	\$1,560	\$780	\$179	-40%	0%	1.0000	\$110
82	A	BS	0	0.0600	1.28	\$1,560	\$1,997	\$120	-100%	0%	1.0000	\$00

Zoning
Subdivision
Lot
Market Model
1000001
Characteristics
Topography
Rolling
Public Utilities
Electricity
Streets or Roads
Paved
Neighborhood Life Cycle Stage
Other

Data Source Estimated
Collector 10/24/2016 RM
Appraiser 06/16/2015 RM

Land Computations

Calculated Acreage	18.53
Actual Frontage	0
Developer Discount	<input type="checkbox"/>
Parcel Acreage	18.53
81 Legal Drain NV	0.00
82 Public Roads NV	0.06
83 UT Towers NV	0.00
9 Homesite	0.00
91/92 Acres	0.00
Total Acres Farmland	18.47
Farmland Value	\$11,820
Measured Acreage	17.47
Avg Farmland Value/Acre	677
Value of Farmland	\$12,500
Classified Total	\$0
Farm / Classified Value	\$12,500
Homesite(s) Value	\$0
91/92 Value	\$0
Supp. Page Land Value	
CAP 1 Value	\$0
CAP 2 Value	\$11,800
CAP 3 Value	\$27,500
Total Value	\$39,300

General Information

Occupancy	C/I Building	Pre. Use	Commercial Garage
Description	C/I Building	Pre. Framing	Wood Joist
Story Height	1	Pre. Finish	Unfinished
Type	N/A	# of Units	0

SB	B	1	U
-----------	----------	----------	----------

Wall Type	1: 1(232')
Heating	2880 sqft
A/C	
Sprinkler	

Plumbing RES/CI

	#	TF	#	TF
Full Bath	0		0	
Half Bath	0		0	
Kitchen Sinks	0		0	
Water Heaters	0		0	
Add Fixtures	0	2	2	
Total	0	0	2	2

Roofing

<input type="checkbox"/> Built Up	<input type="checkbox"/> Tile	<input type="checkbox"/> Metal
<input type="checkbox"/> Wood	<input type="checkbox"/> Asphalt	<input type="checkbox"/> Slate
<input type="checkbox"/> Other		

GCK Adjustments

<input type="checkbox"/> Low Prof	<input type="checkbox"/> Ext Sheat	<input type="checkbox"/> Insulatio
<input type="checkbox"/> SteelGP	<input type="checkbox"/> AluSR	<input type="checkbox"/> Int Liner
<input type="checkbox"/> HGSR	<input type="checkbox"/> PPS	<input type="checkbox"/> Sand Pnl

Exterior Features

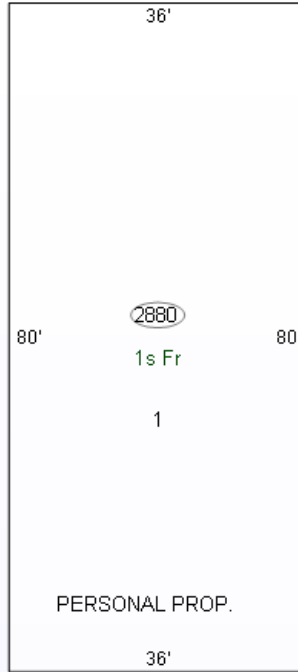
Description	Area	Value
-------------	------	-------

Special Features

Description	Value
-------------	-------

Other Plumbing

Description	Value
-------------	-------



Floor/Use Computations

Pricing Key	GCI
Use	COMGAR
Use Area	2880 sqft
Area Not in Use	0 sqft
Use %	100.0%
Eff Perimeter	232'
PAR	8
# of Units / AC	0 / N
Avg Unit sz dpth	
Floor	1
Wall Height	14'
Base Rate	\$72.76
Frame Adj	(\$10.95)
Wall Height Adj	\$0.00
Dock Floor	\$0.00
Roof Deck	\$0.00
Adj Base Rate	\$61.81
BPA Factor	1.00
Sub Total (rate)	\$61.81
Interior Finish	\$0.00
Partitions	\$0.00
Heating	\$0.00
A/C	\$0.00
Sprinkler	\$0.00
Lighting	\$0.00
Unit Finish/SR	\$0.00
GCK Adj.	\$0.00
S.F. Price	\$61.81
Sub-Total	
Unit Cost	\$0.00
Elevated Floor	\$0.00
Total (Use)	\$178,013

Building Computations

Sub-Total (all floors)	\$178,013	Garages	\$0
Racquetball/Squash	\$0	Fireplaces	\$0
Theater Balcony	\$0	Sub-Total (building)	\$181,213
Plumbing	\$3,200	Quality (Grade)	\$181,214
Other Plumbing	\$0	Location Multiplier	0.88
Special Features	\$0	Repl. Cost New	\$159,467
Exterior Features	\$0		

Summary of Improvements

Description	Res Eligibl	Story Height	Construction	Grade	Year Built	Eff Year	Eff Co Age nd	Base Rate	LCM	Adj Rate	Size	RCN	Norm Dep	Remain. Value	Abn Obs	PC	Nbhd	Mrkt	Improv Value
1: C/I Building	0%	1	SV	C	2014	2014	5 A		0.88		2,880 sqft		12%		0%	100%	1.000	1.0000	\$0
2: Detached Garage	0%	1	SV	C	2014	2014	5 A		0.88		24'x40'		4%		0%	100%	1.000	1.0000	\$0

2340036



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

February 13, 2015

66-34
First Time Development/Green Acres G.C.
Attn: Scott Lods
3350 West 250 North
West Lafayette, IN 47906

Re: Public Water System Inactivation
PWSID #2340036

Dear Mr. Lods:

The Indiana Department of Environmental Management's Drinking Water Branch has received information indicating your facility is no longer in operation. Consequently, as of February 12, 2015, your public water system has been inactivated and is no longer required to comply with the federal and state drinking water testing requirements. **Please notify our office of any status changes regarding your facility.** Your facility information will remain in our files for future reference, if necessary.

Please send or fax all report forms/correspondence to the following:

Indiana Department of Environmental Management
OWQ Drinking Water Compliance – Mail Code 66-34
100 North Senate Avenue, Room 1255
Indianapolis, Indiana 46204-2251
(FAX) (317) 234-7436

If you have any further questions regarding your system's inactivation, please contact Ms. Sara Pierson at (317) 234-7452, or your field inspector, Mr. Alan Melvin, at (317) 234-7605.

Sincerely,

Alan G. Lao, Chief
Public Water Supply Compliance Section
Drinking Water Branch
Office of Water Quality

AGL/LP/sjp
cc: Howard County Health Department
Alan Melvin, Field Inspection Section

System Basic Information Summary

I - 2/12/15 88

IN2340036 FIRST TIME DEVELOPMENT/GREEN ACRES G.C.

Activity	Activity Date	Source Type	System Type	Population	Total Population	Seasonal Dates	Service Area
A	4/3/2007	GW	NC	T 87	88	4 1 to 11 30	GOLF COURSE
Operator Class	Service Connections	Field Inspector		NT 1	Contact Type Key		RECREATION AREA

1

Alan Melvin

AC - Mailing Contact	EC - Emergency Contact	OW - Owner
FC - Financial Contact	OP - Operator	SA - Reminders
DR - Drought Contact		

Contact Information

Type	Contact Name	Street	City	State	Zip	Phone	Ext	Fax
AC	Mr. LODS, SCOTT asu-inc@hotmail.com	3350 West 250 North	WEST LAFAYETTE	IN	47906	765-463-7253		
EC	Mr. LODS, SCOTT asu-inc@hotmail.com	3350 West 250 North	WEST LAFAYETTE	IN	47906	765-463-7253		
FC	Mr. LODS, SCOTT asu-inc@hotmail.com	3350 West 250 North	WEST LAFAYETTE	IN	47906	765-463-7253		
OP	Ms. VANETTEN, CONNIE asu-inc@hotmail.com	3350 West 250 North	WEST LAFAYETTE	IN	47906	765-463-7253		
OW	Mr. LODS, SCOTT asu-inc@hotmail.com	3350 West 250 North	WEST LAFAYETTE	IN	47906	765-463-7253		
PL	PHYSICAL ADDRESS, IN2340036	1300 Green Acres Drive	KOKOMO	IN	46901	765-463-7253		
SA	Mr. LODS, SCOTT asu-inc@hotmail.com	3350 West 250 North	WEST LAFAYETTE	IN	47906	765-463-7253		

2340036

First Time Development Corporation

3350 W. 250 N.
West Lafayette, IN 47906
Tel. 765-463-7253
Fax 765-463-3855

4-Feb-15

To: Alan Melvin
Indiana Department of Environmental Management
Office of Water Quality
Drinking Water Branch Field Inspection Section
100 North Senate Avenue Mail Code 66-34
Indianapolis, IN 46204
amelvin@idem.in.gov

From: Scott L. Lods
President
First Time Development Corp.
DBA Green Acres Golf Club
3350 W 250 N
West Lafayette, IN 47906

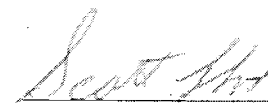
Re: Green Acres Golf Club 1300 Green Acres Drive Kokomo, IN 46901

Alan,

First Time Development DBA Green Acres Golf Club has closed the course under our management and placed it up for sale. The Green Acres Club House has also been closed and the utilities have been disconnected. At this time should we have our PWSID#2340036 deactivated or, should we keep the number active and current for transfer to the new owners? Please advise us with regard to the best procedure to employ in order to make a smooth transition from our ownership to the new owners.

*per Alan
inactivated*
↑

Kind Regards,



Scott L. Lods
President
First Time Development
DBA Green Acres Golf Club
3350 W. 250 N.
West Lafayette, IN 47906
Ph. 765-463-7253
Fax 765-463-3855

First Time Development Corp.
DBA Green Acres Golf Club
3350 W 250 N
West Lafayette, IN 47906
Ph. 765-463-7253
Fax 765-463-3855
1timecdl@comcast.net

Letter of Transmittal

To: Alan Melvin
IDEM-Office of Water Quality
100 North Senate Ave. Mail Code 66-34
Indianapolis, IN 46204
amelvin@idem.in.gov

Date: 6-Feb-15

Phone:
Fax:
Pages 2 (incl. top sheet)

Re: Closure Green Acres Golf Club

Sent 6-Feb-15

Int: _____

VIA: FedEx Hand Delivery Mail Carrier Fax Email

THE FOLLOWING ITEMS:

Plans Copy of Invoice Specifications Change Order
 Permit Other
 For Your Information For Your Use For Review and Comment
 For Your Approval As Requested For Bid Due _____, 20____

Copies	Date	No.	Description

REMARKS: Please contact me @ 765-463-7253 if you should have any questions regarding the following correspondence, Thank You

Signed: Connie L. VanEtten-Controller

If enclosures are not as noted, please kindly notify us at once.

CONFIDENTIALITY NOTICE

The documents accompanying this transmittal contain confidential information. The information is intended only for the use of the individual(s) or entity named above. If you are not the intended recipient, you are notified that any disclosure, copying, or distribution of the transmittal information is not permissible. If you have received this transmittal in error, please immediately notify us by telephone at the number above to arrange for return of the original documents. Thank you.



**APPLICATION FOR WASTEWATER TREATMENT
PLANT CONSTRUCTION PERMIT PER 327 IAC 3**

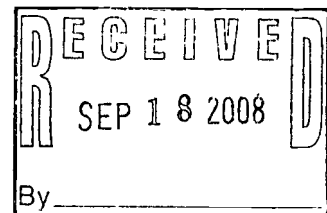
State Form 53160 (11-07)
Approved by State Board of Accounts, 2007

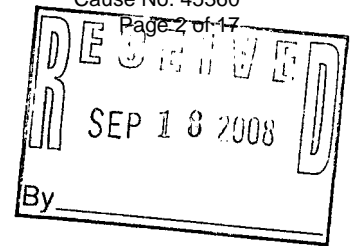
Indiana Department of Environmental Management
Office of Water Quality - Mail Code 65-42
Facilities Construction Section
100 North Senate Avenue, Room N1255
Indianapolis, IN 46204-2251

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 OR LAND SURVEYOR	
Name	Scott Lods	Name	Edward J. Serowka, P.E.
Company Name	Howard County Utilities, LLC	Company Name	Lakeland InnovaTech
Address	3350 W 250 N	Address	49 Boone Village, #243
City	West Lafayette	City	Zionsville
State	Indiana	State	Indiana
ZIP code	47906	ZIP code	46077
Telephone number (including area code)	(765) 463-3856	Telephone number (including area code)	(317) 733-2083
NAME AND LOCATION OF PROPOSED FACILITY		ATTACHMENT CHECKLIST	
Name	Green Acres Wastewater Treatment Plant	A. Wastewater treatment plant design summary form:	<input checked="" type="checkbox"/> Yes
Location (Referenced to two existing streets)	County Road 950 W and County Road 00NS	B. Plans and specifications:	<input checked="" type="checkbox"/> Yes
Location	1200 feet West of C.R. 950 W and 3,250 feet South of C.R. 00NS	C. The appropriate fee (if applicable, no fees for state or federal projects):	<input checked="" type="checkbox"/> Yes
Location	Monroe Township, Howard County	D. Identification of Potentially Affected Persons (see note below):	<input checked="" type="checkbox"/> Yes
City	Kokomo	E. Mailing Labels for Potentially Affected Persons:	<input checked="" type="checkbox"/> Yes
County	Howard County		
<p>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 4-21.5-3-5, IDEM is required to notify potentially affected persons of its permit decision.</p>			
PERMIT APPLICATION FOR CONSTRUCTION, EXPANSION, OR MODIFICATION OF (Check all that apply)		FUNDING	
A. Municipal wastewater treatment facility:	<input type="checkbox"/> Yes	SRF Funding:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B. Semipublic wastewater treatment facility:	<input checked="" type="checkbox"/> Yes		
C. New facility:	<input checked="" type="checkbox"/> Yes		
D. Expansion or modification of existing facility:	<input type="checkbox"/> 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	Scott Lods	Title	President
Signature of Applicant	<i>Scott Lods</i>	Date application signed (month, day, year)	17 SEP 08
Please refer to IC 13-30-10 for penalties of submission of false information			





**Indiana Department of Environmental Management
Office of Water Management
Wastewater Treatment Plant Design Summary**

1. GENERAL

A. Applicant's Name:

Howard Utilities LLC
3350 W. 250 N.
West Lafayette, IN 47906

B. Project Name:

Wastewater Treatment Plant
Green Acres Golf Course and Subdivision
Howard County, Indiana

C. Location:

Approximately 1200 feet west of County Road 950W and 3,250 feet south of County Road 00NS. Part of the Southeast Quarter of Section 4, Township 23 North, Range 2 East, Monroe Township, Howard County, Indiana.

D. Engineer (Consultant):

Lakeland InnovaTech
49 Boone Village, #243
Zionsville, IN 46077
TEL: (317) 733-2083
FAX: (317) 733-2084
E-mail: lakeland-innovatech@earthlink.net

E. NPDES Permit Number: IN0038768

1. Date of Final Permit Issuance: December 1, 2006
2. Expiration Date: November 30, 2011

F. Remarks:

1. Description of Present Situation:

Howard County Utilities LLC has taken over the operation and maintenance of the existing Green Acres Golf Course and Subdivision Wastewater collection and treatment system. One of the current requirements mandated by the Indiana Utility Regulatory Commission (IURC) Cause No. 43294 and required by the Indiana Department of Environmental Management (IDEM) agreed order Cause No. 2007-

17191-W is to construction a new treatment plant outside of the flood way of Wildcat Creek.

The decision to replace the existing treatment plant was because of the following serious problems with the plant:

1. The plant is located in the flood way of the Wildcat Creek and every time it floods, the plant is under water preventing proper operation for many days and even weeks.
2. During wet weather, large amounts of inflow and infiltration (I&I) enter the sanitary sewer system which cannot be handled at the treatment plant. This excess I&I causes a hydraulic overload with washout of solids and bypassing into Wildcat Creek. In addition, there are bypasses in the collection system.
3. For many years the existing lift station was submerged during periods of wet weather. This allowed additional storm water to be pumped to the treatment plant causing a larger hydraulic surge. The lift station wet well has been raised to a level above the food water which has helped; however, since the wet well is still submerged, large amounts of storm water enter the station.
4. The existing plant was installed in 1967 which means that it has been in service for approximately forty (40) years which is double its useful life expectancy of twenty (20) years. It also has not been properly maintained which has resulted in severe corrosion and deterioration, not only of the steel tank walls but also of the various items of equipment. The cost to repair this plant would be excessive, given the age of the plant and its other problems.
5. The size of the existing treatment plant indicates that it was sized for 120,000 gallons per day. It is our belief that there were two (2) plants or phases of plants proposed. Only one was constructed to serve the first phase of the development with the second portion to be installed for the second phase. The second phase was never installed which results in hydraulic and organic overloading even during periods of average design flows. This has resulted in effluent violations of Five Day Carbonaceous Biochemical Oxygen Demand (BOD₅), Total Residual Chlorine (TRC), and Total Suspended Solids (TSS).
6. The existing location does not allow for any expansion or replacement since it is in the floodway and the Department of natural Resources (DNR) will not grant a construction permit in the floodway of the floodplain.

2. Description of Proposed Facilities:

The new plant will be designed for an average daily design flow (ADF) of two hundred thousand (200,000) gallons per day which will be sufficient to handle the flow for their service area for the current and foreseeable future.

A new 15-in. sanitary sewer extension will be provided to connect the existing manhole situation located prior to the existing treatment plant to a new treatment

plant influent lift station located at the head of the new treatment plant. The influent lift station will consist of three (3) submersible sewage pumps and two (2) macerators located in the valve pit.

A new concrete wastewater treatment plant will be installed consisting of one (1) surge tank, one (1) sludge holding tank, two (2) aeration tanks, two (2) final clarifier tanks, one (1) ultraviolet disinfection unit and a post air tank complete with all aeration diffusers, air blowers, control panels etc. required for a complete operating system. One (1) blower building and one (1) control building will be constructed.

3. Inspection during construction to be provided by:

Lakeland InnovaTech
49 Boone Village, #243
Zionsville, IN 46077

G. Estimated Project Cost:

1. Total Cost: \$ 1,000,000.00
2. Source of funding (Revenue, Bond, State Grant, etc.): Private Funds

8. Certification Seal of Engineer:



Edward J. Serowka 9/16/08
Edward J. Serowka, P.E.
P.E. No. 15550

2. DESIGN DATA

- A. Current (or 2008) population:
Total Number Per Capita Population: 1,000 P.E.
- B. Design year and population:
Design year: 2020
Design population: 2,000 P.E.
- C. Design population and equivalent P.E.: 2,000
- D. Design flow: ^{200,000}
1. Domestic: ~~400,000~~ GPD
2. Industrial/Commercial: None
3. Infiltration/Inflow: Peaking Factor – 4.0
- E. Average design peak flow:
~~400,000~~ GPD
- F. Maximum plant flow capacity:
400,000 GPD
- G. Design waste strength:
 - 1. BOD: 240 mg/l
 - 2. SS: 240 mg/l
 - 3. NH₃-N: 35 mg/l
 - 4. P: None
 - 5. Other: None
- H. NPDES permit limits on effluent quality:

<u>Parameter</u>	<u>Influent</u>	<u>Effluent</u>
Average Daily Flow	200,000 GPD	--
Average Design Peak Flow	400,000 GPD	--
BOD₅:		
Summer, Average:	240 mg/l 240 mg/l	25 mg/l (Monthly) (CBOD ₅) 40 mg/l (Weekly) (CBOD ₅)
Winter, Average:	240 mg/l 240 mg/l	25 mg/l (Monthly) (CBOD ₅) 40 mg/l (Weekly) (CBOD ₅)

<u>Parameter</u>	<u>Influent</u>	<u>Effluent</u>
Suspended Solids (TSS):		
Summer, Average:	240 mg/l 240 mg/l	30 mg/l (Monthly) 45 mg/l (Weekly)
Winter, Average:	240 mg/l 240 mg/l	30 mg/l (Monthly) 45 mg/l (Weekly)
Ammonia (NH ₃ N):		
Summer, Average:	35 mg/l 35 mg/l	11 mg/l (Monthly) 17 mg/l (Weekly)
Winter, Average:	35 mg/l 35 mg/l	11 mg/l (Monthly) 17 mg/l (Weekly)
pH:	--	6.0 to 9.0 S.U.
Dissolved Oxygen (DO):		
Summer:	--	6.0 mg/l (Minimum)
Winter:	--	5.0 mg/l (Maximum)
E Coli:		
Monthly, Average:	--	125 count/100 ml
Daily, Maximum:	--	235 count/100 ml
Site Elevation:	750 feet	--
Wastewater Temperature, Minimum:	15 degree C	--
Wastewater Temperature, Maximum:	28 degree C	--
Air Temperature, Winter:	0 - 40 degree F	--
Air Temperature, Summer:	80 - 100 degree F	--

Influent wastewater contains no industrial/toxic materials.

I. Receiving Stream:

1. Name:
Wildcat Creek
2. Tributary to:
N/A
3. Streams uses:
Drainage and Agriculture and Full Body Contact Recreational Use
4. 7-day, 1 in 10 year flow:
16.0 CFS

3. TREATMENT UNITS

A. Plant Site Lift Station:

1. Location:
Prior to the Wastewater Treatment Plant
2. Type of Pump:
Submersible Non-Clog Type Sewage Pumps
3. Number of Pumps:
Three (3) – Two (Current) and ~~One (Future)~~
4. Constant or Variable Speed:
Constant Speed
5. Capacity of Pumps:
560.0 GPM
6. RPM and TDH:
RPM: 1750
TDH: 54 feet
7. Volume of the Wet Well:
2,348.8 Gallons
8. Detention Time in the Wet Well:
Three (3) Minutes
9. A Gate Valve and a Check Valve in the Discharge Line:
Yes
10. A Gate Valve on Suction Line:
Not Applicable
11. Ventilation:
Yes, Static Type
12. Standby Power:
Yes
13. Alarm:
Yes. High Water Alarm Light and Horn.
14. Breakwater Tanks:
Not Applicable

15. Bypass or Overflow:
None

B. Flow Equalization:

1. Number and Size of Units:
One (1) Equalization Tank
Tank Size and Volume:
Tank Width: 49-ft. 3-in.
Tank Length: 24-ft. 0-in.
Tank Height: 24-ft. 0-in.
Tank Side Water Depth: 22-ft. 0-in.
Tank Volume: 194,510.0 Gallons ✓
2. Method of Flow Diversion to Unit:
All the flow enters the tank.
3. Air and Mixing Provided:
Air will be provided by dedicated surge tank blower.
Air provided: 272.0 CFM at 9.5 PSIG
Mixing provided by coarse bubble air diffusers mounted along center of the tank.
4. Method of Control of Flow Return:
Flow control box with measuring weirs.
5. Description of Unit Operation:
All the flow enters the tank. The waste is then pumped to the flow control box where a measured amount flows over a V-notch weir into the aeration tanks. If the flow increases, then the excess flow goes over a rectangular weir back into the surge tank. The rectangular weir is field adjustable.
6. Lagoon Sealing:
None. Concrete tank is used.
7. Method of Sludge Removal:
Not required; all solids are pumped by non-clog type sewage pumps into the aeration tanks.

C. Flow Meters:

1. Type:
Ultrasonic Type.
2. Location:
At the end of the post air tank.
3. Indicating, recording and totalizing:

Yes

D. Grit Chamber: NONE

E. Comminutors:

1. Type:
Two In-Line Macerator/Shredder
2. Location:
On discharge line of influent sewage pumps.
3. Maximum Capacity:
700 GPM (*each*)
4. By-pass (overflow) Barscreen:
None

F. Screens:

1. Type:
Static Coarse Bar Type
2. Number and Capacity:
 - a. One (1) Screen
 - b. Average Design Capacity: 200,000 GPD
3. Bar Spacing and Slope:
 - a. Bar spacing: One (1) inch
 - b. Slope: 45 Degree
4. Method of Cleaning:
Manual
5. Disposal of Screenings:
Land Fill

G. Primary Settling: NONE

H. Activated Sludge:

1. Type of activated sludge process:
Extended Aeration
2. Number and size of units:
Two (2) Aeration Tanks
Tank Size and Volume:
Tank Width: 24-ft. 0-in.

Tank Length: 26-ft. 0-in.
Tank Height: 24-ft. 0-in.
Tank Side Water Depth: 22-ft. 0-in.
Tank Volume: 102,685.4 Gallons

3. Detention time:
24.6 hrs.
4. Organic loading:
14.6 lbs. BOD₅ / 1000 cu.ft. ✓
5. Type of aeration equipment:
Coarse bubble air diffusers mounted along one side of aeration tank.
6. Type and size of blowers:
Two (2) *Sutorbilt* Model 5MP Positive Displacement blowers.
7. Air required (Itemize, CFM):

<u>Parameter</u>	<u>CFM</u>	
Aeration Tank:		
BOD ₅ :	225.3	
NH ₃ :	<u>96.5</u>	
Total Aeration Tank:	321.8	
Return Sludge Airlifts:	24.0	
Surface Skimmers:	24.0	
Post Air Tank:	<u>22.9</u>	
Total Air (CFM):	392.7	(Use 393.0 CFM.)
8. Provisions for speed adjustment:
Yes, V-belt type drive assembly.
9. Air provided:
Yes
10. Ventilation in the blower room:
Yes.
11. Number and capacity of return sludge pumps:
Two (2) 4-in. airlift type return sludge pumps.
Minimum Flow: 69.4 GPM/Pump (100%)
Maximum Flow: 173.5 GPM/Pump (250%)
12. Method of return sludge rate control:

Needle valves on the airlift's air lines.

13. Return sludge rate as percent of design flow:
250% Maximum
14. Provisions for return rate meeting:
Yes, sludge metering control box.
15. Location of return sludge discharge:
At the front of the aeration tank.
16. Facilities to isolate units:
None
17. Facilities for flow split control:
None

I. **Oxidation Ditch:** NONE

J. **Trickling Filter:** NONE

K. **Rotation Biological Contactor:** NONE

L. **Sequential Batch Reactors:** NONE

M. **Lagoons:** NONE

N. **Secondary Clarifier:**

1. Type of Clarifiers:
Rectangular type with hopper bottom.
Number of Hoppers/Clarifier: Two (2)
2. Number and size of units:
Two (2) Clarifiers
Tank Size and Volume:

Tank Width:	24-ft. 0-in.
Tank Length:	12-ft. 0-in.
Tank Height:	24-ft. 0-in.
Tank Side Water Depth:	22-ft. 0-in.
Tank Volume:	20,107.0 Gallons
3. Surface settling rate:
 - a. At the design flow: 347.2 GPD/sq.ft./tank
 - b. At the influent pumping rate: 694.4 GPD/sq.ft./tank
 - c. At the equalized flow rate: 347.2 GPD/sq.ft./tank

4. Detention time:
4.80 hours
5. Type of sludge removal mechanism:
Two (2) – 4-in. airlift pumps
6. Weir overflow rate:
4,166.7 GPD/lin.ft.
7. Disposal of scum:
Surface skimmer pumps the scum back to the sludge holding tank.
8. Facilities for unit isolation:
Yes
9. Facilities for flow split control:
Yes

O. Constructed Wet Lands: NONE

P. Rapid Sand Filtration: NONE

Q. Micro-Strainers: NONE

R. Two-Day Lagoon: NONE

S. Post Aeration:

1. Type of aeration:
Coarse bubble air diffusers.
2. Number of Units:
Two (2) air diffuser drops with a total of four (4) air diffusers.
3. Size of Units:
One (1) Post Aeration Tank
Tank Size and Volume:

Tank Width:	12-ft. 0-in.
Tank Length:	10-ft. 0-in.
Tank Height:	24-ft. 0-in.
Tank Side Water Depth:	19-ft. 0-in.
Tank Volume:	17,054.4 Gallons
4. Aeration Provided:
22.9 CFM from the main aeration blowers.

5. Expected effluent D.O.:
6.0 mg/l (minimum)

T. Nitrification System:

1. Type of nitrification system:
Extended Aeration Modification to the Activated Sludge Process
2. Ammonia loading:
35.0 mg/l
3. Additional oxygen demand:
96.5 CFM (134.3 lbs. oxygen/day)
4. Air supply system:
Positive displacement air blowers and coarse bubble air diffusers.
5. Hydraulic detention time:
24.6 hrs.
6. Mean cell residence time:
36.6 days

U. Phosphorus Removal Facilities: NONE

V. Disinfection: NONE

W. Dechlorination: NONE

X. UV Disinfection:

1. Type of Disinfectant Used:
Ultraviolet
2. Location:
End of Final Clarifier Tank
3. Size of Channel:
14-in.
4. Contact Time:
0.20 minutes
5. Dosage:
8.68.GPM/lamp

- 6. Bypass:
Yes
- 7. Safety Equipment:
Yes. Special Safety glasses
- 8. Cleaning Equipment:
Yes, Cleaning Rack, Manual Cleaning.
- 9. Intensity Monitoring:
Yes

Y. Sludge Thickening: NONE

Z. Anaerobic Digester: NONE

AA. Aerobic Digesters (Sludge Holding Tank):

- 1. Number and size of units:
One (1) Sludge Holding Tank
Tank Size and Volume:
 - Tank Width: 49-ft. 3-in.
 - Tank Length: 24-ft. 0-in.
 - Tank Height: 24-ft. 0-in.
 - Tank Side Water Depth: 22-ft. 0-in.
 - Tank Volume: 194,510.0 Gallons
- 2. Detention time:
83.4 days
- 3. Organic loading:
0.015 lbs. BOD₅/cu.ft.
- 4. Air and Mixing Provided:
Air will be provided by two (2) dedicated sludge holding tank blowers.
Air provided: 780.0 CFM at 9.5 PSIG
Mixing provided by coarse bubble air diffusers mounted along center of the tank.
- 5. Decanting method:
4-in. decanting type airlift assembly.

BB. Wet-Oxidation: NONE

CC. Sludge Drying Beds: NONE

DD. Mechanical Dewatering: NONE

EE. Sludge Disposal:

1. Ultimate Disposal Method of Sludge:
Land disposal.
2. Expected Solids Content of Sludge (by the principal method of disposal):
One (1) to one and one-half (1 1/2) percent.
3. Locations of Disposal Site:
Local wastewater treatment plants.
4. Ownership of the disposal site:
Disposal sites would be owned by the city or town.
5. Availability of Sludge Transport Equipment:
Equipment furnished by septic hauler.

4. SEWER COLLECTION SYSTEM

A. **Lift Stations:** NONE

B. **Sewer:**

1. Type of Sewer Material:
PVC SDR 35 Pipe
2. Diameter and length of sewer (indicate length for each size):
Sewer Diameter: 15-in. Diameter
Sewer Length: Approximately 1,500 feet long
3. Stream, highway, and railroad crossing:
None *Stream*
4. Separate of combined sewer or new sewer:
Yes
5. Number of manholes:
Three (3)
6. Water main protection:
Yes

C. **Individual Grinder Pumps:** NONE

5. MISCELLANEOUS

- A. Laboratory equipment:
All testing of the wastewater is done by a certified laboratory off site.
- B. Safety equipment:
Rubber gloves and safety goggles.
- C. Plant site fence:
Yes
- D. Handrail for the tanks:
Yes, where required.
- E. Units, unit operation and plant bypasses:
None
- F. Flood elevation, MSL (10, 25 or 100 year flood):
100 year flood elevation: 738.6
- G. Provisions to maintain the same degree of treatment during construction:
Yes
- H. Standby power equipment:
Yes
- I. Site inspection:
Yes
- J. Statement in the specification as to the protection against any adverse environmental effect (e.g. dust, noise, soil erosion) during construction:
Yes
- K. Hoists for removing heavy equipment:
Yes
- L. Adequate sampling facilities:
Yes
- M. Hydraulic Gradient:
Yes
- N. Septage receiving facilities:
None