



CITY OF ANGOLA
OFFICE OF THE MAYOR
210 NORTH PUBLIC SQUARE
ANGOLA, INDIANA 46703-1960

PH. (260) 665-2514

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FAX (260) 665-9164

September 24, 2019

Mrs. Beverly Gard, Chair
Environmental Rules Board
1686 Summerwood Boulevard
Greenfield, IN 46140

Re:Support of Petition to Adopt Variant of the 2012 Recreational Water Quality Criteria

Dear Ms. Gard:

The purpose of this correspondence is to show our support for the petition to the Indiana Environmental Rules Board to require the Indiana Department of Environmental Management to update water quality standards to align with the intents and purposes of the 2012 EPA Recreational Water Quality Criteria (RWQC).

Over the last 20 years, Indiana communities have made historic investments to improve water quality by expanding sewer and wastewater treatment infrastructure to significantly reduce combined sewer overflows (CSO's) caused by rain and snow melt. Indiana communities are currently committed to spend over four billion dollars to reduce CSO's and protect the environment by completing their approved CSO Long Term Control Plans. With so many infrastructure needs, non-beneficial spending on additional CSO controls is the wrong investment.

Indiana's current standards are not based on the most recent science and need to be updated to remain competitive with neighboring EPA Region 5 states (Ohio and Wisconsin). The EPA 2012 RWQC are designed to protect the public from exposure to pathogens while participating in water-contact activities such as swimming, wading, etc. The 2012 RWQC has flexibility to be construed to allow a 10% exceedance for compliance determination over a 90-day period based on the detailed technical evaluation performed by EPA.

If the criteria are not adopted here and our wastewater utilities are forced to make additional investments in CSO infrastructure -- improvements that will not be required in Ohio or Wisconsin, our utility rates will not be economically competitive and that will hurt Indiana when competing for new businesses with other states. The existing means of providing regulatory certainty is the Use Attainability Analysis (UAA) process. The UAA process is described in Indiana's Non-Rule Policy Document Water-014. This process provides only temporary relief; it must be reauthorized every five years by both IDEM and EPA; it is unproven; it will require significant review effort by IDEM/EPA staff; and development of the UAA imposes another cost on each wastewater utility.

Updating Indiana Water Quality Standards to match EPA's 2012 RWQC (with some variation) will provide certainty to over 100 Combined Sewer Overflow (CSO) Communities throughout the state and ensure that future investments in wastewater infrastructure are not wasted on massively expensive projects with no environmental benefit, while ignoring other critical infrastructure needs in communities.

Sincerely,

A handwritten signature in cursive script that reads "Richard M. Hickman".

Mayor Richard Hickman
City of Angola, Indiana
260-665-2514

Cc: Craig Williams – Superintendent, Angola Wastewater Treatment
Karl Kopec – Manager, Mishawaka Wastewater Treatment Division
Brady Dryer – Environmental Compliance Manager, Commonwealth Engineers
Tim Healy – Associate, Greeley & Hansen



City of Columbia City

Mayor

Ryan L. Daniel
112 S. Chauncey Street
Columbia City, IN 46725
OFFICE: 260-248-5111
FAX 260-248-5134
rdaniel@columbiacity.net

10/7/2019

Mrs. Beverly Gard, Chair
Environmental Rules Board
1686 Summerwood Boulevard
Greenfield, IN 46140

Re: Support of Petition to Adopt Variant of the 2012 Recreational Water Quality Criteria

Dear Ms. Gard:

I am writing to show the City of Columbia City's support for the petition to the Indiana Environmental Rules Board to require the Indiana Department of Environmental Management to update water quality standards to align with the intents and purposes of the 2012 EPA Recreational Water Quality Criteria (RWQC).

Columbia City has spent tens of millions of dollars over the past 20 years, in order to meet the IDEM standards for CSO outfalls and to improve our stormwater systems. As I write, we are beginning the third and final phase of our Long-Term Control Plan (LTCP) which, when completed, will bring the City LTCP's total cost to over \$35 Million. Further, as you know, Indiana communities have made historic investments to improve water quality by expanding sewer and wastewater treatment infrastructure to significantly reduce combined sewer overflows (CSO's). As a whole, Indiana communities are currently committed to spend over four billion dollars to reduce CSO's and protect the environment by completing their approved CSO Long Term Control Plans. Because these hard-earned dollars are coming from Hoosier pocketbooks, we must ensure these investments will be impactful to solving the issues at hand.

Unfortunately, Indiana's current standards are not based on the most recent science and need to be updated to remain competitive with neighboring EPA Region 5 states (Ohio and Wisconsin). The EPA 2012 RWQC are designed to protect the public from exposure to pathogens while participating in water-contact activities such as swimming, wading, etc. The 2012 RWQC has flexibility to be construed to allow a 10% exceedance for compliance determination over a 90-day period based on the detailed technical evaluation performed by EPA.

If the criteria are not adopted here and our wastewater utilities are forced to make additional investments in CSO infrastructure -- improvements that will not be required in Ohio or Wisconsin, our utility rates will not be economically competitive and that will hurt Indiana when competing for new businesses with other states. Even locally, Cities are held to a higher standard than our unincorporated neighbors, making us even less financially competitive. The existing means of providing

regulatory certainty is the Use Attainability Analysis (UAA) process. The UAA process is described in Indiana's Non-Rule Policy Document Water-014. This process provides only temporary relief; it must be reauthorized every five years by both IDEM and EPA; it is unproven; it will require significant review effort by IDEM/EPA staff; and development of the UAA imposes another cost on each wastewater utility.

Updating Indiana Water Quality Standards to match EPA's 2012 RWQC (with some variation) will ensure that we, as Hoosier leaders, are investing in projects that will significantly enhance the environment, while improving the lives of current and future residents. Let's not waste money on projects that puts tremendous strain on our fellow Hoosiers, while having little impact on the environment. Thank you for your consideration of this tremendously impactful change.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan L. Daniel". The signature is fluid and cursive, with the first name "Ryan" and last name "Daniel" clearly distinguishable.

Ryan L. Daniel
Mayor – City of Columbia City

Cc: Craig Williams – Superintendent, Angola Wastewater Treatment
Karl Kopec – Manager, Mishawaka Wastewater Treatment Division
Brady Dryer – Environmental Compliance Manager, Commonwealth Engineers
Tim Healy – Associate, Greeley & Hansen



CITY OF HUNTINGTON

Mayor's Office

300 Cherry Street, Huntington, IN 46750
Phone: (260) 356-1400 EXT 2000 Fax: (260) 358-2338

October 2, 2019

Mrs. Beverly Gard, Chair
Environmental Rules Board
1686 Summerwood Boulevard
Greenfield, IN 46140

Re: Support of Petition to Adopt Variant of the 2012 Recreational Water Quality Criteria

Dear Ms. Gard:

The purpose of this correspondence is to show our support for the petition to the Indiana Environmental Rules Board to require the Indiana Department of Environmental Management to update water quality standards to align with the intents and purposes of the 2012 EPA Recreational Water Quality Criteria (RWQC).

Over the last 20 years, Indiana communities have made historic investments to improve water quality by expanding sewer and wastewater treatment infrastructure to significantly reduce combined sewer overflows (CSO's) caused by rain and snow melt. Indiana communities are currently committed to spend over four billion dollars to reduce CSO's and protect the environment by completing their approved CSO Long Term Control Plans. With so many infrastructure needs, non-beneficial spending on additional CSO controls is the wrong investment.

Indiana's current standards are not based on the most recent science and need to be updated to remain competitive with neighboring EPA Region 5 states (Ohio and Wisconsin). The EPA 2012 RWQC are designed to protect the public from exposure to pathogens while participating in water-contact activities such as swimming, wading, etc. The 2012 RWQC has flexibility to be construed to allow a 10% exceedance for compliance determination over a 90-day period based on the detailed technical evaluation performed by EPA.

If the criteria are not adopted here and our wastewater utilities are forced to make additional investments in CSO infrastructure -- improvements that will not be required in Ohio or Wisconsin, our utility rates will not be economically competitive and that will hurt Indiana when competing for new businesses with other states. The existing means of providing regulatory certainty is the Use Attainability Analysis (UAA) process. The UAA process is described in Indiana's Non-Rule Policy Document Water-014. This process provides only temporary relief; it must be reauthorized every five years by both IDEM and EPA; it is unproven; it will require significant review effort by IDEM/EPA staff; and development of the UAA imposes another cost on each wastewater utility.

Updating Indiana Water Quality Standards to match EPA's 2012 RWQC (with some variation) will provide certainty to over 100 Combined Sewer Overflow (CSO) Communities throughout the state and ensure that future investments in wastewater infrastructure are not wasted on massively expensive projects with no environmental benefit, while ignoring other critical infrastructure needs in communities.

Sincerely,



Mayor Brooks Fetters

Cc: Craig Williams – Superintendent, Angola Wastewater Treatment
Karl Kopec – Manager, Mishawaka Wastewater Treatment Division
Brady Dryer – Environmental Compliance Manager, Commonwealth Engineers
Tim Healy – Associate, Greeley & Hansen



CITY OF MISHAWAKA

DAVID A. WOOD, MAYOR

OFFICE OF THE MAYOR

September 27, 2019

Mrs. Beverly Gard, Chair
Environmental Rules Board
1686 Summerwood Boulevard
Greenfield, IN 46140

Re: Support of Petition to Adopt Variant of the 2012 Recreational Water Quality Criteria

Dear Ms. Gard:

The purpose of this correspondence is to show our support for the petition to the Indiana Environmental Rules Board to require the Indiana Department of Environmental Management to update water quality standards to align with the intents and purposes of the 2012 EPA Recreational Water Quality Criteria (RWQC).

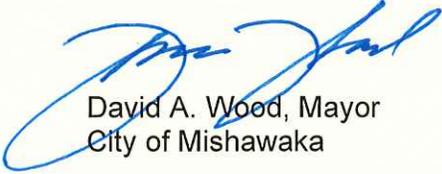
Over the last 20 years, Indiana communities have made historic investments to improve water quality by expanding sewer and wastewater treatment infrastructure to significantly reduce combined sewer overflows (CSO's) caused by rain and snow melt. Indiana communities are currently committed to spend over four billion dollars to reduce CSO's and protect the environment by completing their approved CSO Long Term Control Plans. With so many infrastructure needs, non-beneficial spending on additional CSO controls is the wrong investment.

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If the criteria are not adopted here and our wastewater utilities are forced to make additional investments in CSO infrastructure -- improvements that will not be required in Ohio or Wisconsin, our utility rates will not be economically competitive and that will hurt Indiana when competing for new businesses with other states. The existing means of providing regulatory certainty is the Use Attainability Analysis (UAA) process. The UAA process is described in Indiana's Non-Rule Policy Document Water-014. This process provides only temporary relief; it must be reauthorized every five years by both IDEM and EPA; it is unproven; it will require significant review effort by IDEM/EPA staff; and development of the UAA imposes another cost on each wastewater utility.

Updating Indiana Water Quality Standards to match EPA's 2012 RWQC (with some variation) will provide certainty to over 100 Combined Sewer Overflow (CSO) Communities throughout the state and ensure that future investments in wastewater infrastructure are not wasted on massively expensive projects with no environmental benefit, while ignoring other critical infrastructure needs in communities.

Sincerely,



David A. Wood, Mayor
City of Mishawaka

Cc: Craig Williams – Superintendent, Angola Wastewater Treatment
Karl Kopec – Manager, Mishawaka Wastewater Treatment Division
Brady Dryer – Environmental Compliance Manager, Commonwealth Engineers
Tim Healy – Associate, Greeley & Hansen



OFFICE OF THE MAYOR
CITY OF NEW HAVEN

P.O. Box 570
815 Lincoln Highway East
(260) 748-7070 (260) 748-7979 Fax
www.newhavenin.org

September 24, 2019

Mrs. Beverly Gard, Chair
Environmental Rules Board
1686 Summerwood Boulevard
Greenfield, IN 46140

Re: Support of Petition to Adopt Variant of the 2012 Recreational Water Quality Criteria

Dear Mrs. Gard:

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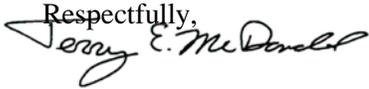
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September 24, 2019
Page Two

Updating Indiana Water Quality Standards to match EPA's 2012 RWQC (with some variation) will provide certainty to over 100 Combined Sewer Overflow (CSO) Communities throughout the state and ensure that future investments in wastewater infrastructure are not wasted on massively expensive projects with no environmental benefit, while ignoring other critical infrastructure needs in communities.

Thank you for your assistance.

Respectfully,

A handwritten signature in black ink that reads "Terry E. McDonald". The signature is written in a cursive style with a large, sweeping initial "T".

Terry E. McDonald
Mayor
City of New Haven

Cc: Dave Jones – Utility Superintendent, City of New Haven
Keith Schlegel – Director of Engineering, City of New Haven
Brady Dryer – Environmental Compliance Manager, Commonwealth Engineers



Mayor's Office City of Peru



September 25, 2019

Mrs. Beverly Gard, Chair
Environmental Rules Board
1686 Summerwood Boulevard
Greenfield, IN 46140

Re: Support of Petition to Adopt Variant of the 2012 Recreational Water Quality Criteria

Dear Ms. Gard:

The purpose of this correspondence is to show our support for the petition to the Indiana Environmental Rules Board to require the Indiana Department of Environmental Management to update water quality standards to align with the intents and purposes of the 2012 EPA Recreational Water Quality Criteria (RWQC).

Over the last 20 years, Indiana communities have made historic investments to improve water quality by expanding sewer and wastewater treatment infrastructure to significantly reduce combined sewer overflows (CSO's) caused by rain and snow melt. Indiana communities are currently committed to spend over four billion dollars to reduce CSO's and protect the environment by completing their approved CSO Long Term Control Plans. With so many infrastructure needs, non-beneficial spending on additional CSO controls is the wrong investment.

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Mayor's Office City of Peru



massively expensive projects with no environmental benefit, while ignoring other critical infrastructure needs in communities.

Sincerely,

CITY OF PERU

Mayor, Gabriel Greer

Cc: Craig Williams – Superintendent, Angola Wastewater Treatment
Karl Kopec – Manager, Mishawaka Wastewater Treatment Division
Brady Dryer – Environmental Compliance Manager, Commonwealth Engineers
Tim Healy – Associate, Greeley & Hansen



CITY OF RENSSELAER

RENSSELAER, INDIANA

STEPHEN A. WOOD, *Mayor*
FRIEDA BRETZINGER, *Clerk-Treasurer*

COUNCIL MEMBERS
WILLIAM HOLLERMAN, *First Ward*
RICK L. ODLE, *Second Ward*
GEORGE T. COVER, *Third Ward*
ERNEST WATSON, *Fourth Ward*
SCOTT BARTON, *At-Large*

September 30, 2019

Mrs. Beverly Gard, Chair
Environmental Rules Board
1686 Summerwood Boulevard
Greenfield, IN 46140

Re: Support of Petition to Adopt Variant of the 2012 Recreational Water Quality Criteria

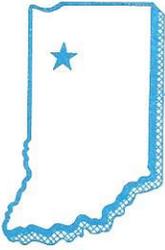
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The City of Rensselaer is 1 of the over 100 CSO communities. And, like most CSO communities, the required CSO LTCP represents the largest capital improvements project in history. Since 1992 when the City initiated compliance with State and Federal CSO policy, over \$15M in CSO mitigation projects has been invested. The City is under a state enforcement action (State Agreed Judgement) to spend an additional \$27.8M through 2030. This brings the total of CSO wastewater utility improvements to \$42.6M for a community that has a population of 5,878. Currently, the average monthly residential customer wastewater utility bill is over \$49 per month. The required future CSO and wastewater improvements are projected to drive the average monthly residential wastewater rate in excess of \$110 per month by 2030!

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CITY OF RENSSELAER

RENSSELAER, INDIANA

STEPHEN A. WOOD, *Mayor*
FRIEDA BRETZINGER, *Clerk-Treasurer*

COUNCIL MEMBERS
WILLIAM HOLLERMAN, *First Ward*
RICK L. ODLE, *Second Ward*
GEORGE T. COVER, *Third Ward*
ERNEST WATSON, *Fourth Ward*
SCOTT BARTON, *At-Large*

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Sincerely,

CITY OF RENSSELAER

Mayor, Stephen A. Wood

Cc: Jerry Lockridge- Project Coordinator, City of Rensselaer
Bryce Black-Wastewater Treatment Operator, City of Rensselaer
Brady Dryer-Environmental Compliance Manager, Commonwealth Engineers