Ms. Leigh Voss
Permit Writer
Office of Water Quality/Permitting Branch
Indiana Department of Environmental Management
Mail Code Mail Code 65-42
100 N. Senate Ave.
Room IGCN 1255
Indianapolis, IN 46204

April 15, 2009

RE: NPEDS Permit No. IN0025135, Request for Permit Modification

Dear Ms. Voss:

In reference to the comment letter you received on our NPDES Discharge Permit Modification, we request that you consider the economic and social impacts of the new permit. The Austin Sanitary Sewer System was initially constructed approximately 35 years ago. All of the sanitary sewer lines were constructed using vitrified clay pipe, which is a ridged piping system and well known for developing cracks and splits. These pipe defects allow storm water to enter the Sanitary Sewer System during storm events. This phenomenon is typically referred to as infiltration and inflow (I/I).

Over the years the I/I into our Sanitary Sewer System increased to the point where during wet weather periods the capacity of our sewer lines, lift stations, and treatment plant were exceeded. To address this issue, Austin conducted a Preliminary Engineering Report to document and quantify all problems in the system, develop alternatives to address these issues, analyze the alternatives using sound engineering principals and recommend a plan for implementation. Once the Preliminary Engineering Report (PER) was completed, Austin held a public hearing to present the PER and explain the project recommended for implementation. The purpose of this hearing was to obtain input from the public and special interest groups about the details of the proposed plan. In general, the comments on the proposed plan were positive as it would eliminate sanitary sewer overflows in the collection system and by-passes at the treatment plant.

Using the PER recommendations, Austin raised their sewer rates and issued a bond to fund the project. We also received grant money from Rural Development and the Economic Development Agency to complete the project funding. Once we secured all funding for the project, the design was completed and the project constructed. Throughout this 8 year process we have had numerous public hearings on the project to obtain input from the public and special interest groups. In general, all of the comments we received were positive as this project will improve the environment and provide a much higher level of public safety.

When designing the improvements to the Sanitary Sewer System, it was necessary to increase the capacity of our treatment plant which required a modification of our Discharge Permit. There are two factors that contribute to the need to increase the plant capacity. The first factor is increase flow from eliminating the sanitary sewer overflows. Our project included eliminating all known sources of I/I. However, it is not feasible to eliminate all I/I in a Sanitary Sewer System especially considering the age and composition of our gravity sewers. Since the sanitary sewer overflows were eliminated, more sewage is transported to the plant and the capacity must be increased.

The second factor that required an increase in plant capacity is growth in the system. Our engineers provided excess capacity for anticipated growth in the system over the life of the plant. Using this

approach, Austin is in a position to create a sustainable environment by matching controlled growth to plant capacity.

Without an increase in wastewater treatment plant capacity, Austin would face considerable adverse economic issues. If the plant capacity was not increased the majority of the sewer lines, property service connections, and private service lines would have to be replaced in an attempt to eliminate all I/I into the system. The cost for this would be staggering and is not a feasible approach. If implemented sewer rates could easily triple (over the rate increase implemented for the selected project) and when construction was completed; the sewer plant would be at full capacity. This approach would not be acceptable IDEM based on the terms and conditions of our Agreed Order.

Without surplus plant capacity the business in our community would not be able to expand. This may force these businesses to leave the City which would have a significant adverse impact on our local economy.

Limiting the capacity of the Austin wastewater treatment plant would have the unintended impact of increasing water and air pollution. If new connections to the Sanitary Sewer System are not available due to limited capacity, there will be an increase in individual treatment systems and cluster systems. This will result in urban sprawl as houses and satellite developments are constructed outside the Austin City limits. This will result in longer commutes and consequently increase air pollution. Considering the soil types and frequency of flooding in our area, increases in individual or cluster treatment systems are not desirable because they may lead to significant non-point source water pollution.

In summary, without an increase in the capacity of our treatment plant, Austin will not be able to meet the requirements of their NPDES Discharge Permit or comply with the requirements of our Agreed Order. We will also not be able to comply with the grant agreements made with Rural Development and the Economic Development Agency. Limited plant capacity will also adversely affect our chances for business growth and create urban sprawl. Austin is committed to providing our citizens with a complete living environment where all of their basic needs can be met locally. Without an increase in plant capacity we cannot achieve this goal. After all the years of planning, meeting with various Federal, State, and local agencies and holding numerous public hearings on this issue, we believe that it is evident that an increase in the Austin Wastewater Treatment Plant capacity is appropriate, justifiable and the responsible course of action.

We appreciate this opportunity to express our position on this topic. If you have questions or require additional information feel free to contact me.

Sincerely,

Doug Campbell
Mayor

cc: Howard Watts, Austin Superintendent
David Eberenz, Capitol Engineering, Inc.
Steve Tolliver, Aqua Utility Services, LLC