



**Indiana Department of Environmental Management
Indiana Water Environment Association – Government Affairs Committee
Meeting Minutes**

Indiana Government Center North 12th Floor – Conference Room E

May 9, 2019

1:00 PM – 2:30 PM

Agenda:

1. Introductions
 - a. Martha Clark-Mettler (IDEM), Paul Higginbotham (IDEM), Jason House (IDEM), Camille Meiners (SRF), Brian Neilson (HWC/IWEA), Tim Healy (Greeley-Hansen/IWEA), Sarah Mitchell (Elkhart) and Brady Dyer (CEI/IWEA).
2. IFA-SRF Update
 - a. General Funding Update
 - i. New initiative to close approximately 20 loans per quarter to manage workload of all stakeholders
 - ii. Financial Advisor to initiate intent to close with letter to IFA
 - iii. See attached email for additional details
 - iv. January 1, 2019 represents the “bypass” period whereby projects are funded on a first come, first serve basis
 - v. 2020 Projections:
 1. \$35M for Drinking Water
 2. \$200M to \$300M for Wastewater
 - vi. PERs for FY 2020 due June 14, 2019
 - vii. Water Infrastructure Improvements for the Nation (WIIN) Act to provide for drinking water lead testing in schools.
3. Total Nitrogen Monitoring Notification for Major (≥ 1.0 MGD) Municipal Dischargers
 - a. Total Nitrogen = TKN + nitrite + nitrate
 - b. Impacted a few permits thus far in 2019
 - c. More permits to be impacted in 2020



- d. Grab sample (vs. 24-hour composite)
 - e. HACH Total Nitrogen Method using TNT for DR 3900 spectrophotometer not approved by EPA.
4. EPA POTW Secondary Treatment Questionnaire Status
- a. Questionnaire not issued to POTWs as of June 13, 2019.
 - b. EPA removed draft survey from website to avoid confusion.
5. Federal NPDES Rule Update
- a. See link for proposed NPDES Renewal Forms:
<https://www.epa.gov/npdes/npdes-application-forms>
 - b. IDEM requested feedback on forms found at link above.
 - c. Implementation may require rule change
 - d. State Form update likely
 - e. State to implement after June 12, 2019
 - f. IDEM coordinating with other states to determine how to meet requirements
 - g. Until notified otherwise, permittees requested to use current state forms
6. Water Quality Criteria for Metals Status
- a. Moving forward, albeit slowly
 - b. Selenium has caused delays – mostly impacts Coal energy dischargers
 - c. Selenium implementation questions remain - dissolved metals (for fish tissue) versus total (for NPDES permits)
 - d. IDEM developing approach to address
7. Ohio River Sanitation Commission (ORSANCO) Pollution Control Standards (PCSs) Review
- a. Initial plan to eliminate ORSANCO PCSs decision tabled in October 2018
 - b. Recent divergence from approach due to benefit of state flexibility
 - c. ORSANCO Specific requirements for municipal sanitary permittees – year-round disinfection and Acute Ammonia Criteria
 - d. Revised PCSs issued on June 6, 2019:
<http://www.orsanco.org/programs/pollution-control-standards/>
8. 2012 RWQC Update
- a. IDEM has conducted additional coordination with EPA



- b. EPA has reviewed version of RWQC change for CSOs and has prepared an alternate version
 - c. EPA Headquarters has been involved as well
 - d. Additional discussion on Integrated Planning and Clean Water Act compliance ensued
9. Compliance/Enforcement Updates
- a. Increase compliance issues with semi-public WWTPs.
 - b. Recent Sewer Ban issuance – Town of Frankton
 - c. No updates on SSO compliance
 - d. Compliance Data Section continues to closely monitor NPDES Schedule of Compliance Updates
 - e. IDEM initiative to reduce those permittees deemed to be in Significant Noncompliance
 - f. IDEM staff reminded group of CSO milestone reporting obligations
10. Operator Certification Rule Work Group Update
- a. Draft Rule Revisions sent to IDEM Rules Section for review and processing
 - b. Revisions from Rules Section sent back to OWQ for review
 - c. 1st Public Notice forthcoming
11. MS4 Program Update
- a. General Permit Work Group Activities ongoing
 - b. House Bill 1266 language to be included into Draft MS4 General Permit.
 - c. Implications to be discussed in greater detail and Annual MS4 Meeting on May 14, 2019
 - d. Site Runoff SWPPP review timing discussed as required by HB 1266
12. Construction Site Run-Off General Permit Status
- a. No formal update provided
 - b. To be adopted concurrent with MS4 General Permit
13. 2019 IDEM Initiatives & Legislative Update
- a. Main IDEM Initiative - Assume Section 404 permitting from USACE
 - b. Senate Bill 4: Water and Wastewater Utilities and Runoff
 - i. Study to include stormwater (including agriculture)



- ii. Asset Management Program (AMP) applied to facilities greater than 100,000 gallons per day average design flow
 - iii. IDEM implementation/tracking of AMPs to be determined
 - iv. Water Loss Audit Requirements
- c. House Bill 1278: Various Environmental Matters:
- i. Allows IDEM to increase fees with Environmental Rules Board (ERB) Approval
 - ii. Electronic submittals for Drinking Water Labs
 - iii. Removes Indiana State Department of Health rep from ERB and replaces seat with Construction Representative
 - iv. Modifies septage vehicle designation
 - v. Develops energy Task Force.



State Revolving Fund Loan Program
an Indiana Finance Authority Environmental Program

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Director of State Revolving Fund Loan Program
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MEMORANDUM

TO: Prospective SRF Loan Participants (Beginning July 1, 2019)

FROM: Bill Harkins, SRF Program Director 

DATE: April 16, 2019

RE: SRF Financing Schedule Changes – SFY 2020

It is an exciting time at the Indiana Finance Authority's State Revolving Fund (SRF) Loan Program as we continue to partner with Indiana communities to finance projects that protect public health and the environment. We are pleased with the new initiatives and programs that have been implemented, all in the spirit of providing the lowest cost financing options to Indiana communities. In State Fiscal Year 2019, new program records were set for the amount of funding we provided (to-date, over \$539 Million dollars for 47 borrowers), and we anticipate the same trend for the upcoming State Fiscal Year 2020, which begins on July 1, 2019.

Because the SRF Loan Program has seen a substantial increase in the demand for loan funds over the past several years, we are introducing an exciting new change for State Fiscal Year 2020. The traditional financing schedule will be adjusted beginning with the upcoming funding cycle, starting on July 1, 2019. The Project Priority List (PPL) will continue to be published on July 1, and updated quarterly. However, the last date for loan applicants in the fundable range to complete financings will now be March 31, 2020.

This change will provide an additional 90 days for loan applicants to open bids, secure all required permits, and gather all documentation necessary for an SRF loan closing. Of equal importance and in order to limit the challenges created by an overly crowded closing schedule, SRF will also implement a new policy that will cap the number of borrowings completed in any given quarter to 20. SRF will develop a calendar which can be viewed online so that Indiana communities can both view availability and select the quarter in which they can close. Look for the calendar to be posted on IFA's website by May 1, 2019 under the SRF Section "Items of Interest."

In order to schedule a financing in any given quarter, the municipal advisor representing the SRF borrower, must contact Bill Harkins, SRF Program Director, and provide in writing (see attached template) a commitment to complete a financing in the desired quarter. To better increase the



likelihood of reserving a spot in a specific quarter, SRF recommends communities submit a letter of commitment as soon as possible. As the quarters continue, the number of reservations available will diminish, and thus, SRF encourages communities to submit the commitment letter early. In order to officially be placed in the closing queue, SRF borrowers must have opened bids, secured required land and permits, and submitted Financial Due Diligence for review by the SRF Loan Program by the dates below for each quarter:

SFY 2020*
Milestone Deadlines

Q1 July 1 - Sept. 30	Q2 Oct. 1 - Dec. 31
Open Bids: 8/9/2019 Permit Approved: 8/16/2019 FDD to SRF: 9/3/2019 Closing Docs to SRF: 9/9/2019 Last Q1 Preclose: 9/16/2019 Last Q1 Close: 9/30/2019	Open Bids: 10/18/2019 Permit Approved: 10/25/2019 FDD to SRF: 11/13/2019 Closing Docs to SRF: 11/20/2019 Last Q2 Preclose: 12/2/2019 Last Q2 Close: 12/16/2019
Q3 Jan. 1 - Mar. 31	Q4 - ByPass April 1 - June 30
Open Bids: 2/7/2020 Permit Approved: 2/14/2020 FDD to SRF: 3/3/2020 Closing Docs to SRF: 3/10/2020 Last Q3 Preclose: 3/17/2020 Last Q3 Close: 3/31/2020	If funds remain, first come, first served

For example, if *Anytown, Indiana* submits a funding application to SRF in April 2019, the project will be scored and ranked as usual. The project will be placed on the PPL, and if located in the fundable range, *Anytown* will have access to the earmarked loan funds, so long as closing occurs on or before March 31, 2020. This means that all loan requirements are due on or before loan closing. If *Anytown* wants to complete a financing in Q1, Q2, or Q3, the community must provide a letter committing to meet, at a minimum, the dates outlined in the above-table.

Please contact Bill Harkins at wharkins@ifa.in.gov or (317) 234-4862 with any questions.

* These deadlines are the last possible dates to complete these items for financing within the quarter. SRF encourages borrowers to complete these items well in advance of the dates listed.