



November 12, 2025

Mayor Guy Titus
Board of Public Works and Safety
10 South State Street
Greenfield, IN 46140

Re: Wastewater Utility – Industrial Pretreatment Program

Mayor and Board Members,

The Wastewater Utility was notified by the EPA on September 9, 2025 that we will need to develop an Industrial Pretreatment Program (IPP). While we currently have an IPP, it is controlled by the IDEM as a non-delegated program. This notification from the EPA will delegate the Control Authority to the Wastewater Utility and all permits, inspections, etc. will be administered by the Utility.

There are 7 major aspects that we will need to address over the next year in order to comply with this order. While most of the requirements will be able to be addressed by Utility staff, we will likely need some assistance on the regulatory requirements, data analysis, and the establishment of local discharge limits requirement to incorporate into our sewer use ordinance. Commonwealth Engineers, Inc. has previously assisted with our industrial pretreatment requirements and NPDES permitting. I asked them to provide the attached task order to assist with the requirements set forth by the EPA. Their proposed total, not to exceed amount is \$50,000. It is my recommendation that this task order be approved as a not to exceed amount of \$25,000.

At this time, I am requesting that the Board approve Task Order 2025-03 with Commonwealth Engineers, Inc. in the total amount, not to exceed \$25,000. I have included the task order, the letter from the EPA, and our initial response letter to the EPA for your review. Please let me know if there are any questions or if any other information is needed at this time.

Best Regards,

Nicholas Dezelan, CHMM, ASP
Wastewater Utility Manager

Wastewater Utility
302 East Davis Road: Greenfield, Indiana 46140
nicholas.dezelan@greenfieldin.gov
Phone 317-477-4360 Fax 317-477-4361

This is CEI Task Order No. 2025-03,
consisting of 4 pages.

Task Order

In accordance with Paragraph 1.01 of the Agreement Between Owner and Engineer for Professional Services – Task Order Edition, dated August 13, 2019 ("Agreement"), Owner and Engineer agree as follows:

1. Background Data

- A. Effective Date of Task Order: _____
- B. Owner: City of Greenfield, IN
- C. Engineer: Commonwealth Engineers, Inc.
- D. Specific Project (title): Delegated Industrial Pretreatment Program Development Assistance
- E. Specific Project (description): Assist the City Wastewater Department staff with preparation of documents requested by the United States Environmental Protection Agency (USEPA) and associated activities included in the attached USEPA letter dated September 9, 2025, and the City's response, inclusive of a schedule, dated October 9, 2025.

2. Services of Engineer

A. Other Services

Engineer shall also provide the following services: As described in item 1.E above.

- B. All of the services included above comprise Basic Services for purposes of Engineer's compensation under this Task Order.

3. Owner's Responsibilities

Owner shall have those responsibilities set forth in Article 2 of the Agreement and in Exhibit B, subject to the following: N/A

4. Task Order Schedule

In addition to any schedule provisions provided in Exhibit A or elsewhere, the parties shall meet the following schedule: Per the attached City of Greenfield letter to USEPA dated October 9, 2025.

5. Payments to Engineer

A. Owner shall pay Engineer for services rendered under this Task Order as follows:

Description of Service	Amount	Basis of Compensation (Lump Sum or Hourly Rates)
1) Basic Services (Part 1 of Exhibit A)		
a. Other Services (see A1.08, and 2.D above)	\$50,000.00	Hourly NTE

Compensation items and totals based in whole or in part on Hourly Rates are estimates only. Lump sum amounts and estimated totals included in the breakdown by phases incorporate Engineer's labor, overhead, profit, reimbursable expenses (if any), and Consultants' charges, if any. For lump sum items, Engineer may alter the distribution of compensation between individual phases (line items) to be consistent with services actually rendered, but shall not exceed the total lump sum compensation amount unless approved in writing by the Owner.

B. The terms of payment are set forth in Article 4 of the Agreement and in the applicable governing provisions of Exhibit C.

6. Consultants retained as of the Effective Date of the Task Order: N/A

7. Other Modifications to Agreement and Exhibits:

a. Article 8.05, "Engineer's Certifications", of the Agreement is hereby amended to include the following:

"B. Pursuant to Indiana Code 22-5-1.7-11, the Engineer entering into this Agreement with the Owner is required to enroll in and verify the work eligibility status of all its newly hired employees through the E-Verify program. The Engineer is not required to verify the work eligibility status of all its newly hired employees through the E-Verify program if the E-Verify program no longer exists.

The Engineer hereby certifies to the Owner that the Engineer does not knowingly employ an unauthorized alien. The Engineer further affirms that, prior to entering into its Agreement with the Owner, the Engineer has enrolled in and agrees to verify the work eligibility status of all its newly hired employees through the E-Verify program.

The Engineer shall provide to Owner a sworn affidavit on an annual basis or as requested by the Owner.

C. Pursuant to Executive Order 13846, the Engineer hereby certifies to Owner that Engineer is not engaged in Investment Activities in Iran."

8. Attachments:

- Commonwealth Engineers, Inc., Standard Hourly Rates and Reimbursable Expenses Schedule, July 1, 2025 – June 30, 2026.
- USEPA Delegated Program Letter and Schedule dated September 9, 2025.
- City's Letter of Response, inclusive of a schedule, dated October 9, 2025.

9. Other Documents Incorporated by Reference: Exhibits A, B and C

10. Terms and Conditions

Execution of this Task Order by Owner and Engineer shall make it subject to the terms and conditions of the Agreement (as modified above), which Agreement is incorporated by this reference. Engineer is authorized to begin performance upon its receipt of a copy of this Task Order signed by Owner.

The Effective Date of this Task Order is _____.

OWNER:
CITY OF GREENFIELD

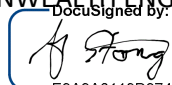
By: _____

Print Name: _____

Title: _____

Date: _____

ENGINEER:
COMMONWEALTH ENGINEERS, INC.

By:  _____
DocuSigned by: E3A3A0119D374E3...

Print Name: Albert C. Stong, P.E.

Title: President

Date: 10/17/2025

Engineer License or Firm's
Certificate No. (if required): 10201336

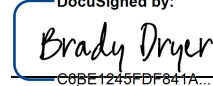
State of: Indiana

Attest:

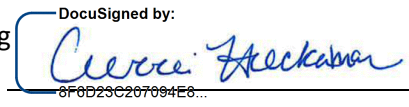
By: _____

Title: _____

Attest:

By:  _____
DocuSigned by: C0BE1245FDF841A...

Title: Partner/Environmental Compliance Mgr.

CFO/Accounting
Approval:  _____
DocuSigned by: 8F0D29C207094E6...

DESIGNATED REPRESENTATIVE FOR TASK ORDER:

Name: Nicholas Dezelan, CHMM, ASP

Title: Wastewater Utility Manager

Address: 809 South State Street

Greenfield, IN 46140

E-Mail Address: ndezelan@greenfieldin.org

Phone: _____

DESIGNATED REPRESENTATIVE FOR TASK ORDER:

Name: Brady M. Dryer

Title: Partner/Environmental Compliance Mgr.

Address: 6325 Digital Way, Suite 101

Indianapolis, In 46278

E-Mail Address: bdryer@contactcei.com

Phone: (463) 900-1177

COMMONWEALTH ENGINEERS, INC.
STANDARD HOURLY RATES AND REIMBURSABLE EXPENSES SCHEDULE
July 1, 2025 – June 30, 2026

Billing Class	Rate Per Hour	Billing Class	Rate Per Hour
Principal III	\$ 126.20	Environmental Scientist II	\$ 38.64
Principal II	\$ 115.80	Environmental Scientist I	\$ 34.81
Principal I	\$ 105.85		
		Construction Manager	\$ 66.23
Project Manager IV	\$ 104.76		
Project Manager III	\$ 98.01	Resident Project Representative IV	\$ 52.52
Project Manager II	\$ 79.93	Resident Project Representative III	\$ 43.67
Project Manager I	\$ 71.96	Resident Project Representative II	\$ 39.42
		Resident Project Representative I	\$ 35.15
Senior Electrical Engineer	\$ 98.01		
		Clerical III	\$ 43.68
Senior Process Engineer	\$ 86.70	Clerical II	\$ 32.87
		Clerical I	\$ 24.11
Project Engineer IV	\$ 81.37		
Project Engineer III	\$ 65.27	Reproduction Processor	\$ 30.14
Project Engineer II	\$ 61.47		
Project Engineer I	\$ 56.99	Trainee	\$ 23.42
Engineering Intern III	\$ 50.66	CADD Specialist IV	\$ 49.56
Engineering Intern II	\$ 47.64	CADD Specialist III	\$ 45.03
Engineering Intern I	\$ 42.97	CADD Specialist II	\$ 38.51
		CADD Specialist I	\$ 30.84
Designer IV	\$ 63.09		
Designer III	\$ 57.77	Chief Technology Officer	\$ 73.68
Designer II	\$ 52.12	IT Tech	\$ 34.40
Designer I	\$ 42.07	Multimedia Coordinator	\$ 58.47
Operations Specialist	\$ 51.31	Survey Manager	\$ 67.49
		Surveyor	\$ 53.15
		Project Surveyor	\$ 47.98
		Field Technician	\$ 40.62
Environmental Compliance Manager	\$ 62.19		
Compliance Specialist	\$ 34.81	Grants Manager	\$ 66.98

In order to arrive at the total billing rate, the above direct payroll rates shall be multiplied by factors of 56.4556% and 87.4236% to account for payroll and general overhead costs respectively. In addition, a 15% profit level is then added to arrive at total labor costs. This is a total multiplier factor of 3.3722 times direct payroll rates.

Reimbursable Expenses

1. Travel: Starts at the office and shall be at the then approved rate by the U.S. Internal Revenue Service, plus 15% profit.
2. Subsistence and Lodging: Actual Cost, plus 15% profit.
3. Express Charges and Postage, other than first class mail: Actual Cost, plus 15% profit.
4. Paper Prints: \$0.75 per square foot, plus 15% profit.
5. Special Tests and Services of Special Consultants: Actual Costs, plus 15% profit.

It is agreed that the Owner will make payment of each invoice presented by Commonwealth within thirty (30) days from the date of the invoice. Payments received after this time shall be subject to an interest charge of 1% per month.



REGION 5

CHICAGO, IL 60604

September 9, 2025

Nicholas Dezelan, CHMM, ASP
Wastewater Utility Manager
City of Greenfield
809 South State Street
Greenfield, Indiana 46140
ndezelan@greenfieldin.org

Re: Requirement to Develop an Industrial Pretreatment Program – City of Greenfield
Wastewater Utility - IN0020109

Dear Mr. Dezelan:

I write to inform that the City of Greenfield needs to develop a “pretreatment program” for non-domestic users of the City’s Publicly-owned Treatment Works (POTW).

The General Pretreatment Regulations found at [40 C.F.R. § 403.8](#) require POTWs with a total design flow greater than five million gallons per day (MGD) and that receive pollutants from industrial users which could pass through or interfere with operation of the POTW, or are otherwise subject to Pretreatment Standards, to develop a POTW Pretreatment Program.

The U.S. Environmental Protection Agency understands that the design flow of the Greenfield POTW will be eight MGD this fall. The City also reports that it has multiple industrial users and at least four categorical industrial users (CIUs) which include:

1. Hitachi Astemo Indiana, Inc. ([40 C.F.R. Part 433 Metal Finishing](#))
2. Indiana Automotive Fasteners, Inc. ([40 C.F.R. Part 433 Metal Finishing](#))
3. Job Shop Coatings, Inc. ([40 C.F.R. Part 433 Metal Finishing](#))
4. Precoat Metals Corporation ([40 CFR Part 465 Coil Coating](#))

As the total design flow of the City’s POTW will be greater than 5 MGD, and the POTW accepts pollutants from categorical industrial users, EPA concludes and is providing notice that the City of Greenfield must develop and submit an approvable pretreatment program pursuant to [40 C.F.R. § 403.8\(e\)](#).

There are seven major aspects of an approvable pretreatment program, as follows:

1. Industrial Waste Survey
2. Local Limits Development
3. Enactment of Legal Authority – Documentation including copies of Ordinances, Resolutions, Interjurisdictional Agreements and Legal Counsel Statement
4. Description of Treatment Plant, Plant Performance, and Industrial Waste History
5. Description of Program Implementation Procedures
6. Description of Compliance Monitoring Program
7. Description of Program Organization, Costs, and Funding

The enactment of the legal authority to enforce the program throughout the entire service area is generally the most time-consuming element in developing an approvable program. Therefore, EPA recommends that the City submit copies of any existing ordinances or regulations that regulate discharges from non-domestic users, including those located in contributing municipalities, and any existing Interjurisdictional Agreements, as early as possible so that EPA can begin this review.

In addition, the necessary sampling and analysis for development of technically-based local limits requires a significant amount of time and should be initiated as soon as possible.

In accordance with [40 C.F.R. § 403.8\(b\)](#), the City will have one year to develop and submit an approvable pretreatment program. To assist with developing an approvable program we provide the following web addresses:

- [General Pretreatment Regulations, 40 C.F.R. Part 403](#)
- [Guidance Manual for POTW Pretreatment Program Development](#)
- [EPA Model Ordinance](#)
- [Local Limits Development Guidance](#)
- [Local Limits Spreadsheet](#)

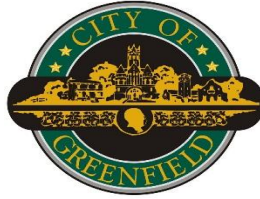
Within 30 days of receipt of this letter, EPA requests the City submit to EPA a schedule to accomplish completion and submittal of the program elements discussed above. We recommend that as each element of the program is completed, a copy be submitted to EPA to facilitate the review of that element. Doing so will allow EPA to provide you with timely feedback to facilitate development of an approvable program.

My team and I look forward to cooperating with you to establish an approvable program. If there are any questions, please contact Karly McMorrow at 312-353-3126 or mcmorrow.karly@epa.gov.

Sincerely,

D. Scott Ireland
Acting Director, Water Division

cc: Mary Armacost, IDEM, marmacos@idem.in.gov
Brady Dryer, Commonwealth Engineers, Inc., bdryer@contactcei.com
Allen J Humerickhouse, City of Greenfield, ahumerickhouse@greenfieldin.org



October 9, 2025

Darren Ireland - Acting Director
United States Environmental Protection Agency
Water Division
77 West Jackson Boulevard
Chicago, IL 60604-3507

Re: Industrial Pretreatment Program Development Schedule

Dear Mr. Ireland:

This letter is intended to serve as a response to the notice from the United States Environmental Protection Agency (EPA) Water Division on September 9, 2025. In this letter, it was stated that the City of Greenfield Wastewater Utility (NPDES Permit No. IN0020109) is required to develop a "pretreatment program" for non-domestic users of the City's Publicly Owned Treatment Works (POTW).

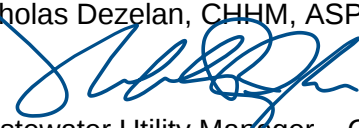
As stated in the letter, the City of Greenfield Wastewater Utility has one (1) year to develop and submit an approvable pretreatment program. Additionally, the City is required to submit a schedule to accomplish completion and submittal of the seven (7) major aspects required by EPA for a pretreatment program within 30 days of the receipt of the letter.

Utilizing EPA guidance, a schedule for developing and submitting an approvable pretreatment program containing the seven (7) major aspects identified in the initial correspondence was created and is attached to this letter. These dates represent targets and may be subject to change.

Thank you for your attention to this letter. Should you have any questions or concerns please feel free to contact our consultant, Brady Dryer, Commonwealth Engineers, Inc. at 800-289-1177 or by email at bdryer@contactcei.com.

Sincerely,

Nicholas Dezelan, CHHM, ASP


Wastewater Utility Manager – City of Greenfield

CC: Allen J Humerickhouse – City of Greenfield
Commonwealth Engineers, Inc.

Wastewater Utility
302 East Davis Road: Greenfield, Indiana 46140
wwtp@greenfieldin.org
Phone 317-477-4360 Fax 317-477-4361

Program Aspect	Target Completion Date
1. Industrial Waste Survey	February 2026
Compile a master list of potential industrial users located in the POTW service area Survey each of the industries to collect necessary information Conduct follow-up activities, where needed, to obtain complete and accurate information Summarize the data for use in developing the pretreatment program	
2. Local Limits Development	August 2026
Background monitoring data acquisition Complete EPA Local Limit Spreadsheet & Prepare Evaluation Memo EPA Correspondence Local Adoption of Limits	
3. Enactment of Legal Authority	August 2026
Development of Sewer Use Ordinance & Enforcement Response Plan EPA Correspondence Adoption of Sewer Use Ordinance & Enforcement Response Plan	
4. Description of Treatment Plant, Plant Performance, and Industrial Waste History	August 2026
Compile descriptive background information about the POTW and its service area Existing POTW performance data for conventional, nonconventional, and priority pollutants Compile data on the sampling and analysis performed at the treatment plant and at the industries Compile limitations placed on POTW's effluent and sludge List methodology for determining local effluent limitations	
5. Description of Program Implementation Procedures	April 2026
Develop Templates for Industrial User Permit Applications & Permits Develop Industrial User Surveys Develop Industrial User Random Sampling Procedure Develop Industrial User Annual Report Template	
6. Description of Compliance Monitoring Program	June 2026
Develop a Compliance Monitoring Checklist Develop Monitoring Forms & Schedule Develop Inspection Forms & Schedule	
7. Description of Program Organization, Costs, and Funding	August 2026
Summarize Funding Levels for Full & Part Time Employees for Implementation of Program Develop Organizational Chart for Pretreatment Program Implementation	