



January 24, 2023

Mayor Chuck Fewell
Board of Public Works and Safety
10 South State Street
Greenfield, IN 46140

Re: WWTP Improvements Project – Commonwealth PSA Amendment #6: Davis Road Disposal Area and WWTP Closed Open Dump Closure Requirements

Mayor and Board Members,

The Indiana Department of Environmental Management Office of Land Quality has requested additional site investigations to determine the extent of the “Closed/Open” Dump at the location of the WWTP Improvements Project. They have also asked for the City to investigate the Davis Road Disposal Area located at 400 East Davis Road as they believe it to also be a former dump site that ceased operation when dumping activities at the WWTP site started. The vast majority of the site investigation at the WWTP site has been completed, but IDEM has requested that some additional work be done to the east and north of the WWTP. However, no site investigations have been completed at the Davis Road Disposal Area.

In order for both sites to be officially closed, the following will need to be completed:

1. Waste Boundary Delineation
 - a. WWTP site has been submitted for approval, but IDEM has requested more information as outline in the report response from IDEM and the memo from Commonwealth Engineers, Inc.
 - b. Full site delineation will need to be completed for the Davis Road Disposal Site
2. Landfill cover requirements
 - a. Minimum of a 2 foot thick clay cap or other impermeable surface
3. Groundwater monitoring plan
 - a. Will require a minimum of 8 sampling events
4. Environmental Restrictive Covenant

During the course of the Excavation, Regrading, and Disposal project that was completed in the fall of 2021, approximately 12,000 cubic yards of soils were stockpiled near the current construction site to hopefully be able to be used for future backfill or final cover. Close to half of the stockpiled soils can only be used as a subsurface cover or disposed of in a landfill.

As a potential cost savings to the City, IDEM has verbally agreed to allow us to use this soil as base layer for the cover cap that will be required for either the Davis Road Disposal area or the WWTP “Closed/Open” dump or both. In order to do this, we will need to establish the limits of

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the waste area at both sites and submit a grading plan and Stormwater control plan to the Office of Land Quality for their review and approval.

Commonwealth Engineers, Inc. has provided the attached memorandum outlining their proposal to get this work completed. The breakdown of their fees is as follows:

Description	Cost
WWTP Waste Boundary Delineation	\$ 26,545.00
Landfill Cover Coordination	\$ 5,845.00
Groundwater Monitoring Plan (WWTP Site)	\$ 9,870.00
Davis Road Disposal Area Support	\$ 55,200.00
	Subtotal \$ 97,460.00
	Contingency (10%) \$ 9,500.00
	Total \$106,960.00

Since we do not know exactly what additional work will be required by IDEM at the WWTP site, Commonwealth has provided these estimates as Not-to-Exceed values. I would also like to add that the WWTP Waste Boundary Delineation work will require a Notice-to-Proceed from the City once we have final direction from IDEM as to what additional investigative work is required at the WWTP site.

At this time, I am requesting that the Board approve the proposal from Commonwealth Engineers, Inc. in the total amount, Not-to-Exceed \$106,960.00. Copies of the memorandum from Commonwealth Engineers, Inc., the response from IDEM requesting the additional work at the WWTP site and the work at the Davis Road Disposal site, and the proposed Commonwealth PSA Amendment #6 have been included 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

cc: Gregg Morelock – City Attorney
Jane Webb – Utility Coordinator

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