west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street, SE
Charleston, WV 25304
Phone: 304-926-0495 / Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary
dep.wv.gov

MEMORANDUM

To: Water Development Authority
Meredith J. Vance, Director, Environmental Engineering Division, BPH

From: Katheryn Emery, P.E., Program Manager
Sewer Technical Review Committee

Date: July 20, 2026

Subject: Clarksburg Water Board
IJDC Application - 2026W-2788
Lumberport Interconnection and Water System Improvements Project

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1. This committee has reviewed the preliminary application and engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15A. It has been determined that the proposed project is:

   a. √ Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective, environmentally sound alternative for solving the water needs in this area.

   b. __ Not consistent with the Act and may not be the most cost effective, environmentally sound alternative for solving the wastewater needs in this area.

   c. __ Same as (a) above except that certain issues need to be addressed prior to design and construction as the attached comments indicate.

2. Our recommendation is that:

   a. √ The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.

   b. __ The Funding Committee should recommend that the Council approve the proposed project and its funding plan.

c. ___ The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the engineering report. The proposed project should be tabled for the consultant to address technical comments.

d. ___ This project should be referred to the Consolidation Committee.

3. Other remarks:

The proposed project would create an interconnection with the Clarksburg Water Board system and the Town of Lumberport, eliminating the Town's treatment system while maintaining the existing Town storage and distribution system. The Town would remain an independent public water system while becoming a purchase based system for treated drinking water. The project would also interconnect with the City of Shinnston to serve customers and eliminate a river crossing.

The proposed total cost for this project is $5,000,000 and City intends to pursue a $2,000,000 DWTRF Loan (0.75%, 0.25% admin fee, 30 years), a $1,500,000 DWTRF Principal Forgiveness Loan, a $900,000 WDA Economic Enhancement Grant, $100,000 local contribution, and a $500,000 IJDC grant.

This project appears to only qualify for a maximum of $1,000,000 Principal Forgiveness Loan. The DWTRF loan portion will need to be increased by $500,000.

<u>Preliminary Project Ratings:</u>
Public Health Benefits: 5
Compliance with Standards: 15

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MEMORANDUM

TO: Katheryn Emery, P.E., Program Manager, DWWM

FROM: Daniel Bailey, E.I., CFM, DWWM

DATE: July 8, 2026

SUBJECT: Clarksburg Water Board
IJDC Application - 2026W-2788
Lumberport Interconnection and Water System Improvements Project

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RECOMMENDATION

The Preliminary Engineering Report (PER) and IJDC Application prepared by The Thrasher Group, Inc. for the above referenced project has been reviewed and is technically feasible.

PROJECT DESCRIPTION

The Clarksburg Water Board (Board) owns and operates a large regional public water supply system serving over 7,000 customers in Harrison County, WV, under PWSID WV3301705. The system sources raw water from the West Fork River and includes treatment facilities, redundant supply capacity, and established operational controls. The current system is independent of the Town of Lumberport which operates a public water system under PWSID WV33001714. Lumberport is located approximately six miles north of Clarksburg. The Lumberport system consists of a treatment plant, two storage tanks, and distribution lines serving the town and surrounding area.

The proposed project would create an interconnection with the Clarksburg Water Board system and the Town of Lumberport, eliminating the Town's treatment system while maintaining the existing town storage and distribution system. The Town would remain an independent public water system while becoming a purchase based system for treated drinking water. This line includes construction of approximately 6,100 LF of water main along with upgrades to the existing infrastructure including replacement of undersized water mains, installation of a check valve, and associated appurtenances. The project would also interconnect with the City of Shinniston to serve customers, eliminating a river crossing.

The proposed total cost for this project is $5,000,000 and City intends to pursue a $2,000,000 DWTRF Loan (0.75%, 0.25% admin fee for 30 years), a $1,500,000 DWTRF Principal Forgiveness Loan, a $900,000 WDA Economic Enhancement Grant, $100,000 local contribution, and a $500,000 IJDC grant. The current monthly rate for 3,400 gallons is $75.88 (1.90% MHI) with no project rate increase. (Rates based on Lumberport tariff using the 2025 Census Lumberport MHI.)

NEED FOR PROJECT

The Town of Lumberport's public water system is currently experiencing a combination of infrastructure, operational, and regulatory challenges that collectively affect the long-term reliability and sustainability of potable water service. These challenges are not the result of a single isolated deficiency, but rather reflect the cumulative impacts of aging facilities, limited system redundancy, increasing regulatory requirements, and the inherent constraints associated with operating a small, stand-alone surface water treatment system. The system received significant deficiencies and recommendation from the WV Bureau for Public Health in 2024 as well as multiple Areas of Concern from the USEPA Compliance Advisor in 2022.

While many of the individual issues identified within the Lumberport system could be addressed through targeted improvements or rehabilitation efforts, the overall scale and complexity of the required actions exceed what can reasonably be sustained by the Town's existing operational and financial capacity. Continued reliance on a plant-based treatment approach would require ongoing capital investment, specialized operational expertise, and increased regulatory oversight, all of which place a disproportionate burden on a limited customer base. As a result, the Town faces increasing risk related to long-term compliance, service continuity, and affordability if the existing approach is maintained.

DEFICIENCIES/COMMENTS

- An Intermunicipal Agreement will need to be set up for this project.
- Using the Combined Application, the Design and Total Engineering fees appear to be within the ASCE curve.

Preliminary Project Ratings:
Public Health Benefits: 5
Compliance with Standards: 15

Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812
Charleston, West Virginia 25323

Phone: (304) 340-0300
Fax: (304) 340-0325

June 15, 2026

Brad Sergent, Chair
Water Development Authority, Acting Executive Director
Katheryn Emery, P.E., Program Manager
CWSRF & DWTRF, Division of Water and Waste Management, WVDEP
Meredith Vance, Director
Environmental Engineering Division, WVBPH

Re: Public Service Commission Staff Review Comments
Application No. 2026W-2788
Clarksburg, City of – Lumberport Interconnection
Infrastructure Preliminary Application

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of Technical Staff's comments enclosed herewith, we are recommending the application be:

__X__ Forwarded to the Funding Committee

_____ Forwarded to the Consolidation Committee

_____ Returned to the Applicant

Please advise if you have any questions.

Sincerely,

Brandon Crace

Brandon Crace
Engineering Division

Enclosures

PUBLIC SERVICE COMMISSION STAFF
TECHNICAL REVIEW

DATE: June 15, 2026

PROJECT SPONSOR: **CLARKSBURG WATER BOARD – (WATER)**

PROJECT SUMMARY: The Clarksburg Water Board is proposing to establish an interconnection with the Town of Lumberport and provide the Town with finished water, via master meter.

PROPOSED FUNDING:

DWTRF Principal Forgiveness	1,500,000
DWTRF Loan (.75%, .25% AF, 30 yrs.)	2,000,000
WDA EE Grant	900,000
IJDC Grant	500,000
Local/City Contribution	100,000
Total	$5,000,000

CURRENT/PROPOSED RATES:

$36.99	3,400 gallons
$43.52	4,000 gallons

Application No. 2026W-2788

RECOMMENDATION:
__X__ Forward to the Funding Committee
____ Forward to the Consolidation Committee
____ Return to the Applicant

FINANCIAL: William Nelson

1. Current rates ($36.99 for 3,400 gallons) are below the rates attributable to 1.25% ($55.57), 1.5% ($66.68), 1.75% ($77.79), and 2% ($88.91) of the Median Household Income (MHI). Increasing current rates to 1.25%, 1.5%, 1.75%, and 2.0% of the MHI would provide additional revenue of $2,806,238, $4,485,109, $6,163,980, and $7,842,851 respectively.

2. Using Scenario 1, the preferred funding package consisting of an IJDC Grant of $500,000, a DWTRF Principal Forgiveness Loan of $1,500,000, a DWTRF Loan of $2,000,000 at .75%, .25% Admin. Fee, for 30 years, a WDA Economic Enhancement Grant of $900,000, and a Local/City Contribution of $100,000, proposed rates ($36.99 for 3,400 gallons) will provide a cash flow surplus of $1,693,780 and debt service coverage of 323.64%.

3. Using the Scenario 2 alternate loan package of $5,000,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rates ($36.99 for 3,400 gallons) will provide a cash flow surplus of $1,452,496 and debt service coverage of 277.10%.

4. NOTES TO COMMENTS

   A. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package), Attachment B for Scenario 2 (Loan Package) and Attachment C for Scenario 3 (Loan Package).

   B. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2025, and the applicant's Cash Flow Statement submitted with the application.

   C. Staff notes, since there is no rate increase, the Applicant is requesting a waiver of Rule 42 Exhibit requirement.

   D. Staff also notes, the Applicant used the MHI of $53,343 for Harrison County's Northern District, given that is where the project (Lumberport) is located, rather than the MHI for Clarksburg of $41,226. Staff reflected this MHI in its analyses.

   E. Staff has included a Scenario 3 analysis. Staff notes that the project sponsor is proposing a DWTRF Loan at .75%, .25% Administrative Fee, for 30 years. Since proposed target rates of $36.99 (3,400 gallons) are less than 1.5% of MHI ($66.68), the terms of this proposed DWTRF loan would typically be 2.75%, .25% Administrative Fee, for 20 years, for the preferred funding package. If the preferred funding package is adjusted for this change, proposed target rates ($36.99 for 3,400 gallons) would provide a cash flow surplus of $1,631,441 and debt service coverage of 310.26%.

   F. Senate Bill 234, effective June 12, 2015, required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General

Order 183.11.

G. The Clarksburg Water Board (City) should carefully evaluate its revenue requirements before passing a rate ordinance in order to ensure that rates are sufficient to provide a reasonable surplus and meet coverage requirements. Staff notes that the City is a political subdivision of the state and it has at least 4,500 customers and annual gross revenues of $3 million or more. Therefore, in accordance with Senate Bill 234, effective June 12, 2015, the Commission has no jurisdiction regarding the City's rates pursuant to WV Code 24-2-4b. However, the Commission does have jurisdiction pursuant to WV Code 24-2-1 (b)(6) for the investigation and resolution of disputes involving political subdivisions of the state regarding inter-utility agreements, rates, fees and charges, service areas and contested utility combinations.

ENGINEERING: Brandon Crace

1. Pursuant to House Bill 2742 passed in the 2025 Legislative Session, this project will not require a Certificate of Convenience and Necessity from the PSC.

2. Scope: The Clarksburg Water Board (City of Clarksburg) is proposing to establish an interconnection with the Town of Lumberport and provide the Town with finished water via a master meter. The proposed project scope includes: mobilization, demobilization, erosion and sediment control measures, 6100 LF of 6-inch PVC water main pipe, 12100 LF of 8-inch PVC water main pipe, 6000 LF of 10-inch PVC water main pipe, 100 LF of 16-inch steel casing (bore & jack) including 8-inch water main pipe, 210 LF of horizontal directional drill 16-inch HDPE casing with 8-inch water main pipe, 100 LF of 12-inch steel casing (bore & jack) including 6-inch water main pipe, 40 LF of 6-inch steel casing (bore & jack) including 2-inch water main pipe, 80 LF of concrete repair, 700 LF of stone trench repair, 150 LF of asphalt pavement repair, 12350 LF of WVDOH rock-lined ditch, tie into existing 2-inch waterline, 2 tie into existing 6-inch waterline, 4 tie into existing 8-inch waterline, eight (8) 3/4-inch air release valves, 1 check valve, 2 master meters, 2 leak detection meters, 60 customer reconnections, six (6) 6-inch MJ.T. gate valve assemblies (complete), twelve (12) 8-inch MJ.T. gate valve assemblies (complete), six (6) 10-inch MJ.T. gate valve assemblies (complete), 2 fire hydrants, abandon existing river crossing, decommission existing water treatment plant, 11500 LF of restoration of disturbed areas, and all necessary appurtenances. The estimated construction cost is $3,940,000 (includes 15.27% construction contingency),

and the estimated total project cost is $5,000,000.

Need: The PER states that Lumberport's water system is facing constraints associated with operating a surface water treatment plant with a small customer base, including: aging facilities, limited redundancy, increasing regulatory requirements, specialized operational expertise, etc.

Cost per Customer: Based upon the estimated total project cost is $5,000,000, and having approximately 7832 existing customers (including 14 resale customers/utilities) and 1 proposed [Lumberport]), the cost per customer will be approximately $639. However, the cost per customer in terms of proposed borrowing is $256, as the proposed funding is 60% grant.

3. Project Alternatives: The PER evaluated five (5) alternatives: Alternative #1 – Enlarged Hepzibah PSD Interconnection, Alternative #2 – Clarksburg Water Board Interconnection, Alternative #3 – City of Shinnston Interconnection, Alternative #4 – Water Treatment Plan Rehabilitation, and Alternative #5 – Do Nothing. The PER indicates that Alternative #2 "…provides the most sustainable balance of reliability, regulatory compliance, and financial feasibility while preserving Lumberport's independence and protecting its customer from undue economic hardship.", and this alternative allows the required loan financing to be carried by Clarksburg and its larger customer base, which lessens the financial burden imposed on Lumberport's customers.

4. Consolidation: The PER did provide an evaluation of purchasing finished water from all water utilities adjacent to the Town of Lumberport.

5. Operation and Maintenance (O&M) Expenses: The PER did include a detailed breakdown of anticipated changes to O&M. The PER indicates an anticipated annual *decrease* of $4,743 to O&M expenses related to the selected alternative.

6. Engineering Agreement: The application includes information to determine compliance with West Virginia Code §5G-1-1, *et seq*. Total technical services (engineering) costs for the project are $675,000, which is equal to 17.13% of the construction cost of $3,940,000 (includes 15.27% construction contingency).

7. Deficiencies/Comments:
   - Nothing significant to note.

CLARKSBURG WATER BOARD - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2788
June 15, 2026

PREFERRED FUNDING PACKAGE
SCENARIO 1

		Cash Flow Going Level Per Application Before Project	Cassh Flow Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		10,374,713	10,593,713	(884,756)	(1)	9,708,957
Other Operating Revenue		430,889	430,889	-		430,889
SB 234 Annual Working Cash Collections				884,756	(2)	884,756
Interest Income & Other Misc.		478,852	478,852	-		478,852
Total Cash Available		11,284,454	11,503,454	-		11,503,454
OPERATING DEDUCTIONS						
Operating Expenses		6,993,103	6,993,103	2,613	(3)	6,995,716
Taxes		253,449	253,449	-		253,449
Total Cash Requirements Before Debt Service		7,246,552	7,246,552	2,613		7,249,165
Cash Available for Debt Service	(A)	4,037,902	4,256,902	(2,613)		4,254,289
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	1,239,830	1,317,023	(2,497)	(4)	1,314,526
Other Debt		-	-	-		-
Reserve Account @ 10%		100,261	107,980	(249)	(5)	107,731
Renewal & Replacement Fund (2.5%)		270,140	275,615	(22,119)	(6)	253,496
Total Debt Service Requirement		1,610,231	1,700,618	(24,865)		1,675,753
SB 234 Cash Working Capital		884,756	884,756	-		884,756
Remaining Cash		1,542,915	1,671,528	22,252		1,693,780
Percent Coverage	(A) / (B)	325.68%	323.22%			323.64%
Average rate for 3,400 gallons		$ 36.99	$ 36.99	$ -		$ 36.99
Average rate for 4,000 gallons		$ 43.52	$ 43.52	$ -		$ 43.52

CLARKSBURG WATER BOARD - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2788

Attachment A
PREFERRED FUNDING PACKAGE
SCENARIO 1

Staff Adjustments

	Adjustment Description		$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**9,708,957**	**(884,756)**
		Per Application with Project	**10,593,713**	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**884,756**	**884,756**
		Per Application with Project	**-**	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	**Operating Expenses**	**Per Staff Analysis**	**6,995,716**	**2,613**
		Per Application with Project	**6,993,103**	
	Staff's calculation reflects the difference in amount of administrative fees for two DWTRF loans.			
(4)	**Principal & Interest**	**Per Staff Analysis**	**1,314,526**	**(2,497)**
		Per Application with Project	**1,317,023**	
	The difference in P&I is related to Staff's calculation of a DWTRF loan of $2,000,000 for 30 years at .75%.			
(5)	**Reserve Account @ 10%**	**Per Staff Analysis**	**107,731**	**(249)**
		Per Application with Project	**107,980**	
	Staff assumed a 10% reserve on the new debt.			
(6)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**253,496**	**(22,119)**
		Per Application with Project	**275,615**	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

CLARKSBURG WATER BOARD - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2788
June 15, 2026

LOAN PACKAGE
SCENARIO 2

		Max Rate Going Level Per Application Before Project	Max Rate Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		10,374,713	10,593,713	(884,756)	(1)	9,708,957
Other Operating Revenue		430,889	430,889	-		430,889
SB 234 Annual Working Cash Collections				884,756	(2)	884,756
Interest Income & Other Misc.		478,852	478,852	-		478,852
Total Cash Available		11,284,454	11,503,454	-		11,503,454
OPERATING DEDUCTIONS						
Operating Expenses		6,993,103	6,993,103	-		6,993,103
Taxes		253,449	253,449	-		253,449
Total Cash Requirements Before Debt Service		7,246,552	7,246,552	-		7,246,552
Cash Available for Debt Service	(A)	4,037,902	4,256,902	-		4,256,902
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	1,239,830	1,529,148	7,103	(3)	1,536,251
Other Debt		-	-	-		-
Reserve Account @ 10%		100,261	129,193	710	(4)	129,903
Renewal & Replacement Fund (2.5%)		270,140	275,615	(22,119)	(5)	253,496
Total Debt Service Requirement		1,610,231	1,933,956	(14,306)		1,919,650
SB 234 Cash Working Capital		884,756	884,756	-		884,756
Remaining Cash		1,542,915	1,438,190	14,306		1,452,496
Percent Coverage	(A) / (B)	325.68%	278.38%			277.10%
Average rate for 3,400 gallons		$ 36.99	$ 36.99	$ -		$ 36.99
Average rate for 4,000 gallons		$ 43.52	$ 43.52	$ -		$ 43.52

CLARKSBURG WATER BOARD - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2788

Attachment B
LOAN PACKAGE
SCENARIO 2

Staff Adjustments

Adjustment Description			$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**9,708,957**	**(884,756)**
		Per Application with Project	**10,593,713**	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**884,756**	**884,756**
		Per Application with Project	**-**	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	**Principal & Interest**	**Per Staff Analysis**	**1,536,251**	**7,103**
		Per Application with Project	**1,529,148**	
	The difference in P&I is related to Staff's calculation of a loan of $5,000,000 for 40 years (paid back over 38 years) at 5%.			
(4)	**Reserve Account @ 10%**	**Per Staff Analysis**	**129,903**	**710**
		Per Application with Project	**129,193**	
	Staff assumed a 10% reserve on the new debt.			
(5)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**253,496**	**(22,119)**
		Per Application with Project	**275,615**	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

CLARKSBURG WATER BOARD - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2788
June 15, 2026

PREFERRED FUNDING PACKAGE
SCENARIO 3

		Cash Flow Going Level Per Application Before Project	Cash Flow Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		10,374,713	10,593,713	(884,756)	(1)	9,708,957
Other Operating Revenue		430,889	430,889	-		430,889
SB 234 Annual Working Cash Collections				884,756	(2)	884,756
Interest Income & Other Misc.		478,852	478,852	-		478,852
Total Cash Available		11,284,454	11,503,454	-		11,503,454
OPERATING DEDUCTIONS						
Operating Expenses		6,993,103	6,993,103	2,640	(3)	6,995,743
Taxes		253,449	253,449	-		253,449
Total Cash Requirements Before Debt Service		7,246,552	7,246,552	2,640		7,249,192
Cash Available for Debt Service	(A)	4,037,902	4,256,902	(2,640)		4,254,262
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	1,239,830	1,317,023	54,150	(4)	1,371,173
Other Debt		-	-	-		-
Reserve Account @ 10%		100,261	107,980	5,415	(5)	113,395
Renewal & Replacement Fund (2.5%)		270,140	275,615	(22,119)	(6)	253,496
Total Debt Service Requirement		1,610,231	1,700,618	37,447		1,738,065
SB 234 Cash Working Capital		884,756	884,756	-		884,756
Remaining Cash		1,542,915	1,671,528	(40,087)		1,631,441
Percent Coverage	(A) / (B)	325.68%	323.22%			310.26%
Average rate for 3,400 gallons		$ 36.99	$ 36.99	$ -		$ 36.99
Average rate for 4,000 gallons		$ 43.52	$ 43.52	$ -		$ 43.52

CLARKSBURG WATER BOARD - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2788

Attachment C
PREFERRED FUNDING PACKAGE
SCENARIO 3

Staff Adjustments

Adjustment Description			$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**9,708,957**	**(884,756)**
		Per Application with Project	**10,593,713**	

Adjust revenues in accordance with PSC General Order 183.11.

(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**884,756**	**884,756**
		Per Application with Project	**-**	

Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.

(3)	**Operating Expenses**	**Per Staff Analysis**	**6,995,743**	**2,640**
		Per Application with Project	**6,993,103**	

To account for Staff's calculation of a 0.25% DWTRF administrative fee.

(4)	**Principal & Interest**	**Per Staff Analysis**	**1,371,173**	**54,150**
		Per Application with Project	**1,317,023**	

The difference in P&I is related to Staff's calculation of a loan of $2,000,000 at 2.75% for a term of 20 years.

(5)	**Reserve Account @ 10%**	**Per Staff Analysis**	**113,395**	**5,415**
		Per Application with Project	**107,980**	

Staff assumed a 10% reserve on the new debt.

(6)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**253,496**	**(22,119)**
		Per Application with Project	**275,615**	

Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.

west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304-2345
Telephone Number: (304) 926-0495
Fax Number: (304) 926-0463

Harold D. Ward, Cabinet Secretary
www.dep.wv.gov

MEMORANDUM

MEMO TO: Meredith J. Vance
Office of Environmental Health Services
Bureau for Public Health

FROM: Brian D. Bailey BB
Technical Analyst
General Permits & Support Team

DATE: May 21, 2026

SUBJECT: Infrastructure Preliminary Application for the Clarksburg Water Board: Lumberport Connection and Water System Improvement Project in Harrison County, WV. (2026W-2788)

We have reviewed the above referenced project application information. The Clarksburg Water Board discharges its backwash to its site, which is covered under WV/NPDES Permit No. WVG640025, and expires July 18, 2028.

If the Clarksburg Water Board is considering repairing and painting an existing water treatment plant or storage tanks, then the scope of this project requires precautions to prevent contamination of the waters of the state. Prior to beginning any removal of old paint, the Clarksburg Water Board should contact Mr. Brad Wright or a member of his staff at (304)-926-0499, extension 49746 for guidance in determining whether the paint to be removed is considered a hazardous waste. If so, proper containment and disposal procedures must be followed for the paint and any material associated with the sandblasting. If it is determined that the paint is not hazardous, the Clarksburg Water Board should contact John Lockhart or a member of his staff at (304)-926-0499, extension 43889 for proper disposal options.

Construction activities with a disturbed area of one (1) acre or greater are now required to register for the NPDES Storm Water Construction General Permit No. WV0115924 that became effective on April 6, 2024. Projects registered under the previous General Permit No. WV0115100 were automatically provided coverage under WV/NPDES General Permit No. WV0115924. For more information, they may contact Larry Board at (304)-926-0499, extension 43883.

In light of the above, we have no objection to this project as long as the appropriate provisions are taken to assure compliance with Chapter 22, Article 11, of the Code of West Virginia and any associated regulations. The responsible party may contact Mylinda Maddox (304) 926-0499 ext. 43825, should additional information be required.

BDB:mam

cc: Katheryn Emery