



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 24, 2014

Mr. Ronald Repp, President
Washington Township Regional Sewer District
P.O. Box 121
New Washington, Indiana 47162

Dear Mr. Repp:

Re: Inspection Summary/ Violation Letter
Washington Township Regional Sewer District
WWTP
NPDES Permit No. IN0109533
New Washington, Clark County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Southeast Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: January 08, 2014
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

Facility/Site was rated as unsatisfactory due to the lack of an alternative power source. This is a violation of Part II. B. 5 of the permit which states, in part, that in order to maintain compliance with the effluent limitations and prohibitions of the permit, the permittee shall either provide an alternative power source or control the discharge in order to maintain compliance with the effluent limits.

The Laboratory evaluation generated an unsatisfactory rating. At the time of the inspection it was determined that the TSS, Ammonia and pH bench sheets were inadequate. This is a violation of Part I. B. 6 of the NPDES permit which states, in part, that the permittee shall record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit. Specifically, the Ammonia and pH bench sheets are lacking all calibration records. Specific information must include all buffers, standards, slope, and millivolt readings. The TSS bench sheets are lacking time in and time out of oven, along with oven temperatures.

Within 30 days of receipt of this letter, a written detailed response documenting correction of each of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in a referral to Office of Water Quality's Enforcement Section. Please direct your response to this letter to the attention of Donald Daily at: Indiana Department of Environmental Management, Office of Water Quality; Mail Code 65-42; 100 North Senate Avenue; Indianapolis, IN 46204-2251. Any questions regarding this matter should be directed to the attention of Brian Smith at 317-650-5122 or by email to bssmith@idem.IN.gov. A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Mark A. Amick".

Mark A. Amick, Deputy Director
Southeast Regional Office

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0109533	Facility Type: Municipality	Minor	Facility Classification: I-SP	TEMPO AI ID 512			
Date(s) of Inspection: January 08, 2014							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: Washington Township Regional Sewer District WWTP 108 PIERCE ST New Washington IN 47162			Receiving Waters: Fourteen Mile Creek	Permit Expiration Date: 9/30/2017 Design Flow: 0.09MGD			
On Site Representative(s): No facility rep was met at the site.							
Was a verbal summary of findings presented to the on-site representative? No							
Certified Operator: Richard Wheeler	Number: 11897	Class: III	Effective Date: 7-1-13	Expiration Date: 6-30-15			
Responsible Official: Mr. Ronald Repp, President			Email: rwheeler@yahoo.com				
P.O. Box 121 New Washington, Indiana 47162			Permittee: Washington Township Regional Sewer District Email: repp.ron@gmail.com Phone: 502-640-3785	Contacted? Yes			
INSPECTION FINDINGS							
<input type="radio"/> No violations were discovered with respect to the particular items observed during the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Potential problems were discovered or observed. (3) <input checked="" type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
AREAS EVALUATED DURING INSPECTION							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
S	Receiving Waters	U	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent Appearance	S	Operations	S	Flow Measurement	N	Pretreatment
S	Permit	S	Maintenance	U	Laboratory	S	Effluent Limits Compliance
S	CSO/SSO (Sewer Overflow)	S	Sludge	S	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
Receiving Waters:							
<u>S</u> 1. The receiving stream is visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam. Comments: The receiving stream was free of notable foam, algae or solids.							
Effluent Appearance:							
<u>S</u> 1. Treated effluent is free of excessive solids, floating debris, oil, scum, or billowy foam. Comments: The effluent was clear and free of color at the time of the inspection.							

Permit:

- S 1. A permit renewal application was submitted to IDEM at least 180 days prior to the expiration date.
- S 2. The facility description, including the receiving waters, is complete and accurate.
- N 3. The permit has been properly transferred.

Comments:

The facility has a valid permit and the facility description, including units of treatment and receiving stream, is accurate.

CSO/SSO:

- N 1. CSO structures are adequately monitored and maintained.
- S 2. The facility has had no unauthorized sewer overflow events in the past 12 months.
- N 3. SSO and dry weather CSO discharges have been properly reported.
- N 4. Any adverse impacts from SSO and CSO discharges have been properly mitigated.

Comments:

No SSO events reported in the past 12 months.

Facility/Site:

- U 1. The facility has standby power or equivalent provision.
- S 2. An adequate alarm or notification system for power or equipment failure is available for the treatment facility.
- S 3. Safe and adequate access is provided for inspection of all treatment units and outfalls.
- 4. List any safety concerns noted during the inspection in the box below:

Comments:

Facility/Site was rated as unsatisfactory due to the lack of an alternative power source. This is a violation of Part II. B. 5 of the permit which states, in part, that in order to maintain compliance with the effluent limitations and prohibitions of the permit, the permittee shall either provide an alternative power source or control the discharge in order to maintain compliance with the effluent limits.

Operations:

- S 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit are operated efficiently, including:
 - a. An anticipated bypass report was submitted to IDEM for steps of treatment taken out of service.
- S 2. An adequate, qualified operating staff is provided to carry out the operation of the facility, including:
 - a. Certified Operator's on-site attendance and/or qualified operations personnel attendance is adequate.
 - b. Adequate documentation of operational activities, including system monitoring and cleaning.
 - c. Adequate funding to ensure proper operation.
- S 3. Solids handling procedures include:
 - a. Sufficient solids are wasted from the treatment system, in a timely manner, to maintain process efficiency.
 - b. Wasting of solids is based on appropriate operational targets and valid process control testing.
 - c. Adequate documentation of solids removal, handling, or control is available for review.
- S 4. The facility is operated efficiently during wet weather events.

Comments:

All units of treatment appear to be operating efficiently.

Maintenance:

- S 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- S 2. Facility maintenance activities appear adequate.
- S 3. Lift station procedures include:
 - a. Adequate alarm or notification system for equipment failure.
 - b. Adequate inspections, cleaning, and maintenance activities.
 - c. Adequate documentation of all procedures
- S 4. Collection system maintenance activities appear adequate.

Comments:

All maintenance activities are on file at the facility.

Sludge:

- N 1. Sludges, screenings, and slurries are handled and disposed of properly.

Comments:

The facility does not produce sludge.

Self-Monitoring:

- S 1. Samples are taken at pre-designated locations and are representative.
- N 2. Flow-proportioned samples are obtained where needed.
- S 3. The facility conducts sampling of all waste streams, including type and frequency, as required in the permit.
- S 4. Sample collection procedures, including automatic sampling, include:
 - a. Samples are refrigerated during compositing.
 - b. Proper preservation techniques are used.
 - c. Containers and holding times conform to 40 CFR 136.3.
- S 5. Sample documentation is adequate and includes:
 - a. Date, time, and location of sampling.
 - b. Name of individual performing sampling.
 - c. Instantaneous flow for flow-weighted aliquots.
- N 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements are being met.

Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit.

Flow Measurement:

- S 1. Flow is properly measured as required by the permit.
- S 2. Flow charts and calibration records are available for review.
- N 3. Effluent flow is used in calculating effluent loadings.

Comments:

The effluent flow meter was last calibrated March 22, 2013.

Laboratory:

- 1. The following laboratory records were reviewed:

Lab Manual	Lab Procedures	Sample Log
CBOD Bench Sheets	Lab QA/QC Manual	TSS Bench Sheets
Ammonia Bench Sheets	pH Bench Sheets	

- U 2. The laboratory practices and protocol reviewed were adequate, including:
 - a. Written laboratory QA/QC manual.
 - b. Chain-of-Custody procedures followed.
 - c. Samples are properly stored.
 - d. Approved analytical methods are used.
 - e. Calibration and maintenance of instruments is adequate.
 - f. QA/QC procedures are adequate.
 - g. Dates of analyses.
 - h. Name of person performing analyses.

Comments:

The Laboratory evaluation generated an unsatisfactory rating. At the time of the inspection it was determined that the TSS, Ammonia and pH bench sheets were inadequate. This is a violation of Part I. B. 6 of the NPDES permit which states, in part, that the permittee shall record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit. Specifically, the Ammonia and pH bench sheets are lacking all calibration records. Specific information must include all buffers, standards, slope, and millivolt readings. The TSS bench sheets are lacking time in and time out of oven, along with oven temperatures.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of December 2012 to November 2013 were reviewed as part of the inspection.

- S 1. All facility records for the period including the previous three years were available for review.
- S 2. DMRs, MROs/MMRs, and CSODMRs are completed properly and accurately including:
 - a. "No Ex" column is accurate.
 - b. Signatory requirements are met.
 - c. Reports are prepared by or under the direction of a certified operator.

Comments:

The requested records were available and appear complete and accurate.

Compliance Schedules:

- N 1. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.
- N 2. Agreed Order compliance milestones have been met.

Comments:

Pretreatment:

- N 1. The facility operates without significant interference from industrial or other sources of toxic substances.
- N 2. For both Delegated and Non-Delegated pretreatment programs:
 - a. Industrial or commercial dischargers are regulated as required.
 - b. The permittee enforces the Sewer Use Ordinance and follows the Enforcement Guide.
 - c. The permittee submitted its annual pretreatment report to IDEM by April 1.
- N 3. Non-Delegated pretreatment programs have:
 - a. Developed or reevaluated the Sewer Use Ordinance and submitted it to IDEM.
 - b. Developed or reevaluated the Enforcement Response Guide and submitted it to IDEM.
- N 4. Pretreatment records were adequate and include:
 - a. Inventory of Industrial Waste Contributors.
 - b. Monitoring data.
 - c. Inspection Reports.
 - d. Compliance status records.
 - e. Enforcement actions.

Comments:

Effluent Limits Compliance:

- Yes 1. Were DMRs reviewed as part of the inspection?
DMRs for the period of December 2012 to November 2013 were reviewed as part of the inspection.
- No 2. Were violations noted during the review of DMRs?
- NA 3. Bypass and Noncompliance reporting.

Comments:

Inspector Name: Brian Smith	 IDEM REPRESENTATIVE	Email: bssmith@idem.IN.gov Phone Number: 317-650-5122
IDEM Manager: Don Daily	IDEM MANAGER REVIEW	Date: 1-17-14

Mark A. Orlich for SERO 01/10/2014