



January 10, 2023

Via Electronic Mail

Mr. Jason Palin
Wastewater Field Inspector
Office of Water Quality
Indiana Department of Environmental Management
jpalin@idem.in.gov

SUBJECT: Inspection Summary Letter dated December 21, 2022
Nucor Rd WWTP, Montgomery Co. RWS
NPDES Permit No. IN0063967
Crawfordsville, Montgomery County

Dear Mr. Palin:

The purpose of this letter is to respond to the referenced Inspection Summary Letter dated December 21, 2022 from the Indiana Department of Environmental Management (IDEM) regarding an inspection performed December 20, 2022 at the Nucor Road Water Pollution Control Facility (Nucor Rd. WPCF) which is owned and operated by the Montgomery County Regional Water and Sewer District (MCRWSD). This letter is being written on behalf of MCRWSD by contract operations firm Astbury Water Technology, Inc. (Astbury).

The Flow Measurements section of the inspection was rated as “unsatisfactory” due to the effluent flow meter reading 5.5 gal./min. for several minutes despite no flow passing through the trough. Below is our response to this finding, including remedial action taken:

- Astbury had subcontractor BL Anderson make a site visit on January 3 to help investigate this issue. Though the flow meter was calibrated within the last twelve (12) months as required by the NPDES permit, it was found that the flow meter was 0.2 inches too high and moss in the flow channel also led to slightly elevated readings. Both issues were corrected during this site visit.
- There is an acceptable margin of error for ultrasonic flow meters, but we believe differences in air temperature and cloud cover between the data of calibration and the erroneous reading caused the variance in flow meter height.
- In the future, we will proactively address flow metering inconsistencies and ensure moss does not accumulate in the discharge channel.

Headquarters Office/Lab
5940 West Raymond Street
Indianapolis, Indiana 46241
Office: 317-328-7153 x111
Cell: 317-828-1534
Fax: 317-290-1670
tastbury@astburygroup.com
AstburyWater.com

Northwest Regional Office/Lab
South Haven Sewer Works
305 West 700 North
Valparaiso, Indiana 46385
Office: 219-364-8375
Fax: 219-364-8386

Northeast Regional Office/Lab
601 West 400 North
Angola, Indiana 46703
Office: 260-668-8900
Fax: 260-668-8900

Southern Regional Office/Lab
2500 Lincoln Drive, Suite A
Clarksville, Indiana 47129
Office: 812-282-8481
Fax: 812-282-8554



Please don't hesitate to contact me with any questions regarding this response letter (via email at tastbury@astburygroup.com, or via mobile phone at 317-828-1534).

Best regards,

A handwritten signature in black ink, appearing to read "T. B. Astbury", with a horizontal line extending to the right.

Thomas B. Astbury

CC: Mark A. Bruce, Senior Project Manager – Astbury
Stuart Bookwalter, Certified Operator – Astbury
Dan Guard, President - MCRWSD



Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

December 21, 2022

Via Email to: dan.guard@montgomerycounty.in.gov
Mr. Dan Guard, Board President
Montgomery County RSD
110 W. South Blvd
Crawfordsville, Indiana 47933

Dear Mr. Guard:

Re: Inspection Summary/ Noncompliance Letter
Nucor Rd WWTP Montgomery Co Regional
Sewer Board
NPDES Permit No. IN0063967
Crawfordsville, Montgomery County

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

Date(s) of Inspection: December 20, 2022
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

Flow Measurement was rated as unsatisfactory due to the flow meter recording and reporting flow when there was no discharge. The flow meter was observed and photographed showing 5.5 Gal/Min for several minutes even though the SBR's were not discharging and no flow was passing through the trough. There was some algae observed within the effluent trough which may be causing a false reading, or the meter may have an issue, but regardless the facility needs to resolve the issue to ensure that flow is only reported when there is an actual discharge.

Part II. A. 1. of your permit requires you to comply with its terms and conditions. Any noncompliance with the terms of your permit may subject you to an enforcement action which can include the imposition of penalties. You are required to immediately take all necessary measures to comply with the terms and conditions of your NPDES Permit, specifically those violations identified above.

Within 30 days of receipt of this letter, a written detailed response documenting correction 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 formal enforcement action. Please direct your response to this letter to our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Jason Palin at 317-504-0007 or by email to japalin@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Handwritten signature of Kim Rohr in black ink, consisting of the letters 'K', 'G', and 'R' in a stylized, cursive script.

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0063967	Facility Type: Mixed Ownership	Facility Classification: Minor	TEMPO AI ID 105685
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Date(s) of Inspection:	December 20, 2022
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Type of Inspection:	Compliance Evaluation Inspection
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Name and Location of Facility Inspected: Nucor Rd WWTP Montgomery Co Regional Sewer Board 3480 S Nucor Rd Crawfordsville IN 47933	County: Montgomery	Receiving Waters: Epperson Drain	Permit Expiration Date: 7/31/2027
			Design Flow: 0.100MGD

On Site Representative(s):
No facility rep was met at the site but a VM was left for the certified operator with the issue discovered.

Was a verbal summary of findings presented to the on-site representative? **Yes, by Phone**

Certified Operator: Mark Bruce	Number: 15992	Class: III	Effective Date: 7-1-22	Expiration Date: 6-30-25	Email: mbruce@astburywatertechnology.com
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Cyber Security Contact:
Name: _____ Email: _____

Responsible Official: Mr. Dan Guard, Board President 110 W. South Blvd Crawfordsville, Indiana 47933	Permittee: Montgomery County RSD
	Email: dan.guard@montgomerycounty.in.gov
	Phone: _____
	Fax: _____
	Contacted? No

INSPECTION FINDINGS

- Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- Potential problems were discovered or observed. (3)
- Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- Violations were discovered and may subject you to an appropriate enforcement response. (1)

AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	S	Compliance Schedules
N	Effluent	S	Operation	U	Flow Measurement	S	Pretreatment
S	Permit	S	Maintenance	S	Laboratory	M	Effluent Limits Compliance
S	Collection System	S	Sludge Disposal	S	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

Receiving Waters:

S 1. The receiving stream was 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:

N 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.

Comments:

The facility is a SBR and was not in discharge mode during the course of the inspection, so no effluent could be observed.

Permit:

S 1. Did the facility have a current copy of the permit available for reference?

N 2. If the permit expires within 180 days, has a renewal application been submitted?

S 3. Receiving waters and Facility Description in the permit reflect actual conditions at the facility.

N 4. The permit has been properly transferred if there is a new owner.

Comments:

The facility was found to have a valid permit and the facility description, including units of treatment and receiving stream, is accurate.

Collection System:

N 1. CSO's were found to be adequately monitored and maintained.

S 2. There were 0 maintenance-related (clogged or blocked lines) overflow events in last 12 months.

S 3. There were 0 hydraulic (I&I) overflow events in last 12 months.

N 4. Facility has met SSO and dry weather CSO reporting requirements

N 5. Any adverse impacts from SSO and CSO events have been properly mitigated.

S 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.

S 7. Collection system maintenance activities appeared to be adequate.

Comments:

The Collection System evaluation generated a satisfactory rating. The collection system does not appear to have any issues with I/I and no overflows have been reported.

Facility/Site:

S 1. The facility was found to have standby power or equivalent provision.

S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility and lift stations.

S 3. Safe and adequate access was provided for inspection of all units and outfalls.

S 4. Facilities and equipment did not appear beyond their useful life.

5. List any safety concerns:

Comments:

The facility grounds appeared to be well maintained and there is an on-site generator in the event of an extended power outage.

Operation:

S 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including a report for an anticipated bypass report for steps of treatment taken out of service.

S 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:

a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was 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 wasted from the treatment system, in a timely manner, to maintain process efficiency.

b. Wasting of solids based on appropriate operational targets and valid process control testing.

c. Adequate documentation of solids removal, handling, or control was available for review.

S 4. The facility was found to be operated efficiently during wet weather events.

Comments:

All units of treatment appeared 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 appeared to be adequate.

Comments:

A maintenance log is kept in the offices on site with daily activities as well as PM tracking sheets.

Sludge Disposal:

S 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

Comments:

A records review during the inspection showed adequate handling, and disposal of sludge.

Self-Monitoring:

S 1. Samples were found to be taken at pre-designated locations and were found to be representative.

S 2. Flow-proportioned samples were found to be obtained where needed.

S 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required

in the permit.

- N 4. Sample collection procedures, including automatic sampling, were found to include:
 - a. Samples refrigerated during compositing.
 - b. Proper preservation techniques used.
 - c. Containers and holding times conformed to 40 CFR 136.3.
- N 5. Sample documentation was found to be adequate and included:
 - a. Dates, times, and locations of sampling.
 - b. Name of individual performing sampling.
 - c. Instantaneous flow for flow-weighted aliquots.
 - d. Chain of Custody records.
- N 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were found to be 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:

- U 1. Flow was found to be properly monitored as required by the permit.
- U 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.
- N 3. The stream flow gauging station is calibrated as often as necessary to provide accurate and reliable data, but at least once every 12 months.
- N 4. A copy of the stream flow calibration curve or table is submitted to IDEM (OWQ Compliance Data Section) no later than October 1 of each year.

Comments:

Flow Measurement was rated as unsatisfactory due to the flow meter recording and reporting flow when there was no discharge. The flow meter was observed and photographed showing 5.5 Gal/Min for several minutes even though the SBR's were not discharging and no flow was passing through the trough. There was some algae observed within the effluent trough which may be causing a false reading, or the meter may have an issue, but regardless the facility needs to resolve the issue to ensure that flow is only reported when there is an actual discharge.

Laboratory:

The following laboratory records were reviewed:

pH Bench Sheets Contract Lab Reports Chain-of-Custody

- S 1. The laboratory practices and protocol reviewed were adequate, including:
 - a. A written laboratory QA/QC manual was available.
 - b. Samples were found to be properly stored.
 - c. Approved analytical methods were found to be used.
 - d. Calibration and maintenance of instruments was found to be adequate.
 - e. QA/QC procedures were found to be adequate.
 - f. Dates of analyses (and times where required) were recorded.
 - g. Name of person performing analyses was recorded.
- S 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Contract Lab Information

ESG Laboratory	Indianapolis, IN
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Comments

The bench sheets reviewed during the inspection appeared to be accurate and complete.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of November 2021 to October 2022 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 and MROs were found to be completed properly and accurately including:
 - a. "No Ex" column was accurate.

- b. Signatory requirements were met.
- c. Reports were prepared by or under the direction of a certified operator.

N 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:

The requested records were available and appeared to be complete and accurate. Records were reviewed in NetDMR prior to arrival on site but paper copies were also available for review.

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:

There is no Schedule of Compliance in the current permit, and there is no Agreed Order.

Pretreatment:

S 1. No evidence of interference from industrial or other sources of toxic substances was noted.

N 2. For both Delegated and Non-Delegated pretreatment programs:

- a. Industrial or commercial dischargers were found to be regulated as required.
- b. The permittee was found to enforce the Sewer Use Ordinance (SUO) and the Enforcement Response Plan (ERP).

N 3. If the non-delegated permittee accepts hauled waste:

- a. Does the POTW provide written permission to haulers?
- b. Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
- c. Does the POTW retain records of each load?

Comments:

The facility has no industrial sources.

Effluent Limits Compliance:

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of November 2021 to October 2022 were reviewed as part of the inspection.

Yes 2. Were violations noted during the review of DMRs?

The Effluent Limits Violations area was rated marginal due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
January	2022	001	TSS	1

Comments:

IDEM REPRESENTATIVE

Inspector Name:

Jason Palin

Email:

japalin@idem.IN.gov

Phone Number:

317-504-0007

IDEM MANAGER REVIEW

IDEM Manager:

Kim Rohr

Date:

12/21/2022

Inspection Photographs



Facility:
Nucor Rd WWTP Montgomery Co Regional Sewer Board
Photographer :
Jason Palin
Date: 12/20/2022 Time: 11:00:00 AM
Others Present:
Location/Description:
Flow meter showing 5.5 Gal/min Flow



Facility:
Nucor Rd WWTP Montgomery Co Regional Sewer Board
Photographer :
Jason Palin
Date: 12/20/2022 Time: 11:00:00 AM
Others Present:
Location/Description:
No flow in flow channel