### TOWN OF ETNA GREEN P. O. BOX 183 ETNA GREEN, in 46524 574-858-9321

June 27, 2024

Ms. Lynn Stackhouse
Indiana Department of Environmental Management
100 N. Senate Avenue
Indianapolis, IN 46204
Istack@idem.IN.gov

RE: To

Town of Etna Green

NPDES Permit No. IN040002

Inspection Summary/ Noncompliance Letter Response

Dear Ms. Stackhouse:

This letter is in response to your Inspection Summary/Noncompliance Letter dated June 4, 2024. Below you will find your comments, followed by our responses.

## COMMENT NO. 1

In the November 2023 inspection, several significant violations were noted regarding the condition of the treatment plant. Many of these have been addressed but the rusted/deteriorated walking surfaces in the treatment plant area have not. Plant operators must be able to access all areas of the treatment plant in a safe manner to effectively operate the plant.

## RESPONSE NO. 1

The Town is fully aware of the condition of the wastewater treatment plant (WWTP) and we are currently working with our team comprised of Commonwealth Engineers, Inc., Astbury Water Technologies, Inc. and our staff to develop a plan to replace facilities that are beyond useful life. The process will need to be initiated with the development of a Preliminary Engineering Report (PER) and solicitation of the PER to funding agencies to obtain an optimal financial package for utility improvements.

# COMMENT NO. 2

Another area of concern is the overall age/condition of the influent, activated sludge and clarifier areas of the plant located within the pole barn building. All indications point to the fact that the plant is near or at the end of its useful life. While additional paddles were added to the rotors for improved air in the aeration tanks, they have not completely resolved the operational air problem. In addition, the control panel is obsolete and has an adjustable main breaker. Not only is this breaker being operated at its full capacity and operators stated concerns of its failure, but locating qualified contractors to work on the breaker is difficult. The failure of the power source would result in very significant operational problems and most likely very significant effluent limitation violations.

### RESPONSE NO. 2

Per the previous response, a long-term solution for the failing WWTP unit processes. As for the breaker issue, we will continue to seek qualified electricians to have on call for emergency repairs.

### COMMENT NO. 3

The council needs to begin the process of evaluating either a plant upgrade or a plant replacement. Please note that 327 /AC 5-22-10 requires the owner or governing body of a wastewater treatment plant to be responsible for providing adequate funding and oversight to ensure the proper operation, maintenance, management and supervision of said plant.

### RESPONSE NO. 3

Please see previous responses regarding the Town's plans for a long-term solution to repair or replace our aging wastewater treatment facility.

Should you have any additional comments or questions, please feel free to contact me by email at <a href="https://hrc.nih.gov/

Sincerely,

TOWN OF ETNA GREEN

Heath Roberts, Council President

BMD/mst

CC:

Josh Denlinger, Certified Operator – Astbury Water Technology, Inc. Bryan Long, Operator – Town of Etna Green James E. Weingart, Director Northern Regional Office - IDEM Commonwealth Engineers, Inc.