

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 · (317) 232-8603 · www.idem.IN.gov

Eric J. Holcomb Governor Brian C. Rockensuess Commissioner

July 17, 2024

<u>Via Email</u>: sanchezh@bloomington.in.gov Mr. Hector Ortiz-Sanchez, Assistant Director - Operations City of Bloomington Utilities – Monroe Water Treatment Plant PO Box 1216 Bloomington, Indiana 47402

Dear Mr. Ortiz-Sanchez:

Re: Inadequate Response Non-Compliance Letter Monroe Water Treatment Plant NPDES Permit No. IN0060810 Bloomington, Monroe County

An inspection of the above-referenced facility or location was conducted on June 27, 2024, by a representative of the Indiana Department of Environmental Management pursuant to IC 13-18-3-9.

Your facility was sent a Non-Compliance Letter concerning issues observed during the above noted inspection. The letter and inspection report are enclosed. A written detailed response documenting the corrections required in the inspection was due thirty (30) days from receipt of the Non-Compliance Letter. Your response was deemed insufficient. More specifically, a written detailed response documenting correction of the concerns listed and/or a plan for assuring future compliance must be submitted to this office. The response stated that the facility utilizes sodium thiosulfate rather than sodium bisulfate, which is the chemical that the Permittee recorded in the permit application. This can be corrected when the facility contacts IDEM's Industrial Permit Section regarding the other issues. However, a written response regarding items 1 through 3 noted in the letter of the attached inspection is requested.

Within 30 days of receipt of this letter, a written detailed response to our July 8, 2024, letter 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 via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Christina Sandlin at 812-216-5646 or by email to csandlin@idem.in.gov. Thank you for your attention to this matter.



Sincerely,

IG R 2

Kim Rohr, Section Chief Wastewater Inspections Section Office of Water Quality

Enclosure



Indiana Department of Environmental Management

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Eric J. Holcomb Governor Brian Rockensuess Commissioner

July 08, 2024

Via Email to: sanchezh@bloomington.in.gov Mr. Hector Ortiz Sanchez, Assistant Director - Operations City of Bloomington Utilities - Monroe Water Treatment Plant PO Box 1216 Bloomington, Indiana 47402

Dear Mr. Ortiz Sanchez:

Re: Inspection Summary/ Noncompliance Letter Monroe Water Treatment Plant NPDES Permit No. IN0060810 Bloomington, Monroe 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:	June 27, 2024
Type of Inspection:	Reconnaissance Inspection
Inspection Results:	Violations were observed.

The following concerns were noted:

1. The Permit evaluation generated an unsatisfactory rating. The facility has a point source discharge that is not regulated by a NPDES permit. This is a violation of Part II. A. 6 of the permit which states, in part, the permit may be modified or terminated for cause, including, but not limited to, violation of any terms or conditions of the permit, failure of the permittee to disclose fully all relevant facts or misrepresentation of any relevant facts in the permit application or during the permit issuance process. The facility is currently authorized to discharge from Outfalls 001 and 003. Discharges from Outfall 001 are to include filter backwash and sedimentation basin wastewater. Per the permit application, the filter backwash water flows by gravity to the backwash holding basin. The water is then pumped to a clarifier from the backwash holding basin. After the clarifier, sodium bisulfite is injected into the effluent to neutralize the chlorine and the water discharges through Outfall 001. Discharges from Outfall 003 include the facility's finished water reservoir. There is an overflow point within the finished water reservoir, and discharges from Outfall 003 are considered emergency overflow discharges, but has a table in the permit with appropriate parameters for analysis.

The facility utilizes the two sedimentation ponds for overflow filter backwash water from the backwash holding basin. The backwash holding basin has an overflow/bypass pipe that directs flow to the upper sedimentation pond. Once the upper pond reaches a certain level, then water will flow to the lower sedimentation pond. The lower sedimentation pond has an overflow pipe that discharges into Sugarcamp Hollow that is not associated with Outfall 001. This an unpermitted outfall. The facility has been sampling and analyzing effluent flow from the sedimentation ponds and recording the results as Outfall 003. Outfall 003's limits table has finished water parameters and not sedimentation parameters and is only permitted for finished water discharge. It is noted that this illicit discharge intermittently discharges. **The facility needs to contact IDEM's Industrial Permit Section to correct these issues**.

- 2. Operation was rated as unsatisfactory due to the sedimentation ponds appearing to be at maximum capacity. It was noted during the inspection that the upper pond appeared to be over halfway full of solids and the lower pond appeared to be at maximum capacity. Part II. B. 1. of the permit requires that all facilities and systems (and related appurtenances) for collection and treatment that are installed or used by the permittee and necessary for achieving compliance with the terms and conditions of the permit in accordance with 327 IAC 5-2-8 (9) must be maintained in good working order and efficiently operated at all times. Inspector recommends dredging both of the ponds to prevent any unintended releases of solids.
- 3. The Records/Reports evaluation generated an unsatisfactory review due to inaccurate reporting. This is a violation of Part II. C. 5. of the permit states, in part, that where a permittee has submitted incorrect information in any report to the Commissioner, the permittee shall promptly submit such facts or corrected information to the Commissioner. The facility has been sampling and analyzing an illicit discharge point that is not acknowledged within the current permit. Outfall 003 is authorized to discharge finished drinking water from the facility's finished water reservoir. The facility has been sampling effluent flow from the two sedimentation ponds and recording those results on NetDMR as Outfall 003.

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 Christina Sandlin at 812-216-5646 or by email to csandlin@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Mark a Smick

Mark A. Amick, Director Southeast Regional Office

Enclosure



NPDES Industrial Facility Inspection Report INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

1816											
NPDES Pe	rmit Number:	Facility Type	Facility Type:				Facility Classifi			ssification: TEMPO AI ID	
	IN0060810		Industrial				Minor A-SO				
Date(s)	of Inspection: J	une 27, 2024									
Type of	Inspection: Re	connaissance	e Inspect	tion							
Name and	Location of Facility Ins					Receiving W	aters/POTW	:		Permi	t Expiration Date:
Monroe Water Treatment Plant											3/31/2025
7470 S S	Shields Ridge Rd			county:		Sugarcamp Hollow				-	n Flow:
	Bloomington IN 47401 Monroe						NA				
On Site Re First Name	presentative(s): Last Name	Title		Emai	a				Pho	ne	
Don	Gramlich		ntender			cd@bloon	ninaton.i	n.aov			2-4858
	Was a verbal su							Yes			
Certified O				Effective Date:		iration Date:	Email:				
	on Gramlich	020920	A-SO	7-1-21		6-30-24	gramlicd	@bloon	nington.in	.gov	
Cyber S	ecurity Contact										
Name: NA				Email:							
Responsibl Mr. Hect	le Official: tor Ortiz Sanchez, /	Assistant Dire	ector - Or	perations		H	2	~			nroe Water T
PO Box	-		0101 - 01	2010110		H			nington.in	.gov	
										Contacted?	
Bloomington, Indiana 47402 Fax:							No				
			-	NSPECTION							
	Conditions evaluate						spection. (5)			
	Violations were dis	covered but co	rrected d	uring the insp	ecti	on. (4)					
	Potential problems	were discovere	ed or obse	erved.(3)							
	Violations were dis	covered and re	quire a su	ubmittal from	you	and/or a fo	llow-up in:	spection	by IDEM. ((2)	
	Violations were dis	covered and m	ay subjec	ct you to an a	ppro	priate enfor	rcement re	sponse.	(1)		
		AF	REASEV	ALUATED	DU	RING INSP	ECTION				
				= Marginal, U				luated			
S Re	ceiving Waters	N	Facility	//Site	Ν	Self-Moni	toring	N	Enforcer	nent	
S Eff	luent/Discharge	U	Operat	tion	Ν	Flow Mea	surement				
U Pe	rmit	N	Mainte	nance	Ν	Laborator	у	N	Effluent	Limits	Compliance
		N	Sludge	;	U	Records/	Reports	N	Other:		
		I	DETA		\ E\	ALUATIO	NS				
1	ng Waters:										
Comments	: eiving stream was	free of notabl	o foam	algao or soli	de						
		iree or notabl	e Ioani, a	algae or soli	us.						
1	/ Discharge: tion of Multiple C	utfalle									
			tion Con	nments							
001		Outfall Inspection Comments									
		The effluent was clear and free of color. There were no discharges at the time of the inspection.									
003		i nere were n	o discha	rges at the t	me	or the insp	ection.				
Comments	c										
Permit:											

enni.

Comments:

The Permit evaluation generated an unsatisfactory rating. The facility has a point source discharge that is not regulated by a NPDES permit. This is a violation of Part II. A. 6 of the permit which states, in part, the permit may be modified or terminated for cause, including, but not limited to, violation of any terms or conditions of the permit, failure of the permittee to disclose fully all relevant facts or misrepresentation of any relevant facts in the permit application or during the permit issuance process. The facility is currently authorized to discharge from Outfalls 001 and 003. Discharges from Outfall 001 are to include filter backwash and sedimentation basin wastewater. Per the permit application, the filter backwash water flows by gravity to the backwash holding basin. The water is then pumped to a clarifier from the backwash holding basin. After the clarifier, sodium bisulfite is injected into the effluent to neutralize the chlorine and the water discharges through Outfall 001. Discharges from Outfall 003 include the facility's finished water reservoir. There is an overflow point within the finished water reservoir, and discharges from Outfall 003 are considered emergency overflow discharges, but has a table in the permit with appropriate parameters for analysis.

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Facility/Site:

Comments:

The facility grounds are well maintained. The facility has a standby generator that is serviced annually.

Operation: Comments:

Operation was rated as unsatisfactory due to the sedimentation ponds appearing to be at maximum capacity. It was noted during the inspection that the upper pond appeared to be over halfway full of solids and the lower pond appeared to be at maximum capacity. Part II. B. 1. of the permit requires that all facilities and systems (and related appurtenances) for collection and treatment that are installed or used by the permittee and necessary for achieving compliance with the terms and conditions of the permit in accordance with 327 IAC 5-2-8 (9) must be maintained in good working order and efficiently operated at all times. Inspector recommends dredging both of the ponds to prevent any unintended releases of solids.

Records/Reports:

The following records/reports were reviewed:

Comments:

The Records/Reports evaluation generated an unsatisfactory review due to inaccurate reporting. This is a violation of Part II. C. 5. of the permit states, in part, that where a permittee has submitted incorrect information in any report to the Commissioner, the permittee shall promptly submit such facts or corrected information to the Commissioner. The facility has been sampling and analyzing an illicit discharge point that is not acknowledged within the current permit. Outfall 003 is authorized to discharge finished drinking water from the facility's finished water reservoir. The facility has been sampling effluent flow from the two sedimentation ponds and recording those results on NetDMR as Outfall 003.

Effluent Limits Compliance:

No	 Were DMRs reviewed as part of the inspection?
Comme	ents:

IDEM REPRESENTATIVE

Email: csandlin@idem.IN.gov Phone Number: 812-216-5646

Date:

6/6/2024

IDEM MANAGER REVIEW

IDEM Manager:

Inspector Name:

Christina Sandlin

Mark A. Amick

From:	Don Gramlich
To:	IDEM Wastewater Reports
Subject:	Re: Monroe Water Treatment Plant IN0060810 6-27-24 CEI Monroe Co.
Date:	Tuesday, July 9, 2024 8:14:11 AM
Attachments:	image002.png
	image003.png

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

We do not use sodium bisulfate. We use sodium thiosulfate for de-chlorination.

On Mon, Jul 8, 2024 at 3:47 PM IDEM Wastewater Reports <<u>WWReports@idem.in.gov</u>> wrote:

The attached document includes a letter and inspection report resulting from a recent inspection by IDEM staff. Please be sure these documents are reviewed by the appropriate individuals. If the letter requires a response, we encourage you to respond via email by sending your response to <u>wwViolationResponse@idem.IN.gov</u>.

Thank you.

Charnell Carter

On behalf of



Kim Rohr

Section Chief

Wastewater Inspections

Office of Water Quality

Office: 317-234-2558

Cell: 317-605-6489

krohr@idem.in.gov

Indiana Department of Environmental Management

100 N. Senate Avenue, Indianapolis, IN 46204

https://www.in.gov/idem/cleanwater/2337.htm

IDEM values your feedback. Please take two minutes and complete this brief survey.



Don Gramlich Superintendent Monroe Water Treatment Plant Bloomington,IN 47401 o-812-824-9311 c-812-272-4858 gramlicd@bloomington.in.gov

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