



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

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

July 24, 2024

Via Email to: justin.green@cityofsalemin.com
The Honorable Justin Green, Mayor
City of Salem
201 E. Market St.
Salem, Indiana 47167

Dear Mayor Green:

Re: **Inspection Summary/ Noncompliance Letter**
Salem Water Works - Lake John Hay Water
Plant
NPDES Permit No. IN0059404
Salem, Washington 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: July 23, 2024
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

The Self Monitoring evaluation generated an unsatisfactory rating for failing to collect a sample during a discharge that occurred on July 7, 2023; furthermore, the discharge was not noted on the July 2023 MMR. This is a violation of the sampling measurement frequencies in the discharge limitations table in Part I. A. of the permit.

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 Andrew Dryden at 812-530-0429 or by email to adryden@idem.IN.gov.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Mark A. Amick". The signature is written in black ink and is positioned above the printed name.

Mark A. Amick, Director
Southeast Regional Office

Enclosure



NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0059404	Facility Type: Industrial	Facility Classification: Minor	TEMPO AI ID A-SO
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Date(s) of Inspection:	July 23, 2024
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Type of Inspection: Compliance Evaluation Inspection

Name and Location of Facility Inspected: Salem Water Works - Lake John Hay Water Plant 3978 N Rinkers Creek Rd Salem IN 47167	County: Washington	Receiving Waters/POTW: Rinkers Creek	Permit Expiration Date: 1/31/2028
			Design Flow: NA

On Site Representative(s): First Name Last Name Title Email Phone
Jennifer Mills Operator jennifer.mills@cityofsalemin.com 502-656-5932

Was a verbal summary of the inspection given to the on-site rep? **Yes**

Certified Operator: Jennifer Mills	Number: 21705	Class: II	Effective Date: 7-1-24	Expiration Date: 6-30-25	Email: jennifer.mills@cityofsalemin.com
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Cyber Security Contact
Name: NA Email:

Responsible Official: The Honorable Justin Green, Mayor 201 E. Market St. Salem, Indiana 47167	Permittee: City of Salem Email: justin.green@cityofsalemin.com Phone: 812-883-4265 Fax:	Contacted? No
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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	U	Self-Monitoring	M	Enforcement
N	Effluent/Discharge	S	Operation	S	Flow Measurement		
S	Permit	S	Maintenance	S	Laboratory	S	Effluent Limits Compliance
		S	Sludge	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 Waters evaluation generated a satisfactory rating. The receiving stream was free of notable foam, algae, and solids.

Effluent/Discharge:

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

N 2. Pretreatment discharge into sanitary sewers appeared free of excessive oils, grease, solids, or foam and did not appear to be in violation of the local Sewer Use Ordinance.

N 3. Pretreatment discharge into sanitary sewers did not contain materials that pass through or interfere with the operation of the POTW.

Comments:

The facility was not discharging at the time of the inspection.

Permit:

- S 1. Did the facility have a copy of the current permit available for reference.
- N 2. If the permit expires within 180 days, has a renewal application been submitted?
- S 3. Receiving waters are accurately described in the permit.
- N 4. The permit has been properly transferred if there is a new owner.
- N 5. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

Comments:

The Permit evaluation generated a satisfactory rating. The facility has a valid permit.

Facility/Site:

- S 1. The facility was found to have standby power or equivalent provision, If required.
- S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility.
- S 3. Safe and adequate access was provided for inspection of all treatment units and outfalls.
- S 4. Facilities and equipment did not appear beyond their useful life.
- 5. List any safety concerns noted during the inspection in the box below:

Comments:

The Facility/Site evaluation generated a satisfactory rating. The facility has a backup generator that tested weekly. The backwash retention tank is equipped with a transducer that monitors liquid levels. The transducer is connected into the facility's SCADA system.

Operation:

- S 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including 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.
- N 3. Solids handling procedures were adequate.
- N 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

The Operation evaluation generated a satisfactory rating. All units of treatment appear to be operated 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 adequate.

Comments:

The Maintenance evaluation generated a satisfactory rating. A new water plant was built and put on-line May 2021. Maintenance performed is recorded and kept on site.

Sludge:

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

Comments:

The Sludge evaluation generated a satisfactory rating. Sludge from the backwash tank is hauled away by Losson Excavating and Septic. There has been no sludge hauled away in the last 12 months.

Self-Monitoring:

- N 1. Samples were found to be taken at pre-designated locations and were found to be representative.
- N 2. Flow-proportioned samples were found to be obtained where needed.
- U 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, include:
 - a. Samples refrigerated during compositing.
 - b. Proper preservation techniques used.
 - c. Containers and holding times conform to 40 CFR 136.3.
- N 5. Sample documentation was adequate and includes:
 - 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 Total Toxic Organic (TTO) requirements were being met.
- N 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

The Self Monitoring evaluation generated an unsatisfactory rating for failing to collect a sample during a discharge that occurred on July 7, 2023; furthermore, the discharge was not noted on the July 2023 MMR. This is a violation of the sampling measurement frequencies in the discharge limitations table in Part I. A. of the permit. The facility has reported no discharges for the last 12 months.

Flow Measurement:

- S 1. Flow was found to be properly monitored as required by the permit.
N 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.

Comments:

The Flow Measurement evaluation generated a satisfactory rating. Flow is calculated by using the known volume of liquid discharged from the backwash to the settling tank and the available capacity in the settling tank.

Laboratory:

- 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 used.
d. Calibration and maintenance of instruments was adequate.
e. QA/QC procedures were 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.

Comments:

The Laboratory evaluation generated a satisfactory rating. pH buffers are within their expiration dates. The laboratory balance was last calibrated June of 2024. There were no wastewater samples run in the last 12 months; therefore, no bench sheets were reviewed during the inspection.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of June 2023 to May 2024 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 MMRs were 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 are adequate.

Comments:

The Records/Reports evaluation generated a satisfactory rating. The requested records were available and appear complete and accurate.

Enforcement:

- M 1. Agreed Order compliance milestones have been met.

2018-25831-W

Tessa Scalzo, TScalzo@IDEM.in.gov, 317-233-5975

Comments:

The Enforcement evaluation generated a marginal rating for two late DMR submittals on March and April of 2024. A change in the facility superintendents occurred during this time.

Effluent Limits Compliance:

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

DMRs for the period of June 2023 to May 2024 were reviewed as part of the inspection.

- No 2. Were violations noted during the review of DMRs?

Comments:

There was no discharge reported for the 12 months reviewed.

IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Andrew Dryden

adryden@idem.IN.gov

812-530-0429

IDEM MANAGER REVIEW

IDEM Manager:

Date:

Mark A. Amick

7/24/2024