



CITY OF WARSAW

WASTEWATER TREATMENT UTILITY

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30 July 2024

Mary Armacost
Pretreatment Program Coordinator
IDEM-OW Q, Mail Code 65-40
100 N. Senate Avenue
Indianapolis, IN 46204

Re: Response to Audit Summary / Deficiency Letter

Dear Mary:

This letter is in response to your Pretreatment program audit on 16-17 July 2024 of the City of Warsaw's Pretreatment Program.

As outlined in IDEM's Inspection summary / deficiency letter dated 23 July 2024, I will address what has been:

- A. Completed
- B. Compliance schedule with a deadline for completing each task
- C. When finished, the city will provide you with a report within 15 days of tasks completed with supporting documentation.

Best regards!

Danny Risner, CPC
Pretreatment Program Coordinator

Control Mechanisms

Issue ---- In accordance with 40 CFR 403.8(f)(1)(iii)(B)(4) permits must contain sampling locations, sampling frequency, and sample type. Dalton's permit lists the frequency of 001B, but not for 001 or 001A. Paragon Medical list sample frequency for outfalls 002 & 003 but not for 001. The frequency for Paragon Medical's TTO analysis is as required by the POTW.

Corrective Action ---- Will obsolete Dalton's 001A outfall since it's no longer used and update the frequency in Paragon Medical & Dalton's permits for the sampling frequency for all outfalls.

Completion Date ----- No later than 15 October 2024

Issue ---- Dalton Foundry's permit lists all types as composite samples. Phenols, O&G and pH samples should be grabs. No sample types were listed for any of the outfalls 001.

Corrective Action ----- Will change the samples in question to grab samples in the permit. 001 is only sampled by the Authority unless a violation is discovered then the IU would resample 001. Will input the types of samples in the permit for 001.

Completion Date ----- No later than 15 October 2024

Issue ----- In accordance with 403.12(j) the IU is required to notify the POTW if there is a substantial change in their discharge in either the volume or character of pollutants. As a production-based category the permit for Dalton is required to contain a notification of change in the standard cubic feet of their air scrubbers.

Corrective Action Will add language to their permit explaining the requirement.

Completion Date ----- No later than 15 October 2024

Issue ----- In accordance with 40 CFR 403.8(f)(2)(vi) significant industrial users are required to notify the POTW immediately of any changes at its facility affecting the potential for a slug discharge.

Corrective Action ----- Will add language to the permits reviewed to include the requirement.

Completion Date ----- No later than 15 October 2024

IU Characterization

40CFR 403.8(f)(2)(i) & (ii) the POTW pretreatment is required to identify the characteristics of pollutants contributed to the POTW by industrial users.

Issue----- Warsaw Chemical is not listed as a QU.

Corrective Action ----- Will check to see if they fall under a category to be permitted

Completion Date ----- No later than 15 October 2024

Recommendations

Recommended----- In the Slug Control Plan the facility is required to notify the POTW immediately, it is recommended that that immediately be defined. i.e. immediately, no more than X hours.

Action----- Will add in a time limit to the section.

Complete date----- No later than 15 October 2024

Recommended----- Requirements only listed in briefing memo are not legally enforceable. The requirement for TTO analysis within 60 days of permit effective date should be in the permit as well as the briefing memo if the City is requiring this.

Action----- Will add the language to the plan section to reflect this.

Complete date----- No later than 15 October 2024