IDEM
Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

December 05, 2024

Via Email to: brdstagegmail.com
Mr. Benny Stage, Town Council President
Town of Claypool
P. O. Box 6
Claypool, Indiana 46510

Dear Mr. Stage:

Re: **Inspection Summary/ Noncompliance Letter**
Claypool Wastewater Treatment Plant
NPDES Permit No. IN0039870
Claypool, Kosciusko County

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

Date(s) of Inspection: December 03, 2024

Type of Inspection: Compliance Evaluation Inspection

Inspection Results: Violations were observed.

The following concerns were noted:

1. No sludge has been removed from the lagoons. The last sludge depth survey completed was in 2018. In accordance with Part I. B. 2 of your permit, sludge depth analysis needs to be completed annually.

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

Month	Year	Outfall	Parameter	Number
November	2023	001	Ammonia Nitrogen	3
February	2024	001	Ammonia Nitrogen	3
March	2024	001	Ammonia Nitrogen	2

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.

Effective immediately, IDEM is initiating a program strongly encouraging domestic wastewater utilities to perform cybersecurity vulnerability assessments, and to take actions to mitigate identified vulnerabilities and increase the cybersecurity resilience of Indiana's water sector. Utilities can choose any assessment tool appropriate for the water sector, but IDEM is highlighting the following websites for information and helpful vulnerability assessment tools made available from the U.S. EPA and the American Water Works Association: https://www.epa.gov/waterresilience/epa-cybersecurity-water-sector and https://www.awwa.org/Resources-Tools/Resource-Topics/Risk-Resilience/Cybersecurity-Guidance. IDEM will continue to share important updates on the cybersecurity of the water sector.

Within 30 days of receipt of this letter, a written detailed response documenting correction of item 1 listed above and/or a plan for assuring future compliance must be submitted to this office.
Please direct your response to this letter to our letterhead address or via email to wwViolationResponse@idem.IN.gov. Please direct any questions to Lynn Stackhouse at 317-691-0099 or by email to lstack@idem.in.gov.

All other information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your Agreed Order, Case No.2021-28039-W. A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records

Sincerely,

James E. Weingart

James E. Weingart, Director
Northern Regional Office

Enclosure

NPDES Wastewater Facility Inspection Report
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number:	Facility Type:		Facility Classification:	TEMPO AI ID
IN0039870	Municipality	Minor	I-SP	

Date(s) of Inspection:	December 03, 2024
Type of Inspection:	Compliance Evaluation Inspection

Name and Location of Facility Inspected:	Receiving Waters:	Permit Expiration Date:
Claypool Wastewater Treatment Plant 200 North Walnut Street — County: Kosciusko Claypool IN 46510	Trimble Creek	5/31/2026 Design Flow: 0.0330MGD

On Site Representative(s):

First Name	Last Name	Title	Email	Phone
Danny	Warner	Superintendent	utilities@townofclaypool.com	574-566-2322

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

Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:
Danny Warner	17201	I-SP	7-1-22	6-30-25	utilities@townofclaypool.com

Cyber Security Contact:

Name: Email:

Responsible Official:	
Mr. Benny Stage, Town Council President P. O. Box 6 Claypool, Indiana 46510	Permittee: Town of Claypool Email: brdstagegmail.com 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

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

DETAILED AREA EVALUATIONS

Receiving Waters:

N 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.

Comments:
The facility has not had a recent discharge and the receiving stream was not evaluated.

Effluent:

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

Comments:
No discharge was occurring at the time of the inspection.

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.
N 5. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

Comments:
The facility was found to have a valid permit and the facility description, including units of treatment (chemical disinfection) and receiving stream, is accurate.

Collection System:

N 1. CSO's were found to be adequately monitored and maintained.
S 2. There were no reported maintenance-related (clogged or blocked lines) overflow events in last 12 months.
S 3. There were no reported 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.
N 7. Collection system maintenance activities appeared to be adequate.

Comments:
The facility reported no collection system overflows in the last 12 months. There are two lift stations in the collection system and one at the plant effluent. The two collection system stations are checked 5 days weekly and pump hours recorded. The main lift station has a dedicated generator and telemetry and the school lift station has a portable generator. The school lift station is scheduled to have a dedicated generator installed as part of an upcoming WWTP upgrade.

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 is a two cell lagoon system, followed by chemical disinfection. Each lagoon has a baffle down the center to increase detention time, essentially creating four lagoons. However, ammonia violations continue during the winter months. The Town is in the final design phase for a new SAGR treatment unit. Overall, the lagoons appeared to be operating as designed and no concerns were noted.

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

Comments:
Both lagoons appeared to be operating well. Some duckweed was present in both lagoons, but not found to be excessive. All lagoon banks appeared well maintained and did not have excessive vegetation.

Maintenance:

N 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:
Maintenance activities appeared adequate.

Sludge Disposal:

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

Comments:
No sludge has been removed from the lagoons. The last sludge depth survey completed was in 2018. In accordance with Part I. B. 2 of your permit, sludge depth analysis needs to be completed annually.

Self-Monitoring:

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

S 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:
All sampling practices, including raw sampling during times of no discharge, are completed at the frequency required by the permit. All required samples are grab samples.

Flow Measurement:

S 1. Flow was found to be properly monitored as required by the permit.
S 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.
S 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.
S 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:
The facility's flow measurement program, including all documentation, was found to be adequate and representative. The influent flow meter was calibrated in May 2024. Both the effluent and stream flow meter's were calibrated in August 2024. The 2024 stream flow calibration curve was submitted to IDEM in August 2024.

Laboratory:

The following laboratory records were reviewed:

pH Bench Sheets CBOD Bench Sheets TSS Bench Sheets

M 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.

N 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Comments:
Laboratory was rated as marginal for the following:

A. TSS - you are not consistently meeting the required filter residual of 0.025 grams. You must increase your sample volume. A maximum volume for the test is 1000 mL.
B. CBOD - you are not consistently meeting the required 2.0 mg/L depletion of the sample. You must adjust

your sample volume to meet this criteria.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of November 2023 to October 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 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 mostly accurate. It was brought to the superintendent's attention that in the November 2023 submitted reports, the attached MRO was for October 2023. This report will be corrected and resubmitted.

Enforcement:

S 1. Agreed Order and/or Compliance Plan milestones have been met.

2021-28427-W
Aletha Lenahan, ALenahan@IDEM.in.gov, 317-232-8407

Comments:

The facility has submitted the quarterly updates as required and appears to be on schedule with the timelines associated with the Compliance Plan.

Pretreatment:

N 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 permitee 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 contributors.

Effluent Limits Compliance:

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

DMRs for the period of November 2023 to October 2024 were reviewed as part of the inspection.

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

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

Month	Year	Outfall	Parameter	Number
November	2023	001	Ammonia Nitrogen	3
February	2024	001	Ammonia Nitrogen	3
March	2024	001	Ammonia Nitrogen	2

Comments:

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Lynn Stackhouse	lstack@idem.IN.gov	317-691-0099

IDEM MANAGER REVIEW

IDEM Manager:	Date:
James E. Weingart	12/5/2024