

**From:** [O'Connell, Morrighan](mailto:O'Connell, Morrighan)  
**To:** [dadowney@mcsan.org](mailto:dadowney@mcsan.org); [dadowney@gmail.com](mailto:dadowney@gmail.com)  
**Cc:** [cyagelski@mcsan.org](mailto:cyagelski@mcsan.org)  
**Subject:** City of Michigan City 000051 Renewal Review  
**Date:** Wednesday, October 2, 2024 3:30:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Hi Adam,

I have reviewed the City of Michigan City's land application of biosolids renewal application. The following information is needed to complete my review:

1. Our records show Ms. Melissa Mullins was previously listed as your land application coordinator. Please confirm if this information is still accurate
2. Part IX. and X refer to restrictions related to "areas known to have abnormally high-water tables at or near the surface". Please reference the conversation found here ([VFC # 80015741](#)) related to issues using that terminology. You may revise the Stockpiling and Frozen/Snow covered ground management plan to reflect either:
  - a. The Natural Resource Conservation Service's (NRCS) Soil Survey data reports the depth to the water table and any seasonally high-water tables during specific times of the year. You could revise your management plan to say that land application on frozen/snow covered ground will occur when the water table is XXX feet below the soil surface. You would then use the NRCS data to determine where the water table is and if land application is allowed.
  - b. Remove any reference to the water table from your management plan. The rule currently prohibits land application when the ground is saturated, so this covers a high-water table to some degree.
3. Part XIII. Certification page was not signed by the person completing the application. Please provide the signature of the person completing the application.
4. We've recently been given direction to address any laboratory reference methods used other than the methods outlined in 327 IAC 6.1-4-16. To use methods other than the methods listed in 327 IAC 6.1-4-16, we need to have a request for approval of equivalent methods on file. The analysis for total potassium indicates that it was done using the SW846-6010B method instead of EPA-600/4-79-020 (200).

Please confirm if you would like to request to use the methods SW846-6010B for total potassium as equivalent methods. Otherwise, you will need to instruct your laboratory to use the methods as required in 327 IAC 6.1-4-16.

5. Part IV indicates you would like to request both Class B, Alt 1: Monitoring of Indicator Organisms and Class B, Alt 2: Anaerobic Digestion, however fecal coliform results were not provided for review. In addition to the anaerobic digestion data, please provide fecal coliform analytical results if you would like to request this as an additional pathogen reduction method.

Please submit the above information within 30 days of the date of this e-mail. If you need additional time or have any questions, please let me know.

Thank you,  
Morrighan



Indiana Department of  
Environmental Management  
Morrighan O'Connell  
Environmental Manager II  
Office of Land Quality - Solid Waste Permits  
[moconnel@idem.IN.gov](mailto:moconnel@idem.IN.gov) (317) 232-3362

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## O'Connell, Morrighan

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**From:** Adam Downey <adowney@cbbel-in.com>  
**Sent:** Thursday, October 3, 2024 9:26 AM  
**To:** O'Connell, Morrighan  
**Cc:** Chris Yagelski  
**Subject:** FW: City of Michigan City 000051 Renewal Review  
**Attachments:** SKMBT\_C454e24100308360.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**EXTERNAL EMAIL:** This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

**Morrighan, please find responses below in red and feel free to call with questions or concerns:**

**-Adam**

**765-412-0625**

**From:** "O'Connell, Morrighan" <[MOconnel@idem.in.gov](mailto:MOconnel@idem.in.gov)>  
**Date:** October 2, 2024 at 2:30:24 PM CDT  
**To:** [dadowney@mcsan.org](mailto:dadowney@mcsan.org), [dadowney@gmail.com](mailto:dadowney@gmail.com)  
**Cc:** [cyagelski@mcsan.org](mailto:cyagelski@mcsan.org)  
**Subject:** **City of Michigan City 000051 Renewal Review**

Hi Adam,

I have reviewed the City of Michigan City's land application of biosolids renewal application. The following information is needed to complete my review:

1. Our records show Ms. Melissa Mullins was previously listed as your land application coordinator. Please confirm if this information is still accurate **This is out of date, apologies. Our Land Application Coordinator position is currently vacant and being handled by the Superintendent, currently myself: D. Adam Downey**
2. Part IX. and X refer to restrictions related to "areas known to have abnormally high-water tables at or near the surface". Please reference the conversation found here (VFC # [80015741](#)) related to issues using that terminology. You may revise the Stockpiling and Frozen/Snow covered ground management plan to reflect either:
  1. The Natural Resource Conservation Service's (NRCS) Soil Survey data reports the depth to the water table and any seasonally high-water tables during specific times of the year. You could revise your management plan to say that land application on frozen/snow covered ground will occur when the water table is XXX feet below the soil surface. You would then use the NRCS data to determine where the water table is and if land application is allowed.
  2. **Remove any reference to the water table from your management plan.** The rule currently prohibits land application when the ground is saturated, so this covers a

high-water table to some degree. Please strike the appropriate language as follows:

**C. SITE CHARACTERISTICS, INCLUDING: FLOOD PLAINS, WATER TABLE AND SLOPE**  
LAND APPLICATION WILL NOT OCCUR ON ANY LAND THAT EXCEEDS A 2% SLOPE, LAND APPLICATION WILL NOT OCCUR IN A FLOODPLAIN, ~~OR IN ABNORMALLY HIGH WATER TABLE AREAS,~~ AND ALL SITES WILL HAVE A ROUGH TILLED PERIMETER OR HEAVY FOLIAGE OR A BERM TO PREVENT THE MIGRATION OF BIO-SOLIDS.

regarding each of the following items:

**A. SETBACK DISTANCES FROM RESIDENCES AND PUBLIC BUILDINGS, SURFACE WATERS, WELLS, AND OTHER STRUCTURES**

STOCKPILING OF BIO-SOLIDS WILL NOT BE CONDUCTED WITHIN 200 FEET OF A ROADWAY.

STOCKPILING OF BIO-SOLIDS WILL NOT BE CONDUCTED WITHIN 660 FEET FROM NEIGHBORING RESIDENTS, OR 300 FEET UNLESS A SIGNED WAIVER IS OBTAINED.

STOCKPILING OF BIOSOLIDS WILL NOT BE CONDUCTED WITHIN 300 FEET OF SURFACE WATERS OR A SURFACE CONDUIT TO A SUBSURFACE FEATURE.

**B. SITE CHARACTERISTICS, INCLUDING: FLOOD PLAINS, WATER TABLE AND SLOPE**

ALL STOCKPILE SITES WILL HAVE A SLOPE OF 2 PERCENT OR LESS, AND THE SITE WILL BE BERMED TO PREVENT RUNOFF, WHEN NECESSARY.

BIOSOLIDS WILL NOT BE STOCKPILED IN FLOODPLAINS ~~OR AREAS KNOWN TO HAVE ABNORMALLY HIGH WATER TABLES AT OR NEAR THE SURFACE.~~

**C. HANDLING PRACTICES, INCLUDING: LENGTH OF TIME TO BE STOCKPILED, RUNOFF CONTROL MEASURES AND BERM CONSTRUCTION**

3. Part XIII. Certification page was not signed by the person completing the application. Please provide the signature of the person completing the application. **Please find attached**
4. We've recently been given direction to address any laboratory reference methods used other than the methods outlined in 327 IAC 6.1-4-16. To use methods other than the methods listed in 327 IAC 6.1-4-16, we need to have a request for approval of equivalent methods on file. The analysis for total potassium indicates that it was done using the SW846-6010B method instead of EPA-600/4-79-020 (200).

Please confirm if you would like to request to use the methods SW846-6010B for total potassium as equivalent methods. Otherwise, you will need to instruct your laboratory to use the methods as required in 327 IAC 6.1-4-16. **Our lab manager is writing a response to this, I will send it over ASAP**

5. Part IV indicates you would like to request both Class B, Alt 1: Monitoring of Indicator Organisms and Class B, Alt 2: Anaerobic Digestion, however fecal coliform results were not provided for review. In addition to the anaerobic digestion data, please provide fecal coliform analytical results if you would like to request this as an additional pathogen reduction method.  
**Please strike the request to use indicator organisms, we will only use anaerobic digestion. I had intended to leave the option open for future but the digestion method is fine by itself.**

Please submit the above information within 30 days of the date of this e-mail. If you need additional time or have any questions, please let me know.

Thank you,  
Morrighan



Indiana Department of  
Environmental Management

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Morrighan O'Connell

*Environmental Manager II*

*Office of Land Quality - Solid Waste Permits*

[moconnel@idem.IN.gov](mailto:moconnel@idem.IN.gov) (317) 232-3362

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**PART XIII. CERTIFICATION**


"Application is hereby made for a permit to authorize the activities described herein. I certify that I am familiar with the information contained in this application, and to the best of my knowledge and belief, such information is true, complete, and accurate."

*Refer to IC 13-30-10 for penalties for submission of false information.*

**A. SIGNATURE**



**D. SIGNATURE OF PERSON COMPLETING APPLICATION**

  
DAVID ADAM DEWITT

**B. PRINTED NAME AND OFFICIAL TITLE**  
*(print or type)*

CHRISTOPHER YAGELSKI, GENERAL  
MANAGER

Do you want the opportunity to review a draft permit prior to permit issuance?

Yes     No

**C. DATE SIGNED**

7-24-24

*An application submitted by a municipality must be signed by a ranking elected official (mayor, town council president, etc.) or other duly authorized person. Documentation of such authorization must be submitted with the application if signed by someone other than the elected official.*

*An application submitted by a corporation must be signed by a principal executive officer of at least vice president level or their duly authorized representative. However, such representative must be responsible for the complete operation of the facility for which the permit is being secured (i.e., General Manager). In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or a proprietor.*

**From:** [Adam Downey](#)  
**To:** [O'Connell, Morrighan](#)  
**Cc:** [Chris Yagelski](#); [Sue Lehman](#)  
**Subject:** Re: City of Michigan City 000051 Renewal Review  
**Date:** Tuesday, October 15, 2024 11:30:43 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)

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Correct.

Sent from my iPhone

On Oct 15, 2024, at 9:38 AM, O'Connell, Morrighan <[MOconnel@idem.in.gov](mailto:MOconnel@idem.in.gov)> wrote:

Hi Adam,

We typically approve Standard Methods as they are on EPA's approved methods list. However, our rule is a bit outdated when it comes to analytical methods, so anything not listed in our rule now has to be requested as an equivalent method. To confirm: you would like to request SM 6010 B as an equivalent method for potassium?

Morrighan O'Connell  
Environmental Manager II  
Office of Land Quality - Solid Waste Permits  
[moconnel@dem.in.gov](mailto:moconnel@dem.in.gov)  
(317) 232-3362

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**From:** Adam Downey <[adowney@cbbel-in.com](mailto:adowney@cbbel-in.com)>  
**Sent:** Tuesday, October 8, 2024 3:55 PM  
**To:** O'Connell, Morrighan <[MOconnel@idem.IN.gov](mailto:MOconnel@idem.IN.gov)>  
**Cc:** Chris Yagelski <[cyagelski@mcsan.org](mailto:cyagelski@mcsan.org)>; Sue Lehman <[slehman@mcsan.org](mailto:slehman@mcsan.org)>  
**Subject:** Re: City of Michigan City 000051 Renewal Review

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Morrighan:

Please note our laboratory uses Standard Method 6010 B for Potassium (K) which should be approved. There appears to have been a typo regarding method 6010 B vs 6010 D

—  
However, looking at it for a little bit, I find this page which is the EPA's list of approved methods.

<https://www.epa.gov/hw-sw846>

6010 D is listed as approved for Potassium. Sue mentions using 6010 B, not D.

-Adam

Sent from my iPhone

On Oct 8, 2024, at 8:48 AM, O'Connell, Morrighan  
<[MOconnel@idem.in.gov](mailto:MOconnel@idem.in.gov)> wrote:

Thanks Adam! I will review and let you know if any additional information is needed.

Morrighan O'Connell  
Environmental Manager II  
Office of Land Quality - Solid Waste Permits  
[moconnel@idem.in.gov](mailto:moconnel@idem.in.gov)  
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**Cc:** Chris Yagelski <[cyagelski@mcsan.org](mailto:cyagelski@mcsan.org)>  
**Subject:** FW: City of Michigan City 000051 Renewal Review

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**Date:** October 2, 2024 at 2:30:24 PM CDT

**To:** [dadowney@mcsan.org](mailto:dadowney@mcsan.org), [dadowney@gmail.com](mailto:dadowney@gmail.com)

**Cc:** [cyagelski@mcsan.org](mailto:cyagelski@mcsan.org)

**Subject:** City of Michigan City 000051 Renewal Review

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<image001.png>

<image002.png>

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Thank you,  
Morrighan

<image003.png> Indiana Department of Environmental Management  
Morrighan O'Connell  
Environmental Manager II  
Office of Land Quality - Solid Waste Permits  
[moconnel@idem.IN.gov](mailto:moconnel@idem.IN.gov) (317) 232-3362

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<image007.png>  
<image008.png>  
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**From:** [Adam Downey](#)  
**To:** [Chris Yagelski](#); [O'Connell, Morrighan](#)  
**Subject:** RE: City of Michigan City 000051 Renewal Review  
**Date:** Thursday, December 12, 2024 9:10:19 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Morrigan:

Please note that "SANITARY DISTRICT OF MICHIGAN CITY" is the official name of the legal organization in charge of the Permit and all activities, it is a division of the City of Michigan City.

Thank you,  
-Adam

#### **D. Adam Downey, MS**

---

**From:** Chris Yagelski <[cyagelski@mcsan.org](mailto:cyagelski@mcsan.org)>  
**Sent:** Tuesday, December 10, 2024 8:33 AM  
**To:** Adam Downey <[adowney@cbbel-in.com](mailto:adowney@cbbel-in.com)>  
**Subject:** FW: City of Michigan City 000051 Renewal Review

Can you verify ?

Chris

---

**From:** O'Connell, Morrighan <[MOconnel@idem.IN.gov](mailto:MOconnel@idem.IN.gov)>  
**Sent:** Tuesday, December 10, 2024 7:31 AM  
**To:** Chris Yagelski <[cyagelski@mcsan.org](mailto:cyagelski@mcsan.org)>  
**Subject:** City of Michigan City 000051 Renewal Review

**CAUTION:** This email originated from outside of the Sanitary District of Michigan City. Do not click links or open attachments unless you recognize the sender and believe the content is safe.

Hi Chris,

I am working on finalizing your permit draft and I have two additional questions for you.

1. The previous permit was issued to the City of Michigan City. The current application lists the Michigan City Sanitary District. Please confirm if the permit should continue to be issued to the City of Michigan City.
2. Our records show land application is coordinated through the Sanitary District of Michigan City. The letterhead provided in the application also lists the Sanitary District of Michigan City, whereas the application lists Michigan City Sanitary District. Please confirm if land application is coordinated through the Sanitary District of Michigan City or the Michigan City Sanitary District.

Thanks!  
Morrighan



Indiana Department of  
Environmental Management  

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Morrighan O'Connell  
Senior Environmental Manager  
Office of Land Quality - Solid Waste Permits  
[moconnel@idem.IN.gov](mailto:moconnel@idem.IN.gov) (317) 232-3362

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