



TOWN OF HUNTERTOWN

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21 June 2024

Indiana Department of Environmental Management
Office of Water Quality
Attn: Kim Rohr, Chief, Wastewater Inspection Section
100 North Senate Avenue
Indianapolis, IN 46204
wwViolationResponse@idem.IN.gov

Subject: Town of Huntertown Inspection Summary / Noncompliance Letter
Response Documenting Correction / Plan for Compliance

Dear Ms. Rohr:

Thank you to you and all the IDEM team for the inspection, summary, and coordination to date regarding the Huntertown wastewater utility compliance evaluation. Per your request in your May 22 letter, we are pleased to submit the following responses documenting corrective measures for these concerns. For your convenience, this letter is formatted with your comments in italics, followed by Town comments in blue.

Concern #1

The Collection System evaluation was rated as unsatisfactory. Part II.B.1 of the permit requires the facility to implement an ongoing preventative maintenance and repair history for the collection system, including sewer lines, manholes and lift stations.

During the inspection it was noted that less than approximately 30% of the total collection system has been electronically mapped, with the rest being represented by various forms of paper maps that were supplied by builders. Those maps are not standardized nor organized in a way that facilitates planning and documenting preventative maintenance and repair activities. In order for staff to develop and implement a long term Sanitary Sewer and Lift Station Maintenance Program, the Town must develop a standard mapping system for the entire collection system that is updated on a regular basis as the collection system expands. The Sanitary Sewer and Lift Station Maintenance Program will also need to include a schedule for and documentation of completed sewer cleaning, sewer repairs, manhole inspections/repairs, I/I removal/plan in the 'old area', and all lift station preventative maintenance and repair history.

The lack of a long term, all-inclusive collection system and lift station maintenance program was documented during inspections conducted on April 27, 2021 and April 20, 2022. This concern must be addressed.

Complete details on the Collection System evaluation can be found on the enclosed Inspection Report.

The Town collection system is fully electronically mapped, with AutoCAD DWG, ESRI ArcGIS, and PDF format electronic mapping files updated on a regular basis as ongoing development progresses. See the following



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OneDrive link to the latest PDF mapping: [2024-05-30 HT-UTILITY MAPS \(11x17\)](#). Observe that “planned”, not-yet-constructed facilities are included in the mapping as noted in the legend. The mapping is organized with a cover sheet, an index sheet showing an overall key plan view of the utility area identifying indexed locations for reference for detailed mapping, and detailed maps of specific areas. In response to inspection comments, the Town has posted an overall wall map of the utility at its maintenance facility. See the following link to wall mapping: [2024-06-07 Huntertown Sanitary Map 2024-36x48 Landscape.pdf](#).

The Town has historically followed a collection system maintenance program, but to address the concerns raised by IDEM has now formalized a maintenance program. Please see the following linked maintenance program: [Maintenance and Inspection Program.pdf](#).

- Lift station pump run times are recorded on a daily basis via telemetry, with automated weekly reports of daily run times. Lift stations are checked on a weekly basis (wet well, panel, floats / level sensors, alarms). Pumps are replaced as necessary based on evaluations of run times as impellers age. An electronic GIS-based tracking system recording date of inspection, initials of the inspector, and findings is under development for field staff (see tablet discussion below). The same system will log repairs and cleaning.
- Gravity sewers are to be cleaned and jetted based in a ten-year cycle, with the collection system subdivided into annual cleaning zones prioritized by age. See the following map of annual inspection zones: [2024-06 HT Collection System Annual Maintenance Zones.pdf](#). Manholes are to be inspected for debris, corrosion, and evidence of I&I during this annual cycle.

The Town is in the process of purchasing four (4) tablets for field staff with cellular cards for data connection. Authorized users of these tablets will have either full edit or view-only access to the Town GIS mapping, depending on training and seniority, and can log field observations and full edit licenses will allow inspections to be logged electronically on the tablets via ESRI Field Maps software.

The Town to date has maintained paper records of maintenance. See the following example of records for September 2023 through February 2024: [Huntertown Lift Station Inspections September 2023 - February 2024.pdf](#). This system will be replaced by the electronic GIS-based system discussed above.

The Town will be dedicating \$75,000 in its 2025 budget to I&I removal. I&I removal investigations will commence with the oldest central portion of Huntertown, where I&I is most likely to occur.

Concern #2

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

Month	Year	Outfall	Parameter	Number
March	2023	001	Ammonia Nitrogen	6
April	2023	001	Ammonia Nitrogen	2

The Town closely monitors ammonia nitrogen levels and consistently meets limits. Regarding this incident, as reported by the Town in its noncompliance 24-hour notification report, on 3/24/2023 the WWTP started to experience a spike in effluent ammonia-nitrogen levels. At first the Town suspected a wet weather / high flow event was impacting the levels, but levels stayed persistently high after flows subsided. All other parameters seemed to be in order compared to normal operations for nitrifying (MLSS, temperature, pH, alkalinity, BOD). The rapid deterioration of nitrification and lack of re-establishment given typical operating conditions indicates that toxicity was the most likely cause. The Town raised DO levels in the oxidation ditch and slowed wasting from the system to aid the process of reestablishing the nitrifying bacteria. The Town investigated and reached out to potential toxicity sources to see if there was an unauthorized chemical release but was not able to identify the source. The Town has reviewed any other potential causes that could be prevented through plant operations.

Please review and let us know if you have any questions. If you need any additional information, please contact me directly at (260) 348-0498 or Tony.Ramey@huntertown.in.gov. Thank you.

Sincerely,



Tony Ramey
Utility Service Board President