



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 21, 2024

Via Email to: tcoleman@dnr.in.gov

Mr. Terry Coleman, Director of State Parks and Reservoirs
Indiana Department of Natural Resources
401 W. Washington Street
Indianapolis, Indiana 46024

Dear Mr. Coleman:

Re: Inspection Summary/ Noncompliance Letter
Brown County State Park WWTP
NPDES Permit No. IN0030325
Nashville, Brown County

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

Date(s) of Inspection: June 19, 2024
Type of Inspection: Reconnaissance Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

1. Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.

The facility sends waste activated sludge (WAS) from the secondary clarifier to the influent EQ tank. The facility has no working digester to allow proper wasting of sludge. Rather than hauling out concentrated sludge from a properly maintained digester, a mixture of mixed liquor and raw wastewater is removed from the facility's Influent EQ tank. The facility contracts a septic hauler to pump approximately 3,000 gallons per week from the EQ tank. This is not optimal operations/wasting.

At the time of the inspection, the clarifier contained a significant amount of floating solids. Also, the sand filters are not on-line and have been bypassed for years. (See also Maintenance)

2. Maintenance was rated as unsatisfactory due to the facility having the

aerobic digester and four sand filter beds out of service due to mechanical failure. This is a violation of Part II. B. 1 of the permit which requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

The facility must:

- A. Repair the aerobic digester to make it usable and start wasting into it and not the EQ tank.
 - B. Evaluate sand filter beds for proper operation. The sand filter beds were installed in early 2000's and have not been operated in years.
 - C. Investigate if clarifier is short circuiting during higher flows allowing for loss of solids to outfall.
 - D. If clarifier is not losing solids, bring sand filter beds back online. If solids are being lost from the clarifier, that problem must be resolved prior to bringing sand filter beds online.
 - E. Maximize the EQ tank's holding capacity during high flow days.
3. 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
May	2024	001	Ammonia Nitrogen	1
November	2023	001	TSS	1
November	2023	001	Ammonia Nitrogen	1
October	2023	001	Ammonia Nitrogen	2
October	2023	001	E. coli	1

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 Kevin Stark at 812-525-9411 or by email to kstark@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Handwritten signature of Kim Rohr in black ink.

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0030325		Facility Type: State/Federal		Facility Classification: Minor		TEMPO AI ID	
Date(s) of Inspection: June 19, 2024							
Type of Inspection: Reconnaissance Inspection							
Name and Location of Facility Inspected: Brown County State Park WWTP 1405 SR 46 West Nashville IN 47448				Receiving Waters: UNT to Schooner Creek		Permit Expiration Date: 12/31/2025	
County: Brown						Design Flow: 0.04MGD	
On Site Representative(s): No facility rep was met at the site.							
Was a verbal summary of findings presented to the on-site representative?							
Certified Operator: Jeff Keaton		Number: 21099	Class: I	Effective Date: 2-3-22	Expiration Date: 6-30-25	Email: jkeaton@dnr.in.gov	
Cyber Security Contact: Name: NA Email:							
Responsible Official: Mr. Terry Coleman, Director of State Parks and Reservoirs 401 W. Washington Street Indianapolis, Indiana 46024				Permittee: Indiana Department of Natural Resources Email: tcoleman@dnr.in.gov Phone: 317-232-4140 Fax:			
				Contacted?		No	
INSPECTION FINDINGS							
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Potential problems were discovered or observed. (3) <input checked="" type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
AREAS EVALUATED DURING INSPECTION							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
N	Receiving Waters	N	Facility/Site	N	Self-Monitoring	N	Enforcement
S	Effluent	U	Operation	N	Flow Measurement	N	Pretreatment
S	Permit	U	Maintenance	N	Laboratory	U	Effluent Limits Compliance
N	Collection System	N	Sludge Disposal	S	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
Effluent:							
Comments: The effluent was clear and free of color at the time of the inspection.							
Permit:							
Comments: The facility was found to have a valid permit and the facility description, including units of treatment and receiving stream, is accurate. However, there are two units of treatment listed in the Permit's Treatment Facility Description that are not online; the four sand filter beds and the aerobic digester. (see Operations & Maintenance)							
Operation:							
Comments: Operation was rated as unsatisfactory. Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.							
The facility sends waste activated sludge (WAS) from the secondary clarifier to the influent EQ tank. The facility has no working digester to allow proper wasting of sludge. Rather than hauling out concentrated sludge from a							

properly maintained digester, a mixture of mixed liquor and raw wastewater is removed from the facility's Influent EQ tank. The facility contracts a septic hauler to pump approximately 3,000 gallons per week from the EQ tank. This is not optimal operations/wasting.

At the time of the inspection, the clarifier contained a significant amount of floating solids. Also, the sand filters are not on-line and have been bypassed for years. (See also Maintenance)

Maintenance:

Comments:

Maintenance was rated as unsatisfactory due to the facility having the aerobic digester and four sand filter beds out of service due to mechanical failure. This is a violation of Part II. B. 1 of the permit which requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

The facility must:

- A. Repair the aerobic digester to make it usable and start wasting into it and not the EQ tank.
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- E. Maximize the EQ tank's holding capacity during high flow days.

Records/Reports:

The following records/reports were reviewed:

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

Comments:

The requested records were available and appeared to be complete and accurate.

Effluent Limits Compliance:

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

DMRs for the period of October 2023 to March 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
May	2024	001	Ammonia Nitrogen	1
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October	2023	001	Ammonia Nitrogen	2
October	2023	001	E. coli	1

Comments:

IDEM REPRESENTATIVE

Inspector Name:

Kevin Stark

Email:

kstark@idem.IN.gov

Phone Number:

812-525-9411

Other staff participating in the inspection:

Name(s)

Aaron Deeter

Phone Number(s)

317-691-1915

IDEM MANAGER REVIEW

IDEM Manager:

Kim Rohr

Date:

6/21/2024