



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 25, 2024

Via Email to: bdawson@townofwheatland.in
Mr. Brett Dawson, Town Council President
Town of Wheatland
P.O. Box 219
Wheatland, Indiana 47597

Dear Mr. Dawson:

Re: Inspection Summary/ Noncompliance Letter
Wheatland Water Works
NPDES Permit No. IN0064777
Wheatland, Knox 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 24, 2024
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

Laboratory was rated unsatisfactory. In accordance with 327 IAC 5-1-3, your facility was required to participate in the DMRQA 42 Laboratory Proficiency Study in 2022. To date, this information has not been received. For additional information regarding this data, please reach out to Maggie Kroeger at Mkroeger@idem.IN.gov.

Also, Part I. C. 4. of the permit requires the analytical and sampling methods used to conform to the current version of 40 CFR, Part 136, unless otherwise specified. For Total Iron, a digestion must be performed prior to analysis of the sample. If the facility does not perform a digestion, a contract lab must be used for analysis of Total Recoverable Iron.

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 Holly Zurcher at 317-954-8028 or by email to hzurcher@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Handwritten signature of Kim Rohr in black ink, consisting of the letters 'K', 'G', and 'R' in a cursive style.

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure

- S 1. Did the facility have a copy of the current permit available for reference.
- S 2. If the permit expires within 180 days, has a renewal application been submitted?
- S 3. Receiving waters are accurately described in the permit.
- 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 Permit evaluation generated a marginal rating. The current permit states that the wastewater is not treated prior to discharge. The facility has constructed a settling basin to provide basic settling of the facility's backwash prior to discharge. This discrepancy must be corrected through the NPDES permit renewal.

It is noted that the facility does have the required certified operator.

Facility/Site:

- N 1. The facility was found to have standby power or equivalent provision, If required.
- N 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility.
- S 3. Safe and adequate access was provided for inspection of all treatment units and outfalls.
- S 4. Facilities and equipment did not appear beyond their useful life.
- 5. List any safety concerns noted during the inspection in the box below:

Comments:

The settling basin does not require back-up power or alarms.

Operation:

- S 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including 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 were adequate.
- N 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

The settling basin appears to be operated efficiently.

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 adequate.

Comments:

The settling basin maintenance appears adequate.

Sludge:

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

Comments:

No solids were removed from the basin during the review period.

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, include:
 - a. Samples refrigerated during compositing.
 - b. Proper preservation techniques used.
 - c. Containers and holding times conform to 40 CFR 136.3.
- S 5. Sample documentation was adequate and includes:
 - 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 Total Toxic Organic (TTO) requirements were being met.
- N 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices are conducted accurately and at the frequency required by the permit. Facility drinking water staff time backwashes when the wastewater operator can be present to grab a sample. Due to relatively dry conditions, very few discharges occurred during the review period.

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.

Comments:

The facility's flow measurement program, including all documentation, is adequate and representative. Reported effluent flow is estimated based on the gallons of backwash, which is a conservative measurement.

Laboratory:

The following laboratory records were reviewed:

TSS Bench Sheets pH Bench Sheets Iron Bench Sheets

- U 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 used.
 - d. Calibration and maintenance of instruments was adequate.
 - e. QA/QC procedures were adequate.
 - f. Dates of analyses (and times, where required) were recorded.
 - g. Name of person performing analyses was recorded.

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

Comments:

Laboratory was rated unsatisfactory. In accordance with 327 IAC 5-1-3, your facility was required to participate in the DMRQA 42 Laboratory Proficiency Study in 2022. To date, this information has not been received. For additional information regarding this data, please reach out to Maggie Kroeger at Mkroeger@idem.IN.gov.

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Records/Reports:

The following records/reports were reviewed:

DMRs for the period of June 2023 to May 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 MMRs were 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 are adequate.

Comments:

The requested records were available and appear complete and accurate.

Enforcement:

- N 1. Agreed Order compliance milestones have been met.

2019-26484-W

Tessa Scalzo, TScalzo@IDEM.in.gov, 317-233-5975

Comments:

The facility is current with all milestones in the Agreed Order. Construction on the new WWTP and sewer lines is well underway.

Effluent Limits Compliance:

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

DMRs for the period of June 2023 to May 2024 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

There were no reported effluent limit exceedances during the review period.

IDEM REPRESENTATIVE

Inspector Name:

Holly Zurcher

Email:

hzurcher@idem.IN.gov

Phone Number:

317-954-8028

IDEM MANAGER REVIEW

IDEM Manager:

Kim Rohr

Date:

6/25/2024

Inspection Photographs



Facility: Wheatland Water Works
Photographer: Holly Zurcher
Date: 06/24/2024 Time:
Others Present:
Location/Description: New main lift station and WWTP construction has started and is on track with CP.



Facility: Wheatland Water Works
Photographer: Holly Zurcher
Date: 06/24/2024 Time:
Others Present:
Location/Description: New individual grinder pumps are waiting to be installed at each home.