



## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
*Governor*

**Brian Rockensuess**  
*Commissioner*

June 28, 2024

Via Email to: [nicholas.tipple@lightstonegen.com](mailto:nicholas.tipple@lightstonegen.com)  
Mr. Nick Tipple, General Manager  
Lawrenceburg Power LLC  
582 W Eads Pkwy  
Lawrenceburg, Indiana 47025

Dear Mr. Tipple:

Re: Inspection Summary Letter  
Lawrenceburg Power LLC  
NPDES Permit No. IN0060950  
Lawrenceburg, Dearborn 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 26, 2024  
Type of Inspection: Compliance Evaluation Inspection  
Inspection Results: Potential problems were discovered or observed.

A copy of the NPDES Industrial Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Becky Ruark at 317-691-1909 or by email to [bruark@idem.IN.gov](mailto:bruark@idem.IN.gov).

Sincerely,

Kim Rohr, Chief  
Wastewater Inspection Section  
Office of Water Quality

Enclosure



# NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0060950</b>		Facility Type: Industrial Major		Facility Classification: A-SO		TEMPO AI ID	
Date(s) of Inspection: June 26, 2024							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: <b>Lawrenceburg Power LLC</b> 582 W Eads Pkwy Lawrenceburg IN 47029				County: Dearborn Receiving Waters/POTW: Ohio River		Permit Expiration Date: 12/31/2027 Design Flow: NA	
On Site Representative(s):							
First Name	Last Name	Title	Email	Phone			
Jeff	Darling	EHS Manager	jeffrey.darling@lightstonegen.com				
Nick	Tipple	General Manager	nicholas.tipple@lightstonegen.com				
Dustin	Ketchem	O&M Superintendent	james.ketchem@lightstonegen.com				
Was a verbal summary of the inspection given to the on-site rep? <b>Yes</b>							
Certified Operator: J. Dustin Ketchem		Number: 19190	Class: D	Effective Date: 7-1-21	Expiration Date: 6-30-24	Email: james.ketchem@lightstonegen.com	
Cyber Security Contact							
Name: _____				Email: _____			
Responsible Official: Mr. Nick Tipple, General Manager 582 W Eads Pkwy Lawrenceburg, Indiana 47025				Permittee: Lawrenceburg Power LLC Email: nicholas.tipple@lightstonegen.com Phone: _____ Fax: _____			
				Contacted? Yes			
<b>INSPECTION FINDINGS</b>							
<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 checked="" type="radio"/> Potential problems were discovered or observed. (3) <input 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)							
<b>AREAS EVALUATED DURING INSPECTION</b>							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
N	Receiving Waters	S	Facility/Site	M	Self-Monitoring	N	Enforcement
S	Effluent/Discharge	S	Operation	S	Flow Measurement		
S	Permit	S	Maintenance	S	Laboratory	S	Effluent Limits Compliance
		S	Sludge	M	Records/Reports	S	Other: Cooling Water Intake Structure
<b>DETAILED AREA EVALUATIONS</b>							
<b>Receiving Waters:</b>							
<input checked="" type="checkbox"/> 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam. Comments: The facility discharges into a lift station where effluent from two other facilities mixes before being pumped to the Ohio River.							
<b>Effluent/Discharge:</b>							
<input checked="" type="checkbox"/> 1. Final effluent was essentially free of excessive solids, floating debris, oil, scum, or billowy foam. <input checked="" type="checkbox"/> 2. Pretreatment discharge into sanitary sewers appeared free of excessive oils, grease, solids, or foam and did not appear to be in violation of the local Sewer Use Ordinance. <input checked="" type="checkbox"/> 3. Pretreatment discharge into sanitary sewers did not contain materials that pass through or interfere with the operation of the POTW.							

**Evaluation of Multiple Outfalls:**

Outfall #	Insp. Date	Outfall Inspection Comments
001	6/26/2024	The discharge from 001 was observed and appeared clear and free of excessive solids, algae, and oil.
101	6/26/2024	The pump was not running at the time of the inspection, so no discharge was observed.
102	6/26/2024	The discharge from 102A, 102 C, and 101D were observed and appeared clear and free of excessive solids, algae, and oil. There was no discharge from the sampling port on 102B at the time of this inspection

Comments:

**Permit:**

- S 1. Did the facility have a copy of the current permit available for reference.
- N 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 facility has a valid permit.

**Facility/Site:**

- S 1. The facility was found to have standby power or equivalent provision, If required.
- S 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 facility and treatment units were accessible for inspection. Alternative power is available. A SCADA system alerts operator of problems in the system. An internal pH monitor shuts down discharge if the pH is outside of the expected range.

**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:

An oil/water separator is the only treatment prior to discharge. The system is maintained for adequate treatment.

**Maintenance:**

- S 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:

Preventative maintenance and repairs are tracked with an electronic database. All equipment appeared to be satisfactorily maintained.

**Sludge:**

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

Comments:

Waste oil is removed from the oil/water separator by facility staff. It is transferred to a waste oil bulk tank. The oil from the waste oil bulk tank is hauled by Heritage-Crystal Clean to their Cincinnati, OH facility for disposal. Waste oil was hauled out in March 2023 and August 2023 and manifests were available for review.

**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.
- M 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.
- S 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

The Self Monitoring Program was rated as marginal. For Outfall 102, there are four sampling points labeled 102A, 102B, 102C, and 102D. Facility personnel collect a representative sample from each of the sample locations. A time should be recorded for each aliquot of sample collected. All four aliquots must be collected within 15 minutes start to finish to meet the definition of a grab sample. Recording times will document that this is done appropriately. During the inspection, the Sampling SOP was revised to make the procedure more clear.

All other samples were clearly documented and were at the required frequency.

**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 appeared adequate and representative. Flow meters for Outfalls 001, 101, and 201 were calibrated in house on October 25, 2023.

**Laboratory:**

The following laboratory records were reviewed:

pH Bench Sheets	pH Calibration Data	Total Residual Chlorine Benc
Total Residual Oxidants Ben	Contract Lab Reports	Chain-of-Custody

- N 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.

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

**Contract Lab Information**

Pace Analytical	Indianapolis, IN
Enviroscience Inc	Stow, OH

Comments:

The bench sheets for pH, TRO and TRC reviewed during the inspection appeared to be accurate and complete. Lab reports and chain of custody documents for lab work done by Pace were reviewed. All appeared to be accurate and complete.

**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.
- M 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 Records/Reports evaluation generated a marginal rating. Most records appeared to be complete and accurate. When quarterly monitoring is conducted it is usually done in the first month of the quarter. Facility personnel were misinterpreting the footnote indicating that data should be reported on the DMR for the last month of the quarter. The data was being reported on the MMR for the last month of the quarter. For example January data was being reported on the March MMR. This is incorrect. Going forward, the data must be put on the MMR for the month in which monitoring occurred. Then the data must be entered on the quarterly DMR.

**Enforcement:**

N 1. Agreed Order compliance milestones have been met.

Comments:

There was no Agreed Order at the time of the inspection.

**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:

No effluent limit violations were noted on DMRs reviewed for this inspection.

**Other:**

**Cooling Water Intake Structure**

Comments:

The facility withdraws water from Tanners Creek through a 42 inch Johnson Wedgewire Screen. It is designed to intake flow velocities below 0.5 fps. The permittee submitted an annual certification on January 15, 2024 for 2023. The report indicated that no significant changes were made from the previously specified operation of the cooling water intake structure.

**IDEM REPRESENTATIVE**

Inspector Name:

Email:

Phone Number:

Becky Ruark

bruark@idem.IN.gov

317-691-1909

Other staff participating in the inspection:

Name(s)

Phone Number(s)

Jeremy Ferguson

812-582-0696

**IDEM MANAGER REVIEW**

IDEM Manager:

Date:

Kim Rohr

6/27/2024