



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 28, 2024

Via Email to: krooks@morgantown.in.gov
Mr. Kyle Rooks, Superintendent
Town of Morgantown
120 W. Washington St.
Morgantown, Indiana 46160

Dear Mr. Rooks:

Re: Inspection Summary/ Noncompliance Letter
Morgantown WWTP
NPDES Permit No. IN0036820
Morgantown, Morgan 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 27, 2024
Type of Inspection: Reconnaissance Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Collection System area was rated as unsatisfactory due to the facility failing to provide adequate collection system maintenance documentation. This is a violation of Part II. B. 1. e of the permit which requires the facility to have an ongoing preventative maintenance program for the sanitary sewer system. Specifically, current lift station inspections that occur weekly are not being documented every time they are completed. During the inspection, only one lift station inspection for the last nine weeks was documented, and it was only a note on an iPhone, nothing printed out or in a file for review.

Additionally, the collection system has two SSO points; 002 & 003. Upon records review, required visual inspections of SSO points are not being documented. Visual inspections must be documented per permit requirements. Attachment A of the current permit states; permittee shall monitor discharges from each outfall listed above by visual inspection of each listed SSO outfall within 24 hours of receiving 0.25 inches of precipitation or greater within a 24 hour period as recorded at the nearest National Weather Service Reporting Station. Permittee shall maintain a record of each visual inspection on-site for a period of five (5) years.

Records of the visual inspections shall be made available to IDEM and/or EPA staff upon request. At the time of the inspection, this data was combined with the collection system maintenance note on an iPhone and there was only documentation for one singular check conducted, despite a review of the National Weather Service reporting station data showing that eleven occurrences of .25 inches of rain or greater have occurred since the previous inspection. The town has been cited for this violation on numerous consecutive inspection reports, and the most recent town response assured IDEM that this violation was resolved and every instance of investigation would be documented moving forward, but the violation continues to persist.

All SSO overflow checks and collection system maintenance checks and task completions must be documented in writing and those documents must be made available for review moving forward, any missing information from this point on will be considered an immediate violation and subject the town to further enforcement actions.

2. Facility/Site was rated unsatisfactory due to the effluent flow control gate allowing flow to pass through even though it is closed. Part II. B. 1. b. of the permit requires that the facility be operated in a manner which will minimize discharges of excessive pollutants. Currently, an undetermined amount of flow is leaving the pond and discharging without receiving proper disinfection and without the required sampling occurring. The town must investigate the cause of flow being discharged when the pond valves are supposed to be closed off and should take steps to either stop the flow from being discharged out the outfall or sample and report it as required by permit.
3. The effluent flow meter was last calibrated in September 2023. Despite being within the calibration window, flow could easily be heard leaving the lagoon while the flow meter showed 0.0 GPM (this issue is also in the facility/site section of the inspection report), so there may be an issue with the meters ability to detect low-flow conditions. The town should mention this during the next flow meter calibration if they determine that the flow is in fact passing through the flow meter and not getting around the flume somehow.

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.

Effective immediately, IDEM is initiating a program strongly encouraging domestic wastewater utilities to perform cybersecurity vulnerability assessments, and to take actions to mitigate identified vulnerabilities and increase the cybersecurity resilience of Indiana's water sector. Utilities can choose any assessment tool appropriate for the water sector, but IDEM is highlighting the following websites for information and helpful vulnerability assessment tools

made available from the U.S. EPA and the American Water Works Association:
<https://www.epa.gov/waterresilience/epa-cybersecurity-water-sector>
and <https://www.awwa.org/Resources-Tools/Resource-Topics/Risk-Resilience/Cybersecurity-Guidance>. IDEM will continue to share important updates on the cybersecurity of the water sector.

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 Jason Palin at 317-504-0007 or by email to japalin@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: IN0036820		Facility Type: Municipality		Facility Classification: Minor		TEMPO AI ID I-SP	
Date(s) of Inspection: June 27, 2024							
Type of Inspection: Reconnaissance Inspection							
Name and Location of Facility Inspected: Morgantown WWTP Pond Road Morgantown IN 46160				Receiving Waters: Indiana Creek		Permit Expiration Date: 7/31/2028 Design Flow: 0.160MGD	
On Site Representative(s): First Name: Kyle, Last Name: Rooks, Title: Superintendent, Email: krooks@morgantown.in.gov, Phone: _____				Was a verbal summary of findings presented to the on-site representative? Yes			
Certified Operator: Robert Capo		Number: 21650	Class: III	Effective Date: 7-1-24	Expiration Date: 6-30-24	Email: rcapo@townofbargersville.org	
Cyber Security Contact: Name: _____ Email: _____							
Responsible Official: Mr. Kyle Rooks, Superintendent 120 W. Washington St. Morgantown, Indiana 46160				Permittee: Town of Morgantown Email: krooks@morgantown.in.gov Phone: _____ Fax: _____		Contacted? Yes	
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>							
S	Receiving Waters	U	Facility/Site	N	Self-Monitoring	N	Enforcement
N	Effluent	N	Operation	M	Flow Measurement	S	Pretreatment
S	Permit	N	Maintenance	S	Laboratory	N	Effluent Limits Compliance
U	Collection System	S	Sludge Disposal	N	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
Receiving Waters:							
Comments: The receiving stream was free of notable foam, algae or solids.							
Permit:							
Comments: The facility was found to have a valid permit and the facility description, including units of treatment and receiving stream, is accurate.							
Collection System:							
Comments: The Collection System area was a rated as unsatisfactory due to the facility failing to provide adequate collection system maintenance documentation. This is a violation of Part II. B. 1. e of the permit which requires the facility to have an ongoing preventative maintenance program for the sanitary sewer system. Specifically, current lift station inspections that occur weekly are not being documented every time they are completed. During the inspection, only one lift station inspection for the last nine weeks was documented, and it was only a note on an iphone, nothing printed out or in a file for review. Additionally, the collection system has two SSO points; 002 & 003. Upon							

records review, required visual inspections of SSO points are not being documented. Visual inspections must be documented per permit requirements. Attachment A of the current permit states; permittee shall monitor discharges from each outfall listed above by visual inspection of each listed SSO outfall within 24 hours of receiving 0.25 inches of precipitation or greater within a 24 hour period as recorded at the nearest National Weather Service Reporting Station. Permittee shall maintain a record of each visual inspection on-site for a period of five (5) years. Records of the visual inspections shall be made available to IDEM and/or EPA staff upon request. At the time of the inspection, this data was combined with the collection system maintenance note on an iPhone and there was only documentation for one singular check conducted, despite a review of the National Weather Service Reporting station data showing that eleven occurrences of 0.25 inches of rain or greater have occurred since the previous inspection. The town has been cited for this violation on numerous consecutive inspection reports, and the most recent town response assured IDEM that this violation was resolved and that every instance of investigation would be documented moving forward, but the violation continues to persist. All SSO overflow checks and collection system maintenance checks and task completions must be documented in writing and those documents must be made available for review moving forward and any missing information from this point on will be considered an immediate violation and subject the town to further enforcement actions.

Facility/Site:

Comments:

Facility/Site was rated unsatisfactory due to the effluent flow control gate allowing flow to pass through even though it is closed. Part II. B. 1. b. of the permit requires that the facility be operated in a manner which will minimize discharges of excessive pollutants. Currently, an undetermined amount of flow is leaving the pond and discharging without receiving proper disinfection and without the required sampling occurring. The town must investigate the cause of flow being discharged when the pond valves are supposed to be closed off and should take steps to either stop the flow from being discharged out the outfall or sample and report it as required by permit.

Sludge Disposal:

Comments:

The town profiles the sludge depth in the lagoons on a regular basis and has added chemical to help break down sludge that has accumulated in the first cell of the lagoon.

Flow Measurement:

Comments:

The effluent flow meter was last calibrated in September 2023. Despite being within the calibration window, flow could easily be heard leaving the lagoon while the flow meter showed 0.0 GPM (this issue is also in the facility/site section of the inspection report), so there may be an issue with the meters ability to detect low-flow conditions. The town should mention this during the next flow meter calibration if they determine that the flow is in fact passing through the flow meter and not getting around the flume somehow.

Laboratory:

The following laboratory records were reviewed:

Chain-of-Custody	Contract Lab Reports	CBOD Bench Sheets
Ammonia Bench Sheets	TSS Bench Sheets	

S 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 found to be used.
- d. Calibration and maintenance of instruments was found to be adequate.
- e. QA/QC procedures were found to be 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

Franklin WWTP	Franklin, IN
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Comments:

The Laboratory evaluation generated a satisfactory rating. The bench sheets and contract lab reports that were

missing during the previous inspection were all on site and appeared to be complete and accurate. The plant superintendent said he will work to get everything organized and placed into the properly monthly folders before IDEMs next inspection.

Pretreatment:

Comments:

The facility has no industrial sources.

Effluent Limits Compliance:

No 1. Were DMRs reviewed as part of the inspection?

Comments:

IDEM REPRESENTATIVE

Inspector Name:

Jason Palin

Email:

japalin@idem.IN.gov

Phone Number:

317-504-0007

IDEM MANAGER REVIEW

IDEM Manager:

Kim Rohr

Date:

6/28/2024