



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
*Governor*

**Brian C. Rockensuess**  
*Commissioner*

July 2, 2024

Via email: [mayor@goshencity.com](mailto:mayor@goshencity.com)

The Honorable Gina Leichty, Mayor  
City of Goshen  
202 S 5<sup>th</sup> Street, Suite 1  
Goshen, IN 46528

Dear Mayor Leichty:

Re: Inspection Summary/Deficiency Letter  
City of Goshen POTW  
Pretreatment Program Audit  
NPDES Permit No. IN0025755  
Elkhart County

A representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an on-site inspection on June 25 & 26, 2024 of the City of Goshen POTW's Pretreatment Program. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Pretreatment Audit

Results of Inspection/Audit: The city of Goshen POTW has a good pretreatment program, with some deficiencies observed. See attachment A for a description of the deficiencies.

Within 30 days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in Attachment A, must be submitted to this office. The response must:

- A. Discuss the required tasks that have already been completed, and
- B. Include a schedule with a deadline for completing each remaining task as soon as possible.
- C. After finishing each task, the City must report in writing within 15 days. The report must discuss the finished task and verify the completion with supporting documentation.



Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*



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 identified within the enclosed report.

Thank you for your attention to this matter. If you have any questions, please contact Mary Armacost at (317) 234-4816 or [marmacos@idem.in.gov](mailto:marmacos@idem.in.gov). Please direct your response, along with the requested information or reports to [marmacos@idem.in.gov](mailto:marmacos@idem.in.gov).

Sincerely,



Gary Starks,  
Chief Compliance Data Section  
Office of Water Quality

Enclosures

cc: Newton Ellens, USEPA  
Mick Reese, Goshen POTW  
Jim Kerezman, Goshen POTW  
Mary Armacost, IDEM  
Porfirio Ascencio, IDEM

## ATTACHMENT A

Purpose: Pretreatment Program Audit  
Facility: Goshen POTW – NPDES Permit No. IN0025755  
1000 W Wilden Ave  
Goshen, IN  
Elkhart County

Date of Inspection: June 25 & 26, 2024

IDEM Representative: Mary Armacost - Pretreatment Coordinator  
[marmacos@idem.in.gov](mailto:marmacos@idem.in.gov)

Facility Representative: Mick Reese, Environmental Compliance Administrator

On June 25 & 26, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Water Quality conducted a pretreatment program audit of the Goshen POTW's Pretreatment Program. The last audit of the City's program had been performed in 2019. This report describes the findings of the most recent audit.

The City's pretreatment staff has a good pretreatment program with some deficiencies. The staff is knowledgeable, organized, and very helpful. The staff has permitted eight (8) Significant Industrial Users (SIUs). All eight (8) of the SIUs have been classified as a Categorical Industrial User (CIU). The following SIU files were reviewed during the audit:

Gleason Industrial Products Goshen Manufacturing Div 612 Reynolds St Goshen, IN Permit IPP003 SIC 3559,3537 Category 433.17 Metal Finishing	Lippert Components, Inc Plant 86 3325 Hackberry Dr Goshen, IN Permit IPP010 SIC 3471 Category 433.17 Metal Finishing	Dairy Farmers of America 1110 S 9 <sup>th</sup> St Goshen, IN Permit IPP005 SIC 2026,2025 Category 405 Dairy Product Processing
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No inspection of the IUs occurred due to the POTW responding to a slug discharge from Dairy Farmers of America. The IDEM auditor did attend the enforcement meeting between the POTW and the IU.

## **Audit Findings:**

### Control Mechanisms

In accordance with 403.8(f)(1)(iii)(B)(1) Individual Control Mechanisms must be enforceable and contain a statement of duration, in no case more than five years. The permit for Lippert Components P85 is for 5 years and 1 day.

In accordance with 40 CFR 403.8(f)(1)(iii)(B)(4) Permits must contain the location of the sampling location. The permits did contain sampling locations; however, they were not specific enough that someone using the permit to find the location would be able to find it.

In accordance with 40 CFR 403.12(o)(3) The POTW is required to have a provision in the permit to extend the required time frame for record retention. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator. The permits review had this provision for the City of Goshen but did not include an extension requirement requested by IDEM or the US EPA.

### Pretreatment Standards

In accordance 40 CFR 403.5(d) Where specific prohibitions or limits on pollutants or pollutant parameters are developed by a POTW in accordance with paragraph (c) above, such limits shall be deemed Pretreatment Standards for the purposes of section 307(d) of the Act. All permits did not require all of the local limits to be monitored for or given a waiver if not expected to be present.

### Compliance Monitoring

In accordance with 40 CFR 403.8(f)(2)(v) The POTW is required to inspect and sample the effluent from each Significant Industrial User at least once a year. The IUs were not sampled for the local limits if they were not listed in the industrial user's permit.

### Enforcement

In accordance with 40 CFR 403.8(f)(2)(vii) the POTW is required to investigate instances of noncompliance and respond. There were several violations and the city responded to the vast majority of them. However, there were 3 instances where violations were not issued in response to limit exceedances: Zinc violation on 01/09/23 for Gleason Reynolds, no sampling for pH in 07/22/22, and a nickel violation on 09/18/23 for Lippert 85.

Additionally, there were violations for BOD, TSS, and Phosphate that were not issued notice of violations because they were intended to be surcharge only. Surcharge only limits should be listed in a separate table or the comments for the Effluent limits should specifically state that these limits are for surcharge only and are not effluent limits.

## Recommendations

Dairy Farmers of America does fall under 40 CFR 405 Dairy Products Processing, however 405 does not have pretreatment monitoring requirements. It is recommended that it is either mentioned in the permit or the briefing memo that it is Categorical under 40 CFR 405 and include the subcategories.

In the upset conditions it states the IU must notify the POTW if the upset might lead to a violation of categorical pretreatment standards. It is recommended that all upset condition be reported to the POTW.

The section of the permit that requires notification of a violation is not located next to the requirement to resample after a violation. It is recommended that these be put into the same section or be listed one after the other.

**SECTION I: DATA REVIEW**

**INSTRUCTIONS:** Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
- Use N/A (Not Applicable) where appropriate.

**A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]**

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?  If yes, discuss.	<b>Yes</b>	<b>No</b>
		X

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?  If yes, describe. <i>The City is in the process of modifying the ordinance to include a BOD monthly average ceiling limit of 800mg/l; with a daily high of 1600mg/l. The exceedance of these values would possibly be an exceedance fee.(to be Determined)</i>	<b>Yes</b>	<b>No</b>
	X	

c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)?  If yes, describe.	<b>Yes</b>	<b>No</b>
		X

**SECTION I: DATA REVIEW (CONTINUED)**

**A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]**

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

- Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]
- Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]
- Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]
- Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]
- SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]
- Record-keeping requirements for BMPs. [40 CFR 403.12(o)]
- Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]
- Modifications to the sampling requirements. [40 CFR 403.12(g)]
- Requirement to report all monitoring results. [40 CFR 403.12(g)]

	Yes	No
X		
X		
X		
X		
X		
X		
X		
X		

If not, when?

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?

	Yes	No
X		

If yes, check which ones.

X	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
X	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
X	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

**SECTION I: DATA REVIEW (CONTINUED)**

<b>A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]</b>		
2. a. Are there any planned changes to the POTW's treatment plant(s)?  If yes, describe.	<b>Yes</b>	<b>No</b>
		X
b. Are these changes to the treatment plant(s) due to pretreatment issues?  If yes, what were the issues?	<b>Yes</b>	<b>No</b>
		X
<b>B. LEGAL AUTHORITY [403.8(f)(1) ]</b>		
1. a. Are there any contributing jurisdictions discharging wastewater to the POTW? If yes, complete questions b–e.	<b>Yes</b>	<b>No</b>
		X
b. List the contributing jurisdictions.		
c. Does the CA have an agreement in place that addresses pretreatment program responsibilities? <b>NA – No contributing jurisdictions</b>	<b>Yes</b>	<b>No</b>
	X	
d. Is the CA or the contributing jurisdiction responsible for the following: <b>NA</b>		
	<b>CA Responsibility</b>	<b>Contributing Jurisdiction Responsibility</b>
Updating the IWS	X	
Notifying IUs of requirements	X	
Issuance of control mechanisms	X	
Receiving and reviewing IU reports	X	
Conducting inspections	X	
Conducting compliance monitoring	X	
Enforcement of Pretreatment Standards and Requirements	X	



**SECTION I: DATA REVIEW (CONTINUED)**

<b>B. LEGAL AUTHORITY (continued) [403.8(f)(1)] (continued)</b>		
<p>e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions? <b>NA</b></p> <p>If yes, explain.</p>	<b>Yes</b>	<b>No</b>
		X
<p>2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?</p> <p>b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW? <b>NA</b></p> <p>c. Did the CA update its procedures and ERP to implement the changes in its SUO?</p> <p>Explain</p>	<b>Yes</b>	<b>No</b>
	X	
		X
		X
<p>3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?</p> <p>If yes, explain.</p>	<b>Yes</b>	<b>No</b>
		X

## SECTION I: DATA REVIEW (CONTINUED)

### C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?) **Same.**

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU*?

**Has not implemented**

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

**N/A No flow under 100 gallons/day.**

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

**As defined by 403.3(v)(1)(ii) OK ask how they find them. Non residential filles out forms when sign up for service.**

**Review and inspect if necessary. Sand oil seperators on all non residential floor drains.**

Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

**Utility office surveys. Are they sent to all non-domestic? Yes**

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

Evaluating Surveys. Determining status from those surveys.

**SECTION I: DATA REVIEW (CONTINUED)**

**C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)] (continued)**

4. How many IUs are identified by the CA in each of the following groups?

a.	18	SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
	8	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
		Middle-tier CIUs** (specify below)
	0	Noncategorical SIUs <b>DFA 405 &amp; Viewrail 433</b>
b.	0	Other regulated nonsignificant IUs (specify)
		Noncategorical nonsignificant IUs
		NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
		Zero-discharging CIUs** (specify below)
c.	8	TOTAL

**\*\* The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs:

List of Middle-Tier CIUs:

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? \_\_\_\_\_

List of SIUs with general control mechanisms:

**SECTION I: DATA REVIEW (CONTINUED)**

<b>D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]</b>		
<p>1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]</p>	0	%
<p>b. Has the CA implemented any general control mechanisms? <b>NO</b></p>		
<p>c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? List the types of SIUs covered under a general control mechanism: <b>NA</b></p>	NA	
<p>d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]</p> <p>If any, explain.</p>	0	
<p>2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA? <b>ask</b></p>		
<p>b. How are control mechanisms (specifically limits) developed for these facilities? <b>Ask NA</b></p> <p>Discuss</p>		
<p>3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?</p>	<b>Yes</b>	<b>No</b>
<p>b. Is any of the waste hazardous as defined by RCRA?</p>		X
<p>c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?</p>		X
<p>d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)] <b>N/A</b></p>		

**SECTION I: DATA REVIEW (CONTINUED)**

**E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS**

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

N/A

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

State information, Other Plants, Intermunicipal Task force, IWEA

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

a. For what pollutants have local limits been set? Please see attached.

b. How were these pollutants selected? Industrial discharge Measurements, EPA Standards, Local standards, NPDES requirements.

c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits? NPDES Permit Requirements.

d. Which allocation method(s) were used? Quarterly Local limit Testing.

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits?

Daily max/Monthly averages

f. When was the CA's last local limits evaluation? What was the approval date? 2024 Approval pending ordinance change. Tentative approval 04/23/2024 – needs public notice – PASSED 1<sup>ST</sup> READING. Received copy of public notice.

Yes	No
	X

g. Has the CA identified any pollutants of concern beyond those in its local limits?

If yes, how has this been addressed?

**SECTION I: DATA REVIEW (CONTINUED)**

**E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)**

4. What challenges, if any, were encountered during local limits development and/or implementation?

Challenges of Data evaluation and interpretation. (Control Authority representative view) Implementing data into model for evaluation.

**F. COMPLIANCE MONITORING**

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

Once per year metals monitoring. Monthly Monitoring report evaluations, Physical interaction with representatives. Establishment of working relationship between CA representative and industry.

b. Is the frequency established above more, less, or the same as required? [More.](#)

Explain any difference. [Requiring an MMR establishes monthly interaction for questions, evaluation of process, and suggestions on more efficient processes.](#)

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

[N/A](#)

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12-month period 2023 to 2024.)

a. Not sampled or not inspected at least once [WENDB – NOIN]

0	%
---	---

b. Not sampled at least once [RIDE – SIUs Not Sampled]

0	%
---	---

c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]

0	%
---	---

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

**SECTION I: DATA REVIEW (CONTINUED)**

**F. COMPLIANCE MONITORING (continued)**

3. a. Indicate the number and percent of SIUs that were identified as being in SNC\* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]

SNC Evaluation Period none

	%	Applicable Pretreatment Standards and reporting requirements
	%	Self-monitoring requirements
	%	Pretreatment compliance schedule(s)

\*SNC defined by:

<b>POTW</b>	
<b>EPA</b>	<b>X</b>

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs. None

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: \_2020-Present\_\_\_\_\_

Number of SIUs: \_1\_\_\_\_\_

Names of SIUs:

Dairy Farmers Of America

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)]

Form Attached.

Request a copy of the CA's inspection form, if applicable.

5. Who performs the CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name
<span style="color: blue;">CF Environmental</span>

Conventional Pollutants evaluated in House.

**SECTION I: DATA REVIEW (CONTINUED)**

**F. COMPLIANCE MONITORING (continued)**

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

**Check all that are applicable.**

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	X	Sample Splits	
Chain-of-custody forms	X	Sample Blanks	
New Sampling Tubes		Sample Spikes	
Field Blanks		Other: <a href="#">DMRQA</a>	
Other: <a href="#">DMRQA</a>			

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

[NONE](#)

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA?

Yes	No
	X

[403.12(j)&(p)]

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?

[Inspections.](#)

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

List SIUs required to have a slug discharge control plan: [All SIUs](#)

[Dairy Farmers of America, Gleason Monroe, Gleason Reynolds, Shiloh, Viewrail, Lippert 45, Lippert 85, Bearcat.](#)

Yes	No
X	

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

If not, which SIUs have not been evaluated?



**SECTION I: DATA REVIEW (CONTINUED)**

**G. ENFORCEMENT**

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)] [EPA Definition.](#)

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW? [Yes](#)

b. Has the ERP been approved by the Approval Authority? [Ask – 2019 audit say 10/28/2010 ACCURATE](#)

c. Does the ERP describe how the CA will investigate instances of noncompliance? [Yes](#)

d. Does the ERP describe types of escalating enforcement responses and the time frames for each response? [Yes](#)

e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response?

[The enforcement response is carried out by the City Legal Dept.](#)

f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements?

[Yes](#)

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

[Yes. The BOW \(Board of Works\) meets weekly and therefore is able to discuss matters in a narrow timeframe.](#)

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.

Yes	No
X	
X	

[As of this evaluation, there are no industries on compliance schedules. On the MMR \(Monthly Monitoring Report\), There is a violation page that is filled out that contains time limits.\(Attached\)](#)

**SECTION I: DATA REVIEW (CONTINUED)**

<b>G. ENFORCEMENT (continued)</b>							
<p>4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]</p> <p>If yes, attach a copy. <a href="#">No significant Noncompliance issues.</a></p> <p>If no, explain.</p>	<b>Yes</b>		<b>No</b>				
	X						
<p>5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?</p> <p>b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?</p>				None			
<p>6. a. Did the CA experience any of the following caused by industrial discharges?</p>							
	<b>Yes</b>	<b>No</b>	<b>Unknown</b>	<b>Explain</b>			
• Interference		X					
• Pass through		X					
• Fire or explosions (flashpoint, and such)		X					
• Corrosive structural damage		X					
• Flow obstruction		X					
• Excessive flow rates		X					
• Excessive pollutant concentrations		X					
• Heat problems		X					
• Interference due to oil and grease (O&G)		X					
• Toxic fumes		X					
• Illicit dumping of hauled wastes		X					
• Worker health and safety		X					
• Other (specify)							

**SECTION I: DATA REVIEW (CONTINUED)**

**G. ENFORCEMENT (continued)**

b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]

N/A

Yes	No

7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA?

Yes	No
X	

b. If yes, how many were due to nondomestic waste issues (O&G blockages)? No, SSO was residential.

**H. DATA MANAGEMENT/PUBLIC PARTICIPATION**

1. How is confidential information handled by the CA? [403.14] Information/Pictures from inspections etc. are all stored on a private server. Ask if confidential is asked for – CALL LAWYER FOR ADVISE

2. How are requests by the public to review files handled? They are evaluated by the POTW. If denied by the POTW, it then goes to legal and the Board of Works. (same chain as the ERP)

**SECTION I: DATA REVIEW (CONTINUED)**

**H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)**

3. Does the CA accept electronic reporting? If no, does it plan to do so? **No. The City would adopt this if it was economically feasible. See shared crommer – send the data for shared crommer - done**

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

**Data management is efficient in that all data is recorded through the MMR. Surcharge billing, Violation page, and individual monthly reports are all included.**

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

**Counsel Approval is required. Therefore, this is open to public review. (2 readings)**

6. Explain any public or community issues affecting the CA's pretreatment program.

**DFA-Issues with filling a tanker with Calamity tank waste. If BOD too high no discharge goes to calamity tank.**

7. How long are records maintained? [403.12(o)] **3+ years**

**SECTION I: DATA REVIEW (CONTINUED)**

<b>I. RESOURCES [403.8(f)(3)]</b>			
1. Estimate the number of personnel (in FTEs) available for implementing the program.			
1			
2019 had a lot more people, is 1 sufficient? Per POTW yes 1 is sufficient			
Activity	FTEs	Activity	FTEs
Legal Assistance		Sample Analysis	
Permitting		Data Analysis: Review and Response	
Inspections		Enforcement	
Sample Collection		Administration	
Total Number of FTEs			1
2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)		<b>Yes</b>	<b>No</b>
If not, explain.		X	
3. a. Estimate the annual operating budget for the CA's program.			\$ 24,920
This is less than 2019 (\$35K) why? Less staff			
b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)?			
same			
Discuss any changes in funding.			
4. Discuss any problems in program implementation that appear to be related to inadequate resources. <span style="color: blue;">No major issues.</span>			

**SECTION I: DATA REVIEW (CONTINUED)**

**I. RESOURCES (continued) [403.8(f)(3)] (continued)**

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

Training through IWEA, the administrative authority, EPA Workshops.

Yes	No
X	

b. Does the CA have adequate reference material to implement its program?

**J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION**

1. a. How many times was the POTW monitored in the past year?

- Metals
- Priority pollutants
- Biomonitoring
- Toxicity Characteristic Leachate Procedure (TCLP)
- Extraction Procedure (EP) toxicity
- Other (specify) [Hg Low Level](#)

Influent	Effluent	Sludge	Ambient (Receiving Water)
52	52	12019 was Q, is A	
1	1	1	
	2		
6	6		

Less	Equal	More
		X

b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Explain any differences. Metals are a monitoring basis. [The plant conducts metals analysis weekly as a precursor to "head off potential pollutants."](#)

**SECTION I: DATA REVIEW (CONTINUED)**

**J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)**

c. Is the CA reporting these results to the Approval Authority?

Yes	No
X	

If yes, at what frequency? [All testing that is conducted is reported to the Approval Authority.](#)

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality?
- Sludge disposal options?

Yes	No
X	
X	
X	
X	
X	
X	

b. Has the CA documented these findings?

X	
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Explain. (Attach a copy of the documentation, if appropriate.) [Studies for loading were calculated for upgrades. Historical Data is kept on file for 3+ Years](#)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?) [Recent trend of BOD decreases have been noticed. The main SIU \(Dairy Farmers of America\) has had a decrease in Effluent BOD. This is being seen directly at the plant.](#)

Discuss on a pollutant-by-pollutant basis. [See above.](#)

**SECTION I: DATA REVIEW (CONTINUED)**

<b>J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)</b>		
4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?	<b>Yes</b>	<b>No</b>
	X	
If yes, what was found? <a href="#">Results from MMR data was evaluated, from DFA to find the decreasing trend.</a>		
5. a. Has the CA implemented any kind of public education program?	<b>Yes</b>	<b>No</b>
	X	
b. Are there any plans to initiate such a program to educate users about pollution prevention?	<b>Yes</b>	<b>No</b>
	X	
Explain. <a href="#">Talks with public groups such as home owners associations, school tours etc.</a>		
6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)? <a href="#">Grease program has been developed. It seems to be effective.</a>		
7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?	<b>Yes</b>	<b>No</b>
	X	
Explain. <a href="#">DFA Results.</a>		



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**SECTION I: DATA REVIEW (CONTINUED)**

**K. ADDITIONAL EVALUATIONS/INFORMATION**

Strengths of program: MMR spreadsheet puts all the reporting tools at the SIU's fingertips.

Industry fills out report every month and submits the electronic copy of MMR and mails copy of original or arranges for a pickup from the CA. Reports are due on the 20<sup>th</sup> of the following month. Violations appear in red.

All 12 months are included within the spread sheet.

Other Sheets calculate surcharge for conventional pollutants.

Sheet is provided for violations.

Reviewed by Mary Armacost – IDEM Pretreatment Coordinator

SECTION I COMPLETED

BY:

Micky Reese

TITLE: Env. Comp. Admin.

DATE: 5/15/2024

E-MAIL: mickreese@gosh  
encity.com

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## SECTION II: IU FILE EVALUATION

**INSTRUCTIONS:** Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or PCA should be evaluated. Make copies of this section to review additional files as necessary.

### IU IDENTIFICATION

FILE <b>GR</b> Industry name and address Gleason Industrial Products      Permit IPP003 Goshen Manufacturing Div      Eff 03/01/2020 612 Reynolds St      Exp 02/28/2025 Goshen, IN 46526	Type of industry <b>Manufactures 2 wheel carts</b> Welding, tube bending, and powder coating. Process effluent from powder coat line wash/rinse facility  SIC Code: 3559 & 3537 NAICS Code:	
<input type="checkbox"/> CIU 40 CFR 433.17 Ask year started, reg 1983 – before 1983, c 1950's Category(ies) <b>Metal Finishing New Source</b>	Average total flow (gpd)	Average process flow <b>14 K</b>
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments Reviewed 2023 data		
FILE <b>DF</b> Industry name and address Dairy Farmers of America      Permit IPP005 1110 S 9 <sup>th</sup> St      Eff 2/1/2020 Goshen, IN 46526      Exp 1/31/2005	Type of industry <b>Dairy</b> Ask should be 405 but no limits put in fact sheet  SIC Code: 2026, 2025 NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____  Category(ies) _____	Average total flow (gpd) <b>Ask</b>	Average process flow 0.221 MG Month 2.6 MG Ann
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments Expiration date should be 2025 – was fixed Why not 405 Dairy Products Processing is but no limits for PT Reviewed 2022 data Started 1930's		

**SECTION II: IU FILE EVALUATION (CONTINUED)**

<b>IU IDENTIFICATION (continued)</b>		
FILE LC_ Industry name and address Lippert Components, Inc. Plant 85 Permit IPP010 3325 Hackberry Dr Eff 09/10/2020 Goshen, IN 46526 Exp 9/10/2025	Type of industry Anodizing of aluminum extrusion & Die cast fabrication. Coatings SIC Code:3471 NAICS Code:	
<input type="checkbox"/> CIU 40 CFR 433.17 Ask year started, reg 1983 – 1990's Category(ies) Metal Finishing New Source	Average total flow (gpd)	Average process flow 1500 gpd
	<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	
Industry visited during audit    Yes <input type="checkbox"/> No <input type="checkbox"/>		
Comments Permit is 5 years and 1 day. Needs to expire 9/9/2025 20 gpm PT system Started in 1990's		
FILE _____ Industry name and address	Type of industry  SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____  Category(ies) _____	Average total flow (gpd)	Average process flow
	<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	
Industry visited during audit    Yes <input type="checkbox"/> No <input type="checkbox"/>		
Comments		

**SECTION II: IU FILE EVALUATION (CONTINUED)**

<b>IU IDENTIFICATION (continued)</b>		
FILE _____ Industry name and address	Type of industry  SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____  Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit    Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		
General Comments		

**SECTION II: IU EVALUATION (CONTINUED)**

Industry Name					<p><b>INSTRUCTIONS:</b> Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.</p>	Reg. Cite
File	File	File	File	File		
<u>GR</u>	<u>DF</u>	<u>LC</u>	___	___	<b>IU FILE REVIEW</b>	
					<b>A. ISSUANCE OF IU CONTROL MECHANISM</b>	
x	x	x			1. Control mechanism application form	
X	2	X			2. Fact sheet	
X	X	X			3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
X	X	X			a. Individual control mechanism	
NA	NA	NA			b. General control mechanism	403.8(f)(1)(iii)(A)
X	X	X			4. Control mechanism contents	403.8(f)(1)(iii)(B)
X	3	X <sup>4</sup>			a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
X	X	X			b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
1	1	1			c. Applicable effluent limits (local limits, categorical standards, BMPs)	403.8(f)(1)(iii)(B)(3)
<p><b>Comments</b></p> <p>1 Not all local limits in permit – missing Chromium Hex, Mercury, PCB (are part of TTOs so are monitored – should be listed), phenols, selenium. DF – none of the local limits in permit, LC missing Arsenic, Hex Chromium, Mercury, PCBs, Phenols, &amp; Selenium</p> <p>2 Briefing Memo should list what the facility does and why it is permitted.</p> <p>3 States that it is 5 years but expiration date is a typo, should be 2025 (2005) – Already fixed</p> <p>4 States that it is 5 years, but is 5 years and 1 day</p>						

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>A. ISSUANCE OF IU CONTROL MECHANISM (continued)</b>	
X	X	X			d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
X	X	X			• Identification of pollutants to be monitored	
1	NA	1			• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
X	NA	NA			• Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
2	NA	2			• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
X	X	X			• Sampling frequency	
NA	NA	NA			- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
3	3/5	3			• Sampling locations/discharge points	
X	X	X			• Sample types (grab or composite)	
X	X	X			• Reporting requirements (including all monitoring results)	
4	4	4			• Record-keeping requirements	
<p>Comments</p> <p>1 method for seeking a TOMP</p> <p>2 need to add re-instate language in both Special Conditions G and Additional/Special Monitoring Requirements 2.</p> <p>3 Need to add exactly where outfall 001 is located in Special Conditions A</p> <p>4 Need to add to Retention of Records 4a and Monitoring and Reporting A6 that IDEM and EPA can also extended</p> <p>5 Is the sample point diluted with other flow in the collection system – see Figure 1 drawn wrong</p>						

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>A. ISSUANCE OF IU CONTROL MECHANISM (continued)</b>	
X	X	X			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
X	X	X			f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
1	1	1			g. Notice of slug loadings	403.12(f)
X	X	X			h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
X	X	X			i. Notification of significant change in discharge	403.12(j)
1	1	1			j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
X	X	X			k. 24-hour notification of violation/resample requirement	403.12(g)(2)
X	X	X			l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)

Comments

1 Slug Control Plan recommend define immediately and add area code to phone number – also in Management Requirements 1 (3<sup>rd</sup> paragraph) LC emergency phone number to many digits Immedately also in Change in Discharge

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>A. ISSUANCE OF IU CONTROL MECHANISM (continued)</b>	
NA	NA	NA			5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
NA	NA	NA			a. Involve the same or similar operations	
NA	NA	NA			b. Discharge the same types of wastes	
NA	NA	NA			c. Require the same effluent limitations	
NA	NA	NA			d. Written request by the IU for coverage by a general control mechanism including:	
NA	NA	NA			• Contact information	
NA	NA	NA			• Production processes	
NA	NA	NA			• Types of waste generated	
NA	NA	NA			• Location for monitoring all wastes covered by the general permit	
NA	NA	NA			• Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
NA	NA	NA			e. Documentation to support the POTW's determination	

Comments



**SECTION II: IU EVALUATION (CONTINUED)**

File GR	File DF	File LC	File ___	File ___	IU FILE REVIEW	Reg. Cite
<b>B. CA APPLICATION OF IU PRETREATMENT STANDARDS</b>						
X	2	X			1. IU categorization	403.8(f)(1)(ii)
X	NA	X			2. Calculation and application of categorical standards	403.8(f)(1)(ii)
X	NA	X			a. Classification by category/subcategory	
x	NA	x			b. Classification as new/existing source	
1	3	4			c. Application of limits for all regulated pollutants	
NA	NA	NA			d. Classification as an NSCIU	403.3(v)(2)
NA	NA	NA			e. Documentation for the qualification to be classified as NSCIU	
NA	NA	NA			f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
1	3	4			3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
NA	NA	NA			4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
NA	NA	NA			5. Calculation and application of production-based standards	403.6(c)

**Comments**

1. Missing some local limits – ok if POTW samples. GR – Hex Chromium, Mercury, PCBs, Phenols, Selenium
2. Why not 40 CFR 405 Dairy Products Processing – Most 403 requirement – recommend put in briefing memo
3. Missing all the local limits
4. Missing LL Arsenic, Hex Chromium, Mercury, PCBs, Phenols, Selenium. pH different from prohibited discharge (also in the permit) 5.5-10 v. 6-9 – statement in either notes or briefing memo

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)</b>	
NA	NA	NA			6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
NA	NA	NA			a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
NA	NA	NA			b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
NA	NA	NA			c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
NA	NA	NA			d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
NA	NA	NA			e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
NA	NA	NA			f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
NA	NA	NA			g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
NA	NA	NA			h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
NA	NA	NA			7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
NA	NA	NA			a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
NA	NA	NA			b. Documentation that dilution is not being used as treatment? (Y/N)	
NA	NA	NA			8. Calculation and application of CWF or FWA	403.6(d)&(e)
1	1	1			9. Application of most stringent limit	403.8(f)(1)(ii)

Comments

1 Not all Local Limits in the permit.

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>C. CA COMPLIANCE MONITORING</b>	
X	X	X			1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
<u>NA</u>	<u>NA</u>	<u>NA</u>			a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
<u>NA</u>	<u>NA</u>	<u>NA</u>			• Evaluation of discharger with the definition of NSCIU once per year	
<u>NA</u>	<u>NA</u>	<u>NA</u>			b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
<u>NA</u>	<u>NA</u>	<u>NA</u>			• Inspect at least once every 2 years	
X	X	X			2. Inspection at frequency specified in approved program	403.8(c)
X	X	X			3. Documentation of inspection activities	403.8(f)(2)(v)
X	X	X			4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
1	2	3			5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
<u>NA</u>	<u>NA</u>	<u>NA</u>			a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
<u>NA</u>	<u>NA</u>	<u>NA</u>			• Sample waived pollutant(s) at least once during the term of the control mechanism	
<u>NA</u>	<u>NA</u>	<u>NA</u>			b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
<u>NA</u>	<u>NA</u>	<u>NA</u>			• Sample and analyze IU discharge at least once every 2 years	
X	2	3			6. Sampling at the frequency specified in approved program	403.8(c)
X	X	X			7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
1	2	3			8. Analysis for all regulated parameters	403.12(g)(1)
X	X	X			9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)

**Comments**

1 Did not sample for Chromium-Hex or Mercury from LL

2 Did not sample for Chromium-Hex, Cyanide, Mercury, TTO (+PCBs, Phenol) – Local limits are not sampled annually

3 Did not sample for Chromium-Hex, Cyanide, Mercury, PCBs, Phenol

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>D. CA ENFORCEMENT ACTIVITIES</b>	
1.	2	4			1. Identification of violations	403.8(f)(2)(vii)
1	X	X			a. Discharge violations	
1	3	4			• IU self-monitoring	
NA	NA	NA			• CA compliance monitoring	
NA	NA	NA			b. Monitoring/reporting violations	
NA	NA	NA			• IU self-monitoring	
NA	NA	NA			– Reporting (e.g., frequency, content)	
NA	NA	NA			– Sampling (e.g., frequency, pollutants)	
NA	NA	NA			– Record-keeping	
NA	NA	NA			• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
NA	NA	NA			• Slug discharge control plan	
NA	NA	NA			• Compliance schedule/reports	
NA	NA	NA			c. Compliance schedule violations	
NA	NA	NA			• Start-up/final compliance	
NA	NA	NA			• Interim dates	
<p>Comments</p> <p>1 Zinc violation 1/9/23 1.66 to limit 1.48 MO – No NOV, Phosphates are in the limit table but meant to be surcharge – no NOV, must be in a separate table or commented that it is not a hard limit.</p> <p>2. Limits are listed as effluent limits for BOD, TSS, Phosphate but they are supposed to be surcharges. No NOVs given, needs to be a separate table.</p> <p>3. pH 7/22 not sampled – no NOV issues. Did have others that were issued NOVs</p> <p>4 Nickle Violation 50, limit 1.4 on 9/18/2023. No NOV issued</p>						

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>D. CA ENFORCEMENT ACTIVITIES (continued)</b>	
NA	NA	NA			2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
NA	NA	NA			a. Chronic	
NA	NA	NA			b. TRC (Technical Review Criteria)	
NA	NA	NA			c. Pass through/interference	
NA	NA	NA			d. Spill/slug reporting load	
NA	NA	NA			e. Reporting	
NA	NA	NA			f. Compliance schedule	
NA	NA	NA			g. Other violations (e.g., BMPs requirements)	
X	X	X			3. Response to violation	
X	X	X			4. Adherence to approved ERP	403.8(f)(5)
X	X	X			5. Return to compliance	
X	X	X			a. Within 90 days	
NA	NA	NA			b. Within time specified	
NA	NA	NA			c. Through compliance schedule	
NA	NA	NA			6. Escalation of enforcement	403.8(f)(5)(ii)
NA	NA	NA			7. Publication for SNC	403.8(f)(2)(viii)
Comments						

**SECTION II: IU EVALUATION (CONTINUED)**

File <u>GR</u>	File <u>DF</u>	File <u>LC</u>	File <u>   </u>	File <u>   </u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>E. IU COMPLIANCE STATUS</b>	
X	X	X			1. Self-monitoring and reporting	
X	1	X			a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
X	X	X			b. Analysis of all required pollutants	403.12(g)(1)&(h)
X	X	X			c. Appropriate analytical methods (40 CFR Part 136)	
X	X	X			d. Appropriate sample collection methods	
X	X	X			e. Compliance with sample collection holding times	
NA	NA	NA			f. Submission of BMR/90-day report	403.12(b) &(d)
X	X	X			g. Periodic self monitoring reports	403.12(e)&(h)
X	1	X			h. Reporting all required pollutants	403.12(g)(1)&(h)
X	X	X			i. Signatory/certification of reports	403.12(l)
NA	NA	NA			j. Annual certification by NSCIUs	403.12(q)
NA	NA	NA			k. Submission of compliance schedule reports by required dates	403.12(c)
X	X	X			l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
X	X	X			• Discharge violation	
NA	X	NA			• Slug load	
NA	X	NA			• Accidental spill	
NA	X	2			m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
NA	NA	NA			n. Notification of hazardous waste discharge	403.12(j)&(p)
X	X	X			o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
NA	NA	NA			p. Notification of significant changes	403.12(j)
<p>Comments</p> <p>1 pH samples missed, all but 1 was issued an NOV</p> <p>2. No NOV issued so no resample</p>						

**SECTION II: IU EVALUATION (CONTINUED)**

File <a href="#">GR</a>	File <a href="#">DF</a>	File <a href="#">LC</a>	File <a href="#">___</a>	File <a href="#">___</a>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>E. IU COMPLIANCE STATUS (continued)</b>	
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			2. Compliance with all general control mechanism requirements	
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			<ul style="list-style-type: none"> <li>Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller)</li> </ul>	
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			<ul style="list-style-type: none"> <li>Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW</li> </ul>	
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			<ul style="list-style-type: none"> <li>Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant</li> </ul>	
<a href="#">1</a>	<a href="#">1</a>	<a href="#">1</a>			4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			<ul style="list-style-type: none"> <li>Certification statements with each compliance report</li> </ul>	
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			5. Compliance with BMR requirements, if applicable (Y/N)	
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			<ul style="list-style-type: none"> <li>IU discharges less than 100 gpd of total categorical wastewater</li> </ul>	
<a href="#">NA</a>	<a href="#">NA</a>	<a href="#">NA</a>			<ul style="list-style-type: none"> <li>Annual certification statements from the IU</li> </ul>	

Comments

- Can do waiver for missing LL in permit limits







## PRETREATMENT PROGRAM STATUS UPDATE

<b>INSTRUCTIONS:</b> This attachment is intended to serve as an update of program status. Either the auditor or CA should updated this form before each audit on the basis of information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.			
<b>A. CA INFORMATION</b>			
1. CA name : <b>Goshen WWTP</b>			
2. a. Pretreatment contact <b>Micky Reese</b>		b. Mailing address <b>1000 West Wilden Ave</b> <b>Goshen, IN 46528</b>	
c. Title <b>Environmental Compliance Admin.</b>		d. Telephone number <b>(574)534-4102</b>	
3. Date of last CA report to Approval Authority <b>2024</b>			
4. Is the CA operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?			<b>Yes</b>
			<b>No</b>
			<input checked="" type="checkbox"/>
5. Effluent and sludge quality			
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)			
<b>Parameters Violated</b>		<b>Cause(s)</b>	
<b>e-Coli, Mercury, Phosphorus</b>			
Hg slug – unk source			
Phos – plant issues			
b. Has the treatment plant sludge violated these tests?			<b>Yes</b>
<ul style="list-style-type: none"> <li>• EP toxicity</li> <li>• TCLP</li> </ul>			<b>No</b>
			<input checked="" type="checkbox"/>
6. Does the treatment plant discharge to a 303(d) impaired waterbody? If yes, list the pollutants of concern.			<b>Yes</b>
			<b>No</b>
			<input checked="" type="checkbox"/>
7. Does the treatment plant discharge to a waterbody that has a TMDL that has been developed or is being developed? If yes, include the information on the TMDL (i.e., pollutants of concern, limits, effective date).			<b>Yes</b>
			<b>No</b>
			<input checked="" type="checkbox"/>

## PRETREATMENT PROGRAM STATUS UPDATE

<b>B. PRETREATMENT PROGRAM STATUS</b>			
1. Indicate components that were identified as deficient.			
	<b>Last PCI</b>	<b>Last Audit</b>	<b>Program Report</b>
	<b>Date:</b>	<b>Date: 2019</b>	<b>Date:</b>
a. Program modification			
b. Legal authority			
c. Local limits			
d. IU characterization			
e. Control mechanism			
f. Application of Pretreatment Standards			
g. Compliance monitoring			
h. Enforcement program			
i. Data management			
j. Program resources			
k. Other (specify)			
2. Is the CA presently in RNC for any of these violations?			
a. Failure to enforce against pass through and/or interference [ RNC - I ][ SNC ]	<b>Data Source</b>	<b>Yes</b>	<b>No</b>
b. Failure to submit required reports within 30 days [ RNC - I ][ SNC ]			X
c. Failure to meet compliance schedule milestones within 90 days [ RNC - I ][ SNC ]			X
d. Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months [ RNC - II ]			X
e. Failure to inspect or sample 80% of SIUs within the past 12 months [ RNC - II ]			X
f. Failure to enforce standards and reporting requirements [ RNC - II ]			X
g. Other (specify) [ RNC - II ]			
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)			
<b>Name of SIU in SNC</b>	<b>Compliance Status</b>	<b>Source</b>	
None			
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.			
			SNC Evaluation Period
	%	Applicable Pretreatment Standards and reporting requirements	<b>*SNC defined by:</b>
	%	Self-monitoring requirements	<b>POTW</b>
	%	Pretreatment compliance schedules	<b>EPA</b>

## PRETREATMENT PROGRAM STATUS UPDATE

### B. PRETREATMENT PROGRAM STATUS (continued)

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.

The program has improved to the point that our main SIU will be putting in pretreatment. No industries have been in SNC.

Reviewed by Mary Armacost – IDEM Pretreatment Coordinator

ATTACHMENT A COMPLETED BY: Micky Reese

DATE: 5/16/2024

TITLE: Environmental Compliance Administrator

TELEPHONE: (574)534-4102

## PRETREATMENT PROGRAM PROFILE

**INSTRUCTIONS:** This attachment is intended to serve as a summary of program information. The auditor or CA should obtain the needed information from the original, approved pretreatment program submission and modifications and the NPDES permit. The auditor or CA should update this from, as appropriate, in response to approved modifications and revised NPDES permit requirements.

### A. CA INFORMATION

1. CA name **Goshen WWTP**

2. Original pretreatment program submission date **April 2024 12/28/1984, permit 1/25/1985**

3. Required frequency of reporting to Approval Authority  
**Quarterly/ Annually**

4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
<b>Goshen WWTP</b>	<b>IN0025755</b>	<b>April 15, 2021</b>	<b>2025</b>

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?  
If yes, provide the following information.

Yes	No
	<b>X</b>

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants

### B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? **1985**

2. Identify any substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]

Date Approved	Name of Modification	Date Incorporated in NPDES Permit
<b>2024</b>	<b>Revised Local Limits</b>	

## PRETREATMENT PROGRAM PROFILE (Continued)

<b>C. TREATMENT PLANT INFORMATION</b>			
<b>INSTRUCTIONS:</b> Complete this section for each treatment plant operated under an NPDES permit issued to the CA.			
1. Treatment plant name Goshen WWTP		2. Location address 1000 West Wilden Ave. Goshen, IN 46528	
3. a. NPDES permit number IN0025755	b. Expiration date 2025	4. Treatment plant wastewater flows Design <input style="width: 50px;" type="text" value="5.0"/> mgd      Actual <input style="width: 50px;" type="text" value="3.5"/> mgd	
5. Sewer System	a. Separate <input style="width: 50px;" type="text" value="60"/> %	b. Combined <input style="width: 50px;" type="text" value="40"/> %	c. Number of CSOs <input style="width: 50px;" type="text" value="1"/>
6. a. Industrial contribution (mgd) <input style="width: 100px;" type="text" value=".4"/>	b. Number of SIUs discharging to plant <input style="width: 100px;" type="text" value="8"/>	c. Percent industrial flow to plant <input style="width: 100px;" type="text" value="7%"/>	
7. Level of treatment	<b>Type of Process(es)</b>		
a. Primary	<input style="width: 50px;" type="text" value="20%"/>	Bar screen, Grit Removal, Primary Clarification	
b. Secondary	<input style="width: 50px;" type="text" value="70%"/>	Extended Air, Secondary Clarification	
c. Tertiary	<input style="width: 50px;" type="text" value="10%"/>	Tertiary Clarification, Chlorination, Dechlorination	
8. Indicate methods of sludge disposal.			
Quantity of sludge		Quantity of sludge	
a. Land application	<input style="width: 80px;" type="text"/>	dry tons/year	e. Public distribution
b. Incineration	<input style="width: 80px;" type="text"/>	dry tons/year	f. Lagoon storage
c. Monofill	<input style="width: 80px;" type="text"/>	dry tons/year	g. Other (specify)
d. MSW landfill	<input style="width: 80px;" type="text" value="917.27"/>	dry tons/year	<input style="width: 80px;" type="text"/>
<b>D. APPLICATION OF STANDARDS</b>			
If there is more than one treatment plant, were local limits established specifically for each plant?		N/A	Yes
		X	

## PRETREATMENT PROGRAM PROFILE (Continued)

### E. ADDITIONAL INFORMATION

Reviewed by Mary Armacost – IDEM Pretreatment Coordinator

ATTACHMENT B COMPLETED BY: Micky Reese

TITLE: Environmental Compliance Administrator

DATE: 5/16/2024

TELEPHONE: (574)534-4102

## WENDB DATA ENTRY WORKSHEET

<b>WENDB DATA ENTRY WORKSHEET</b>			
<b>INSTRUCTIONS:</b> Enter the data provided by the specific checklist questions that are referenced.			
CA name <a href="#">City of Goshen POTW</a>			
NPDES number <a href="#">IN0025755</a>			
Date of inspection <a href="#">June 25 &amp; 26, 2024</a>		Date entered into PCS	
<ul style="list-style-type: none"> <li>• Number of SIUs*                             <ul style="list-style-type: none"> <li>- Number of SIUs without control mechanism</li> <li>- Number of SIUs not inspected or sampled</li> <li>- Number of SIUs in SNC** with standards or reporting</li> <li>- Number of SIUs in SNC with self-monitoring</li> <li>- Number of SIUs in SNC with self-monitoring and not inspected or sampled</li> </ul> </li> <li>• Number of CIUs</li> </ul>	<b>PCS Code</b>	<b>Checklist Reference</b>	<b>Data</b>
	SIUS	I.B.2.a	8
	NOCM	I.C.1.b	0
	NOIN	I.E.2	0
	PSNC	I.F.3.a	0
	MSNC	I.F.3.a	0
	SNIN	I.G.5	0
	CIUS	I.B.2.a	8
*The number of SIUs entered into PCS is based on the CA's definition of <i>Significant Industrial User</i> .			
**As defined in EPA's 1986 <i>Pretreatment Compliance Monitoring and Enforcement Guidance</i> .			

WENDB DATA ENTRY WORKSHEET	DATE: <a href="#">06/28/2024</a>
COMPLETED BY: <a href="#">Mary Armacost</a>	EMAL: <a href="mailto:marmacos@idem.in.gov">marmacos@idem.in.gov</a>
TITLE: <a href="#">IDEM Pretreatment Coordinator</a>	



## PCA REQUIRED ICIS DATA ELEMENTS WORKSHEET

▶ TYPE OF COMPLIANCE MONITORING: <b>PCA</b>	
▶ NAME OF PRETREATMENT PROGRAM: <b>City of Goshen POTW</b>	
▶ CONTROLLING AUTHORITY NPDES ID: <b>IN0025755</b>	
START DATE OF INSPECTION ..... <b>06/25/2024</b>	▶ END DATE OF INSPECTION ..... <b>06/26/2024</b>
LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]): <b>Mary Armacost, IDEM, marmacos@idem.in.gov</b>	
ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]): <b>None</b>	

SIGNIFICANT INDUSTRIAL USERS (SIUs)	PCI CHECKLIST REFERENCE	PCA CHECKLIST REFERENCE	DATA
▶ SIUs*:	II.B.2.a	I.C.4.a	<b>8</b>
▶ SIUs Without Control Mechanism:	II.C.1.c	I.D.1 and II.A	<b>0</b>
▶ SIUs Not Inspected:	II.E.2.c	I.F.2.c	<b>0</b>
▶ SIUs Not Sampled:	II.E.2.b	I.F.2.b	<b>0</b>
▶ SIUs in SNC with Pretreatment Standards** :	II.F.3.a	I.F.3.a	<b>0</b>
▶ SIUs in SNC with Reporting Requirements:	II.F.3.a	I.F.3.a	<b>0</b>
SIUs in SNC with Pretreatment Schedule:		I.F.3.a	<b>0</b>
SIUs in SNC Published in Newspaper:		I.G.4; II.D.7	<b>0</b>
Criminal Suits Filed Against SIUs:	II.F.1		<b>0</b>
<b>CATEGORICAL INDUSTRIAL USERS (CIUs)</b>			
▶ CIUs:		I.C.4.a	<b>8</b>
<b>OTHER INFORMATION</b>			
Pass-Through/Interference Indicator <span style="color: red;">(none, Yes, or No)</span>		I.G.6	<b>NO</b>
<b>DEFICIENCIES</b>			
Control Mechanism Deficiencies <span style="color: red;">(No or Yes)</span>		I.D.1; II.A.4	<b>NO</b>
Inadequacy of Sampling and Inspections <span style="color: red;">(No or Yes)</span>		II.C and Site Visit Sheets	<b>No</b>
Adequacy of Pretreatment Resources <span style="color: red;">(Yes or No)</span>		I.I	<b>Yes</b>
<b>FOOTNOTES:</b>			
▶ denotes required information			
* The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."			
** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.			

DATA ENTRY WORKSHEET COMPLETED BY: <b>Mary Armacost</b>	DATE: <b>06/28/2024</b>
TITLE: <b>IDEM Pretreatment Coordinator</b>	EMail.: <b>marmacos@idem.in.gov</b>

## RNC WORKSHEET

<b>RNC WORKSHEET</b>		
<b>INSTRUCTIONS:</b> Place a check in the appropriate box to the left, if the CA is found to be in RNC or SNC.		
CA name <span style="color: blue;">City of Goshen POTW</span>		
NPDES number <span style="color: blue;">IN0025755</span>		
Date of audit <span style="color: blue;">June 25 &amp; 26, 2024</span>		
		Level
<input type="checkbox"/>	Failure to enforce against pass through and/or interference	I
<input type="checkbox"/>	Failure to submit required reports within 30 days	I
<input type="checkbox"/>	Failure to meet compliance schedule milestone date within 90 days	I
<input type="checkbox"/>	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
<input type="checkbox"/>	Failure to inspect or sample 80% of SIUs within the past 12 months	II
<input type="checkbox"/>	Failure to enforce Pretreatment Standards and reporting requirements (more than 15% of SIUs in SNC)	II
<input type="checkbox"/>	Other (specify)	II
<b>SNC</b>		
<input type="checkbox"/>	CA in SNC for violation of any Level I criterion	
<input type="checkbox"/>	CA in SNC for violation of two or more Level II criterion	
<p>For more information on RNC, see EPA's 1990 <i>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</i></p>		

RNC WORKSHEET COMPLETED BY: <span style="color: blue;">Mary Armacost</span> TITLE: <span style="color: blue;">IDEM Pretreatment Coordinator</span>	DATE: <span style="color: blue;">07/28/2024</span> EMAIL: <span style="color: blue;">marmacos@idem.in.gov</span>
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