



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

May 10, 2024

VIA ELECTRONIC MAIL

The Honorable Judy Sheets, Mayor
City of Frankfort
301 E. Clinton Street
Frankfort, Indiana 46041

Dear Mayor Sheets:

Re: Combined Sewer Overflow Program
Long Term Control Plan
Level of Control Review
City of Frankfort
NPDES Permit No. IN0022934
Clinton County

The City of Frankfort has completed all projects included in their approved Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) implementation schedule. Therefore, the Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) has conducted a review of data included on Wastewater Treatment Plant (WWTP) Discharge Monitoring Report (DMR) forms, Wet Weather Treatment Facility (WWTF) Monthly Monitoring Report (MMR) forms, and other relevant information to determine whether CSO discharges comply with the approved LTCP level of control which is to comply with IDEM's Nonrule Policy Document (NPD) Water-016. Flows associated with up to and including the 1-year, 1-hour design storm shall receive full treatment through the WWTP, and flows associated with greater than the 1-year, 1-hour design storm shall receive a minimum of primary treatment and disinfection prior to discharge from Outfall 002. Frankfort has no remaining untreated CSO outfalls. The timeframe included in our review was from March 2019 through January 2024.

The City of Frankfort has one partially treated CSO (Outfall 002) with no untreated CSO outfalls. During the review period, the WWTF MMR forms indicate discharges occurred from outfall 002 during the following 15 months: April 2019, May 2019, June 2019, January 2020, March 2020, May 2020, February 2021, March 2021, May 2021, July 2021, October 2021, November 2021, February 2022, March 2022, and March 2023. The following issues were discovered on the MMR forms:

- *E. coli* violations from the WWTF were identified in May 2019 and May 2021. Antecedent moisture conditions were present at the times of effluent violations. The comment page of the MMR indicated that the WWTP was operating beyond design conditions in May 2019, however, WWTP peak hourly flow data was



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missing for the entire month of May 2019. Frankfort submitted the wrong form during May 2021 (CSO MRO instead of the MMR), and the WWTP peak hourly flow was either missing or incorrectly identified during May 2021. Frankfort must provide additional details as to the cause of WWTF violations during May 2019 and May 2021.

- The CSO DMR form was incorrectly submitted from August 2020 through June 2021. The MMR form was submitted beginning in July 2021. Frankfort must confirm their understanding that the MMR is the appropriate form to be submitted (along with the WWTP DMR) for discharges from Outfall 002.
- It is unclear how Frankfort is identifying the WWTP peak hourly flow on the MMR. For most months during the review period the WWTP peak hourly flow is identified as a decimal, and the value on the MMR is very low. The WWTP peak hourly flow value should be larger than the WWTP average daily flow value. Please explain why a decimal format is used to document the WWTP peak hourly flow value and why the data shown on most MMR forms is lower than the WWTP average daily flow value.
- WWTP average daily flow data, WWTP peak hourly flow data, and precipitation data must be included on the MMR form on all days of the month (not just on days where the WWTF was in use). Frankfort must confirm their understanding that such data will be submitted on the MMR moving forward.

Due to the issues identified above, IDEM is unable to determine whether Frankfort met the approved level of control associated with their LTCP during the monitoring timeframe referenced above. At this time, IDEM requests that Frankfort provide a written response addressing the issues outlined above. The correspondence shall be submitted within forty-five (45) days of the date of this letter.

Please contact Dave Tennis at 317/234-9558 or by email at dtennis@idem.in.gov if you have questions regarding this letter. Thank you for your attention to this matter.

Sincerely,



Leigh Voss, Chief
Municipal NPDES Permits Section
Office of Water Quality

cc: Patrick J. Whitaker, City of Frankfort
Aaron Deeter, IDEM Wastewater Inspector