



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

March 1, 2024

VIA ELECTRONIC MAIL

The Honorable Steve Loehr, Mayor
City of Mount Vernon
520 Main Street
Mount Vernon, Indiana 47620

Dear Mayor Loehr:

Re: Combined Sewer Overflow Program
Long Term Control Plan
Level of Control Review
City of Mount Vernon
NPDES Permit No. IN0035696
Posey County

The City of Mount Vernon has completed all projects included in their approved Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) implementation schedule. The Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) has conducted a review of data included on CSO Monthly Report of Operation (MRO) forms to determine compliance with the approved LTCP level of control, which is no untreated CSO discharge below the ten-year, one-hour design storm, or an equivalent event. The timeframe included in our review was from August 2018 through October 2023.

Five CSO events occurred during the review period. IDEM has determined that four of the CSO events (January 2020, June 2020, July 2020, and October 2020) were due to precipitation which exceeded the design capacity of Mount Vernon's CSO controls. No further information is requested for these events.

The fifth CSO event (March 2022) appears to have occurred due to a precipitation event less than a ten-year, one-hour design storm, or an equivalent event, and the CSO MRO shows that the wastewater treatment plant (WWTP) did not reach the peak hourly flow capacity of 9.2 MGD prior to or during the CSO event. IDEM requests that Mount Vernon submit a written response providing additional clarification regarding this CSO event, including why the WWTP did not reach the peak hourly flow capacity. The correspondence shall be submitted within forty-five (45) days of the date of this letter.

The Honorable Steve Loehr, Mayor
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Please contact Dave Tennis at 317-234-9558 or by email at dtennis@idem.in.gov if you have questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Leigh Voss". The signature is written in a cursive style with a large, stylized "L" and "V".

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

cc: Clarence Carroll, City of Mount Vernon
Jeremy Ferguson, IDEM Wastewater Inspector

Community:	Mount Vernon	Outfalls:
Reviewer:	Dave Tennis	10 yr / 1 hr storm
Date Reviewed:	2/1/2024	10 yr / 15 min storm:
LTCP Fully Implemented Date:	8/2/2013	10 yr / 24 hr storm:
Review Timeframe:	August 2018 - October 2023	Design Peak Hourly Flow:
Number of Months:	63	Design Average Flow:
Level of Control:	Storage for full treatment	

Month/Year	CSO Events	WWTF Events	Dates (Outfall)
August-18	0	N/A	
September-18	0	N/A	
October-18	0	N/A	
November-18	0	N/A	
December-18	0	N/A	
January-19	0	N/A	
February-19	0	N/A	
March-19	0	N/A	
April-19	0	N/A	
May-19	0	N/A	
June-19	0	n/a	
July-19	0	N/A	
August-19	0	N/A	
September-19	0	N/A	
October-19	0	N/A	
November-19	0	N/A	
December-19	0	N/A	
January-20	1	N/A	1/11-1/12; 002
February-20	0	N/A	
March-20	0	N/A	
April-20	0	N/A	
May-20	0	N/A	
June-20	1	N/A	6/30; 002
July-20	1	N/A	7/1; 002
August-20	0	N/A	
September-20	0	N/A	
October-20	1	N/A	10/29; 002
November-20	0	N/A	
December-20	0	N/A	
January-21	0	N/A	

February-21	0	N/A	
March-21	0	N/A	
April-21	0	N/A	
May-21	0	n/a	
June-21	0	n/a	
July-21	0	n/a	
August-21	0	n/a	
September-21	0	n/a	
October-21	0	n/a	
November-21	0	n/a	
December-21	0	n/a	
January-22	0	n/a	
February-22	0	n/a	
March-22	1	n/a	3/7; 002
April-22	0	n/a	
May-22	0	n/a	
June-22	0	n/a	
July-22	0	n/a	
August-22	0	n/a	
September-22	0	n/a	
October-22	0	n/a	
November-22	0	n/a	
December-22	0	n/a	
January-23	0	n/a	
February-23	0	n/a	
March-23	0	n/a	
April-23	0	n/a	
May-23	0	n/a	
June-23	0	n/a	
July-23	0	n/a	
August-23	0	n/a	
September-23	0	n/a	
October-23	0	n/a	

002 and 003	Notes:
2.19"	No comment page included in the CSO MRO submittals.
1.26"	
n/a	
9.2 MGD	
4.1 MGD	

Rainfall Intensity	Antecedent Moisture	Plant Maximization
although not qualifying storm event, large back-to-back storms.	yes	yes
back-to-back large storms.	yes	yes
trace	yes	yes
1-year storm with large storm previous day.	yes	yes

Rainfall Intensity:

Antecedent Moisture:

Plant Maximization:

Additional Comments:

Enforcement Discretion:

Does the rainfall event qualify as a 1-year, 1-hour or 10-year, 1-hour event?

Within 72 hours prior to the CSO event:

- Measurable precipitation (including snow/snowmelt)
 - Baseline conditions are flows within 120% of average dry weather flow**
-

The first day of the CSO event, the plant flow is reviewed to determine whether the peak hourly design flow is achieved.

Mechanical issues, power outages, high river levels, snowmelt, etc.

Determination and explanation.

**Also seems to be some discussion on whether to use "120% of average dry weather flow" vs. "average design flow". EPA PCM Guidance suggests using dry weather flow; average design flow may not accurately reflect antecedent conditions.