

**From:** [Baker, Judson T](#)  
**To:** [TERNIEDEN, LUCIO](#); [Sims, April](#)  
**Subject:** RE: [Scan] 2761002 L2A 06.24.24 Page 3  
**Date:** Tuesday, July 2, 2024 1:37:00 PM  
**Attachments:** [image001.png](#)

---

Thank you for the clarification Lucio!

In that case yes, I would identify the three issues below as pathways of contamination and therefore Sanitary Defects (the system must also submit a new SSP which I have not received yet).

Sincerely,



Judson T. Baker, Field Inspector  
Field Inspection Section-Drinking Water Branch  
Office of Water Quality-IDEM  
Northern Regional Office  
300 N. Dr. MLK Jr. Blvd, Ste 211, South Bend, IN 46601  
(574) 413-8833 • [JTBaker@idem.in.gov](mailto:JTBaker@idem.in.gov)

---

Indiana Department of Environmental Management

---

**From:** TERNIEDEN, LUCIO <[LTERNIED@idem.IN.gov](mailto:LTERNIED@idem.IN.gov)>  
**Sent:** Tuesday, July 2, 2024 1:27 PM  
**To:** [Sims, April](#) <[ASIMS@idem.IN.gov](mailto:ASIMS@idem.IN.gov)>; [Baker, Judson T](#) <[JTBaker@idem.IN.gov](mailto:JTBaker@idem.IN.gov)>  
**Subject:** RE: [Scan] 2761002 L2A 06.24.24 Page 3

Thank you for asking. Judson. When conducting a Level 2 using the forms site visit, the system has had E.coli in a mix of positive samples. Your job is to assess the pathway of contamination of bacteria into the water system. How did bacteria that live in the intestines of warm-blooded animals, associated with poo, end up in the drinking water sample. This interaction is considered critical so we can find and fix the problem.

In the process of conducting the Level 2 Assessment you are only looking for Pathways of Contamination, if you identify any that you would deem could have directly contributed to or caused the entrance of bacteria into the piping system or the sample, you would mark these as "Sanitary Defects" and Significant. These are the most critical items that the system will need to address to return to pulling clean samples.

Other issues such as salt bags on the floor or NSF or missing samples of Nitrates, etc. are not things that would contribute to bacterial contamination and should not be included in the

Level 2 Assessment. While they can be mentioned, these would carry a Minor or Recommendation severity. I like to keep it separated and only concentrate on what is causing the problem.

You can always go back later for another Sanitary Survey or Tech Assistance to see if the findings stuck or if you need to follow up on issues not addressed on the Level 2.

It has been a tendency of inspectors to try to be complete and address everything they find such as in a SS inspection. The two visits are for 2 different reasons. These even get more nuanced when conducting a SS/Level 2 Combo in SWIFT.

I think that you have it right below, to identify the 3 issues as Sig Defs.

Hope this helps. Let me know should you have any questions.

Lucio M. Ternieden, Chief  
Field Inspection Section-Drinking Water Branch  
Office of Water Quality-IDEM  
100 North Senate Avenue-MC: 66-34  
Indianapolis, IN 46204  
(317) 234-7461 • [LTernied@idem.IN.gov](mailto:LTernied@idem.IN.gov)

---

**From:** Sims, April <[ASIMS@idem.IN.gov](mailto:ASIMS@idem.IN.gov)>  
**Sent:** Tuesday, July 2, 2024 12:31 PM  
**To:** Baker, Judson T <[JTBaker@idem.IN.gov](mailto:JTBaker@idem.IN.gov)>; TERNIEDEN, LUCIO <[LTERNIED@idem.IN.gov](mailto:LTERNIED@idem.IN.gov)>  
**Subject:** RE: [Scan] 2761002 L2A 06.24.24 Page 3

Lucio, will you please help clarify what/how Sanitary Defects are identified during Level 2 Assessment site visits?

---

**From:** Baker, Judson T <[JTBaker@idem.IN.gov](mailto:JTBaker@idem.IN.gov)>  
**Sent:** Tuesday, July 2, 2024 11:52 AM  
**To:** Sims, April <[ASIMS@idem.IN.gov](mailto:ASIMS@idem.IN.gov)>; TERNIEDEN, LUCIO <[LTERNIED@idem.IN.gov](mailto:LTERNIED@idem.IN.gov)>  
**Subject:** RE: [Scan] 2761002 L2A 06.24.24 Page 3

April,

I don't think I am clear on what qualifies a deficiency during a Level 2 assessment as a sanitary defect. None of those three deficiencies were repeated from the previous site visit (11/10/2021) but those three defects are the most likely causes of the TC+ and EC+ samples.

Sincerely,

Judson T. Baker, Field Inspector  
Field Inspection Section-Drinking Water Branch  
Office of Water Quality-IDEM



Northern Regional Office  
300 N. Dr. MLK Jr. Blvd, Ste 211, South Bend, IN 46601  
(574) 413-8833 • [JTBaker@idem.in.gov](mailto:JTBaker@idem.in.gov)

---

Indiana Department of Environmental Management

---

**From:** Sims, April <[ASIMS@idem.IN.gov](mailto:ASIMS@idem.IN.gov)>  
**Sent:** Tuesday, July 2, 2024 11:49 AM  
**To:** Baker, Judson T <[JTBaker@idem.IN.gov](mailto:JTBaker@idem.IN.gov)>; TERNIEDEN, LUCIO <[LTERNIED@idem.IN.gov](mailto:LTERNIED@idem.IN.gov)>  
**Subject:** RE: [Scan] 2761002 L2A 06.24.24 Page 3

Thank you, Judson. Will you please be sure to mark the severity level (Recommendation, Minor or Significant) from now on for ALL issues you identify during Level 2 Assessments? I need this information to properly document the assessment data in SDWIS when entering the site visit information.

In this case, would you agree the following issues should be marked Significant:

Unapproved Sampling Location  
Cross Connection issues on all troughs  
Bladder Tank Waterlogged

Please let me know if these should be considered Significant or Minor.

Lastly, I noticed in the Page 3 summary you wrote that Response was required within 30 days. Please note that for Level 2 Assessments, any Significant Deficiencies would be considered Sanitary Defects, which MUST be CORRECTED in 30 days.

Thanks again.

---

**From:** Baker, Judson T <[JTBaker@idem.IN.gov](mailto:JTBaker@idem.IN.gov)>  
**Sent:** Friday, June 28, 2024 12:48 PM  
**To:** TERNIEDEN, LUCIO <[LTERNIED@idem.IN.gov](mailto:LTERNIED@idem.IN.gov)>; Judson, Edward <[ejudson@idem.IN.gov](mailto:ejudson@idem.IN.gov)>; Sims, April <[ASIMS@idem.IN.gov](mailto:ASIMS@idem.IN.gov)>; Tobias, Anthony <[ATobias@idem.IN.gov](mailto:ATobias@idem.IN.gov)>; MELVIN, ALAN <[AMELVIN@idem.IN.gov](mailto:AMELVIN@idem.IN.gov)>; Decastro, Sandra <[SDECASTR@idem.IN.gov](mailto:SDECASTR@idem.IN.gov)>  
**Subject:** FW: [Scan] 2761002 L2A 06.24.24 Page 3

Please see attached Level 2 form for 2761002 (Wild Winds Buffalo Preserve).

Sincerely,



Judson T. Baker, Field Inspector  
Field Inspection Section-Drinking Water Branch  
Office of Water Quality-IDEM  
Northern Regional Office  
300 N. Dr. MLK Jr. Blvd, Ste 211, South Bend, IN 46601  
(574) 413-8833 • [JTBaker@idem.in.gov](mailto:JTBaker@idem.in.gov)

---

Indiana Department of Environmental Management

---

**From:** Baker, Judson T <[JTBaker@idem.IN.gov](mailto:JTBaker@idem.IN.gov)>  
**Sent:** Friday, June 28, 2024 12:45 PM  
**To:** Baker, Judson T <[JTBaker@idem.IN.gov](mailto:JTBaker@idem.IN.gov)>  
**Subject:** [Scan] 2761002 L2A 06.24.24 Page 3

--

Sent with Genius Scan for iOS.

<https://dl.tglapp.com/genius-scan>

Judson Baker  
IDEM Drinking Water Field Inspector  
Northern Regional Office  
[JTBaker@idem.in.gov](mailto:JTBaker@idem.in.gov) | 574-413-8833