



# 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](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

VIA ELECTRONIC MAIL

March 12, 2024

The Honorable JD Wilson, Mayor  
City of Sullivan  
32 North Court Street  
Sullivan, IN 47882

Dear Mayor Wilson:

Re: Combined Sewer Overflow Program Audit  
City of Sullivan NPDES Permit No. IN0024554  
Sullivan County

This letter is to confirm the date of April 3, 2024, for a Combined Sewer Overflow (CSO) Program Audit to be conducted by the Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ). The audit will begin at 9:30 AM at the Sullivan Wastewater Treatment Plant located at 361 East State Road 54, Sullivan, Indiana. This audit will be a comprehensive review of all aspects of the CSO Long Term Control Plan (LTCP), the CSO Operational Plan (CSOOP), and their implementation status.

Please ensure the following documents will be available on-site to expedite the audit:

1. CSO LTCP;
2. CSOOP;
3. CSO MRO;
4. Post-Construction Monitoring data; and
5. Operation & Maintenance documentation.

Please complete the enclosed CSO Program Audit Form to the best of your ability. Please forward it to me at the email address provided below by March 27, 2024.

If you have any questions, please feel free to contact me at 317/233-0704 or [Jhanko@idem.IN.gov](mailto:Jhanko@idem.IN.gov).

Sincerely,

Jay Hanko, CSO Project Manager  
Municipal NPDES Permits Section  
Office of Water Quality



A State that Works

Enclosures

cc: Debra Padgett, Certified Operator  
Tony Burkhart, Superintendent  
Holly Zurcher, IDEM Wastewater Inspector



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*Commissioner*

May 17, 2024

## VIA ELECTRONIC MAIL

The Honorable JD Wilson, Mayor  
City of Sullivan  
32 North Court Street  
Sullivan, IN 47882

Dear Mayor Wilson:

Re: Combined Sewer Overflow Program  
Audit Summary  
City of Sullivan NPDES Permit No. IN0024554  
Sullivan County

On April 3, 2024, staff from the Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) conducted an audit of both the approved Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) and approved CSO Operational Plan (CSOOP) implementation in the City of Sullivan. Our appreciation goes out to Debra Pagett and her staff for participating in the CSO audit.

The Sullivan LTCP was approved in a modification of NPDES Permit No. IN0024554, issued December 29, 2006. The approved LTCP includes a twenty year plan to capture and provide full treatment to wet weather flows from up to and including the 10-year, 1-hour design storm. Full LTCP implementation is anticipated to be completed in 2026. The implementation schedule is enforced through Agreed Order Case No. 2002-11762-W.

The audit indicated that the City of Sullivan was in compliance with implementing the approved LTCP schedule. The following observations were made during the audit:

- The City has completed projects within Phase I of the LTCP, which is consistent with the LTCP Implementation Schedule being enforced through the Agreed Order.
- With the completion of the LTCP Phase I projects, Lagoon 4 was taken out of service and its associated lift station and outfall were demolished. Outfall 007 was relocated adjacent to Lagoon 4. The City must submit a permit modification request to IDEM within 45 days from the date of this letter to incorporate the new outfall location in the NPDES permit. The permit modification request will need to include the specific outfall location, latitude and longitude coordinates of the outfall, and receiving stream.



- The City needs a minimum of one intensity rain gauge for reporting precipitation. IDEM recommends the City evaluate the need for additional intensity rain gauges for the purposes of PCM and future level of control reviews, once Sullivan has fully implemented their CSO LTCP.

The City of Sullivan CSOOP was approved on April 19, 2002. The audit indicated that the City of Sullivan was not in compliance with implementing the approved plan. The following observations were made during the audit:

- The City has a CSOOP that was last updated in February 2014. However, an update to the CSOOP is necessary based on discussions during the audit. Please send IDEM correspondence within 45 days from the date of this letter outlining the City's commitment to updating the CSOOP along with a proposed timeframe for submitting the CSOOP update to IDEM. Please submit a copy that tracks/ highlights the changes from the previous submittal.
- CSO signage was present at all CSO outfalls; however, not all signage was visible from the receiving stream. Please submit photo documentation of the additional signage to IDEM within 45 days from the date of this letter.
- Sullivan completes a CSO Monthly Report of Operation (MRO) form each month to report untreated CSO discharges. IDEM observes several issues with accurately completing the form, which was discussed during the audit. These include, but are not limited to: observed WWTP Influent Average Daily Flow (MGD) and Peak Hourly Flow (MGD) are not being reported as required; Peak Intensity (inches per hour) and Measurement Interval (hr., 30 min., 15 min.) are not being reported as required; the Design Peak Hourly Flow (MGD) and Design Average Flow (MGD) reported in the header of the MRO are inconsistent with the flows that were approved in SRF Loan Approval No. CS182408 01, February 3, 2006; and including blank pages of the form are not necessary. Please complete future CSO MRO forms to address these issues.
- Sullivan needs to address where CSO flow can pond and become stagnant at CSO outfalls 004, 005, and 007 to prevent any nuisance conditions. This may include building up the area where ponding can occur or creating a channel to prevent CSO flow from collecting. Compliance with the minimum narrative limitations for discharge from any and all outfalls is a requirement of Sullivan's NPDES permit. Please submit photo documentation of this correction within 45 days from the date of this letter.
- When observing the regulator structures in manholes for the CSOs, several weir heights appeared shallow. IDEM recommends evaluating the possibility of raising the weir height where possible to increase collection system storage and prevent any unnecessary CSO discharges. These potential modifications should be analyzed to ensure they will not cause other problems, such as street or basement flooding.

- A discussion was held whether a backflow preventer is necessary on CSO 007. The City indicated they will investigate the need and may install a backflow preventer on the outfall in the future.
- IDEM recommends updating flow monitoring procedures/metering equipment at the CSOs in order to properly report all untreated CSO discharges on the CSO MRO form. The flow metering equipment can provide accurate data on the volumes of untreated discharges to properly move forward with implementing the LTCP and meeting the LTCP level of control upon full implementation of the plan.

Please respond to the items above within the specified timeframes listed. Please submit such correspondence to IDEM, Office of Water Quality, Municipal NPDES Permits Section. Please direct any questions regarding this letter to Jay Hanko at 317/233-0704 or by e-mail at [Jhanko@idem.IN.gov](mailto:Jhanko@idem.IN.gov).

Sincerely,

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

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

cc: Debra Pagett, Certified Operator  
Holly Zurcher, IDEM Wastewater Inspector  
Tony Burkhart, Superintendent