



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
*Governor*

**Brian Rockensuess**  
*Commissioner*

July 03, 2024

Via Email to: jmarsh@greensburg.in.gov  
The Honorable Joshua Marsh, Mayor  
City of Greensburg  
314 W Washington St  
Greensburg, Indiana 47240

Dear Mayor Marsh:

**Re: Inspection Summary/ Noncompliance Letter**  
Greensburg WWTP  
NPDES Permit No. IN0020133  
Greensburg, Decatur County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Office of Water Quality, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: July 01, 2024  
Type of Inspection: Compliance Evaluation Inspection  
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Pretreatment evaluation generated an unsatisfactory rating. The permittee has indicated on non-compliance reports that surfactants from a permitted industry have been interfering with the operation of the WWTP. Additionally, it appeared that surfactants were passing through the WWTP at the time of this inspection. The permittee does send notices of violation to their industries. They are currently working on permit revisions for Honda and have a Show Cause hearing scheduled for KB Foods.
2. The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
June	2023	001	Nickel	1
July	2023	001	Nickel	1
July	2023	001	TSS	2
July	2023	001	Phosphorus	1

July	2023	001	E. coli	3
August	2023	001	Nickel	1
September	2023	001	Nickel	1
October	2023	001	Nickel	1
November	2023	001	Nickel	1
May	2024	001	Phosphorus	1
May	2024	001	TSS	2

3. Please note the marginal ratings in Effluent Appearance, Facility/Site, Laboratory and Records/Reports on the enclosed inspection report. These items do not require a response but do require corrective action.

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 violations identified above.

Effective immediately, IDEM is initiating a program strongly encouraging domestic wastewater utilities to perform cybersecurity vulnerability assessments, and to take actions to mitigate identified vulnerabilities and increase the cybersecurity resilience of Indiana's water sector. Utilities can choose any assessment tool appropriate for the water sector, but IDEM is highlighting the following websites for information and helpful vulnerability assessment tools made available from the U.S. EPA and the American Water Works Association: <https://www.epa.gov/waterresilience/epa-cybersecurity-water-sector> and <https://www.awwa.org/Resources-Tools/Resource-Topics/Risk-Resilience/Cybersecurity-Guidance>. IDEM will continue to share important updates on the cybersecurity of the water sector.

Within 30 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in formal enforcement action. Please direct your response to this letter to our letterhead address or via email to [wwViolationResponse@idem.IN.gov](mailto:wwViolationResponse@idem.IN.gov). Any questions should be directed to Becky Ruark at 317-691-1909 or by email to [bruark@idem.IN.gov](mailto:bruark@idem.IN.gov). Thank you for your attention to this matter.

Sincerely,



Kim Rohr, Chief  
Wastewater Inspection Section  
Office of Water Quality

Enclosure



# NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0020133</b>		Facility Type: Municipality		Facility Classification: Major		Facility Classification: IV		TEMPO AI ID	
Date(s) of Inspection: July 01, 2024									
Type of Inspection: Compliance Evaluation Inspection									
Name and Location of Facility Inspected: <b>Greensburg WWTP</b> 950 S Broadway Greensburg IN 47240				Receiving Waters: Gas Creek		Permit Expiration Date: 9/30/2024			
County: Decatur						Design Flow: 8.9MGD			
On Site Representative(s): First Name      Last Name      Title      Email      Phone Zeke      Smith      Superintendent      zsmith@greensburg.in.gov									
Was a verbal summary of findings presented to the on-site representative? <b>Yes</b>									
Certified Operator: Zeke Smith		Number: 21706	Class: IV	Effective Date: 7-1-24	Expiration Date: 6-30-27	Email: zsmith@greensburg.in.gov			
Cyber Security Contact: Name: _____ Email: _____									
Responsible Official: The Honorable Joshua Marsh, Mayor 314 W Washington St Greensburg, Indiana 47240					Permittee: City of Greensburg Email: jmarsh@greensburg.in.gov Phone: _____ Fax: _____				
					Contacted? No				
<b>INSPECTION FINDINGS</b>									
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Potential problems were discovered or observed. (3) <input checked="" type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)									
<b>AREAS EVALUATED DURING INSPECTION</b>									
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>									
S	Receiving Waters	M	Facility/Site	S	Self-Monitoring	N	Enforcement		
M	Effluent	S	Operation	S	Flow Measurement	U	Pretreatment		
S	Permit	S	Maintenance	M	Laboratory	U	Effluent Limits Compliance		
S	Collection System	S	Sludge Disposal	M	Records/Reports	N	Other:		
<b>DETAILED AREA EVALUATIONS</b>									
<b>Receiving Waters:</b>									
S 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.									
Comments: The receiving stream was free of notable algae or solids. While there was foam in a pool immediately adjacent to the outfall, the foam did not persist downstream.									
<b>Effluent:</b>									
M 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.									
Comments: Effluent appearance was rated as marginal. The effluent had an obvious white fluffy foam present indicating the presence of surfactants. The effluent was clear and free of color.									
<b>Permit:</b>									
S 1. Did the facility have a current copy of the permit available for reference?									

- S 2. If the permit expires within 180 days, has a renewal application been submitted?
- S 3. Receiving waters and Facility Description in the permit reflect actual conditions at the facility.
- N 4. The permit has been properly transferred if there is a new owner.
- N 5. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

Comments:

The facility was found to have a valid permit and the facility description, including units of treatment and receiving stream, is accurate. A renewal application has been submitted by the permittee to IDEM.

**Collection System:**

- N 1. CSO's were found to be adequately monitored and maintained.
- S 2. There were zero reported maintenance-related (clogged or blocked lines) overflow events in last 12 months.
- S 3. There were zero reported hydraulic (I&I) overflow events in last 12 months.
- N 4. Facility has met SSO and dry weather CSO reporting requirements
- N 5. Any adverse impacts from SSO and CSO events have been properly mitigated.
- S 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.
- S 7. Collection system maintenance activities appeared to be adequate.

Comments:

No known overflows have occurred in the last 12 months. The permittee has 17 lift stations. All are checked seven days per week by facility staff. The 5 largest have Watch Dog remote monitoring. All have audible and visual alarms. The permittee does jet rodding, sewer cleaning, and cameras sewers as needed. There are 82 miles of sewer lines and crews are out everyday doing work in the collection system. The CSO LTCP is fully implemented. One prohibited bypass (outfall 007) remains at the WWTP. It has not been used in at least 3 years.

**Facility/Site:**

- M 1. The facility was found to have standby power or equivalent provision.
- S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility and lift stations.
- S 3. Safe and adequate access was provided for inspection of all units and outfalls.
- S 4. Facilities and equipment did not appear beyond their useful life.
- 5. List any safety concerns:

Comments:

Facility/Site was rated as marginal. On June 29, 2024, the plant lost power due to thunderstorms. The large generator failed when trying to start. A second generator was able to run the pumps that take wastewater to the equalization basin. During the one hour power outage, flow was sent to the EQ basin, then later returned to the WWTP for full treatment. A generator repair is scheduled for this week. A SCADA system will alert operators via phone call when equipment failure occurs. The facility and the outfall were accessible for inspection.

**Operation:**

- S 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including a report for an anticipated bypass report for steps of treatment taken out of service.
- S 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:
  - a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
  - b. Adequate documentation of operational activities, including system monitoring and cleaning.
  - c. Adequate funding to ensure proper operation.
- S 3. Solids handling procedures include:
  - a. Sufficient solids wasted from the treatment system, in a timely manner, to maintain process efficiency.
  - b. Wasting of solids based on appropriate operational targets and valid process control testing.
  - c. Adequate documentation of solids removal, handling, or control was available for review.
- N 4. The facility was found to be operated efficiently during wet weather events.

Comments:

All units of treatment appeared to be operated efficiently. While there was foaming evident in the vertical loop reactor units, it did not seem to prevent efficient operation at the time of this inspection. Clarifiers had some scum on the surface, but clarifier effluent was clear. Flow in the post aeration tank was clear. A new UV system had been installed prior to April 1st.

**Maintenance:**

- S 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- S 2. Facility maintenance activities appeared to be adequate.

## Comments:

The WWTP appeared to be adequately maintained. Preventative maintenance (PM) activities are tracked in maintenance logs. A PM schedule is included in the log book. Repairs are also documented.

The VLR Train 1 must be returned to service. The previous operator did not use this train of treatment and instead stored sludge in it. Additionally, parts were robbed from it to make repairs to VLR Train 2. If this unit was emptied, repaired and returned to service more efficient operation would occur.

**Sludge Disposal:**

- S 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

## Comments:

A records review during the inspection showed adequate handling and disposal of sludge. Sludge is dewatered and land applied under permit INLA000465. In October 2023, approximately 788 dry tons were land applied. In May 2024, approximately 903 dry tons were land applied.

**Self-Monitoring:**

- S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
- N 2. Flow-proportioned samples were found to be obtained where needed.
- S 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.
- S 4. Sample collection procedures, including automatic sampling, were found to include:
  - a. Samples refrigerated during compositing.
  - b. Proper preservation techniques used.
  - c. Containers and holding times conformed to 40 CFR 136.3.
- S 5. Sample documentation was found to be adequate and included:
  - a. Dates, times, and locations of sampling.
  - b. Name of individual performing sampling.
  - c. Instantaneous flow for flow-weighted aliquots.
  - d. Chain of Custody records.
- S 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were found to be met.

## Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices, including influent, effluent, and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. Auto samplers are used for composite samples. Grab samples are well documented.

**Flow Measurement:**

- S 1. Flow was found to be properly monitored as required by the permit.
- S 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.
- N 3. The stream flow gauging station is calibrated as often as necessary to provide accurate and reliable data, but at least once every 12 months.
- N 4. A copy of the stream flow calibration curve or table is submitted to IDEM (OWQ Compliance Data Section) no later than October 1 of each year.

## Comments:

The facility's flow measurement program, including all documentation, was found to be adequate and representative. The effluent flow meter was last calibrated in August 2024 by BL Anderson.

**Laboratory:**

The following laboratory records were reviewed:

CBOD Bench Sheets            TSS Bench Sheets            Ammonia Bench Sheets

Phosphorus Bench Sheets    E. coli Bench Sheets

- M 1. The laboratory practices and protocol reviewed were adequate, including:

- a. A written laboratory QA/QC manual was available.
- b. Samples were found to be properly stored.
- c. Approved analytical methods were found to be used.
- d. Calibration and maintenance of instruments was found to be adequate.
- e. QA/QC procedures were found to be adequate.
- f. Dates of analyses (and times where required) were recorded.
- g. Name of person performing analyses was recorded.

S 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

### Contract Lab Information

Element	Fort Wayne
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Comments:

The Laboratory evaluation generated a marginal rating. The following improvements must be implemented in laboratory procedures.

CBOD - Seed was not showing sufficient depletion. Inspector recommended the use of a commercial seed and discussed appropriate volumes to use. The seed must have a depletion of 2 mg/L and the seed correction factor should be between 0.6 and 1.0 mg/L. Only samples that have a 5 day DO of at least 1.0 mg/L and a depletion of 2 mg/L should be used to calculate the CBOD of a sample. Volumes must be changed if these requirements are not met.

TSS - If samples take more than 10 minutes to filter, the sample size must be decreased. An appropriate sample volume should be chosen to result in a minimum residue of 0.0025 grams.

#### Records/Reports:

The following records/reports were reviewed:

DMRs for the period of June 2023 to May 2024 were reviewed as part of the inspection.

S 1. All facility records for the period including the previous three years were available for review.

M 2. DMRs and MROs were found to be completed properly and accurately including:

- a. "No Ex" column was accurate.
- b. Signatory requirements were met.
- c. Reports were prepared by or under the direction of a certified operator.

S 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:

The Records/Reports evaluation generated a marginal rating. The DMRs and MROs for September 2023 to May 2024 must be reviewed and revised and resubmitted if necessary. In at least the most recent two reports, TKN was reported instead of Total Nitrogen as required by the permit.

#### Enforcement:

N 1. Agreed Order and/or Compliance Plan milestones have been met.

Comments:

There was no Agreed Order at the time of the inspection. Both Agreed Orders have been closed out prior to this inspection.

#### Pretreatment:

U 1. No evidence of interference from industrial or other sources of toxic substances was noted.

S 2. For both Delegated and Non-Delegated pretreatment programs:

- a. Industrial or commercial dischargers were found to be regulated as required.
- b. The permittee was found to enforce the Sewer Use Ordinance (SUO) and the Enforcement Response Plan (ERP).

N 3. If the non-delegated permittee accepts hauled waste:

- a. Does the POTW provide written permission to haulers?
- b. Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
- c. Does the POTW retain records of each load?

Comments:

The Pretreatment evaluation generated an unsatisfactory rating. The permittee has indicated on non-compliance reports that surfactants from a permitted industry have been interfering with the operation of the WWTP. Additionally, it appeared that surfactants were passing through the WWTP at the time of this inspection. The permittee does send notices of violation to their industries. They are currently working on permit revisions for Honda and have a Show Cause hearing scheduled for KB Foods.

#### Effluent Limits Compliance:

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of June 2023 to May 2024 were reviewed as part of the inspection.

Yes 2. Were violations noted during the review of DMRs?

The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
June	2023	001	Nickel	1
July	2023	001	Nickel	1
July	2023	001	TSS	2
July	2023	001	Phosphorus	1
July	2023	001	E. coli	3
August	2023	001	Nickel	1
September	2023	001	Nickel	1
October	2023	001	Nickel	1
November	2023	001	Nickel	1
May	2024	001	Phosphorus	1
May	2024	001	TSS	2

Comments:

**IDEM REPRESENTATIVE**

Inspector Name:  
Becky Ruark

Email:  
bruark@idem.IN.gov

Phone Number:  
317-691-1909

**IDEM MANAGER REVIEW**

IDEM Manager:

Kim Rohr

Date:

7/3/2024