

# **Indiana Department of Environmental Management**

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb

Brian Rockensuess
Commissioner

July 02, 2024

<u>Via Email to:</u> emoyerjr@me.com Mr. Edward Moyer Jr., Town Council President Town of Hillsboro PO Box 59 Hillsboro. Indiana 47987

Dear Mr. Moyer Jr.:

Re: Inspection Summary Letter
Hillsboro Wastewater Treatment Plant
NPDES Permit No. IN0040118
Hillsboro, Fountain 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: Potential problems were discovered or observed.

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: <a href="https://www.epa.gov/waterresilience/epa-cybersecurity-water-sector">https://www.epa.gov/waterresilience/epa-cybersecurity-water-sector</a> and <a href="https://www.awwa.org/Resources-Tools/Resource-Topics/Risk-Resilience/Cybersecurity-Guidance">https://www.awwa.org/Resources-Tools/Resource-Topics/Risk-Resilience/Cybersecurity-Guidance</a>. IDEM will continue to share important updates on the cybersecurity of the water sector.

A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Maggie Kroeger at 317-619-3639 or by email to mkroeger@idem.IN.gov.

Sincerely,

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Kim Rohr, Chief Wastewater Inspection Section Office of Water Quality

Enclosure



# NPDES Wastewater Facility Inspection Report INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDE	S Permit Number:	Facility Type:						Facility Classification:		Т	EMPO AI ID
	IN0040118	Municipality				Mine	or	ı			35025
Date	(s) of Inspection: July	01, 2024					•				
		liance Eva	luation l	Inspection							
	and Location of Facility Inspec					Receiving Wa	ters:				t Expiration Date
Hillsboro Wastewater Treatment Plant										(	9/30/2024
	E US Hwv 136	County:				East Fork of					
Hills		IN 47987 Fountain								C	.04515MGD
On Sit	e Representative(s): lame        Last Name	Title		Email					Pho	one	
Tom					oro					8-2569	
	Was a verbal summa	ary of find	linas nr	esented to	the	on-site re	enresen	tative?	Yes		
Certific		Number:	Class:	Effective Date:	Ex	piration Date:	Email:	tative.			
Tom Fishero 1		15587 I		7-1-24	7-1-24		6-30-27 hillsborow		water@tds.net		
Cybe	er Security Contact:										
Name: Email:											
Responsible Official: Permittee: Town of Hillsboro											
	Edward Moyer Jr., Town C		Email: emoyerjr@me.com								
	PO Box 59						Phone: 217-412-3128				
Hillsboro, Indiana 47987						Fax:					No
INSPECTION FINDINGS											
O Conditions evaluated were found to be satisfactory at the time of the inspection. (5)											
○ Violations were discovered but corrected during the inspection. (4)											
Potential problems were discovered or observed. (3)											
○ Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)											
○ Violations were discovered and may subject you to an appropriate enforcement response. (1)  AREAS EVALUATED DURING INSPECTION											
				= Marginal, U				aluated			
S	Receiving Waters	S	Facility	//Site	S	Self-Monitoring		N Enforcer		nent	
S	S Effluent		Operation		S	Flow Measurement		: N	Pretreatm		
S			Mainte	Maintenance		Laboratory S Effluent L		imits Compliance			
S	Collection System	S	Sludae	e Disposal	S	Records/R	eports	N	Other:		
			_				•				
DETAILED AREA EVALUATIONS  Receiving Waters:  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 observed near the concrete outfall structure and was free of notable foam, algae or solids.											
Efflu	ent:										
S	1. Final effluent was free	e of excess	ive solic	ds, floating d	ebri	s, oil, scum,	, or billov	vy foam			
at th	effluent was observed at e time of the inspection.	the final flo	w mete	r and the co	ncre	te outfall sti	ructure a	nd was	clear and f	ree o	of color
Pern S	<b>nit:</b> 1. Did the facility have a	current co	py of the	e permit ava	ilabl	e for refere	nce?				

- 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 new permit was issued and will become effective on October 1, 2024.

# **Collection System:**

- N 1. CSO's were found to be adequately monitored and maintained.
- S 2. There were no reported maintenance-related (clogged or blocked lines) overflow events in last 12 months.
- S 3. There were no 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:

The facility's collection system is comprised of 100% separated sanitary sewers by design with no overflow or bypass points identified in the permit. The facility did not report any overflow or bypass events in the last twelve months. The six lift stations in the collection system are inspected in-detail once each week and logged on maintenance sheets. Drive-by checks of the lift stations are performed daily. Lift stations #4, #5, and #6 are cleaned once each year and lift stations #1, #2, and #3 are cleaned twice each year. The Town keeps back-up pumps stocked for all lift stations as lift stations #4 and #5 only have one pump. Lift stations #1, #3, and #6 were evaluated as part of this inspection. Minimal grease build up was noted in the wet well at lift station #3. The facility received construction permit approval No. 24747 on October 3, 2022, to extend their sewer system and add a lift station. Lift station #6 was added as part of the construction and appeared very clean at the time of the inspection.

# Facility/Site:

- S 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:

The facility grounds appeared to be well maintained. Adequate access was provided to all units of treatment and the outfall. The standby generator is tested every Monday for its readiness during power outages and is monitored by a Sensaphone auto-dialer alarm system. All lift stations have audible and visual alarms with connection ports for a portable generator. The connection port for a portable generator has not been installed on new lift station #6. In addition, the audible alarm on lift station #5 is currently broken. The replacement part has been ordered.

## 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. The manual bar screen is cleaned frequently. Good

color and mixing was observed in the aeration basin. The secondary clarifier appeared very clear with no solids or algae noted on the weirs at the time of the inspection. The operator was preparing to decant the digester at the time of the inspection. Tablets are used in the chlorination disinfection system and appeared to be operated as efficiently as possible. The operator conducts routine wasting and documents all operational activities on daily operation logs.

### 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:

Maintenance activities, such as cleaning and minor repairs, are documented on the daily operation logs. Preventative maintenance is tracked and documented on a white board. All maintenance activities appeared to be adequate at the time of the inspection.

## 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. Karle Enviro Organic Recycling Inc. hauled 22 tons of sludge off-site for disposal on April 8, 2024.

The facility utilizes two sludge drying beds and a geo-textile bag system for handling and dewatering sludge.

# 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.
- N 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 raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit.

# 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 calibrated on May 31, 2024 by BL Anderson.

## Laboratory:

The following laboratory records were reviewed:

Chlorine Bench Sheets pH Bench Sheets CBOD Bench Sheets

TSS Bench Sheets

Contract Lab Reports

Chain-of-Custody

D. O. 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**

Environmental Labs - Ammonia

Madison, IN

Comments:

The laboratory evaluation generated a marginal rating. A review of the TSS bench sheets noted duplicate samples were being conducted, but no blanks were being analyzed. TSS blanks must be ran each sampling day for QA/QC using the same sample volume as the final. It is noted, the facility began analyzing TSS blanks mid-June 2024.

Bench sheets from January 2024 and April 2024 were reviewed during the inspection. *E. coli* bench sheets from June 2024 were reviewed. Contract lab reports and chain-of-custody forms from December 2023 and February 2024 were reviewed.

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

#### Comments

The monthly records were available on-site, but the reports were reviewed on Virtual File Cabinet or NetDMR by the inspector before the on-site inspection. The monthly records reviewed on NetDMR appeared to be accurate and complete.

## **Enforcement:**

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

Comments:

There was no Agreed Order at the time of the inspection.

# **Pretreatment:**

- N 1. No evidence of interference from industrial or other sources of toxic substances was noted.
- N 2. For both Delegated and Non-Delegated pretreatment programs:
  - a. Industrial or commercial dischargers were found to be regulated as required.
  - b. The permitee 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 facility has no industrial sources and does not accept hauled waste.

# **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.

No 2. Were violations noted during the review of DMRs?

Comments:

A records review indicated no effluent violations have been reported during the period reviewed.

IDEM REPRESENTATIVE									
Inspector Name:	Email:	Phone Number:							
Maggie Kroeger	mkroeger@idem.IN.gov	317-619-3639							
IDEM MANAGER REVIEW									
IDEM Manager:		Date:							
Kim Rohr		7/2/2024							