



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 25, 2024

Via Email to: gnelson@princeslakes.in.gov
Mr. Greg Nelson, Town Council President
Town of Prince's Lake
14 E. Lakeview Dr.
Nineveh, Indiana 46164

Re: **Noncompliance Letter** dated 4/30/24
Prince's Lakes WWTP
NPDES Permit No. IN0042366
Taylorsville, Bartholomew County

Dear Mr. Nelson:

A Noncompliance letter of the above referenced facility or location was emailed to you on April 30, 2024. A **written response** from the Town of Prince's Lakes was **required to be submitted** to IDEM no later than May 30, 2024; to date **a response has not been received**. A copy of the Letter is enclosed. Please respond within 10 days.

Thank you for your attention to this matter. If you have any questions, please contact Kevin Stark at 812-525-9411, or by email at kstark@idem.in.gov. Please direct your response via e-mail, along with the requested information, to wwViolationResponse@idem.in.gov.

Sincerely,

Kim Rohr, Chief
Wastewater Inspections Section
Office of Water Quality

Enclosure

c: Scott Blackwell, Operator, sblackwell.plu@gmail.com
VFC





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Eric J. Holcomb
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April 30, 2024

Via Email to: gnelson@princeslakes.in.gov
Mr. Greg Nelson, Town Council President
Town of Prince's Lake
14 E. Lakeview Dr.
Nineveh, Indiana 46164

Dear Mr. Nelson:

Re: Inspection Summary/ Noncompliance Letter
Prince's Lakes WWTP
NPDES Permit No. IN0042366
Taylorsville, Bartholomew 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: April 29, 2024
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

The Laboratory evaluation generated an unsatisfactory rating. Part I. B. 5 of the permit requires the analytical and sampling methods used to conform to the current version of 40 CFR, Part 136, unless otherwise specified. At the time of the inspection the following was noted:

- A. For pH, since a table top instrument is used, sample and analysis times must be included on the bench sheet to ensure hold times are met. Also, for pH, the meter must be calibrated each day of use and documented.
- B. For TSS, volume of sample must be increased to meet the minimum residue requirement of 0.0025 g. Analyst must increase sample volume (up to 1000 mL) to meet the minimum residue. Also, the color indicating desiccant was pink (wet), and it should be blue (dry). The desiccant must be replaced or recharged (dried out) to ensure accurate TSS analysis.
- C. For CBOD, blanks should consistently have 0 +/- 0.2 mg/L depletion. Many of the blanks reviewed were not within this acceptable range. Often, cleaning, dilution water source, and dilution water handling must be considered to determine the problem with blanks. Inspector recommends a thorough rinse of BOD bottles after cleaning/new bottles.

- D. Also for CBOD, initial DO reading should not be over 9.0 mg/L at 20 degrees Celsius as this indicates supersaturation. To prevent loss of oxygen during incubation of these samples, the DO should be reduced by shaking the sample or aerating it with filtered compressed air.
- E. For TSS and CBOD, a blank and duplicate must be ran with each batch.
- F. For E.coli, the bench sheet must include set up and read out times to ensure proper incubation. Also, the method of analysis must be recorded on the bench sheets.
- G. For Ammonia, bench sheets must improve to include sample, analysis times, and method of analysis.
- H. In accordance with 327 IAC 5-1-3, your facility was required to participate in the DMR-QA 43 Laboratory Proficiency Study in 2023. This study required your facility to submit analytical testing data to IDEM by September 29, 2023. To date, this information has not been received. For additional information regarding this data, please reach out to Maggie Kroeger at Mkroeger@idem.IN.gov

For your information, IDEM offers free laboratory assistance/training. If you are interested in receiving laboratory assistance, please contact Becky Ruark at 317- 691-1909 or at bruark@idem.in.gov

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.

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. Any questions should be directed to Kevin Stark at 812-525-9411 or by email to kstark@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Handwritten signature of Kim Rohr in black ink, consisting of stylized initials 'KR' followed by a surname 'Rohr'.

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0042366	Facility Type: Municipality	Facility Classification: Major	TEMPO AI ID III
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Date(s) of Inspection: April 29, 2024

Type of Inspection: Compliance Evaluation Inspection

Name and Location of Facility Inspected: Prince's Lakes WWTP 4600 Hendricks Ford Rd. Taylorsville IN 46124	County: Bartholomew	Receiving Waters: Driftwood River	Permit Expiration Date: 8/31/2025
			Design Flow: 2.0MGD

On Site Representative(s):				
First Name	Last Name	Title	Email	Phone
Scott	Blackwell	Superintendent	sblackwell.plu@gmail.com	812-526-2126
Remmington	Tearman	Laborer	rrtearman@hotmail.com	317-494-3678
Roy	Yates	Lab Tech	royyates@yahoo.com	317-412-2188

Was a verbal summary of findings presented to the on-site representative? **Yes**

Certified Operator: Scott Blackwell	Number: 19592	Class: IV	Effective Date: 7-1-21	Expiration Date: 6-30-24	Email: sblackwell.plu@gmail.com
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Cyber Security Contact:
Name: NA Email:

Responsible Official: Mr. Greg Nelson, Town Council President 14 E. Lakeview Dr. Nineveh, Indiana 46164	Permittee: Town of Prince's Lake Email: gnelson@princeslakes.in.gov Phone: 317-694-2465 Contacted? Yes
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INSPECTION FINDINGS

- 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

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Receiving Waters	S	Facility/Site	M	Self-Monitoring	N	Enforcement
S	Effluent	S	Operation	S	Flow Measurement	S	Pretreatment
S	Permit	M	Maintenance	U	Laboratory	S	Effluent Limits Compliance
M	Collection System	S	Sludge Disposal	M	Records/Reports	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 free of notable foam, algae or solids.

Effluent:
S 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.
 Comments:
 The effluent was clear and free of color at the time of the inspection.

Permit:
S 1. Did the facility have a current copy of the permit available for reference?

- N 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.

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.
- M 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.
- M 7. Collection system maintenance activities appeared to be adequate.

Comments:

The Collection System area was rated as marginal due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which requires the facility to have an ongoing preventative maintenance program for the sanitary sewer system.

As part of this inspection, the Gerking and Main lift stations were inspected along with one grinder station located at City Hall. The Gerking lift station only had one operational pump, Part II. B. 1 of the permit requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, this includes the collection system.

Lift stations are checked 5x week. There are 586 grinder stations, four lift stations, and a few satellite lift stations. Documentation of lift station inspections must improve.

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. The facility and Main lift station are equipped with standby generators that are tested weekly and serviced annually. The facility is equipped with SCADA alarm system. All lift stations and grinder stations are equipped with visual and audible alarms. Safe and adequate access was provided for inspection of all treatment units including the outfall.

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.

Maintenance:

- M 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 was rated as marginal due to an inadequate preventative maintenance program. Currently, the facility does not have a preventative maintenance plan. The facility should establish a preventative maintenance program in the near future. The facility's maintenance activities appeared to be adequate at the time of the inspection. Daily maintenance checks and activities are recorded on a daily log sheet which were available for review upon 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. The facility contracted Bestway Disposal to haul 547 dry tons to the Southside Landfill in the past 12 months.

Self-Monitoring:

- S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
- S 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.
- M 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 generated a marginal rating. The hoses on the influent and effluent auto samplers appeared moderately dirty at the time of the inspection. The collection hoses should be changed on a routine basis. Also, the facility should install certified thermometers inside the auto samplers to ensure proper holding temperature of <6 degrees Celsius.

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 influent and effluent flow meters were last calibrated March 2024, by BL Anderson.

Laboratory:

The following laboratory records were reviewed:

CBOD Bench Sheets	Ammonia Bench Sheets	TSS Bench Sheets
Phos. Bench Sheets	E. coli Bench Sheets	pH Bench Sheets

- U 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.

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

Comments:

The Laboratory evaluation generated an unsatisfactory rating. Part I. B. 5 of the permit requires the analytical and sampling methods used to conform to the current version of 40 CFR, Part 136, unless otherwise specified. At the time of the inspection the following was noted:

- A. For pH, since a table top instrument is used, sample and analysis times must be included on the bench sheet to ensure hold times are met. Also, for pH, the meter must be calibrated each day of use and documented.
- B. For TSS, volume of sample must be increased to meet the minimum residue requirement of 0.0025 g. Analyst must increase sample volume (up to 1000 mL) to meet the minimum residue. Also, the color indicating desiccant was pink (wet), and it should be blue (dry). The desiccant must be replaced or recharged (dried out) to ensure accurate TSS analysis.
- C. For CBOD, blanks should consistently have 0 +/- 0.2 mg/L depletion. Many of the blanks reviewed were not within this acceptable range. Often, cleaning, dilution water source, and dilution water handling must be considered to determine the problem with blanks. Inspector recommends a thorough rinse of BOD bottles after cleaning/new bottles.
- D. Also for CBOD, initial DO reading should not be over 9.0 mg/L at 20 degrees Celsius as this indicates supersaturation. To prevent loss of oxygen during incubation of these samples, the DO should be reduced by shaking the sample or aerating it with filtered compressed air.
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- H. In accordance with 327 IAC 5-1-3, your facility was required to participate in the DMR-QA 43 Laboratory Proficiency Study in 2023. This study required your facility to submit analytical testing data to IDEM by September 29, 2023. To date, this information has not been received. For additional information regarding this data, please reach out to Maggie Kroeger at Mkroeger@idem.IN.gov

For your information, IDEM offers free laboratory assistance/training. If you are interested in receiving laboratory assistance, please contact Becky Ruark at 317- 691-1909 or at bruark@idem.in.gov

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of March 2023 to February 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.

U 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 Records/Reports evaluation generated a marginal rating. Part I. B. 3 of the permit requires the permittee to submit monitoring reports postmarked no later than the 28th day of the month following each completed monitoring period. These reports shall include the Discharge Monitoring Report (DMR) and the Monthly Report of Operation (MRO). At the time of the inspection, it was determined that many of the records reviewed were submitted after the due date.

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.

Pretreatment:

S 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 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 facility has no industrial sources. The facility does not accept septage waste; however, does accept a significant amount of port-a-pot waste. The port-a-pot waste is pumped into one of two settling tanks located at the headworks. The flow is slowly brought into the plant to avoid upsets. There was a significant amount of trash/debris in settling tank utilized. The tank is drained and cleaned out on an annual basis. There were no trash/debris issues observed in the treatment plant.

Effluent Limits Compliance:

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

DMRs for the period of March 2023 to February 2024 were reviewed as part of the inspection.

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

Comments:

There have been no self reported effluent limit violations during the review period.

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Kevin Stark	kstark@idem.IN.gov	812-525-9411

IDEM MANAGER REVIEW

IDEM Manager:	Date:
Kim Rohr	4/30/2024