



## 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 Rockensuess**  
*Commissioner*

June 21, 2024

Via Email to: drhoads@washingtonin.us  
The Honorable David Rhoads, Mayor  
City of Washington  
200 Harned Avenue  
Washington, Indiana 47501

Dear Mayor Rhoads:

**Re: Inspection Summary/ Noncompliance Letter**  
Washington Wastewater Treatment Plant  
NPDES Permit No. IN0025658  
Washington, Daviess 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: June 18, 2024  
Type of Inspection: Compliance Evaluation Inspection  
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Collection System evaluation generated a marginal rating. Attachment A of the permit states that discharges from any portion of the sewer collection system, except flow from the Wastewater Treatment Plant (WWTP) via Outfall 001 or the Wet Weather Treatment Facility via Outfall 010, are prohibited. Based on the monthly CSO data, it appears that the facility experienced five prohibited CSO events from May 2023 through April 2024. It is noted that the WWTP was not able to maximize flow through the main plant due to the noted issues in Operations. This likely contributed to some of the prohibited CSOs. Also, the influent structure ahead of the CSO EQ basin and CSO 003 appears to be undersized for extreme wet weather events. CSOs from 003 could occur during extreme events even with flows being diverted to the CSO EQ and maximizing the WWTP based on the magnitude of flow coming into the structure. This information will be forwarded to your CSO project manager in conjunction with review of your level of control. There is no need to respond to this portion of the inspection at this time.

Part II. B. 2 of the permit prohibits overflows, pursuant to 327 IAC 5-2-8(11).

A records review indicates that three SSO events occurred from May 2023 through April 2024.

Lift station maintenance appeared mostly adequate, however documentation of inspections, cleaning, and maintenance should be improved.

2. Facility/Site was rated unsatisfactory for the alarm system on the SBRs not functioning with the facility's SCADA system. The weekend prior to this inspection, the facility lost power to the blower to one side of the SBRs. This power loss did not trigger alarms on the facility's SCADA system. The SBR had no aeration for the weekend and turned septic (see photo). Part II. B. 1. b. of the permit requires that the facility be operated in a manner which will minimize discharges of excessive pollutants. Part II. B. 5 of the permit requires the permittee to either provide an alternative power source or control the discharge in order to maintain compliance with the effluent limitations and prohibitions of the permit.
3. Operation was rated as unsatisfactory for the review period due to the SBRs being offline, however it is noted that the SBRs were back online by the time this inspection was conducted. The SBRs being offline contributed to numerous effluent limit exceedances and did not allow for maximization at the WWTP in wet weather to alleviate CSOs. It is noted that staff appeared to be operating the functioning portion of the plant as best as possible during that period. 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.

The SBRs are now online, but having some operational problems. One SBR was septic at the time of the inspection due to a blower going down over the weekend. Staff are investigating wasting problems with the SBRs as well.

At the CSO Wetland, operations may also need to be adjusted. Details of the wetland can be found under Construction Permit Approval No. L-0350, dated May 20, 2010. The wetland has a slow leak at the discharge due to a gate being left open. Staff should review the design specifications for the wetland and adjust operations to operate the wetland as-designed. This information will be relayed to the CSO Section for further review.

4. Maintenance was rated as unsatisfactory for the review period since the SBRs were not operational until May 2024, though it is noted that the SBRs were back online by the time this inspection was conducted. Various other issues were noted:
  - A. Wasting pumps from the SBRs are not fully operational.
  - B. The grit line is plugged on the "old plant" and needs to be cleaned to provide grit removal.
  - C. Some UV banks are out of service at the WWTP and half of the UV

- units are out of service at the CSO Wetland.
- D. One primary clarifier was out of service due to a broken T-valve.
- E. There is a constant slow leak of flow from the CSO Wetland that needs to be addressed.
- F. The liner in the final wetland pond is still ripped.
- G. The CSO EQ tank needs to be fully drained between storm events and cleaned of solids.

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, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

Staff have started a basic maintenance records binder, though a more formal PM plan should be developed.

5. The Self Monitoring Program was rated as marginal. Most sampling practices are conducted accurately and at the frequency required by the permit. However, intermediate sampling is only being conducted 5 times each week. Part I. B. 2. of the permit states that the raw influent and the wastewater from intermediate unit treatment processes, as well as the final effluent shall be sampled and analyzed for the pollutants and operational parameters specified by the applicable Monthly Report of Operation Form, as appropriate, in accordance with 327 IAC 5-2-13. Except where the permit specifically states otherwise, the sample frequency for the raw influent and intermediate unit treatment process shall be at a minimum the same frequency as that for the final effluent. The measurement frequencies specified in each of the tables in Part I.A. are the minimum frequencies required by this permit.

Also, WET tests for 2023 failed due to the noted issues at the plant for the review period. WETT for 2024 was conducted just prior to this inspection and results have not yet been received by the facility. The SBRs were operational at the time of the 2024 WET test, however the facility is still having issues getting the SBRs to function consistently. If a retest is required, inspectors recommend that the permittee request an extension for the retest until the SBR units treatment efficiency has stabilized.

6. The Records/Reports evaluation generated a marginal rating. Some reporting errors were noted on the DMRs reviewed. A correct accounting of exceedances can be found under the Effluent Limits Compliance portion of this report. Often, the errors were over-reporting of exceedances related to E.coli. Please note the details below:
  - A. The permit states that when ten (10) or more samples are taken and analyzed for E. coli in a calendar month, not more than ten percent (10%) of those samples may exceed two hundred thirty-five (235) cfu or mpn as a daily maximum. When calculating ten percent, the result must not be rounded up. In reporting for compliance purposes on the

Discharge Monitoring Report (DMR) form, the permittee shall record the highest non-excluded value for the daily maximum.

- B. For E. coli at the CSO Wetland, the daily maximum shall be the geometric mean of all grab samples on any discharge day, provided that 3 or more grab samples are collected. If less than 3 grab samples are taken, then the arithmetic mean shall be reported. The E. coli monthly average shall be the geometric mean of all grab samples collected during the month, provided that 5 or more grab samples are collected. The goal of the effluent monitoring program is to collect at least 3 grab samples during each discharge event, and the samples shall be collected at shorter intervals at the onset of the event, if the permittee estimates that the event duration may be less than 6 hours. If there are discharges on four (4) or more days, then the monthly average shall be reported on the Discharge Monitoring Report (DMR). For discharges of four (4) or more days during a calendar month, then the monthly average E. coli value shall be calculated as a geometric mean of all grab samples collected and reported on the DMR. For months with less than four days of discharge from the wetland, the monthly average does not apply to exceedances.

7. The Pretreatment evaluation generated a marginal rating. The City has updated the surcharge rates in the SUO, however may also need to consider adding limitations to the SUO to be protective of the POTW. Data reviewed from May and June 2024 (since the SBRs have been back online) indicate that organic loadings on the SBR side of the plant are sometimes above design loadings outlined in Construction Permit Approval No. 18417 dated December 20, 2006.
8. 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
May	2023	001	Ammonia Nitrogen	3
May	2023	010	E. coli	4
June	2023	001	Ammonia Nitrogen	10
June	2023	010	E. coli	2
July	2023	001	Ammonia Nitrogen	10
July	2023	001	Phosphorus	1
July	2023	001	E. coli	10
July	2023	010	E. coli	1
August	2023	001	Ammonia Nitrogen	12
August	2023	001	E. coli	21
September	2023	001	Ammonia Nitrogen	10
September	2023	001	E. coli	22
October	2023	001	Ammonia Nitrogen	10
October	2023	001	E. coli	5
November	2023	001	Ammonia Nitrogen	12

December	2023	001	Ammonia Nitrogen	10
January	2024	001	TSS	1
January	2024	001	Ammonia Nitrogen	12
February	2024	001	Ammonia Nitrogen	10
March	2024	001	Ammonia Nitrogen	7
April	2024	001	TSS	3
April	2024	001	Ammonia Nitrogen	10
April	2024	001	E. coli	5
April	2024	010	E. coli	9

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 Holly Zurcher at 317-954-8028 or by email to [hzurcher@idem.IN.gov](mailto:hzurcher@idem.IN.gov). Thank you for your attention to this matter.

Sincerely,



Kim Rohr, Chief  
Wastewater Inspection Section  
Office of Water Quality

Enclosure

Cc: Leigh Voss, IDEM NPDES Permits



# NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0025658</b>		Facility Type: Municipality		Facility Classification: Major		TEMPO AI ID III	
Date(s) of Inspection: June 18, 2024							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: <b>Washington Wastewater Treatment Plant</b> 169 South 200 West Washington IN 47501				Receiving Waters: Hawkins Creek		Permit Expiration Date: 6/30/2028	
County: Daviess						Design Flow: 4.2MGD	
On Site Representative(s):							
First Name	Last Name	Title	Email	Phone			
Dirk	Rhoads	Operator	dirk.rhoads@washingtontin.us	812-254-2792			
Matt	Hooten	Laboratory					
Steve	Truelove	Assistant Superintendent					
Was a verbal summary of findings presented to the on-site representative? <b>Yes</b>							
Certified Operator: Dirk Rhoads	Number: 21839	Class: III	Effective Date: 7-1-24	Expiration Date: 6-30-27	Email: dirk.rhoads@washingtontin.us		
Cyber Security Contact:							
Name:				Email:			
Responsible Official: The Honorable David Rhoads, Mayor 200 Harned Avenue Washington, Indiana 47501				Permittee: City of Washington Email: drhoads@washingtontin.us 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	U	Facility/Site	M	Self-Monitoring	S	Enforcement
S	Effluent	U	Operation	S	Flow Measurement	M	Pretreatment
S	Permit	U	Maintenance	S	Laboratory	U	Effluent Limits Compliance
M	Collection System	S	Sludge Disposal	M	Records/Reports	N	Other:
<b>DETAILED AREA EVALUATIONS</b>							
<b>Receiving Waters:</b>							
<u>S</u> 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.							
<b>Effluent:</b>							
<u>S</u> 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam. Comments: The effluent from Outfall 001 was clear and free of color at the time of the inspection.							
<b>Permit:</b>							

- 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.

The facility consists of two treatment trains with two secondary treatment processes:

1. The Oxidation Ditch (old plant) treatment train consists of screening, a grit chamber, a pump station, pre-aeration, primary clarification, roughing filters, an aeration basin, secondary clarification, \*ultraviolet light disinfection and post aeration;
2. The Sequential Batch Reactor (SBR) train consists of screening, SBRs \*ultraviolet light disinfection and post aeration. This SBR train treats wastewater from the Perdue Poultry Processing facility and a small amount of sanitary waste from the northwest corner of the City.

\*Both effluent treatment trains combine prior to UV disinfection and post aeration before discharging via Outfall 001. Biosolids are handled with aerobic digesters, a centrifuge, and drying beds.

The collection system is comprised of combined sanitary and storm sewers with three CSOs and one wet weather treatment facility (WWTF) outfall.

**Collection System:**

- S 1. CSO's were found to be adequately monitored and maintained.
- N 2. There were two maintenance-related (clogged or blocked lines) overflow events in last 12 months.
- N 3. There were one hydraulic (I&I) overflow events in last 12 months.
- S 4. Facility has met SSO and dry weather CSO reporting requirements
- S 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 evaluation generated a marginal rating. Attachment A of the permit states that discharges from any portion of the sewer collection system, except flow from the Wastewater Treatment Plant (WWTP) via Outfall 001 or the Wet Weather Treatment Facility via Outfall 010, are prohibited. Based on the monthly CSO data, it appears that the facility experienced five prohibited CSO events from May 2023 through April 2024. It is noted that the WWTP was not able to maximize flow through the main plant due to the noted issues in Operations. This likely contributed to some of the prohibited CSOs. Also, the influent structure ahead of the CSO EQ basin and CSO 003 appears to be undersized for extreme wet weather events. CSOs from 003 could occur during extreme events even with flows being diverted to the CSO EQ and maximizing the WWTP based on the magnitude of flow coming into the structure. This information will be forwarded to your CSO project manager in conjunction with review of your level of control. There is no need to respond to this portion of the inspection at this time.

Part II. B. 2 of the permit prohibits overflows, pursuant to 327 IAC 5-2-8(11). A records review indicates that three SSO events occurred from May 2023 through April 2024.

Lift station maintenance appeared mostly adequate, however documentation of inspections, cleaning, and maintenance should be improved.

**Facility/Site:**

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

Comments:

Facility/Site was rated unsatisfactory for the alarm system on the SBRs not functioning with the facility's SCADA system. The weekend prior to this inspection, the facility lost power to the blower to one side of the SBRs. This power loss did not trigger alarms on the facility's SCADA system. The SBR had no aeration for the weekend and turned septic (see photo). Part II. B. 1. b. of the permit requires that the facility be operated in a manner which will minimize discharges of excessive pollutants. Part II. B. 5 of the permit requires the permittee to either provide an alternative power source or control the discharge in order to maintain compliance with the effluent limitations and prohibitions of the permit.

The facility and some remote stations have standby generators that are tested on a regular basis. Portable generators are available for the remaining lift stations. The WWTP and wet weather operations are equipped with SCADA monitoring and all lift stations are equipped with audible and visual alarms.

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**Operation:**

- U 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.
- M 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.
- U 4. The facility was found to be operated efficiently during wet weather events.

**Comments:**

Operation was rated as unsatisfactory for the review period due to the SBRs being offline, however it is noted that the SBRs were back online by the time this inspection was conducted. The SBRs being offline contributed to numerous effluent limit exceedances and did not allow for maximization at the WWTP in wet weather to alleviate CSOs. It is noted that staff appeared to be operating the functioning portion of the plant as best as possible during that period. 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.

The SBRs are now online, but having some operational problems. One SBR was septic at the time of the inspection due to a blower going down over the weekend. Staff are investigating wasting problems with the SBRs as well.

At the CSO Wetland, operations may also need to be adjusted. Details of the wetland can be found under Construction Permit Approval No. L-0350, dated May 20, 2010. The wetland has a slow leak at the discharge due to a gate being left open. Staff should review the design specifications for the wetland and adjust operations to operate the wetland as-designed. This information will be relayed to the CSO Section for further review.

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**Maintenance:**

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

**Comments:**

Maintenance was rated as unsatisfactory for the review period since the SBRs were not operational until May 2024, though it is noted that the SBRs were back online by the time this inspection was conducted. Various other issues were noted:

- A. Wasting pumps from the SBRs are not fully operational.
- B. The grit line is plugged on the "old plant" and needs to be cleaned to provide grit removal.
- C. Some UV banks are out of service at the WWTP and half of the UV units are out of service at the CSO Wetland.
- D. One primary clarifier was out of service due to a broken T-valve.
- E. There is a constant slow leak of flow from the CSO Wetland that needs to be addressed.
- F. The liner in the final wetland pond is still ripped.
- G. The CSO EQ tank needs to be fully drained between storm events and cleaned of solids.



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, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

Staff have started a basic maintenance records binder, though a more formal PM plan should be developed.

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**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 sludge centrifuge is ran 2 to 3 times each week is hauled to the Daviess County Landfill.

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**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.

M 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.

M 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were found to be met.

Comments:

The Self Monitoring Program was rated as marginal. Most sampling practices are conducted accurately and at the frequency required by the permit. However, intermediate sampling is only being conducted 5 times each week. Part I. B. 2. of the permit states that the raw influent and the wastewater from intermediate unit treatment processes, as well as the final effluent shall be sampled and analyzed for the pollutants and operational parameters specified by the applicable Monthly Report of Operation Form, as appropriate, in accordance with 327 IAC 5-2-13. Except where the permit specifically states otherwise, the sample frequency for the raw influent and intermediate unit treatment process shall be at a minimum the same frequency as that for the final effluent. The measurement frequencies specified in each of the tables in Part I.A. are the minimum frequencies required by this permit.

Also, WET tests for 2023 failed due to the noted issues at the plant for the review period. WETT for 2024 was conducted just prior to this inspection and results have not yet been received by the facility. The SBRs were operational at the time of the 2024 WET test, however the facility is still having issues getting the SBRs to function consistently. If a retest is required, inspectors recommend that the permittee request an extension for the retest until the SBR units treatment efficiency has stabilized.

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**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 meters for the WWTP, CSO Wetland, and all CSOs were last calibrated in September and November 2023.

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**Laboratory:**

The following laboratory records were reviewed:

CBOD Bench Sheets	TSS Bench Sheets	Ammonia Bench Sheets
Phos. Bench Sheets	Total N. Bench Sheets	pH Bench Sheets
D. O. Bench Sheets	E. coli Bench Sheets	Flow Proportion Data

- S 1. The laboratory practices and protocol reviewed were adequate, including:
- A written laboratory QA/QC manual was available.
  - Samples were found to be properly stored.
  - Approved analytical methods were found to be used.
  - Calibration and maintenance of instruments was found to be adequate.
  - QA/QC procedures were found to be adequate.
  - Dates of analyses (and times where required) were recorded.
  - 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.

Comments:

The bench sheets reviewed during the inspection appeared to be accurate and complete.

**Records/Reports:**

The following records/reports were reviewed:

DMRs for the period of May 2023 to April 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:

- "No Ex" column was accurate.
- Signatory requirements were met.
- 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. Some reporting errors were noted on the DMRs reviewed. A correct accounting of exceedances can be found under the Effluent Limits Compliance portion of this report. Often, the errors were over-reporting of exceedances related to E.coli. Please note the details below:

- The permit states that when ten (10) or more samples are taken and analyzed for E. coli in a calendar month, not more than ten percent (10%) of those samples may exceed two hundred thirty-five (235) cfu or mpn as a daily maximum. When calculating ten percent, the result must not be rounded up. In reporting for compliance purposes on the Discharge Monitoring Report (DMR) form, the permittee shall record the highest non-excluded value for the daily maximum.
- For E. coli at the CSO Wetland, the daily maximum shall be the geometric mean of all grab samples on any discharge day, provided that 3 or more grab samples are collected. If less than 3 grab samples are taken, then the arithmetic mean shall be reported. The E. coli monthly average shall be the geometric mean of all grab samples collected during the month, provided that 5 or more grab samples are collected. The goal of the effluent monitoring program is to collect at least 3 grab samples during each discharge event, and the samples shall be collected at shorter intervals at the onset of the event, if the permittee estimates that the event duration may be less than 6 hours. If there are discharges on four (4) or more days, then the monthly average shall be reported on the Discharge Monitoring Report (DMR). For discharges of four (4) or more days during a calendar month, then the monthly average E. coli value shall be calculated as a geometric mean of all grab samples collected and reported on the DMR. For months with less than four days of discharge from the wetland, the monthly average does not apply to exceedances.

**Enforcement:**

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

**2008-18062-W**  
**Allie Gates**

Comments:

The facility is current with all milestones in Agreed Order 2008-18062-W, related to the LTCP. The LTCP is fully implemented, but due to a failed Level of Control (LOC) review, the facility was required to develop a Compliance Plan. The work associated with the Compliance Plan was completed in 2019. However, the facility was still not meeting the approved LOC in October 2021. IDEM has granted additional time to get the SBR portion of the plant fixed before requiring additional work related to the LTCP.

The facility is in an ongoing Administrative Order on Consent (AOC) through EPA for the SBR portion of the plant being out of service for an extended period of time, causing numerous effluent limit exceedances. This AOC is being monitored by EPA. The last compliance update submitted to EPA by the facility was dated April 26, 2024.

**Pretreatment:**

- M 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).
- S 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 a marginal rating. The City has updated the surcharge rates in the SUO, however may also need to consider adding limitations to the SUO to be protective of the POTW. Data reviewed from May and June 2024 (since the SBRs have been back online) indicate that organic loadings on the SBR side of the plant are sometimes above design loadings outlined in Construction Permit Approval No. 18417 dated December 20, 2006.

The facility inspects and samples the industrial users as required in Part III of the permit. The facility samples and documents loads for both haulers allowed to dump waste at the plant.

**Effluent Limits Compliance:**

- Yes 1. Were DMRs reviewed as part of the inspection?  
DMRs for the period of May 2023 to April 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
May	2023	001	Ammonia Nitrogen	3
May	2023	010	E. coli	4
June	2023	001	Ammonia Nitrogen	10
June	2023	010	E. coli	2
July	2023	001	Ammonia Nitrogen	10
July	2023	001	Phosphorus	1
July	2023	001	E. coli	10
July	2023	010	E. coli	1
August	2023	001	Ammonia Nitrogen	12
August	2023	001	E. coli	21
September	2023	001	Ammonia Nitrogen	10
September	2023	001	E. coli	22
October	2023	001	Ammonia Nitrogen	10
October	2023	001	E. coli	5
November	2023	001	Ammonia Nitrogen	12
December	2023	001	Ammonia Nitrogen	10
January	2024	001	TSS	1
January	2024	001	Ammonia Nitrogen	12
February	2024	001	Ammonia Nitrogen	10

March	2024	001	Ammonia Nitrogen	7
April	2024	001	TSS	3
April	2024	001	Ammonia Nitrogen	10
April	2024	001	E. coli	5
April	2024	010	E. coli	9

Comments:

**IDEM REPRESENTATIVE**

Inspector Name: Holly Zurcher	Email: hzurcher@idem.IN.gov	Phone Number: 317-954-8028
Other staff participating in the inspection:		
Name(s) Jeremy Ferguson	Phone Number(s)	

**IDEM MANAGER REVIEW**

IDEM Manager: Kim Rohr	Date: 6/21/2024
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## Inspection Photographs



Facility: <b>Washington Wastewater Treatment Plant</b>		Location/Description: Septic SBR from lack of air over weekend.
Photographer: Holly Zurcher		
Date: 6/18/2024	Time:	
Others Present:		



Facility: <b>Washington Wastewater Treatment Plant</b>		Location/Description: Solids accumulation in CSO EQ tank. Tank also needs to be fully drained between storm events to provide storage capacity.
Photographer: Holly Zurcher		
Date: 6/18/2024	Time:	
Others Present:		