



## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Brian Rockensuess**  
*Commissioner*

June 25, 2024

Via Email to: [cyoder@shipshewana.gov](mailto:cyoder@shipshewana.gov)  
Ms. Christine Yoder, Town Council President  
Town of Shipshewana  
P.O. Box 486  
Shipshewana, Indiana 46565

Dear Ms. Yoder:

**Re: Inspection Summary/ Noncompliance Letter**  
Shipshewana Wastewater Treatment Plant  
NPDES Permit No. IN0040622  
Shipshewana, LaGrange County

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

Date(s) of Inspection: June 24, 2024  
Type of Inspection: Compliance Evaluation Inspection  
Inspection Results: Violations were observed.

The following concerns were noted:

The Collection System area was rated as unsatisfactory due to the facility having excessive grease noted in the collection system and lift stations. 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. This includes sewer lines, manholes, and lift stations. **This violation was also brought to the council's attention in a December 1, 2021 Sanitary Sewer Survey inspection.** The following items were noted during this inspection:

- A. A manhole located at Maple and Summey Streets was inspected. This location captures the flow from the downtown area which contains one of the Town's main restaurant's. The sewer line in the manhole had approximately 2" of solidified grease along its sides and bottom. Grease balls (as noted at the treatment plant) were visible as part of the grease mat contained in the line. This grease will sluff off during times of regular flow, but would significantly increase during high flow periods that occur often in the popular tourist Town or wet weather flows. This manhole is located approximately 1 to 2 blocks from the restaurant. The condition noted in this sewer line did not happen over a course of a few months, but rather a long term problem. See attached photograph.
- B. The lift station at 5 and 20 was also inspected. This station's wet well was nearly completely covered in a very thick grease mat. See attached photograph.

The grease noted in the collection will make its way to the treatment plant and if not managed be discharged to the receiving stream. **Please note, the wastewater treatment plant is not designed to treat/remove grease.**

The excessive grease and lack of adequate implementation of your Fats, Oils, and Grease program was noted in a December 3, 2021 Noncompliance Letter. In the Town's response to that letter, you stated that the areas identified as having excessive grease build up during the 2021 inspection would be cleaned. It appears that a continued cleaning schedule was not implemented. The response also stated that the Town would improve the implementation of the following for their FOG program (verbatim in red):

- Review and update data base of current users that are subject to the FOG program based on the current Town ordinance.
- Data base shall note 1-if a Grease Trap is provided, 2-What type of grease trap is provide, and 3-Does grease trap meet current ordinance requirements (size, access, cleaning program)
- Update database to show with inspection dates from Town staff.
- Update database to show if grease buildup is observed directly downstream of user.
- Review ordinance with staff, legal counsel and engineer and develop a notification program and letter to users who are not in compliance.
- Town will also distribute a yearly letter and reminder to all users on the FOG program and other good practices and requirements of the Sewer Use Ordinance.

The current condition of the areas of the collection system/lift station evaluated for this inspection indicates the above has not been done. In addition, new treatment plant staff report they have looked at some local grease traps but when staff asked a restaurant for its cleaning documentation, none was provided. Town management must provide staff the means and support to enforce the SUO. Please note 327 IAC 5-22-10 requires the owner or governing body of a wastewater treatment plant to be responsible for providing **adequate funding and oversight** to ensure the proper operation, maintenance,

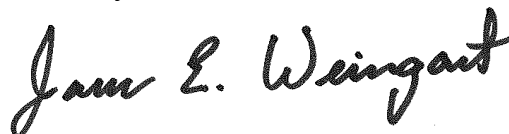
management and supervision of said plant. This would include the entire collection system.

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 Lynn Stackhouse at 317-691-0099 or by email to [lstack@idem.IN.gov](mailto:lstack@idem.IN.gov). Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "James E. Weingart". The signature is written in a cursive, flowing style.

James E. Weingart, Director  
Northern Regional Office

Enclosure



# NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0040622</b>		Facility Type: Municipality		Facility Classification: Minor		TEMPO AI ID I-SP	
Date(s) of Inspection: June 24, 2024							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: <b>Shipshewana Wastewater Treatment Plant</b> 2755 North 735 West Shipshewana IN 46565				Receiving Waters: unnamed tributary to Page Ditch		Permit Expiration Date: 10/31/2026	
County: LaGrange						Design Flow: 0.375MGD MGD	
On Site Representative(s):							
First Name	Last Name	Title	Email	Phone			
Jake	Snyder	Superintendent	jsnyder@shipshewana.gov	260-336-8014			
Brandon	Rarick	Operator	brarick@shipshewana.gov				
Was a verbal summary of findings presented to the on-site representative? <b>Yes</b>							
Certified Operator: Jacob Snyder	Number: 21652	Class: III	Effective Date: 7-1-24	Expiration Date: 6-30-27	Email: jsnyder@shipshewana.gov		
Cyber Security Contact:							
Name:		Email:					
Responsible Official: Ms. Christine Yoder, Town Council President P.O. Box 486 Shipshewana, Indiana 46565				Permittee: Town of Shipshewana			
				Email: cyoder@shipshewana.gov			
				Phone:		Contacted?	
				Fax:		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	S	Facility/Site	S	Self-Monitoring	N	Enforcement
S	Effluent	M	Operation	S	Flow Measurement	N	Pretreatment
S	Permit	S	Maintenance	S	Laboratory	M	Effluent Limits Compliance
U	Collection System	S	Sludge Disposal	S	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 viewed at the outfall and was free of notable foam, algae or solids.							
<b>Effluent:</b>							
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.							
<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.

**Collection System:**

- N 1. CSO's were found to be adequately monitored and maintained.
- M 2. There were one 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.
- U 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.
- U 7. Collection system maintenance activities appeared to be adequate.

Comments:

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said plant. This would include the entire collection system.

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**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 consists of influent flow equalization, influent rotary auger screening, a two individual oxidation ditches, secondary clarifier, tertiary clarifier, UV disinfection, and post aeration. The smaller oxidation ditch/clarifier was out of service for inspection/repairs and to evaluate the unit for an upcoming plant improvement project. All other units of treatment were in service. The on site generator runs under load weekly.

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**Operation:**

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

**Comments:**

Operations was rated as marginal due to grease balls in the plant (see Collection System for additional comments). With the exception of grease balls on both the secondary and tertiary clarifiers surface, the plant was running well. Very good color and mixing was noted in the oxidation ditch with no foaming. Both clarifiers were settling well. Plant operators report they struggle with grease, but all grease was contained behind the clarifier weirs and not noted in the receiving stream. IDEM commends plant operators for continued cleaning/skimming of clarifiers.

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**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 plant appears to be well maintained. The Town utilizes the Silversmith Asset Management program for all maintenance tracking. The program creates and emails work orders and tracks all completed preventative maintenance. All units of treatment, along with all lift stations, are logged into the management system. Nearly all plant staff are newer to the job (7 months or less) and still becoming familiar with this program.

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**Sludge Disposal:**

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

**Comments:**

Sludge is wasted three times weekly to the aerobic digester. Sludge is then thickened and dried on drying beds. A polymer is fed as the beds are being filled to aid in the drying process. All wasting, supernating, and hauling off site of solids is documented on operator logs and/or the MRO.

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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.
- 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:

All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. The composite sample is a manual three part sample and each aliquot/flow rate is well documented. All sampling dates, times, and person are well documented for both composite and grab sampling.

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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 influent and effluent flow meters were last calibrated on March 29, 2024 by Franke Environmental.

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**Laboratory:**

The following laboratory records were reviewed:

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

N 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.

Comments:

The bench sheets reviewed during the inspection appeared to be accurate and complete. The facility implements Quality Control/Quality Assurance testing with each batch of samples analyzed and it includes duplicates, blanks, and standards. All temperature, daily calibrations, and times are very well documented. The pH meter is three point calibrated at each use and the calibration standards were well within expiration. The facility does not always meet the 0.2 mg/L maximum depletion for CBOD blanks but plans to try to make their CBOD water in a slightly different manner to try to consistently meet this criteria.

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**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.

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 requested records were available and appeared to be complete. The records were reviewed both on site and electronically in NetDMR.

**Enforcement:**

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

Comments:

The facility is not in enforcement.

**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 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 permitted industrial contributors and does not accept hauled waste.

**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 marginal 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	Phosphorus	1
September	2023	001	Phosphorus	1

Comments:

**IDEM REPRESENTATIVE**

Inspector Name:

Lynn Stackhouse

Email:

lstack@idem.IN.gov

Phone Number:

317-691-0099

**IDEM MANAGER REVIEW**

IDEM Manager:

James E. Weingart

Date:

6/25/2024



# Inspection Photographs



Facility: <b>Shipshewana Wastewater Treatment Plant</b>
Photographer: Lynn Stackhouse
Date: 6/24/2024      Time:
Others Present:
Location/Description: Manhole/sewer line at Maple and Summey Streets



Facility: <b>Shipshewana Wastewater Treatment Plant</b>
Photographer: Lynn Stackhouse
Date: 6/24/2024      Time:
Others Present:
Location/Description: 5 and 20 lift station wet well



Facility: <b>Shipshewana Wastewater Treatment Plant</b>
Photographer: Lynn Stackhouse
Date: 6/24/2024      Time:
Others Present:
Location/Description: Tertiary clarifier - note grease balls



Facility: <b>Shipshewana Wastewater Treatment Plant</b>
Photographer: Lynn Stackhouse
Date: 6/24/2024      Time:
Others Present:
Location/Description: Tertiary clarifier - note grease balls