



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 27, 2024

Via Email to: john.whicker@blufftonindiana.gov
The Honorable John Whicker, Mayor
City of Bluffton
128 E. Market St.
Bluffton, Indiana 46714

Dear Mayor Whicker:

Re: Inspection Summary Letter
City of Bluffton WWTP
NPDES Permit No. IN0022411
Bluffton, Wells 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 24, 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: <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.

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 Jeremy Waite at 317-691-1914 or by email to jwaite@idem.IN.gov.

Sincerely,

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0022411		Facility Type: Municipality		Facility Classification: Major		TEMPO AI ID III	
Date(s) of Inspection: June 24, 2024							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: City of Bluffton WWTP 702 N. Main St. Bluffton IN 46714				Receiving Waters: Wabash River		Permit Expiration Date: 11/30/2025	
County: Wells				Design Flow: 6.0MGD			
On Site Representative(s): First Name Last Name Title Email Phone Tony Fey Plant Dept. Manager tony.fey@blufftonindiana.gov (260)273-1036							
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator: Tony Fey		Number: 21073	Class: IV	Effective Date: 7-1-21	Expiration Date: 6-30-24	Email: tony.fey@blufftonindiana.gov	
Cyber Security Contact: Name: _____ Email: _____							
Responsible Official: The Honorable John Whicker, Mayor 128 E. Market St. Bluffton, Indiana 46714				Permittee: City of Bluffton Email: john.whicker@blufftonindiana.gov Phone: _____ Fax: _____		Contacted? No	
INSPECTION FINDINGS							
<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 checked="" type="radio"/> Potential problems were discovered or observed. (3) <input 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)							
AREAS EVALUATED DURING INSPECTION							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
S	Receiving Waters	S	Facility/Site	M	Self-Monitoring	N	Enforcement
S	Effluent	S	Operation	S	Flow Measurement	S	Pretreatment
S	Permit	S	Maintenance	M	Laboratory	S	Effluent Limits Compliance
S	Collection System	S	Sludge Disposal	S	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:

S 1. CSO's were found to be adequately monitored and maintained.

S 2. There were zero maintenance-related (clogged or blocked lines) overflow events in last 12 months.

S 3. There were zero 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 collection system is comprised of combined sanitary and storm sewers with a wet weather treatment facility outfall. The wet weather treatment facility is monitored as permitted. The collection system includes sixteen lift stations, which three were evaluated during inspection. All the lift stations maintenance activities appeared to be adequate at the time of the inspection. All checks, repairs, and preventative maintenance are logged and kept in a monthly binder. All lift stations are monitored by a SCADA system that contacts personnel when problems occur. The facility has budgeted to have lining done yearly and 1 lift station rehab each year.

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 are well maintained and access to the units of treatment, wet weather facility, and to both the main and wet weather outfalls was adequate. The facility has an onsite generator that automatically exercises for its readiness during power outages. The units of treatment at the sewage plant are all monitored by a SCADA monitoring system that contacts facility personnel when problems occur. The facility is in the middle of a new plant installation and maintains proper safety measures in construction areas.

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 operating efficiently at the time of inspection. There was good mixing and color noted in the aeration tank. The secondary clarifier was clear and free of solids and appeared to be operating efficiently. The facility had the UV system in operation at the time of inspection. Sludge wasting appeared to be adequate and is determined by the certified operator. The facility is in the process of building a new plant, and part of the construction was the removal of plant 1. The facility is operating on plant 2 until the finalization of the new plant in 12-18 months.

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 records for the treatment facility were reviewed during the inspection. Maintenance program is well implemented and executed. Maintenance activities, such as cleaning, repairs and preventative maintenance, are documented on operator's daily log and logged into computer, and all activities appear adequate.

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. In the month of February 2024, the facility hauled 2156.63 wet tons to National Serv-All Landfill.

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.

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.

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

Comments:

The Self-Monitoring Program was rated as marginal due to the facility needing to improve effluent composite sampling procedures. The facility utilizes an auto sampler for composite sampling, but was only obtaining a 100 ml sample every two hours instead of every hour. The facility needs update the sampler to every hour. As well as, the sampler did not have a certified thermometer to correctly monitor samples are be held at the correct temperature. The facility must have a certified thermometer in the auto sampler to document samples are being held at the correct holding temperature. It was also noted that in June 2023, the facility failed to sample Total Nitrogen. The facility's permit states that the facility must report Total Nitrogen one time per month.

Flow Measurement:

S 1. Flow was found to be properly monitored as required by the permit.

S 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.

N 3. The stream flow gauging station is calibrated as often as necessary to provide accurate and reliable data, but at least once every 12 months.

N 4. A copy of the stream flow calibration curve or table is submitted to IDEM (OWQ Compliance Data Section) no later than October 1 of each year.

Comments:

The facility's flow measurement program, including all documentation, was found to be adequate and representative. The effluent flow meter was last calibrated 4/30/2024 and influent flow meter was last calibrated 6/4/2024. Both meters were calibrated by Integrity Control and Automation LLC.

Laboratory:

The following laboratory records were reviewed:

D. O. Bench Sheets	Chlorine Bench Sheets	CBOD Bench Sheets
TSS Bench Sheets	Ammonia Bench Sheets	pH Bench Sheets
Phos. Bench Sheets	E. coli Bench Sheets	

- M 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.

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

Contract Lab Information

HML	Muncie
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Comments:

The Laboratory evaluation was rated as marginal for the following minor deficiencies:

- When analyzing TSS, the results must be documented on the bench sheet, and a duplicate must be analyzed with each batch. Technicians must ensure that all filters are washed prior to use.
- When analyzing CBOD, the initial DO of all samples must be below 9 mg/L and a duplicate must be analyzed with each batch. Finally, all final effluent samples should be seeded, and if using more than 200 mL of sample, additional nutrients must be added directly to the BOD bottle.
- E. coli samples must be incubated at least 24 hours.
- When analyzing TRC for the wet weather facility, personnel must record date, time, and initials for analysis performed.

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.

- All facility records for the period including the previous three years were available for review.
- 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.
- Bypass and Noncompliance reporting were found to be adequate.

Comments:

The requested records were available and appeared to be complete and accurate.

Enforcement:

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

Comments:

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

Pretreatment:

- No evidence of interference from industrial or other sources of toxic substances was noted.
- For both Delegated and Non-Delegated pretreatment programs:
 - Industrial or commercial dischargers were found to be regulated as required.
 - The permittee was found to enforce the Sewer Use Ordinance (SUO) and the Enforcement Response Plan (ERP).
- If the non-delegated permittee accepts hauled waste:
 - Does the POTW provide written permission to haulers?
 - Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
 - Does the POTW retain records of each load?

Comments:

All required pretreatment records were complete and available for review.

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:

No violations were noted on DMRs reviewed for this inspection.

IDEM REPRESENTATIVE

Inspector Name:

Jeremy Waite

Email:

jwaite@idem.IN.gov

Phone Number:

317-691-1914

Other staff participating in the inspection:

Name(s)

Becky Ruark

Phone Number(s)

(317)691-1909

IDEM MANAGER REVIEW

IDEM Manager:

Kim Rohr

Date:

6/27/2024

Inspection Photographs



Facility: City of Bluffton WWTP
Photographer: Jeremy Waite
Date: 6/24/2024 Time:
Others Present: Becky Ruark
Location/Description: Outfall