



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 28, 2024

Via Email to: scameron@kokomocountryclub.com
Mr. Sean Cameron, General Manager
Kokomo Country Club
P.O. Box 2886
Kokomo, Indiana 46904

Dear Mr. Cameron:

Re: Inspection Summary/ Noncompliance Letter
Kokomo Country Club
NPDES Permit No. IN0062189
Kokomo, Howard 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 27, 2024
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Enforcement evaluation generated an unsatisfactory rating. At the time of the inspection, it was determined you did not meet the reporting requirements for the Compliance Plan in association with your existing Agreed Order. Specifically, the DMRs and MMRs for the months of July 2023 through September 2023 have not been submitted. In addition, a reviewed of the monthly reports submitted, noted eight out of the nine reports were submitted late. Pursuant to Part I.C. 2 of the Permit, the permittee shall submit monitoring reports to the Indiana Department of Environmental Management (IDEM) containing results obtained during the previous month and shall be submitted no later than the 28th day of the month following each completed monitoring period. The facility must submit the late reports as soon as possible.

Those concerns will be forwarded to the OWQ Enforcement Section for consideration in conjunction with your Agreed Order, Case No. 2019-26127-W and will not require an immediate response. You will be notified of any required action and any questions can be directed to your Enforcement Case Manager.

The concerns noted below are not addressed in your Agreed Order and will require a response as detailed in the closing paragraph.

2. The Self Monitoring Program was rated as unsatisfactory for not monitoring final effluent at the frequency required by the permit. This is a violation of Part I. A. 1 of the permit which sets forth the effluent monitoring frequencies applicable to the discharge from Outfall 001. It was noted during the inspection, the facility did not sample and analyze the effluent for Oil & Grease, CBOD, TSS, and Ammonia in July 2023 and August 2023. In addition, the facility did not provide proof of sampling pH and Total Residue Chlorine in 2023. The facility must monitor the effluent at the frequency required in the permit when discharging. The facility needs to create a Standard Operating Procedure (SOP) for how, when, what, and where to sample the discharge when discharging to receiving stream.

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 Aaron Deeter at 317-691-1915 or by email to adeeter@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Handwritten signature of Kim Rohr in black ink.

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure

Permit:

- S 1. Did the facility have a copy of the current permit available for reference.
- N 2. If the permit expires within 180 days, has a renewal application been submitted?
- S 3. Receiving waters are accurately described in the permit.
- 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 discharge description and receiving stream is accurate.

Facility/Site:

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

Comments:

The facility grounds are well maintained and access to the entire facility was adequate.

Operation:

- N 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including an anticipated bypass report for steps of treatment taken out of service.
- N 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.
- N 3. Solids handling procedures were adequate.
- N 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

The facility has no treatment system to operate, so the operation section of the report was not rated. The facility only discharges backwash water from their pool filter as needed and determined by the pool operator.

Maintenance:

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

Comments:

The facility has no treatment system to maintain, so the maintenance section of the report was not rated.

Sludge:

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

Comments:

The facility does not produce any type of sludge, screenings, or slurries, so the sludge section of the report was not rated.

Self-Monitoring:

- N 1. Samples were found to be taken at pre-designated locations and were found to be representative.
- N 2. Flow-proportioned samples were found to be obtained where needed.
- U 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.
- N 4. Sample collection procedures, including automatic sampling, include:
 - a. Samples refrigerated during compositing.
 - b. Proper preservation techniques used.
 - c. Containers and holding times conform to 40 CFR 136.3.
- N 5. Sample documentation was adequate and includes:
 - 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 Total Toxic Organic (TTO) requirements were being met.
- N 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

The Self Monitoring Program was rated as unsatisfactory for not monitoring final effluent at the frequency required by the permit. This is a violation of Part I. A. 1 of the permit which sets forth the effluent monitoring frequencies applicable to the discharge from Outfall 001. It was noted during the inspection, the facility did not sample and analyze the effluent for Oil & Grease, CBOD, TSS, and Ammonia in July 2023 and August 2023. In addition, the facility did not provide proof of sampling pH and Total Residue Chlorine in 2023. The facility must monitor the effluent at the frequency required in the permit when discharging. The facility needs to create a Standard Operating Procedure (SOP) for how, when, what, and where to sample the discharge when discharging to receiving stream.

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.

Comments:

The facility's flow measurement program, including all documentation, is adequate and representative. The facility measures the water level in the pool before backwashing and after backwashing the pool to determine the amount of discharge to the receiving stream. The facility has a chart that converts inches of pool water to million gallons for reporting on monthly reports.

Laboratory:**Comments:**

The facility has no recent laboratory reports to review, so the laboratory section of the report was not rated.

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.

- N 1. All facility records for the period including the previous three years were available for review.
- N 2. DMRs and MMRs were 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 are adequate.

Comments:

The Records/Reports evaluation generated an unsatisfactory rating. Part I.C. 2 of the Permit, The permittee shall submit monitoring reports to the Indiana Department of Environmental Management (IDEM) containing results obtained during the previous month and shall be submitted no later than the 28th day of the month following each completed monitoring period. Specifically, the DMRs and MMRs for the months of July 2023 through September 2023 have not been submitted. In addition, a reviewed of the monthly reports submitted, noted eight out of the nine reports were submitted late. The facility must submit the late reports as soon as possible. This violation is addressed in the facility agreed order case No. 2019-26127-W.

Enforcement:

- U 1. Agreed Order compliance milestones have been met.

2019-26127-W

Ryan Julian, RJulian@IDEM.in.gov, 317-234-3123

Comments:

The Enforcement evaluation generated an unsatisfactory rating. At the time of the inspection, it was determined you did not meet the reporting requirements for the Compliance Plan in association with your existing Agreed Order. Specifically, the DMRs and MMRs for the months of July 2023 through September 2023 have not been submitted. In addition, a reviewed of the monthly reports submitted, noted eight out of the nine reports were submitted late. Pursuant to Part I.C. 2 of the Permit, the permittee shall submit monitoring reports to the Indiana Department of Environmental Management (IDEM) containing results obtained during the previous month and shall be submitted no later than the 28th day of the month following each completed monitoring period. The facility must submit the late reports as soon as possible.

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.

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

Comments:

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

IDEM REPRESENTATIVE

Inspector Name:
Aaron Deeter

Email:
adeeter@idem.IN.gov

Phone Number:
317-691-1915

Other staff participating in the inspection:

Name(s)
Ryan Julian-IDEM

Phone Number(s)
317-234-3123

IDEM MANAGER REVIEW

IDEM Manager:

Kim Rohr

Date:

6/28/2024