



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 25, 2024

VIA ELECTRONIC MAIL

The Honorable Todd Jones, Mayor
City of Elwood
1505 South B Street
Elwood, Indiana 46036

Dear Mayor Jones:

Re: Combined Sewer Overflow Program
Audit Summary
City of Elwood
NPDES Permit No. IN0032719
Madison County

On April 30, 2024, staff from the Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) conducted an audit of both the approved Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) and approved CSO Operational Plan (CSOOP) implementation for the City of Elwood. Our appreciation goes out to Alice Smith and Cecil Whitaker for participating in the CSO audit.

The City of Elwood LTCP was approved in the NPDES Permit No. IN0032719, issued January 1, 2012. The approved LTCP includes an 18-year schedule to implement projects designed to result in no more than 9 untreated CSO events in a typical year. The audit indicated that Elwood is in compliance with implementing the approved LTCP schedule.

The following observations were made during the audit:

- There was no current construction relating to the implementation of the LTCP taking place. Monitoring was being conducted and flow meter locations were recently updated to get more accurate information.
- CSO signage was present at all CSO outfalls, however, some of the signage was hard to read. Those signs with faded text must be updated and documentation of the updates provided to IDEM within 45 days from the date of this letter.
- Backflow prevention was noted as a concern at multiple CSO outfalls where the receiving stream would travel back into the pipe. Elwood must evaluate the need for updated or new backflow prevention at all CSO outfalls, and update or add controls as necessary.



The Elwood CSOOP was approved in 2013. Given that the current CSOOP was unable to be located during the audit, as well as a lack of a recent CSOOP update, the audit indicated that Elwood was not in compliance with implementing the approved plan. The following observations were made during the audit:

- Elwood's implementation of each of the nine minimum controls identified in EPA's National CSO Policy shall be documented in its approved CSO Operational Plan (CSOOP). Given that the CSOOP was last updated in 2013, Elwood must update the document, as necessary, to reflect changes in its operation or maintenance practices; changes to measures taken to implement the nine minimum controls; and to reflect changes to the treatment plant or collection system, including changes in collection system flow characteristics, collection system or WWTP capacity or discharge characteristics (including volume, duration, frequency and pollutant concentration). All updates to the CSOOP must be submitted to IDEM, Office of Water Quality, Municipal NPDES Permits Section for approval. The CSOOP update(s) shall include a summary of the proposed revisions to the CSOOP as well as a reference to the page(s) that have been modified. CSOOP updates shall not result in a lower amount of flow being sent to and through the plant for treatment. The CSOOP update must be submitted to IDEM within 180 days from the date of this letter
- When observing the regulator structures in manholes for the CSOs, several weir heights appeared shallow. IDEM recommends evaluating the possibility of raising the weir height where possible to increase collection system storage and prevent any unnecessary CSO discharges. These potential modifications should be analyzed to ensure they will not cause other problems, such as street or basement flooding. Also, the regulator structures should be maintained and cleaned so that debris wouldn't be an issue that is causing any overflow events. It was noted that many regulator structures had debris that could cause issues in the event of a large rainfall. IDEM recommends including updated regular maintenance and cleaning schedules in the CSOOP update.
- It was noted that debris was also in the lift stations. IDEM recommends including updated regular maintenance and cleaning schedules in the CSOOP update.

Please respond to the observations identified above within the timeframes listed. Please direct any questions regarding this letter to Nicholas Eilerman at 317/232-8619 or by e-mail at neilerma@idem.in.gov.

Sincerely,



Leigh Voss, Chief
Municipal NPDES Permits Section
Office of Water Quality

The Honorable Todd Jones, Mayor
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cc: Josh Ginder, Wastewater Treatment Plant Operator
Cecil Whitaker, Whitaker Engineering
Andy Schmidt, IDEM Wastewater Inspector