



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 C. Rockensuess
Commissioner

March 15, 2024

VIA ELECTRONIC MAIL

The Honorable Gina Leichty, Mayor
City of Goshen
1000 West Wilden Avenue
Goshen, Indiana 46528

Dear Mayor Leichty:

Re: Combined Sewer Overflow Program
Long Term Control Plan
Level of Control Review
City of Goshen
NPDES Permit No. IN0025755
Elkhart County

The City of Goshen has completed all projects included in their approved Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) implementation schedule. The Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) has conducted a review of data included on the CSO Monthly Report of Operation (MRO) forms submitted by Goshen to determine compliance with the approved LTCP level of control, which is no untreated CSO discharge below the ten-year, one-hour design storm, or an equivalent event. The timeframe included in our review was from July 2018 through September 2023.

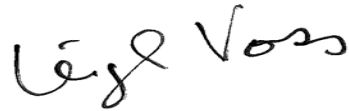
Four CSO events occurred during the review period. In a February 6, 2024, letter, IDEM determined that three of the CSO events (September 2019, October 2021, and February 2022) were due to precipitation which exceeded the design capacity of Goshen's CSO controls. However, IDEM stated in the letter that even though the fourth CSO event (June 25th - 26th 2021) appeared to have occurred due to a precipitation event which included an intense 15-minute downfall, the CSO MRO showed that the wastewater treatment plant (WWTP) did not reach the peak hourly flow capacity of 12.5 MGD until after the CSO event concluded. Therefore, IDEM requested that Goshen submit a written response providing additional clarification regarding why the WWTP did not reach the peak hourly flow capacity during the June 2021 CSO event. Goshen provided their response in a February 28, 2024, letter claiming a metering error led to an incorrect data point on the CSO MRO. Goshen's correspondence included a graph which documented the WWTP did achieve a 12.5 MGD peak at the time of CSO discharge. No further information is requested for this CSO event.

The Honorable Gina Leichty, Mayor
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Please note that CSO LTCP level of control reviews by IDEM will be ongoing and future compliance determinations will be conducted based on future data.

Please contact Dave Tennis at 317/234-9558 or by email at dtennis@idem.in.gov if you have questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Leigh Voss". The signature is written in a cursive style with a large, stylized "L" and "V".

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

cc: Jim Kerezman, Wastewater Superintendent
Sarah Burns, IDEM Wastewater Inspector



Jim Kerezman, Superintendent
WASTEWATER UTILITY, CITY OF GOSHEN
1000 West Wilden Avenue • Goshen, IN 46528-2532

Phone (574) 534-4003 • Fax (574) 534-4350 • TDD (574) 534-3185
wastewater@goshencity.com • www.goshenindiana.org

February 28, 2024

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

Re: Combined Sewer Overflow Program Long Term Control Plan Level of Control Review Response Letter. NPDES Permit No. IN0025755 – Elkhart County

Dear Ms. Voss,

After analyzing the SCADA data, it was found that air entrapped in the influent flow meter line led to inaccurate readings. The attached graph shows the final effluent meter did exceed the required 12.5 mgd as per our Long Term Control Plan on June 25 and June 26, 2021. Under normal operations, we recycle 0.8 – 1.0 million gallons back to the headworks building, affecting influent meter readings. Despite replacing both influent and effluent flow meters in April 2021, air still occasionally causes faults in the influent meter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Kerezman".

Jim Kerezman
Wastewater Superintendent
jimkerezman@goshencity.com
574.534.4003

Cc: Dave Tennis, IDEM CSO Project Manager
Sarah Burns, IDEM Wastewater Inspector
Gina Leichty, Mayor
Dustin Sailor, Director of Public Works and Utilities

Raw Influent & Final Effluent

