



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

July 03, 2024

Via Email to: orleansclerk@townoforleans.org
Mr. John Noblitt, Town Council President
Town of Orleans
161 East Price St
Orleans, Indiana 47452

Dear Mr. Noblitt:

Re: Inspection Summary/ Noncompliance Letter
Orleans Wastewater Treatment Plant
NPDES Permit No. IN0021601
Orleans, Orange 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: July 02, 2024
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Enforcement evaluation generated a marginal rating. The facility is behind projected milestone dates in the approved compliance plan (CP) due to plant and personnel issues that occurred earlier this year. An updated CP should be sent to the Enforcement Section with new milestone dates for remaining tasks.
2. The Permit category generated a marginal rating. The facility was found to have a valid permit. The facility description is mostly accurate, however fails to detail the grit removal unit and some other minor errors. This discrepancy should be addressed upon the next NPDES permit renewal.
3. The Collection System was rated as marginal due to considerable inflow and infiltration (I/I) in the collection system. Part II. B. 1. of the permit requires the facility to have an ongoing preventative maintenance program for the sanitary sewer system. Also, documentation of lift station inspections should be improved.

4. Operation was rated as a marginal. The certified operator's license expired on June 30, 2024. The operator must submit for renewal as soon as possible to rectify this issue.
5. Maintenance was rated as unsatisfactory. The following issues were noted:
 - A. The trickling filter arm is sticking and not consistently turning to spread the influent evenly over the media.
 - B. The grit removal system was out of service.
 - C. A floor drain in the sludge building appears to be clogged and may limit how many solids can be processed.
 - D. The non-potable water system is out of service.
 - E. The facility has not developed a formal preventative maintenance plan.

This is a violation of Part II. B. 1 of the permit which requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

6. The Laboratory evaluation generated a marginal rating. Bench sheets prior to June 2024 were often missing all required information listed in Part I. B. 6 of the NPDES permit which requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit. The facility has switched to the Waterly electronic program for laboratory records. Based on the new electronic program, it appears that all required data will now be captured.

However, it is noted that the three required DO samples have pre-filled times. These fields should not be pre-filled, but should contain actual times that the samples were obtained/analyzed.

Also, a duplicate should be ran routinely for CBOD.

7. The Pretreatment evaluation generated a marginal rating. The facility accepts septic waste from one septic hauler. Each load is documented, however no samples are collected. Part II. C. 14. of the permit states, in the event that the permittee allows the introduction of trucked or hauled pollutants, the permittee shall:
 - A. Obtain and retain, for a minimum of forty-eight hours, samples that are representative of the hauled or trucked pollutants;
 - B. Analyze the samples obtained pursuant to item "a" above in the event that the permittee believes or has reason to believe that the hauled or trucked pollutants may be causing and/or contributing to pass-through and/or interference;
 - C. Maintain records, for each discharge of trucked or hauled pollutants

into the treatment works.

Sampling of septic loads must be improved.

8. The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
October	2023	001	Ammonia Nitrogen	1
November	2023	001	Ammonia Nitrogen	2
December	2023	001	E. coli	2
January	2024	001	Ammonia Nitrogen	8
January	2024	001	E. coli	10
February	2024	001	Ammonia Nitrogen	5
February	2024	001	E. coli	4

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.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your Agreed Order, Case No. 2022-28745-W. Please direct any response to this letter and any questions to Holly Zurcher at 317-954-8028 or by email to hzurcher@idem.IN.gov. A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records.

Sincerely,



Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure

Cc: Jessica Irvine, Water Enforcement



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0021601		Facility Type: Municipality		Facility Classification: Minor		TEMPO AI ID II																	
Date(s) of Inspection: July 02, 2024																							
Type of Inspection: Compliance Evaluation Inspection																							
Name and Location of Facility Inspected: Orleans Wastewater Treatment Plant 1018 South Maple Street Orleans IN 47452				Receiving Waters: Sinkhole to Lost River		Permit Expiration Date: 12/31/2027																	
County: Orange				Design Flow: 0.22MGD																			
On Site Representative(s): <table style="width: 100%; border: none;"> <tr> <td style="width: 15%;">First Name</td> <td style="width: 15%;">Last Name</td> <td style="width: 20%;">Title</td> <td style="width: 30%;">Email</td> <td style="width: 15%;">Phone</td> <td colspan="3"></td> </tr> <tr> <td>Chris</td> <td>Nelson</td> <td>Operations</td> <td>orleanswwtp2@gmail.com</td> <td>812-865-2539</td> <td colspan="3"></td> </tr> </table>								First Name	Last Name	Title	Email	Phone				Chris	Nelson	Operations	orleanswwtp2@gmail.com	812-865-2539			
First Name	Last Name	Title	Email	Phone																			
Chris	Nelson	Operations	orleanswwtp2@gmail.com	812-865-2539																			
Was a verbal summary of findings presented to the on-site representative? Yes																							
Certified Operator: Scott Schutte		Number: 15183	Class: IV	Effective Date: 7-1-21	Expiration Date: 6-30-24	Email: scott@schuttecompliance.com																	
Cyber Security Contact: Name: _____ Email: _____																							
Responsible Official: Mr. John Noblitt, Town Council President 161 East Price St Orleans, Indiana 47452				Permittee: Town of Orleans Email: orleansclerk@townoforleans.org 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 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)																							
AREAS EVALUATED DURING INSPECTION																							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>																							
N	Receiving Waters	S	Facility/Site	S	Self-Monitoring	M	Enforcement																
S	Effluent	M	Operation	S	Flow Measurement	M	Pretreatment																
M	Permit	U	Maintenance	M	Laboratory	U	Effluent Limits Compliance																
M	Collection System	S	Sludge Disposal	S	Records/Reports	N	Other:																
DETAILED AREA EVALUATIONS																							
Receiving Waters:																							
N 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.																							
Comments: Receiving water could not be evaluated since the facility discharges into a sinkhole that eventually discharges underground to the Lost River.																							
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?																							

- M 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 Permit category generated a marginal rating. The facility was found to have a valid permit. The facility description is mostly accurate, however fails to detail the grit removal unit and some other minor errors. This discrepancy should be addressed upon the next NPDES permit renewal.

The facility consists of an influent flow meter, a screw conveyor mechanical screen, grit removal, two primary clarifiers, a bio-roughing tank, an oxidation ditch, two final clarifiers, ultraviolet light disinfection, post aeration, a sludge thickener, digesters, and a geo-textile bagging system.

Collection System:

- N 1. CSO's were found to be adequately monitored and maintained.
- S 2. There were no reported 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.
- M 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.
- M 7. Collection system maintenance activities appeared to be adequate.

Comments:

The Collection System was rated as marginal due to considerable inflow and infiltration (I/I) in the collection system. Part II. B. 1. of the permit requires the facility to have an ongoing preventative maintenance program for the sanitary sewer system. Also, documentation of lift station inspections should be improved.

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 WWTP has a standby generator that is tested on a regular basis. The Town also has a portable generator for the lift stations. The WWTP and lift stations are equipped with SCADA alarms.

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.
- M 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:

Operation was rated as a marginal. The certified operator's license expired on June 30, 2024. The operator must submit for renewal as soon as possible to rectify this issue.

The certified operator for the facility changed in January 2024 due to termination of the previous operator. Since March 2024, operations have improved and units of treatment appeared to be operated efficiently. Staff are performing routine wasting and documenting operational and process control checks on daily sheets. Staff make adjustments in wet weather to help retain solids.

Maintenance:

M 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.

U 2. Facility maintenance activities appeared to be adequate.

Comments:

Maintenance was rated as unsatisfactory. The following issues were noted:

- A. The trickling filter arm is sticking and not consistently turning to spread the influent evenly over the media.
- B. The grit removal system was out of service.
- C. A floor drain in the sludge building appears to be clogged and may limit how many solids can be processed.
- D. The non-potable water system is out of service.
- E. The facility has not developed a formal preventative maintenance plan.

This is a violation of Part II. B. 1 of the permit which requires all waste collection, control, treatment, and disposal facilities to be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants, with adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

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. Bagged sludge is hauled as needed by Rumpke to the Clark-Floyd 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.

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:

The Self Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. The facility conducts a timed-composite, as allowed for in the permit.

It is noted that the sampler needs a separate thermometer inside of the cabinet for independent temperature verification. Also, some bench sheets prior to June 2024 were missing some required data (as discussed under Laboratory).

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 in March 2024.

Laboratory:

The following laboratory records were reviewed:

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

- M 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.

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

Comments:

The Laboratory evaluation generated a marginal rating. Bench sheets prior to June 2024 were often missing all required information listed in Part I. B. 6 of the NPDES permit which requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit. The facility has switched to the Waterly electronic program for laboratory records. Based on the new electronic program, it appears that all required data will now be captured.

However, it is noted that the three required DO samples have prefilled times. These fields should not be prefilled, but should contain actual times that the samples were obtained/analyzed.

Also, a duplicate should be ran routinely for CBOD.

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.

- 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 and accurate.

Enforcement:

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

2022-28745-W

Tessa Scalzo, TScalzo@IDEM.in.gov, 317-233-5975

Comments:

The Enforcement evaluation generated a marginal rating. The facility is behind projected milestone dates in the approved compliance plan (CP) due to plant and personnel issues that occurred earlier this year. An updated CP should be sent to the Enforcement Section with new milestone dates for remaining tasks.

Pretreatment:

- S 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).
- M 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 Pretreatment evaluation generated a marginal rating. The facility accepts septic waste from one septic hauler. Each load is documented, however no samples are collected. Part II. C. 14. of the permit states, in the event that the permittee allows the introduction of trucked or hauled pollutants, the permittee shall:

- a. Obtain and retain, for a minimum of forty-eight hours, samples that are representative of the hauled or trucked pollutants;
- b. Analyze the samples obtained pursuant to item "a" above in the event that the permittee believes or has reason to believe that the hauled or trucked pollutants may be causing and/or contributing to pass-through and/or interference;
- c. Maintain records, for each discharge of trucked or hauled pollutants into the treatment works.

Sampling of septic loads must be improved.

The facility has no industrial sources.

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.

Yes 2. Were violations noted during the review of DMRs?

The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
October	2023	001	Ammonia Nitrogen	1
November	2023	001	Ammonia Nitrogen	2
December	2023	001	E. coli	2
January	2024	001	Ammonia Nitrogen	8
January	2024	001	E. coli	10
February	2024	001	Ammonia Nitrogen	5
February	2024	001	E. coli	4

Comments:

IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Holly Zurcher

hzurcher@idem.IN.gov

317-954-8028

IDEM MANAGER REVIEW

IDEM Manager:

Date:

Kim Rohr

7/3/2024