



Indiana Department of Environmental Management

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

July 02, 2024

Via Email to: henryvillesewer@gmail.com
Mr. Greg Bradshaw, President
Henryville Membership Sanitation Corporation
PO Box 62
Henryville, Indiana 47126

Dear Mr. Bradshaw:

Re: Inspection Summary Letter
HMSC - Memphis WWTP
NPDES Permit No. IN0061671
Memphis, Clark County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Southeast Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: June 26, 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 Andrew Dryden at 812-530-0429 or by email to adryden@idem.IN.gov.

Sincerely,

Mark A. Amick, Director

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0061671		Facility Type: Municipality		Facility Classification: Minor		TEMPO AI ID	
Date(s) of Inspection: June 26, 2024							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: HMSC - Memphis WWTP 15100 Silver Maple Ct. Memphis IN 47143				Receiving Waters: Silver Creek		Permit Expiration Date: 1/31/2028	
County: Clark						Design Flow: 0.7MGD	
On Site Representative(s):							
First Name	Last Name	Title	Email	Phone			
Brad	Hutchins	Operator	brad.hutchins@yahoo.com	812-987-6881			
Doug	Dunlevy	Operator	dougundlevy@gmail.com	502-817-2355			
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator: Doug Dunlevy	Number: 16967	Class: II	Effective Date: 7-1-22	Expiration Date: 6-30-25	Email: dougundlevy@gmail.com		
Cyber Security Contact:							
Name: NA		Email:					
Responsible Official: Mr. Greg Bradshaw, President PO Box 62 Henryville, Indiana 47126				Permittee: Henryville Membership Sanitation Corporation			
				Email: henryvillesewer@gmail.com			
				Phone:		Contacted?	
				Fax:		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	S	Self-Monitoring	S	Enforcement
S	Effluent	S	Operation	S	Flow Measurement	S	Pretreatment
S	Permit	S	Maintenance	S	Laboratory	S	Effluent Limits Compliance
M	Collection System	S	Sludge Disposal	S	Records/Reports	M	Other: Bypass/Overflow
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 Waters evaluation generated a satisfactory rating. The receiving stream was free of notable foam, algae, and solids.							
Effluent:							
S 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.							
Comments: The Effluent evaluation generated a satisfactory rating. 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 Permit evaluation generated a satisfactory rating. It was noted that the facility has a dehumidifier system to dry and produce class A biosolids; however, the unit is not listed in the facility description. The facility should contact IDEM NPDES Municipal Permit Section regarding the incorporation of the dehumidifier into the facility description.

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.
- S 7. Collection system maintenance activities appeared to be adequate.

Comments:

The Collection System evaluation generated a marginal rating for grease build up in the Villages lift station.

Lift stations are checked approximately once per month. Lift station checks include visual inspections of the wet wells, conditions of FOG rods, panels, and alarms. All lift stations are equipped with SCADA telemetry and backup batteries for the SCADA system. Lift station inspections are recorded using Ziptility. There have been no reported overflows from the collection system in the last 12 months.

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/Site evaluation generated a satisfactory rating. The facility grounds appear to be well maintained. It was noted the facility has a new standby generator that is tested weekly. The entire facility is connected to a SCADA alarm system.

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.
- S 4. The facility was found to be operated efficiently during wet weather events.

Comments:

The Operations evaluation generated a satisfactory rating. All units of treatment appear to be operated efficiently. Sufficient solids are wasted from the treatment system, in a timely manner, to maintain efficiency.

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:

The Maintenance evaluation generated a satisfactory rating. Preventative and reactionary maintenance is recorded in the Ziptility digital platform.

Sludge Disposal:

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

Comments:

The Sludge evaluation generated a satisfactory rating. No sludge has been hauled away in the last 12 months. The sludge produced from the facility is a class A biosolid. The facility is in the process of obtaining a Marketing and Distribution Permit for the biosolids through IDEM's Office of Land Quality.

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 evaluation generated a satisfactory rating. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit.

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 Flow Measurement evaluation generated a satisfactory rating. The facility's flow measurement program, including all documentation, was found to be adequate and representative. The facility's effluent flow meter was last calibrated August 9, 2023 by River City Control.

Laboratory:

The following laboratory records were reviewed:

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

- S 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.

S 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 satisfactory rating. The facility runs blanks and duplicates on all parameters weekly. The bench sheets reviewed during the inspection appeared accurate and complete. It was noted that the facility has reported 0 for some E. coli analyses. The facility uses Quanti-Tray for E. coli with has a minimum detection limit of 1.

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.

S 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:

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

Enforcement:

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

2019-27053-W.

Eunice Okhifo, EOkhifo@IDEM.in.gov, 317-232-8432

Comments:

The facility is current with all milestones in the Agreed Order. The facility is expecting to have the camera system at the septage unloading area to be up and running by July 8, 2024.

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).

S 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 satisfactory rating. The facility accepts hauled waste and requires each load to have a sample submitted for a 48 hour hold. Each hauler is given a unique PIN that will open the gate to the facility which can be used to monitor which haulers have contributed to the system. The facility is in the process of equipping the hauled waste drop-off area with a surveillance camera. The camera is expected to be up and running by July 8, 2024.

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:

Other:

Bypass/Overflow

Comments:

On June 13, 2023, the facility experienced an overflow that resulted in approximately 20,000 gallons sludge

entering Silver Creek. The overflow was the result of an operator error who failed to open and close the appropriate valves during the wasting at the end of the day. The overflow occurred in the evening or early morning. The facility immediately notified IDEM upon discovery of the overflow and performed a spill response. An inspection report was generated regarding the overflow. The operating procedures have been modified to prevent a similar overflow from occurring.

IDEM REPRESENTATIVE

Inspector Name: Andrew Dryden	Email: adryden@idem.IN.gov	Phone Number: 812-530-0429
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IDEM MANAGER REVIEW

IDEM Manager: Mark A. Amick	Date: 7/1/2024
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