

**J. DANIEL BRINKERHOFF**  
**TOWN OF CORUNNA**  
Town Attorney



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OFFICE OF  
WATER QUALITY  
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J. Daniel Brinkerhoff  
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April 28, 2008

Ms. Pam Grams  
Compliance Review Section  
Office of Water Quality – Mail Code 65-42  
Indiana Department of Environmental Management  
100 N. Senate Avenue  
Indianapolis, IN 46204-2251

cc: Cindy Salvan  
Pam Grams  
Don Sauty  
David Lawrence  
Deb Dubenitzky  
Barb in Powell  
Paul Aggenotham

Re: Town of Corunna, NPDES Permit No. IN0047473  
Revised Monthly Report of Operation

This is a follow-up to the correspondence from the Corunna Town Council President (April 16, 2008) concerning revisions to several Discharge Monitoring Reports (DMRs) for the referenced permit. A further review of the Monthly Reports of Operation (MRO) for December 2007 and January and February 2008 was conducted by David Wagner on behalf of the Town because of the issues with the DMRs and an irregularity he observed on the MROs. Unfortunately, he identified a serious error in the January MRO.

Mr. Wagner became suspicious of the accuracy of the reports upon observing that the influent concentration date on the December 2007 was identical to the January 2008 report and this information followed the sudden resignation of Frank Thomas as the operator which resignation was at the end of March. Mr. Wagner requested the laboratory data from the prior operator but no data was able to be provided for the January report. After repeated inquiry, the operator indicated that he must have entered the wrong data and also admitted that he had not sampled for February 2008. Thus, Mr. Wagner reviewed several more documents and discovered the following:

1. Based on paid invoices, Corunna paid Sherry for lab services for samples collected in December 2007 and February 2008, but there was no invoice for January 2008, which indicates no sample in January rather than in February.
2. The dates that samples were received by Sherry (indicated on the invoices) coincide with the dates that results are reported for December 2007 and February 2008 on the respective MROs.
3. The dates on the time reports submitted by the prior operator to Corunna that show when he was in Corunna are consistent for the December 2007 and February 2008 sample dates.
4. The date of the sample results for January 2008 (January 20) is inconsistent with the time report the prior operator submitted to Corunna. The time report indicates he was in Corunna on January 18 and January 22 but not on January 20.

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5. There was no invoice from Sherry Labs for January laboratory analyses and the influent data on the January MRO was the same as the influent data on the December MRO which indicates that the failure to sample was in January rather than February.

Accordingly, a revised MRO for January has been prepared but as of the date of this letter has not been signed by the Town Council President, as soon as Clerk-Treasurer Lynch is able to obtain Mr. Arnett's signature, that report will be sent to you promptly. We can not sample the January influent since this occurred several months ago.

In addition, we just received the DMR and MRO for March (enclosed) and when Mr. Wagner reviewed them for completeness, he noted that the operator had again failed to collect the requisite influent samples for March. Mr. Wagner contacted the former operator and when he asked if the required samples had been collected for March the operator responded that "he had forgot" to collect the samples. The Town Council does not condone this performance and if the operator had not resigned at the end of March he would have been fired.

Through the assistance of Rebecca McMonigle of IDEM, a provisional certification was issued to Justin Stouder to be the Class I Operator for Corunna. Mr. Wagner has thoroughly reviewed the permit requirements, including the specific sampling requirements, with Mr. Stouder and is working closely with him to insure that this problem does not occur again. A quality review of the DMRs and MROs will be implemented to further insure compliance with Corunna's NPDES Permit requirements.

The members of the Town Council, the Clerk-Treasurer and I appreciate the cooperation extended to the Town in the past to address various issues with its wastewater system. Further, we appreciate the courtesy, attention and cooperation that have been extended to Town in connection with the current issues, especially in facilitating the provisional certification for Mr. Stouder.

If you need further information or have any further questions for the Town, please forward them through me.

Sincerely,  
BRINKERHOFF & BRINKERHOFF

J. Daniel Brinkerhoff

JDB/glb  
Enclosure  
cc:

Phillip Arnett, President, Corunna Town Council  
Jay Christian, Town Council Member  
Terry Krider, Town Council Member  
Casandra Lynch, Clerk Treasurer  
Bruno Pigott, IDEM, OWQ Assistant Commissioner  
Paul Higgenbotham, IDEM, Branch Chief, NPDES Permits  
Barbara McDowell, IDEM, Compliance Section Chief  
David Wagner, Millennium Environmental