



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

March 13, 2019

Via Email to: jeff.harter@aes.com
Mr. Jeff Harter, Plant Leader
Indianapolis Power & Light Company Petersburg Generating Station
6925 North State Road 57
Petersburg, Indiana 47567

Dear Mr. Harter:

Re: **Inspection Summary/ Noncompliance Letter**
Indianapolis Power & Light
NPDES Permit No. IN0002887
Petersburg, Pike County

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

Date(s) of Inspection: February 27, 2019
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

1. Flow Measurement was rated as **marginal** for failure to calibrate the flow meter annually. The flow meter was last calibrated in 2017. This is a violation of Part I. A. 1 [1] of the permit which states the effluent flow meter shall be calibrated at least once annually.

Effluent flow meters must be calibrated annually in order to ascertain quality flow readings. If calibration hasn't been scheduled already, it will need to occur as soon as possible.

2. 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 the NPDES Permit:

Month	Year	Outfall	Parameter	Type	Conc./Loading	#
Feb	2018	001	Iron	Daily Maximum	Concentration	1
Feb	2018	001	Iron	Monthly Avg.	Concentration	1
Jun	2018	001	Cadmium	Monthly Avg.	Concentration	1

Nov	2018	001	Copper	Daily Maximum	Concentration	1
Jun	2018	007	Cadmium	Monthly Avg.	Concentration	1
Jun	2018	007	Mercury	Daily Maximum	Concentration	1
Jun	2018	007	Mercury	Monthly Avg.	Concentration	1
Jul	2018	007	Selenium	Daily Maximum	Concentration	1
Jul	2018	007	Selenium	Monthly Avg.	Concentration	1
Jul	2018	007	Boron	Daily Maximum	Concentration	1
Jul	2018	007	Boron	Monthly Avg.	Concentration	1
Aug	2018	007	Mercury	Monthly Avg.	Concentration	1
Aug	2018	007	Selenium	Daily Maximum	Concentration	1
Aug	2018	007	Selenium	Monthly Avg.	Concentration	1
Aug	2018	007	Boron	Daily Maximum	Concentration	1
Aug	2018	007	Boron	Monthly Avg.	Concentration	1
Sep	2018	007	Selenium	Daily Maximum	Concentration	1
Sep	2018	007	Selenium	Monthly Avg.	Concentration	1
Sep	2018	007	Boron	Daily Maximum	Concentration	1
Sep	2018	007	Boron	Monthly Avg.	Concentration	1
Oct	2018	007	Selenium	Daily Maximum	Concentration	1
Oct	2018	007	Selenium	Monthly Avg.	Concentration	1
Oct	2018	007	Boron	Daily Maximum	Concentration	1
Oct	2018	007	Boron	Monthly Avg.	Concentration	1
Nov	2018	007	Boron	Daily Maximum	Concentration	1
Nov	2018	007	Boron	Monthly Avg.	Concentration	1
Sep	2018	101	BOD-5	Daily Maximum	Concentration	1
Oct	2018	101	BOD-5	Daily Maximum	Concentration	1
Oct	2018	101	BOD-5	Monthly Avg.	Concentration	1
Dec	2018	101	BOD-5	Monthly Avg.	Concentration	1
Jan	2019	101	BOD-5	Daily Maximum	Concentration	2
Jan	2019	101	BOD-5	Monthly Avg.	Concentration	1

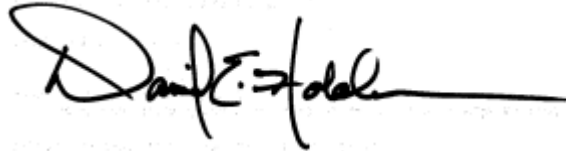
3. Other category was rated **marginal**. Review of the facility Storm Water Pollution Prevention Plan revealed the training log portion of the plan is not being documented. Also, it should be noted that review of the plan must occur annually; and record of said review, with signature of reviewer and date reviewed, must be stored within the plan and available for review during inspection.

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.

Within 30 days of receipt of this letter, a written detailed response documenting

correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in formal enforcement action. Please direct your response to this letter to the attention of Bridget S. Murphy, at our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Heath Dill at 812-582-0696 or by email to hdill@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Holder", with a long horizontal line extending to the right.

David E. Holder, Director
Southwest Regional Office

Enclosure



NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0002887		Facility Type: Industrial		Facility Classification: Major		Facility Classification: D		TEMPO AI ID 12096	
Date(s) of Inspection: February 27, 2019									
Type of Inspection: Compliance Evaluation Inspection									
Name and Location of Facility Inspected: Indianapolis Power & Light 6925 N SR 57 Petersburg IN 47567					County: Pike		Receiving Waters/POTW: Lick Creek and White River		Permit Expiration Date: 9/30/2022
							Design Flow: NA		
On Site Representative(s):									
First Name	Last Name	Title	Email	Phone					
Jeff	Harter	Plant Leader	jeff.harter@aes.com	812-601-7222					
Wil	Teague	Scientist III	wil.teague@aes.com	812-601-7115					
Bobby	Douglas	Wastewater Treatment Team Leader	bobby.douglas@aes.com	812-789-3292					
Nick	Walton	Lab Specialist	nick.walton@aes.com	812-601-7069					
Terry	Barnett	Lab Specialist	terry.barnett@aes.com	812-601-7069					
Was a verbal summary of the inspection given to the on-site rep? Yes									
Certified Operator: Scott W. Schutte	Number: 15184	Class: D	Effective Date: 7-1-18	Expiration Date: 6-30-21	Email: sschutte@crawfordsville-in.gov				
Responsible Official: Mr. Jeff Harter, Plant Leader 6925 North State Road 57 Petersburg, Indiana 47567					Permittee: Indianapolis Power & Light Company Petersburg				
					Email: jeff.harter@aes.com				
					Phone: 812-601-7222		Contacted?		
					Fax:		Yes		
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									
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)									
S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	S	Compliance Schedules		
S	Effluent/Discharge	S	Operation	M	Flow Measurement				
S	Permit	S	Maintenance	S	Laboratory	U	Effluent Limits Compliance		
		S	Sludge	S	Records/Reports	M	Other: SWPPP		
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 stream was free of notable foam, algae or solids.									
Effluent/Discharge:									
S 1. Treated effluent was essentially free of excessive solids, floating debris, oil, scum, or billowy foam.									
N 2. Pretreatment discharge into sanitary sewers appeared free of excessive oils, grease, solids, or foam and did not appear to be in violation of the local Sewer Use Ordinance.									
N 3. Pretreatment discharge into sanitary sewers did not contain materials that pass through or interfere with the operation of the POTW.									

Evaluation of Multiple Outfalls:

Outfall #	Insp. Date	Outfall Inspection Comments
001	2/27/2019	Outfall comes through a culvert from Pond A. Effluent pipe was under water at time of inspection due to high creek level. Receiving stream appeared clear and free of color.
002	2/27/2019	The discharge is subsurface in a canal leading to the White River. The flow was rapid and producing turbulence, but it appeared free of debris and excessive color at the time of inspection.
007	2/27/2019	Effluent was clear and free of color at time of inspection.
101	2/27/2019	This is the discharge from the Sanitary WWTP. The effluent was clear and free of color at the time of inspection.
006S	2/27/2019	This is a stormwater outfall. There was no observable flow at time of inspection. The area was clean and clear of obstructions.
030S	2/27/2019	This is a stormwater outfall. Since last inspection a stairwell was constructed allowing sampling activities to be conducted much more safely.

Comments:

Permit:

- S 1. Did the facility have a copy of the current permit available for reference.
N 2. If the permit expires within 180 days, has a renewal application been submitted?
S 3. Receiving waters are accurately described in the permit.
N 4. The permit has been properly transferred if there is a new owner.

Comments:

The facility has a valid permit.

Facility/Site:

- S 1. The facility was found to have standby power or equivalent provision, If required.
S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility.
S 3. Safe and adequate access was provided for inspection of all treatment units and outfalls.
S 4. Facilities and equipment did not appear beyond their useful life.
5. List any safety concerns noted during the inspection in the box below:

Comments:

The facilities and site are well maintained. There are several aspects to the treatment which occurs at this facility. Overall, all systems appeared to be well maintained and functioning appropriately.

Operation:

- S 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including 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 were adequate.
S 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

All units of treatment appear to be operating efficiently.

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 adequate.

Comments:

Maintenance was rated as satisfactory. Currently an electronic maintenance system called EMPAC is utilized for maintaining preventative maintenance records and distributing work orders. However, the company expressed during the inspection that they will soon be switching over to a new electronic system called SAP.

Sludge:

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

Comments:

A records review during the inspection showed adequate wasting, handling, and disposal of sludge. Manifests and haul tickets were reviewed. FGD pressings (sludge) is taken to either West Creek Mine or Shamrock Mine to be utilized as fill.

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, include:
 - a. Samples refrigerated during compositing.
 - b. Proper preservation techniques used.
 - c. Containers and holding times conform to 40 CFR 136.3.
- S 5. Sample documentation was adequate and includes:
 - 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 Total Toxic Organic (TTO) requirements were being met.
- N 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices 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.
- M 2. Flow data and calibration records were available for review.

Comments:

Flow Measurement was rated as **marginal** for failure to calibrate the flow meter annually. The flow meter was last calibrated in 2017. This is a violation of Part I. A. 1 [1] of the permit which states the effluent flow meter shall be calibrated at least once annually. Effluent flow meters must be calibrated annually in order to ascertain quality flow readings. **If calibration hasn't been scheduled already, it will need to occur as soon as possible.**

Laboratory:

The following laboratory records were reviewed:

TSS Bench Sheets	Chlorine Bench Sheets	pH Bench Sheets
Contract Lab Reports	Chain-of-Custody	Calibration Log

- 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 used.
 - d. Calibration and maintenance of instruments was adequate.
 - e. QA/QC procedures were 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.

Contract Lab Information

Microbac Laboratories	Louisville, KY
	502-962-6400

Comments:

The bench sheets reviewed during the inspection appeared to be accurate and complete.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of February 2018 to January 2019 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 MMRs were completed properly and accurately including:
- "No Ex" column was accurate.
 - Signatory requirements were met.
 - Reports were prepared by or under the direction of a certified operator.
- S 3. Bypass and Noncompliance reporting are adequate.

Comments:

The requested records were available and appear complete and accurate.

Compliance Schedules:

- N 1. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.
- S 2. Agreed Order compliance milestones have been met.

Comments:

There is no Schedule of Compliance in the current permit, and there is no Agreed Order. Agreed Order Case No:2013-21497-W was closed out on May 1, 2018.

Effluent Limits Compliance:

- Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of February 2018 to January 2019 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	Type	Conc./Loading	Number
Feb	2018	001	Iron	Daily Maximum	Concentration	1
Feb	2018	001	Iron	Monthly Avg.	Concentration	1
Jun	2018	001	Cadmium	Monthly Avg.	Concentration	1
Nov	2018	001	Copper	Daily Maximum	Concentration	1
Jun	2018	007	Cadmium	Monthly Avg.	Concentration	1
Jun	2018	007	Mercury	Daily Maximum	Concentration	1
Jun	2018	007	Mercury	Monthly Avg.	Concentration	1
Jul	2018	007	Selenium	Daily Maximum	Concentration	1
Jul	2018	007	Selenium	Monthly Avg.	Concentration	1
Jul	2018	007	Boron	Daily Maximum	Concentration	1
Jul	2018	007	Boron	Monthly Avg.	Concentration	1
Aug	2018	007	Mercury	Monthly Avg.	Concentration	1
Aug	2018	007	Selenium	Daily Maximum	Concentration	1
Aug	2018	007	Selenium	Monthly Avg.	Concentration	1
Aug	2018	007	Boron	Daily Maximum	Concentration	1
Aug	2018	007	Boron	Monthly Avg.	Concentration	1
Sep	2018	007	Selenium	Daily Maximum	Concentration	1
Sep	2018	007	Selenium	Monthly Avg.	Concentration	1
Sep	2018	007	Boron	Daily Maximum	Concentration	1
Sep	2018	007	Boron	Monthly Avg.	Concentration	1
Oct	2018	007	Selenium	Daily Maximum	Concentration	1
Oct	2018	007	Selenium	Monthly Avg.	Concentration	1
Oct	2018	007	Boron	Daily Maximum	Concentration	1
Oct	2018	007	Boron	Monthly Avg.	Concentration	1
Nov	2018	007	Boron	Daily Maximum	Concentration	1
Nov	2018	007	Boron	Monthly Avg.	Concentration	1
Sep	2018	101	BOD-5	Daily Maximum	Concentration	1
Oct	2018	101	BOD-5	Daily Maximum	Concentration	1
Oct	2018	101	BOD-5	Monthly Avg.	Concentration	1
Dec	2018	101	BOD-5	Monthly Avg.	Concentration	1
Jan	2019	101	BOD-5	Daily Maximum	Concentration	2
Jan	2019	101	BOD-5	Monthly Avg.	Concentration	1

Comments:

Other:
SWPPP

Comments:

Review of the facility Storm Water Pollution Prevention Plan revealed the training log portion of the plan is not being documented. Also, it should be noted that review of the plan must occur annually, and record of said review, with signature of reviewer and date reviewed, must be stored within the plan and available for review during inspection.

IDEM REPRESENTATIVE

Inspector Name:

Heath Dill

Email:

hdill@idem.IN.gov

Phone Number:

812-582-0696

Other staff participating in the inspection:

Name(s)

Kaye Driskill (KDriskil@idem.IN.gov)

Phone Number(s)

(317) 407-0079

IDEM MANAGER REVIEW

IDEM Manager:

Bridget S. Murphy

Date:

3/12/2019