From:	HOUSE, JASON
То:	McDaniel, Rose; Austin Babb
Cc:	IDEM Netdmr; Ghiasuddin, Syed; STARKS, GARY; Dittmer, Jerry; Groce, Samantha
Subject:	RE: WETT TRE progress report, Columbia City - Request for extension
Date:	Friday, July 24, 2020 7:53:00 AM
Attachments:	image003.png
	image004.png
	image005.png
	image006.png
	image007.png
	image009.png
Attachments:	image004.png image005.png image006.png

Hello Mr. Babb:

Thank you for your email. IDEM encourages Columbia City to do its best to meet its compliance obligations. The TRE study is a NPDES permit requirement. Failure of WET tests is a serious matter and IDEM does require follow-up to ensure protection of the receiving waterway. Since this is a NPDES permit requirement, an official extension of the final submittal date of the TRE study cannot be granted by IDEM. However, in determining whether enforcement action will be taken by IDEM in this matter, IDEM will consider your submittal of reasoning for a late submittal, in the your email below. IDEM encourages Columbia City to continue its TRE study and submit its final report as timely as possible to the agency. The NPDES permit requires that a TRE study last no more than 3 years from the date of the confirmation of toxicity. The confirmation of toxicity was from a September 2017 toxicity test, therefore, the final report is due in October 2020.

If you have further questions, please feel free to contact me. If you have questions about the TRE study itself, please contact Dr. Ghias (copied on this email).

Thank you.





COVID-19 Resources:

- Indiana State Dept. of Health (ISDH) COVID-19 Call Center: Call 877-826-0011 (available 8:00 am-5:00 pm daily).
- Anthem NurseLine: Call 800-337-4770 or visit the <u>Anthem NurseLine</u> online for a FREE symptom screening. Available to anyone with an Anthem health plan (this includes State of IN employees)
- Anthem Employee Assistance Program (EAP): Available to ALL state employees and adults in household regardless of health plan participation. Call 800-223-7723 or visit <u>anthemeap.com</u> (enter State of Indiana)

for crisis counseling, help finding child/elder care, legal/financial consultation and much more.

From: McDaniel, Rose <RMCDANIE@idem.IN.gov>
Sent: Thursday, July 23, 2020 3:23 PM
To: Austin Babb <ababb@columbiacity.net>
Cc: IDEM Netdmr <Netdmr@idem.IN.gov>; Ghiasuddin, Syed <SGHIASUD@idem.IN.gov>; HOUSE, JASON <JAHOUSE@idem.IN.gov>; STARKS, GARY <GSTARKS@idem.IN.gov>
Subject: Re: WETT TRE progress report, Columbia City - Request for extension

Thank you for that good explanation. I think you provided more information in this email than the TRE report had.

We'll see what Mr. Jason House and Dr. Ghias decide concerning your request for TRE project extension to January 2021. I believe the TRE was to last until this fall, originally.

Have a great afternoon,

Rose S. McDaniel

IDEM OWQ/Compliance Branch Compliance Data Section 100 N Senate Ave Indianapolis, IN 46204

rmcdanie@idem.in.gov

Coping with COVID-19:

• Indiana State Dept. of Health (ISDH) COVID-19 Call Center: Call 877-826-0011 (open 24/7)

• Anthem NurseLine: Call 800-337-4770 or visit the Anthem NurseLine online for a FREE symptom screening. Available to anyone with an Anthem health plan (this includes State of IN employees)

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From: Austin Babb <ababb@columbiacity.net>
Sent: Thursday, July 23, 2020 2:54 PM
To: McDaniel, Rose <<u>RMCDANIE@idem.IN.gov</u>>
Cc: IDEM Netdmr <<u>Netdmr@idem.IN.gov</u>>; Ghiasuddin, Syed <<u>SGHIASUD@idem.IN.gov</u>>; HOUSE,
JASON <<u>JAHOUSE@idem.IN.gov</u>>; STARKS, GARY <<u>GSTARKS@idem.IN.gov</u>>
Subject: RE: WETT TRE progress report, Columbia City - Request for extension

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Hello Ms. McDaniel,

Before the COVID our department had been working with Commonwealth Biomonitoring on general toxicity screening of different sections in our collection system. We had pinpointed the toxic substance as a Quaternary Ammonium Compound (QAC) and the two areas that seemed the highest levels of QAC. The area with highest level of QAC measured includes a large assisted living facility and nursing home as well as residential. Before the COVID I had been in contact with maintenance officials at the two facility's and were working through house cleaning procedures, SDS sheets, and trying to get a quantity of potential waste stream established. All this took place in February and March when the COVID started to flare up and force a change in our schedule.

Since coming back to a full working department June 8th I have reestablished communication with the two facility's mentioned above, checking on any change in practice from previous correspondence. I have contacted Commonwealth Biomonitoring about general toxicity screening the target areas again but cannot get their assistance until the end of August. I plan to sample the system and target areas in August multiple times for the QAC as well as the potential facility's thought to be contributing the toxicity.

With the onset of the COVID our department was on an alternate work schedule from the end of March through June 8th, limiting resources and staff. If at all possible we would like to have until the first of next year to finish our current TRE investigation. We think we are close to finding the origination of the toxicity but are not quite there yet. We appreciate your consideration in this matter.

Thank you,



Austin E. Babb Pretreatment Coordinator City of Columbia City Water Pollution Control Facility 1171 South Line Street Columbia City, IN 46725 Phone (260)248-5119 Fax (260)244-4511 ababb@columbiacity.net

From: McDaniel, Rose [mailto:RMCDANIE@idem.IN.gov]
Sent: Wednesday, July 22, 2020 11:23 AM
To: Austin Babb
Cc: IDEM Netdmr; Ghiasuddin, Syed; HOUSE, JASON; STARKS, GARY
Subject: Re: WETT TRE progress report, Columbia City - Request for extension

Hello Mr. Babb (Austin),

I just checked and it looks like the TRE report due 07/31/2020 was to be the last one for the 36 months of TRE for Columbia City.

Before COVID, do you think you were getting close to determining the toxicity source for Columbia City WWTP? Do you have an idea of how much more time you need? Have you performed any recent WET tests?

Please be sure to submit the TRE report due 07/31/2020 with the results that you know about, so far, and the reason for recent reduced investigation.

I am forwarding this TRE extension request to Dr. Ghias and Mr. Jason House to make a determination for your request for TRE extension. Please respond to all.

Thank you for letting us know.

Rose S. McDaniel

IDEM OWQ/Compliance Branch

Compliance Data Section

100 N Senate Ave

Indianapolis, IN 46204

rmcdanie@idem.in.gov

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From: Austin Babb <ababb@columbiacity.net>
Sent: Wednesday, July 22, 2020 8:55 AM
To: McDaniel, Rose <<u>RMCDANIE@idem.IN.gov</u>>
Subject: RE: WETT TRE progress report, Columbia City - Response

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Hi Ms. McDaniel,

I am working on my next quarterly TRE update, which will not have much in it compared to past reports. Our department has only been back to full time duty since June 8th and I'm still trying to pay catch up on my pretreatment backlog. I am interested in asking for additional time for my TRE investigation and am not clear on what information I need to provide with regard to the email below.

Thank you,



Austin E. Babb Pretreatment Coordinator City of Columbia City Water Pollution Control Facility 1171 South Line Street Columbia City, IN 46725 Phone (260)248-5119 Fax (260)244-4511 ababb@columbiacity.net

From: McDaniel, Rose [mailto:RMCDANIE@idem.IN.gov]
Sent: Monday, April 27, 2020 7:26 AM
To: Austin Babb
Cc: STARKS, GARY; Bye, Julie; Denney, Michelle; Ghiasuddin, Syed; HOUSE, JASON
Subject: Re: WETT TRE progress report, Columbia City - Response

Hello Mr. Babb (Austin),

Thank you for sending this quarterly TRE report for Columbia City WWTP.

We ask that you do your best to continue with the TRE evaluation at this time. If there are specific items you will not be able to meet prior to the next TRE report deadline for Columbia City, you can officially request additional time. To do so you will need to supply IDEM with initial information that meets the criteria in IDEM's guidance, followed by ongoing documentation, at this website:

https://www.in.gov/idem/files/coronavirus_enforcement_discretion.pdf

Have a good day,

Rose S. McDaniel

IDEM OWQ/Compliance Branch

Compliance Data Section

100 N Senate Ave

Indianapolis, IN 46204

rmcdanie@idem.in.gov

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From: IDEM Wastewater Reports <<u>WWReports@idem.IN.gov</u>>
Sent: Thursday, April 23, 2020 7:14 AM
To: Ghiasuddin, Syed <<u>SGHIASUD@idem.IN.gov</u>>
Cc: STARKS, GARY <<u>GSTARKS@idem.IN.gov</u>>; Wheat, Rose <<u>RWHEAT@idem.IN.gov</u>>; Bye, Julie
<<u>JBYE@idem.IN.gov</u>>; McDaniel, Rose <<u>RMCDANIE@idem.IN.gov</u>>; Denney, Michelle
<<u>MiDenney@idem.IN.gov</u>>
Subject: FW: WETT TRE progress report, Columbia City

From: Austin Babb [mailto:ababb@columbiacity.net]
Sent: Wednesday, April 22, 2020 2:06 PM
To: IDEM Wastewater Reports <<u>WWReports@idem.IN.gov</u>>
Cc: COUNTERMAN, REX <<u>RCOUNTER@idem.IN.gov</u>>
Subject: WETT TRE progress report, Columbia City

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To Whom It May Concern,

Here is the latest WETT TRE progress report for Columbia City.

Thank you,



Austin E. Babb Pretreatment Coordinator City of Columbia City Water Pollution Control Facility 1171 South Line Street Columbia City, IN 46725 Phone (260)248-5119 Fax (260)244-4511 ababb@columbiacity.net