



## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
*Governor*

**Bruno Pigott**  
*Commissioner*

July 29, 2020

Via Email to: [townoftrafalgar@gmail.com](mailto:townoftrafalgar@gmail.com)  
Mr. Jeff Eisenmenger, Town Council President  
Town of Trafalgar  
3500 S County Road 225 W  
Trafalgar, Indiana 46181

Dear Mr. Eisenmenger:

**Re: Inspection Summary/ Noncompliance Letter**  
Trafalgar Municipal WWTP  
NPDES Permit No. IN0040681  
Trafalgar, Johnson 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 22, 2020  
Type of Inspection: Compliance Evaluation Inspection  
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Collection System area was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which requires the facility to have an ongoing preventative maintenance program for the sanitary sewer system. The facility ran above 100% design capacity several of the past 12 months.

The facility had one reported overflow during the past 12 months.

2. Lancaster and West Pearl Street lift stations were visited during inspection. Facility/Site was rated as unsatisfactory due to Lancaster lift station appearing to be beyond its useful life with deteriorating concrete walls. 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. It was noted the facility is expected to completely rehabilitate this station in their project. In previous inspections, it was noted that the Stott's lift station is also beyond its useful life.

In addition, the facility has an alarm system on-site for the oxidation ditch, however there is no dialer. Therefore if no one is on-site, no one hears the alarm. This could cause discharge of excessive pollutants if equipment fails.

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 our letterhead address or via email to [wwViolationResponse@idem.IN.gov](mailto:wwViolationResponse@idem.IN.gov). **If the non-compliance issues addressed in this report/letter are attributable to the COVID-19 pandemic, please provide this information in your response to this Office.** Any questions should be directed to Kim Rohr at 317-719-1666 or by email to [krohr@idem.IN.gov](mailto:krohr@idem.IN.gov). Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Groce', with a large, sweeping loop at the end.

Samantha Groce, Chief  
Wastewater Inspection Section  
Office of Water Quality

Enclosure



# NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0040681</b>	Facility Type: Municipality	Facility Classification: Minor	TEMPO AI ID 33012				
Date(s) of Inspection: July 22, 2020							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: <b>Trafalgar Municipal WWTP</b> 3500 S CR 225 W Trafalgar IN 46181		Receiving Waters: East Prong of Stotts Creek	Permit Expiration Date: 7/31/2024 Design Flow: 0.20MGD				
County: Johnson							
On Site Representative(s): First Name Last Name Title Email Phone Eric Clark Operator Spencer Kindred Operator Lee Rodgers Certified Operator trafalgarwwtp@embarqmail.com							
Was a verbal summary of findings presented to the on-site representative?							
Certified Operator: Lee Rodgers	Number: 15935	Class: II	Effective Date: 7-1-19 Expiration Date: 6-30-22 Email:				
Cyber Security Contact:							
Name: Email:							
Responsible Official: Mr. Jeff Eisenmenger, Town Council President 3500 S County Road 225 W Trafalgar, Indiana 46181		Permittee: Town of Trafalgar Email: townoftrafalgar@gmail.com Phone: Fax: Contacted? No					
<b>INSPECTION FINDINGS</b>							
<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)							
<b>AREAS EVALUATED DURING INSPECTION</b> (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
S	Receiving Waters	U	Facility/Site	M	Self-Monitoring	N	Compliance Schedules
S	Effluent	S	Operation	S	Flow Measurement	S	Pretreatment
S	Permit	S	Maintenance	M	Laboratory	M	Effluent Limits Compliance
U	Collection System	S	Sludge	M	Records/Reports	N	Other:
<b>DETAILED AREA EVALUATIONS</b>							
<b>Receiving Waters:</b> 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.							
<b>Effluent:</b> 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.							
<b>Permit:</b> 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.

Comments:

The facility was found to have a valid permit and the facility description, including units of treatment and receiving stream, is accurate.

**Collection System:**

- N 1. CSO's were found to be adequately monitored and maintained.
- M 2. There were 1 maintenance-related (clogged or blocked lines) overflow events in last 12 months.
- S 3. There were 0 hydraulic (I&I) overflow events in last 12 months.
- S 4. Facility has met SSO and dry weather CSO reporting requirements
- S 5. Any adverse impacts from SSO and CSO events have been properly mitigated.
- U 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.
- U 7. Collection system maintenance activities appeared to be adequate.

Comments:

The Collection System area was rated as unsatisfactory due to the facility continuing to have excessive inflow and infiltration (I/I) in the collection system. This is a violation of Part II. B. 1. e of the permit which requires the facility to have an ongoing preventative maintenance program for the sanitary sewer system. The facility ran above 100% design capacity several of the past 12 months.

The facility had one reported overflow during the past 12 months.

**Facility/Site:**

- S 1. The facility was found to have standby power or equivalent provision.
- M 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.
- U 4. Facilities and equipment did not appear beyond their useful life.
5. List any safety concerns:

Comments:

Lancaster and West Pearl Street lift stations were visited during inspection. Facility/Site was rated as unsatisfactory due to Lancaster lift station appearing to be beyond its useful life with deteriorating concrete walls. 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. It was noted the facility is expected to completely rehabilitate this station in their project. In previous inspections, it was noted that the Stott's lift station is also beyond its useful life.

In addition, the facility has an alarm system on-site for the oxidation ditch, however there is no dialer. Therefore if no one is on-site, no one hears the alarm. This could cause discharge of excessive pollutants if equipment fails.

**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:
- Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
  - Adequate documentation of operational activities, including system monitoring and cleaning.
  - Adequate funding to ensure proper operation.
- S 3. Solids handling procedures include:
- Sufficient solids wasted from the treatment system, in a timely manner, to maintain process efficiency.
  - Wasting of solids based on appropriate operational targets and valid process control testing.
  - Adequate documentation of solids removal, handling, or control was available for review.
- N 4. The facility was found to be operated efficiently during wet weather events.

Comments:

All units of treatment appeared 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 to be adequate.

Comments:

Maintenance was rated as satisfactory. Each operator has their own log book where they detail all maintenance activities they perform.

**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.

**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.

M 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.

M 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:

Self monitoring was rated as marginal due to not testing the oxidation ditch at the frequency of the permit. The facility was unaware intermediate testing must be tested at the same frequency of the final effluent and will begin that frequency.

Self monitoring was also rated as marginal due to no thermometer in the auto-sampler. The auto-sampler was reading -0.1 degrees C at time of inspection. The sample was not frozen therefore the internal thermometer is incorrect. A thermometer in water is required for auto-samplers to ensure proper composting temperature.

**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.

Comments:

The effluent flow meter was last calibrated 06/30/20 by BL Anderson.

**Laboratory:**

The following laboratory records were reviewed:

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

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

Comments:

Laboratory was rated as marginal due to no calibration log for pH or DO. Inspector gave facility a pH log sheet to

use. DO calibration can be recorded on the CBOD bench sheet.

Sample volume should be increased for TSS analysis to achieve desired residue of 0.0025 mg/L using as much as 1000 mL if necessary.

CBOD samples must be brought to room temperature prior to analysis. Sample dilutions should be adjusted to hit 2.0 mg/L depletion. If samples do not meet 2.0 mg/L depletion, they should not be included in the average.

#### **Records/Reports:**

The following records/reports were reviewed:

DMRs for the period of June 2019 to May 2020 were reviewed as part of the inspection.

S 1. All facility records for the period including the previous three years were available for review.

M 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:

Records/reports was rated as marginal due to E.coli supplemental data not being recorded. The facility has been using nodi code 9. Inspector provided instructions to properly record.

#### **Compliance Schedules:**

N 1. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

N 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.

#### **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 (SOU) and the Enforcement Response Plan (ERP).

N 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 facility has no industrial sources.

#### **Effluent Limits Compliance:**

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

DMRs for the period of June 2019 to May 2020 were reviewed as part of the inspection.

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

Comments:

The Effluent Limits Compliance area was rated marginal due to self-reported violations of the limits detailed in Part I. A. of the NPDES Permit. Review of DMRs revealed one pH violation.

#### **IDEM REPRESENTATIVE**

Inspector Name:

Kim Rohr

Email:

krohr@idem.IN.gov

Phone Number:

317-719-1666

#### **IDEM MANAGER REVIEW**

IDEM Manager:

Samantha Groce

Date:

7/28/2020