



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

January 21, 2021

Via Email to: Terryamick53@gmail.com
The Honorable Terry Amick, Mayor
City of Scottsburg
2 East McClain Ave.
Scottsburg, Indiana 47170

Dear Mayor Amick:

Re: Inspection Summary/ Noncompliance Letter
Scottsburg WWTP (RM# 94645)
NPDES Permit No. IN0020397
Scottsburg, Scott 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: January 11, 2021
Type of Inspection: Complaint Investigation
Inspection Results: Violations were observed.

The following concerns were noted:

1. Under Agreed Order, No. 2018-24999-W, dated September 19, 2019, the Respondent (City of Scottsburg) shall develop and submit to IDEM for approval a Compliance Plan (CP) which identifies action that Respondent will take to achieve and maintain compliance with its Permit, specifically including the action Respondent will take to:
 - A. Achieve and maintain compliance with effluent limitations contained in the Permit, specifically those listed in Part 1.A of the Permit;
 - B. Develop and implement a preventative maintenance program for the sanitary sewer collection system, which includes methods and milestone dates for locating and eliminating sources of inflow and infiltration (I&I) in the sewer system;
 - C. Comply with reporting requirements of the Permit; and
 - D. Achieve and maintain compliance with Facility Operation, Maintenance, and Quality Control requirements listed in Part II. B of the Permit.

To date, a compliance plan has not been approved.

These concerns will be forwarded to the OWQ Enforcement Section for consideration in conjunction with your Agreed Order, Case No. 2018-24999-W and will not require an immediate response. You will be notified of any required action and any questions can be directed to your Enforcement Case Manager.

The concerns noted below are not addressed in your Agreed Order and will require a response as detailed in the closing paragraph.

2. IDEM received a complaint of a sewer collection system overflow in Scottsburg within the Rosewood Mobile Home Park. Reports of overflows during precipitation events from the manhole located on Rosewalk Drive have been reported to IDEM in the past. The City of Scottsburg WWTP personnel recently sealed the manhole in an attempt to eliminate the overflow point. This action seemed to eliminate the overflows from the manhole; however, it now appears that the system is backing up and overflowing from different sections of laterals located within the collection system.

The Collection System was rated as unsatisfactory. The facility continues experiencing excessive inflow and infiltration (I/I) in the collection system which continues to hydraulically overload sections of the collection system causing backups and overflows. This is a violation of Part II. B. 1 of the permit which requires all facilities to be maintained in good working order at all times and operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. This includes the facility's collection system. This issue was also addressed in an Imposition of Sewer Connection Ban letter from IDEM dated July 23, 2019.

Specifically, the collection system located within Rosewood Mobile Home Park continues to be hydraulically overloaded during precipitation events causing overflows within the MHP. The section of the collection system within the MHP is gravity fed directly into a city main lateral. The main lateral appears to be drastically undersized causing sections of the collection system within the MHP to backup/overflow during precipitation events.

IDEM inspector Ken Stark requests that the facility monitor discharges from all known problematic points located within their collection system, or overflows in private collection systems that are known to be caused by hydraulic overload from the POTW's collection system, by visual inspection within 24 hours of receiving 0.25 inches of precipitation or greater within a 24 hour period as recorded at the nearest National Weather Service Reporting Station. The permittee shall maintain a record of each visual inspection and the reports shall be made available to IDEM and/or US EPA staff upon request.

The City of Scottsburg recently entered into an Agreed Order, Case No. 2018-24999-W. As part of the agreed order with IDEM, the City of Scottsburg committed to building a new Wastewater Treatment Plant (WWTP). As part of the construction plans, the main lift station is scheduled

to be rebuilt, upgrading from two 20 hp. pumps to three 35 hp. pumps.

3. It appears that some overflows from the collection system within Rosewood Mobile Home Park have not been reported. If an overflow within a private collection system occurs due to the city's collection systems inability to accept flow, it must be reported as a sanitary sewer overflow (SSO), regardless of where the SSO occurs.

While all sanitary sewer systems collect a certain amount of storm water and ground water, some collect excessive amounts, so when wet weather conditions occur, capacity is exceeded and they may overflow. These overflow events are called sanitary sewer overflows (SSOs), and they are in violation of federal and state NPDES rules. SSOs also include basement backups when sewage flows from a sanitary sewer back into a private lateral and then into a private residence.

When a system experiences an SSO event, the owner must report that event to the Indiana Department of Environmental Management within 24 hours. These report forms are to be submitted only by an authorized representative of the owner of the sewer or plant that overflowed, and are expected to contain an explanation of what happened and the name and signature of that responsible official. Any time a bypass, overflow, basement backup, or SSO occurs, the responsible official should complete the form and e-mail it to IDEM (wwreports@idem.IN.gov).

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. Any questions should be directed to Kevin Stark at 812-525-9411 or by email to kstark@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,



Mark A. Amick, Director
Southeast Regional Office

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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|---|--------------------------------|-----------------------------------|---|---|------------------|---|----------------------------|
| NPDES Permit Number: IN0020397 | Facility Type: Municipality | Facility Classification: Major | Facility Classification: III | TEMPO AI ID 50038 | | | |
| Date(s) of Inspection: January 11, 2021 | | | | | | | |
| Type of Inspection: Complaint Investigation | | | | | | | |
| Name and Location of Facility Inspected: Scottsburg WWTP (RM# 94645) 490 North Third Street Scottsburg IN 47170 | | County: Scott | Receiving Waters: McClain Ditch to Stuckers Fork of the Muscatatuck River | Permit Expiration Date: 2/28/2021 Design Flow: 1.35MGD | | | |
| On Site Representative(s): First Name Last Name Title Email Phone Chase Hardin Operator chardin@cityofscottsburg.com 812-820-5148 | | | | | | | |
| Was a verbal summary of findings presented to the on-site representative? Yes | | | | | | | |
| Certified Operator: Chase Hardin | Number: 19052 | Class: III | Effective Date: 7-1-19 | Expiration Date: 6-30-22 Email: chardin@cityofscottsburg.com | | | |
| Cyber Security Contact: Name: NA Email: | | | | | | | |
| Responsible Official: The Honorable Terry Amick, Mayor 2 East McClain Ave. Scottsburg, Indiana 47170 | | | Permittee: City of Scottsburg Email: Terryamick53@gmail.com Phone: 812-752-3169 Fax: Contacted? 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 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) | | | | | | | |
| N | Receiving Waters | N | Facility/Site | N | Self-Monitoring | U | Compliance Schedules |
| N | Effluent | N | Operation | N | Flow Measurement | N | Pretreatment |
| S | Permit | N | Maintenance | N | Laboratory | N | Effluent Limits Compliance |
| U | Collection System | N | Sludge | U | Records/Reports | N | Other: |
| DETAILED AREA EVALUATIONS | | | | | | | |
| Permit: | | | | | | | |
| 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: | | | | | | | |
| Comments: IDEM received a complaint of a sewer collection system overflow in Scottsburg within the Rosewood Mobile Home Park. Reports of overflows during precipitation events from the manhole located on Rosewalk Drive have been reported to IDEM in the past. The City of Scottsburg WWTP personnel recently sealed the manhole in an attempt to eliminate the overflow point. This action seemed to eliminate the overflows from the manhole; however, it now appears that the system is backing up and overflowing from different sections of laterals located within the collection system. | | | | | | | |
| The Collection System was rated as unsatisfactory. The facility continues experiencing excessive inflow and | | | | | | | |

infiltration (I/I) in the collection system which continues to hydraulically overload sections of the collection system causing backups and overflows. This is a violation of Part II. B. 1 of the permit which requires all facilities to be maintained in good working order at all times and operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. This includes the facility's collection system. This issue was also addressed in an Imposition of Sewer Connection Ban letter from IDEM dated July 23, 2019.

Specifically, the collection system located within Rosewood Mobile Home Park continues to be hydraulically overloaded during precipitation events causing overflows within the MHP. The section of the collection system within the MHP is gravity fed directly into a city main lateral. The main lateral appears to be drastically undersized causing sections of the collection system within the MHP to backup/overflow during precipitation events.

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Records/Reports:

The following records/reports were reviewed:

Comments:

It appears that some overflows from the collection system within Rosewood Mobile Home Park have not been reported. If an overflow within a private collection system occurs due to the city's collection systems inability to accept flow, it must be reported as a sanitary sewer overflow (SSO), regardless of where the SSO occurs.

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Compliance Schedules:

Comments:

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To date, a Compliance Plan has not been approved.

Effluent Limits Compliance:

No 1. Were DMRs reviewed as part of the inspection?

Comments:

IDEM REPRESENTATIVE

| | | |
|---------------------|--------------------|---------------|
| Inspector Name: | Email: | Phone Number: |
| Kevin Stark | kstark@idem.IN.gov | 812-525-9411 |
| IDEM MANAGER REVIEW | | |
| IDEM Manager: | Date: | |
| Samantha Groce | 1/19/2021 | |