



## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
*Governor*

Bruno Pigott  
*Commissioner*

September 16, 2021

Via Email to: [hprayiii@aol.com](mailto:hprayiii@aol.com)  
Mr. Harry Pray, III, Town Council President  
Town of Westport  
PO Box 579  
Westport, Indiana 47283

Dear Mr. Pray:

Re: **Inspection Summary/ Noncompliance Letter**  
Westport WWTP  
NPDES Permit No. IN0024830  
Westport, Decatur 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: September 13, 2021  
Type of Inspection: Compliance Evaluation Inspection  
Inspection Results: Violations were observed.

The following concerns were noted:

1. The Collection System evaluation generated an **unsatisfactory** rating. Part II. B. 2 of the permit prohibits overflows, pursuant to 327 IAC 5-2-8(11). A records review indicates that 17 hydraulic-related overflows and one maintenance-related overflow occurred during the period of August 2020 to July 2021.

The facility continues to have excessive inflow and infiltration (I/I) in the collection system. The facility's influent remains above 100% capacity almost every month. 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 Town of Westport, with assistance from Commonwealth Engineering, have submitted a PER and funding application to the USDA Rural Development Program for funding consideration on March 30, 2021, to address capacity and SSO issues. Suggested upgrades include;

- Collection System Improvements – Targeted Rehabilitation

- Collection System Improvements - New Wet Weather Lift Station by Manhole 76 and an Additional Force Main
  - WWTP Improvements – Incorporation of a Submerged Attached Growth Reactor (SAGR) System and Miscellaneous Additional and Required WWTP Upgrades
  - SAGR Treatment System
    - Sludge Removal (from Lagoons 1, 2 & 3)
    - Influent Force Main Connection
    - Influent Flow Meter and Structure for new Force Main to plant
    - Chemical Feed System Improvements
    - Lagoon Maintenance Device
    - Mechanical Screen
    - Generator
    - Electrical & Controls (New Equipment)
2. The Laboratory evaluation generated a **marginal** rating. Part I. B. 5 of the permit requires the analytical and sampling methods used to conform to the current version of 40 CFR, Part 136, unless otherwise specified. Specifically, duplicates must be ran for E.coli and ammonia on a monthly basis.
3. 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	#
Jun	2021	001	pH	Daily Maximum	Conc.	3
Oct	2020	001	Dilution Factor	Daily Maximum	Loading	1

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.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your Agreed Order, Case No. 2018-25004-W. Please direct any response to this letter and any questions to Kevin Stark at 812-525-9411 or by email to [kstark@idem.IN.gov](mailto:kstark@idem.IN.gov). A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records.

Sincerely,



Samantha Groce, Chief  
Wastewater Inspection Section

Office of Water Quality

Enclosure

Cc: Amari Farren, Enforcement



# NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0024830</b>	Facility Type: Municipality	Facility Classification: Minor	TEMPO AI ID I-SP
Date(s) of Inspection: September 13, 2021			
Type of Inspection: Compliance Evaluation Inspection			
Name and Location of Facility Inspected: <b>Westport WWTP</b> 501 W. Washington St. Westport IN 47283		Receiving Waters: Millstone Creek	Permit Expiration Date: 3/31/2026 Design Flow: .17MGD
County: Decatur			
On Site Representative(s):			
First Name	Last Name	Title	Email
Mark	Taylor	Superintendent	westportwater@comcast.net
Norman "Jay	Maddux	Operator	westportwater@comcast.net
Phone			
812-614-6312			
812-614-6312			
Was a verbal summary of findings presented to the on-site representative? <b>Yes</b>			
Certified Operator: Mark Taylor	Number: 3746	Class: I	Effective Date: 7-1-20
Expiration Date: 6-30-22		Email: westportwater@comcast.net	
Cyber Security Contact:			
Name: NA		Email:	
Responsible Official: Mr. Harry Pray III, Town Council President PO Box 579 Westport, Indiana 47283		Permittee: Town of Westport Email: hprayiii@aol.com Phone: 812-662-1145 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	S	Facility/Site
N	Effluent	S	Operation
S	Permit	S	Maintenance
U	Collection System	N	Sludge
S		S	Self-Monitoring
M		M	Flow Measurement
U		U	Laboratory
N		N	Records/Reports
			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>			
N 1. Final effluent was free of excessive solids, floating debris, oil, scum, or billowy foam.			
Comments: The facility was not discharging 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:**

- S 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.
- U 3. There were 17 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.
- S 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 evaluation generated an unsatisfactory rating. Part II. B. 2 of the permit prohibits overflows, pursuant to 327 IAC 5-2-8(11). A records review indicates that 17 hydraulic-related overflows and one maintenance-related overflow occurred during the period of August 2020 to July 2021.

The facility continues to have excessive inflow and infiltration (I/I) in the collection system. The facility's influent remains above 100% capacity almost every month. 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 Town of Westport, with assistance from Commonwealth Engineering, have submitted a PER and funding application to the USDA Rural Development Program for funding consideration on March 30, 2021, to address capacity and SSO issues. Suggested upgrades include;

- Collection System Improvements – Targeted Rehabilitation
- Collection System Improvements - New Wet Weather Lift Station by Manhole 76 and an Additional Force Main
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  - Sludge Removal (from Lagoons 1, 2 & 3)
  - Influent Force Main Connection
  - Influent Flow Meter and Structure for new Force Main to plant
  - Chemical Feed System Improvements
  - Lagoon Maintenance Device
  - Mechanical Screen
  - Generator
  - Electrical & Controls (New Equipment)

**Facility/Site:**

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

Comments:

The facility grounds appeared to be well maintained. The lift station is equipped with an auto-dialer alarm system and an on-site generator that is tested weekly. Safe and adequate access was provided for inspection of all treatment units.

**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:

- 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.

N 3. Solids handling procedures include.

- a. Sufficient solids wasted from the treatment system, in a timely manner, to maintain process efficiency.
- b. Wasting of solids based on appropriate operational targets and valid process control testing.
- c. 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. Solids have not been removed from the lagoons since 2011-2012.

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**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 activities are documented on a calendar. The lagoon banks appeared to be adequately maintained with no excessive vegetation present.

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**Sludge:**

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

Comments:

Solids have not been removed from the lagoons since 2011-2012. Per the PER, sludge removal will be addressed in all three lagoons.

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**Self-Monitoring:**

S 1. Samples were found to be taken at pre-designated locations and were found to be representative.

N 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, 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:

The Self Monitoring Program was rated as satisfactory. All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit.

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**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, and document that monitoring equipment has been calibrated at the frequency required in the permit.

M 3. The stream flow gauging station is calibrated as often as necessary to provide accurate and reliable data, but at least once every 12 months.

M 4. A copy of the stream flow calibration curve or table is submitted to IDEM (OWQ Compliance Data Section) no later than October 1 of each year.

Comments:

The influent and effluent flow meters was last calibrated September 16, 2020, by BL Anderson. The stream flow gauging station should be calibrated annually. IDEM representatives have been in communication with the Town to help with the calibration of the stream flow station.

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**Laboratory:**

The following laboratory records were reviewed:

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 written laboratory QA/QC manual was available.
  - Samples were found to be properly stored.
  - Approved analytical methods were found to be used.
  - Calibration and maintenance of instruments was found to be adequate.
  - QA/QC procedures were found to be adequate.
  - Dates of analyses (and times where required) were recorded.
  - Name of person performing analyses was recorded.

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

Comments:

The Laboratory evaluation generated a marginal rating. Part I. B. 5 of the permit requires the analytical and sampling methods used to conform to the current version of 40 CFR, Part 136, unless otherwise specified. Specifically, duplicates must be ran for E.coli and ammonia on a monthly basis.

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**Records/Reports:**

The following records/reports were reviewed:

DMRs for the period of August 2020 to July 2021 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 MROs were found to be 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 were found to be adequate.

Comments:

The requested records were available and appeared to be complete and accurate.

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**Compliance Schedules:**

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

Comments:

The facility is on schedule with all requirements of the Schedule of Compliance in the permit. The facility has completed all of Phase I Milestones, which included collection system evaluation, smoke testing, and removal of immediate impacts to I&I such as downspouts and basement drains. Currently, the facility is mid-way through Phase II Milestones, which include; PER, application submittals, design of wastewater improvements, construction, and compliance demonstration period.

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**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:
- Industrial or commercial dischargers were found to be regulated as required.
  - 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:
- Does the POTW provide written permission to haulers?
  - Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
  - Does the POTW retain records of each load?

Comments:

The facility has no industrial sources. The facility does not accept hauled waste.

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**Effluent Limits Compliance:**

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

DMRs for the period of August 2020 to July 2021 were reviewed as part of the inspection.

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

The Effluent Limits Violations 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
Jun	2021	001	pH	Daily Maximum	Conc.	3
Oct	2020	001	Dilution Factor	Daily Maximum	Loading	1

Comments:

#### IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Kevin Stark

kstark@idem.IN.gov

812-525-9411

#### IDEM MANAGER REVIEW

IDEM Manager:

Date:

Andy Schmidt

9/14/2021