Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

February 26, 2018

Mr. Timothy Woodward
Turkey Creek Regional Sewer District
4852 N CR 1200 W
Cromwell, IN 46732

Dear Mr. Woodward:

Re: Inspection Summary Letter
Turkey Creek Regional Sewer District
PWSID IN5243032

On February 20, 2018, a representative of the Indiana Department of Environmental Management, Office of Water Quality, conducted an inspection of Turkey Creek Regional Sewer District, located at 4852 N CR 1200 W, Cromwell, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:	Sanitary Survey **(See attached)**
Results of Inspection:	Deficiencies were discovered and require a submittal from you and/or follow-up inspection by IDEM **(Deficiencies will be in bold)**

Within 30 days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements noted on the attached survey, must be submitted to this office. Failure to respond adequately to this letter may result in further action by this office. Please direct any response to this letter and any questions to Sophia Andrews at the address on this letterhead or by email at soandrew@idem.IN.gov or by phone at 574-245-4886. I can be reached by email at Lternied@idem.IN.gov or by phone at 317-234-7461. Thank you for your attention to this matter.

Sincerely,

Lucio M. Ternieden, Chief
Field Inspection Section
Drinking Water Branch
Office of Water Quality

cc: Kosciusko County Health Department
File

PUBLIC WATER SYSTEM SANITARY SURVEY REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Date:	Time In:	Time Out:
2/20/2018	10:15 AM	12:00 PM

Inspector Name:	Program Activity Type:
Sophia Andrews	Sanitary Survey

Water System Inventory Information

PWS Name: Turkey Creek Regional Sewer District

PWSID Number: IN5243032

Mailing Address: 4852 N CR 1200 W

City: Cromwell | State: IN | Zip: 46732

Administrative Contact:
Timothy Woodward
4852 N CR 1200 W
Cromwell, IN 46732

Administrative Contact Phone Number: 260-856-4341

Administrative Contact Fax Number: 260-856-2471

Administrative Contact Email: tim@tcrsd.com

Operator in Responsible Charge (OIRC)
Timothy Woodward
4852 N CR 1200 W
Cromwell, IN 46732

OIRC Phone Number: 260-856-4341

OIRC Fax Number: 260-856-2471

OIRC Email: tim@tcrsd.com

OIRC Certification(s)

Certification Number	Expiration Date	License Type
DS875214	2019-06-30	DSM
WT875213	2019-06-30	WT2

Owner Information
Turkey Creek Regional Sewer District
4852 N CR 1200 W
Cromwell, IN 46732

Owner Phone Number: 260-856-4341

Owner Fax Number: 260-856-2471

Owner Email:

Physical Address of System:
4852 N CR 1200 W
Cromwell, IN 46732

Resident Population: 590

Nontransient Population: 0

Transient Population: 0

System Representatives Present During Inspection

First Name	Last Name	Position Title	Phone	Email

Timothy	Woodward	Operator	260-856-4341	tim@tcrsd.com
Deanna	Ortman	Contractor	765-459-4125	dortman@ortmandrilli...

Average Days/Hours of Operation

Days: 7 Hours: 24 ☐ Unknown

Seasonal?

○ Yes ◉ No

Number Of Service Connections: 237

Other Systems Involved:

Average Daily Production: 43000 G.P.D.

Design Plant Capacity: 648,000 G.P.D.

Peak Day Since Last Survey: Unknown

Peak Day: 130,000 G.P.D.

Source Type:

☑ Ground
☐ Surface
☐ Purchased

☐ Water Sold

☐ Water Purchased

☐ Interconnections

Source

Name Number Location:		POE Served:	
Well #1		EP001	
Source Size: 12 Inches	**Source Depth:** 72 Feet ☐ Unknown Source Depth	**Casing Depth:** 61 Feet ☐ Unknown Casing Depth	**Casing Material:** Steel
Date Drilled: 1/1/1963 ☐ Unknown	**Pump Type:** Submersible ☐ VFD	**Pump Capacity:** 200 G.P.M. ☐ Unknown	**Well Type:** Sand & Gravel ☐ Artesian Well

Name Number Location:		POE Served:	
Well #2		EP001	
Source Size: 12 Inches	**Source Depth:** 72 Feet ☐ Unknown Source Depth	**Casing Depth:** 63 Feet ☐ Unknown Casing Depth	**Casing Material:** Steel
Date Drilled: 1/1/1998 ☐ Unknown	**Pump Type:** Submersible ☐ VFD	**Pump Capacity:** 200 G.P.M. ☐ Unknown	**Well Type:** Sand & Gravel ☐ Artesian Well

◉ Yes ○ No ○ N/A Is the source(s) sufficient in quantity?

◉ Yes ○ No ○ N/A Is the source(s) adequate in quality for the primary drinking water standards?

○ Yes ○ No ◉ N/A Is the source(s) adequate in quality for the secondary drinking water standards?

◉ Yes ○ No ○ N/A Is the top of the well protected so that foreign matter or surface water cannot enter the well?

◉ Yes ○ No ○ N/A Is the grouting or concrete pad surrounding the casing at the well head free from cracks or chips, and does it seal tightly to the casing?

◉ Yes ○ No ○ N/A Does the casing extend at least 18 inches above finished grade or at least 36

	inches above the regulatory flood elevation?
○ Yes ○ No ◉ N/A	If a well pit is used, are all entry points tightly sealed?
◉ Yes ○ No ○ N/A	If standby or auxiliary power is available for the source(s), is it in operable condition and well maintained?
◉ Yes ○ No ○ N/A	Is there a flow meter for each well?
◉ Yes ○ No ○ N/A	Is the site protected against flooding?
◉ Yes ○ No ○ N/A	Are there any potential sources of contamination within the sanitary setback area relevant to this system?

Deficiency - 327 IAC 8-2-8.2(e)(1)(B) states in part: For a PWS using ground water, in whole or in part, the following shall be evaluated for deficiencies: Activities or pollution sources in the sanitary setback area or immediate source water area that will cause risks.

Vegetation overgrowth is an issue near the outdoor well. The system is to find a way to control this without the use of chemicals.

◉ Yes ○ No ○ N/A	Is the well vent screened and properly constructed?
○ Yes ◉ No ○ N/A	Are the pressure and check valves, blow off valves, and other well system appurtenances maintained and operating properly?

Deficiency - 327 IAC 8-2-8.2(e)(7)(E)(ii) states in part: Deficiencies relating to system management and operations, including the following: Failure by the PWS to operate and maintain the water system in a manner to ensure providing water that meets all requirements of the Act (Title 42, U.S.C.A. 300F through 300j-26) and IC 13-18-16-6. Measures to meet these requirements must include having and implementing a written or otherwise documented approach for the following: Maintaining a record of system components, including information necessary to: (AA) operate; (BB) maintain; and (CC) repair; system components.

Recommendation: It would be a good idea for the system to erect a barrier (e.g. ballasts, landscaping rock) to help protect the outdoor well from lawn equipment.

◉ Yes ○ No ○ N/A	Does the system own or control the sanitary setback area?
◉ Yes ○ No ○ N/A	Are unused wells properly abandoned within the Well Head Protection Area and and/or sanitary setback area?
○ Yes ◉ No ○ N/A	Is there proper grading around the casing to divert surface water?

Deficiency - 327 IAC 8-2-8.2(e)(1)(G)(i)(AA) states in part: For a PWS using ground water, in whole or in part, the following shall be evaluated for deficiencies: (i) Location or condition of a well making it vulnerable to surface water runoff or flooding, including: (AA) elevation of casing not protected from a one hundred (100) year flood.

There are low areas around the outdoor well that are susceptible to the pooling of water. The system is to fill these in.

◉ Yes ○ No ○ N/A	Is there an adequate raw water sample tap for each source?
◉ Yes ○ No ○ N/A	Are there measures put into place to prevent unauthorized access to intakes or wells?

Treatment - Types

Treatment Types: • Phosphate	Treatment Element Surveyed By: Sophia Andrews
	Treatment Objectives: • Iron Control

◉ Yes ○ No ○ N/A	Is chemical storage adequate?
◉ Yes ○ No ○ N/A	Are chemical feeders and pumps operable, in good condition, and being properly calibrated and maintained?
◉ Yes ○ No ○ N/A	Are instrumentation and controls adequate for the process being utilized and in proper working order?

◉ Yes ○ No ○ N/A	Are treatment processes covered and adequately sealed?
◉ Yes ○ No ○ N/A	Are adequate safety devices available and precautions observed (dust mask, safety goggles, protective clothing)?
◉ Yes ○ No ○ N/A	Is there secondary containment where needed and adequate?
◉ Yes ○ No ○ N/A	Are there provisions to warn operators of treatment failures?
◉ Yes ○ No ○ N/A	If standby or auxiliary power is available for the treatment plant(s), is it in operable condition and well maintained?
◉ Yes ○ No ○ N/A	Is there restricted access to any unauthorized personnel from any portion of the treatment process?
◉ Yes ○ No ○ N/A	Do all the chemical additives used in the treatment process have ANSI/NSF approval?
◉ Yes ○ No ○ N/A	Was the treatment process free from uncontrolled cross connections and are backflow prevention devices installed at all appropriate locations?
○ Yes ○ No ◉ N/A	Do the aerator inlets and exhaust have deflecting shields in place to prevent potential sources of contamination?

Treatment - Disinfection

Disinfection Element(s):	Disinfection Element Surveyed By:
• Post Disinfection • Chlorine Gas	Sophia Andrews

◉ Yes ○ No ○ N/A	Is the disinfection equipment, including UV light, being operated and maintained properly?
◉ Yes ○ No ○ N/A	Are critical spare parts on hand?
○ Yes ◉ No ○ N/A	Is there a "Danger Chlorine" sign on the entrance door to the chlorine room?

10 States Standards 2.18 states in part: Consideration must be given to the safety of water plant personnel and visitors. The design must comply with all applicable safety codes and regulations that may include the Uniform Building Code, Uniform Fire Code, National Fire Protection Association Standards, and state and federal OSHA standards. Items to be considered include noise arresters, noise protection, confined space entry, protective equipment and clothing, gas masks, safety showers and eye washes, handrails and guards, warning signs, smoke detectors, toxic gas detectors and fire extinguishers.

The signage on the chlorine room door, as well as on the wall next to it need to be refreshed or replaced as they are faded and in a state of disrepair.

◉ Yes ○ No ○ N/A	Is the disinfection adequate, residuals maintained, etc.?
◉ Yes ○ No ○ N/A	Are chlorine gas cylinders properly stored?
○ Yes ◉ No ○ N/A	If gas chlorination is used, are adequate safety precautions being followed?

10 States Standards 5.3 states in part: 1. Respiratory protection equipment, meeting the requirements of the National Institute for Occupational Safety and Health (NIOSH) shall be available where chlorine gas is handled 2. Shall be stored at a convenient heated location, but not inside any room where chlorine is used or stored. 3. The units shall use compressed air, have at least a 30 minute capacity, and be compatible with or exactly the same as units used by the fire department responsible for the plant. 10 States Standards 5.3.3 states in part: Where pressurized chlorine gas is present, continuous chlorine leak detection equipment is required and shall be equipped with both an audible alarm and a warning light. 10 States Standards 5.4 states in part: 1. Chlorine gas feed and storage shall be enclosed and separated from other operating areas. 2. The chlorine room shall be provided with a shatter resistant inspection window installed in an interior wall. 3. Constructed in such a manner that all openings between the chlorine room and the remainder of the plant are sealed. 4. Provided with doors equipped with panic hardware, assuring ready means of exit and opening outward only to the building exterior. 5. Each chlorine room shall have a ventilating fan with a capacity which provides one complete air change per minute when the room is occupied; where this is not appropriate due to the size of the room a lesser rate may be considered. 6. The ventilating fan shall take suction near the floor as far as practical from the door and air inlet, with the point of discharge so located as not to contaminate air inlets to any rooms or structures. 7. Air inlets shall be through corrosion resistant louvers near the ceiling. 8. Louvers for chlorine room air intake and exhaust shall facilitate airtight closure. 9. Separate switches for the ventilating fan and for the lights shall

be located outside of the chlorine room and at the inspection window. Outside switches shall be protected from vandalism. A signal light indicating ventilating fan operation shall be provided at each entrance when the fan can be controlled from more than one point. 10. Vents from feeders and storage shall be screened and shall discharge to the outside atmosphere, above grade. 11. The chlorine room location should be located in a corner of the building on the prevailing downwind side of the building and shall be away from entrances, windows, louvers, walkways, etc. 12. Floor drains are discouraged. Where provided, the floor drains shall discharge to the outside of the building and shall not be connected to other internal or external drainage systems. 13. Where located near residential or developed areas and deemed necessary by the reviewing authority, provision shall be made to chemically neutralize chlorine gas before discharge from the water treatment plant building into the environment. Such equipment shall be designed as part of the chlorine gas storage and feed areas to automatically engage in the event of any measured chlorine release. The equipment shall be sized to treat the entire contents of the largest storage container on site. 14. Chlorinator rooms should be heated to 60oF, and be protected from excessive heat. Cylinders and gas lines should be protected from temperatures above that of the feed equipment. 15. Pressurized chlorine feed lines shall not carry chlorine gas beyond the chlorinator room.

---There are small holes in the wall of the chlorine room. The system is to plug them. --- The fan and light in the chlorine room are controlled by a single switch which is located on the outside of the building. It does not appear to be protected from vandalism. It will be researched and determined whether or not this is an acceptable set-up and the system will be provided with direction.---The system does not have SCBA on the premises. They are to either obtain it or utilize their Emergency Response Plan (ERP) to directly establish a process for dealing with a chlorine leak. ---

◉ Yes ○ No ○ N/A	Is the treatment(s) sufficient to meet all of the NPDWS?
○ Yes ○ No ◉ N/A	Does the system meet 4-log virus inactivation at/or before the first customer?
◉ Yes ○ No ○ N/A	Is there restricted access to any unauthorized personnel from any portion of the treatment process?

Distribution System

Distribution System Material:	Flush Hydrants:	Fire Hydrants:
• Ductile Iron • Asbestos Cement	0	0

◉ Yes ○ No ○ N/A	Are pressures and flows adequate throughout the system under all conditions of flow? (excluding maintenance, system failures, and fireflow)
◉ Yes ○ No ○ N/A	Are plans of the water system available and current?
◉ Yes ○ No ○ N/A	Is there a regular flushing program?
◉ Yes ○ No ○ N/A	Are all services metered?
○ Yes ○ No ◉ N/A	Is there a properly designed loading station?
○ Yes ○ No ◉ N/A	Is there a valve maintenance and replacement program in place?
◉ Yes ○ No ○ N/A	Does the facility have a cross connection ordinance or policy in effect?
○ Yes ○ No ◉ N/A	Is the installation, testing, and inspection of cross connection control devices conducted in accordance to 327 IAC 8-10?
◉ Yes ○ No ○ N/A	Was the distribution system free from uncontrolled cross connections and are backflow prevention devices installed at all appropriate locations?
○ Yes ◉ No ○ N/A	Does the system have >25% water loss based on a 1 year average?

Finished Water Storage

Location Name:	
In Plant	☐ Icing Protection

Storage Type: Hydro-pneumatic - Vertical	☐ Corrosion Protection
Storage Capacity: 1,500 gallons	☐ Communication Antenna
Remarks:	☐ Separate Inlet and Outlet
	☐ Mixer

◉ Yes ○ No ○ N/A	Are storage reservoirs located above ground water level?
◉ Yes ○ No ○ N/A	Are the storage reservoirs protected against flooding?
◉ Yes ○ No ○ N/A	Are treated water storage reservoirs covered?
◉ Yes ○ No ○ N/A	Are storage reservoirs secure?
◉ Yes ○ No ○ N/A	Is the reservoir structurally sound?
◉ Yes ○ No ○ N/A	Is a storage maintenance schedule in place and records kept?
◉ Yes ○ No ○ N/A	Does surface run-off and underground drainage drain away from the storage structure?
◉ Yes ○ No ○ N/A	Are all pipes, air vents, and related appurtenances appropriately constructed and located?
◉ Yes ○ No ○ N/A	Is access restricted where necessary to prevent contamination?

Monitoring and Reporting

○ Yes ◉ No ○ N/A	Are there any current monitoring and/or reporting violations?
◉ Yes ○ No ○ N/A	Are the daily chemical tests being performed properly.
◉ Yes ○ No ○ N/A	Are testing facilities and equipment adequate?
○ Yes ◉ No ○ N/A	Do reagents used have an unexpired shelf life?

Deficiency - 327 IAC 8-2-8.2(e)(6)(A) states in part: Deficiencies relating to monitoring, reporting, and data verification, including the following: The use of improper procedures or methods when conducting required on-site laboratory analyses.

During the inspection it was discovered that the phosphate reagent being used for testing expired 01/18. The system replaced the expired packets with fresh ones while I was still on-site.

◉ Yes ○ No ○ N/A	Are records of all daily test results and compliance monitoring results being maintained?
◉ Yes ○ No ○ N/A	Are daily free and total chlorine residual measurements being made at the plant and in the distribution system?
◉ Yes ○ No ○ N/A	Are accurate records being maintained (amount of water treated, amount of chemical usage, etc)?
◉ Yes ○ No ○ N/A	Are MROs properly documented and submitted to IDEM on time?
○ Yes ◉ No ○ N/A	Does the system have an approved GWR triggered monitoring plan?

Management and Operations

◉ Yes ○ No ○ N/A	Are personnel adequately trained and/or certified?
◉ Yes ○ No ○ N/A	Is an emergency response plan available and up to date?
◉ Yes ○ No ○ N/A	Are supplies and maintenance parts inventories adequate?
◉ Yes ○ No ○ N/A	Is the financing and budget satisfactory?

◉ Yes ○ No ○ N/A	Are sufficient operation and maintenance records being kept?
◉ Yes ○ No ○ N/A	Are there sufficient personnel?
◉ Yes ○ No ○ N/A	Are permits being obtained for all repairs and construction?
○ Yes ○ No ◉ N/A	Are well logs being kept and available on site?
◉ Yes ○ No ○ N/A	Are routine maintenance schedules established and adhered to?
◉ Yes ○ No ○ N/A	Is there a current site sampling plan available and on file with IDEM?
◉ Yes ○ No ○ N/A	Does this plan require any updates or changes?

Deficiency - 327 IAC 8-2-8(a) states in part: Public water systems must collect total coliform samples at sites that are representative of water throughout the distribution system according to a written sample siting plan approved by the commissioner.

Recommendation: It would be a good idea for the system to make their Site Sampling Plan (SSP) maps more legible and easy to read.

◉ Yes ○ No ○ N/A	Is there an approved wellhead protection program being implemented by the system and is the plan up to date?
◉ Yes ○ No ○ N/A	For service interruptions lasting greater than 8 hours, are notifications being made to the customers?
◉ Yes ○ No ○ N/A	Are all direct and indirect additives certified for conformance to American National Standards Institute(ANSI)/National Sanitation Foundation (NSF) International Standard 60/61?

Point of Entry Information

POE Number	Point Of Entry Name	Point Of Entry Location	Wells Seller	Date In Service
1	EP001	1023 North Sir Galahad; Cromwell, IN	2	1/1/1995 ☐ Unknown

Treatment Plant Information

Plant Number:	Plant Name:	Plant Location Address:	
1	TP001	10230 N. Sir Galahad; Cromwell, IN	
Source:	Treatment Types:		Plant Date In Service:
2	Phosphate, Chlorine Gas Post-Disinfection		1/1/1995 ☐ Unknown

Inspection Result:

Deficiencies were discovered and require a submittal from you and/or follow-up inspection by IDEM

Narrative/Comment:

The system is to correct deficiencies cited on this report and submit documentation (e.g. photos) to IDEM.

Date Of Inspection Continued:

☑ Exit Interview

Date Of Report:	Responsible Official Contacted:
2/20/2018	2/20/2018

Multi Media Screening Results:

Multi-media screening not conducted

☐ Contact by IDEM's OPPTA Requested

Photos

Photograph Description:
The signage on the chlorine room door, as well as on the wall next to it need to be refreshed or replaced as they are faded and in a state of disrepair.

Photograph Description:
There are small holes in the wall of the chlorine room. The system is to plug them.

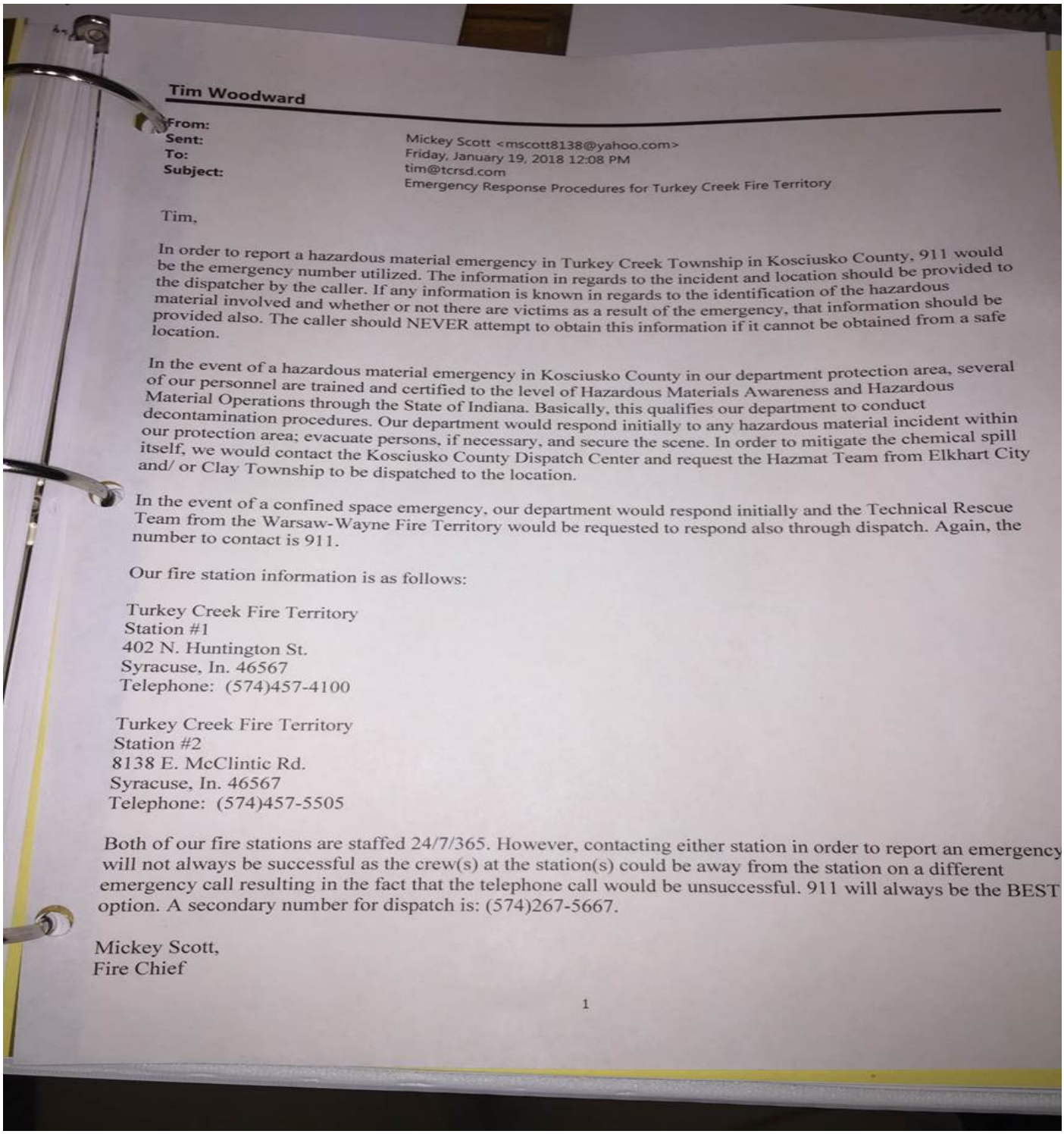
Photograph Description:

The fan and light in the chlorine room are controlled by a single switch which is located on the outside of the building. It does not appear to be protected from vandalism. It will be researched and determined whether or not this is an acceptable set-up and the system will be provided with direction.

Photograph Description:

---The system does not have SCBA on the premises. They are to either obtain it or utilize their Emergency Response Plan (ERP) to directly establish a process for dealing with a chlorine leak.---

---The system is to ensure that the ERP is reviewed/revised as needed, and a minimum of once per year.---



Tim Woodward

From: Mickey Scott <mscott8138@yahoo.com>
Sent: Friday, January 19, 2018 12:08 PM
To: tim@tcrsd.com
Subject: Emergency Response Procedures for Turkey Creek Fire Territory

Tim,

In order to report a hazardous material emergency in Turkey Creek Township in Kosciusko County, 911 would be the emergency number utilized. The information in regards to the incident and location should be provided to the dispatcher by the caller. If any information is known in regards to the identification of the hazardous material involved and whether or not there are victims as a result of the emergency, that information should be provided also. The caller should NEVER attempt to obtain this information if it cannot be obtained from a safe location.

In the event of a hazardous material emergency in Kosciusko County in our department protection area, several of our personnel are trained and certified to the level of Hazardous Materials Awareness and Hazardous Material Operations through the State of Indiana. Basically, this qualifies our department to conduct decontamination procedures. Our department would respond initially to any hazardous material incident within our protection area; evacuate persons, if necessary, and secure the scene. In order to mitigate the chemical spill itself, we would contact the Kosciusko County Dispatch Center and request the Hazmat Team from Elkhart City and/ or Clay Township to be dispatched to the location.

In the event of a confined space emergency, our department would respond initially and the Technical Rescue Team from the Warsaw-Wayne Fire Territory would be requested to respond also through dispatch. Again, the number to contact is 911.

Our fire station information is as follows:

Turkey Creek Fire Territory
Station #1
402 N. Huntington St.
Syracuse, In. 46567
Telephone: (574)457-4100

Turkey Creek Fire Territory
Station #2
8138 E. McClintic Rd.
Syracuse, In. 46567
Telephone: (574)457-5505

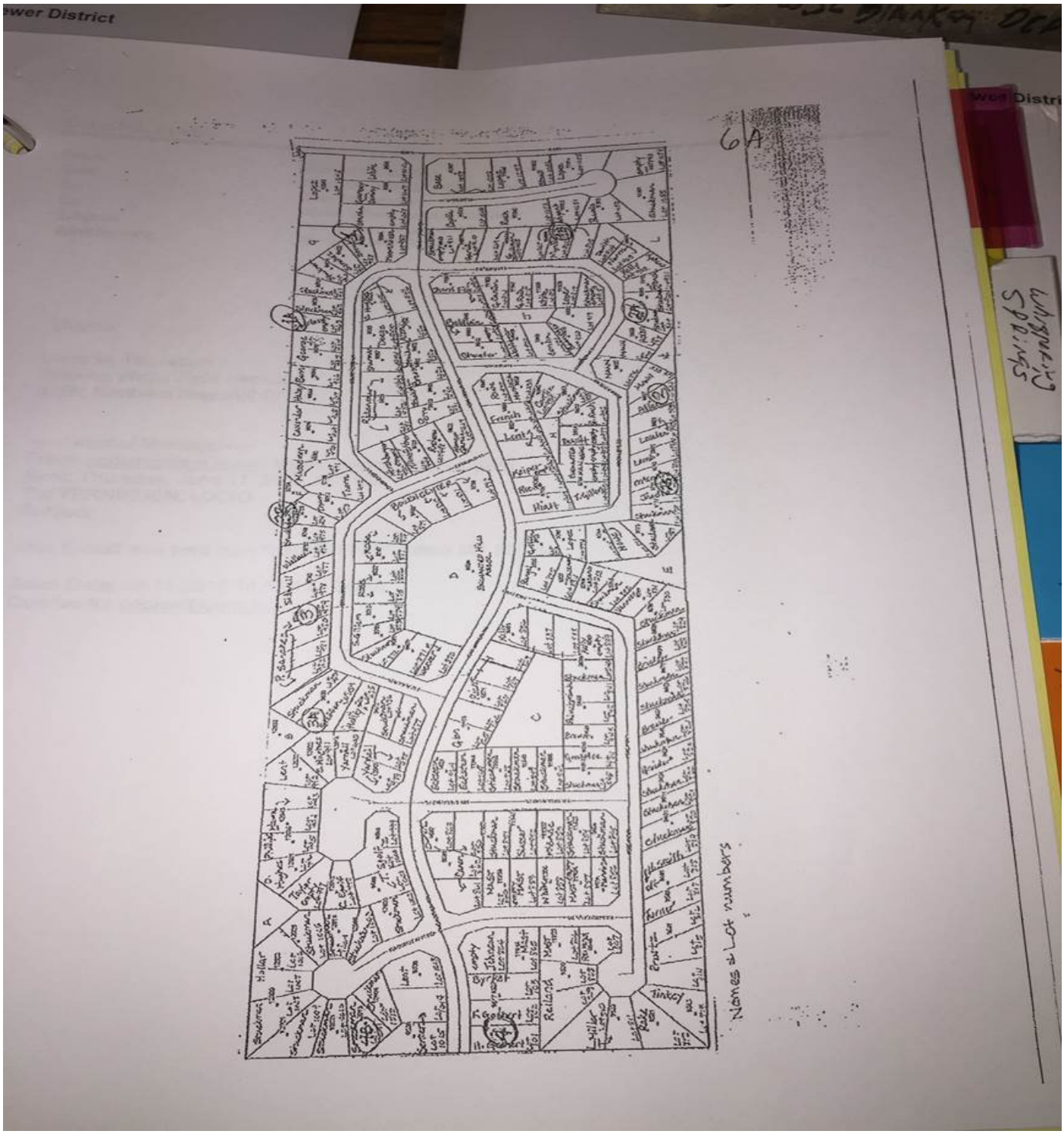
Both of our fire stations are staffed 24/7/365. However, contacting either station in order to report an emergency will not always be successful as the crew(s) at the station(s) could be away from the station on a different emergency call resulting in the fact that the telephone call would be unsuccessful. 911 will always be the BEST option. A secondary number for dispatch is: (574)267-5667.

Mickey Scott,
Fire Chief

1

Photograph Description:

Recommendation: It would be a good idea for the system to make their Site Sampling Plan (SSP) maps more legible and easy to read.



Photograph Description:

During the inspection it was discovered that the phosphate reagent being used for testing expired 01/18. The system replaced the expired packets with fresh ones while I was still on-site.

Photograph Description:

---There are low areas around the outdoor well that are susceptible to the pooling of water. The system is to fill these in.---

---Recommendation: It would be a good idea for the system to erect a barrier (e.g. ballasts, landscaping rock) to help protect the outdoor well from lawn equipment.---

---Vegetation overgrowth is an issue near the outdoor well. The system is to find a way to control this without the use of chemicals.---