



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

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

November 16, 2022

Via Email to: jb3540@gmail.com
Mr. Jim Boone, President
Turkey Creek Regional Sewer District
4852 North County Road 1200 West
Cromwell, Indiana 46732

Dear Mr. Boone:

Re: Inspection Summary Letter
Turkey Creek Regional Sewer District
NPDES Permit No. IN0045802
Cromwell, Noble County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Northern Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: November 15, 2022
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Conditions evaluated were found to be satisfactory at the time of the inspection.

A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Lynn Raisor at 317-691-0099 or by email to lraisor@idem.IN.gov.

Sincerely,

James E. Weingart, Director
Northern Regional Office

Enclosure



NPDES Wastewater Facility Inspection Report
 INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0045802		Facility Type: Municipality		Facility Classification: Minor		TEMPO AI ID 45343	
Date(s) of Inspection: November 15, 2022							
Type of Inspection: Compliance Evaluation Inspection							
Name and Location of Facility Inspected: Turkey Creek Regional Sewer District 4852 North County Road 1200 West Cromwell IN 46732				Receiving Waters: Cromwell Ditch		Permit Expiration Date: 5/31/2023	
County: Noble						Design Flow: .37MGD	
On Site Representative(s):							
First Name	Last Name	Title	Email	Phone			
Tim	Woodward	Superintendent	tim@tcrsd.com	574-529-0098			
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator: Tim Woodward	Number: 19287	Class: III	Effective Date: 7-1-21	Expiration Date: 6-30-24	Email: tim@tcrsd.com		
Cyber Security Contact:							
Name:				Email:			
Responsible Official: Mr. Jim Boone, President				Permittee: Turkey Creek Regional Sewer District			
4852 North County Road 1200 West Cromwell, Indiana 46732				Email: jb3540@gmail.com		Contacted? No	
Phone:				Fax:			
INSPECTION FINDINGS							
<input checked="" 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 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)							
S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent	S	Operation	S	Flow Measurement	N	Pretreatment
S	Permit	S	Maintenance	S	Laboratory	S	Effluent Limits Compliance
N	Collection System	S	Sludge Disposal	S	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
Receiving Waters:							
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 evaluated at the outfall and was free of notable foam, algae or solids. The effluent free falls into the receiving stream creating additional dissolved oxygen.							
Effluent:							
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.							
Permit:							
S 1. Did the facility have a current copy of the permit available for reference?							
S 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. A permit renewal application has been submitted to IDEM. The District is proposing the renewed permit contain a 5 year schedule for aeration system upgrades. These upgrades are expected to increase the WWTP treatment capacity.

Collection System:

N 1. CSO's were found to be adequately monitored and maintained.

N 2. There were maintenance-related (clogged or blocked lines) overflow events in last 12 months.

N 3. There were hydraulic (I&I) overflow events in last 12 months.

N 4. Facility has met SSO and dry weather CSO reporting requirements

N 5. Any adverse impacts from SSO and CSO events have been properly mitigated.

N 6. Lift stations were found to be adequately inspected, cleaned, and maintained, with adequate documentation of activities.

N 7. Collection system maintenance activities appeared to be adequate.

Comments:

The Collection System will be evaluated in a Sanitary Sewer Survey. The findings of the survey will be provided in a separate report.

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 consists of an aerated influent wet well, rotary screening, grit removal, oxidation ditches, secondary clarification, chemical phosphorus removal, UV disinfection (seasonal) and cascade post aeration. All required units of treatment were in service and all areas were accessible for inspection. The facility has a generator that exercises weekly and an extensive alarm system. The alarm system includes the influent pumps, rotary screen, RAS pumps, and secondary clarifiers. The facility is in the process of upgrading the clarifier telemetry to include sludge blanket depth. Once completed, operators will be alerted when the sludge blanket reaches a pre-set level.

The facility is in the final phase (approximately 90% completion) of a collection system expansion. The new service area includes 5 lift stations. The District is investigating aeration system upgrades, including VFD drives, for the oxidation ditch. This would allow the overall treatment capacity of the plant to be increased for future collection system expansion.

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.

S 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.

S 4. The facility was found to be operated efficiently during wet weather events.

Comments:

Overall, operations appeared excellent. Very good color and mixing, with minimal foam, was noted in the oxidation ditches. The two smaller clarifiers were out of service for the winter months due to lower flows. The in-service clarifiers were clean and clear, with no ashing or floating debris. The plant is manned daily and a staff member is on call 24 hours a day.

Solids are wasted daily based on analytical data and all wasting is well documented. MLSS is currently at 2000 mg/l. During the summer months, the MLSS volume is decreased. Wasted sludge is first thickened in an aerobic digester and then dried on drying beds.

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:

The facility appears to be very well maintained. All maintenance, for both the collection system and plant, are logged on operator logs. All records were available for review. As part of the new collection system expansion, the District is developing an asset management program. This program is approximately 60% complete and may be expanded in the future to include preventative and completed maintenance. The 22 generators throughout the District are serviced and maintained by a third party annually.

Sludge Disposal:

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

Comments:

A records review during the inspection showed adequate handling, and disposal of sludge. Dried sludge is land applied on neighboring fields twice annually under Land Application Permit INLA00356.

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.
- 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:

All sampling practices, including raw and intermediate unit process testing, are conducted accurately and at the frequency required by the permit. Both the influent and effluent samples are collected with automatic samplers. The effluent sampler has a refrigerated storage container, the influent sampler does not. Standard Methods states that samples should be stored at or below 6° C. It is recommended a refrigerated sampler be utilized for influent sampling or the existing sampler utilize some sort of cooling method, ie: ice. The effluent composite start/stop sample times, along with all grab samples, are well documented.

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.
- N 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.
- N 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 facility's flow measurement program, including all documentation, was found to be adequate and representative. All flow meters at the treatment plant, including the effluent flow meter, were last calibrated on August 24, 2022 by Franke Environmental.

Laboratory:

The following laboratory records were reviewed:

Sample Log

TSS Bench Sheets

Ammonia Bench Sheets

E. coli Bench Sheets

- S 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.

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

Contract Lab Information

CF Environmental

Ft. Wayne, IN

Comments:

The bench sheets reviewed during the inspection appeared to be accurate and complete. The facility conducts extensive Quality Control testing that includes duplicates, blanks, and known standards on a daily basis. CBOD testing is currently being completed by CF Environmental.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of November 2021 to October 2023 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.
- N 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:

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

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 or an Agreed Order.

Pretreatment:

- N 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 (SUO) 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 contributors and does not accept hauled waste.

Effluent Limits Compliance:

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

DMRs for the period of November 2021 to October 2023 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

No effluent limitation violations were reported during the period reviewed.

IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Lynn Raisor

lraisor@idem.IN.gov

317-691-0099

IDEM MANAGER REVIEW

IDEM Manager:

Date:

James E. Weingart

11/15/2022