



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

June 22, 2020

Via Email to: dennis.buckley@beechgrove.com
The Honorable Dennis Buckley, Mayor
City of Beech Grove Sewage Works
806 Main Street
Beech Grove, Indiana 46107

Dear Mayor Buckley:

Re: Inspection Summary/ Noncompliance Letter
Beech Grove Sewage Works
Beech Grove, Marion 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: June 10, 2020
Type of Inspection: Sanitary Sewer Survey
Inspection Results: Violations were observed.

The following concerns were noted:

The collection system evaluation generated an unsatisfactory rating due to past occurrences of overflowing sewage from sanitary sewers and backups into citizen's basements due to hydraulic overloading of the sewers during rain events. These discharges are violations of IC 13-30-1, which states in part, that a person may not discharge, emit, cause, allow, or threaten to discharge, emit, cause or allow any contaminant or waste, into the environment in any form that causes or would cause pollution that violates or would violate rules, standards, or discharge or emission requirements adopted by the appropriate board under the environmental management laws.

Basement back-ups are exacerbated by the existence of perimeter drains and basement floor drains that had been connected into sanitary sewers in years past. The utility must survey the collection system to determine where perimeter drains and basement floor drains are located and home-owners must be notified that they can report basement overflows and backups through some mechanism provided by the utility. Records of basement back-up reports must be maintained by the utility and made available upon IDEM's request.

The collection system evaluation was also rated unsatisfactory due to the utility having known overflows which were not reported to IDEM. 327 IAC 2-6.1-7 States any person who operates, controls, or maintains any mode of transportation or facility from which a spill occurs shall, upon discovery of a reportable spill to the soil or surface waters of the state, do the following: (1) Contain the spill, if possible, to prevent additional spilled material from entering the waters of the state. (2) Undertake or cause others to undertake activities needed to accomplish a spill response. (3) As soon as possible, but within two (2) hours of discovery, communicate a spill report to the Department of Environmental Management, Office of Land Quality, Emergency Response Section: Area Code 1-888-233-7745 for in-state calls (toll free), (317) 233-7745 for out-of-state calls. If new or updated spill report information becomes known that indicates a significant increase in the likelihood of damage to the waters of the state, the responsible party shall notify the department as soon as possible but within two (2) hours of the time the new or updated information becomes known.

For reporting overflows from sanitary sewers that do not appear to constitute an immediate danger to human health or to aquatic life, Office of Water Quality recommends use of the Bypass/Overflow Incident Report, which is available by clicking this link: <https://forms.in.gov/Download.aspx?id=5462>.

As a result of poor maintenance of the collection system, as well as, sanitary sewer overflows, inspector recommends the facility receives an operational permit. In addition, future sanitary sewer overflows could be cause for referral to the OWQ Enforcement Section.

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. **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 . Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Groce', with a large, sweeping flourish 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: No Permit	Facility Type: Municipality	Facility Classification: Minor	Facility Classification: NA	TEMPO AI ID
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Date(s) of Inspection: June 10, 2020

Type of Inspection: Sanitary Sewer Survey

Name and Location of Facility Inspected: Beech Grove Sewage Works 5520 Churchman Avenue Beech Grove IN 46203	County: Marion	Receiving Waters: Discharges to Citizen's Wastewater	Permit Expiration Date: No Permit
			Design Flow: NA

On Site Representative(s):				
First Name	Last Name	Title	Email	Phone
Phil	Gurganus	Superintendent	phil.gurganus@beechgrove.com	
Brad	Meriwether	Public Works Director	brad.meriwether@beechgrove.com	

Was a verbal summary of findings presented to the on-site representative? **Yes**

Certified Operator: NA	Number:	Class:	Effective Date:	Expiration Date:	Email:
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Cyber Security Contact:
Name: _____ Email: _____

Responsible Official: The Honorable Dennis Buckley, Mayor 806 Main Street Beech Grove, Indiana 46107	Permittee: City of Beech Grove Sewage Works Email: dennis.buckley@beechgrove.com Phone: _____ Fax: _____
Contacted? No	

INSPECTION FINDINGS

- Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- Potential problems were discovered or observed. (3)
- Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- 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	N	Compliance Schedules
N	Effluent	N	Operation	N	Flow Measurement	N	Pretreatment
N	Permit	N	Maintenance	N	Laboratory	N	Effluent Limits Compliance
U	Collection System	N	Sludge	N	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

This inspection was the result of a citizen complaint of a sewer overflow on their property.

Since the Beech Grove Sewer Utility does not include an NPDES Permitted facility and there are no Combined Sewer Overflows (CSOs) nor permit-defined Sanitary Sewer Overflow points (SSOs), and there are no lift stations in the system, The Collection System items, 1 through 7 below were not applicable to this inspection. The Collection System evaluation was based on the Sanitary Sewer Survey criteria.

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.

Sanitary Sewer Survey:

1. How often are lift stations visually inspected?
The utility does not own any lift stations. There are five private lift stations that discharge to their sewers.
2. During lift station inspections, what does the inspection include?
NA
3. Are all lift station inspection tasks fully documented?
NA
4. Do all lift stations have adequate provisions for back-up power?
NA
5. How often are manholes visually inspected?
Manholes west of Emerson were inspected during a 2005 sanitary system evaluation. The utility does not have an ongoing manhole inspection program.
6. Describe the checklist or inspection sheet used to document manhole inspections.
There has been no checklist or inspection sheet developed for manhole inspections.
7. Does the facility have maps of the entire sewer system, that detail lift stations and manholes?
The utility does have an accurate map of the entire collection system including manholes.
8. How often are sewer lines cleaned, and is there a schedule or is the cleaning done as-needed?
The sewer lines are cleaned on an as-needed basis. There is no cleaning schedule.
9. Is there a plan for fixing known infiltration/inflow (I&I) sources, how many are fixed per year, and what documentation is kept?
The utility has an I&I / sanitary system evaluation west of Emerson performed in 2005. They were able to address most of the highest priority level as well as point repairs. However, the rest of the system has not been addressed recently and the lower level priorities identified during the study were not repaired. Utility staff stated they have no plan until funds become available.
10. Describe smoke or dye testing, televising, or other I&I investigations, percentage of the system studied, and documentation.
During the above-noted study, the contractor televised sewers. West of Emerson is approximately 75% of the collection system.
11. Describe chemicals that are used in the collection system, their purpose, and how often they are used.
No chemicals have been used in the collection system.
12. Is the Sewer Use Ordinance (SUO) up-to-date, enforced, and does the SUO prohibit discharge of clear water into sewers?
The SUO was last adopted 02/28/2020. The SUO prohibits the introduction of storm water to non-combined sanitary sewers. However, it is known that many home perimeter drains in the City are connected to the sanitary sewer. The City should enforce their SUO ordinance and have clear water removed from the sanitary system.
13. How many sewer overflows have occurred during the past 12 months? Detail whether they were rain or maintenance related.
The facility has not reported overflows but stated that a few have occurred.
14. Were problems noted in the way that overflows have been reported to IDEM?
Yes. The facility did not report known overflows.
15. Is there evidence that overflows have occurred that have not been reported to IDEM?
Yes. The facility did not report known overflows.
16. Is there a plan for regular inspection of locations where previous overflows have occurred in the past?
There is currently no plan for inspection of known overflows.
17. Detail any satellite sewer collection systems that discharge into the facilities sewers, including approximate daily flows from each.
There are five private lift stations that discharge into Beech Grove sewers.
18. Describe the protocol for inspection of satellite systems, including how the SUO is enforced in satellite systems.
The facility involves the Marion County Health Department in resolving private lift station issues and it has worked well.

Comments:

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Effluent Limits Compliance:

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

Comments:

IDEM REPRESENTATIVE

Inspector Name:	Email:	Phone Number:
Kim Rohr	krohr@idem.IN.gov	317-719-1666
Other staff participating in the inspection:		
Name(s)	Phone Number(s)	
Andy Schmidt	317-691-1905	

IDEM MANAGER REVIEW

IDEM Manager:	Date:
Andy Schmidt	6/18/2020