

INSPECTION REPORT

Inspection Entry Date/Time	11/06/2024 09:30 AM (ET)	Announced: Yes	
Inspection Exit Date/Time	11/06/2024 02:15 PM (ET)	Access: Granted	
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Permittee Name	Kendallville WWTP		
Facility or Site Name	Kendallville WWTP		
Facility/Site Physical Address	501 West Wayne Street		
City, State, Zip Code	Kendallville, IN 46755		
Facility GPS Coordinates	41.446444, -85.273806		
FRS ID	110005973900		
Permit Number(s) (If Applicable)	IN0020656		
SIC and/or NAICS	4952		
Persons Participating in Inspection:			
Title	Name	Organization	
Lead Inspector	Valerie Dooling	US EPA Water Enforcement and Compliance Assurance Branch (WECAB)	
WWTP Superintendent	Pat Howell	Kendallville WWTP Superintendent	
Pretreatment Supervisor	Trevor Hampshire	Kendallville WWTP Pretreatment Supervisor	
IDEM Inspector	Lynn Stackhouse	Indiana Department of Environmental Management (IDEM)	
IDEM Inspector	Aaron Deeter	Indiana Department of Environmental Management (IDEM)	
Lead Inspector:			
Valerie Dooling	VALERIE DOOLING	Digitally signed by VALERIE DOOLING Date: 2025.01.21 10:13:46 -06'00'	
	EPA Region 5	Dooling.Valerie@epa.gov	(312) 886-7167
Supervisor Review:			
Ryan Bahr	Ryan Bahr	Digitally signed by Ryan Bahr Date: 2025.01.21 15:36:16 -06'00'	
Section 2 Supervisor, WECAB	EPA Region 5	bahr.ryan@epa.gov	

Kendallville WWTP

Inspection Date(s): 11/06/2024

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA and IDEM Inspectors Lynn Stackhouse and Aaron Deeter arrived together at the site for concurrent inspections.

EPA Region 5 Lead Inspector, Valerie Dooling, arrived at the Kendallville Wastewater Treatment Plant (the “Site” or “Facility”), located at 501 West Wayne Street, Kendallville, IN 46755, at 09:30 AM (ET) on 11/06/2024 for an announced inspection. EPA Region 5 Lead Inspector presented credentials to WWTP Superintendent, Pat Howell, and informed him that this was an EPA Region 5 inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by Kendallville WWTP representatives, direct observations made by the EPA Region 5 inspector, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspector, physical evidence collected by the EPA Region 5 inspector, measurements taken by EPA Region 5 inspector, verbal or written statements made by information supplied by Kendallville WWTP representatives during or subsequent to the on- site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspector(s) by Kendallville WWTP representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of EPA, State, and/or public records may be included in this report.

Facility/Site Description

After the opening conference, I asked about the facility and the Superintendent confirmed the following information about the facility:

The permittee operates a Class III, 2.68 million gallons per day (MGD) single-stage nitrification activated sludge plant consisting of grit removal, bar screening, primary clarification, aeration, secondary clarification, phosphorus removal, ultraviolet light disinfection, and post aeration. Sludge is treated by anaerobic and aerobic digesters and de-watered via a screw press. Final sludge will be landfilled. The collection system is composed of approximately 35 miles of separate storm sewers, 53 miles of separate sanitary sewers, and 4 miles of combined sanitary and storm sewers.

Facility/Site Information

Have any bypasses or overflows happened at the plant or in the collection system in the last year?	The superintendent confirmed that one sanitary sewer overflow occurred in the last year due to broken pressure release valve in a forcemain which released sewage into a field.
Industrial Users	Two SIUs: Kraft Heinz Company and Creative Liquid Coatings
Outfalls:	Two Outfalls: CSO Outfall 002 and Effluent Outfall 003

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WWTP Design Capacity & Average Daily Flow	Average design flow of 2.68 MGD and peak flow of 6.48 MGD
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SECTION II – OBSERVATIONS

Location: Review AOC Interim Compliance Plan	
Observation #: VD1-OB-001	Date: 11/06/2024
The WWTP Superintendent told me that he would like to take primary clarification offline and has submitted a request to IDEM to do so. It would be a temporary troubleshooting experiment to determine if putting all the CBOD into the aeration tanks will help during periods of IU shutdown when CBOD is limited. Included in this request are TSS and CBOD monthly averages from raw wastewater entering the primary clarifiers, the primary clarifier effluent and the calculated percent removal that occurs in the primary clarification tanks. During May and June 2024, a negative 5% and 9% removal of CBOD occurred and during February 2024, a negative 152% removal of TSS occurred in the primary tanks. I asked the Superintendent what he thinks caused the negative removal efficiency and he did not know. He thinks that the WWTP flows and BOD loading have decreased and suspects that it might be related to the negative removals in the primary clarifiers. I asked how he sampled for the data and he told me that he took samples of the raw primary influent and the primary effluent at the same time in the early morning. The sample collection did not account for a hydraulic residence time of the water in the tank (i.e. both primary influent and effluent were collected at the same time). During the inspection, while the primary clarifiers were online, the sludge from the primary clarifiers is directed to an anaerobic digester then screw press and the pressate is currently routed back into the primary clarifiers.	

Location: Review AOC Interim Compliance Plan	
Observation #: VD1-OB-002	Date: 11/06/2024
The WWTP Superintendent told me that the sluice slide gates have been installed and the SCADA panel for those gates is already installed but currently not operational. Before it is operational it still needs an electrician to complete the project. The sluice gates are designed to automatically lower slide gates which is based off of incoming flow but it is not based on incoming pollutant concentration or loading. The WWTP Superintendent expects the gates to be operational before December 2024.	

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Location: Review AOC Interim Compliance Plan

Observation #: VD1-OB-003

Date: 11/06/2024

The WWTP Superintendent told me that the thermal bulking of the secondary clarifiers is completed and was finalized around July 2024 (Photos 1-4). I took thermal images of Clarifier 1 (Photos 5-6, 11-14) and Clarifier 2 (Photos 7-10, 15-16) in morning and afternoon to identify temperature fluctuations of the wastewater).

Location: Review AOC Interim Compliance Plan

Observation #: VD1-OB-004

Date: 11/06/2024

The WWTP Superintendent told me that chemical additions, as part of the Administrative Order on Consent Compliance Plan that Kendallville has with US EPA, has been completed. However, the facility is currently not using most of the chemical additives that it had been in previous years. The only two additives that it uses are an orthophosphate drip at the start of the aeration basin which is regulated by ORP probes in each of the basins. The drip is turned on when ORP is below 1. The second additive is an alum-based chemical called FLOC4000. The facility is not feeding a supplement for low BOD periods or using any of the other chemicals that it had been in previous years.

Location: Review AOC Interim Compliance Plan

Observation #: VD1-OB-005

Date: 11/06/2024

The facility is testing for process control each day (seven per week) and will continue at this rate until January 2025, when the Superintendent expects Kraft's pretreatment system to begin operation. The WWTP is testing for TSS, Ammonia, Phosphorus, DO, pH, CBOD and COD in its raw, primary and final effluent and for MLSS, MLVSS in all four aeration tanks and also determining the primary predicted BOD, MLVSS. It is planning to add sludge blanket depth data. The superintendent wants data both while the plant is performing alright, at the time of the inspection, and also as Kraft begins a shutdown period for the holidays and how the WWTP performs while receiving lower incoming BOD levels which has historically been difficult for the plant. Microbiology tests are also taken periodically, approximately twice per year, and the Superintendent expects one test taken when the plant is okay and another taken during the time that that plant is receiving lower incoming BOD levels.

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Location: Review AOC Interim Compliance Plan

Observation #: VD1-OB-006

Date: 11/06/2024

As part of funding from American Rescue Plan, the facility has completed:

1. Enhanced pump feed system skid
2. Caustic feed pumps, containment equipment and SCADA interface
3. Pump SCADA interface and chemical tank
4. Pump feed skid and SCADA interface
5. Four raw sewage pumps with SCADA
6. TSS effluent meter and SCADA interface
7. Add on sanitary sewer reline project for 700S Main St.

Location: Review AOC Interim Compliance Plan

Observation #: VD1-OB-007

Date: 11/06/2024

The facility has not started any work on redirection of pressate to digesters. The Superintendent hopes that if he is able to permanently remove the primary clarifiers then that would eliminate the pressate, since it is from the primary sludge. He has seen the project to redirect pressate as a contingency project and that it would occur if he cannot permanently remove primary clarification and if the POTW is still having effluent exceedances once the IU's pretreatment facility loadings stabilize.

Location: Review AOC Interim Compliance Plan

Observation #: VD1-OB-008

Date: 11/06/2024

The project to improve the aeration system and provide more oxygen to the aeration basins is underway. All the supplies and parts have arrived at the facility and they have drained Aeration Tank 4. The Superintendent expects next week that they will add more diffusers to Aeration Tank 4. He expects that they can accomplish one tank per week. Once Tank 4 has been completed, then Aeration Tank 3 will be drained and Tank 4 put back in service. He expects that the construction on this project will be completed by December 31, 2024.

Location: Review AOC Interim Compliance Plan

Observation #: VD1-OB-009

Date: 11/06/2024

The Superintendent stated that the collection system improvements have been occurring regularly and he expects that it will continue. The project reduces I&I by relining approximately 3000 linear feet of pipes per year.

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Inspection Date(s): 11/06/2024

Location: Discussion

Observation #: VD1-OB-010

Date: 11/06/2024

The pretreatment supervisor stated that revised industrial user permits have not been issued to Kendallville's Industrial users at the time of the inspection. He anticipates that new permits will be issued at the beginning of 2025 to each industrial user. Kendallville updated its sewer use ordinance to revise the local limits for mercury and a permit modification was issued to the industrial user, CLC. Kendallville also included new local limits in the sewer use ordinance that previously contained only surcharge thresholds, however, Kendallville had not modify their significant industrial user, Kraft's existing permit to reflect the newly established limits.

Location: Discussion

Observation #: VD1-OB-011

Date: 11/06/2024

There was one sanitary sewer overflow which had previously been reported to IDEM. This occurred when the pressure release valve on a force main rusted off and was released from the pipe into a field. The facility responded immediately and shut off the wastewater flow from the forcemain and then replaced all pressure release valves to prevent future issues.

Location: Discussion

Observation #: VD1-OB-012

Date: 11/06/2024

I asked the WWTP Superintendent whether the relationship between cBOD and BOD at the facility or from the Industrial User, Kraft, had either been established or calculated. He told me that they had not been. I noted that Kraft had been submitting total BOD (tBOD or BOD) sample results to Kendallville prior to the reissuance of its permit in October 2020 but had been submitting monitoring results for cBOD after that date. He told me that he believed the effluent monitoring requirement for their Industrial Users had changed from BOD to cBOD during that permit reissuance. I noted that the Kendallville Sewer Use Ordinance lists BOD and Chemical Oxygen Demand as local limits with concentration limits but it does not list cBOD as a local limit. The WWTP Superintendent told me that he was not aware that cBOD was not a local limit in Kendallville's Ordinance.

Location: Physical Inspection

Observation #: VD1-OB-013

Date: 11/06/2024

The WWTP Superintendent, WWTP Pretreatment Supervisor, IDEM Inspectors and I began the site walkthrough at 12:15 pm ET and concluded site walkthrough at 1:23 pm ET. At that time, we viewed the headworks, the sluice gates that were installed, and an unfinished electrical panel which was installed for the sluice gates.

We viewed six primary clarifiers, and I observed that three were being used at the time. We viewed four aeration basins, and I observed that three were in use at the time and the fourth was emptied in preparation for aeration diffusers to be added. I noted that each tank had an ORP monitor reading between (-300) and (-500). We viewed the secondary clarifiers and the Superintendent stated that they had been cleaned within the last week and they were scheduled to be cleaned weekly.

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Inspection Date(s): 11/06/2024

We viewed the pumphouse where four pumps used for primary clarifiers were located. One pump was not in operation and the Superintendent explained that they were waiting for parts. IDEM Inspectors noted that the pump that was not operational was a backup and if an additional pump became out of service, then the treatment plant would not be able to reach its maximum peak flow.

We viewed the chemical storage area and saw that only the FLOC 4000 tank was full and the other tanks were empty. We viewed the sludge press which was currently pressing anaerobic sludge. The WWTP Superintendent explained that the same press is used for both aerobic or anaerobic sludge and that it does need to switch chemical additives when pressing either aerobic or anaerobic. The Superintendent explained that the aerobic digester tank is designed to not have to waste sludge for over 30 days and the Superintendent explained that he is trying to run it without wasting as sludge as frequently, more in line with how it was designed. He stated that he runs one hour of aeration and then 23 hours for settling and has not had to press sludge for a while.

I observed that the UV system was not in operation at the time of inspection since the NPDES permitted effluent limits for E. coli are seasonal and were not in effect at the time of the inspection. The Superintendent said the UV system had been removed from service at the end of October.

Location: Physical Inspection	
Observation #: VD1-OB-014	Date: 11/06/2024
I observed that the treated effluent after clarification and just prior to gravity cascade has vegetation and a visible film floating on it (Photo 18).	

SECTION III –CYBERSECURITY

A cybersecurity inspection was performed as part of the US EPA inspection.

SECTION IV –AREAS OF CONCERN

1. Kendallville issues Industrial User Permits to monitor for cBOD, and cBOD is limited in Kendallville's NPDES Permit but Kendallville does not have a cBOD local limit.
2. BOD is a local limit according to the Kendallville Sewer Use Ordinance but the permits issued to Kendallville's industrial users do not include BOD monitoring requirements or limits. Kendallville had not modified or reissued permits to its industrial users since changing BOD from a surcharge limit to a local limit.
3. I observed vegetation and a visible film on the treated effluent just prior to the gravity cascade.
4. The facility has not started any work on redirection of pressate to digesters. According to the City of Kendallville's Compliance plan this work was expected to be completed by May 2024.

SECTION V - IDEM AREAS OF CONCERN

IDEM inspection report is attached to the inspection as Appendix B. The following concerns were noted:

1. Preventative maintenance plan and historical documentation was missing or absent due to a severed contract with the facilities' electronic maintenance program
2. Electronic laboratory bench sheet program allows for editing benchsheet data and does not track who created, edited or deleted data.
3. Inputted data on DMR sheets identified the incorrect number of effluent violations.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA Region 5 Lead Inspector held a closing conference with Facility personnel at 02:15 PM (ET) on 11/07/2024 for the inspection. During the closing conference, EPA Region 5 Lead Inspector discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

Kendallville WWTP

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SECTION VII – LIST OF APPENDICES

1. Photo Log
2. IDEM Inspection Report

Kendallville WWTP

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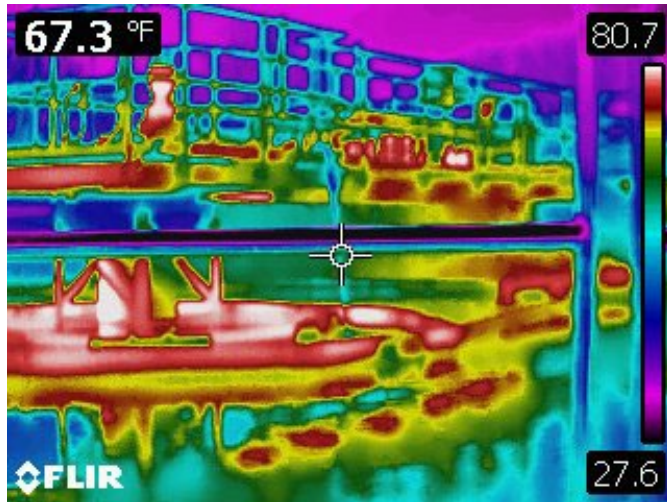
APPENDIX 1: PHOTO LOG

Kendallville WWTP

EPA Inspection November 6, 2024

All photos taken by Val Dooling, Environmental Engineer, U.S. EPA

Camera: FLIR T420



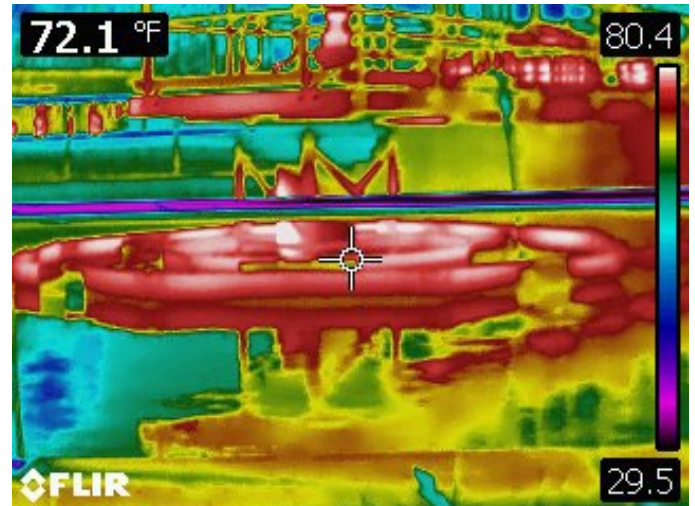
1: FLIR0826

Description:

Location: Clarifier 1

Camera Direction: Southwest

Date/Time: November 6, 2024, 11:57 AM



3: FLIR0828

Description:

Location: Clarifier 1

Camera Direction: Southwest

Date/Time: November 6, 2024, 11:57 AM



2: FLIR0827

Description: Visible light image of Photo 1. The thermal bulking project had been completed and the ground surrounding the clarifier has been raised to within a foot of the edge of the clarifier.

Location: Clarifier 1

Camera Direction: Southwest

Date/Time: November 6, 2024, 11:57 AM



4: FLIR0829

Description: Visible light image of Photo 3

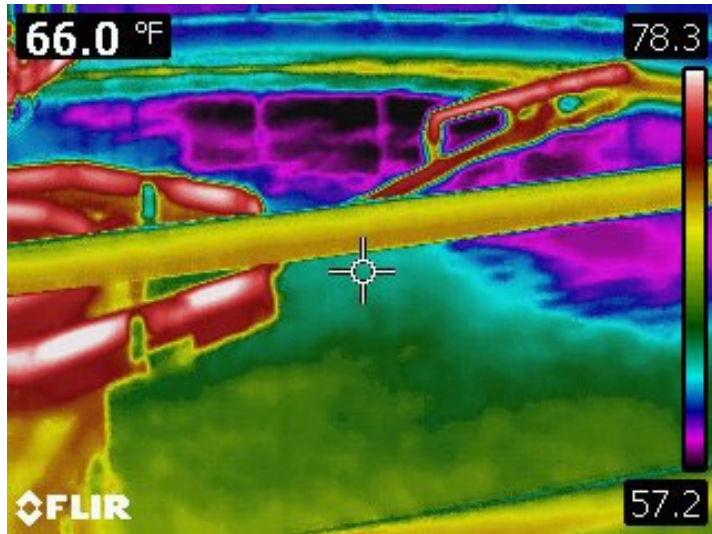
Location: Clarifier 1

Camera Direction: Southwest

Date/Time: November 6, 2024, 11:57 AM

Kendallville WWTP

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5: FLIR0830

Description: Infrared image of wastewater in Clarifier 1. The center of the clarifier is registering around 66F and portions of clarifier is as low as 57F.

Location: Clarifier 1

Camera Direction: East

Date/Time: November 6, 2024, 11:58 AM



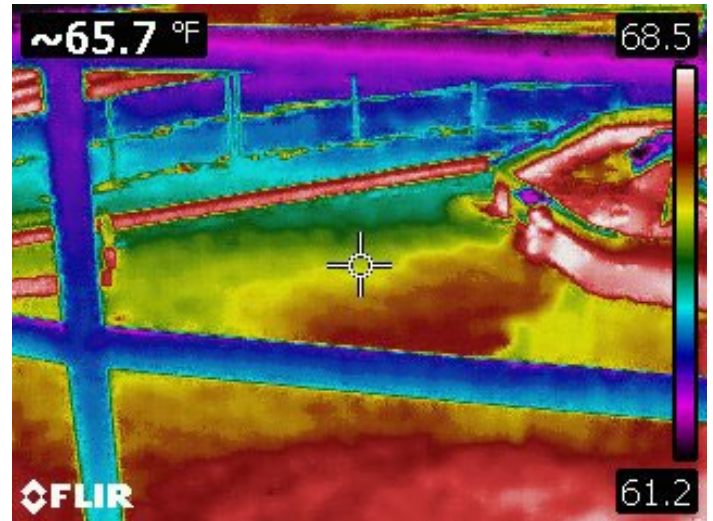
6: FLIR0831

Description: Visible light image of Photo 5

Location: Clarifier 1

Camera Direction: East

Date/Time: November 6, 2024, 11:58 AM



7: FLIR0838

Description: Infrared image of wastewater in Clarifier 1. The center of the clarifier is registering around 66F and no portions of the water in the clarifier is below 61F.

Location: Clarifier 1

Camera Direction: East

Date/Time: November 6, 2024, 2:58 PM



8: FLIR0839

Description: Visible light image of Photo 13

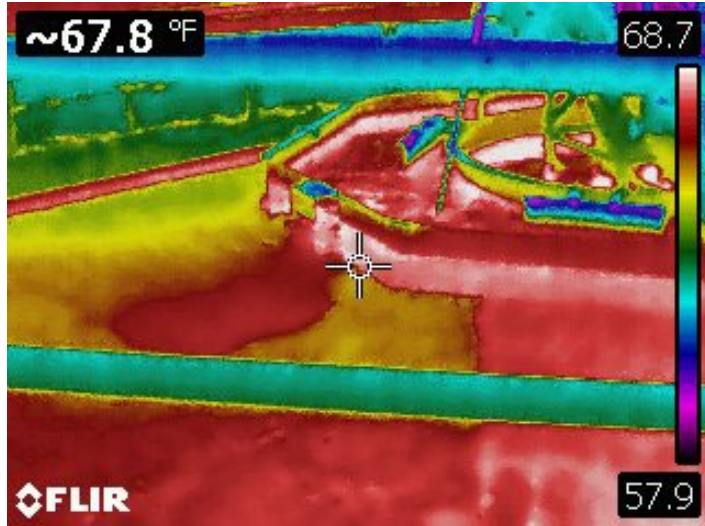
Location: Clarifier 1

Camera Direction: East

Date/Time: November 6, 2024, 2:58 PM

Kendallville WWTP

Inspection Date(s): 11/06/2024



9: FLIR0836

Description: Infrared image of wastewater in Clarifier 1. Wastewater is reading at a similar temperature as the center of the clarifier around 67F.

Location: Clarifier 1

Camera Direction: East

Date/Time: November 6, 2024, 2:58 PM



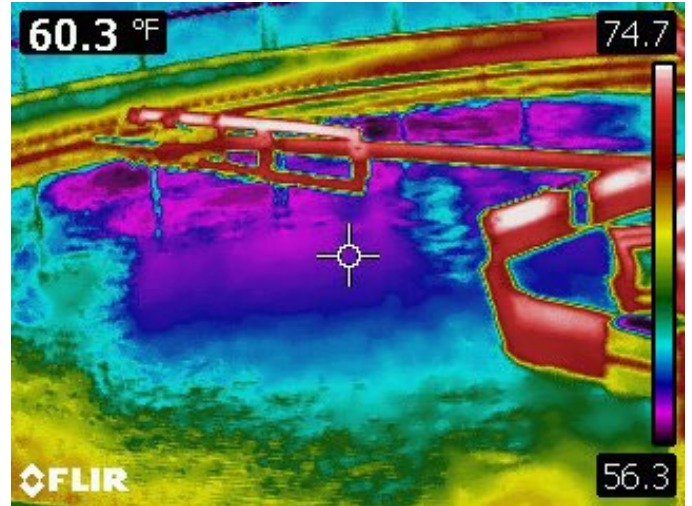
10: FLIR0837

Description: Visible light image of Photo 11.

Location: Clarifier 1

Camera Direction: East

Date/Time: November 6, 2024, 2:58 PM



11: FLIR0832

Description: Infrared image of wastewater in Clarifier 2. The center of the clarifier is registering around 60F.

Location: Clarifier 2

Camera Direction: West

Date/Time: November 6, 2024, 11:58 AM



12: FLIR0833

Description: Visible light image of Photo 7

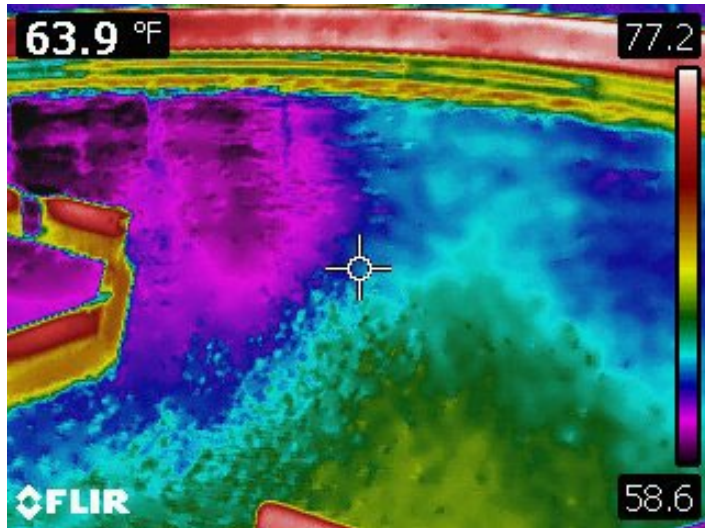
Location: Clarifier 2

Camera Direction: West

Date/Time: November 6, 2024, 11:58 AM

Kendallville WWTP

Inspection Date(s): 11/06/2024



13: FLIR0834

Description: Infrared image of wastewater in clarifier 2. The center of the clarifier is registering around 64F and portions of clarifier is as low as 58F.

Location: Clarifier 2

Camera Direction:

Date/Time: November 6, 2024, 11:59 AM



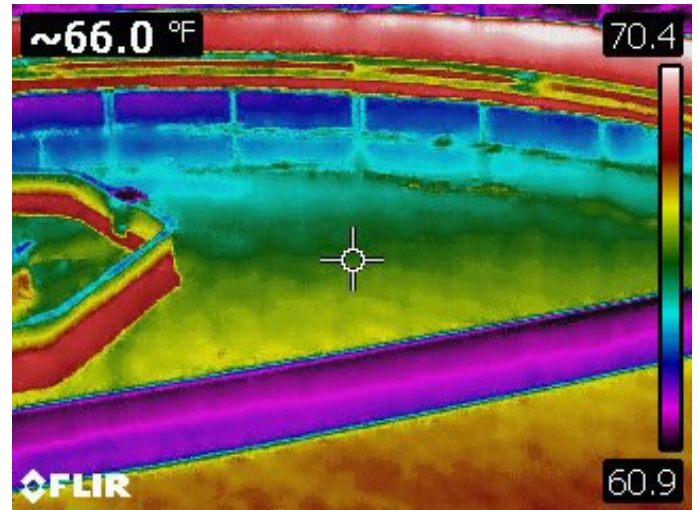
14: FLIR0835

Description: Visible light image of Photo 9

Location: Clarifier 2

Camera Direction: West

Date/Time: November 6, 2024, 11:59 AM



15: FLIR0840

Description: Infrared image of wastewater in Clarifier 2. The center of the clarifier is registering around 66F and no portions of the water in the clarifier is below 60F.

Location: Clarifier 2

Camera Direction:

Date/Time: November 6, 2024, 2:59 PM



16: FLIR0841

Description: Visible light image of Photo 15.

Location: Clarifier 2

Camera Direction: West

Date/Time: November 6, 2024, 2:59 PM

Kendallville WWTP

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17: FLIR0843

Description: Treated wastewater just prior to entering the final stage of treatment, the gravity cascade, and discharge to receiving waters.

Location: Post Aeration

Camera Direction: East

Date/Time: November 6, 2024, 3:00 PM

APPENDIX 2: IDEM INSPECTION REPORT



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-8027 • (317) 232-8803 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

November 08, 2024

Via Email to: mayor@kendallvillein.gov
The Honorable Lance Walters, Mayor
City of Kendallville
234 South Main
Kendallville, Indiana 46755

Dear Mayor Walters:

Re: **Inspection Summary/ Noncompliance Letter**
Kendallville Wastewater Treatment Plant
NPDES Permit No. IN0020656
Kendallville, 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 06, 2024
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

1. Maintenance was rated as unsatisfactory due to an inadequate preventative maintenance plan/program and no current or historical documentation of maintenance that has been completed at the wastewater treatment plant. This is a violation of Part II. B. 1 of the permit which requires all facilities to be operated and maintained as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. This maintenance must be documented.

In the past, the facility utilized an electronic maintenance program called JobCal. This program created work orders and was a mechanism to track/store completed and planned maintenance but staff reported that the program had not been used or updated for some time. Recently, the contract with JobCal was severed by treatment plant management and no new preventative maintenance program was created or implemented. During the inspection, it was identified that all historical JobCal information, while admittedly by staff as not up to date, was lost.

A Preventative Maintenance Plan must be developed for all units of

treatment. The documentation must include both a preventative maintenance schedule for units of treatment, when said maintenance was completed, and any reactionary maintenance for mechanical failure/problems.

Of concern to IDEM is that one of the four influent pumps was out of service and has been since June. Staff reported it is in for repairs. The superintendent stated if another influent pump fails, the plant will not have the pumping capacity to reach peak flows during a wet weather event.

2. Laboratory was rated as unsatisfactory. Part I. B. 6 of the NPDES permit requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit. In addition, Part I. B. 8 of the permit requires the permittee to retain, for a minimum of three years, all records and information resulting from the monitoring activities required by the permit, including all records of analyses performed.

In late April 2024, the facility began utilizing an electronic laboratory bench sheet using a computer tablet to input data. This system is called reMarkable. Laboratory staff input each step of testing for all parameters, along with all laboratory temperatures and calibrations. The system has read-only access for all treatment operators, but is editable after the analysis is completed by laboratory staff and management. The data remains editable until staff manually convert the data to a pdf document. There is no SOP in place requiring the conversion to a pdf, but the laboratory analyst typically completes this task. Bench sheets must be converted to PDF after analysis so that data can not be edited. All reMarkable data is stored in an electronic cloud. In accordance with EPA guidelines, all data must be secured and the electronic system must include:

1. The software must be backed-up and not just reside on a local server (e.g., the Cloud).
2. It must be available at any time upon request.
3. There must be metadata that tracks all users so IDEM can see who created the data, inputted the data, edited the data, or deleted data.
4. Once the data is generated, it must be locked and secure. Changes should be controlled by a limited number of individuals (e.g., Lab Supervisor).
5. Any paper that is used (even if just to make a note), must be saved for a minimum of 3 years.

IDEM considers the reMarkable data that remains editable and without tracking abilities a violation of adequate laboratory data recordkeeping. IDEM notes that following input into the reMarkable electronic tablet, data is then transferred to a LIMS management system, which too would have the above requirements.

Additionally, recently, the server on which all data converted to pdf files failed. At the time of the inspection, it was identified that no pdf laboratory

bench sheets, calibration or temperature data or associated laboratory documentation was available for review. Staff are hoping the information can be recovered. The lack of virtually all laboratory records from May to October being available for inspection is considered a violation of Part I. B. 8 the permit.

Other Laboratory items noted:

1. You are not consistently meeting the 15 minute holding time for pH and DO testing. According to Standard Methods, analysis for these tests is required to be completed in 15 minutes.
2. You are not consistently meeting the required 0.0025 g filter residual for TSS testing. Please use enough sample, up to 1000 mL, to ensure this residual is met. If using the 1000 mL and the residual is not met, the requirements of the test have still been met.
3. Records/Reports was rated as unsatisfactory for the following:
 - A. Part I. B. 3 of the permit requires the permittee to submit monitoring reports postmarked no later than the 28th day of the month following each completed monitoring period. A records review indicated that required reports for October 2023, March 2024, and July 2024 were submitted between 5 to 10 weeks late. Please ensure all reports, including biomonitoring reports, are submitted by the 28th day of the following month.
 - B. A records review indicated that you are not consistently counting the correct number of effluent violations reported on the DMR. From February 2024 to September 2024, four of the eight months contained errors. Specifically, the February, March, April and May DMR reports are wrong. The miscounting of effluent violations was also brought to your attention in the March 4, 2024 inspection report. A correct accounting of the number of violations is detailed below. During the inspection, this problem was discussed at length. Staff input data into the laboratory tracking system, then into the LIMS laboratory system. The LIMS system then automatically inputs data into the MRO and DMR. There appear to be multiple features that do not function properly with this system. It appears that for some parameters, LIMS is not catching loading violations. Also, LIMS has blacked out the monthly average box for some parameters and using a different number for reporting. Staff rely solely on this system reporting accurate data. Staff must begin manually verifying this automated system until it can be relied on to report accurate data.

The incorrect reports noted above must be revised and resubmitted. In addition, the facility must identify if the reported monthly average data reported for 2024 is correct for all parameters and all months. If the data is incorrect, corrected data must be resubmitted. ***Please notify this inspector when all corrected reports have been submitted to CDX.***

Also, on the DMR, the Responsible Official needs to be listed as the Mayor of Kendallville and not the superintendent. This change does not affect the

ability of the superintendent to submit all reports on behalf of the City.

4. 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	Number
February	2024	003	TSS	4
February	2024	003	Ammonia Nitrogen	4
February	2024	003	Copper	2
February	2024	003	CBOD	1
March	2024	003	Dissolved Oxygen	1
March	2024	003	TSS	6
March	2024	003	Copper	4
March	2024	003	CBOD	1
April	2024	003	Ammonia Nitrogen	21
May	2024	003	Ammonia Nitrogen	8
June	2024	003	Dissolved Oxygen	1
July	2024	003	Phosphorus	1

During a March 3, 2024 inspection the records from October 2023 to January 2024 were reviewed. During that time, the facility experienced 13 ammonia violations. These violations were addressed in a March 7, 2024 Noncompliance Letter.

In addition to the above, please refer to the Self-Monitoring and Pretreatment areas of this report for items of concern.

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.

Effective immediately, IDEM is initiating a program strongly encouraging domestic wastewater utilities to perform cybersecurity vulnerability assessments, and to take actions to mitigate identified vulnerabilities and increase the cybersecurity resilience of Indiana's water sector. Utilities can choose any assessment tool appropriate for the water sector, but IDEM is highlighting the following websites for information and helpful vulnerability assessment tools made available from the U.S. EPA and the American Water Works Association: <https://www.epa.gov/waterresilience/epa-cybersecurity-water-sector> and <https://www.awwa.org/Resources-Tools/Resource-Topics/Risk-Resilience/Cybersecurity-Guidance>. IDEM will continue to share important updates on the cybersecurity of the water sector.

This information is being forwarded to the OWQ Enforcement Section for

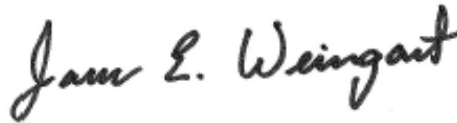
Kendallville WWTP

Inspection Date(s): 11/06/2024

consideration in conjunction with your Agreed Order, Case Nos. 2010-19158-W and 2020-27186-W.

Within 30 days of receipt of this letter, a written detailed response documenting correction of the concerns listed in items 1, 2, and 3 above and/or a plan for assuring future compliance must be submitted to this office. 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 Lynn Stackhouse at 317-691-0099 or by email at Lstack@idem.IN.gov. A copy of the NPDES Wastewater Facility Inspection Report is enclosed for your records.

Sincerely,

A handwritten signature in black ink that reads "James E. Weingart". The signature is written in a cursive, flowing style.

James E. Weingart, Director
Northern Regional Office

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0020656		Facility Type: Municipality		Facility Classification: Major		TEMPO AI ID III	
Date(s) of Inspection:		November 06, 2024					
Type of Inspection:		Compliance Evaluation Inspection					
Name and Location of Facility Inspected: Kendallville Wastewater Treatment Plant 501 West Wayne Street Kendallville IN 46755				Receiving Waters: Unnamed tributary to Henderson Lake		Permit Expiration Date: 6/30/2026	
County: Noble						Design Flow: 2.68MGD	
On Site Representative(s):							
First Name	Last Name	Title	Email	Phone			
Pat	Howell	Superintendent	phowell@kendallvillein.gov	260-302-6835			
Trevor	Hampshire	Pretreatment Supervisor	THampshire@kendallvillein.gov	260-349-8573			
Mel	Freeman	Maintenance and Collection System Supervisor	mfreeman@kendallvillein.gov	260-318-5111			
Krystal	Furlow	Laboratory	KFurlow@kendallvillein.gov				
Was a verbal summary of findings presented to the on-site representative? Yes							
Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:		
Patrick Howell	21278	IV	7-1-22	6-30-25	phowell@kendallvillein.gov		
Cyber Security Contact:							
Name: _____ Email: _____							
Responsible Official: The Honorable Lance Walters, Mayor 234 South Main Kendallville, Indiana 46755				Permittee: City of Kendallville Email: mayor@kendallvillein.gov 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)							
S	Receiving Waters	S	Facility/Site	M	Self-Monitoring	N	Enforcement
S	Effluent	S	Operation	S	Flow Measurement	M	Pretreatment
S	Permit	U	Maintenance	U	Laboratory	U	Effluent Limits Compliance
M	Collection System	S	Sludge Disposal	U	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 at the mouth of Henderson Lake. No concerns were noted.							
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?
- 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.
- N 5. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

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:

- N 1. CSO's were found to be adequately monitored and maintained.
- M 2. There were one reported maintenance-related (clogged or blocked lines) overflow events in last 12 months.
- S 3. There were no reported hydraulic (I&I) overflow events in last 12 months.
- N 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.
- S 7. Collection system maintenance activities appeared to be adequate.

Comments:

Collection System was rated as marginal. The facility reported one collection system overflow due to a force main break. The incident was properly reported to IDEM.

IDEM conducted a CSO level of control audit in 2023. Following the audit, IDEM informed Kendallville on how all future CSO MRO forms need to be completed. A follow up audit is planned in 2025 with the expectation that the MRO forms have been completed as directed by IDEM Wet Weather Section staff.

The Friendly Village, Holly Brook, PFG, Country Club, Waits Road, and Brillhart lift stations were evaluated at the time of inspection and all appeared to be operating properly. The Brillhart lift station was full of solids and in need of cleaning. The facility cleans all lift stations twice a year unless needed more frequently. The facility has not conducted the fall cleaning of lift stations to date. All 16 lift stations are physically checked once every two weeks unless problems occur. During the physical inspections, the facility documents the pump hours, cycle times (if equipped), and amps for each lift station on a lift station log sheet. All lift stations are monitored by an Omni-site alarm system that contacts personnel when problems occur. The Holly Brook lift station has an on-site generator that is tested once a week for use during power outages. All other lift stations have a quick connect for the facility's two portable generators. New pumps were installed at the Friendly Village lift station in the last year.

The facility's collection system maintenance consists of yearly preventative maintenance on sanitary sewers with problems areas being attended to more frequently. The entire sewer system is broken into several sections for preventative maintenance in order to keep track of sewer cleanings. The entire collection system is cleaned every two to three years. All lift station and sewer system maintenance activities appeared to be adequate at time of inspection

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 influent grit removal and mechanical screening, primary clarification, anoxic zone/activated sludge aeration system, secondary clarification, chemical phosphorus removal, UV disinfection (seasonal), and stair step post aeration. All units of treatment were in service at the time of the inspection.

Currently, the facility is nearing the completion of the installation of new headworks' slide gates and additional

diffusers in the aeration system. This will allow plant operators to utilize the collection system as storage during wet weather events. The additional diffuser project is expected to increase the aeration system's ability to treat higher loadings. This project is being completed as part of the City's Administrative Order on Consent with US EPA and will be completed by the end of 2024..

The WWTP superintendent submitted a request to IDEM on November 4, 2024 stating that he would like to take all primary clarifiers off-line. During the inspection, he reported that this was due to recent lower influent CBOD loadings and not necessarily due to current influent CBOD concentrations. The request also comes in ahead of the expected massive reduction of CBOD loadings following the start-up of the new Kraft-Heinz pretreatment system in early 2025. IDEM has this request under review at the time of the inspection. If plant operations support leaving the primary tanks off-line permanently, the superintendent stated he planned to explore the option of receiving Kraft-Heinz's anaerobic sludge directly into the primary clarifiers for final processing.

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:

All units of treatment appeared to be operated efficiently. The primary clarifiers had no significant floating debris or scum on the tanks. The aeration system consists of 4 anoxic zone/activated sludge tanks, three of which were in service. The anoxic zones have ORP meters and are providing some natural phosphorus removal. Good color and mixing was noted in both the anoxic zones and aeration system. The secondary clarifiers were settling well and the weirs were free of algae or scum. Historically, the facility has fed several chemicals daily to improve operations. At the time of this inspection, the only chemicals being fed were Phosphoric Acid to balance the high influent CBOD, alum for phosphorus removal and occasionally a settling polymer.

Sludge is wasted daily from both the primary and secondary clarifiers. The primary sludge is directed to an anaerobic digester and the secondary sludge is directed to aerobic digesters. Sludge wasting rates are adjusted when needed and at the direction of the plant superintendent. At the time of the inspection, 45,000 gallons of sludge was being wasted daily. Plant operators are currently thickening up the MLSS in anticipation of the colder weather months.

The superintendent stated that following the start-up of the Kraft-Heinz pretreatment system, he planned to operate aeration tank 1 as an EQ tank for use during wet weather and/or an industrial wastewater slug coming into the plant.

One concern noted by both IDEM and EPA was the excessive floating scum/debris buildup in the chlorine contact tank. It did not appear the scum/debris was discharging from the plant at the time of the inspection. This tank needs to be cleaned.

Maintenance:

- U 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 was rated as unsatisfactory due to an inadequate preventative maintenance plan/program and no current or historical documentation of maintenance that has been completed at the wastewater treatment plant. This is a violation of Part II. B. 1 of the permit which requires all facilities to be operated and maintained as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants. This maintenance must be documented.

In the past, the facility utilized an electronic maintenance program called JobCal. This program created work

orders and was a mechanism to track/store completed and planned maintenance but staff reported that the program had not been used or updated for some time. Recently, the contract with JobCal was severed by treatment plant management and no new preventative maintenance program was created or implemented. During the inspection, it was identified that all historical JobCal information, while admittedly by staff as not up to date, was lost.

A Preventative Maintenance Plan must be developed for all units of treatment. The documentation must include both a preventative maintenance schedule for units of treatment, when said maintenance was completed, and any reactionary maintenance for mechanical failure/problems.

Of concern to IDEM is that one of the four influent pumps was out of service and has been since June. Staff reported it is in for repairs. The superintendent stated if another influent pump fails, the plant will not have the pumping capacity to reach peak flows during a wet weather event.

Sludge Disposal:

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

Comments:

Sludge is wasted daily from both the primary and secondary clarifiers. All sludge is dewatered with a screw/plate press and hauled off site for disposal in a landfill. On average, 350 tons of sludge is hauled monthly.

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.
- N 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.
- M 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.
- M 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.
- S 6. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were found to be met.

Comments:

Self-Monitoring was rated as marginal. The permit requires 4 daily DO samples to be obtained and averaged. Three of these samples are collected by the operating staff and they only report the analysis time. To ensure the DO samples are completed in the required 15 minute holding time, both the collection time and analysis times are required.

Influent, primary effluent and final effluent samples are collected with an automatic sampler.

In 2023, the facility failed a WET test. A TRE was completed and all testing indicated No Toxicity.

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. The influent and effluent flow meters were calibrated in July 2024.

Laboratory:

The following laboratory records were reviewed:

CBOD Bench Sheets	TSS Bench Sheets	Ammonia Bench Sheets
	Phos. Bench Sheets	D. O. 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.

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

Contract Lab Information

CF Environmental - metals testing	Ft. Wayne, IN
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Comments:

Laboratory was rated as unsatisfactory. Part I. B. 6 of the NPDES permit requires the permittee to record specific information as described, for each measurement or sample taken pursuant to the requirements of this permit. In addition, Part I. B. 8 of the permit requires the permittee to retain, for a minimum of three years, all records and information resulting from the monitoring activities required by the permit, including all records of analyses performed.

In late April 2024, the facility began utilizing an electronic laboratory bench sheet using a computer tablet to input data. This system is called reMarkable. Laboratory staff input each step of testing for all parameters, along with all laboratory temperatures and calibrations. The system has read-only access for all treatment operators, but is editable after the analysis is completed by laboratory staff and management. The data remains editable until staff manually convert the data to a pdf document. There is no SOP in place requiring the conversion to a pdf, but the laboratory analyst typically completes this task. Bench sheets must be converted to PDF after analysis so that data can not be edited. All reMarkable data is stored in an electronic cloud. In accordance with EPA guidelines, all data must be secured and the electronic system must include:

- The software must be backed-up and not just reside on a local server (e.g., the Cloud).
- It must be available at any time upon request.
- There must be metadata that tracks all users so IDEM can see who created the data, inputted the data, edited the data, or deleted data.
- Once the data is generated, it must be locked and secure. Changes should be controlled by a limited number of individuals (e.g., Lab Supervisor).
- Any paper that is used (even if just to make a note), must be saved for a minimum of 3 years.

IDEM considers the reMarkable data that remains editable and without tracking abilities a violation of adequate laboratory data recordkeeping. IDEM notes that following input into the reMarkable electronic tablet, data is then transferred to a LIMS management system, which too would have the above requirements.

Additionally, recently, the server on which all data converted to pdf files failed. At the time of the inspection, it was identified that no pdf laboratory bench sheets, calibration or temperature data or associated laboratory documentation was available for review. Staff are hoping the information can be recovered. The lack of virtually all laboratory records from May to October being available for inspection is considered a violation of Part I. B. 8 the permit.

Other Laboratory items noted:

- You are not consistently meeting the 15 minute holding time for pH and DO testing. According to Standard Methods, analysis for these tests is required to be completed in 15 minutes.
- You are not consistently meeting the required 0.0025 g filter residual for TSS testing. Please use enough sample, up to 1000 mL, to ensure this residual is met. If using the 1000 mL and the residual is not met, the

requirements of the test have still been met.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of February 2024 to September 2024 were reviewed as part of the inspection.

S 1. All facility records for the period including the previous three years were available for review.

U 2. DMRs and MROs were found to be completed properly and accurately including:

- a. "No Ex" column was accurate.
- b. Signatory requirements were met.
- c. Reports were prepared by or under the direction of a certified operator.

S 3. Bypass and Noncompliance reporting were found to be adequate.

Comments:

Records/Reports was rated as unsatisfactory for the following:

- A. Part I. B. 3 of the permit requires the permittee to submit monitoring reports postmarked no later than the 28th day of the month following each completed monitoring period. A records review indicated that required reports for October 2023, March 2024, and July 2024 were submitted between 5 to 10 weeks late. Please ensure all reports, including biomonitoring reports, are submitted by the 28th day of the following month.
- B. A records review indicated that you are not consistently counting the correct number of effluent violations reported on the DMR. From February 2024 to September 2024, four of the eight months contained errors. Specifically, the February, March, April and May DMR reports are wrong. The miscounting of effluent violations was also brought to your attention in the March 4, 2024 inspection report. A correct accounting of the number of violations is detailed below. During the inspection, this problem was discussed at length. Staff input data into the laboratory tracking system, then into the LIMS laboratory system. The LIMS system then automatically inputs data into the MRO and DMR. There appear to be multiple features that do not function properly with this system. It appears that for some parameters, LIMS is not catching loading violations. Also, LIMS has blacked out the monthly average box for some parameters and using a different number for reporting. Staff rely solely on this system reporting accurate data. Staff must begin manually verifying this automated system until it can be relied on to report accurate data.

The incorrect reports noted above must be revised and resubmitted. In addition, the facility must identify if the reported monthly average data reported for 2024 is correct for all parameters and all months. If the data is incorrect, corrected data must be resubmitted. *Please notify this inspector when all corrected reports have been submitted to CDX.*

Also, on the DMR, the Responsible Official needs to be listed as the Mayor of Kendallville and not the superintendent. This change does not affect the ability of the superintendent to submit all reports on behalf of the City.

Enforcement:

N 1. Agreed Order and/or Compliance Plan milestones have been met.

Comments:

The violations included in IDEM's Agreed Orders 2010-19158-W, 2014-22286-W, 2020-27186-W have been referred to the U.S. EPA. The U.S. EPA issued an Administrative Order on Consent in this matter, which became effective January 9, 2023. The status of the Administrative Order on Consent will be evaluated by U.S. EPA staff under a separate report.

Pretreatment:

S 1. No evidence of interference from industrial or other sources of toxic substances was noted.

M 2. For both Delegated and Non-Delegated pretreatment programs:

- a. Industrial or commercial dischargers were found to be regulated as required.
- b. 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:

- a. Does the POTW provide written permission to haulers?
- b. Does the POTW obtain samples from each hauled waste load and retain them for at least 48 hours?
- c. Does the POTW retain records of each load?

Comments:

Pretreatment is rated as marginal. The facility implements a Delegated Pretreatment Program. In 2024, hard SUO limits were developed in lieu of surcharge limitations. An EPA evaluation of the SUO indicated that this document incorporated hard limits for BOD but the industrial user permits issued to local industries contained CBOD testing. Staff plan to investigate and address this concern.

Kendallville WWTP

Inspection Date(s): 11/06/2024

As noted in the Laboratory area, many pretreatment records are stored in an electronic cloud and not converted to permanent pdf files. These cannot be considered adequate recordkeeping as the documents remain editable and are not securely backed up electronically. Additionally, industrial pH testing analyst is not documenting both the collection time and analysis time to ensure the 15 minute holding time is being met.

Effluent Limits Compliance:

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

DMRs for the period of February 2024 to September 2024 were reviewed as part of the inspection.

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

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	Number
February	2024	003	TSS	4
February	2024	003	Ammonia Nitrogen	4
February	2024	003	Copper	2
February	2024	003	CBOD	1
March	2024	003	Dissolved Oxygen	1
March	2024	003	TSS	6
March	2024	003	Copper	4
March	2024	003	CBOD	1
April	2024	003	Ammonia Nitrogen	21
May	2024	003	Ammonia Nitrogen	8
June	2024	003	Dissolved Oxygen	1
July	2024	003	Phosphorus	1

Comments:

During the March 3, 2024 inspection the records from October 2023 to January 2024 were reviewed. During that time, the facility experienced 13 ammonia violations. These violations were addressed in a March 7, 2024 Noncompliance Letter.

IDEM REPRESENTATIVE

Inspector Name:

Lynn Stackhouse

Email:

lstack@idem.IN.gov

Phone Number:

317-691-0099

Other staff participating in the inspection:

Name(s)

Aaron Deeter - IDEM

Valerie Dooling - U.S. EPA

Phone Number(s)

IDEM MANAGER REVIEW

IDEM Manager:

James E. Weingart

Date:

11/8/2024