December 27, 2019

VIA ELECTRONIC MAIL

Mr. Doug Brock, VP of Operations
Indiana American Water Co. – Merom
51 Locust St.
Terre Haute, IN 47807

Dear Mr. Brock:

Re: NPDES Permit No. IN0061328
Draft Permit Modification
Indiana American Water Co. – Merom
Merom, IN - Sullivan County

Your request for a permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. Enclosed is a copy of the draft permit modification.

Pursuant to IC 13-15-5-1, IDEM will publish a general notice in the newspaper with the largest general circulation within the above county. A 30-day comment period is available in order to solicit input from interested parties, including the general public.

Please review this draft permit modification and associated documents carefully to become familiar with the proposed terms and conditions. Comments concerning the draft permit modification should be submitted in accordance with the procedure outlined in the enclosed public notice form. We suggest that you meet with us to discuss major concerns or objections you may have with the draft permit modification.

Questions concerning this draft permit modification may be addressed to Megan Miller of my staff, at 317-233-1854 or mmiller@idem.in.gov.

Sincerely,

Nikki Gardner, Chief
Industrial NPDES Permits Section
Office of Water Quality

Enclosures
STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AMENDED AUTHORIZATION TO DISCHARGE UNDER THE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., the "Act"), and IDEM's permitting authority under IC 13-15, INDIANA AMERICAN WATER - MEROM is authorized to discharge from a public water supply treatment facility located at 2695 S. Third Street in Merom, Indiana to receiving waters identified as an unnamed tributary to the Wabash River in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

The permit, as issued on May 27, 2016 is hereby amended, as contained herein. The amended provisions shall become effective ________________. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit may be revoked for the nonpayment of applicable fees in accordance with IC 13-18-20.

This permit and the authorization to discharge, as amended, shall expire at midnight October 31, 2021. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Indiana Department of Environmental Management no later than 180 days prior to the date of expiration.

Issued on _________________ for the Indiana Department of Environmental Management.

Nikki Gardner, Chief
Industrial NPDES Permit Section
Office of Water Quality
PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. The permittee is authorized to discharge from the outfall listed below in accordance with the terms and conditions of this permit. The permittee is authorized to discharge from Outfall 001, located at Latitude 39° 2’ 59.6”, Longitude -87° 33’ 55.7”. The discharge is limited to filter backwash wastewater. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to entry into the unnamed tributary to the Wabash River. Such discharge shall be limited and monitored by the permittee as specified below:

**DISCHARGE LIMITATIONS [2][6]**

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Monthly Average</th>
<th>Monthly Maximum</th>
<th>Units</th>
<th>Daily Average</th>
<th>Daily Maximum</th>
<th>Units</th>
<th>Measurement Frequency</th>
<th>Sample Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flow</td>
<td>-</td>
<td>-</td>
<td>MGD</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1 X Quarterly[3]</td>
<td>24 Hour Total</td>
</tr>
<tr>
<td>Total Iron[1]</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.8</td>
<td>4.1</td>
<td>mg/l</td>
<td>1 X Quarterly[3]</td>
<td>Grab</td>
</tr>
<tr>
<td>TSS</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>20.0</td>
<td>40.0</td>
<td>mg/l</td>
<td>1 X Quarterly[3]</td>
<td>Grab</td>
</tr>
<tr>
<td>TRC[4][5]</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.01</td>
<td>0.02</td>
<td>mg/l</td>
<td>1 X Weekly</td>
<td>Grab</td>
</tr>
</tbody>
</table>

Table 2

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Daily Average</th>
<th>Daily Maximum</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>pH[7]</td>
<td>6.0</td>
<td>9.0</td>
<td>s.u.</td>
</tr>
</tbody>
</table>

[1] The permittee shall measure and report the identified metal as total recoverable metal.


[3] Samples shall be taken once at any time during each of the four annual quarters:

(A) January-February-March;
(B) April-May-June;
(C) July-August-September; and
(D) October-November-December.

For quarterly monitoring, in the first quarter for example, the permittee may conduct sampling within the month of January, February or March. The result from this reporting timeframe shall be reported on the March DMR, regardless of which of the months within the quarter the sample was taken.
The water quality based effluent limit (WQBEL) for TRC is less than the limit of quantitation (LOQ) as specified in footnote [5]. Compliance with this permit will be demonstrated if the effluent concentrations measured are less than the LOQ.

If the measured concentration of TRC is greater than the water quality based effluent limitations and above the respective LOD specified in footnote [5] in any three (3) consecutive analyses, or any five (5) out of nine (9) analyses, then the discharger shall:

1. Determine the source of the parameter through an evaluation of sampling techniques, analytical/laboratory procedures, and waste streams (including internal waste streams); and re-examine the chlorination/dechlorination procedures.

2. The sampling and analysis for TRC shall be increased to 1 X Weekly and remain at this increased sampling frequency until:
   a. The increased sampling frequency for TRC has been in place for at least nine (9) weeks,
   b. At least nine (9) samples have been taken under this increased sampling frequency; and
   c. The measured concentration of TRC is less than the LOD specified in footnote [5] in at least seven (7) out of the nine (9) most recent analyses.

The following EPA approved test methods and associated LODs and LOQs are to be used in the analysis of the effluent samples. Alternative methods may be used if first approved by IDEM and EPA, if applicable.

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Test Method</th>
<th>LOD</th>
<th>LOQ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlorine</td>
<td>4500-Cl-D-2000, E-2000 or 4500-Cl-G-2000</td>
<td>0.02 mg/l</td>
<td>0.06 mg/l</td>
</tr>
</tbody>
</table>

**Case-Specific LOD/LOQ**

The permittee may determine and use a case-specific LOD or LOQ using the analytical method specified above, or any other analytical method which is approved by the Commissioner, and EPA if applicable, prior to use. The permittee may determine and use a case-specific LOD or LOQ using the analytical method specified above, or any other analytical test method which is approved by the Commissioner, and EPA if applicable, prior to use. The LOD shall be derived by the procedure specified for method detection limits contained in 40 CFR Part 136, Appendix B, and the LOQ shall be set equal to 3.18 times the LOD. Other methods may be used if first approved by the Commissioner.
[6] In the event that a new water treatment additive is to be used that will contribute to this Outfall, or changes are to be made in the use of water treatment additives, including dosage, the permittee must apply for and receive approval from IDEM prior to such discharge. Discharges of any such additives must meet Indiana water quality standards. The permittee must apply for permission to use water treatment additives by completing and submitting State Form 50000 (Application for Approval to Use Water Treatment Additives) currently available at: http://www.in.gov/idem/5157.htm

[7] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.
<table>
<thead>
<tr>
<th>Permittee:</th>
<th>Indiana American Water - Merom</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>51 Locust St.</td>
</tr>
<tr>
<td></td>
<td>Terre Haute, IN 47807</td>
</tr>
<tr>
<td>Permit Information:</td>
<td>Permit Number: IN0061328</td>
</tr>
<tr>
<td></td>
<td>Expiration Date: October 31, 2021</td>
</tr>
<tr>
<td>Facility Contact:</td>
<td>Carrie Lowe</td>
</tr>
<tr>
<td></td>
<td>(812) 232-1400, <a href="mailto:carrie.lowe@amwater.com">carrie.lowe@amwater.com</a></td>
</tr>
<tr>
<td>Facility Location:</td>
<td>2695 S 3rd St</td>
</tr>
<tr>
<td></td>
<td>Merom, IN 47861</td>
</tr>
<tr>
<td></td>
<td>Sullivan County</td>
</tr>
<tr>
<td>Receiving Stream:</td>
<td>Unnamed Tributary to the Wabash River</td>
</tr>
<tr>
<td>GLI/Non-GLI:</td>
<td>Non-GLI</td>
</tr>
<tr>
<td>Proposed Permit Action:</td>
<td>Modification</td>
</tr>
<tr>
<td>Date Application Received:</td>
<td>November 7, 2019</td>
</tr>
<tr>
<td>Source Category:</td>
<td>NPDES Minor – Industrial (Public Water Supply)</td>
</tr>
<tr>
<td>Permit Writer:</td>
<td>Megan Miller, Environmental Manager</td>
</tr>
<tr>
<td></td>
<td>(317) 233-1854</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:mmiller@idem.in.gov">mmiller@idem.in.gov</a></td>
</tr>
</tbody>
</table>
# Table of Contents

1.0 Introduction .................................................................................................. 3  
2.0 Facility Description ...................................................................................... 3  
  2.1 General ........................................................................................................ 3  
  2.2 Outfall Location ........................................................................................ 4  
3.0 PERMIT MODIFICATION ............................................................................... 4  
  3.1 Modification Request .................................................................................. 4  
  3.2 IDEM’s Proposed Modification ................................................................... 5  
  3.3 Antidegradation .......................................................................................... 5  
  3.4 Spill Response and Reporting Requirement .............................................. 5  
  3.5 Permit Processing/Public Comment ............................................................. 6
1.0 INTRODUCTION

The Federal Water Pollution Control Act (more commonly known as the Clean Water Act), as amended, (Title 33 of the United States Code (U.S.C.) Section 1251 et seq.), requires an NPDES permit for the discharge of pollutants into surface waters. Furthermore, Indiana law requires a permit to control or limit the discharge of any contaminants into state waters or into a publicly owned treatment works. This proposed permit action by IDEM complies with and implements these federal and state requirements.

In accordance with Title 40 of the Code of Federal Regulations (CFR) Section 124.7, as well as Title 327 of the Indiana Administrative Code (IAC) 327 Article 5-3-7, a Statement of Basis, or Briefing Memo, is required for certain NPDES permits. This document fulfills the requirements established in these regulations. This Briefing Memo was prepared in order to document the factors considered in the development of NPDES Permit effluent limitations. The technical basis for the Briefing Memo may consist of evaluations of promulgated effluent guidelines, existing effluent quality, receiving water conditions, Indiana water quality standards-based wasteload allocations, and other information available to IDEM. Decisions to award variances to Water Quality Standards or promulgated effluent guidelines are justified in the Briefing Memo where necessary. This Briefing Memo also identifies the modified pages of the permit as issued on May 27, 2016 and effective on November 1, 2016.

2.0 FACILITY DESCRIPTION

2.1 General

The Indiana Department of Environmental Management received a National Pollutant Discharge Elimination System (NPDES) Permit modification application from Indiana American Water – Merom on November 7, 2019. The current five year permit was issued with an effective date of November 1, 2016 in accordance with 327 IAC 5-2-6(a).

Indiana American Water – Merom is classified under Standard Industrial Classification (SIC) Code 4941 – Water Supply. The facility distributes water for sale for domestic, commercial, and industrial use.

A map showing the location of the facility has been included as Figure 1.
2.2 Outfall Location

OUTFALL 001
Latitude: 39° 2’ 59.6”
Longitude: -87° 33’ 55.7”

3.0 PERMIT MODIFICATION

3.1 Modification Request

The facility recently discovered that a floor drain is connected to the backwash basins. Two plant effluent analyzers that are continuously flowing finished potable water are connected to the floor drain. Residual chlorine was detected in the discharge from the Outfall pipe when a new effluent analyzer was installed. Discharge lines are to be set up to flow into a funnel that will hold dechlorination tablets that the operators will check and keep filled. Due to the potential for Total Residual Chlorine to be in the discharge, water quality-based effluent limitations are necessary and are included in the permit.
3.2 IDEM’s Proposed Modification

IDEM has included Total Residual Chlorine limitations for Outfall 001 to adequately ensure compliance with Indiana’s Water Quality Standards; please refer to pages 2a, 2b, and 2c of 23 of the permit. The limitations for TRC are 0.01 mg/l monthly average and 0.02 mg/l daily maximum. Compliance with this permit will be demonstrated if the effluent concentrations measured are less than the LOQ of 0.06 mg/l.

3.3 Antibacksliding

Pursuant to 327 IAC 5-2-10(a)(11), unless an exception applies, a permit may not be renewed, reissued or modified to contain effluent limitations that are less stringent than the comparable effluent limitations in the previous permit. None of the limits included in this permit are less stringent than the comparable effluent limitations in the previous permit, therefore, backsliding is not an issue in accordance with 327 IAC 5-2-10(a)(11).

3.4 Antidegradation

Indiana’s Antidegradation Standards and Implementation procedures are outlined in 327 IAC 2-1.3. The antidegradation standards established by 327 IAC 2-1.3-3 apply to all surface waters of the state. The permittee is prohibited from undertaking any deliberate action that would result in a new or increased discharge of a bioaccumulative chemical of concern (BCC) or a new or increased permit limit for a regulated pollutant that is not a BCC unless information is submitted to the commissioner demonstrating that the proposed new or increased discharge will not cause a significant lowering of water quality, or an antidegradation demonstration submitted and approved in accordance 327 IAC 2-1.3-5 and 2-1.3-6.

This permit includes new or increased permit limitations for TRC. In accordance with 327 IAC 2-1.3-1(b), the new or increased permit limitations are not subject to the Antidegradation Implementation Procedures in 327 IAC 2-1.3-5 and 2-1.3-6 as the new or increased permit limitations are not the result of a deliberate activity taken by the permittee.

3.5 Spill Response and Reporting Requirement

Reporting requirements associated with the Spill Reporting, Containment, and Response requirements of 327 IAC 2-6.1 are included in Part II.B.2.(d), Part II.B.3.(c), and Part II.C.3. of the NPDES permit. Spills from the permitted facility meeting the definition of a spill under 327 IAC 2-6.1-4(15), the applicability requirements of 327 IAC 2-6.1-1, and the Reportable Spills requirements of 327 IAC 2-6.1-5 (other than those meeting an exclusion under 327 IAC 2-6.1-3 or the criteria outlined below) are subject to the Reporting Responsibilities of 327 IAC 2-6.1-7.
It should be noted that the reporting requirements of 327 IAC 2-6.1 do not apply to those discharges or exceedances that are under the jurisdiction of an applicable permit when the substance in question is covered by the permit and death or acute injury or illness to animals or humans does not occur. In order for a discharge or exceedance to be under the jurisdiction of this NPDES permit, the substance in question (a) must have been discharged in the normal course of operation from an outfall listed in this permit, and (b) must have been discharged from an outfall for which the permittee has authorization to discharge that substance.

3.6 Permit Processing/Public Comment

Pursuant to 327 IAC 5-3-9 and 327 IAC 5-3-12, IDEM is required to public notice this draft permit. For this public notice, IDEM will publish a general notice in the newspaper with the largest general circulation within the county that this facility is located. A 30-day comment period is provided to solicit input from interested parties, including the general public. Comments concerning the draft permit should be submitted in accordance with the procedure outlined in the enclosed public notice form.
The Office of Water Quality proposes the following NPDES DRAFT PERMIT:

MINOR – MODIFICATION

MEROM MUNICIPAL WATER WORKS PWS, Permit No. IN0061328, SULLIVAN COUNTY, 2695 S. 3rd St., Merom, IN. This modification request is because the TRC limit was added to parameters after finding residual chlorine in effluent. Permit Manager: Megan Miller, 317/233-1854 or mmiller@idem.in.gov. Published in the Sullivan Daily Times.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see: Public Participation Guide: http://www.in.gov/idem/5474.htm or Citizens’ Guide to IDEM: https://www.in.gov/idem/6900.htm.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.