Indiana Department of Environmental Management

Indiana Water Environment Association – Government Affairs Committee

Meeting Minutes

Indiana Government Center North 12th Floor – Conference Room E

January 16, 2019

1:00 PM – 2:30 PM

Agenda:

1. Introductions
    a. Martha Clark-Mettler (IDEM), Paul Higginbotham (IDEM), Jason House (IDEM), Mark Stanifer (IDEM), Camille Meiners (SRF), Craig Williams (Angola/IWEA), Richard Radcliff (BLN/IWEA), Brian Neilson (HWC/IWEA), Tim Healy (Greeley-Hansen/IWEA), Larry Kane (BGD/IWEA), Brandi Wallace (Fort Wayne/IWEA), Andrea Alexander South Bend/IWEA), Cecil Whitaker (Whitaker Engineering/IWEA), and Brady Dryer (CEI/IWEA).
2. IFA-SRF Update
    a. General Funding Update
        i. January 1, 2019 represents the "bypass" period whereby projects are funded on a first come, first serve basis.
        ii. New interest rates out January 1, 2019 and are available for review.
        iii. Spring 2019 pool funding – only wastewater, no drinking water projects.
        iv. PERs due by June 15, 2019.
        v. 35 Year Financing for pipes (no tanks) is available.
        vi. 21 Asset Management Plan Grants have been issued for small communities. Each grant $25K or less.
        vii. Green Project Reserve (GPR) mentioned as beneficial.
        viii. Cybersecurity requirements also generally discussed.
3. Total Nitrogen Monitoring Notification for Major (≥ 1.0 MGD) Municipal Dischargers
    a. IDEM issued notification email (attached) on December 3, 2018.
    b. EPA Call to Action noted as driver for IDEM to implement:

        https://www.epa.gov/nutrient-policy-data/renewed-call-action-reduce-nutrient-pollution-and-support-incremental-actions

   c. No Limit or Criteria currently in place in Indiana.
   d. Approximately 12 facilities to be impacted by new requirement in 2019.
   e. Total N Monitoring applied for facilities required to submit NPDES Permit renewal applications or modification after January 1, 2019.
   f. Frequently Asked Questions (FAQ) sheet to be issued by IDEM OWQ (attached).
4. EPA POTW Secondary Treatment Questionnaire Status
   a. No update provided and thought questionnaire to be issued already.
   b. 14,000 to 15,000 utilities to eventually receive questionnaire.
5. Water Quality Criteria for Metals Status
   a. Moving forward, albeit slowly.
   b. Selenium has caused delays – mostly impacts Coal energy dischargers.
   c. IDEM developing approach to address.
   d. Rule may require 3rd Final Notice
6. Ohio River Sanitation Commission (ORSANCO) Water Quality Standards (WQSs) Review
   a. Plan to eliminate ORSANCO Water Quality Standards decision tabled in October 2018.
   b. Divergence from approach due to benefit of state flexibility.
   c. Potential state backsliding issues if ORSANCO WQSs eliminated.
   d. ORSANCO Specific requirements for municipal sanitary permittees – year-round disinfection and Acute Ammonia Criteria.
7. 2012 RWQC Update
   a. IDEM internal discussions stalled.
   b. 10% exceedance allowance is believed by IDEM to be problematic for implementation.
   c. IDEM working on simplified approach to rule revision with intent to reduce need for Use Attainability Analysis (UAAs) (approximately 20 communities).
   d. EPA has not reviewed Draft Rule Change and IWEA GAC to be allowed to review once available.
   e. Intent of rule change also to provide compliance assurance for those communities seeking compliance through IDEM OWQ Non-Rule Policy Document (NPD) Water-016: CSO Treatment Facilities.
8. Compliance/Enforcement Updates
   a. Increase compliance issues with semi-public WWTPs.
   b. 2018 enforcement 3 times previous year totals.

c. Many enforcement referrals from Drinking Water Branch for Revise Total Coliform Rule (RTCR) infractions.
d. As part of the Phase 2 – E-Reporting Rule, Whole Effluent Toxicity Test results must now be entered into NetDMR. IDEM conducting outreach assistance.
e. Early Warning Sewer Ban reviews, notifications, and reminders ongoing. Latest list attached.
f. IDEM now conducting collection system inspections.

9. Operator Certification Rule Work Group Update
    a. 2018 meetings with Work Group complete
    b. Revisions sent to Rules group for review and processing.
    c. Timing of public notice, etc. unknown.
    d. A 2018 Operator Certification exam 50% passing rate was generally discussed.
10. Operator Exam Test Review (at locations other than IDEM Downtown Indy Office)
    a. Tests are now available for review at the following offices:
        i. Northern Regional Office – South Bend
        ii. Northwest Regional Office – Valparaiso
        iii. Southeast Regional Office – Brownstown
        iv. Southwest Regional Office – Petersburg
    b. Appointments must be made to ensure that materials are available.
11. MS4 Program Update
    a. Work Group Activities ongoing.
    b. Meeting on January 16, 2019.
12. Construction Site Run-Off General Permit Status
    a. No formal update provided.
    b. To be adopted concurrent with MS4 General Permit
13. 2019 IDEM Initiatives & Legislative
    a. House Bill 1278: Various Environmental Matters was discussed as an IDEM bill to allow electronic submittal of certain documents.
    b. Senate Bill 592: Excess Liability Trust Fund Claims was mentioned as another IDEM bill.
    c. House Bill 1001: State Budget was discussed as language was to be included to allow IDEM to pursue fees through the Environmental Rules Board.

From: HOUSE, JASON

To: abutcher@cleanthestream.com; chris.gach@cityoffortwayne.org; don.papai@huntertown.org; huntertownsuperintendent@gmail.com; don.papai@huntertown.org; kreeves@columbusutilities.org; rduckworth@columbusutilities.org; sblack5965@aol.com; sblackwell.plu@gmail.com; hcwwtp@att.net; gjones@hartfordcity.net; hcwwtp@att.net; dscott@lebanon-utilities.com; bwaples@lebanon-utilities.com; dscott@lebanon-utilities.com; banker@indy.rr.com; scot@ctrwd.org; dpowers@whitestown.in.gov; bcook@zionsville-in.gov; dickvansickle@yahoo.com; delphiwwtp@gmail.com; sthoms@townofclarksville.com; mmeyer@cityofjeff.net; lashack@cityofjeff.net; kwright@sellersburg.org; wwtp@brazil.in.gov; billyg@brazil.in.gov; bdavis@fmu-in.com; washwwtp@washingtonin.us; bneyer@sdrsd.org; jsmith@cityofgreensburg.com; EASchroeder@ci.auburn.in.us; drlochner@ci.auburn.in.us; tedwwtp@butler.in.us; wwtp@garrettindiana.us; jcbarlow@msdeng.com; crjones@msdeng.com; mkemp@huntingburg-in.gov; wastewater@huntingburg.org; ehollinden@ci.jasper.in.us; jwwlab@ci.jasper.in.us; laura.kolo@coei.org; jimkerezman@goshencity.com; nappaneewastewater@nappanee.org; wwtp@connersvilleutilities.com; rshoemaker@connersvilleutilities.com; cconrad@cityofnewalbany.com; rsartell@cityofnewalbany.com; rjobst@batesvilleindiana.us; wastewater@rochester.in.us; wwtp@rochester.in.us; billeubanks@frontier.com; mustangconv65@eiwifi.com; rshrader@marionutilities.com; sphegley@cityoflinton.com; ccarter@carmel.in.gov; jkleinsmith@carmel.in.gov; redgemon@citizensenergygroup.com; rhigginbotham@citizensenergygroup.com; rhigginbotham@citizensenergygroup.com; twatson@noblesville.in.us; Khutson@noblesville.in.us; dscheiter@greenfieldin.org; dscheiter@greenfieldin.org; redgemon@citizensenergygroup.com; corydonww2@corydon-in.gov; Corydonww3@corydon-in.gov; corydonww2@corydon-in.gov; kdillon@brownsburg.org; jcrisp@danvilleindiana.org; lepearson@aquaamerica.com; kftansy@aquaamerica.com; flpaul@aquaamerica.com; mgillespie@astburygroup.com; mgillespie@astburygroup.com; jcastetter@town.plainfield.in.us; sschutte@astburygroup.com; ccooper@cityofkokomo.org; annette.carroll@huntington.in.us; mhosier@fv-operations.com; rhamilton@seymourwwtp.com; wastewater@cityofrensselaerin.com; jlockridge@cityofrensselaerin.com; bclayton@thecityofportland.net; utilitymanager@madison-in.gov; wpcfsupt@madison-in.gov; wpcfsupt@madison-in.gov; nvwater@gmail.com; rvaught@northvernon-in.gov; breynolds@townofbargersville.org; ggiles98541@sbcglobal.net; rlittleton@franklin.in.gov; jmoore@vinutilities.com; robin.merchant@stservices.com; lagwwtp@ligtel.com; cprevis@crownpoint.in.gov; jdzurovcak@townofdyer.com; ncardona@eastchicago.com; woodard@hammondsd.com; mcox@cityofhobart.org; tkingsland@cityofhobart.org; mcox@cityofhobart.org; tkingsland@cityofhobart.org; mcox@cityofhobart.org; tkingsland@cityofhobart.org; mcox@cityofhobart.org; tkingsland@cityofhobart.org; wwtp@lowell.net; jgorman@schererville.org; jjackson@cityoflaporte.com; slehman@mcsan.org; mmilatovic@mcsan.org; slehman@mcsan.org; bedfordwwtp@comcast.net; 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leslie.day@emcstl.com; utilities@cityofrushville.in.gov; leslie.day@emcstl.com; utilities@cityofrushville.in.gov; utilities@cityofrushville.in.gov; utilities@cityofrushville.in.gov; wastewater@c3bb.com; combsjb@gmail.com; befix@cityofshelbyvillein.com; befix@cityofshelbyvillein.com; rluthytsc@psci.net; rluthytsc@psci.net; rluthytsc@psci.net; cwilliams@angolain.org; wwtp@angolain.org; cwilliams@angolain.org; wwtp@angolain.org; cwilliams@angolain.org; wwtp@angolain.org; kkopec@mishawaka.in.gov; agreek@southbendin.gov; kthompso@southbendin.gov; asu-inc@hotmail.com; asu-inc@hotmail.com; btalley@lafayette.in.gov; dhenderson@westlafayette.in.gov; twtpsup@tds.net; cbullock@ewsu.com; cbullock@ewsu.com; Lawson, Harry; cbullock@ewsu.com; kjkolb@ewsu.com; Lawson, Harry; cbullock@ewsu.com; cbullock@ewsu.com; wmwoperator@yahoo.com; scott@clintonindiana.org; wmwoperator@yahoo.com; wmwoperator@yahoo.com; wmwoperator@yahoo.com; scott@clintonindiana.org; scott@clintonindiana.org; wastewater@terrehaute.in.gov; wastewater@terrehaute.in.gov; debbie.padgett@terrehaute.in.gov; nmanchesterwwtp@hotmail.com; cwgarber@manchester.edu; nmanchesterwwtp@hotmail.com; cwgarber@manchester.edu; bgray10@cinergymetro.net; bgray10@cinergymetro.net; jill.carr@veolia.com; pacew@earthlink.net; jill.carr@veolia.com; pacew@earthlink.net; pacew@earthlink.net; jill.carr@veolia.com; chandlerwwtf@townofchandler.org; lkey@newburgh-in.gov; lkey@newburgh-in.gov; lkey@newburgh-in.gov; lkey@newburgh-in.gov; lkey@newburgh-in.gov; psmoker@richmondindiana.gov; torrill@richmondindiana.gov; psmoker@richmondindiana.gov; torrill@richmondindiana.gov; torrill@richmondindiana.gov; psmoker@richmondindiana.gov; torrill@richmondindiana.gov; wastewater@ci.bluffton.in.us; wastewater@monticelloin.gov; mcook@columbiacity.net; Guinn, Jeff; rvaught@northvernon-in.gov

Cc:	Dittmer, Jerry; VOSS, LEIGH; Higginbotham, Paul; CLARK METTLER, MARTHA; Brady Dryer; s.killion@gaiconsultants.com
Subject:	Frequently Asked Questions: Data Collection for Total Nitrogen for Major Sanitary Dischargers
Date:	Friday, February 8, 2019 10:52:34 AM
Attachments:	image003.png Frequently Asked Questions - total nitrogen monitoring.pdf

Good morning,

IDEM has received questions concerning the data collection of total nitrogen for major sanitary dischargers email, which was sent to impacted permittees in December 2018. IDEM has collected these questions and has formulated a Frequently Asked Questions (FAQ) document to answer those questions. Please refer to the attached FAQ document.

If you have further questions, please feel free to contact the Office of Water Quality's Permits Branch.

Best,

Jason House
Indiana Department of Environmental Management
Office of Water Quality - Permits Branch
100 N. Senate Avenue, Mail Code 65-42
Indianapolis, IN 46204
Phone: 317/233-0470
Toll Free: 1-800/451-6027
http://in.gov/idem/cleanwater/2432.htm

Subject: Data Collection for Total Nitrogen for Major Sanitary Dischargers

Dear Environmental Protection Colleagues:

Nutrient pollution is one of our Nation's top environmental challenges and considerations for addressing it continue to be a priority for IDEM. Nutrient pollution can lead to public health issues and impacts the economy and is of particular concern with regard to harmful algal blooms in the State of Indiana and harmful algal blooms and hypoxia problems in further downstream waters.

In response to the nutrient pollution concerns, the U.S. Environmental Protection Agency (EPA) released a memorandum on September 22, 2016 entitled "Renewed Call to Action to

Reduce Nutrient Pollution and Support for Incremental Actions to Protect Water Quality and Public Health" https://www.epa.gov/sites/production/files/2016-09/documents/renewed-call-nutrient-memo-2016.pdf.
The memorandum highlights examples of problems related to nutrient pollution and also provides EPA's approaches for dealing with sources of nutrient pollution.

One of the key action items that EPA highlights within the memorandum is the reduction of the nutrient load from point sources. EPA recommends a goal of monitoring requirements inclusion for total phosphorus and total nitrogen in NPDES permits for major municipal wastewater facilities.

The State of Indiana has not yet instituted any statewide monitoring requirements for total nitrogen. To begin the process of total nitrogen data collection, IDEM is proposing that all major sanitary dischargers with average design flow ratings of 1.0 MGD or greater begin monitoring for total nitrogen as a requirement of their next NPDES permit renewal (Commencing with permittees required to submit NPDES renewal applications or applications for modification of an effective NPDES permit after January 1, 2019). IDEM is proposing that total nitrogen be monitored and reported to IDEM on a monthly basis.

The data collected will be used to garner a better understanding of nitrogen loadings in Indiana waters and aid the State of Indiana with future updates of the State of Indiana's nutrient reduction efforts.

As always, IDEM is proud to partner alongside our permittees in efforts to protect the environment and provide for a prosperous economy in the State of Indiana. Thank you for your diligent efforts in protecting our environment.

If you should have questions concerning this matter, please feel free to contact the following:

Jerry Dittmer, Branch Chief, jdittmer@idem.in.gov 317/233-0469
Leigh Voss, Section Chief, lvoss@idem.in.gov 317/232-8698
Jason House, Technical Env. Specialist, jahouse@idem.in.gov 317/233-0470

Jason House
Indiana Department of Environmental Management
Office of Water Quality - Permits Branch
100 N. Senate Avenue, Mail Code 65-42
Indianapolis, IN 46204
Phone: 317/233-0470
Toll Free: 1-800/451-6027
http://in.gov/idem/cleanwater/2432.htm

IDEM values your feedback.

Please take two minutes and complete this brief survey.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 2 2 2016

OFFICE OF WATER

MEMORANDUM

SUBJECT: Renewed Call to Action to Reduce Nutrient Pollution and Support for Incremental Actions to Protect Water Quality and Public Health

FROM: Joel Beauvais
Deputy Assistant Administrator

TO: State Environmental Commissioners, State Water Directors

Nutrient pollution remains one of the greatest challenges to our Nation's water quality and presents a growing threat to public health and local economies – contributing to toxic harmful algal blooms, contamination of drinking water sources, and costly impacts on recreation, tourism and fisheries. Recognizing the important roles, responsibilities and authorities of all levels of government, industries, agriculture, nongovernmental organizations, academia and the public, the Office of Water will continue to foster and support partnerships and collaboration which are critical to making sustained progress on reducing this significant threat to water quality and public health.

Five years ago, the Office of Water issued a national call to action and a framework for collaboration to address the substantial and growing threat of nutrient pollution to America's water resources.[1] Since then, the EPA has partnered with states and collaborated with other federal agencies and stakeholders to reduce nitrogen and phosphorus loadings to our nation's waters. While many entities have taken meaningful actions to reduce nutrient pollution, there continues to be a pressing need for concerted action to reduce nutrient pollution nationwide.

This memorandum highlights the continued need for action to address this challenge, calls upon states and stakeholders to intensify their efforts in collaboration with EPA, and announces support for state planning or implementation of watershed-based, multi-stakeholder projects to reduce impacts to public health from nitrates in sources of drinking water and from nitrogen and phosphorus pollution contributing to harmful algal blooms.

[1] See "Working in Partnership with States to Address Phosphorus and Nitrogen Pollution through Use of a Framework for State Nutrient Reductions" https://www.epa.gov/sites/production/files/documents/memo_nitrogen_framework.pdf

Recent Examples of the Continuing Problem

There is an emerging body of evidence that documents threats to public health as well as continued findings of high levels of impacts to the ecological health of our nation's waters from nutrient pollution:

- Nutrient pollution contributes to an increasing trend in observed harmful algal blooms in surface waters that can release toxins that pose risks to human health. In 2014, 400,000 residents of Toledo, Ohio lost their public drinking water for three days due to algal toxins in the city's drinking water. In 2015, a 650-mile bloom on the Ohio River threatened drinking water treatment systems. In early 2016, the City of Ingleside Texas issued a 13-day do-not-drink advisory for cyanotoxins in their drinking water. This year, algal blooms have occurred from Alaska to Florida, closing beaches and affecting tourism and local economies, including a state of emergency declaration in four coastal counties in Florida. The State of Utah recently allocated $1 million to respond to harmful algal blooms in Utah Lake, the third largest lake in the state, which closed beaches and marinas and led to irrigation water restrictions.[2] As of mid-August 2016, states have reported more than 250 health advisories due to harmful algal blooms this year.

- Nitrogen contamination of sources of drinking water can lead to high levels of nitrate in drinking water that are dangerous for infants. In 2015, 183 community water systems exceeded allowable levels of nitrate in drinking water. High levels of nitrates in Des Moines, Iowa's drinking water supply caused the city to install a $4 million treatment plant in 1993, with recent plans for a new, multi-million dollar treatment plant for nitrates. Nitrate drinking water advisories in Columbus, Ohio, over a two-week period in 2015 and for one week this year, have led the community to build a $35 million treatment facility. The Wisconsin Department of Natural Resources is responding to widespread nitrate contamination of groundwater wells in two counties and other states also face serious challenges with nitrate contamination of groundwater. [3]

- The National Aquatic Resource Surveys conducted by the EPA and state and tribal partners continue to show that nutrient pollution affects an alarming proportion of the Nation's waters. The 2012 survey of lakes found that 41 percent of the nation's lakes had high levels of phosphorus and 34 percent had high levels of nitrogen associated with harmful ecological impacts. The 2009-2010 survey of rivers and streams found that 46 percent have high levels of phosphorus and 41 percent have high levels of nitrogen.

Acknowledging concerns related to harmful algal blooms (HABs) and hypoxia, in 2014 Congress enacted the Harmful Algal Bloom and Hypoxia Research and Control Amendments Act which extended the scope of the legislation to include freshwater HABs and hypoxia.[4] In 2015, Congress amended the Safe Drinking Water Act and directed the EPA to develop a strategic plan for assessing and managing risks associated with algal toxins in drinking water provided by public water systems.[5] EPA's strategy identified source water protection (SWP) as a proactive and often cost-effective option to reducing contamination that would otherwise need to be removed by new or enhanced drinking water treatment technologies. While recognizing that factors like vertical stratification and water temperature may

[2] http://beta.deseretnews.com/article/865660931/1-million-hardship-grant-awarded-for-Utah-Lake-study.html?pg=all
[3] http://www.greenbaypressgazette.com/story/news/local/door-co/2016/08/19/epa-official-promises-help-contaminated-well-owners/88965290/
[4] https://www.congress.gov/113/plaws/publ124/PLAW-113publ124.pdf
[5] https://www.congress.gov/114/plaws/publ45/PLAW-114publ45.pdf

impact HABs, the strategy notes that addressing nutrient loading is the most immediate, controllable risk factor.[6]

Keeping the Focus on Nutrient Reductions from All Sources

As the EPA underscored in its 2011 strategy, many of the most effective tools for addressing such pollution – including watershed and partnership approaches to protect source water through actions that address both nonpoint and point sources – are held by state and local governments. In the face of continuing public health impacts from excess nutrients, we ask that states and stakeholders, in collaboration with EPA, intensify efforts to take continued and concerted action to address nutrient pollution.

To help advance these efforts, the EPA Office of Water will:

- continue our support to states, territories and tribes through our "base" grant and technical assistance programs;
- make $600,000 in additional FY 16 resources available for technical support, focused on incremental actions to reduce threats to public health from nitrates in sources of drinking water and from nitrogen and phosphorus pollution contributing to harmful algal blooms; and
- work with states through our Regional Offices to identify high-priority actions that each state intends to take to reduce nutrient pollution and then work together to assess progress and continue to hold ourselves accountable for achieving results.[7]

Key elements of the EPA's plans for working with partners and stakeholders over the next several years include the following priorities:

Prioritizing Watersheds and Setting Load Reduction Goals

Primarily through our "base" program grants to state water pollution control agencies, the EPA will continue to support states as they develop and implement nutrient reduction frameworks and strategies, including the 12 states that are members of the Mississippi River/Gulf of Mexico Watershed Nutrient (Hypoxia) Task Force. The eight elements of the nutrient load reduction framework outlined in the 2011 Memorandum continue to represent the minimum building blocks for an effective program to manage nitrogen and phosphorus pollution. We recognize that states may not combine all these elements into one document. In whatever form a framework or strategy takes, what remains important is that each state work expeditiously to:

- prioritize watersheds for nutrient load reduction;
- set challenging yet realistic load-reduction goals that improve water quality;
- reduce point and nonpoint sources of nutrient loads;
- provide for accountability and public reporting in its nutrient load reduction program; and

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[6] https://www.epa.gov/sites/production/files/2015-11/documents/algal-risk-assessment-strategic-plan-2015.pdf

[7] While this memorandum focuses on EPA's engagement with states, EPA recognizes that a number of tribes are also concerned about and working to reduce nutrient pollution (see, e.g., https://nationaltribalwatercouncil.org/nutrient-strategies/). EPA encourages tribes to discuss appropriate next steps in their work to reduce nutrient pollution with their EPA Regional Office.

- continue to develop numeric nutrient criteria that clearly identify nutrient levels that are consistent with a state, tribe or territory's uses of its waters under the Clean Water Act (CWA) and serve as clear guides for protecting and restoring those uses for its citizens.

The EPA notes that in setting long-term priorities for their CWA Section 303(d) Programs, 45 states identified nutrient-related pollution as a priority to be addressed by TMDLs and/or alternative restoration plans.[8] To date, more than 8,600 nutrient-related TMDLs have been established, primarily by states, to guide nutrient reduction efforts in more than 5,800 waterbodies, including 1,800 nutrient-related TMDLs established for more than 1,200 waterbodies since 2011.[9]

Reducing Point Sources of Nutrient Pollution

An important tool under the CWA continues to be issuing NPDES permits for point sources that limit nutrient discharges into priority waters. States have set end-of-pipe limits and used innovative approaches (e.g., trading) to reduce nutrient loads. Signs of progress include: 34 percent of the nation's 4,420 major individual wastewater treatment facilities that have numeric nitrogen and/or phosphorus limits, and 63 percent have nitrogen and/or phosphorus monitoring requirements.[10] The EPA will work with states to move towards the goal of including monitoring requirements for both total nitrogen and total phosphorus in NPDES permits for major municipal wastewater facilities.

To support states and their communities, the EPA will survey municipal wastewater treatment plants across the country to assess how efficiently conventional secondary treatment plants remove nutrients and how nutrient removal can be improved with enhancements to operations and maintenance. States and communities may be able to use this information to cost-effectively reduce nutrient loads from some POTWs. The EPA will continue to document community successes in reducing nutrient pollution using low-cost approaches that, in some cases, have reduced their energy bills.

Reducing Nutrient Loads from Nonpoint Sources

Nonpoint sources play a substantial role in nutrient pollution in many watersheds, making watershed-based approaches at the state and local level – including those addressing nutrient pollution from agriculture and stormwater sources – critically important to addressing nutrient pollution. EPA, for its part, will continue to support state efforts with its $165 million per year grant program under section 319 of the Clean Water Act, which, since 2011, has funded more than 1,100 projects to reduce agricultural nutrient losses and improve or replace onsite disposal (septic) systems.

Agriculture is an important contributor to nutrient pollution in many watersheds and can and should play a key role in addressing this challenge, through the implementation of cost-effective best management and soil conservation practices. EPA recognizes the importance of USDA's work to support the adoption of conservation systems through its national conservation programs and its initiatives,

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[8]Information provided by states to support reporting under EPA's new 303(d) program performance measure. U.S. Environmental Protection Agency, Office of Water, Water Quality Assessment and TMDL Information (ATTAINS) database. Data retrieved on November 4, 2015.

[9]U.S. Environmental Protection Agency, Office of Water, Water Quality Assessment and TMDL Information (ATTAINS). [Online] Available at: http://www.epa.gov/waterdata/assessment-and-total-maximum-daily-load-tracking-and-implementation-system-attains. [Accessed 23 May 2016].

[10] Source: U.S. Environmental Protection Agency's Integrated Compliance Information System- National Pollutant Discharge Elimination System (ICIS-NPDES). Data retrieved on February 5, 2016; as of this date, not all state permit data have been entered into ICIS.

including the innovative Regional Conservation Partnership Program (RCPP) and geographic initiatives for the Mississippi River Basin, Chesapeake Bay, Great Lakes and other regions. EPA and state water quality agencies will continue to collaborate with USDA's Natural Resources Conservation Service (NRCS) on the National Water Quality Initiative (NWQI), which is reducing nutrients, sediment and animal agriculture-related pathogens in more than 250 small watersheds across the country and helping to foster broader collaboration between NRCS and state water quality agencies.

EPA will continue to collaborate with stakeholders in the agricultural sector and urges an acceleration of efforts in this area. One example of promising recent work is a partnership of pork and dairy producers, USDA, EPA and others on the "Nutrient Recycling Challenge," a competition to develop affordable technologies that recover nutrients from livestock manure and generate products that make beneficial use of nutrients and reduce nutrient losses. EPA is also collaborating with partners in the agricultural industry to train certified crop advisors on high impact conservation practices and systems that reduce nutrient losses. Agricultural stakeholders can also play an important role in watershed partnership efforts to reduce nutrient pollution, as they are, for example, in Cedar Rapids, Iowa, through the Middle Cedar Partnership RCPP project, where the city is working with local conservation partners, farmers and landowners to install practices to address increasing nitrates and flood events in the Cedar River. EPA recognizes that the growing interest of private entities in sustainability of their supply chains has the potential to reduce nutrient loads.

Continued Progress on Developing Nutrient Criteria

Strengthening water quality standards to address nutrient-impaired waterbodies is one important tool for meeting clean water goals. EPA continues to advocate the benefits of adopting numeric nutrient criteria because they provide measurable water quality-based goals that are easier to implement than the narrative criteria statements in many state water quality standards. To date, 28 states, territories and one tribe have adopted numeric criteria into their water quality standards for nitrogen and/or phosphorus for one or more of their water bodies.[11] Since 2005, EPA's Nutrient Scientific Technical Exchange Partnership and Support Program (N-STEPS) has provided 30 states with technical assistance for development of numeric criteria for nutrient pollution, including development of numeric translators that can be used in the near term to implement state narrative nutrient criteria. EPA will continue to strongly encourage and support states and tribes as they develop numeric nutrient criteria and numeric translators for the narrative standards and will continue to track progress towards adoption of numeric nutrient criteria into water quality standards.

Financial Assistance, Including for Incremental Actions Focused on Public Health Risks

OW will continue to make assistance available through the Clean Water Act Section 106 and 319 grant programs and through infrastructure assistance via the State Revolving Loan Fund Programs. Other sources of funding include Section 604(b) planning grants, Wetland Program Development grants and geographically-targeted funding for the Chesapeake Bay, Great Lakes and other great water bodies. OW will continue its long-standing technical assistance, via the N-STEPS program, to support states' development and adoption of numeric nutrient criteria in water quality standards.

[11] U.S. Environmental Protection Agency, Office of Water, State Development of Numeric Criteria for Nitrogen and Phosphorus Pollution. Available at https://www.epa.gov/nutrient -policy-data/state-development-numeric-criteria-nitrogen-and-phosphorus-pollution [accessed June 23, 2016].

Responding to the growing evidence of threats to human health, OW will use FY 16 resources to make an additional $600,000 in technical assistance available for five to ten projects proposed by states or tribes to help them and their partners advance their planning or implementation of multi-stakeholder projects to reduce threats to public health from nitrates in sources of drinking water and from nitrogen and phosphorus pollution contributing to harmful algal blooms. Our experience shows that projects that focus on a defined, small watershed area, that address all sources of contamination, that have active local community involvement and that combine resources from multiple partners and stakeholders are most likely to be successful. We envision the modest resources we are offering could help meet a key technical assistance need for such a project and help EPA show the value of such projects and collaborative efforts for reducing threats that nutrient pollution pose to public health and water quality.

Transparency and Accountability

Documentation of areas in need of more attention as well as progress are critical to success of all of the efforts described above. The EPA encourages all states to be accountable to the public for their work on nutrient pollution. The EPA is collaborating with the Association of Clean Water Administrators as they work with their members to document state progress. As noted above, through our Regional offices EPA will work with states to highlight high priority, incremental actions they intend to take to address nutrient pollution going forward. The EPA will issue biennial reports that assess progress, prioritize action as needed, and provide accountability for addressing the nutrient pollution challenge with the urgency and sustained commitment it warrants.

The EPA will continue to document the extent and severity of nutrient pollution and algal toxins in its national and broad regional statistical surveys and continue to support state and tribal monitoring programs that document state-scale conditions and the status of individual waters. Recent advances in nutrient sensors and advanced monitoring technologies will help to track progress.

Need for Further Action

Given the scope and tremendous environmental and economic impacts of nutrient pollution on public health and water quality, it is critical that all of us renew our commitment and accelerate our efforts to address this challenge. The EPA looks forward to dialogue with states on renewed engagement, continued collaboration, and expansion of meaningful partnerships to help us meet this priority challenge; and to working together to ensure public transparency and accountability in this ongoing effort.

cc: Regional Administrators
Regional Water Division Directors
Office of Water Office Directors
ECOS Executive Director
ACWA Executive Director

Total Nitrogen Monitoring - Major Sanitary Dischargers

Frequently Asked Questions & Answers

Q: Who is responsible to monitor for total nitrogen?

A: Major Sanitary Dischargers 1.0 MGD average design flow or greater.

Q: When do permittees need to commence monitoring for total nitrogen?

A: Permit renewals or modifications resulting from applications received after January 1, 2019. Permittees are not obligated to begin monitoring for total nitrogen until the requirement is placed in the NPDES permit.

Q: Why is IDEM requiring monitoring for total nitrogen for all major sanitary dischargers?

A: In response to the nutrient pollution concerns, the U.S. Environmental Protection Agency (EPA) released a memorandum on September 22, 2016 entitled "Renewed Call to Action to Reduce Nutrient Pollution and Support for Incremental Actions to Protect Water Quality and Public Health" https://www.epa.gov/sites/production/files/2016-09/documents/renewed-call-nutrient-memo-2016.pdf. The memorandum highlights examples of problems related to nutrient pollution and also provides EPA's approaches for dealing with sources of nutrient pollution.

One of the key action items that EPA highlights within the memorandum is the reduction of the nutrient load from point sources. EPA recommends a goal of monitoring requirements inclusion for total phosphorus and total nitrogen in NPDES permits for major municipal wastewater facilities.

The State of Indiana has not yet instituted any statewide monitoring requirements for total nitrogen. To begin the process of total nitrogen data collection, IDEM is proposing that all major sanitary dischargers with average design flow ratings of 1.0 MGD or greater begin monitoring for total nitrogen as a requirement of their next NPDES permit renewal.

The data collected will be used to get a better understanding of nitrogen loadings in Indiana waters and aid the State of Indiana with future updates of the State of Indiana's nutrient reduction efforts.

Q: What is the required monitoring frequency for total nitrogen?

A: The minimum monitoring frequency expected is one (1) time monthly by 24 hr. composite sampling in the effluent only. Influent monitoring is not proposed at this time.

Q: What are the reporting requirements for total nitrogen?

A: Total nitrogen results are to be reported on the monthly discharge monitoring report. Permittees are required to report both the concentration in milligrams per liter and associated loading in pounds per day.

Q: What analytical methods are required for total nitrogen monitoring?

A: There is no approved method for the analysis of total nitrogen for NPDES reporting purposes. Permittees must analyze for the components of total nitrogen. These components are *total kjeldahl nitrogen* and *nitrates/nitrites*. The sum of these components are to be reported as the total nitrogen result.

Only methods that are listed as approved in 40 CFR 136.3 for total kjeldahl nitrogen and nitrates/nitrites can be used for analysis. Please reference the following site for the approved methods:

https://www.epa.gov/cwa-methods/approved-cwa-chemical-test-methods#analyte

Dated: 2-8-19, JH

Sewer Ban Early Warning List (01/16/2019)

Facility Name	County	Permit #	Date Letter(s) sent	Reason
Albany	Delaware	IN0022136	11/15/16 SBEW reminder, 10/26/15 SBEW	Hydraulic overload
Allen County RSD (	Allen	IN0048119	02/07/17 SBEW reminder, 12/28/15 SBEW	Hydraulic overload
Arcadia	Hamilton	IN0021334	02/09/18 SBEWR, 04/04/17 SBEWR, 07/22/15 SBEWR, 03/03/06 SBEW	Hydraulic overload
Atlanta	Hamilton	IN0022306	10/16/17, 10/11/16, 07/09/15 SBEW reminders, 02/21/06 SBEW	Hydraulic overload
Bedford	Lawrence	IN0025623	Sewer Ban consideration letter 10/31/17	SSOs (2014- 69, 2015 - 111, 2016 - 172)
Bicknell	Knox	IN0039276	04/14/05 SB consideration letter, 06/15/98 SBEW, 04/04/89 SBEW	SSOs (2014 - 11) (2015 - 19) (2016 - 6)
Birdseye	Dubois	IN0039748	11/29/18 Reminder, 11/27/17 reminder, 12/15/16 reminder, 10/14/15 SBEW, 2003 SB	Hydraulic overload
Bloomington S (Dill	Monroe	IN0035718	10/20/16 SBEW reminder, 04/13/99 SBEW	SSOs
Brownings Rec	Ripley	IN0052523	01/19/16 SBEW	Hydraulic overload
Carriage House	Wabash	IN0051861	12/28/15 SBEW	Hydraulic overload
Community Utilities	Lake	IN0037176	07/26/18 SBEW	Hydraulic overload
Country Court Estat	Allen	IN0045292	01/23/17 SBEW	Hydraulic overload
Creekside MHP	Shelby	IN0038431	08/03/18 SBEW Reminder, 07/31/18 SBEW Reminder, 07/26/17 SBEW Reminder, 08	Hydraulic overload
Dana	Vermillion	IN0063843	09/11/18 SBEW, 04/05/17 SBEW	Hydraulic overload
Dunkirk	Blackford	IN0021491	05/22/17 SBEW	Hydraulic overload
Eastway Ct Apts	Hancock	IN0051691	10/09/18 SBEW Reminder, 10/16/17, 09/13/16 SBEW reminders, 10/27/15 SBEW	Hydraulic overload
Elwood	Madison	IN0032719	04/15/98 SBEW	Hydraulic overload and SSOs ('14-13, '15-20)
Farmland	Randolph	IN0021512	01/04/18 SBEWR, 12/03/15 SBEWR, 08/02/13 SBEWR, 03/03/06 SBEW	Hydraulic overload
Fort Branch	Gibson	IN0022896	02/26/17 SBEW, 08/02/13 SBEWR, 1996 SBEW	Hydraulic overload
Francesville	Pulaski	IN0040037	12/08/16 SBEW reminder, 04/14/04 SBEW	Hydraulic overload
Frankton	Madison	IN0020028	01/04/18, 12/15/16 SBEW reminder, 11/12/15 SBEWR, 08/07/13 SBEW	Hydraulic overload
Gaston	Delaware	IN0020338	10/26/15 SBEW	Hydraulic overload
Goodland	Newton	IN0040070	11/29/18 reminder, 01/04/18 reminder, 12/15/16 SBEW reminder, 12/03/15 SBEW	Hydraulic overload
Harrison Lake	Bartholomew	IN0051683	10/31/16 SBEW reminder, 09/28/15 SBEW	Hydraulic overload
Hartsville	Bartholomew	IN0021075	1/23/17 SBEW	Hydraulic overload
Holland	Dubois	IN0023108	08/24/18 SBEW Reminder, 06/30/17 SBEW reminder, 10/14/15 SBEW	Hydraulic overload
Indian Hills MHP	Union	IN0038911	01/05/17 SBEW, 1998 SBEW	Hydraulic overload
Jackson Twp.	Blackford	IN0061000	12/13/16 SBEW reminder, 12/03/15 SBEW	Hydraulic overload
Jasonville	Greene	IN0021008	02/05/2018 SBEWR, 01/05/17 SBEW	Hydraulic overload
Kingsford Heights	Jackson	IN0023337	03/21/2018 SBEW	Hydraulic overload
Knightstown	Henry	IN0040177	09/27/16 SBEW reminder, 11/12/15 SBEWR, 08/13/13 SBEW	Hydraulic overload
Lake and Forest Clu	Jackson	IN0060674	06/30/17 SBEW	Hydraulic overload
Lake Eliza	Porter	IN0051446	01/04/18, 12/07/16 SBEW reminder, 10/26/15 SBEW	Hydraulic overload
Lyons	Greene	IN0023639	10/30/18 SBEW Reminder, 10/16/17, 09/06/16 SBEW reminders, 08/17/15 SBEW, 08	Hydraulic overload
Meck's MHP	Kosciusko	IN0054704	01/19/16 SBEW	Hydraulic overload
Michigantown	Clinton	IN0040355	09/27/16, SBEW reminder, 06/02/15 SBEW	Hydraulic overload
Mooreland	Henry	IN0040398	04/19/18 SBEWR, 09/12/17 SBEW Reminder, 08/24/16 SBEW	Hydraulic overload
Montgomery	Daviess	IN0034932	08/07/17 SBEWR, 12/15/16 SBEW Reminder, 12/03/15 SBEW	Hydraulic overload
Monroeville	Allen	IN0021423	07/14/16 SBEW	Hydraulic overload
Morgantown	Morgan	IN0036820	07/19/17 SBEWR, 08/24/16 SBEWR, 08/14/15 SBEW	Hydraulic overload
Mulberry	Clinton	IN0031976	09/13/16 SBEW reminder, 08/13/15 SBEW	Hydraulic overload
New Market	Montgomery	IN0021041	12/17/18 reminder, 12/15/16 SBEWR, 09/18/15 SBEW, 8/11/14 SBEW terminated, 11	Hydraulic overload
New Ross	Montgomery	IN0059790	07/26/18 SBEW	Hydraulic overload
New Whiteland	Johnson	IN0020966	07/08/16 SBEW	Hydraulic overload

Oakwood MHP	Daviess	IN0038415	12/03/15 SBEW	Hydraulic overload
Owensville	Gibson	IN0038288	07/08/16 SBEW	Hydraulic overload
Parker City	Randolph	IN0020729	05/22/17 SBEW	Hydraulic overload
Petersburg	Pike	IN0024325	08/24/17 SBEW Reminder, 07/08/16 SBEW	Hydraulic overload
Prosser MHP	Wabash	IN0062405	12/28/15 SBEW	Hydraulic overload
Reynolds	White	IN0030589	11/27/17 SBEW reminder 12/16/16 SBEW reminder, 08/12/15 SBEW	Hydraulic overload
St. Paul	Decatur	IN0020842	08/17/17 SBEW Reminder, 05/12/16 SBEW	Hydraulic overload
Scottsburg	Scott	IN0020397	09/29/17, 07/16/16 SBEW reminders, 08/13/13 SBEW	Hydraulic overload
Summitville	Madison	IN0024562	2001 SBEW	Hydraulic overload
Swayzee	Grant	IN0037001	07/02/18 SBEWR, 10/14/15 SBEW	Hydraulic overload
Sweetser	Grant	IN0064165	06/14/16 SBEW	Hydraulic overload
Switz City	Greene	IN0042650	02/05/2017 SBEWR, 01/23/17 SBEW	Hydraulic overload
Tennyson	Warrick	IN0041670	07/11/16 SBEW	Hydraulic overload
Thorntown	Boone	IN0024589	10/02/17 SBEW Reminder, 07/08/16 SBEW	Hydraulic overload
Waynetown	Montgomery	IN0020524	09/27/16 SBEW reminder, 08/02/13 SBEW	Hydraulic overload
Western Hancock	Hancock	IN0059013	10/11/16 SBEW reminder, 07/22/15 SBEW	Hydraulic overload
Westport	Decatur	IN0024830	07/21/17 SBEW, 01/19/16 SBEWR, 08/02/13 SBEWR, 8/3/1993 SBEW	Hydraulic overload and SSOs
Windfall	Tipton	IN0040762	04/09/18 SBEWR, 07/23/15 SBEW	Hydraulic overload
Winslow	Pike	IN0040789	12/17/15 SBEWR, 08/02/13 SBEWR, 1995 SBEW	Hydraulic overload

Facilities Currently on SEWER BAN

UPDATED 04/09/2018

FACILITY NAME	NPDES #	COUNTY	DATE OF BAN	COMMENTS	%SAN	DESIGN
Colfax	IN0020443	Clinton	08/29/17	Been on Sewer ban early warning since 1990. 2013 119% 2014 107% 2015 134% 2016 114%	100	0.11
Farmersburg	IN0021148	Sullivan	7/6/93	Flow data for '09, '10, and '11: 61, 61, 50% Overflows: 4, 1, 4	100	0.30
Flora	IN0020141	Carroll	10/31/74	8/07 AO for SSOs. Flow data for '09, '10, '11, '12: 115, 107, 124, 121% Overflows: 21, 21, 44, 6 SB reminder letter sent 7-13.	100	0.428
Kingman	IN0039390	Fountain	09/20/16	2015 232% 2014 163% 2013 106%	100	0.070
Monon	IN0021580	WHITE	12/07/15	2013 **SBEW imposed 8-2-2013** Design flow 0.221 mgd. 2010 116% 2011 122% 2012 86% 2013 140% 2014 170% **2015 12/07/15 sewer ban**	100	0.221
New Albany	IN0023884	Floyd	9/12/91	Agreed Order Flow data for '09, '10, '11: 72, 84, 87% Overflows: 90, 14, 53	99	12.0

Facilities Currently on SEWER BAN

UPDATED 04/09/2018

FACILITY NAME	NPDES #	COUNTY	DATE OF BAN	COMMENTS	%SAN	DESIGN
Shirley	IN0024503	Hancock	02/10/16	2012-141%, 2013-172%, 2014-183%	100	0.170
Upland (North LS only)	IN0036978	Grant	05/23/00	Excessive bypassing (48 days in 1999) Flow data for '09, '10, '11: 40, 44, 45% Overflows: 8, 6, 10	90	0.950

Removed from Sewer Ban List

Clay City	IN0039861	Clay	10/30/02	Sewer Ban terminated 2-17-2012 Flow data for '09, '10, '11: 54%, 55%, and 54% Overflows: 1, 0, 0	100	0.242
Cloverdale	IN0022616	Putnam	7/31/06	Sewer Ban terminated 4-21-10		
Greentown	IN0021091	Howard	9/11/97	Sewer Ban terminated 10-25-2014	100	0.42
Lapel	IN0020087	Madison	11/27/97	Sewer Ban terminated 2-17-12 Flow data for '09, '10, '11: 65, 62, 62% Overflows: 0, 2, 3	100	0.40
Moores Hill	IN0023817	Dearborn	4/13/99	Sewer Ban terminated 2-7-12		
Prince's Lakes	IN0042366	Bartholomew	11/26/08	Poor O&M Flow data for '09, '10, '11: 38, 53, 29% Overflows: 4, 0, 6	100	3.500
Staunton	IN0025224	Clay	05/23/00	Sewer Ban terminated 2-17-12 Flow data for '09, '10, '11: 64, 65, 45% Overflows: 0, 0, 0	100	0.100
Van Buren	IN0020559	Grant	06/10/02	Sewer Ban terminated 8-24-11		