



INDIANA DEPARTMENT of ENVIRONMENTAL MANAGEMENT

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Mike Braun
Governor

Clint Woods
Commissioner

November 14, 2025

Via Email to: twarthen@mooreville.in.gov
Mr. Tom Warthen, Town Council President
Town of Mooreville
41 E. Harrison St.
Mooreville, Indiana 46158

Dear Mr. Warthen:

Re: Inspection Summary/ Noncompliance Letter
Mooreville WWTP
NPDES Permit No. IN0023825
Mooreville, Morgan County

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

Date(s) of Inspection: November 12, 2025
Type of Inspection: Reconnaissance Inspection
Inspection Results: Violations were observed.

The following concerns were noted:

IDEM inspector Kevin Stark was notified by Calvin Boulton, Mooreville Wastewater Treatment Plant (WWTP) Superintendent, of an upset at the WWTP. The upset appears to be due to ongoing high strength industrial wastestreams received. The upset also appears to be linked to numerous odor complaints received by IDEM since September 2025.

The below information is detailed as a result of the on-site inspection.

The Enforcement evaluation generated an unsatisfactory rating. According to Mooreville's Additional Action Plan, dated July 10, 2025, all pretreatment corrective actions were resolved in April 2025. Noted violations under the "Pretreatment" section of this inspection report indicate otherwise. (see Pretreatment section of this inspection report for list of violations)

These concerns will be forwarded to the OWQ Enforcement Section for consideration

in conjunction with your Agreed Order, Case No. 2014-22631-W and will not require an immediate response. You will be notified of any required action and any questions can be directed to your Enforcement Case Manager.

The concerns noted below are not addressed in your Agreed Order and will require a response as detailed in the closing paragraph.

1. The Receiving Waters Appearance was rated as marginal due to slight discoloration, some solids, and notable foaming observed at the outfall (see attached photographs). Residuals indicative of partially treated effluent were observed at the outfall. Part I. A. 2 of the permit prohibits the discharge from any and all point sources specified within this permit from causing the receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: 1) that will settle to form putrescent or otherwise objectionable deposits; 2) that are in amounts sufficient to be unsightly or deleterious; 3) that produce color, visible oil sheen, odor, or other conditions in such degree as to create nuisance.
2. Effluent Appearance was rated as unsatisfactory due to noticeable discoloration and solids observed in the effluent (see attached photograph). Part I. A. 2 of the permit prohibits the discharge from any point sources specified within this permit from causing receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: (1) that will settle to form putrescent or otherwise objectionable deposits; (2) that are in amounts sufficient to be unsightly or deleterious; (3) that produce color, visible oil sheen, odor, or other conditions in such degree as to create nuisance; (4) which are in amounts sufficient to be acutely toxic to, or to otherwise severely injure or kill aquatic life, other animals, plants, or humans; (5) which are in concentrations or combinations that will cause or contribute to the growth of aquatic plants or algae to such a degree as to create a nuisance, be unsightly, or otherwise impair the designated uses.
3. The Pretreatment evaluation generated an unsatisfactory rating for the following issues:
 - A. The facility is not routinely enforcing SUO limits or surcharges on its industrial users (IUs).
 - B. Staff have yet to complete a full IU survey and do not routinely inspect industries to determine wastewater characteristics of the IUs.
 - C. Mooresville's approved design loadings based on Construction Permit No. L-0347 dated May 5, 2010 are 6,104 lbs/day CBOD and 6805 lbs/day TSS. Based on preliminary MRO data for October and November 2025, the plant is being organically overloaded on numerous days. This excessive organic loading appears to be causing pass through/interference at the POTW.

These are violations of:

- A. Part III. C. 1. which states that the permittee shall implement and enforce its SUO.

- B. Part III. B. 2. 6. which states that the permittee shall provide sufficient resources and qualified personnel to implement the pretreatment program requirements contained in Part III of this permit.
- C. Part III. C. 2. c. 3. which states that the permittee shall inspect any IU, including an IU with an IWP permit issued by the CA, as necessary to: (1) achieve and/or maintain compliance with the requirements of this NPDES permit; and/or (2) determine compliance with the requirements of the permittee's SUO.
- D. Part III. C. 9. which states that the permittee shall conduct an industrial survey at a minimum frequency of once every two (2) years. The permittee shall utilize the completed survey forms to identify changes in operations and/or volume and nature of the discharge from each IU.

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.

Within 10 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and a plan with timelines for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in additional formal enforcement action. 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 Kevin Stark at 812-525-9411 or by email to kstark@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'KG R', is positioned above the typed name of the signatory.

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure



NPDES Wastewater Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0023825		Facility Type: Municipality		Facility Classification: Major		Facility Classification: III		TEMPO AI ID	
Date(s) of Inspection:		November 12, 2025							
Type of Inspection:		Reconnaissance Inspection							
Name and Location of Facility Inspected: Mooreville WWTP 499 South Park Dr. Mooreville IN 46158					Receiving Waters: White Lick Creek		Permit Expiration Date: 1/31/2026		
County: Morgan							Design Flow: 3.5MGD		
On Site Representative(s):									
First Name		Last Name		Title		Email		Phone	
Calvin		Boulton		Superintendent		coulton@mooreville.in.gov		317-831-0625	
Dustin		Beard		Pretreatment Coordinator		wbeard@mooreville.in.gov			
Was a verbal summary of findings presented to the on-site representative? Yes									
Certified Operator:		Number:		Class:		Effective Date:		Expiration Date:	
Calvin Boulton		19596		IV		7-1-24		6-30-27	
Email:		cboulton@mooreville.in.gov							
Cyber Security Contact:									
Name: NA Email:									
Responsible Official: Mr. Tom Warthen, Town Council President 41 E. Harrison St. Mooreville, Indiana 46158					Permittee: Town of Mooreville				
					Email: twarthen@mooreville.in.gov				
					Phone: 317-691-6607			Contacted?	
					Fax:			Yes	
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)									
U	Receiving Waters	N	Facility/Site	N	Self-Monitoring	U	Enforcement		
U	Effluent	N	Operation	N	Flow Measurement	U	Pretreatment		
N	Permit	N	Maintenance	N	Laboratory	N	Effluent Limits Compliance		
N	Collection System	N	Sludge Disposal	N	Records/Reports	N	Other:		
DETAILED AREA EVALUATIONS									
Receiving Waters:									
Comments: The Receiving Waters Appearance was rated as marginal due to slight discoloration, some solids, and notable foaming observed at the outfall (see attached photographs). Residuals indicative of partially treated effluent were observed at the outfall. Part I. A. 2 of the permit prohibits the discharge from any and all point sources specified within this permit from causing the receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: 1) that will settle to form putrescent or otherwise objectionable deposits; 2) that are in amounts sufficient to be unsightly or deleterious; 3) that produce color, visible oil sheen, odor, or other conditions in such degree as to create nuisance.									
Effluent:									
Comments: Effluent Appearance was rated as unsatisfactory due to noticeable discoloration and solids observed in the effluent (see attached photograph). Part I. A. 2 of the permit prohibits the discharge from any point sources									

specified within this permit from causing receiving waters, including the mixing zone, to contain substances, materials, floating debris, oil, or scum: (1) that will settle to form putrescent or otherwise objectionable deposits; (2) that are in amounts sufficient to be unsightly or deleterious; (3) that produce color, visible oil sheen, odor, or other conditions in such degree as to create nuisance; (4) which are in amounts sufficient to be acutely toxic to, or to otherwise severely injure or kill aquatic life, other animals, plants, or humans; (5) which are in concentrations or combinations that will cause or contribute to the growth of aquatic plants or algae to such a degree as to create a nuisance, be unsightly, or otherwise impair the designated uses.

Enforcement:

2014-22631-W

Charlotte McFerran, CMcferra@idem.in.gov, 317-233-5151

Comments:

Enforcement evaluation generated an unsatisfactory rating. According to Mooresville's Additional Action Plan, dated July 10, 2025, all pretreatment corrective actions were resolved in April 2025. Noted violations under the "Pretreatment" section of this inspection report indicate otherwise (see Pretreatment section of this inspection report for list of violations).

Pretreatment:

Comments:

The Pretreatment evaluation generated an unsatisfactory rating for the following issues:

- A. The facility is not routinely enforcing SUO limits or surcharges on it's industrial users (IUs).
- B. Staff have yet to complete all IU surveys and do not routinely inspect industries to determine wastewater characteristics of the IUs.
- C. Mooresville's approved design loadings based on Construction Permit No. L-0347 dated May 5, 2010 are 6,104 lbs/day CBOD and 6805 lbs/day TSS. Based on preliminary MRO data for October and November 2025, the plant is being organically overloaded on numerous days. This excessive organic loading appears to be causing pass through/interference at the POTW.

These are violations of:

- A. Part III. C. 1. which states that the permittee shall implement and enforce its SUO.
- B. Part III. B. 2. 6. which states that the permittee shall provide sufficient resources and qualified personnel to implement the pretreatment program requirements contained in Part III of this permit.
- C. Part III. C. 2. c. 3. which states that the permittee shall inspect any IU, including an IU with an IWP permit issued by the CA, as necessary to: (1) achieve and/or maintain compliance with the requirements of this NPDES permit; and/or (2) determine compliance with the requirements of the permittee's SUO.
- D. Part III. C. 9. which states that the permittee shall conduct an industrial survey at a minimum frequency of once every two (2) years. The permittee shall utilize the completed survey forms to identify changes in operations and/or volume and nature of the discharge from each IU.

Effluent Limits Compliance:

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

Comments:

IDEM REPRESENTATIVE

Inspector Name:

Kevin Stark

Email:

kstark@idem.IN.gov

Phone Number:

812-525-9411

Other staff participating in the inspection:

Name(s)

Holly Zurcher

Email(s)

hzurcher@idem.in.gov

IDEM MANAGER REVIEW

IDEM Manager:

Kim Rohr

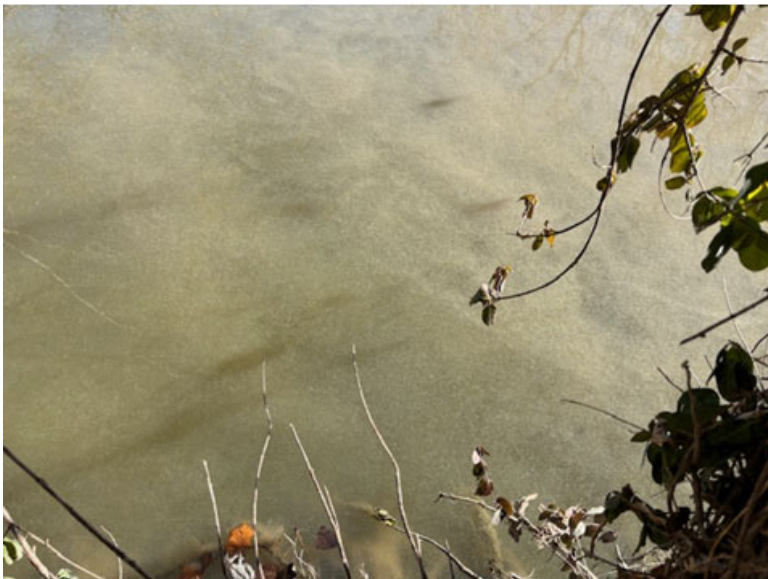
Date:

11/14/2025

Inspection Photographs



Facility:	
Mooreville WWTP	
Photographer:	
Kevin Stark	
Date: 11/12/2025	Time: 11:00:00 AM
Others Present:	
Holly Zurcher	
Location/Description:	
Photo showing plume from untreated/partially treated wastewater being discharged into the receiving stream.	



Facility:	
Mooreville WWTP	
Photographer:	
Kevin Stark	
Date: 11/12/2025	Time: 11:00:00 AM
Others Present:	
Holly Zurcher	
Location/Description:	
Close up photo of obvious signs of solids being discharged into the receiving stream.	



Facility:	
Mooreville WWTP	
Photographer:	
Kevin Stark	
Date: 11/12/2025	Time: 11:00:00 AM
Others Present:	
Holly Zurcher	
Location/Description:	
Photo of effluent chamber showing heavy solids discharging.	



Facility: Mooresville WWTP	
Photographer: Kevin Stark	
Date: 11/12/2025	Time: 11:00:00 AM
Others Present: Holly Zurcher	
Location/Description: Secondary clarifier showing discoloration and solids leaving the system.	