



## REGION 10

SEATTLE, WA 98101

### RETURN RECEIPT REQUESTED

The Honorable Jeremy Grimm  
Mayor  
City of Sandpoint  
1123 Lake Street  
Sandpoint, Idaho 83864

Re: Expedited Settlement Agreement (ESA) for City of Sandpoint Wastewater Treatment Plant in Sandpoint, Idaho

Dear Mayor Grimm:

The U.S. Environmental Protection Agency (EPA) conducted a desk audit for the City of Sandpoint Wastewater Treatment Plant ("Facility") located at 723 South Ella Avenue, Sandpoint, Idaho on May 1, 2024 for compliance with its National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA). The desk audit reviewed the Facility's compliance through EPA's national database, the Integrated Compliance Information System, which contains information regarding discharge monitoring reports (DMRs) and other reports required to be submitted by the Permit. The desk audit and subsequent administrative records review indicated that the City of Sandpoint violated the December 1, 2017, National Pollutant Discharge Elimination System (NPDES) permit number ID0020842 ("Permit").

EPA has authority under section 309 of the CWA, 33 U.S.C. § 1319, to take enforcement actions, including seeking civil penalties, for the alleged violations specified in the enclosed Expedited Settlement Offer Worksheet Violation Form ("Violations Form"). At this time, rather than undertake a more traditional enforcement action for civil penalties, EPA is offering the Respondent the opportunity to enter into the enclosed Expedited Settlement Agreement (ESA), provided the Respondent (1) has corrected the deficiencies cited in the Violations Form and (2) agrees to pay the administrative civil penalty in the Violations Form.

EPA encourages the expedited settlement of easily verifiable and correctable violations, such as those identified in the Violations Form. You may therefore choose to resolve the violations identified on this Violations Form quickly, without protracted litigation, by correcting the violations and signing and returning the attached ESA, in which you agree to submit payment for the reduced quick settlement penalty of **\$3,450**. The ESA is issued in accordance with the [Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, and the Revocation, Termination or Suspension of Permits](#) at 40 C.F.R. Part 22.

In order to avail yourself of the ESA option, you must take the following steps within 30 days of your receipt of this letter:

1. Agree to correct all the violations identified in the Violations Form within 30 days of your receipt of this letter or an alternative time frame approved by EPA in writing. Please work with the Compliance Officer listed below to provide documentation of these corrections;
2. Return a digital copy of the signed Expedited Settlement Agreement by email to:

Nicolas Haddad, Compliance Enforcement Officer  
[haddad.nicolas@epa.gov](mailto:haddad.nicolas@epa.gov)

If you are unable to email these items, then return the signed original ESA by certified mail to:

Nicolas Haddad  
U.S. Environmental Protection Agency, Region 10  
1200 6<sup>th</sup> Avenue, Suite 155, 20-C04  
Seattle, Washington 98101

EPA will provide an opportunity for public comment on the ESA for 30 days. Assuming no public comments warrant a change to the ESA, EPA would then ask the Regional Judicial Officer to issue a Final Order approving the ESA. Within 10 days of your receipt of the Final Order, you must submit penalty payment in accordance with the instructions in the attached ESA and proof of payment to the Compliance Officer identified above.

We look forward to hearing from you.

Sincerely,

**EDWARD  
KOWALSKI** Digitally signed by  
EDWARD KOWALSKI  
Date: 2024.05.30  
12:10:55 -07'00'

Edward J. Kowalski  
Director  
Enforcement and Compliance Assurance Division

Enclosures

1. Expedited Settlement Agreement
2. Expedited Settlement Offer Worksheet Violations Form

cc: Deven Hull  
Operator

Mary Anne Nelson  
IDeq Surface and Wastewater Division Administrator

Troy Smith  
IDeq Compliance and Enforcement Supervisor