



July 14, 2025

By email: dhull@sandpointidaho.gov

Devin Hull, Wastewater Treatment Plant Supervisor
City of Sandpoint – Sandpoint WWTP
Sandpoint, ID 83864

Subject: Compliance Determination Letter – Sandpoint Wastewater Treatment Plant, Idaho
Pollutant Discharge Elimination System (IPDES) Permit ID0020842

Attention Mr. Hull:

This letter follows up from the Idaho Department of Environmental Quality (DEQ) regarding the Record of Resolution (ROR) submitted by the City of Sandpoint (Facility) for the items identified during the Compliance Evaluation Inspection, performed on March 19, 2025, and in the associated Inspection Cover Letter dated April 17, 2025.

The purpose of the inspection was to determine compliance with the Facility's Idaho Pollution Discharge Elimination System (IPDES) Permit ID0020842 (Permit) and the "Idaho Pollutant Discharge Elimination System Rules" (IDAPA 58.01.25). DEQ's compliance determination is outlined below.

The Facility provided the following ROR responses to the identified violations:

1. Emergency Response Plan Not Current

On May 19, 2025, the Facility stated that the Emergency Response Plan would be updated to reflect responsible positions. **By August 13, 2025 please update the Emergency Response Plan and provide a copy of the updates to DEQ through the IPDES E-Permitting System.**

2. DMR Reported Values Incorrect

On May 5, 2025, and May 14, 2025, via email exchanges, the Facility stated that the requirement of submitting PCB results has been completed as required in the Permit and that NODI Code 9 – Conditional Monitoring was used for monitoring periods when samples were not taken. **Due to the setup of the NetDMR Reporting System and the Facilities' correct usage of NODI Code 9, no further action is required as reporting for PCB analyses has been completed correctly.**

On May 19, 2025, the Facility stated that results for Cyanide, weak acid dissociable, would be confirmed with ATL Laboratory. **No further action is required.**

3. Analytical Methods not Sufficiently Sensitive

On May 19, 2025, the Facility stated that the laboratory was unable to meet the minimum level for lead. DEQ researched this requirement internally and found that the IPDES User Guide (Page 165, Section 12.3.2) outlines that if a test result is not meeting minimum levels as defined in the Permit, the result from using the most sensitive approved EPA method may be used. **Based on that information, no further action is required and analyses that are being completed under EPA's most sufficiently sensitive test methods are not in violation of the Permit.**

4. WET Testing Report Missing Elements

On May 19, 2025, the Facility stated that all required parameters will be attached with WET testing results when attached through E-Permitting. **No further action is required.**

5. Improper Operation and Maintenance

On May 19, 2025, the Facility provided the following updates to each portion of the facility that was outlined under this violation:

- Headworks Building (mold): The Facility contracted with a third party (North Idaho Flood and Dire) to remediate mold in the building.
- Skimming tank vault (aggregate on walls is degraded): The Facility contracted with a third party (Keller Associates) to develop a Preliminary Engineering Report to reconstruct all portions of the wastewater treatment plant.
- Underground pipes (leaking and degraded): The Facility is actively investigating the leaking pipe and plans to repair it.
- Breezeway pumps (leaking oil): The Facility stated that oil near the breezeway pumps was for routine maintenance purposes and confirmed that there are no active leaks.
- Chlorination basin (solids floating): The Facility has cleaned out the chlorination basin.
- Belt Press (degraded and temporary repairs implemented): The Facility has contracted with a third party (Stantec Consulting) to develop a Preliminary Engineering Report for the replacement of the belt presses.
- Effluent channel upstream of chlorination basin (contains debris and organic buildup): The Facility is actively searching for a third party contractor to install a new gate to prevent buildup as identified during the inspection.
- Aeration basin (causing increased turbidity): The Facility contracted with a third party (Keller Associates) to develop a Preliminary Engineering Report to reconstruct all portions of the wastewater treatment plant.

As many of the issues outlined above require complete reconstruction and the Facility has already contracted with third parties to complete Preliminary Engineering Reports, this violation is considered outstanding as the issues have not been fully addressed and implemented. Due to the nature of the projects, DEQ requests biannual updates (one due June 30 and one due December 31 each year) until the above construction has been

completed. **By December 31, 2025, and twice a year thereafter on the specified dates, please provide an update to the items outlined above, submitted to E-Permitting. This update should include the status of the projects and the anticipated construction completion dates.**

6. Inflow of Groundwater to Treatment Process

On May 19, 2025, the Facility stated that the groundwater introduced into the aeration basin is unable to be discharged without treatment as it emanates from the condensate off of the methane line on site. DEQ researched the precedent of groundwater being used part-way through the treatment process and determined that the groundwater pipe may stay in place until the Facility is reconstructed. At the time of the reconstruction, all groundwater impacted with pollutants from the treatment process must be rerouted to the headworks of the Facility. **No further action is required at this time; however, at the time modifications are performed at the Facility, the pipe must be rerouted to discharge at the headworks of the Facility.**

The Facility provided the following ROR responses to the identified areas of concern:

1. Compliance Schedule Missing Documentation

On May 19, 2025, the Facility provided a copy of the Compliance Schedule submission from the Chemical Feed Pilot attached to the Record of Resolution. **No further action is required.**

2. Quality Assurance and Quality Control Samples Inconsistent

On May 19, 2025, the Facility stated that a new Quality Assurance Plan will be drafted and that corrections on the PCB test results will be obtained. **By August 13, 2025, please update the Quality Assurance Plan and provide a copy of the updates to DEQ through the IPDES E-Permitting System.**

3. Flow Calibration Inconsistent

On May 19, 2025, the Facility stated that the Quality Assurance Plan will be updated. **By August 13, 2025, please update the Quality Assurance Plan and provide a copy of the updates to DEQ through the IPDES E-Permitting System.**

4. Submerged Matter Upstream of Effluent Discharge Channel

On May 19, 2025, the Facility stated that a third party contractor would be gating off the section of the unused effluent discharge channel. Due to the nature of the project, DEQ requests biannual updates (one due June 30 and one due December 31 each year) until the above construction has been completed. **By December 31, 2025, and twice a year thereafter as defined in the response for Violation #5, please provide an update to the effluent ditch gate, submitted to E-Permitting. This update should include the status of the project and the anticipated construction completion date.**

5. Control of Undesirable Pollutants

On May 19, 2025, the Facility stated that chemicals have been properly contained. **No further action is required.**

DEQ is providing this notice so the Facility may correct the remaining issues outlined above. Please provide the requested information or documentation by the required dates, through the IPDES E-Permitting System at: <http://www2.deq.idaho.gov/water/ipdes>.

DEQ appreciates your cooperation regarding this matter and encourages you to continue your compliance efforts. Responsibility for compliance with the IPDES permit rests with the permittee.

If you have any questions concerning this matter, please do not hesitate to contact me at (208) 666-4605 or chantilly.higbee@deg.idaho.gov.

Sincerely,

Chantilly Higbee

Digitally signed by Chantilly
Higbee
Date: 2025.07.14 14:47:46 -07'00'

Chantilly Higbee
IPDES Compliance Officer

c: James Craft, WW Compliance Bureau Chief, DEQ State Office
Katy Baker-Casile, Regional Engineering Manager, DEQ Coeur d'Alene Regional Office
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