Idaho Pollutant Discharge Elimination System
Wastewater Treatment Plant
Compliance Evaluation Inspection Report

Sandpoint, City of – Sandpoint WWTP

Permit Number: ID0020842
Inspection Date: March 19, 2025

Prepared by
Brandi Lowe - IPDES Compliance Officer

Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

Report Date: April 17, 2025

Idaho Pollutant Discharge Elimination System
Publicly Owned Treatment Works
Compliance Evaluation Inspection

Desk Review - Inspection Scheduling					
Facility name:	City of Sandpoint – Sandpoint WWTP	IPDES Permit #:	ID0020842	Announced?	☒Yes☐No
Date and time facility set for inspection:	March 19, 2025, at 10:00 a.m.				
Date contact occurred:	February 27, 2025	Contact phone #:	(208) 255-1568		
Contact name and title:	Deven Hull				
Contact email	dhull@sandpointidaho.gov				
Scheduling notes:	I emailed all listed Certifying Officials and Duly Authorized Representatives listed for the City of Sandpoint on E-Permitting including Amanda Wilson, Greg Lanning, Holly Ellis, Jeff Cowley, and Deven Hull. I set the date and time of the inspection for March 18, 2025, at 10:00 a.m. and explained that the inspection was routine. I immediately received automatic replies from Greg Lanning and Amanda Wilson that both representatives were no longer with the facility. Mr. Hull emailed me back on February 27, 2025, requesting that the inspection date be changed to March 19, 2025. I confirmed that the inspection would be conducted on March 19, 2025, at 10:00 a.m.				

Desk Review - Verification					
Permit effective date:	December 1, 2017	Date permit expires:	November 30, 2022	Admin. extended?	☒Yes ☐No
Permittee mailing address:	1123 Lake Street Sandpoint, ID 83864				
Permittee physical address:	723 South Ella Avenue Sandpoint, ID 83864				
Permittee email:	dhull@sandpointidaho.gov	POTW class:	Class IV Treatment System Class III Collection System		
Receiving water name:	Pend Orielle River	Any impairments:	Not supporting Cold Water Aquatic Life for the following parameters: • Dissolved gas supersaturation • Temperature		
Certifying official:	Amanda Wilson, Greg Lanning and Holly Ellis				
Inspection type:	☒State ☐Joint	Duly authorized representative:	Jeff Cowley and Deven Hull		
Date of last inspection:	April 10, 2019				
Identify critical issues from previous inspection:	The Previous Compliance Evaluation Inspection (EDMS 2019FAU64) identified the following Areas of Concern: 1) Effluent Flow Meter Calibration and Check Frequency Documentation Missing 2) Quality Assurance Plan did not Contain Minimum Requirements 3) Personnel not Trained in the Emergency Response and Public Notification Plan 4) Relinquishing Chain of Custodies Signature Missing 5) DMR Errors				

	On June 26, 2019, Jeff Cowley submitted a record of resolution (EDMS 2019FAU84) in response to the inspection report that outlined the following: • The Quality Assurance Plan was updated • Collection system operators and treatment plant operators were trained on the Emergency Response and Public Notification plan on May 22, 2019, and June 10, 2019, respectively • A request to update DMRs that contained errors as outlined in the inspection report On July 31, 2019, Jeff Cowley submitted a second record of resolution (EDMS 2019FAU109) in response to the inspection report that outlined the following: • The effluent flow meter was calibrated by Field Instruments and Controls on June 22, 2019, and weekly checks would be performed on the flow meter. At the time of the review of the previous submissions for the current inspection, the missing signatures on the relinquished field of the chain of custody were not addressed by the operators.
Are all reports, applications, and other information being submitted and signed by the certified ranking elected official or duly authorized representative only?	☒Yes ☐PEV 4.2.11

Desk Review - Plan Reviews	
SCP identifies materials, preventive measures, reporting system, trained operators, is complete and submitted timely?	☐Yes ☐PEV 3.0 ☐AOC ☒N/A
QAPP developed and submitted timely?	☒Yes ☐N/A ☐PEV 4.1.1 ☐AOC
Phosphorus Management Plan developed, complete, and submitted timely?	☐Yes ☒N/A ☐PEV 3.0 ☐AOC
Mercury Minimization Plan developed and submitted timely?	☒Yes ☐N/A ☐PEV 3.0 ☐AOC
Methylmercury Fish Tissue Monitoring Plan developed and submitted timely?	☒Yes ☐N/A ☐PEV 3.0 ☐AOC
O&M developed and current, kept on-site, available upon request?	☒Yes ☐N/A ☐PEV 4.1.2 ☐AOC
BMP plan developed, current, and submitted timely?	☐Yes ☒N/A ☐ PEV 3.0 ☐AOC
Sludge Management Plan or Biosolids Management Plan current and submitted?	☐Yes ☒N/A ☐ PEV 2.1.3 ☐AOC
Annual Inflow and Infiltration Evaluation developed and submitted timely?	☐Yes ☒N/A ☐PEV 3.0 ☐AOC
Is the I&I Evaluation complete?	☐Yes ☒N/A ☐PEV 3.0 ☐AOC
Emergency Response Plan Notification current, developed, and submitted timely?	☐Yes ☒PEV 4.1.3 ☐AOC

Plan Reviews notes:	The QAPP did not include information relevant to currently accepted Standard Methods and was missing information regarding quality control measures (see "Inspection – Laboratory" section below). The Mercury Minimization Plan was reviewed on site, during the inspection. The Methylmercury Fish Tissue Monitoring plan was reviewed on site. As total effluent mercury concentrations have not exceeded 0.027 micrograms per liter, monitoring has not been conducted. The Methylmercury Fish Tissue Monitoring Plan was submitted to DEQ on November 30, 2018 (EDMS 2018FAP244). The Emergency Response Plan was not current with respect to the current notification list as the previous public works director was listed as the main point of contact during emergencies (Appendix B). The O&M Plan was reviewed on site, during the inspection. A BMP Plan was not required by the permit.

Desk Review - Report Reviews	
Annual Receiving Water Monitoring Report submitted for all previous years' surface water monitoring parameters?	☒Yes ☐N/A ☐PEV 2.1.4
Annual Mercury Status report submitted timely and complete?	☐Yes ☒N/A ☐PEV 3.0 ☐AOC
Annual Phosphorus Management report submitted timely and complete?	☐Yes ☒N/A ☐PEV 3.0 ☐AOC
Current Master List of nondomestic users was developed and submitted in permit cycle.	☒Yes ☐N/A ☐PEV 3.0 ☐AOC
Receiving water monitoring station approval request submitted and complete?	☒Yes ☐N/A ☐PEV 3.0 ☐AOC
Annual Sludge Depth report has been submitted timely?	☒Yes ☐N/A ☐PEV 2.1.3 ☐AOC
Annual Waste Sludge Generation report (conventional plants) current and submitted timely?	☒Yes ☐N/A ☐PEV 2.1.3 ☐AOC
Annual Receiving Water Monitoring RAW results submitted and in spreadsheet form?	☐Yes ☒N/A ☐PEV 2.1.4 ☐AOC

Report Reviews notes:	Quarterly surface water samples for total mercury, conductivity, dissolved copper, dissolved organic carbon, dissolved lead, total ammonia as N, temperature, pH, and total hardness were reported to DEQ for the following years: • 2019 (EDMS 2020FAP181) • 2020 (EDMS 2021FAP86) • 2021 (EDMS 2022FAP1169) Samples for the forementioned parameters were discontinued after 12 samples were taken as outlined in Permit Section I.D.11.b. Biannual PCB congeners are required to be taken biannually for surface water monitoring in addition to the previously mentioned parameters. On July 20, 2018, the City of Sandpoint submitted correspondence that explained the permit did not specify the start date of sampling but did take the first sample on June 10 and 11, 2018 (EDMS 2018FAP24). On August 15, 2018, DEQ issued a notice of noncompliance as the first PCB congener was measured with the incorrect method as defined in Permit Section I.B.12 (EDMS 2018FAP40). The first PCB congener sampled from the receiving water with appropriate methods was collected on August 29, 2018 (EDMS 2018FAP177). The second PCB congener sampled from the receiving water with appropriate methods was collected on December 3, 2018 (EDMS 2019FAP71). On October 15, 2018, The City of Sandpoint requested reduced surface water sampling locations as they believed the cross-sectional location of four samples was well mixed (EDMS 2018FAP141). DEQ denied the reduced sample location frequency on November 2, 2018, as the sampling was required for future upstream results (EDMS 2018FAP176). Previous to the site inspection, Ms. Higbee explained that the 2024 Surface Water Monitoring Report had outdated information and was missing the method detection limit and requested that the report be resubmitted with accurate contents and references for the correct year. Facility representatives resubmitted the 2024 Surface Water Monitoring Report on April 3, 2025, (EDMS 2025FAP556) and the resubmittal was satisfactory.

Desk Review - Discharge Monitoring Reports	
Were DMRs discussed during the on-site inspection?	☒Yes ☐No
DMR calculations performed accurately	☒Yes ☐PEV 2.2 ☐N/E
DMR reported values match bench sheet values?	☐Yes ☒PEV 2.0 ☐N/E

Round-off and significant figures properly used in calculations?	☐Yes ☒PEV 1.0 ☐N/E
DMRs have been submitted and timely:	☒Yes ☐ PEV 2.2.3 ☐N/E
DMR notes:	DMR results, bench sheets, and chain of custodies for December 2023 and May 2023 were reviewed on site. One sample for carbon, dissolved organic [as C] for July 2023 was reported as "NODI Code P – Laboratory Error – Invalid Test". The Operators on site confirmed that this NODI code was correct as there was a laboratory error during that sampling period. Cyanide, weak acid dissociable has been reported as "<0.01" µg /L (November 2023 – May 2023 reporting periods), "10" µg /L (May 2024 reporting period), and "<1" µg /L (November 2024, August 2023). Upon reviewing the laboratory results, the significant figures were not correctly entered as the lab had reported values in g/L in some instances while the DMR required units in µg/L (Photograph 1). All testing should be completed at a minimum level of "10 µg/L" and units should be converted when data is entered into NetDMR. Arsenic has been reported as "<1 µg/L" on all DMRs since the beginning of the permit issuance cycle, however, the minimum level listed in Appendix A of the Permit is "0.5 µg/L". Lead was reported as "<1" µg /L from the May 2023 to November 2024 DMR submissions, however, the minimum level listed in Appendix A of the permit is "0.16 µg/L". Polychlorinated biphenyls [PCB] for upstream monitoring has been recorded as NODI Code 9 historically, however, samples are being taken and submitted via E-Permitting. Since samples are being taken, "NODI Code 3 – Special Report Attached" should be used with the attached test results. 2,3,7,8 TCDD was measured on the following dates: December 3, 2018 (EDMS2019FAP71) June 4, 2019 (EDMS 2019FAP773) November 6, 2019 (EDMS 2020FAP129) Values of the influent and of the effluent for all three sample dates were "non-detect" so monitoring was discontinued per the Permit Section I.B.13.c.

Desk Review - Whole Effluent Toxicity

Was WET Testing reviewed, if required, during the onsite inspection?	☒Yes ☐No
WET testing follows monitoring and reporting requirements from IPDES permit Table 16?	☐Yes ☒PEV 3.0
All WET quality assurance criteria are in accordance with their IPDES permit as outlined in WET Quality Assurance?	☒Yes ☐PEV 3.0
Toxicity Reduction Evaluation (TRE) strategy submitted 30–60 days prior to WET test initiation?	☐Yes ☒N/A
WET results submitted within 30 days of receiving lab results?	☒Yes ☐PEV 3.0
Have WET limits been set?	☐Yes ☒No
WET testing has exceeded established WET limits?	☒No ☐ PEV 3.0 ☐ N/A
If required, has TRE strategy been initiated within 15 days of receiving sample results?	☐Yes ☐PEV 3.0 ☒N/A
If required, has accelerated testing been implemented?	☐Yes ☐PEV 3.0 ☒N/A
WET Testing notes:	WET Testing was performed on the following dates during this permit issuance cycle: • 2018 – 3/19/2018 (Quarter 1) • 2019 – 6/24/2019 (Quarter 2) • 2020 – 7/5/2020 (Quarter 3) • 2021 – 10/31/2021 (Quarter 4) • 2022 – 3/21/2022 (Quarter 1)

	• 2023 – 6/12/2023 (Quarter 2) • 2024 – 7/22/2024 (Quarter 3) WET Test results for all previous WET Test samples did not include the flow rate at the time of each sample collection or results of the monitoring required in part I.B of the permit for parameters with a required monitoring frequency of once per quarter or more frequently including: • Flow • BOD5 • TSS • pH • E. coli • Total Residual Chlorine • Mercury, total • Phosphorus, Total as P • Ammonia, Total as N • Nitrate + Nitrite • Total Kjeldahl Nitrogen • Soluble Reactive Phosphorus • Conductivity • Dissolved Organic Carbon • Hardness, total

Desk Review - Compliance Schedule	
Were any Compliance Schedule Milestones discussed during the on-site inspection?	☒Yes ☐No
Permittee has notified DEQ within 14 days following each task due date, whether compliance or noncompliance with the interim or final requirement has been attained?	☒Yes ☐PEV 3.0 ☐AOC
Has permittee failed to meet a compliance schedule milestone by over 90 days?	☐ No ☐PEV 3.0 ☒AOC
Compliance schedule annual report is complete and submitted timely?	☐Yes ☐PEV 3.0 ☒N/A
Compliance Schedule notes:	In a letter submitted to DEQ on November 27, 2019, the operators stated that they would like to pursue option #1 listed in the permit to achieve compliance with final effluent limitations by November 30, 2022, by upgrading the existing plant (EDMS 2019FAP1168). An official PER was submitted by the City on June 11, 2019, and was accepted by DEQ satisfying the requirement in Permit section II.F.6.b (2023FAP204). Documentation was not found in DEQ's database for the requirements outlined in Permit sections II.F.6.c (final plans and specifications) and II.F.6.d (completion of plant upgrade).

Opening Conference - Arrival and Entry					
Date and arrival time of inspection:	March 19, 2023, at 10:00 a.m.				
DEQ officer:	Brandi Lowe	Weather conditions:	Cloudy, ~37°F		
Full access granted?	☒Yes ☐PEV 4.2.9		Permit on-site?	☒Yes ☐PEV 4.2.10	
Facility representative and title:	Deven Hull, Wastewater Treatment Plant Supervisor		Phone and email:	(208) 255-1568 dhull@sandpointidaho.gov	
Facility representative and title:	Holly Ellis, Public Works Director		Phone and email:	(208) 946-2087 hellis@sandpointidaho.gov	

Others present:	Chantilly Higbee, IPDES Compliance Officer, DEQ	Phone and email:	(208) 666-4605 chantilly.higbee@deq.idaho.gov
Did permittee provide all documents as requested and timely?			☒Yes ☐PEV 4.2.8 ☐N/A
Opening Conference - Bypass			
Has facility experienced bypass since the previous inspection?			☒Yes ☐No
If any anticipated bypass occurred since the previous inspection was DEQ notified 10 days in advance of bypass?			☐Yes ☐PEV 4.2.12 ☒N/A
Anticipated bypass caused effluent exceedance?			☒No ☐PEV 1.2
Did unanticipated bypass cause effluent limit exceedance?			☐No ☒PEV 1.2
Was DEQ notified within 24 hours?			☒Yes ☐PEV 2.2.7 ☐N/A
Was 5-day written notice provided?			☒Yes ☐PEV 2.2.8 ☐N/A
Describe the bypass flow layout and what treatment processes are bypassed. Identify the reason for bypass to occur and the measures being taken to prevent future bypasses:	The facility does not have a formal bypass system; however, wastewater treatment is bypassed when there is high inflow and infiltration from the lift station in the middle of the plant (connecting primary clarifiers to the breezeway pumping station) as reported during the last upset on February 24, 2025 (EDMS 2025FAP546). When high flow occurs, wastewater that is in the open channel being pumped to the breezeway overflows into the historic chlorine contact basin which is attached to the effluent of the facility (Photograph 2). As there is no physical barrier to prevent wastewater from entering the effluent, if inflow to the plant exceeds what the pumps can handle, bypass of the treatment past the primary clarifiers is unavoidable without construction and permanent changes to the facility. Operators stated that the bypass that occurs in this location is due to a capacity issue at the plant as the pumps are able to keep up with routine, dry weather flow, but not when there is wet weather flow.		
Opening Conference - Other Plant Issues			
Have all occurrences of SSOs been reported?			☐Yes ☐PEV 2.2.7 ☒N/A
Have all occurrences of upsets been reported?			☒Yes ☐PEV 2.2.7 ☐AOC
Did the 5-day report get submitted for any upsets that have occurred?			☒Yes ☐PEV 2.2.8 ☐N/A
Did permittee comply timely and with adequate remedial measures for any upsets? (Duty to mitigate)			☒Yes ☐PEV 4.2.4 ☐AOC ☐N/A
Have all instances of OTHER noncompliance been reported as 24-hour notices of noncompliance?			☐Yes ☐PEV 2.2.7 ☒N/A
Have any anticipated noncompliance events occurred that were not reported as required?			☐No ☐PEV 4.2.16 ☒N/A
Has facility experienced any issues with toxic pollutants in their effluent, outside the scope of their permit requirements?			☒No ☐PEV 4.2.17 ☐ N/A
Fish kill caused by discharge?			☒No ☐PEV 2.2.9 ☐N/A
Have there been any issues with the Pretreatment program outside of the annual report or the implementation thereof?			☒No ☐PEV 3.7 ☐N/A
Have there been any issues with the implementation of the Pretreatment program?			☒No ☐PEV 3.7.1 ☐N/A
Have there been any issues with the completion, submittal, or timeliness of the Pretreatment Annual Report?			☒No ☐PEV 3.7.9 ☐N/A
Were all instances of *OTHER* noncompliance followed up with a 5-day written notice?			☒Yes ☐PEV 2.2.8 ☐N/A
Plant Issue notes:	Effluent Exceedances listed in NetDMR were reported by the facility in the last two years for the following months:		

- June 2023 (E. coli exceedance)
- December 2023 (TSS exceedance, E. coli exceedance, BOD5 percent removal)
- January 2024 (E. coli exceedance)
- February 2024 (E. coli exceedance, BOD5 percent removal)
- March 2024 (BOD5 percent removal)
- December 2024 (BOD5 day exceedance, BOD5 percent removal)

All exceedances listed are accompanied by a 24-hour report if the exceedance was due to an upset or bypass with the exception of the December 2024 BOD5 incident as there were no associated upsets or bypasses during that month. The operators explained that the BOD5 has historically been an issue as the facility also has groundwater that infiltrates the system and the excess non-wastewater causes issues when trying to establish a percent removal as the actual wastewater is diluted.

Six 24-Hour Noncompliance Reports were reported by the facility in the last two years on the following dates:

- June 13, 2023 (E. coli exceedance due to high flows – 2023FAP1364)
- December 12, 2023 (E. coli exceedance due to high flows – 2023FAP2252)
- January 31, 2024 (E. coli exceedance due to high flows – 2024FAP495)
- February 6, 2024 (E. coli exceedance due to high flows – 2024FAP639)
- February 24, 2025 (upset due to SCADA failure causing untreated wastewater to bypass secondary treatment before being discharged – 2025FAP546)
- March 17, 2025 (E. coli exceedance due to high flows – 2025FAP708)

No Sanitary Sewer Overflows were reported by the facility in the last two years.

One noncompliance event referred to as an upset was reported to DEQ on February 24, 2025, via the 24-Hour Noncompliance Hotline. A Notice of Deficiency was issued to the facility on March 7, 2025, indicating that the facility must provide further details to establish the "upset condition" a response to that letter was submitted by the facility on April 3, 2025 (EDMS 2025FAP784).

Facility operators stated that they would like clarification for when to report issues at the plant as different regulatory representatives (from EPA and DEQ) have given different directions on when to report exceedance events, upsets, and bypasses (See Recommendations in the Summary section of this inspection report). The operators stated they were happy to give updates for every instance, but that they were historically told they were doing too much reporting.

Opening Conference - Pollution Prevention

Does facility have a *FORMAL WRITTEN* and implemented policy regarding pollution prevention?	☐Yes ☒No
Describe facility source reduction, recycling, waste treatment and waste disposal that standout as separate practices that may benefit other facilities (i.e., overflow alarms, fog/halo spray rinsing, dragout collection trays, air jet curtains, electrolytic recovery, biocide additions, etc.).	No formal policy regarding pollution prevention exists at the facility, however, the operators feel that the surrounding community is well versed in the wastewater treatment process as there have been many efforts to educate the public. Specific programs for reducing inflow and infiltration have been implemented including presentations to the public, door-to-door discussions regarding the collection system, and a practice implemented by the city that houses sold must be inspected for inflow and infiltration sources to the collection system. All programs related to the inflow and infiltration education work to reduce total inflow to the facility of non-wastewater.
P2 notes:	None

Opening Conference - Collection System

Are there any sewer districts or additional municipalities discharging to the POTW?	☐Yes ☒ No
Does the POTW have sewer use ordinances and appropriate memorandum of agreements in place?	☐Yes ☐AOC ☒N/A
Are lift stations and collection lines being maintained frequently enough to prevent recurring SSOs?	☒Yes ☐PEV 4.2.5 ☐AOC
Collection system inspected for wear and failure and deficiencies are identified and addressed appropriately and timely including I&I sources?	☒Yes ☐PEV 3.0 ☐AOC
Are there acute sources of I&I that have been identified but have not been addressed?	☐No ☐PEV 3.0 ☒AOC ☐N/A

Collection System notes:	The city has been actively addressing inflow and infiltration (I&I) issues within its wastewater collection system since 1995. This effort has evolved over time, incorporating assessments, public education, routine maintenance, strategic repairs, and a formal replacement plan. Key components of this strategy include mainline and lateral replacements, a dedicated annual budget, and ongoing public outreach. Approximately 25% of the identified I&I problem areas in the mainline have been addressed, along with significant work on private lines. Approximately $200,000 is budgeted every year to address ongoing collection system issues. Individual efforts and programs are highlighted below outside of routine maintenance conducted by the City: Sewer Lateral Improvement Plan: When houses are sold that are within the collection system, the laterals are inspected and repaired if needed to reduce I&I. Since the inception of the program, approximately 100 laterals have been replaced and 300 have been repaired. Public Education and Outreach: In 2018, there was a mass effort where operators went door-to-door discussing inflow and infiltration with flyers. The city maintains information regarding I&I on their website continuously and often implements educational outreach projects for residents. As of April 3, 2025, the City's Website contained the following topics regarding the wastewater treatment plant and collection system: • Sewer Lateral Improvement Plan (SLIP) Information • Sewer Rules and Regulations • Wastewater Collection Improvement Plan • Wastewater Treatment Facility Plan Upcoming Collection System Plan: During the Summer of 2025, the operators plan to replace 20 lateral collection lines in identified I&I problem locations.

Inspection - Laboratory	
Does permittee use its own on-site lab?	☒Yes ☐No
QAPP is written and comprehensive as necessary and available for review upon request?	☒Yes ☐PEV 4.1.1 ☐AOC
Indicate all issues with the QAPP:	The Guidance for Quality Assurance Project Plans (EPA/QA/G-5) is outlined in the Permit as a guide for the QAPP. The document describes that a QAPP should list quality control checks for each sample type. The QAPP contained the following overview regarding quality assurance and quality control samples: *"Routine analyses of blanks, duplicates, and standard solutions are performed at a minimum according to the frequency shown in."*

	There was no additional information or reference to the quality control and quality assurance samples in the overview, however, samples for Total Suspended Solids and pH were explained to be run monthly.
Laboratory custodian logs in all samples properly and stores properly as required?	☒Yes ☐PEV 4.1.1 ☐AOC
Laboratory-grade water is used?	☒Yes ☐PEV 4.1.1
Work area and monitoring equipment are clean, sampling equipment and glassware are properly cleaned and stored to prevent contamination?	☒Yes ☐PEV 4.2.5 ☐AOC
Are lab quality controls being used? i.e. spikes, duplicates, etc.	☐Yes ☐PEV 2.1.6 ☒AOC
Round-off & significant figures properly used in calculations?	☒Yes ☐PEV 2.2
Sample shipping and handling protocol is in QAPP and being followed?	☒Yes ☐PEV 4.1.1 ☐AOC
Incubator (fecal coliform) maintained at 44.5 °C ± 5°C, BOD incubator maintained at 20.0 °C ± 1 °C, and refrigerated samples maintained at ≤ 6.0 °C?	☒Yes ☐PEV 4.2.5 ☐AOC
QAPP identifies all tests methods which are approved under 40 CFR Part 136?	☒Yes ☐PEV 2.1.6
If an alternative test method has been approved by EPA, is documentation available to DEQ upon request?	☐Yes ☒N/A
pH buffers are within their expiration dates?	☒Yes ☐PEV 4.2.5 ☐AOC
Is the pH meter being calibrated?	☒Yes ☐PEV 4.2.5
pH meter calibrated per QAPP	☒Yes ☐PEV 4.1.1 ☐AOC
pH calibrations and maintenance are documented and logged	☒Yes ☐PEV 4.2.10 ☐AOC
All other monitoring equipment properly cleaned and calibrated?	☒Yes ☐PEV 4.2.5 ☐AOC
Chain of custody complete/accurate/accompany samples throughout process?	☒Yes ☐PEV 4.1.1
Indicate issues with chains of custody:	No issues were observed with the chain of custodies (Photograph 3).
Lab notes:	DMR Submission for Carbon, dissolved organic [as C], during the July 2023 reporting period was listed as NODI Code "P" – Laboratory Error/Invalid Test.

Inspection - Contract Laboratory

Does the permittee contract with an outside lab?	☒Yes ☐No
Indicate name of lab, location and state where located:	Metals: Accurate Testing Labs - Couer d'Alene, ID PCBs, Dioxin: ALS Environmental - Houston, TX Low Level Mercury: Anatek Labs - Moscow, WA WET Testing: Seacrest Labs - Louisville, CO
Laboratory custodian logs in all samples, stores at proper temperature. If samples are dropped off at an unattended location, do samples have custody seals and refrigerated as necessary. Samples are secured from general public?	☒Yes ☐PEV4.1.1 ☐AOC
Were there any issues regarding the COC, test methods on COC or reporting issues with COC?	☒No ☐PEV 4.1.1
Indicate issues with chains of custody:	None
Contract Lab notes:	Facility operators stated that there are multiple issues with the local labs such as incorrect reporting values, reports that are issued with incorrect information, and holding time problems from shipping samples.

Inspection - Additional Monitoring

Has the permittee performed additional monitoring outside the scope of the requirements in their permit?	☒Yes ☐No

If these additional samples are analyzed per 40 CFR Part 136, or as specified in their permit, the results must be used in their permit calculations and reported on applicable DMRs. Is this occurring?	☒Yes ☐PEV 2.2.6
Additional Monitoring notes:	Facility operators stated that they are reporting all additional samples that are being taken if they are taken according to approved methods and monitoring locations.

Inspection – Influent Sampling

Are influent samples being taken?	☒Yes ☐No
Describe influent sampling location and equipment used:	Samples are being taken immediately after the band screed in the headworks building through a pipe system that is transported immediately to the laboratory fridge.
Influent sampling occurs at DEQ-approved monitoring site locations identified in IPDES permit Table 1?	☒Yes ☐PEV 1.2
Influent samples are collected at frequency and sample type as required?	☒Yes ☐PEV 2.0
Influent monitoring is performed as identified and described in the facility's QAPP, are representative and sufficiently sensitive methods are used?	☒Yes ☐PEV 2.0
Influent Sampling notes:	

Inspection - Influent Flow Monitoring

Is influent flow monitoring required?	☐Yes ☒No
Influent flow is measured and reported as outlined in IPDES permit?	☐Yes ☐PEV 2.1.1 ☒N/A
Influent flow monitored at location specified in IPDES permit?	☐Yes ☐PEV 1.2 ☒N/A
Is influent flow measured in a closed-channel (pipe)?	☐Yes ☐No ☒N/A
Indicate closed-channel flow measurement device.	☐ Magmeter ☐Pitot ☐ Venturi ☐ Paddle wheel ☐ Doppler ☐ Transit-time ☒N/A
Is flow meter being calibrated and maintained per manufacturer's recommendations?	☐Yes ☐PEV 4.2.5 ☒N/A
Identify last calibration date, frequency and who performs it:	N/A
Is influent flow measured in an open-channel (flume or weir)?	☒Yes ☐No
Indicate open-channel primary device i.e., Parshall flume, Palmer-Bowlus, weir, etc.	18” Parshall Flume
Indicate secondary device i.e., floats, electronic flow meter, ultrasonic transducer, etc.	N/A
Flume or weir is free of corrosion, algae, scale and water velocity is constant and smooth?	☒Yes ☐PEV 4.2.5 ☐N/A
Are flow meter calibration and calculation methods documented correctly in QAPP and being implemented?	☐Yes ☐PEV 4.1.1 ☒N/A
Influent Flow Monitoring notes:	Flow is being measured at the influent of the facility with a Parshall flume, however, all flows that are being reported for the permit are being collected at the effluent.

Inspection - Conventional Treatment System	
Does the facility have a conventional treatment system?	☒Yes ☐No
Inspection - Conventional Treatment - Preliminary Treatment	
Headworks screening and/or grit removal process have no issues?	☒Yes ☐PEV 4.2.5
Identify the issues that are present:	☐Influent pumps ☐FOG build-up ☐Floating debris ☐Screens clogging ☐Cutter issues ☒Other
Identify the final disposition of the screening/grit coming out of the headworks	Grit is picked up by Waste Management and is taken to the transfer station.
Inspection - Conventional Treatment - Primary Treatment – Sedimentation And Settling	
Are sedimentation chambers or tanks used?	☒Yes ☐No
Are there any issues with sedimentation chambers?	☒No ☐ PEV 4.2.5
Are primary clarifiers used?	☒Yes ☐No
Are there any issues with primary clarifiers?	☒No ☐ PEV 4.2.5
Describe issues with primary clarifiers:	☐Scum layer ☐Heavy grease/bubbles on surface ☐Odors ☐Weir damage ☐Not level
Are septic tanks or vaults used?	☒Yes ☐No
Are there any issues with the septic tanks or vaults?	☐No ☒ PEV 4.2.5
Describe the issues with the vaults or septic tanks:	A skimming tank vault is on site for holding floating material taken from the primary clarifiers. The vault is manually pumped out daily. Upon inspection, concrete aggregate is visible along the walls of the vault (Photograph 4).
Preliminary and Primary Treatment notes:	Band Screens and a backup Vulcan bar screen are used for initial debris removal. The primary clarifier and the headworks building were constructed in 1957 and the headworks building currently has black mold issues.
Inspection - Conventional Treatment - Secondary Treatment – Biological	
Is secondary treatment used?	☒Yes ☐No
Secondary clarifiers or aeration basins are used?	☒Yes ☐No
Are there issues with secondary clarifiers or aeration basins?	☐No ☒ PEV 4.2.5
Describe any issues with secondary clarifiers or aeration basin:	☐Scum levels ☐Bubbles or grease on surface ☐Odors ☐Foam ☐Diffuser ☐Aerator malfunction ☒Other
Are trickle filters or fixed media systems used?	☐Yes ☒No
What media type is used in the trickle filter? Activated bio-filter, rock, slag, geotextiles, sand/gravel, compost, coconut shells, plastic, glass, peat, wood, etc.	Trickle filters on site were built in 1973 but are no longer used.
Are there any issues with the trickle filters or fixed media?	☒No ☐PEV 4.2.5
Describe issues with trickle filter or mixed media. i.e., flow channeling, nozzle malfunction, sloughing, flies/snails	N/A – not used
Are rotating biological contactor (RBC) used or an Integrated Fixed Film Activated Sludge (IFFAS) system?	☐Yes ☒No
Are there issues with this system?	☒No ☐PEV 4.2.5
Describe the issues with RBC or IFFAS. i.e., sloughing, excessive biomass, media panels, etc.	N/A – not used
Are oxidation ditches or other activated sludge systems used?	Aeration basins are being used. ☒Yes ☐No
Describe type of activated sludge system:	☐Plug-flow ☐Step feed ☐Oxidation ditch ☐Membrane bio-reactor ☒ Aeration basins ☐ Other
Are there any issues with the activated sludge system? i.e., mixing, solids, pumps, aerators, foaming, plugging?	☒No ☐PEV 4.2.5

Secondary Treatment notes:	During normal, dry weather flows, the operators see effective treatment with the current served community. Increased flow, whether from future population growth, or wet weather instances, causes concern as secondary treatment shows signs of overcapacity. During increased flow, turbidity increases in the secondary treatment portion of the plant. Operators stated that the clarifiers are relatively shallow (8 feet along the outside edge) and struggle to keep up with the treatment process. Other instances that cause issues at the secondary treatment include the addition of detergent products. Occasionally when the operators notice issues during dry weather, they have attributed it to soap and detergent that has entered the collection system. The secondary treatment basins show wear due to the age of the system. Recently, one section of digested sludge pipe had to be completely replaced as it was completely deteriorated. Overall, the aeration basin can handle routine, dry weather flows but does not perform adequate treatment of wet weather or additional, nonroutine flows. Upon inspection, a pipe was present on the north corner of the aeration basin. Operators explained that this pipe delivers pumped groundwater to the aeration basin as there is no other place for the groundwater to go (Photograph 5).

Inspection - Conventional Treatment – Tertiary - Chlorination	
Does facility use a chlorine disinfection system?	☒Yes ☐No
What type of chlorine treatment is used:	☐calcium hypochlorite (tablet) ☐sodium hypochlorite (liquid) ☒Cl_2 gas ☐Other
Specify Other:	None
Are there any issues with the chlorine system?	☐No ☒PEV 4.2.5 ☐AOC
Indicate what issues are present with the chlorine system	The operators explained that when E. coli values increase, chlorine is increased which occasionally causes TRC exceedances. During the site inspection, floating solids in the chlorine contact chamber were observed (Photographs 6 and 7).

Inspection - Conventional Treatment - Dechlorination System	
Does facility use dechlorination system?	☒Yes ☐No
Indicate type of dechlorination used:	☒Sulfur dioxide ☐Sulfite salts ☐Carbon adsorption ☐H_2O_2
Are there any issues with the dechlorination system?	☒No ☐PEV 4.2.5 ☐AOC
Dechlorination notes:	Operators expressed that dichlorination of the chlorinated effluent is occasionally frustrating as they are responding to varying levels of chlorine due to varying levels of E. coli which can all be impacted by non-routine flows.

Inspection – Conventional Treatment – Advanced Treatment	
Does facility use any advanced treatment?	☐Yes ☒No
Indicate type of advanced treatment used:	☒P removal ☐N removal ☐ rapid infiltration ☐ carbon adsorption ☐ ion exchange ☐ ammonia stripping ☐ gravity filter suspended solids ☐ pressure filter suspended solids
Advanced Treatment notes:	Facility operators implemented the Chemical Feed Pilot Project for phosphorus removal that was utilized during the compliance schedule for phosphorus limits, however, the project is no longer active as the phosphorus in the effluent is not exceeding permitted limits without the treatment.

Inspection - Sludge Volume Reduction - Thickening and Dewatering	
Does facility use thickening and dewatering processes for sludge volume reduction?	☒Yes ☐No
Identify the thickening processes being implemented:	☐Gravity thickening ☐Flotation thickening ☐Gravity drainage belts ☐Perforated rotating drums ☐Centrifuges ☒Other
Select the type(s) of dewatering processes being implemented:	☐Lagoon settling ☐Drying beds ☐Centrifuges ☒Filter press ☐Other
Specify Other:	Wastewater byproducts are thickened with a belt filter press after treatment from the anaerobic digester.
Briefly describe the sludge thickening and dewatering system:	There are three different pathways for waste to end up at the anaerobic digester. 1. Primary sludge is pumped directly to the anaerobic digester. 2. Sludge from the waste activated sludge (WAS) is sent to the rotary screen thickener before being pumped to the anaerobic digester. 3. Industrial waste is pumped to a holding tank before being transported to the anaerobic digester. The anaerobic digester burns methane gas as a biproduct of the treatment. After anaerobic digestion, belt presses are used to extract moisture from the solids. Solids are either disposed of by Waste Management to a landfill or are field applied.
Were any issues identified with thickening or dewatering?	☐No ☒PEV 4.2.5 ☐AOC
Thickening and Dewatering Notes:	Upon inspection, the belt presses used were showing signs of wear. Metal portions of the belt press were rusting and degrading and portions of the equipment were held together by wrenches and tie-downs (Photographs 8 and 9).

Inspection - Sludge Volume Reduction - Biological and Chemical Stabilization	
Does permittee use any biological or chemical stabilization?	☒Yes ☐No
What type of biological stabilization is used?	☒ Anaerobic digestion ☐ Aerobic digestion ☐Composting ☐ Vermistabilization ☐Other
What type of chemical stabilization is used?	☐Lime ☐Cement kiln dust ☐Alkaline ☐Other ☒N/A
Specify other:	N/A
Were any issues identified with either biological or chemical stabilization?	☒No ☐PEV 4.2.5 ☐AOC
Is there any other sludge treatment used?	☐Solidification ☐Immobilization ☐Metal stripping ☐ Toxic organic destruction ☐High heat ☐Irradiation ☐Alkalinity ☐Other
Specify other:	None
Were any issues identified with 'other' sludge treatment?	☒No ☐PEV 4.2.5 ☐AOC

Inspection – Effluent - Effluent Sampling	
Are effluent samples taken per the required and established frequency?	☒Yes ☐PEV 2.0
Describe effluent sampling location and equipment used:	Prior to the Parshall flume in the effluent channel after the dichlorination.
Effluent sampling occurs at DEQ-approved monitoring site locations identified in IPDES permit Table 1?	☒Yes ☐PEV 1.2
Effluent samples are representative to time, location, and type?	☒Yes ☐PEV 2.1

Effluent monitoring is performed as identified and described in the facility's QAPP?	☒Yes ☐PEV 4.1.1
Are influent and effluent samples taken at same time or as reasonably as can be expected?	☒Yes ☐PEV 2.1 ☐N/A
Has permittee conducted additional effluent sampling for permit renewal, without issues?	☒Yes ☐PEV 2.1.5 ☐N/A
Effluent Sampling notes:	None
Inspection – Effluent - Effluent Flow Monitoring	
Is effluent flow monitoring required?	☒Yes ☐No
Effluent flow is monitored and reported as outlined in the Permit?	☒Yes ☐PEV 1.2
Effluent flow is monitored at approved location or as specified in the Permit?	☒Yes ☐PEV 1.2☐AOC
Is effluent flow measured in a closed-channel?	☐Yes ☒No
What type of closed-channel device is used?	☐ Magmeter ☐Venturi meter ☐Pitot tube ☐ Paddle wheel ☐Doppler ☐Transit-time meter ☒ N/A
Effluent flow meter calibrated and maintained per manufacturer's recommendations?	☐Yes ☐PEV 4.2.5 ☒ N/A ☐AOC
Effluent flow meter calibration methodology is documented in the QAPP?	☐Yes ☐PEV 4.1.1 ☒N/A
What was last calibration date, frequency of calibration, and who performs it?	July 22, 2019 by Field Instruments and Controls
Is effluent flow measured in an open-channel?	☒Yes ☐No
Identify the open-channel primary device:	☒ Flume ☐Weir ☐Other
Specify other:	Parshall Flume
Identify the open-channel secondary device:	☐ Floats ☐Gauges ☒Ultrasonic transducers ☐Bubblers ☐Manually ☐Other
Effluent flow measured as documented in the QAPP?	☐Yes ☐PEV 4.1.1 ☒AOC
Primary device such as flume or weir is free of corrosion, algae, scale and water velocity is constant and smooth?	☒Yes ☐PEV 4.2.5
Secondary device is calibrated, maintained, and in operating condition?	☒Yes ☐PEV 4.2.5
Have any non-authorized outfalls been located?	☒No ☐PEV 1.1
Has facility discharged outside of timeframe(s) authorized in the Permit?	☒No☐PEV1.1☐N/A
Effluent Flow Monitoring notes:	The facility's QAPP does not mention flow calibration, but the O&M Overview indicated the following: *"…The flume is checked for calibration whenever an issue is suspected. Comparing influent totals to effluent totals provides an indication that something is wrong if the totals are not close."* No routine flow measurement calibration is listed in the QAPP and the facility operators are only calibrating the effluent flow after they observe discrepancies between the influent and effluent readings on site. Effluent flow calibration was explained to have been planned to be performed once weekly in the previous record of resolution (Appendix B).
Inspection – Effluent - Narrative Limits	
Discharge of floating, suspended, or submerged matter of any kind to receiving water is present?	☐No ☐PEV 1.2.2 ☒AOC
Inspection of receiving water where effluent enters occurs at frequency identified in IPDES permit and includes updating the written log with photos, date, time, observer and whether there is presence of floating, suspended, or submerged matter?	☐Yes ☐PEV 1.2.2 ☒N/A
Written log of observances is retained on-site and made available to DEQ upon request?	☐Yes ☐PEV 4.2.10 ☒N/A

Narrative notes:	The effluent channel at the facility is comprised of two channels that combine. One channel emanates from the current chlorine contact basin, the other channel is currently unused but emanates from the old chlorine contact basin. Upon inspection, the unused channel that leads to the main effluent channel contained debris (Photograph 10). The operators explained that the bypasses that occur travel from that historic chlorine contact basin to the effluent through that channel.

Inspection – Effluent - Receiving Water Monitoring	
Is permittee required to perform receiving water monitoring?	☒Yes ☐No
Receiving water monitoring sites are as specified in permit?	☒Yes ☐PEV 2.1.4 ☐AOC
Are receiving water & effluent samples taken and analyzed in full accordance with their IPDES permit?	☒Yes ☐PEV 2.1.4 ☐AOC
Receiving water sample results reported on DMR as specified in the IPDES permit?	☒Yes ☐PEV 2.1.4 ☐AOC ☐N/E
Receiving water and effluent samples taken on the same day?	☒Yes ☐PEV 2.1.4 ☐AOC
Are samples for metals, pH, ammonia, temperature, dissolved organic carbon, conductivity and hardness collected on the same day as required?	☒Yes ☐PEV 2.1.4 ☐AOC
Flow rate measurement and receiving water samples are taken as close together as practicable?	☒Yes ☐PEV 2.1.4 ☐AOC
Receiving water monitoring procedures outlined in QAPP are being followed for all ambient sampling including temperature?	☒Yes ☐PEV 4.1.1 ☐AOC
If continuous temperature monitoring is required, does permittee's protocol follow the DEQ protocol document identified in receiving water monitoring section of the IPDES Permit?	☒Yes ☐PEV 2.1.4 ☐AOC ☐N/A
Receiving Water Monitoring notes:	Receiving water monitoring for 2024 included a reference to the incorrect year and did not have detection limits listed in the permit. Facility representatives resubmitted the 2024 Annual Report on April 3, 2025.

Post Inspection - General	
Date and time inspection ended:	March 19, 2025 at 3:32 p.m.
List any informational handouts provided to the permit:	None
Is any follow-up action necessary? Document expectations:	On March 25, 2025 Chantilly Higbee and I emailed the operators the following tasks that needed completion as discussed during the inspection: 1. Update E-Permitting Users (confirmed completed by DEQ on April 3, 2025) 2. Send the Inflow and Infiltration tasks that the City has been working through with the help of a contracted company 3. Reach out to the lab regarding PCB blanks (included in AOC #2 in Summary section) 4. Send the proof of upset, as outlined in Chantilly's Notice of Deficiency, to claim upset status of the facility during the last noncompliance event (submitted April 3, 2025) 5. Resubmit the 2024 Surface Water Monitoring Report with the correct year and detection limits as defined by the permit (submitted April 3, 2025) Outstanding tasks outside of the inspection report for DEQ were as follows: 1. Research interim limits and the compliance schedule outlined in the permit – letting the operators know if they needed to complete more tasks (highlighted in this inspection report) 2. Review WET Testing Results (results outlined in this inspection report) 3. Determine when DEQ would like facility operators to report instances of noncompliance (outlined in this inspection report)

	4. Researching the applicability of diverting groundwater to the middle of waste treatment (outlined in this inspection report)
Describe any compliance assistance delivered:	During the inspection, we discussed options for voluntary enforcement in the case that the facility is not able to comply with limits during times of upgrades. We also discussed setting up a meeting with the DEQ permit writing team to review future limits as the operators are trying to plan for future treatment under an expired permit. Additionally, the operators stated that they have been given inconsistent directions for how often noncompliance should be reported. 24-Hour Reports and other noncompliance notifications outlined in the permit should be followed without exception. The permittee may elect to make more notifications than is outlined in the permit, but at minimum, all permit requirements should be followed. See the Recommendation in the Summary Section for determining if a Noncompliance Report is required.

Have there been any significant changes or additions to the facility since the previous inspection which DEQ was not properly notified?	☒No ☐PEV 4.2.15 ☐AOC
All reports, applications, and any other document submitted to DEQ are signed and certified by a ranking official or a DAR?	☒Yes ☐PEV 4.2.11
Operator licensed or certified appropriately regarding facility class type?	☒Yes ☐PEV 4.1.1 ☐AOC
If documents were requested for submittal, were those submitted within the timeframe required?	☒Yes ☐PEV 4.2.8 ☐N/A
Post Inspection Notes:	Facility operators stopped using the phosphorus removal system without official notification to DEQ, however, this change did not increase or significantly change pollutants that were discharged.

Post Inspection - Procedural Implementation	
Spill Control Plan measures appear to be implemented?	☐Yes ☐PEV 3.0 ☒N/A
Operations and Maintenance procedures appear to be implemented?	☐Yes ☒PEV 4.2.5 ☐AOC
Best Management Practices appear to be implemented throughout facility without issues?	☐Yes ☐PEV 3.0 ☒N/A
QAPP appears to be implemented fully as written?	☒Yes ☐PEV 4.1.1 ☐AOC
Were any chemical storage or containment issues identified?	☐No ☐PEV 4.2.5 ☒AOC
Describe chemical issues. i.e., open containers, exterior containers not covered, secondary containment, dikes/berms in disrepair, etc.:	One pump inside the breezeway building was leaking oil (Photograph 11). Multiple containers were on site without secondary containment (Photograph 12). One underground pipe was leaking during the inspection between the primary clarifiers and the headworks building. The operators explained that much of the pipe around the facility is in need of replacement (Photograph 13)

Mercury Minimization Plan implemented as required?	☒Yes ☐PEV 3.0 ☐N/A
Has permittee failed to submit permit renewal application at least 240 days in advance or a full application including monitoring results?	☒No ☐PEV 2.3 ☐AOC ☐N/A
Permit waiver conditions have issues?	☐No ☐PEV 3 ☐AOC ☒N/A
Emergency Response Plan Notification is being implemented as required?	☒Yes ☐PEV 4.1.3 ☐AOC ☐N/A
Methylmercury Plan implemented as required?	☒Yes ☐PEV 3.0 ☐N/A ☐N/E
Individual Fish Tissue Monitoring Plan implemented as required?	☒Yes ☐PEV 3.0 ☐N/A ☐N/E
Phosphorus Management Plan implemented as required?	☐Yes ☐PEV 3.0 ☒N/A ☐N/E

Are there any issues with intake credits requirements?	☐No ☐PEV 3.0 ☒N/A ☐N/E
Has permittee received discharge from IU of newly introduced toxic pollutants, flow or characteristics and failed to report as required in the Permit?	☒No ☐PEV 2.2.5 ☐N/A ☐N/E
Post Inspection notes:	

Post Inspection - Emergency Standby Equipment

Does the facility have emergency backup equipment or auxiliary systems in place and being maintained to achieve compliance with the Permit if needed?	☐Yes ☒PEV 4.2.5 ☐AOC
Describe any issues with backup equipment. i.e., SCADA, maintenance, inadequate generators, alarms, other.	An upset from SCADA occurred on February 20, 2025, when pumps to the breezeway unexpectedly turned off and caused wastewater to back up and bypass to the effluent without treatment (EDMS 2025FAP569). Compliance for this instance was assigned separately, in conjunction with , the Notice of Deficiency sent to the facility on March 7, 2025 (EDMS 2025FAP593).
Specify Other:	None
If a variance was requested, was it submitted complete and as required?	☐Yes ☐PEV 3.0 ☒N/A
The Duty to Comply requirements were met as required?	☒Yes ☐PEV 4.2.1 ☐N/A ☐N/E
Permittee's Duty to Mitigate discharge failed and significantly affected human health or the environment?	☒No ☐PEV4.2.4 ☐N/A
Emergency Equipment notes:	Two different backup generators are utilized at the wastewater treatment plant (natural gas and diesel). Each generator runs half the plant for emergency operations. During emergency operations, only equipment and buildings that are needed for treatment are powered. Redundancy exists in the following areas: Headworks, solids handling, breezeway lift station (4 pumps), primary clarifiers, aeration basin (multiple blowers). The anaerobic digester does have redundancy available, but it is not operational as it is not installed.

Summary

Violations

The following violations were identified:

1. Emergency Response Plan Not Current

   Part II.E.b of the permit states the Emergency Response Plan must include mechanisms to: *"Ensure appropriate responses including assurance that reports of an overflow or of an unanticipated bypass or upset that exceed any effluent limitation in the permit are immediately dispatched to appropriate personnel for investigation and response…"*

   It is a violation of the permit that the Emergency Response plan is not up to date with respect to the current personnel responsible for implementing portions of the Plan.

2. DMR Reported Values Incorrect

   Part III.B of the permit states: *"The permittee must submit monitoring data and other reports electronically using NetDMR"*

   It is a violation of the permit that the monitoring results for Cyanide, weak acid dissociable has been incorrectly transcribed from the laboratory results provided by the contract laboratory for the following monitoring periods:

   - **May 2023**
   - **November 2023**
   - **November 2024**

   It is a violation of the permit that the facility is reporting PCB results as "NODI Code 9 – Monitoring Not Required" but attaching the results that were taken to the DMR.

3. Analytical Methods not Sufficiently Sensitive

   Part I.B.6.a-b of the permit states: *"Parameters with an effluent limit. The method must achieve a minimum level (ML) less than the effluent limitation unless otherwise specified in Table I Effluent Limitations and Monitoring Requirements….(ii) The permittee must use a method that can achieve a maximum ML less than or equal to those specified in Appendix A. Minimum Levels."*

   It is a violation of the permit that the monitoring for Arsenic and Lead have not been conducted with sufficiently sensitive methods to achieve the minimum level listed in Appendix A of the Permit.

4. WET Testing Report Missing Elements

   Part I.C.4.b of the permit states: *"…In addition to toxicity test results, the permittee must report: dates of sample collection and initiation of each test; flow rate at the time of sample collection; and the results of the monitoring required in Part I.B of this permit, for parameters with a required monitoring frequency of once per quarter or more frequently."*

   It is a violation of the permit that the monitoring results for the following parameters are not included in the WET Test Reports:

- **Flow**
- **BOD5**
- **TSS**
- **pH**
- **E. coli**
- **Total Residual Chlorine**
- **Mercury, total**
- **Phosphorus, Total as P**
- **Ammonia, Total as N**
- **Nitrate + Nitrite**
- **Total Kjeldahl Nitrogen**
- **Soluble Reactive Phosphorus**
- **Conductivity**
- **Dissolved Organic Carbon**
- **Hardness, total**

5. Improper Operation and Maintenance

Part IV.E of the permit states: *"The permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of the permit."*

It is a violation of the permit that the following portions of the treatment processes are being maintained appropriately:

- **Headworks building (mold)**
- **Skimming tank vault (aggregate on walls is degraded)**
- **Underground pipes (leaking and degraded)**
- **Breezeway pumps (leaking oil)**
- **Chlorination basin (solids floating)**
- **Belt press (degraded and temporary repairs implemented)**

- **Effluent channel upstream of chlorination basin (contains debris and organic buildup)**

It is a violation of the permit that the facility cannot meet effluent limits during times of wet weather and high flow to the facility as flows are exceeding the capacity of the following treatment processes:

- **Aeration basin (causing increased turbidity)**
- **Breezeway pumps (causing a bypass of untreated wastewater to the effluent)**

6. Inflow of Groundwater to Treatment Processes

Part II.D.2.c.ii of the permit states the facility plan must include: *"Reduction or elimination of excessive infiltration and inflow of uncontaminated ground and surface water into the sewer system"*

It is a violation of the permit that the facility is diverting groundwater into the aeration basin.

It is a violation of the permit the facility is receiving excessive flow from wet weather events which is causing noncompliance with permit effluent limits.

Areas of Concern

The following AOCs were identified:

1. Compliance Schedule Missing Documentation

Part II.F.6.c of the permit states: *"By November 30, 2021, final plans and specifications for the modifications proposed in the PER shall be submitted to DEQ for approval."*

It is an area of concern that the final plans and specifications were not submitted to DEQ for the Chemical Feed Pilot Project outlined in Option #1 of the Compliance Schedule.

2. Quality Assurance and Quality Control Samples Inconsistent

Part II.C.3.a of the permit states the QAP must include: *"Details on the number of samples, type of sample containers, preservation of samples, holding times, analytical methods, analytical detection and quantitation limits for each target compound, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements.*

It is an area of concern that the QAP does not include complete information for the quality assurance field samples taken for each laboratory parameter.

It is an area of concern that the quality assurance blank corrections are not being included with PCB test results.

3. Flow Calibration Inconsistent

The Facility's O&M Manual states the following: *"...The flume is checked for calibration whenever an issue is suspected. Comparing influent totals to effluent totals provides an indication that something is wrong if the totals are not close."*

The Record of Resolution submitted to DEQ on July 31, 2019, following the previous inspection stated: "Checks of the measured flow versus the staff guage reading will be conducted and recorded weekly"

It is an area of concern that the QAP does not include the calibration methods and the practices outlined in the last record of resolution and the current O&M manual are conflicting.

4. Submerged Matter Upstream of Effluent Discharge Channel

   Part I.B.3 of the Permit states: *"The permittee must not discharge floating, suspended, or submerged matter of any kind in amounts causing nuisance or objectionable conditions or that may impair designated beneficial uses of the receiving water"*

   It is an area of concern that there was submerged matter upstream of the effluent discharge channel.

5. Control of Undesirable Pollutants

   Part II.A.6 of the Permit lists pollutants that should not be introduced to the facility.

   It is an area of concern that there was oil containers stored in buildings over wastewater that were not placed in secondary containment.

Recommendation

DEQ recommends that operators and representatives review the Permit Section III.G for noncompliance reporting. DEQ will not ask the permittee to do less reporting than is outlined in the Permit. Facility Representatives are able to complete a 24-Hour Report when in doubt or when questioning whether a 24-Hour report is required.

Prepared By:

Date: April 10, 2025

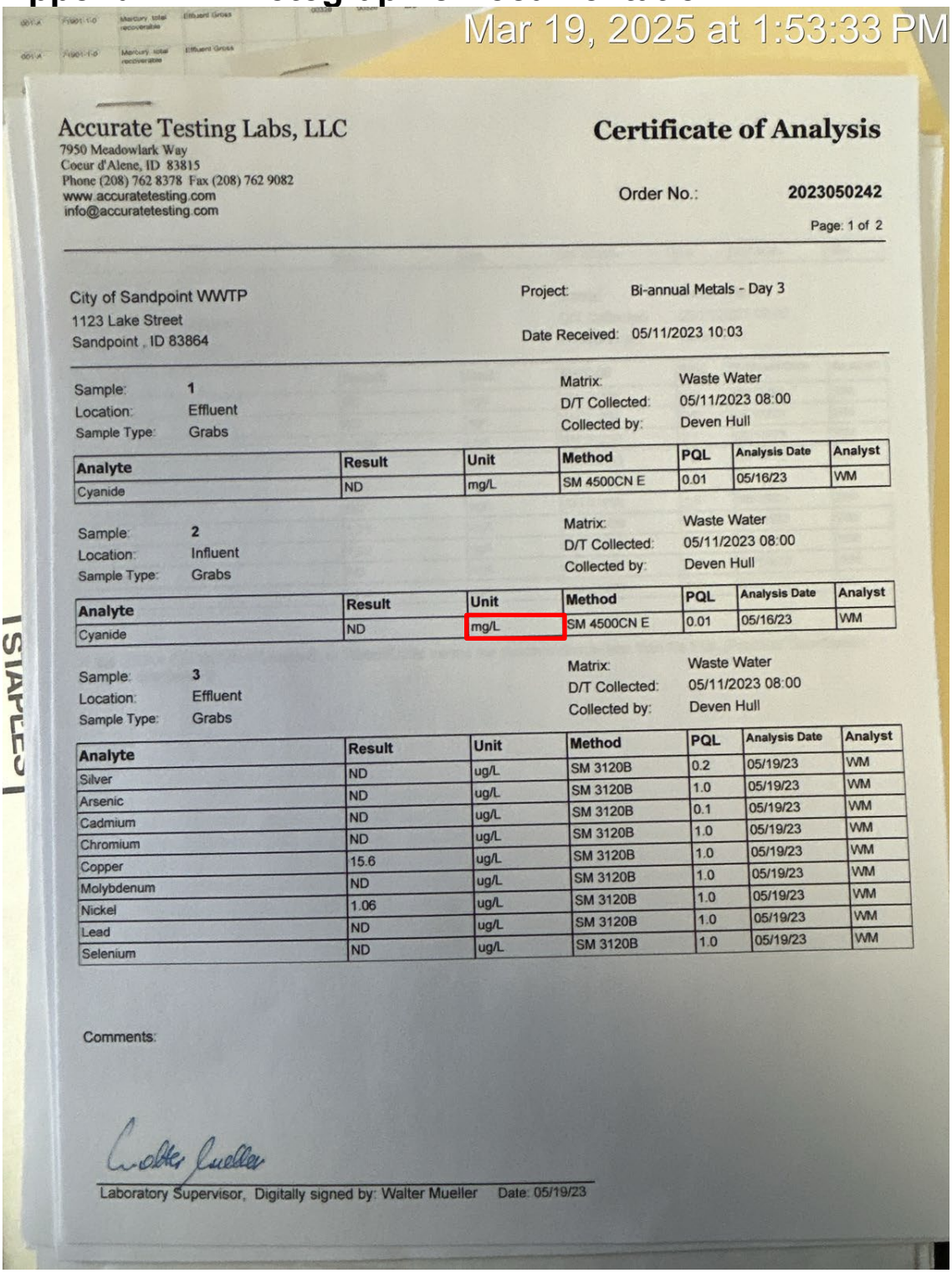
Brandi Lowe
IPDES Compliance Officer
Department of Environmental Quality

Reviewed By:

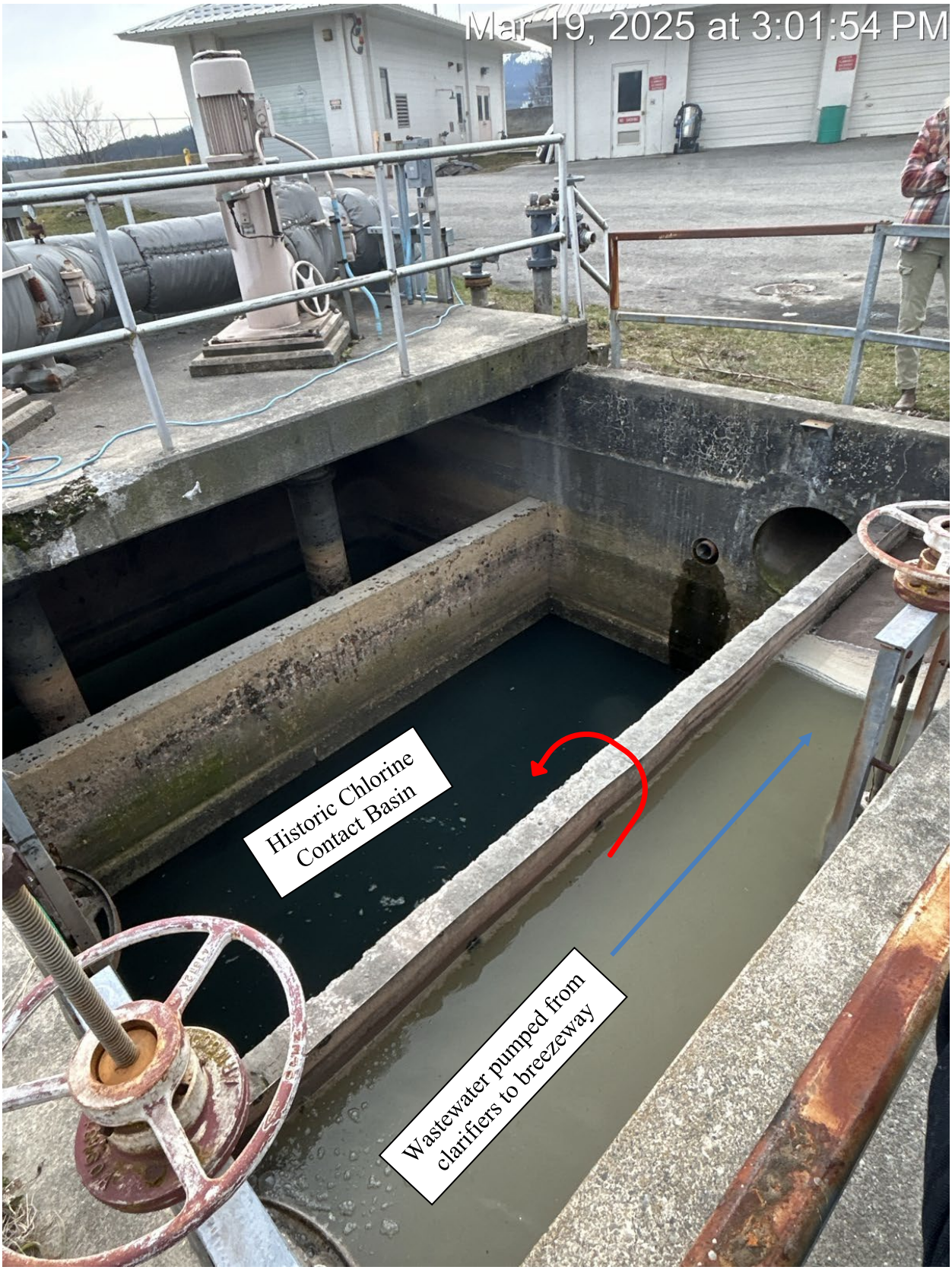
Date: April 11, 2025

Jayson Foley
IPDES Wastewater Enforcement Coordinator
Department of Environmental Quality

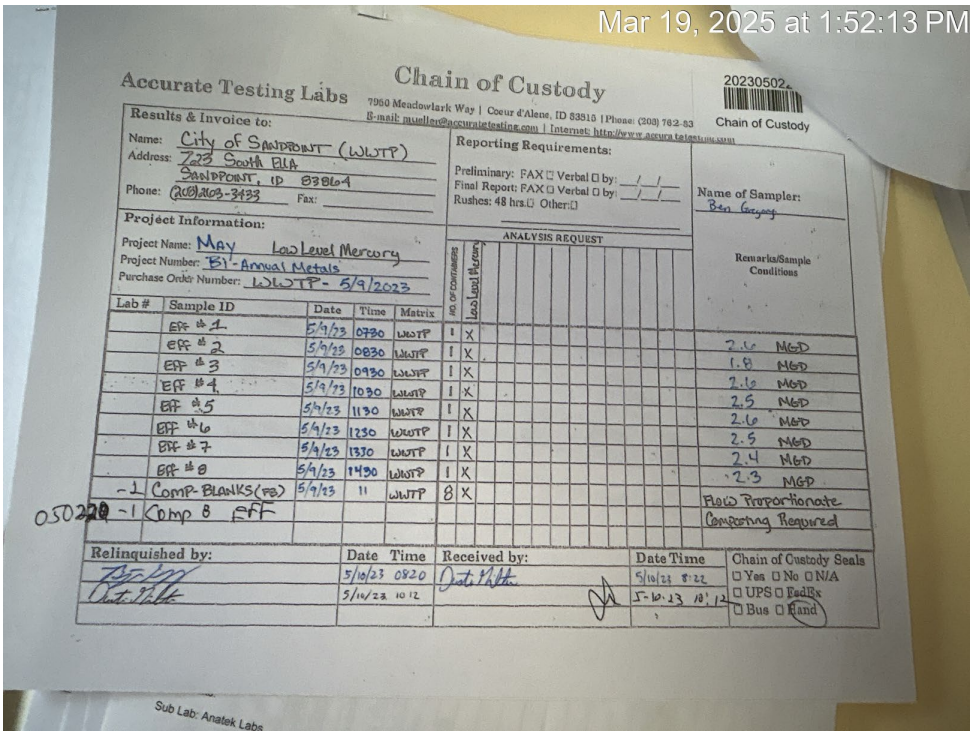
Appendix A. Photographic Documentation



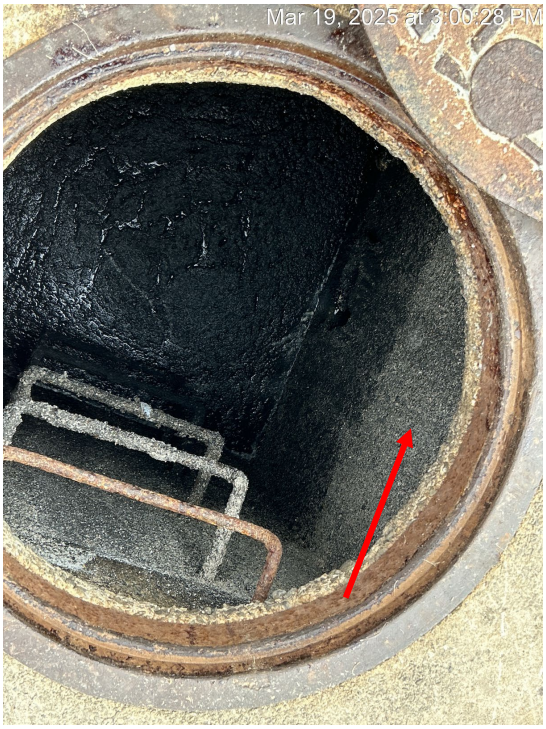
Photograph 1. Laboratory analytical results for biannual metals, units of cyanide indicated by a red box.



Photograph 2. Flow to breezeway pumps and historic chlorination ditch, normal flow indicated by blue arrow, bypass flow indicated by red arrow, facing southwest.



Photograph 3. Chain of Custody example for biannual metals.

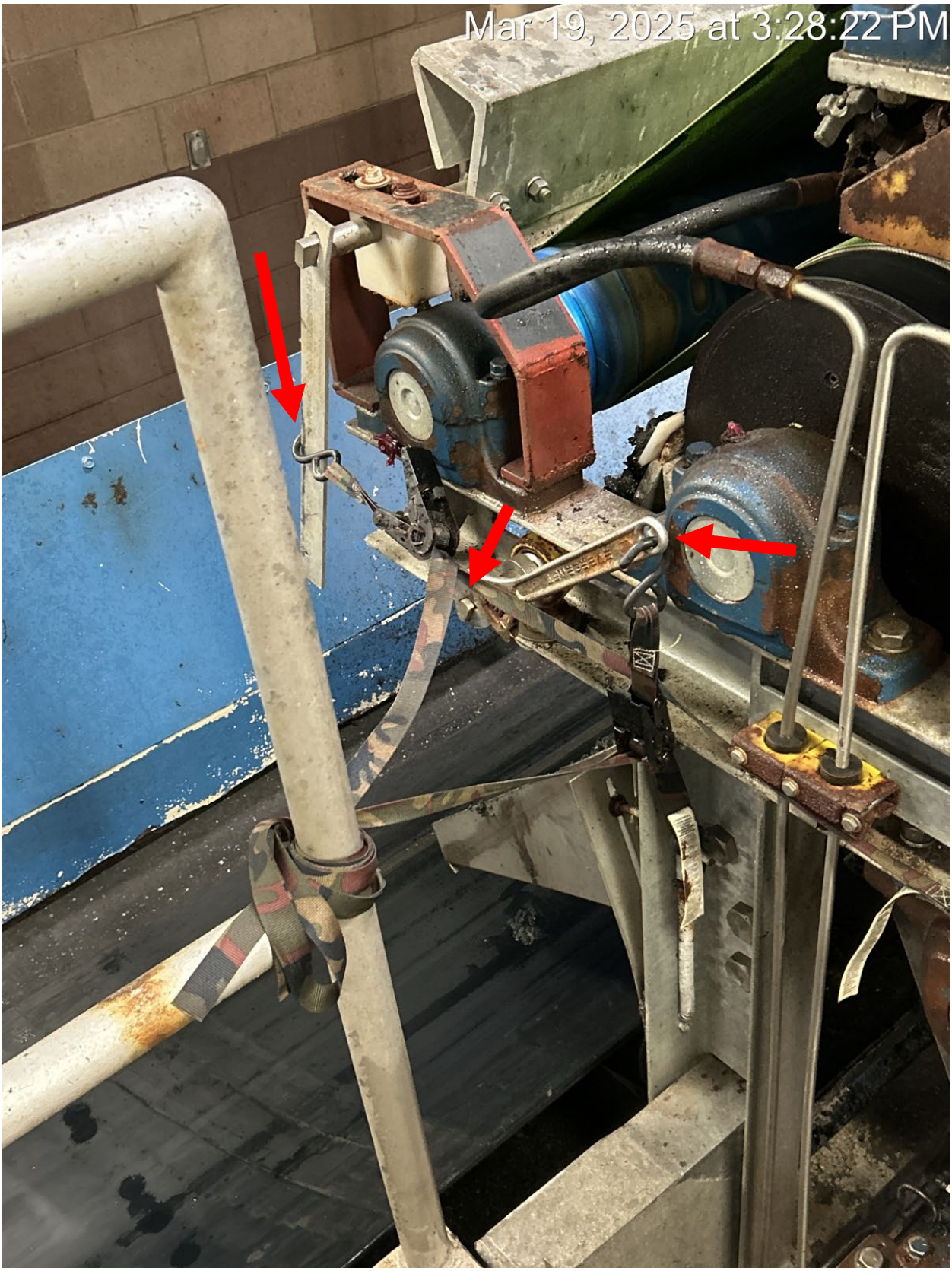


Photograph 4. Skimming tank vault for solids collection from the primary clarifiers, degraded aggregate indicated by red arrow.

Photograph 5. Aeration basin overview with groundwater pipe discharging to the basin indicated with red arrow, facing southwest.

Photograph 6. Chlorination contact chambers, red arrows indicating floating solids, facing east.

Photograph 7. Chlorination contact chambers, red box indicating floating solids facing southeast.



Photograph 8. Implemented measures to keep belt press one of two operational, wrench and tie down connection points indicated by red arrows.

Photograph 9. Belt press overview, deteriorated portion outlined by a red box.

Photograph 10. Upstream of chlorine contact chamber effluent to receiving waters, algae and debris indicated by red circles, facing southeast.

Photograph 11. Breezeway pumping building, oil bordering northern pump indicated by a red circle.

Photograph 12. Breezeway pumping building, northern pump leaking oil, containers without secondary containment indicated by red arrows.

Photograph 13. Pipe leak between headworks and primary clarifiers indicated by a red circle, facing northeast.

Appendix B. Facility Documentation

The table below identifies the key personnel who will be responding in emergency situations.

Responsibilities Chart

Name and title	**Responsibilities during a SSO response**	***Contact numbers***
Jennifer Stapleton City Administrator	Responsible for release of information to the public and media.	Phone: 208-265-1483
Amanda Wilson Public Works Director	Responsible for overall management of the sewer collection system. Takes the lead for managing the response to an SSO.	Phone and Cell: 208-263-3411
Jeff Cowley Water and Wastewater Superintendent	Responsible Charge Operator for collection and treatment systems. Lead for providing information to regulatory agencies. Responsible for determining the need to contact Fire department (for response to toxic spills and containment booms, eg),	Phone: 208-263-3471 Cell: 970-396-1632
Deven Hull Wastewater Plant Supervisor	In charge of operating the wastewater treatment plant. First contact for wastewater treatment plant emergency situations. Responsible Charge Operator for the WWTP.	Phone: 208-263-3433 Cell: 208-597-1992
Rod Berget Utilities Supervisor	In charge of operating the collection system, performing inspections, maintenance and relaying critical information, assessing facilities, and providing recommendations to the Water and Wastewater Superintendent and Public Works Director. Responsible for organizing crews for response.	Phone: 208-263-1487 Cell: 208-290-1438
Collection System On-Call Operator	First response to SSO event and initial analysis of situation.	Phone: 1-800-482-4804 After hours emergency contact number.
Treatment Plant On-Call Operator	First response to alarm call out from WWTP.	

Photograph 14. Emergency Response Plan Responsibilities Chart, outdated information indicated by a red box.

SANDPOINT

Wes Green
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

July 31, 2019

Mr. Green,

This letter is to inform you that the effluent flow meter was calibrated by Field Instruments and Controls on 7/22/19. The sheet detailing the calibration is included. Checks of the measured flow versus the staff gauge reading will be conducted and recorded weekly.

Sincerely,

Jeff Cowley
Water and Wastewater Superintendent

1123 Lake Street, Sandpoint, ID 83864 · 208-263-3158 · www.Sandpointidaho.gov

Photograph 15. Previous Record of Resolution indicating flow calibration frequency.