



May 19, 2025

Brandi Lowe
IPDES Compliance Officer
DEQ Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

Re: Record of Resolution - Compliance Evaluation Inspection – Violations and Areas of Concern - for Sandpoint WWTP, Idaho Pollutant Discharge Elimination System Permit ID0020842

Dear Ms. Lowe,

The purpose of this letter is to provide a Record of Resolution in response to the violations and areas of concern identified during the March 19, 2025, Idaho Department of Environmental Quality (DEQ) compliance inspection and collection system survey of the Sandpoint Wastewater Treatment Plant. The City takes these findings seriously and is committed to addressing them.

Sandpoint is actively planning for the long-term replacement of its wastewater treatment plant and is working with Keller Associates to complete a Preliminary Engineering Report (PER). The City is also pursuing multiple funding sources to support the design and construction of a new facility that meets regulatory and operational needs.

A major contributor to past violations is seasonal inflow and infiltration (I/I), particularly during rain-on-snow events in the winter months. These conditions raise groundwater levels and lead to excessive flow into the collection system. In response, the City budgets annually for I/I mitigation and has made steady progress. Over 25% of sewer mains have been rehabilitated using cured-in-place pipe (CIPP) and in a pilot program, 100 private laterals have repaired. In addition, the City implements a Sewer Later Inspection Program (SLIP) which has led to repair or replacement of over 300 sewer laterals. To support transparency and ongoing coordination with DEQ, the City will submit a series of technical memoranda outlining completed and planned I/I reduction projects.

The following summarizes specific responses to each violation and area of concern identified in the inspection.

Violations:

1. Emergency Response Plan Not Current:

Violation: 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.

Resolution: ERP will be revised to identify responsible positions instead of individual names to ensure it remains current with staffing changes.

2. DMR Reported Values Incorrect:

Violation: 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

Resolution: City is working with ATL Laboratory to ensure accurate reporting of the lower limits for Cyanide and to correct the errors reported.

Violation: 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.

Resolution: Brandi Lowe with DEQ is investigating why there are multiple DMR submissions for PCB’s when monitoring for PCBs is required twice per year. This should resolve issue of Sandpoint entering NODI code for the DMR when no monitoring is required.

3. Analytical Methods not Sufficiently Sensitive:

Violation: 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.

Resolution: The City requests direction from DEQ on this item. Arsenic has been corrected to a MDL of 0.5ug/l. Lead, however, has a MDL in the permit of 0.16ug/l which is a limit our labs are unable to meet at this time.

4. WET Testing Report Missing Elements:

Violation: 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

Resolution: Going forward, all required parameters will be submitted via e-permitting with the WET reports. All tests have been conducted but were not always attached. See tables below:

WET TEST 2023			
	6/12/2023	6/13/2023	6/14/2023
Flow	1.5MGD	1.6MGD	1.6MGD
BOD	15.68mg/l	16.65mg/l	19.89mg/l
TSS	6mg/l	6mg/l	4mg/l
pH	7.1su	7.2su	7.2su
E.coli	1011.2/100ml	101.2/110ml	135.4/100ml
Chlorine	0.01mg/l	0.01mg/l	0.01mg/l
mercury	0.00120ug/l	0.00132ug/l	0.00116ug/l
Phosphorus	1410ug/l	1820ug/l	1980ug/l
Ammonia	4.49mg/l	7.97mg/l	7.70mg/l
Nitrate+Nitrite	3.897mg/l	3.438mg/l	2.258mg/l
TKN	5.3mg/l	9mg/l	9.06mg/l
O-Phosphorus	1.20mg/l	1.68mg/l	1.87mg/l
Conductivity	558umhos/cm	613umhos/cm	660umhos/cm
DOC	6.86mg/l	7.35mg/l	7.69mg/l
Hardness	182.8CaCO3	165.6CaCO3	168.4CaCO3

WET TEST			
	7/22/2024	7/23/2024	7/24/2024
Flow	1.2MGD	1.2MGD	1.3MGD
BOD	14.92mg/l	18.30mg/l	19.05mg/l
TSS	0mg/l	2mg/l	4mg/l
pH	7.17su	7.34su	7.34su
E.coli	2/100ml	1/110ml	3.1/100ml
Chlorine	0.01mg/l	0.03mg/l	0.03mg/l
mercury	0.000949ug/l	0.00140ug/l	0.00129ug/l
Phosphorus	1130ug/l	2620ug/l	4300ug/l
Ammonia	24.72mg/l	27.01mg/l	28.53mg/l
Nitrate+Nitrite	1mg/l	0.93mg/l	0.787mg/l
TKN	21.7mg/l	23.6mg/l	30mg/l
O-Phosphorus	1.05mg/l	2.37mg/l	3.96mg/l
Conductivity	679umhos/cm	738umhos/cm	777umhos/cm
DOC	9.07mg/l	9.62mg/l	10.2mg/l
Hardness	139.2CaCO3	140.8CaCO3	136CaCO3

5. Improper Operation and Maintenance:

Violation: 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)

Resolution:

- On March 14, 2025, the City contracted with North Idaho Flood and Dire to remediate mold at the Headworks Building, which took place on March 31, 2025. The City is also working on heating and ventilation improvements to the building to prevent this issue in the future.
- The City contracted with Keller Associates to develop a Preliminary Engineering Report to reconstruct the waste water treatment plant with the intention rehabilitating or replacing all structures, including the skimming tank vault, that

are degraded.

- The City's Utility Crew is actively investigating the location of the leaking underground pipe. Scheduled for repair by City Utility Crew.
- City confirmed that the Breezeway pumps are not leaking. It appears that routine maintenance work by operators were misinterpreted by DEQ during the inspection. The maintenance work is complete, oil has been properly stored, and cleanup completed.
- The Chlorination Basin has been cleaned, and typically it is checked throughout the day once in the morning and once in the afternoon.
- The City is actively working on a project to remove the existing belt press units and replace them with screw presses. We are currently working with Stantec Consulting to develop a Preliminary Engineering Report and initiate procurement for the replacement later this year.
- Project is underway and the City is actively seeking a contractor to install a new gate to prevent stagnant water and organic buildup.
- The City contracted with Keller Associates to develop a Preliminary Engineering Report to reconstruct the wastewater treatment plant with the intention of correcting the high flow violations and prevent bypass and turbidity.

6. Inflow of Groundwater to Treatment Processes:

Violation: 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.

Resolution: This City is working with Brandi Lowe with DEQ for a solution to the groundwater into aeration basin, the water is from the condensate off the methane line and most likely cannot be discharged to storm or groundwater. Long-term resolution will be incorporated into plant upgrades, which is in the process of Preliminary Engineering Report development by the City's consultant, Keller Associates.

Areas of concern:

1. Compliance Schedule Missing Documentation: 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.

Resolution: Records located on e-permitting (entered by Jeff Cowley) will be formally referenced and attached to this response.

2. Quality Assurance and Quality Control Samples Inconsistent: 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.

Resolution: The city will update the QAP to include the quality assurance field sample information. I will reach out to the lab for the corrections on the PCB test results.

3. Flow Calibration Inconsistent: 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.

Resolution: The City will correct the QAP to match the O&M manual.

4. Submerged Matter Upstream of Effluent Discharge Channel: It is an area of concern that there was submerged matter upstream of the effluent discharge channel.

Resolution: The City is working with engineers to find a contractor to gate this section off from stagnant water to prevent this problem in the future.

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

Resolution: Oil has been properly stored and cleanup completed, pictured below:



Please don't hesitate to reach out if you have any questions or need additional information regarding the corrective actions outlined in this report.

Sincerely,

Deven Hull
WWTP Supervisor

Enclosure(s):