

2110 Ironwood Parkway
Coeur d'Alene, ID 83814 • (208) 769-
1422



Brad Little, Governor
Jess Byrne, Director

April 17, 2025

Devin Hull, Wastewater Treatment Plant Supervisor
Sandpoint, City of – Sandpoint WWTP
1123 Lake Street
Sandpoint, ID 83864
dhull@sandpointidaho.gov

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

Dear Mr. Hull:

On March 19, 2025, the Idaho Department of Environmental Quality (DEQ) conducted a compliance evaluation inspection and collection system survey of the Sandpoint WWTP. The purpose of this inspection was to determine compliance with the Idaho Pollutant Discharge Elimination System (IPDES) Permit ID0020842 and the "Rules Regulating the Idaho Pollutant Discharge Elimination System Program" (IDAPA 58.01.25). DEQ appreciates the assistance you and Ms. Ellis provided during the inspection. A copy of the 2025 Compliance Evaluation Inspection Report and Collection System Survey is attached. Please note that corrective action is necessary to comply with regulatory requirements.

At the time of the inspection, 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.

At the time of the inspection, the following areas of concern 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 gauge 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.

At the time of the inspection, the outstanding deficiency for missing information in the chain of custody identified during the 2019 Compliance Evaluation Inspection was reviewed. During the 2025 Compliance Evaluation Inspection recent chain of custodies were consistent with requirements outlined in the Permit. There is no follow-up action required from the permittee regarding chain of custody concerns.

DEQ is providing this notice so you may correct the active violations and areas of concern with the facility. **At this time, you must take the following actions by May 19, 2025:**

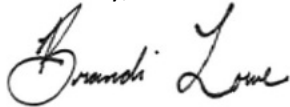
1. Provide a Record of Resolution, a document containing the violations and areas of concern, the action taken to address each violation and area of concern, the date of the resolution, and the person resolving it.
2. Submit the Record of Resolution and any changes made to plans on site to address the above

violations and areas of concern to DEQ via the IPDES E-Permitting System

Thank you for your help with the inspection process. DEQ encourages you to continue your compliance efforts. Responsibility for compliance with the IPDES Permit rests with the permittee.

If you have any questions about the inspection, I may be reached at (208) 737-3862 or brandi.lowe@deq.idaho.gov.

Sincerely,

A handwritten signature in black ink that reads "Brandi Lowe". The signature is written in a cursive, flowing style.

Brandi Lowe
IPDES Compliance Officer

Attachment: Compliance Evaluation Inspection - Inspection Report

c: Heidi Caye, Wastewater Compliance and Enforcement Supervisor, DEQ State Office
Jayson Foley, Wastewater Enforcement Coordinator, DEQ State Office
Sean Woodhead, Regional Surface Water Manager, DEQ Twin Falls Regional Office
Katy Baker-Casile, Regional Engineering Manager, DEQ Coeur d'Alene Regional Office
Chantilly Higbee, IPDES Compliance Officer, DEQ Coeur d'Alene Regional Office
Carolyn Whitney, IPDES Compliance Officer, DEQ Boise Regional Office
Holly Ellis, Sandpoint WWTP