AGENDA REPORT
City Council Meeting

TODAY'S DATE: May 15, 2025

MEETING DATE: May 21, 2025

TO: MAYOR AND CITY COUNCIL

FROM: Holly Ellis, Public Works Director

SUBJECT: Update on Wastewater Treatment Plant Compliance

DESCRIPTION/BACKGROUND:

On March 19, 2025, the Idaho Department of Environmental Quality (DEQ) conducted a routine compliance evaluation inspection of the Sandpoint Wastewater Treatment Plant (WWTP), which included a review of operations, monitoring, reporting practices, and the condition of infrastructure. The inspection was part of DEQ's oversight responsibilities under the City's Idaho Pollutant Discharge Elimination System (IPDES) Permit ID0020842. The resulting inspection report, issued on April 17, 2025, identified six permit violations and five additional areas of concern requiring corrective action.

The violations include an outdated Emergency Response Plan, incorrect transcription of monitoring data in Discharge Monitoring Reports (DMRs), use of analytical methods not sensitive enough to meet permit requirements, missing data in Whole Effluent Toxicity (WET) test reports, multiple operation and maintenance deficiencies, and the introduction of groundwater into the aeration basin. DEQ also flagged areas of concern including incomplete compliance schedule documentation, inconsistencies in quality assurance procedures, lack of proper calibration documentation for flow monitoring, and improper chemical storage practices. A Record of Resolution is required to be submitted by May 19, 2025, detailing the corrective actions taken to address each issue.

The inspection followed a separate regulatory issue related to a system upset that occurred on February 24, 2025. During this incident, a SCADA system error caused a failure in the breezeway pumps, resulting in a discharge of approximately 300 to 500 gallons of partially treated wastewater to the Pend Oreille River. The City reported the event in accordance with permit requirements and submitted a 5-day follow-up report. On March 7, 2025, DEQ issued a Notice of Deficiency and required additional documentation to demonstrate the event qualified as an "upset" under the permit. The City responded on April 3, 2025, and DEQ issued a Compliance Determination Letter on April 28, 2025, confirming the City had returned to compliance with respect to the February 24 incident.

The inspection and recent upset underscore several longstanding challenges at the WWTP, including aging infrastructure and limited capacity to manage wet weather flows. These issues contribute to routine permit exceedances and operational vulnerabilities, particularly during storm events. While the City has been proactive in addressing inflow and infiltration through lateral replacement, collection system rehabilitation, and public education, the facility is still strained during peak flow conditions. Several treatment components, including the belt press in the headworks building, require major rehabilitation. The City has also begun planning for a complete facility upgrade, which remains critical to long-term compliance and operational reliability.

In the short term, Public Works staff are addressing the identified deficiencies through updated procedures, documentation, and minor repairs where possible. However, many of the issues will require capital investment and coordination with DEQ to ensure the plant can continue to meet its permit requirements. Failure to correct the issues could result in further enforcement actions or penalties. The department will continue to work with DEQ and keep Council informed of corrective actions, permitting updates, and infrastructure planning needs.

STAFF RECOMMENDATION: N/A

ACTION: N/A

WILL THERE BE ANY FINANCIAL IMPACT? N/A   HAS THIS ITEM BEEN BUDGETED? N/A

ATTACHMENTS:
1. **Notice of Deficiency from February 24 Upset**
2. **Compliance Determination Letter from February 24 Upset**
3. **Compliance Evaluation Cover Letter from March 19 Inspection**
4. **Compliance Evaluation from Match 19 Inspection**
5. **Record of Resolution to be Submitted to DEQ**