

U.S. EPA Region 8 NPDES Inspection Report – WWTF

National Database Information	
Inspection Date: August 11, 2022	Inspection Type: Reconnaissance Inspection
Entry / Exit Time: 12:00 PM / 12:45 PM	NPDES ID Number: MTU000717
Major / Non-Major Facility: Non-Major	Program Sector(s): WWTF (Privately-Owned)
NAICS Code: 221320 (Sewage Treatment Facilities)	Inspection ID: 202208_MTU000717
Lead inspector and affiliation: Akash Johnson / U.S. EPA Region 8	

Facility Location Information	
Site/Facility Name & Location: 40 Mile Colony WWTF Big Horn County, Montana 59050 Vicinity of 45.276438, -107.34912	Email Report to: (b) (6) 40 Mile Colony (b) (6)

Contact Information	
	Name(s)/Title
Facility Contacts	(b) (6) / 40 Mile Colony (present, lead)
Other Attendees	Jason Schneider / Tribal Utility Consultant / Indian Health Service (present)
Person/Company meeting definition of “Owner”	40 Mile Colony
Person/Company meeting definition of “Operator”	40 Mile Colony
Responsible Official(s)	(b) (6) / 40 Mile Colony (present, lead)

Permit / Facility Information	
Permit on site and available: N/A – unpermitted	Permit Application Date: N/A – unpermitted
Effective Date: N/A – unpermitted	Expiration Date: N/A – unpermitted
Latitude: 45.276438	Longitude: -107.34912
Receiving Water(s): N/A – non-discharging	
Weather Conditions: Sunny, hot	
Inspector’s source of information: Facility representatives, inspection observations, EPA databases	

Areas Evaluated During Inspection		
Permit	Self-Monitoring Program	Pretreatment
Records	Compliance Schedule	Pollution Prevention
<u>Facility Site Review</u>	Laboratory	Stormwater
Effluent/Receiving Waters	<u>Operations and Maintenance</u>	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow

Report Review and Signature	
Drafter Name/Signature/Date	Contact Information
AKASH JOHNSON  Digitally signed by AKASH JOHNSON Date: 2022.09.14 12:16:56 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202 johnson.akash@epa.gov (303) 312-6067
Management Reviewer Name/Signature/Date	Contact Information
Boeglin, Michael  Digitally signed by Boeglin, Michael Date: 2022.09.14 08:22:50 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202 boeglin.michael@epa.gov (303) 312-6250
Michael Boeglin, NPDES and Wetlands Enforcement Section Supervisor	

Inspection Narrative and Facility Description

1.0 Introduction

On Thursday, August 11, 2022, I, U.S. Environmental Protection Agency (EPA) inspector Akash Johnson, conducted an unannounced reconnaissance inspection of the 40 Mile Colony (Colony) wastewater treatment facility (facility), located in Bighorn County, Montana, within the exterior boundaries of the Crow Reservation. I was accompanied by Indian Health Service representative Jason Schneider, Tribal Utility Consultant for the Crow Tribe. Construction of the facility was completed sometime between 2019 and 2021 and, to my knowledge, this was the first EPA inspection of the facility. The purpose of the inspection was to evaluate compliance with applicable Clean Water Act requirements. Throughout the inspection, I took notes on discussions and observations in a field logbook. Photographs taken during the inspection are included in the attached photo log.

2.0 Inspection Narrative and Facility Description

Jason and I arrived at the Colony community center building at approximately 12:00 PM. Upon our arrival, we were greeted by several residents of the Colony. We requested to speak with someone about the facility and were met by Colony representative (b) (6), who introduced himself as someone knowledgeable of the facility. Jason and I introduced ourselves to (b) (6). I explained the EPA's Clean Water Act regulatory authority, stated my intent to conduct an inspection of the facility, described the general scope of an inspection, and presented my inspector credentials to (b) (6). We commenced the inspection opening conference outside the community center building.

(b) (6) explained he had been involved with construction of the facility and performed routine facility operation and maintenance. (b) (6) stated the facility served the community center building and approximately five residences. (b) (6) estimated less than 20 people were routinely served by the facility at the time of the inspection, but the facility had been designed to serve 80-100 people, as the Colony had plans for expansion. (b) (6) indicated all other plumbed structures in the Colony were served by septic systems. (b) (6) indicated a consultant had been involved in facility design and construction.

Based on information provided by (b) (6) and observations made during the inspection, the facility comprised a privately-owned collection system and two-cell facultative lagoon. The collection system included one lift station. All wastewater collected from structures gravity-flowed to the lift station. Wastewater was pumped from the lift station through a force main to the lagoon. The lagoon featured a synthetic liner. (b) (6) stated the lagoon had never discharged.

After the opening conference, we drove to the lift station, located in the northwest portion of the Colony development (Photograph 226). The lift station was configured with dual submerged pumps. We did not observe the interior of the wet well. (b) (6) stated the wet well had never overflowed and the lift station was equipped with a call-out alarm system which communicated with his cell phone. A portable canopy had been installed to provide shade over the lift station control panel. (b) (6) stated the canopy had been installed to prevent the control panel from overheating, as overheating had previously occurred and interfered with lift station controls.

After observing the lift station, we drove to a point overlooking the lagoon from the north (Photograph 227). The lagoon was located between telecommunications antennae and Interstate-90. The area in the vicinity of the lagoon was fenced and devoid of trees. The cells were configured to operate in series, with influent entering Cell 1 and gravity-flowing into Cell 2. Cell 2 was mostly

Inspection Narrative and Facility Description

empty; portions of the liner along the bottom of the cell were exposed to the atmosphere. We did not enter the fenced lagoon area. I did not observe an outfall from Cell 2 and (b) (6) stated he believed no outfall had been installed.

While observing the lagoon, we discussed that, should the lagoon ever fill to capacity, several options were available for preventing or appropriately managing a discharge, including applying for and complying with a National Pollutant Discharge Elimination System (NPDES) permit, land application, or construction of additional cells to increase lagoon retention capacity. We also discussed recommended routine and non-routine facility maintenance, including inspections, mowing of vegetation on and around the lagoon berms, and sludge depth evaluation and removal. Links to information on the NPDES program and recommended facility maintenance are included in the Findings and Recommendations section of this report.

After observing the lagoon, we drove back to the Colony community center where we discussed the general process for developing and issuing inspection reports. The inspection concluded when Jason and I departed the Colony at 12:45 PM.

3.0 Post-Inspection Activities and Conclusion

After the inspection, I performed a cursory review of EPA databases to evaluate whether the EPA maintained any additional information on the facility. I learned an EPA Construction General Permit (CGP), assigned NPDES ID MTR10I02A, had been issued to “MEYERCO LTD.” pursuant to construction of the facility, effective July 8, 2019 and expired February 15, 2022. Compliance with CGP requirements was not evaluated as part of this inspection.

Findings and recommendations pursuant to this inspection are included in the Findings and Recommendations section, below. The EPA is not requesting any corrective actions or a response to this inspection report.

Findings and Recommendations

Finding 1:

A portable canopy had been installed to provide shade over the lift station control panel. (b) (6) stated the canopy had been installed to prevent the control panel from overheating, as overheating had previously occurred and interfered with lift station controls.

EPA Guidance:

The EPA's September 2000 *Collection Systems Technology Fact Sheet, Sewers, Lift Station* (link included in Recommendation 2, below), states lift stations should "provide reliable and uninterrupted operation" and "allow for easy operation and maintenance," among other criteria.

Recommendation 1:

The EPA recommends evaluating the lift station control panel to determine whether it is performing adequately under the given operating conditions and evaluate the feasibility of making improvements to the control panel to prevent it from overheating and/or installing a permanent structure over the lift station control panel to provide more robust protection from the elements than is afforded by a portable canopy.

Recommendation 2:

The EPA recommends all facility owners and operators be familiar with potentially applicable Clean Water Act and NPDES requirements, as well as recommended operation and maintenance procedures, including, but not limited to, any information provided by facility consultants and contractors and the general information below:

- *Collection System Operation and Maintenance Fact Sheet, Sewer Cleaning and Inspection:*
<https://www3.epa.gov/npdes/pubs/sewcl.pdf>
- *Collection Systems Technology Fact Sheet, Sewers, Lift Station:*
https://www3.epa.gov/npdes/pubs/sewers-lift_station.pdf
- *Wastewater Technology Fact Sheet, Facultative Lagoons:*
<https://www3.epa.gov/npdes/pubs/faclagon.pdf>
- NPDES Permit Basics webpage:
<https://www.epa.gov/npdes/npdes-permit-basics>
- *A Plain English Guide to the EPA Part 503 Biosolids Rule:*
<https://www.epa.gov/sites/default/files/2018-12/documents/plain-english-guide-part503-biosolids-rule.pdf>

Additional resources are available on the EPA's website and from EPA personnel.