



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: Region 8, Montana Office

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chris Adler, Mayor
City of Ronan
207 Main Street SW, Suite A
Ronan, Montana 59864

Re: Inspection Report for Ronan Wastewater Treatment Facility, MT0021474

Dear Mayor Adler:

On June 14, 2022, representatives of the U.S. Environmental Protection Agency and The Confederated Salish & Kootenai Tribes of the Flathead Reservation (CSKT) inspected the Ronan Wastewater Treatment Facility in Ronan, Montana, to evaluate compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit requirements and the Clean Water Act. The inspection was conducted under the authority of Section 308 of the Clean Water Act (Act). Enclosed is a report of the inspection.

Inspection findings are summarized within the enclosed inspection report in a table titled "Findings, Corrective Actions and Recommendations." Within **thirty (30) days** of receipt of this report, please provide the EPA with a summary of corrective actions taken to address each of the findings identified in the report and any information that may change the findings or content of the report. This summary should be sent to:

Lisa-kay Prideaux
EPA Region 8
Prideaux.Lisakay@epa.gov

Wilhelmina Keenan
CSKT Environmental Director
Willie.keenan@CSKT.org

Please contact me at 406-457-2055 or Prideaux.lisakay@epa.gov if you have any questions regarding this letter or the enclosed report.

Sincerely,

Prideaux,
LisaKay

Lisa-kay Prideaux
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Digitally signed by Prideaux,
LisaKay
Date: 2022.08.11 14:10:55
-06'00'

Enclosures:

- 1) NPDES Inspection Report
- 2) Photo Log

cc (electronic):

The Honorable Tom McDonald, Chairman, CSKT (email)
Wilhelmina Keenan, Environmental Director, CSKT (email)
Evan Smith, Water Quality Regulatory Specialist, CSKT (email)

NPDES Inspection Report – Wastewater Lagoon

National Database Information		
Inspection Date: June 14, 2022	Inspection Type: Compliance Evaluation Inspection	
Entry/Exit Time: 13:00/16:00	NPDES ID Number: MT0021474	
NAICS Code: 22132 (Sewage Treatment)	Inspection ID: 200206_MT0021474	
Lead inspector and affiliation: Lisa-kay Prideaux / US EPA Region 8 Montana Operations Office		
Inspector and affiliation: Evan Smith / The Confederated Salish & Kootenai Tribes of the Flathead Reservation		

Facility Location Information (Name/Location/ Mailing Address)	
Site/Facility Name & Location: Ronan Wastewater Treatment Lagoons 36780 Mink Lane Ronan, Montana 59864	Mail Report to: Mayor Chris Adler 207 Main Street SW, Suite A Ronan, Montana 59864

Contact Information	
	Name(s)/Title
Facility Contacts:	Dan Miller / Public Works Director / City of Ronan / present during inspection
Person/Company meeting definition of "Operator"	Trey Sinclair / Wastewater Operator / City of Ronan / present during inspection
Authorized Official(s)	Chris Adler / City of Ronan Mayor / not present
Tribe Representative(s)	Evan Smith / The Confederated Salish & Kootenai Tribes of the Flathead Reservation / present during inspection
Indian Health Service Representative(s)	None present

Permit Information		
Is the permit on site and available? N/A	Lagoon Category: Partial Aeration	Monitoring Frequency: N/A
Effective Date: N/A	Expiration Date: N/A	Is the Facility under a compliance schedule? N/A
Is correct contact information indicated on ICIS? Yes		Indicate correct contact information:
Receiving Water(s): Unnamed tributary to Crow Creek		
Discharge point location (longitude, latitude): 47.520556°N; -114.116398°W		
Regulatory Inspector's source of information: Previous NPDES Permit, previous NPDES Statement of Basis, EPA records, facility records, facility representatives, and field observations		

Areas Evaluated During Inspection		
<i>Permit</i>	<u>Effluent/Receiving Waters</u>	<i>Compliance Schedule</i>
<u>Records/Reports</u>	<u>Flow Measurement</u>	<i>Discharge Monitoring Reports</i>
<u>Facility Site Review</u>	<i>Monitoring Program</i>	<u>Lift Station Operation and Maintenance</u>
<u>Collection System Review</u>	<i>Lagoon Self- Inspections</i>	<i>Preventive and Emergency Operation and Maintenance</i>

Report Review and Signature		
Drafter Signature/Name	Address/Phone Number	Date
Prideaux, LisaKay Digitally signed by Prideaux, LisaKay Date: 2022.08.11 14:11:46 -06'00'	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626	08.03.2022
<i>Lisa-kay Prideaux</i>	406-457-5022	
Reviewer Name	Address/Phone Number	Date
Kristin Ratajczak	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	08.04.2022
<i>Kristin Ratajczak</i>	303-312-6310	
Management Signature/Name	Address/Phone Number	Date
Boeglin, Michael Digitally signed by Boeglin, Michael Date: 2022.08.11 12:54:29 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NP Denver, Colorado 80202	08.11.2022
<i>Michael Boeglin</i>	303-312-6250	

Inspection Narrative and Site Description

The City of Ronan owns and operates the Ronan Wastewater Treatment Lagoon system (facility) located on the Flathead Reservation, in Ronan, Montana. EPA Region 8 issues National Pollutant Discharge Elimination System (NPDES) permits on tribal lands in Montana. The facility's NPDES permit is currently expired (June 30, 2018); however, an application was submitted, and a draft permit is currently out for public comment with the permit number MT0021474. The facility is currently under an active Administrative Order (CWA-08-2019-0007), filed September 5, 2019. The U.S. Environmental Protection Agency (EPA) conducted an inspection at the City of Ronan's wastewater treatment system to evaluate the facility's compliance with the Clean Water Act and the Administrative Order.

On Tuesday, June 14, 2022, EPA inspector Lisa-kay Prideaux, and the Water Quality Regulatory Specialist for the Confederated Salish Kootenai Tribes, Evan Smith, conducted an announced inspection of the facility. The inspection commenced at approximately 13:00, when inspectors arrived at the Ronan City Hall, presented credentials and identification to Dan Miller, the City of Ronan's Public Works Director, and Trey Sinclair, the City of Ronan's Wastewater Treatment Operator, and had an opening conference to explain the purpose of the inspection. The inspectors proceeded to ask a series of questions of the facility representatives, review documentation, and complete a site visit to evaluate the facility. Throughout the inspection, observations and photograph descriptions were documented. All photographs taken during the inspection are included in the attached photo log.

Mr. Miller and Mr. Sinclair provided the history and overview of the treatment system. The original facility was constructed in the mid-1960s as three lagoon cells. In the late 1980s, the facility was upgraded to include adding a lift station and aerators in the lagoon cells, as well as upgrading collection system piping. In 1997-1998 the facility added two wetland cells and increased the number of aerators. In 2009 the facility completed another upgrade to add ultraviolet (UV) disinfection to the treatment process. Today, the system consists of three (3) lift stations, one (1) grinder pump, an aerated lagoon system with three (3) clay-lined lagoon cells and two (2) constructed wetland cells with UV disinfection.

Mr. Miller and Mr. Sinclair stated the collection system is approximately 70% cement/asbestos or clay/tile and have issues with inflow/infiltration (I/I). The facility bought a Vac truck in 2021 and are on a 4-year system jet cycle with annual jetting at chronic problem sites and/or low spots within the collection system piping. They stated roof drains and basement pumps go into the collection system because there isn't a prohibition in the city ordinance, or a stormwater drain system.

The facility serves the businesses and residents of the City of Ronan with a population of approximately 2,000 persons. The lagoon treatment process begins with raw sewage entering Cell 1 via an influent manhole. Cell 1 is aerated with 19 aerators; cell 2 is also aerated with 20 aerators. Cell 3 is facultative and is used as polishing treatment of the wastewater. Wastewater then flows to one of two wetland cells (cells 4A and 4B), constructed in parallel, for final treatment. Wastewater from Cells 4A and 4B combine and flow to the UV disinfection building where disinfection occurs and required sampling of the effluent is conducted. Treated wastewater is discharged at the outfall location, which is just outside of the UV disinfection building. From the outfall, treated wastewater flows west then south along an unnamed wetland area with a tributary to Crow Creek. Crow Creek is approximately two (2) miles from the facility.

Although there was not an effective NPDES permit at the time of the inspection, a review of facility records commenced, and inspectors reviewed records of monitoring conducted at the facility and facility operations and maintenance conducted and recorded. Regular inspections of the lift stations, grinder

pump, lagoon and wetland cells, UV system and discharge location were conducted and documented. The operators keep a daily log of maintenance activities, calibrations of meters, and sample collection records. The facility had Safety Data Sheets (SDSs) for all chemicals used, as-built engineering drawings, and operations and maintenance manuals. The facility did not have standard operating procedures (SOPs) for daily operations or sampling activities, or equipment inventory and maintenance tracking.

Because the draft NPDES permit was out for public notice, the inspectors reviewed the draft permit with Mr. Miller and Mr. Sinclair to make the operators aware of the significant increase in monitoring and compliance responsibilities in the draft. Potential upgrade options at the facility were discussed as a result of the upcoming effluent limits, specifically nutrients. Mr. Miller also stated a request for an ammonia variance would be forthcoming, as the facility cannot currently meet the proposed ammonia permit limit.

After the facility representative interviews and records review, the inspectors walked around the facility grounds. The inspectors started by observing the influent manhole to cell 1, and the three lagoon cells (photos 439-541). Mr. Miller stated they turned off the aerators for the inspection as they are noisy and not all aerators are currently in operational condition. Inspectors then walked around the constructed wetland cells (photos 542-544, & 546) and Mr. Miller commented the cattails within the cells were mature and potentially no longer functioning as designed. The group then walked to the UV building and observed the UV system, effluent flow meter, and effluent sampling port (photo 547). At the discharge pipe (photo 548), inspectors noted a slight amount of white foam. Effluent entered a large wetland complex associated with an unnamed tributary to Crow Creek (photo 545).

A closing conference was held on-site with Mr. Miller and Mr. Sinclair, during which inspectors discussed facility recommendations, as well as the process for the inspection report. The inspection concluded at approximately 14:00.

Findings, Corrective Actions and Recommendations

Finding #1:

The facility was discharging without a permit. Specifically, the facility was covered under NPDES permit MT0021474, which expired on June 30, 2018.

Regulatory requirement:

- Section 301(a) of the Clean Water Act, 33 U.S.C § 1311(a), prohibits the discharge of any pollutant by any person into waters of the United States except in compliance with a permit.
- Section 402 of the Clean Water Act, 33 U.S.C § 1342, requires a NPDES permit be obtained from the EPA prior to the discharge of pollutants into waters of the United States.

Corrective Action:

Comply with permit limits once permit is effective.

Finding #2:

The facility was not being operated and maintained as designed. Specifically, inspectors identified the following: the facility had excessive sludge accumulation documented for several years, particularly lagoon cell 1; the facility's wetland cells have old/mature cattails within the wetland cells which were causing the cells to not operate as designed; the facility does not have site specific SOPs for facility operations or sampling activities; and the facility does not have a tracking system for facility equipment inventory/maintenance.

EPA Guidance:

The EPA has developed guidance manuals on the proper operation and maintenance of lagoons.

- Guidance document titled "Compliance Tips for Small Wastewater Treatment Lagoons with Clean Water Act Discharge Permit" (March 2022, EPA Document #305F22002). <https://www.epa.gov/system/files/documents/2022-03/lagoon-complianceadvisory.pdf>
- Guidance document titled "Principles of Design and Operations of Wastewater Treatment Pond Systems for Plant Operators, Engineers, and Managers: (August 2011, EPA/600/R-11/088). <https://www.epa.gov/sites/default/files/2014-09/documents/lagoon-pond-treatment-2011.pdf>

Recommendation:

EPA recommends:

- Excessive sludge accumulation within the lagoon system is removed and properly disposed of.
- Removal of mature cattails in wetland cells to ensure nutrient removal uptake is restored to design.
- Create site-specific SOPs for facility operations and sampling activities.
- Create an equipment inventory list and a method to track inventory and associated maintenance activities.