



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

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Keith Smith, Director of Engineering
Glacier Park, Inc.
ksmith@prusuitcollection.com

Re: Inspection Report for St. Mary Wastewater Treatment Facility, NPDES Permit #MTG589103

Dear Mr. Smith:

On July 18, 2022, representatives of the U.S. Environmental Protection Agency (EPA) inspected the St. Mary Lodge and Resort's Wastewater Treatment Lagoons (Facility) in St. Mary, Montana, to evaluate compliance with the site's National Pollutant Discharge Elimination System Lagoon General Permit for non-discharging facilities. 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 and the Blackfeet Environmental Office (BEO) 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. This summary should be sent to:

Lisa-kay Prideaux
U.S. EPA Region 8, Montana Operations Office
Prideaux.Lisakay@epa.gov

Gerald Wagner
Blackfeet Environmental Office
Beo.director@gmail.com

Please contact me at 406-457-5022 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: 2022.09.13 06:39:50
-06'00'

Enclosures:

- 1) NPDES Wastewater Lagoon Inspection Report
- 2) Photo Log

cc (email):

Illif 'Scott' Kipp Sr., Tribal Chairperson
Gerald Wagner, Tribal Environmental Director
Jeremy Norheim, Master Plumber/Wastewater Operator
Patrick Hesser, Location Engineer

NPDES Wastewater Lagoon Inspection Report – No Discharge

National Database Information		
Inspection Date: July 18, 2022	Inspection Type: Compliance Evaluation	
Entry/Exit Time: 13:00 – 15:10	NPDES ID Number: MTG589103	
NAICS Code: 221320	Inspection ID: 202207 MTG589103	
Lead inspector and affiliation: Lisa-kay Prideaux, US EPA Region 8		

Facility Location Information	
Site/Facility Name & Location: St. Mary Wastewater Treatment Facility St. Mary, Montana 48.741605°N; -113.424252°W	Email Report to: Glacier Park, Inc. Keith Smith, Director of Engineering ksmith@prusuitcollection.com

Contact Information	
	Name(s)/Title
Facility Contacts:	Keith Smith, Director of Engineering, Glacier Park, Inc. (not present)
	Jeremy Norheim, Master Plumber & Wastewater Operator (present)
	Patrick Hesser, Location Engineer (present)
Person/Company meeting definition of “Operator”	Glacier Park, Inc.
Authorized Official(s)	Keith Smith, Director of Engineering, Glacier Park, Inc.
Tribes Representative(s)	None present during inspection
Indian Health Service Representative(s)	None present during inspection

Permit / Facility Information		
Is the permit on site and available? Yes	Lagoon Category: No Discharge	Monitoring Frequency: N/A
Effective Date: December 6, 2016	Expiration Date: December 31, 2020 (administratively continued)	Is the Facility under a compliance schedule? No
Is correct contact information indicated on ICIS? No		Indicate correct contact information: Cognizant official is Keith Smith 406-407-4591; mailing address is PO Box 147, East Glacier Park, Montana, 59434
Receiving Water(s): No Discharge (land-applied)		
Facility location (longitude, latitude): 48.741605°N; -113.424252°W		
Regulatory Inspector’s source of information: Previous NPDES permit, previous NPDES statement of basis, Previous NPDES inspections, EPA records, facility records, facility representatives, and field observations.		

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

Report Review and Signature		
Drafter Signature/Name	Address/Phone Number	Date
Prideaux, LisaKay Digitally signed by Prideaux, LisaKay Date: 2022.09.13 06:40:46 -06'00'	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626 Prideaux.lisakay@epa.gov	
<i>Lisa-kay Prideaux</i>	406-457-5022	
Reviewer Name	Address/Phone Number	Date
Akash Johnson	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202 303-312-6067	9/6/2022
Management Signature/Name	Address/Phone Number	Date
Boeglin, Michael Digitally signed by Boeglin, Michael Date: 2022.09.13 00:03:29 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/13/2022
<i>Michael Boeglin</i>	303-312-6250	

Inspection Narrative and Site Description

The U.S. Environmental Protection Agency (EPA) conducted an announced inspection at the St. Mary wastewater treatment facility (facility) to evaluate the facility's compliance with the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) permit MTG589103.

Glacier Park Inc. owns and operates the facility, located on the Blackfeet Reservation, in St. Mary, Montana. The EPA directly implements the Clean Water Act and NPDES requirements at the facility. The facility is permitted under the 2016 NPDES Lagoon General Permit (2016 General Permit) as a "no discharge" facility. The 2016 General Permit expired on December 31, 2020; however, the facility's authorization was administratively continued because a new General Permit had not been issued at the time the 2016 General Permit expired. The EPA Region 8 issued a new General Permit (2022 General Permit) which became effective on April 1, 2022 and will expire on March 31, 2027. The facility submitted a Notice of Intent to comply with the 2022 General Permit on June 30, 2022. As of this report, the EPA is reviewing the application information and coverage under the 2022 General Permit has not been issued.

On Monday, July 18, 2022, I, EPA inspector Lisa-kay Prideaux, conducted an announced inspection at the facility. The inspection commenced at approximately 13:00, when I arrived at the Sinclair gas station off Highway 89 in St. Mary. I followed representatives to the facility. After arriving at the facility, I presented my inspector credentials to Jeremy Norheim, Master Plumber and wastewater operator, and Patrick Hesser, Location Engineer, and had an opening conference to explain the purpose of the inspection. I asked a series of questions of the facility representatives to help evaluate the facility operations and compliance. Throughout the inspection, observations and photograph descriptions were documented in a field logbook. All photographs taken during the inspection are included in the attached photo log.

The St. Mary facility is a two-celled, aerated lagoon system with two (2) lift stations and typically no discharge. The facility serves seasonal facilities including a gas station, Glacier Park employee housing, and lodging. There are approximately 48 rooms in the Great Bear Lodge, 24 rooms in the West Motel, 6 rooms in the main lodge at St. Mary Village, 10 tiny homes, 10 cabins and public restrooms in the Sinclair gas station. The gas station is open from May to mid-October, and the lodges and employee housing are open from June 1 to mid-October; all opening/closures are subject to snow conditions.

Wastewater collected from the store and lodging flows to lift station #1 which flows to lift station #2 before entering the lagoons; wastewater from employee housing flows directly to lift station #2 and into the lagoon system. Each lift station has a settling tank prior to overflowing into the lift station, and each lift station is equipped with a grinder pump and two (2) additional alternating pumps connected to a float system with high/low alarms and shut-off system. Each lift station has the capacity to hold several hours of wastewater should a power outage occur, during which a pump truck could arrive to transfer wastewater to lagoon cell 1. The settling tanks are pumped out every fall, just before closing for the season.

All influent enters cell 1 in the southwest corner. Cell 1 has two (2) aerator mixers which run nightly for 8 hours. Wastewater leaves cell 1 in the northeast corner through an overflow pipe into cell 2 in the southeast corner; cell 2 is a facultative cell. Wastewater is drawn out of cell 2 on the west center side of the cell for use to irrigate an adjacent 6-acre grassy area. The 6-acre parcel is located directly west and north of lagoon cell 2. The frequency at which the facility irrigates is dependent on an automated irrigation

system which includes a weather station. If weather is determined to be too windy or a precipitation event is actively occurring, the irrigation system does not turn on. A retention pond is located downgradient (to the north) of the 6-acre parcel. This pond is a total retention pond and captures stormwater as well any water from over-irrigation; no discharge occurs from this pond.

After a background description of the facility, I began an on-site review of facility records. A copy of the permit and authorization letter were on-site, as well as a record of how much wastewater has been irrigated. Mr. Norheim is a Montana 3C-certified wastewater operator who is primarily responsible for routine operation and maintenance of the Facility. Mr. Norheim stated he inspects the facility weekly, and a work order is completed to document his inspection. A review of a work order template indicated not all elements required in the General Permit are being inspected on a weekly basis. Mr. Norheim also stated there are infrequent instances of backups in the gas station restrooms.

After the facility representative interviews and records review, facility representatives accompanied me on a walk around the facility grounds. We started by observing the influent manhole, lagoon cell 1 with the two mixers (photo 549) and lagoon cell 2 (photo 552), along with the divider between cells where the overflow pipe exists (photo 550). We then walked to the irrigation pump building and observed the pump system, and effluent sampling port (for internal testing as well as for the management of nutrients on the irrigation fields (photo 551). We then walked through the irrigation field (photos 553 & 554) to the old retention pond area north of the irrigation field (photo 555).

A closing conference was held on-site with Mr. Norheim and Mr. Hesser, during which I discussed preliminary findings and recommendations, as well as the process for the inspection report. The inspection concluded at approximately 14:00 on July 29, 2022. Preliminary findings were summarized in an email I sent to Mr. Smith on July 29, 2022. An example of an inspection form was provided with preliminary findings per Mr. Norheim's request.

Findings, Corrective Actions and Recommendations

Finding #1: Inspection reports were missing several elements and corrective actions.

Specifically, inspection reports of the lagoon cells were missing permit number for the facility and an evaluation of the lagoon for leakage, animal burrows, erosion, vegetation, and corrective actions completed.

Permit requirement:

Part 4.3.1 of the 2016 General Permit states, "On at least a weekly basis, unless otherwise modified by written approval from the EPA, the permittee shall inspect its wastewater treatment facility. The permittee shall maintain a notebook recording all information obtained during the inspection. At a minimum, the notebook shall include the following:

- 4.3.1.1. Name of facility and permit number;
- 4.3.1.2. Date and time of the inspection;
- 4.3.1.3. Name of the inspector(s);
- 4.3.1.4. The facility's discharge status;
- 4.3.1.5. The flow rate of the discharge if occurring;
- 4.3.1.6. If a discharge is occurring, has occurred since the previous inspection, and/or if a discharge is likely to occur before the next inspection.

- 4.3.1.7. Is there is any leakage through the dikes;
- 4.3.1.8. Are there are any animal burrows in the dike;
- 4.3.1.9. Is there any erosion of the dikes (e.g., rills, cracks or other structural indications of erosion);
- 4.3.1.10. Are there are any rooted plants, including weeds growing in the water;
- 4.3.1.11. Does the vegetation growth on the dikes needs mowing (e.g. greater than 6" tall);
- 4.3.1.12. List the date scheduled for operation and maintenance procedures to be undertaken at the wastewater treatment facility.
- 4.3.1.13. Identification of operational problems and/or maintenance problems;
- 4.3.1.14. Recommendations, as appropriate, to remedy identified problems;
- 4.3.1.15. A brief description of any actions taken with regard to problems identified; and,
- 4.3.1.16. Other information, as appropriate.

Part 4.3.2 of the 2016 General Permit states the permittee shall maintain the notebook in accordance with required record-keeping items and shall make the log available for inspection, upon request, by authorized representatives of the EPA or the applicable Tribe.

Part 4.3.3 of the 2016 General Permit states, any problems identified during the inspection shall be listed with corrective action and a time frame to correct the issue. Example: repair cracks in North berm, remove animal and repair burrow, within 7 days.

Part 6.5 of the 2016 General Permit states, the permittee shall 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 include 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 a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance. In addition to the operation and maintenance items in the manual for the lagoon system, the permittee shall do the following maintenance:

- 6.5.1. Take necessary action to promptly correct the problem of leakage through the dikes;
- 6.5.2. Take necessary action to promptly remove burrowing animals from the dikes;
- 6.5.3. Promptly repair damage to dikes caused by burrowing animals and/or erosion;
- 6.5.4. Remove rooted plants, including weeds, from the water on a regular basis or as needed; and
- 6.5.5. Keep the dikes mowed on a regular basis during the growing season or as needed (e.g., keep growth below 6" in height)."

Corrective Action:

Ensure inspection reports document all required permit requirements. Implement corrective actions identified during inspections within the required timeframe. In the response to this report, provide EPA and the Blackfeet Environmental Office with a description of the corrective actions taken to address this finding.