

NPDES Reconnaissance Inspection Report

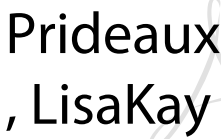
National Database Information	
Inspection Date: 12/19/2022	Inspection Type: Reconnaissance Inspection
Entry/Exit Time: 10:54 / 12:50	WPDES ID Number: WY0021032
NAICS Code:	Inspection ID: 202212 WY0021032
Lead inspector and affiliation: Lisa-kay Prideaux, U.S. EPA Region 8, Montana Operations Office	
Inspector and affiliation: Tori Nye, Wyoming Department of Environmental Quality	

Facility Location Information	
Site/Facility Name & Location: Town of Cokeville 3000 Collett Avenue 42.081963°N; -110.976703°W	Mail Report (electronic delivery) to: Stan Thompson Jr. tocmayor@allwest.net

Contact Information	
	Name(s)/Title
Facility Contacts:	Mike Duran, Assistant Public Works Director (present) Todd Brown, Contract Certified Wastewater Operator (present) Marcus Fleming, Cokeville Wastewater Operator in Training (present)
Person/Company meeting definition of "Operator"	Town of Cokeville
Authorized Official(s)	Stan Thompson Jr., Mayor (not present)
State Representative(s)	Tori Nye, Wyoming Department of Environmental Quality (present)

Permit Information		
Is the permit on site and available? yes	Discharge Category: Intermittent	Monitoring Frequency: daily/monthly/7x per quarter
Effective Date: 01/01/2021	Expiration Date: 12/31/2024	Is the Facility under a compliance schedule? Downstream monitoring
Is correct contact information indicated on ICIS? No	Indicate correct contact information: Stan Thompson Jr., Mayor tocmayor@allwest.net	
Receiving Water(s): Bear River		
Discharge point location (longitude, latitude): 42.082484°N; -110.976716°W		
Regulatory Inspector's source of information: WPDES individual permit WY0021032, Statement of Basis for WY0021032, Integrated Compliance Information System (ICIS), Enforcement & Compliance History Online (ECHO), Aerial imagery, EPA records, Wyoming Department of Environmental Quality records and staff, facility personnel, and site review.		

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

Report Review and Signature		
Drafter Signature/Name	Address/Phone Number	Date
 Digitally signed by Prideaux, LisaKay Date: 2023.02.15 14:23:21 -07'00'	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626	02/14/2023
<i>Lisa-kay Prideaux</i>	406-457-5022	
Reviewer Name	Address/Phone Number	Date
	Wyoming Department of Environmental Quality 1625 W. Pine Street Pinedale, Wyoming 82941	02/13/2023
Tori Nye	307-349-7474	
Management Signature/Name	Address/Phone Number	Date
 Digitally signed by MICHAEL BOEGLIN Date: 2023.02.15 09:00:03 -07'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	02/15/2023
<i>Michael Boeglin</i>	303-312-6250	

Inspection Narrative and Site Description

Introduction

The Town of Cokeville's Wastewater Treatment Plant (facility) is located to the west of town off County Road 207. The facility is not located within the external boundaries of any federally recognized Indian Reservation. The facility is currently under an individual Wyoming Pollutant Discharge Elimination System (WPDES) permit, which was renewed effective January 1, 2020, and will expire on December 31, 2024.

The Town of Cokeville operates two different treatment technologies to service the town of 535 citizens (2010 census). The first, and main treatment unit, is an activated sludge package mechanical plant with a 0.12 MGD design flow. This package plant was installed in 2008/2009 and consists of a septage receiving station, headworks structure with coarse screening and grit removal, aeration basin with two rotating aeration wheels, rectangular clarifier with solids drag removal, and UV disinfection. The second unit operates as a stabilization system for infiltration and inflow (I/I). Cells two and three original lagoon system cells are utilized for flow equalization. When used, wastewater is pumped back through the mechanical plant in a controlled manner. The current permit specifically identifies a discharge from the lagoon cells is not permitted except as an emergency outfall. The 2017 Notice of Violation and Order (discussed below) indicated a disinfection method must be installed in case of a potential bypass event and emergency discharge out of outfall 002. Cell one of the original lagoon system is used for additional sludge storage for the mechanical plant.

On December 19, 2022, Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux, and Wyoming Department of Environmental Quality (WDEQ) inspector Tori Nye (inspectors), conducted a site visit of the Town of Cokeville's Wastewater Treatment Plant, located off county road 207 approximately 0.25 miles from the junction of Collett Avenue, West Main Street, and County Road 207, in Cokeville, Wyoming, to evaluate compliance with WPDES permit requirements and the Clean Water Act.

After arriving at the facility at approximately 10:30, I presented my inspector credentials to Mr. Mike Duran, Assistant Public Works Director, Mr. Todd Brown, Cokeville's contract certified wastewater operator, and Mr. Marcus Fleming, Cokeville's wastewater operator apprentice and had an opening conference to explain the purpose of the inspection. The inspectors asked a series of questions to review information regarding the history of the facility, recent upgrades, as well as current operations and maintenance at the facility. 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.

Background

The State of Wyoming DEQ issued a Notice of Violation and Order on December 14, 2017, to upgrade the facility to meet permitted effluent limits, to have an engineering assessment completed with options for upgrades to the system, to eliminate any discharge from the lagoons without prior installation of disinfection method out of outfall 002, to update the SCADA system, and to install a pump back system from lagoons to the treatment plant prior to discharge. Wyoming DEQ reached out to the EPA in November 2021, for assistance with the Town of Cokeville, and to help bring the facility back into compliance. Through the cooperation of WDEQ, EPA, and the Town of Cokeville, continued efforts for operational improvements and compliance assistance with permit requirements is ongoing. Below is a timeline of events compiled from data obtained through the Integrated Compliance Information System database and the Enforcement and Compliance History Online website, as well as meetings, phone calls, and site visit. Although some items entered into the database in 2013 occurred prior to 2013, they remain on the timeline to show a history of limit exceedances and mechanical difficulty at the facility. Items without an action ID were obtained from meetings and conversations with WDEQ staff or Town of Cokeville facility personnel.

Action ID	Action Name	Action Entry Date	Action
	Construction complete	2009	Construction of the package plant was complete
2860	Comment	03/04/2013	On Sept 16, aerator in 1st cell broke down. Parts were unavailable

			for old equipment. 9/02 exceedance but Town is in process of purchasing new low speed aerator.
3004	Comment	03/04/2013	Error in sampling frequency for fecal. Will prepare better scheduling in the future to ensure 1-5-1 system for fecal.
3823	Comment	03/04/2013	Exceed 5-day biochemical oxygen demand (BOD ₅) and total suspended solids (TSS) due to broken aerator. New aerator has been purchased and will install as soon as ice is off the pond.
3990	Comment	03/04/2013	Exceed BOD ₅ and TSS 01/03/2003 due to broken aerator. New aerator to be installed in April
4368	Comment	03/04/2013	Exceed BOD ₅ : New aerators have been installed and operating. Expect it will take a couple months for ponds to stabilize.
4809	Comment	03/04/2013	Cover letter with discharge monitoring reports (DMRs) rec'd 01/22/2004. Exceed BOD ₅ limits per permit requirements, may be due to early cold weather and icing over the ponds. Will watch test results, if BOD ₅ limits still high, more aerators may be needed for ponds.
5333	Comment	03/04/2013	DMR review 1st quarter 2004:001- exceed BOD ₅ as a result of the cold weather. The aerator was frozen in and was unable to run. Got it running on 03/30/2013 so expect April to be questionable. Will watch test results closely to monitor result.
5931	Comment	03/04/2013	DMR letter for 2nd quarter 2013, BOD ₅ high. Contracted consultant to determine best modifications to perform. There were several BOD ₅ exceedances in the 2nd quarter 2005. They are in the final stages of updating the lagoons and will notify the division when they are completed.
8371	Comment	03/04/2013	001 - BOD ₅ exceeds the monthly average of 30 mg/L and the weekly average of 45 for October (47 mg/L for both), November (47 mg/L for both), and December (62 mg/L; exceeds monthly average only). Permittee is in the final stages of upgrading lagoons. Same in the 1 st quarter 2006, exceeded the monthly average all three months. Still in the process of lagoon upgrades.
9955	Comment	03/04/2013	4th quarter of 2006. Grant has been approved of sewer system. Fecal exceed limits for whole quarter.
12831	Comment	03/04/2013	2 nd quarter 2010 DMR exceedances
34001 48028	Inspection	08/20/2013	No Findings identified
16009	Exceedance Notification	05/07/2014	Violation letter issued. TSS Percent Removal exceedances. Cover letter provided explaining.
16203	Exceedance Notification	10/27/2014	Violation letter issued. Letter provided regarding BOD % Removal exceedance. Letter provided regarding BOD % Removal exceedance. <i>Escherichia coli</i> bacteria (<i>E.coli</i>) also exceeded in newest version of permit, but not original version. <i>E.coli</i> also exceeded in newest version of permit, but not original version.
36004 41608	Inspection	11/18/2015	Compliance inspection: No findings noted.
16263	Letter of violation	12/17/2016	Violation letter issued. LOV issued regarding Missing information for pH and BOD. 2nd quarter 2014.
36011 62232	Inspection	08/31/2017	Compliance Inspection: No findings noted.
17402	Notice of Violation and Order (NOVO) Docket #5811-17	12/14/2017	Order to upgrade the facility to meet effluent requirements for <i>E.coli</i> and others. Order to have an engineering assessment completed with options for upgrades to the system. Eliminate any

	(currently active)		discharge from the lagoons without prior installation of disinfection method (002). Install a pump back system from lagoons to the treatment plant prior to discharge. Order to update the SCADA system.
17151	Letter of violation	04/10/2019	Violation letter issued. LOV issued regarding missing information and exceedances – 2016; not submitting required information from NOVO
	Permit effective	01/01/2020	Permit WY0021032 issued with new monitoring requirements, effluent limits and conditions.
36022 55331	Inspection	08/11/2020	Analytical data and Chain of Custody forms were available, but the Town has not submitted DMRs since 2018 so there was nothing to compare the analytical reports to. There were discussions about adding columns to the table that pH is being tracked on to include the 4.0 calibration buffer, and a place to manually mark down flow. Inspection report findings include failure to operate and maintain plant as designed, flow meters require re-calibration, and disinfection system requires maintenance.
	Warning Letter	01/13/2021	Notice of significant non-compliance for failure to submit DMRs for all monitoring periods in 2019 and April-September of 2020.
	Notification	04/12/2022	Notification from contract operator (Todd Brown) stating the rotating assembly broke. He suspects it is the bearings submerged in the wheelhouse. They are draining the tank into the lagoon as well as diverting all influent.
	Notification	04/21/2022	Notification from WDEQ that Cokeville just hired a new operator, Marcus Fleming, and he will be in the Wyoming wastewater apprenticeship program until his certification is obtained.
	Notification	04/25/2022	Notification from Todd Brown to state the facility has ordered new bearings but were not given an estimated delivery date due to the supply/demand chain being affected by COVID-19 restrictions. Proposed WDEQ/EPA site visit postponed until fall when facility is operational.
17853	Letter of violation	05/19/2022	Violation letter issued. Nonsubmittal LOV issued out for 2017-2018 missing DMRs. Submitted Missing DMRs
17729	Letter of violation	05/19/2022	Violation letter issued. Letter of violation for permit WY0021032 regarding delinquent DMRs. Nonsubmittal LOV for 2 nd -4 th quarter 2017 and 1 st -3 rd quarter 2018. Submitted Missing DMRs
	Notification	06/09/2022 - 10/20/2022	Weekly communication with the Town of Cokeville and/or WDEQ with updates on parts delivery, insurance claims, lagoon volumes/ability to continue holding without discharge.
	Notification	10/20/2022	Notification from Todd Brown that parts are being delivered this week and manufacturer is to be on-site next week to fix the system.
	Notification	11/16/2022	Notification from Todd Brown that manufacturer is on-site now and finishing installation. Todd stated they would be seeding the facility next week from nearby plant. EPA stated a site visit would be occurring the week of December 19, 2022.
	Site Visit	11/16/2022	WDEQ on site to verify maintenance was occurring and obtain updates for plant start-up. The plant was not in operation at the time of the site visit.
	Notification	12/12/2022	Message from Todd Brown that the plant was in operation
36034	Inspection	12/19/2022	EPA/WDEQ joint reconnaissance inspection. The plant was not

Records Review

Prior to the inspection, a review of DMR records from 2020 through to the inspection was conducted in ICIS as well as ECHO for DMR submittals, and for compliance with permit limits. The following table identifies excursions from the WPDES permit:

Parameter	Monitoring/Reporting Frequency	Monitoring periods
Discharge Monitoring Reports (DMRs)	part or complete missing	04/30/2020, 05/31/2020, 06/30/2020, 07/31/2020, 08/31/2020, 09/30/2020, 10/31/2020, 01/31/2021, 02/28/2021, 03/31/2021; 04/30/2021, 06/30/2021, 07/31/2021, 08/31/2021, 09/30/2021, 10/31/2021, 11/30/2021, 12/31/2021, 02/28/2022, 03/31/2022, and 04/30/2022
Flow, MGD	daily maximum	08/31/2020, 07/31/2021, 01/31/2022, and 03/31/2022
5-day Biochemical Oxygen Demand (BOD ₅), mg/L	daily maximum, 30-day average and/or percent removal concentrations	06/30/2020, 07/31/2020, 08/31/2020, 09/31/2020, 10/31/2020, 01/31/2021, 02/28/2021, 03/31/2021, 08/31/2021, 09/30/2021, 12/31/2021, 03/31/2022, and 04/30/2022
Total Suspended Solids (TSS), mg/L	daily maximum, 30-day average and/or percent removal concentrations	03/31/2020, 06/30/2020, 08/31/2020, 09/31/2020, 10/31/2020, 01/31/2021, 02/28/2021, 03/31/2021, 05/31/2021, 06/30/2021, 08/31/2021, 09/30/2021, 10/31/2021, 11/30/2021, 03/31/2022, and 04/30/2022
<i>Escherichia coli</i> bacteria (<i>E. coli</i>), MPN colonies	daily maximum and/or 30-day average counts	01/30/2020, 02/29/2020, 03/31/2020, 06/30/2020, 07/31/2020, 08/31/2020, 09/30/2020, 10/31/2020, 01/31/2021, 02/28/2021, 03/31/2021, 06/30/2021, 08/31/2021, and 09/30/2021
Ammonia, Total as N, mg/L	daily maximum concentrations	08/31/2020, 09/31/2020, and 10/31/2020
Total Residual Chlorine (TRC), mg/L	7-day maximum concentration	01/31/2021

Site inspection

After a review of the timeline of events and records, the inspectors asked to review the facility grounds. Mr. Brown stated that the mechanical plant was currently not in operation. He stated that after the manufacturers fixed the bearings and wear sleeves, the tank was filled and seeded (early December 2022), the wheel did not turn in the direction as designed. The facility started the wheel in the opposite direction, and it began to turn; however, the manufacturer's engineer suggested the facility shut it down as running the wheel in the wrong direction could damage the integrity of the tank walls. The facility heeded the engineer's suggestion and shut the plant back down. While the engineers work on the problem, the facility is discharging to the lagoon cell again. At that time, we walked out to see the lagoon system. Lagoon cell 1 (photo 559) is the only cell that receives influent flow, and the lagoon water level appears to be inches away from overtopping in some locations. The facility placed a riser pipe over the overflow pipe as to not allow wastewater to discharge into lagoon cell 2 (photo 558). Lagoon cell 2 has an outlet (previous discharge point) to the irrigation ditch and into Bear River. The facility is not allowed to discharge out of this previous outfall, and therefore has not allowed overflow from lagoon cell 1 into lagoon cell 2. The inspectors' immediate concern is lagoon cell 1 and the potential for the cell to overtop and potentially have a dike wall breach and slug discharge into Bear River; therefore, the inspectors provided some suggestions for the facility to consider to include installing a riser pipe at the outfall location to prevent the discharge out of cell 2, request the WDEQ to consider re-permitting the outfall location out of cell 2, or temporarily route the discharge from the outfall in cell 2 through the UV building and out the currently permitted outfall location. The facility needs to assess how long the repair to the mechanical plant will take, how much influent lagoon cell 1 will hold

without breaching, and an alternative plan to holding wastewater in cell 1 only. We walked by the facility's aerated digester (photo 557) for sludge processing when the mechanical plant is running, and the current outfall location (photos 560-562) into an irrigation ditch which flows to Bear River.

A closing conference was held on-site with Mr. Duran, Mr. Brown, and Mr. Fleming, during which the inspectors explained preliminary findings/recommendations, and the process for this report. The inspection concluded at approximately 12:50.

Findings, Corrective Actions and Recommendations

Finding #1: The facility has not submitted required DMRs

The facility has not submitted complete DMRs for the following monitoring periods: 04/30/2020, 05/31/2020, 06/30/2020, 07/31/2020, 08/31/2020, 09/30/2020, 10/31/2020, 01/31/2021, 02/28/2021, 03/31/2021; 04/30/2021, 06/30/2021, 07/31/2021, 08/31/2021, 09/30/2021, 10/31/2021, 11/30/2021, 12/31/2021, 02/28/2022, 03/31/2022, and 04/30/2022.

Permit requirement:

Part 1.D.2 of permit WY0021032 states "Effluent monitoring results obtained during the previous three month(s) shall be summarized and reported on a Discharge Monitoring Report Form." "The reports must be received by the agency no later than the 28th day of the month following the completed reporting period." "If no discharge occurs during the reporting period, "no discharge" shall be reported."

Corrective Action:

The facility must submit all missing or partial DMRs. In the future, the facility must submit all DMRs by the date required within the permit. In the response to this report, provide the EPA and WDEQ with a description of the corrective actions taken to address this finding.

Finding #2: Improper Operations and Maintenance

The facility has reported a total of 51 effluent limit exceedances between the timeframe of January 1, 2020, and October 31, 2022.

Permit requirement:

Part 1.A of permit WY0021032 states "Effective immediately and lasting through December 31, 2024, the quality of effluent discharged by the permittee shall, at a minimum, meet the limitations set forth below."

Part 1.A.1.a of permit WY0021032 states "Any single analysis and/or measurement beyond this limitation shall be considered a violation of the conditions of this permit."

Corrective Action:

The facility must operate and maintain the facility as designed in order to meet the required effluent limitations set forth in permit WY0021032. In the response to this report, provide the EPA and WDEQ with a description of the corrective actions taken to address this finding.

Finding #3: Improper Operations and Maintenance

The facility is not operating the primary treatment unit and is using its secondary treatment unit as primary. The current permit approved the secondary treatment unit for inflow/infiltration flow equalization only. Although the facility was not discharging at the time of the inspection, the system is required to be operated and maintained in accordance with the application, statement of basis, and permit issued for the treatment process.

Permit requirement:

The Statement of Basis associated with permit WY0021032, under Facility Description, states "The first treatment unit that collects the domestic waste portion of the town on a regular basis is an activated sludge package mechanical plant with a 0.12 MGD design flow. It consists of a septage receiving station, headworks

structure with course screening and grit removal, aeration basin with two rotating aeration wheels, rectangular clarifier with solids drag removal, and UV disinfection.” The Statement of Basis also states “The second unit operates as a stabilization system for infiltration and inflow (I/I).”

Corrective Action:

The facility must operate and maintain the facility as designed. In the response to this report, provide the EPA and WDEQ with a description of the corrective actions taken to address this finding.