



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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

Ref: 8 Montana

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Kasey Hastheagle
Director of Prairie Mountain Utilities
Kasey.hastheagle@ftbelknap.org

Re: Inspection Report for Fort Belknap Mission Wastewater Lagoons, MTU000031

Dear Kasey Hastheagle:

On July 19, 2023, representatives of the U.S. Environmental Protection Agency conducted a compliance evaluation of the Fort Belknap Mission wastewater lagoon south of Hays, Montana, to evaluate compliance with the Clean Water Act and EPA regulations. 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
U.S. EPA Region 8
Prideaux.Lisakay@epa.gov

Ina Nez Perce, Environmental Director
Fort Belknap Indian Community of the Fort Belknap Indian Reservation
Inperce@ftbelknap.org

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

Digitally signed by Prideaux,
LisaKay
Date: 2023.08.24 12:54:49
-06'00'

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

Enclosures:

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

cc: Jeffrey Stiffarm, President, Gros Ventre and Assiniboine Tribes of the Fort Belknap Reservation (email)
Ina Nez Perce, Environmental Director, Fort Belknap (email)
Gene Talks Different, Water Plant Manager (email)
Rob Adams, Indian Health Services (email)

NPDES Wastewater Lagoon Inspection Report

National Database Information	
Inspection Date: July 19, 2023	Inspection Type: CEI
Entry/Exit Time: 11:00/11:30	NPDES ID Number: MTU000031
NAICS Code: 221300 Sewage Treatment Facility	Inspection ID: 202307_MTU000031
Lead inspector and affiliation: Lisa-kay Prideaux / EPA Region 8 Montana Operations Office	

Facility Location Information	
Site/Facility Name & Location: Fort Belknap Mission Lagoons 47.979247°N; -108.689604°W	Email Report to: Kasey Hastheeagle Director of Prairie Mountain Utilities Kasey.hastheeagle@ftbelknap.org

Contact Information	
	Name(s)/Title
Facility Contacts:	Kasey Hastheeagle – Director of Prairie Mountain Utilities (present)
	Gene Talks Different – Water Plant Manager (present)
	Tyus Hammett – Water/Wastewater Operator in Training (present)
Person/Company meeting definition of “Operator”	Jeffrey Stiffarm – President (not present)
Authorized Official(s)	Kasey Hastheeagle – Director of Prairie Mountain Utilities (present)
Tribe Representative(s)	
Indian Health Service Representative(s)	Rob Adams – Indian Health Services, Engineer (present)

Permit Information		
Is the permit on site and available? N/A	Lagoon Category: N/A	Monitoring Frequency: N/A
Effective Date: Unpermitted	Expiration Date: Unpermitted	Is the Facility under a compliance schedule? No
Is correct contact information indicated on ICIS? No	Indicate correct contact information: Authorized Official: Kasey Hastheeagle	
Receiving Water(s): No Discharge		
Discharge point location (longitude, latitude): No Discharge		
Regulatory Inspector’s source of information: Clean Water Act regulation, Integrated Compliance Information System (ICIS), Enforcement & Compliance History Online (ECHO), previous inspection report and correspondence, facility representatives and facility observations.		

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: Lisa-kay Prideaux	Date	Address/Phone Number
 Digitally signed by Prideaux, LisaKay Date: 2023.08.24 12:59:06 -06'00'	08.15.2023	U.S. EPA Region 8, Montana Operations Office 10 West 15 th Street, Suite 3200 Helena, Montana 59626 406-457-5022
Management Signature/Name	Date	Address/Phone Number
 Digitally signed by EMILIO LLAMOZAS Date: 2023.08.24 15:20:09 -06'00'	08/23/2023	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202 303-312-6407
Emilio Llamozas, NPDES and Wetlands Enforcement Section Supervisor		

Inspection Narrative and Site Description

On Wednesday July 18, 2023, at approximately 14:30, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux arrived at the Fort Belknap Water Treatment Plant located at 164 Agency Main Street in Harlem, Montana. After arriving, I presented my inspector credentials to the following representatives from Prairie Mountain Utilities: Kasey Hastheeagle, Director, Gene Talks Different, Water Treatment Plant Manager, and Tyus Hamnett, Operator in Training, James Labbull, Wastewater Operator, and Zeke Kackson, summer intern. During this time, we had a conversation regarding the overall state of the Tribal offices, Tribal utilities, complaints, problem areas within the Reservation facilities, future growth and upgrades, capacity of current systems, equipment needs and funding.

On July 19, 2023, I conducted an announced onsite inspection of the Mission Wastewater Lagoons (facility), owned by the Gros Ventre and Assiniboine Tribes of the Fort Belknap Reservation, and operated by Prairie Mountain Utilities. The inspection was conducted to evaluate the facility's discharge status and compliance with the Clean Water Act and EPA regulations. The EPA directly implements the Clean Water Act and NPDES program in Indian Country within the State of Montana. The inspection was announced several weeks prior to the inspection to coordinate logistics and ensure a facility representative would be on site. I presented credentials to Rob Adams of the Indian Health Services, who joined the inspection. I held an opening conference to explain the purpose of the inspection. I then proceeded to ask questions of to help me evaluate the facility's discharge status, and to obtain facility information for NPDES permit coverage evaluation. Throughout the inspection, I noted my observations in a field notebook. Photographs taken during the inspection are included in the attached photo log.

Mission Lagoons wastewater treatment facility was originally constructed in 1981 as a 2-cell lagoon system. The facility serves a population of approximately 20 homes, and processes domestic waste only. The facility consists of a collection system and two bentonite floor-lined cells. The cells operate in series by gravity with no pumps for aeration or flow. Lagoon cell one is approximately 3.18-acres to include a sub-cell area of approximately 1-acre. The sub-cell area is an approximate 2-foot berm located approximately 120-feet from the southern berm of cell 1 and stretching from west to east. Lagoon cell two is approximately 1.28-acres, located to the west of cell 1. Wastewater from collection system enters cell one in the southeast corner and into the center of the sub-cell area, wastewater would flow to cell two in the center of the adjoining dike walls. There is not a constructed discharge pipe. Sludge removal has not occurred in this lagoon system.



The site visit included walking around lagoon cell 1 (photos 757, 759 and 760), cell 2 (photos 758 and 759) I observed cattail and vegetated shrub growth within the sub-cell area of cell 1; I observed grasses in excess of 6-inches tall surrounding the cells and within each cell. I also observed rodent holes throughout the dike walls and within the small berm creating the sub-cell area of cell 1. South of the lagoon cells is Little Peoples Creek; however, it was dry and no discharge pipe observed.

Findings, Corrective Actions and Recommendations

Finding #1: Unmaintained vegetation within lagoon cells.

Specifically, the facility's lagoon dike walls were covered in unmaintained vegetation. Excessive vegetation/grasses around and within the cells (photos 757-760), shrub growth within the sub-cell area of cell 1 (photos 757 and 760), and woody vegetation starting to take root with in cell 2 (photo 758). When vegetation is unmaintained, it is difficult to assess the health of the lagoon dike walls for erosion, leaks, slumps, and burrowing animal damage.

Permit requirements:

40 CFR § 122.41(e) requires, at all times, the proper operation and maintenance of all facilities and systems of treatment and control (and related appurtenances) which are installed or used.

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

materials is titled ‘Principles of Design and Operations of Wastewater Treatment Pond Systems for Plant Operators, Engineers, and Managers’ (August 2011, EOA/600/R-11/088).

Part 9.4.2.3 of this guidance manual indicates the following:

- To maintain wave action, a pond should be free of weeds in the water or tall weeds on the banks.
- Dikes should be well seeded with grasses above the water line. Grass should be mowed regularly to prevent soil erosion and insect problems.

Recommended Corrective Action:

EPA recommends the vegetation in and around the lagoon cells be reduced and maintained below 6-inches in height such that the berms can be inspected for leakage, animal burrows, and erosion. Proper vegetation height also allows for the wind to naturally generate wave action to mix and aerate the lagoon contents for effective treatment of the wastewater. Increased wind action on the lagoon surface also increases evaporation as well as reduces the likelihood of mosquito breeding. Absence of good wave action may create anaerobic conditions.

Finding #2: Rodent damage within lagoon cells.

Specifically, damage from rodents was observed in and around both lagoon cells as holes (photo 759); rodents were observed as well. It is important to protect lagoon dike walls from destruction by waves, weather, and burrowing animals. Rodents will dig partially submerged tunnels and can cause damage to dikes which could destabilize and promote erosion, low water levels indicating leaking, or wall breaches. Removing woody materials as a food source will also deter the inhabitant tendency.

Regulation Requirements

40 CFR § 122.41(e) requires, at all times, the proper operation and maintenance of all facilities and systems of treatment and control (and related appurtenances) which are installed or used.

Recommended Corrective Action:

EPA recommends removing all heavy thick woody vegetation and cattails growing within the lagoon cells, as this can be a food source for rodents. Remove rodents and repair all damages to the dike walls.