



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jody Perez
Salish Kootenai Housing Authority
P.O. Box 38
Pablo, MT 59855

Re: Inspection report for Salish Kootenai Housing Authority/St. Ignatius Southside Wastewater Treatment facility, NPDES permit #MT0029017

Dear Ms. Davis,

Thank you for your time during the EPA's inspection of the St. Ignatius Southside wastewater Treatment Facility (WWTF) on June 15, 2022. The purpose of EPA inspection was to evaluate compliance with the Facility's National Pollutant Discharge Elimination System (NPDES) wastewater treatment permit, Permit No. MT002917 (the Permit).

Inspection findings are listed in the enclosed table titled "Summary of Findings." Within **thirty (30) days** of receipt of this report, please provide CSKT, and 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. This summary should be sent to:

Evan Smith
The Confederated Salish and Kootenai
Tribes of the Flathead Indian Reservation
Evan.smith@cskt.org

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

Please contact Evan Smith at 406- 883-2888 Ext. 7203 or by email at evan.smith@cskt.org 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
11:59:33 -06'00'

Enclosures:

- 1) NPDES Inspection Report
- 2) Photo Log

cc:

The Honorable Tom McDonald, Chairman, CSKT (email)

Wilhelmina Keenan, Environmental Director, CSKT (email)

Evan Smith, Water Quality Regulatory Specialist, CSKT (email)

Raquel "Rocki" Davis, Salish Kootenai Housing Authority (email)

NPDES– Municipal Wastewater

National Database Information	
Inspection Date: June 15, 2022	Inspection Type: Compliance Evaluation Inspection
Entry/Exit Time: 10:13-12:00 (site review) 12:45-1:30 (records review and closing conference)	NPDES ID Number: MT0029017
NAICS Code: 221320	Inspection ID: 202206-MT0029017
Lead inspector and affiliation: Evan Smith – The Confederated Salish and Kootenai Tribes of the Flathead Reservation.	
Inspector and affiliation: Lisa-kay Prideaux – U.S. EPA Montana Operations Office	

Facility Location Information <i>(Name/Location/ Mailing Address)</i>	
Site/Facility Name & Location: St. Ignatius Southside Wastewater Treatment Facility Salish and Kootenai Housing Authority Flathead Reservation, St. Ignatius. Montana 47.318149° N, -114.109138° W	Mail Report to: Jody Perez Salish and Kootenai Housing Authority 53243 US Hwy 93 P.O. Box 38 Pablo Pablo, Montana 59855

Contact Information	
	Name(s)/Title
Facility Contacts:	Bud Gilling / Water and Sewer Operations Manager, Salish and Kootenai Housing Authority (present)
	Raquel (Rocki) Davis, Community Systems Program Manager, Salish and Kootenai Housing Authority (present for records review and closing conference only)
	David Marmon, Construction Inspector, Salish and Kootenai Housing Authority (present)
	Albert Plant, Facility Operator, Salish and Kootenai Housing Authority (present)
	Doran Dumont, Facility Operator, Salish and Kootenai Housing Authority (present)
Person/Company meeting definition of “Operator”	Salish and Kootenai Housing Authority
Authorized Official(s)	Jody Perez / Salish and Kootenai Housing Authority

Permit Information	
Is the permit on site and available? No	Date NOI Submitted: November 25, 2014
Effective Date: December 1, 2018	Expiration Date: November 30, 2023
Receiving Water(s): Unnamed tributary of Sabine Creek	
If applicable, is waiver certification & approval on file? N/A	

Regulatory Inspector's source of information: EPA Records, The Confederated Salish and Kootenai Tribes of the Flathead Reservation, facility personnel, and site review.

Areas Evaluated During Inspection

<u>Permit</u>	<u>Effluent/Receiving Waters</u>	<i>Compliance Schedule</i>
<u>Records/Reports</u>	<u>Flow Measurement</u>	<i>Pollution Prevention</i>
<u>Facility Site Review</u>	<u>Self-Monitoring Program</u>	<i>Laboratory</i>
<u>Other(s):</u>		

Report Review and Signature

Drafter Name	Address/Phone Number	Date
Evan R. Smith	Water Quality Regulatory Specialist The confederated Salish and Kootenai Tribes of the Flathead Reservation 301 Main St. Polson, Montana. 59860	8/1/22
Evan R. Smith	406-883-2888 Ext.7203	
Reviewer Name/Signature	Address/Phone Number	Date
Prideaux Digitally signed by Prideaux, LisaKay Date: 2022.08.11 12:01:31 -06'00'	U.S. EPA Region 8 Montana Office 10 West 15th Street, Suite 3200 Helena, Montana 59626 406-457-5022	08.03.2022
, LisaKay		
Management Signature/Name	Address/Phone Number	Date
Boeglin, Digitally signed by Boeglin, Michael Date: 2022.08.11 11:42:57 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NP Denver, Colorado 80202	08/11/2022
Michael	303-312-6250	
Michael Boeglin		

Inspection Narrative and Site Description

On Wednesday June 15, 2022, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux and Evan Smith, representing the Confederated Salish and Kootenai Tribes Division of Environmental Protection conducted an onsite inspection of the St. Ignatius Southside wastewater treatment facility (Facility), located within the Flathead Reservation and operated by the Salish and Kootenai Housing Authority (SKHA) to evaluate compliance with the facility's National Pollutant Discharge Elimination System (NPDES) wastewater treatment permit, MT0029017. Those present for the inspection from SKHA included: Bud Gilling, Bret Birk, Albert Plant, David Moran, and Doran Dumont.

The inspection commenced at approximately 10:30 am, when the group convened at the Facility. The inspection was announced several weeks prior to the inspection. To start the inspection the EPA inspector Lisa-kay showed her credentials and discussed the purpose of the inspection. The SKHA work crew and the inspectors began the inspection with the Municipal Wastewater Checklist. The SKHA did not have the NPDES permit on site, nor did they have the permit fact sheet. After the checklist was completed the SKHA operators gave the inspectors an overview of the Facility's wastewater operations, Operation and Maintenance Program, Monitoring procedures, lift station, collection system, and active and planned projects within the collection system and at the Facility. Construction of the plant was completed in early 2019. The previous plant was a two-cell, aerated lagoon system, which will only be used in the future as a back-up treatment system.

The Facility serves approximately 114 connections between commercial and residential and has a design capacity of about 75,000 gallons per day. The Facility has only one lift station that was constructed as a part of the new bed biofilm reactor package plant (MBBR) and is located just outside of the building that houses the new plant. The Facility's collection system consists of 2/3 PVC and 1/3 clay piping. SKHA operators clean portions of the collection system on an as-needed basis, based on the reports and observations of the clogs, backups, or low flow.

Following the conversation, the SKHA crew proceeded with the site review portion of the inspection. Throughout the inspection, the inspectors noted their observations in the Municipal Wastewater Checklist. Photographs were taken during the inspection and are attached as the photo log. The site review began with the Facility's collection system intake chamber, and then proceeded to the lift station, the MBBR building, sludge holding tank, ultraviolet disinfection unit, outflow, and the two lagoon cells. Inspectors were informed that Smith Septic Company discharges sludge directly into lagoon cell one.

The MBBR was installed to assist the Facility in meeting effluent limits for biochemical oxygen demand, total suspended solids, and ammonia. Wastewater enters the MBBR plant through an influent bar screen (photo 1), then to a holding tank outside (photo 2), then to a grease filter (photo 3), then into an aerated equalization tank with diffusers (photo 4). Next, the wastewater enters the reactor basin, which housed a rotating biological contactor, or Bio-Rotor, which consists of rotating cylinder-shaped wheel with biofilm processes for biological treatment (photo 5). From the Bio-Rotor process, wastewater enters the secondary clarifier (photo 6). Return activated sludge from the secondary clarifier is directed to the reactor basin, and waste activated sludge is directed to the aerobic digester. Decant from the digester is pumped back to the equalization tank (photo 7). Wastewater flows from the secondary clarifier to the ultraviolet disinfection unit (photo 8). Next, the outfall (photo 9), where treated wastewater flows westerly along an un-named ephemeral tributary to Sabine Creek, approximately one-half mile from the Facility. The last of the site review portion was the two lagoon

back-up cells, with observing cell one first (photo 10), then cell two (photo 11).

During the closing conference, Evan Smith reviewed discharge monitoring reports (DMRs) for 2022 monitoring periods, using the Municipal Wastewater check list with Rocki Davis as part of a recordkeeping evaluation. The inspectors recapped the inspection and presented preliminary findings. EPA inspector Lisa-kay discussed helping Rocki Davis with using the correct equations for data entry. Inspector Evan Smith went over the sampling data from 11/01/21 to 5/31/22. Findings identified pursuant to the inspection are discussed in the Findings, Corrective Actions, and Recommendations section, below.

Findings, Corrective Actions and Recommendations

Finding #1: The Facility incorrectly calculated the geometric means for E.coli

During EPA's records review of DMRs, with chain-of-custodies and laboratory analytical reports, the EPA inspectors noted the Facility incorrectly calculated the required "geometric mean" and instead reported the "arithmetic mean" for E. coli sample results. Geometric mean is defined as the n^{th} root of the product of 'n' numbers.

Permit requirement:

Part 1.3.1. Of the Permit sets forth E. coli effluent limitations for the Facility. Part 1.1 states geometric mean shall be calculated for microbiological organism for the 7-day and 30-day averages.

Corrective Action:

Calculate the geometric mean for E. coli sample results during all monitoring periods and revise the DMRs in NetDMR to reflect these changes for 2022. In accordance with Part 2.7 of the Permit, ensure that any calculations required for the completion of the Facility's DMRs are maintained within the monitoring files and retained for at least 3 years.

Finding #2: Current Copy of permit was not on site

A copy of the Facility's NPDES permit was not present on site during the inspection.

Permit requirement:

Permit requires a copy of the permit be on site at all times, stated in the permit part 2.7.

Corrective Action:

Make a copy of the permit to be on site. Current permits and associated statement of basis can be found on EPA's website at <https://www.epa.gov/npdes-permits/montana-npdes-permits>. In your response to CSKT and EPA, describe how you have addressed this finding.

Finding #3: Effluent limit exceedances.

The facility had the following effluent limitation excursions on the occasions listed in the table below:

Violations Report for MT0029017: 01/01 2022 – 05/31/2022						
Parameter	Monitoring Period End Date	Permit Limit	Units	Limit Type	Value reported	Percent exceedance
TSS	04/30/2022*	85	%	% Removal	77	53%
E. coli Bacteria	02/28/2022*	252	CFU/100ml	Weekly Max	517	105%
Nitrogen, Ammonia total (as N)	01.31.2022*	2.99	mg/L	30Day AVG	12.1	305%
		3.83	Mg/L	Daily Max	12.1	216%
* Results in significant noncompliance (SNC) (An exceedance is SNC when the numeric effluent limit violation is in excess of 40% or greater for Group I Pollutants or an exceedance of 20% or greater for Group II Pollutants. Group I and II Pollutants are defined in 40 CFR 123.45)						
Abbreviations:						
- TSS: total suspended solids E. coli: <i>Escherichia coli</i>						

Permit requirements:

Part 1.3.1 of the Permit sets forth effluent limitations for the Facility.

Corrective Action:

Ensure the Facility is being operated and maintained in such a manner to meet effluent limitations. In a response to CSKT and EPA, provide an explanation on what SKHA has done to meet effluent limitations, and how it will meet the effluent limitations in the future.



Photographs for St. Ignatius Southside WWTF

Inspection Type: NPDES-Wastewater Treatment

Photo number 1 taken by Evan Smith on 06/15/2022.

Description:

Influent with manual bar screen.



Photo number 2 taken by Evan Smith on 06/15/2022.

Description:

Manhole to access influent holding tank





Photographs for St. Ignatius Southside WWTF

Inspection Type: NPDES-Wastewater Treatment

Photo number 3 taken by Evan Smith on 06/15/2022.

Description:

Lift station on-site with float system and alarms.



Photo number 4 taken by Evan Smith on 06/15/2022.

Description:

Aerated equalization tank





Photographs for St. Ignatius Southside WWTF

Inspection Type: NPDES-Wastewater Treatment

Photo number 5 taken by Evan Smith on 06/15/2022.

Description:

Bio-Rotor. Rotating wheel with biofilm for biological treatment.



Photo number 6 taken by Evan Smith on 06/15/2022.

Description:

Secondary clarifier.





Photographs for St. Ignatius Southside WWTF

Inspection Type: NPDES-Wastewater Treatment

Photo number 7 taken by Evan Smith on 06/15/2022.

Description:

Digester.



Photo number 8 taken by Evan Smith on 06/15/2022.

Description:

Ultraviolet disinfection system.





Photographs for St. Ignatius Southside WWTF

Inspection Type: NPDES-Wastewater Treatment

Photo number 9 taken by Evan Smith on 06/15/2022.

Description:

Manhole with outfall pipe. This is the location of sample collection.



Photo number 10 taken by Evan Smith on 06/15/2022.

The direction of the photo is Northwest.

Description:

Lagoon cell 1. This was part of the old treatment system, no longer used except for an emergency use.





Photographs for St. Ignatius Southside WWTF

Inspection Type: NPDES-Wastewater Treatment

Photo number 11 taken by Evan Smith on 06/15/2022.

The direction of the photo is Northwest.

Description:

Lagoon cell 2. This was part of the old treatment system, no longer used except for an emergency use. Pipe is the old inlet pipe.

