U.S. EPA Region 8 NPDES Inspection Report

National Database Information	
Inspection Date: **June 5, 2025**	Inspection Type: **Compliance Evaluation Inspection**
Entry / Exit Time: **1:30 PM – 2:40 PM**	NPDES ID: **SDG589518 (EPA Region 8 Lagoon General Permit SDG589###)**
Major / Non-Major Facility: **Non-Major**	Program Sector(s): **Publicly Owned Treatment Works (POTW)**
NAICS Code: **221320 (Sewage Treatment Facilities)**	Inspection ID: **202506_SDG589518**
Lead inspector and affiliation: [redacted] **/ U.S. EPA Region 8**	
Inspector and affiliation: [redacted] **/ U.S. EPA Region 8**	

Facility Location Information	
Site/Facility Name & Location: **Rockyford School** **14 BIA 33** **Porcupine, SD 57772**	Email Report to: [redacted] **– Facilities/Maintenance Director** [redacted] **– Facility Manager** **Rockyford School** [redacted]

Contact Information	
	Name(s)/Title
Facility Contacts	[redacted] **/ Facilities/Maintenance Director / Rockyford School (present for entire inspection)**
	[redacted] **/ Facility Manager / Rockyford School (present for entire inspection)**
	[redacted] **/ Maintenance / Rockyford School (present for entire inspection)**
	[redacted] **/ Maintenance / Rockyford School (present for the entire inspection)**
	[redacted] **/ Maintenance / Rockyford School (present for the entire inspection)**
	[redacted] **/ Maintenance / Rockyford School (present for the second part of the site walk-through and the closing conference)**
Indian Health Service Contacts	[redacted] **/ Tribal Utility Consultant / Indian Health Service (present for the entire inspection)**
	[redacted] **/ Sanitarian / Indian Health Service (present for the entire inspection)**

Person/Company meeting definition of “Owner”	**Oglala Lakota County School District 65-1**
Person/Company meeting definition of “Operator”	**Maintenance Crew / Rockyford School**
Responsible Official(s)	[redacted] **/ Facilities/Maintenance Director**

Permit / Facility Information	
Permit on site and available: **Yes**	Permit Application Date: **Did not evaluate**
Effective Date: **October 1, 2022**	Expiration Date: **March 31, 2027**
Latitude: **43.481195**	Longitude: **-102.487014**
Receiving Water(s): **Non-discharging, but any discharge would flow into field with an unnamed tributary of Porcupine Creek located 0.75 miles from Cell 4.**	
Weather Conditions: **Overcast with precipitation**	
Inspector’s source of information: **Facility representatives and records, EPA records and databases, Google Maps, and inspection observations.**	

Areas Evaluated During Inspection		
Permit	**Self-Monitoring Program**	Pretreatment
Records	Compliance Schedule	Pollution Prevention
Facility Site Review	Laboratory	Stormwater
Effluent/Receiving Waters	**Operations and Maintenance**	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow

Report Review and Signature		
Drafter Name	Draft Date	Contact Information
	6/25/2025	**U.S. EPA Region 8** **Denver, Colorado** [redacted]
Reviewer Name	Review Date	Contact Information
[redacted]	**7/3/2025**	**U.S. EPA Region 8** **Denver, Colorado** [redacted]
Management Reviewer Name/Signature/Date		Contact Information
		U.S. EPA Region 8 **Denver, Colorado** [redacted]
[redacted]**, NPDES and Wetlands Enforcement Section Supervisor**		

Inspection Narrative and Facility Description

1.0 Introduction

On Thursday, June 5, 2025, U.S. Environmental Protection Agency (EPA) inspectors [redacted] and [redacted] (collectively, "inspectors"), conducted a compliance evaluation inspection of the Rockyford Wastewater Treatment Facility (WWTF; Facility; lagoon), located in Porcupine, South Dakota, within the boundaries of the Pine Ridge Reservation (Reservation). The inspectors were accompanied by [redacted], Tribal Utility Consultant with Indian Health Service (IHS), and [redacted], Sanitarian with IHS.

The inspection was coordinated with Rockyford School and the Oglala Sioux Tribe Environmental Director, a few weeks in advance, and an inspection notification letter was sent to the Oglala Sioux Tribe on May 1, 2025. The purpose of the inspection was to evaluate compliance with applicable National Pollutant Discharge Elimination System (NPDES) and Clean Water Act (CWA) requirements. Throughout the inspection, observations were noted in bound checklists. Photographs taken during the inspection are included in the attached photo log.

2.0 Background

At the time of the inspection, the facility was permitted under the "No Discharge Requirement" (NODIS) conditions of the 2022-2027 EPA Region 8 Lagoon General Permit SDG589### (General Permit). The facility was assigned facility-specific NPDES ID SDG589518.

Records pertaining to previous EPA NPDES inspections and other NPDES permitting, and compliance records are maintained in the EPA files.

3.0 Inspection Narrative

The inspection began when inspectors arrived at the Rockyford School in Porcupine at approximately 1:30 PM. Inspectors and IHS representatives convened with [redacted] (collectively "facility representatives" or "representatives") in a conference room at the school and presented inspector credentials (halfway through the site walk-through [redacted] joined the group as well).

During the opening conference, the facility representatives stated that the WWTF is owned by the Oglala Lakota County School District 65-1 and operated by the four members of the maintenance crew listed on page 1. [redacted] work on the administrative side while the maintenance crew is responsible for the operation and maintenance (O&M) and on-site activities of the lagoon. Facility representatives stated that the four members of the maintenance crew are in the process of getting their wastewater operator certification; they have completed the class and are studying for the exam.

The Rockyford School WWTF serves the school which operates year-round with approximately 400 students. The number of students fluctuates depending on the season. In addition, there is approximately 50 staff members, some of whom are living in houses located on the school property. The Facility is permitted as a no discharge facility under the General Permit. Any discharge from the Facility is expected to be under emergency circumstances only.

Inspection Narrative and Facility Description

The lagoon system was originally constructed in 1986 according to the NOI. The lagoon is comprised of a four-cell non-discharging system, with no outfall structure, and one lift station. Over the last year, facility representatives stated that the school expanded its faculty housing with the addition of four new homes.

The lagoon primarily receives domestic wastewater from the school and faculty housing via a lift station that pumps the wastewater to an influent manhole, which then feeds into a gravity-flow collection system. The cafeteria within the school has a grease trap installed prior to discharge into the collection system. After the opening conference, inspectors observed the lift station which was comprised of a submersible system with a single well (the wet well).

The lift station is located on the northeast side of the school and is surrounded by a 4' chain link fence with signage. During the site walk-through, inspectors observed portions of the lift station fencing were downed and damaged (photo 1). The lift station contains submersible pumps located in the wet well, and a control panel equipped with pump hours and a Supervisory Control and Data Acquisition (SCADA) system (photos 2-4). At the time of the inspection, both pumps appeared to be functioning properly, as evidenced by the similar pump hours recorded for each pump (photo 3).

After viewing the lift station, the inspectors walked the perimeter of the WWTF. The lagoon is surrounded by a 4' barbed wire fence, with a locked gate and signage at the entrance (photo 5). Inspectors observed all portions of the fence and gate intact. Wastewater from the lift station is pumped to an influent manhole on the northeast corner of Cell 1 (photo 8). Adjacent to the main influent manhole is another manhole, which facility representatives indicated is no longer in use; no wastewater was observed flowing through it (photo 7). The current influent manhole does not contain a splitter, resulting in wastewater flowing sequentially from one cell to the next, with no bypass potential.

During the site walk-through, inspectors observed approximately one third of Cell 1 filled with wastewater, and no wastewater present in Cells 2, 3, and 4 (photos 6, 10, 13, and 14). Facility representatives indicated that over the past year, Cell 1 has consistently had enough wastewater to transfer into Cell 2 via the piping system (photo 12). However, during the inspection, inspectors noted that Cell 1 contained only a few feet of wastewater, which representatives attributed to the school being out for the summer. Additionally, inspectors observed biosolids accumulated around the influent pipe entering Cell 1 (photo 9).

While inspecting the cells, facility representatives were unable to locate certain sections of transfer piping. Specifically, the outlet pipe located within Cell 2 that transfers wastewater from Cell 2 to Cell 3 could not be identified. Additionally, upon examining the transfer piping manhole between Cells 3 and 4, inspectors noted significant debris and sediment accumulation, and the transfer piping from Cell 3 was not visible (photo 15).

In terms of maintenance, facility representatives stated that the maintenance crew inspects the WWTF once per week and fills out an inspection log with all the required components from the Permit. Mowing around the lagoon occurs on a monthly basis, and the lift station is pumped out on a yearly basis by [redacted], a third-party company. The representatives indicated that there are currently

Inspection Narrative and Facility Description
no operation and maintenance (O&M) logs maintained for repairs performed on the lagoon; however, manifests for the lift station pump-outs are kept. Finances were briefly discussed during the opening conference. The facility representatives stated that their budget comes from a combination of grants, federal funding, and state funding. They also affirmed that they have sufficient personnel and financial resources to successfully operate and maintain the WWTF in accordance with permit requirements. **4.0 Closing Conference and Post-Inspection Activities** Following the site walk-through, the inspectors, IHS representatives, and the facility representatives returned to the school to hold a closing conference. The EPA inspectors shared their preliminary observations and outlined the report timeline and next steps for the Facility to respond to the inspection findings. The inspection concluded at 2:40 PM when inspectors and IHS representatives left the site. On June 9, 2025, the EPA inspectors sent an email to [redacted], containing preliminary findings and recommendations, as well as the following resources: templates for logging operation and maintenance, and an operations and maintenance manual template that can be modified to be specific to Rockyford School WWTF. Findings, requested corrective actions, and recommendations identified pursuant to this inspection are included in the section below.

Findings, Corrective Actions, and Recommendations
<u>Finding #1: O&M manuals and logs had not been developed or implemented by the facility.</u> The permittee did not have O&M manuals for operating the WWTF and were not tracking and logging any maintenance activities. The EPA provided a template O&M manual and a template O&M log that can be adapted for the Rockyford School WWTF. **Permit Requirement:** Part 6.6 of the Permit (Proper Operation and Maintenance) 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 includes 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 this Permit. The Permittee shall do the following as part of the operation and maintenance program for the wastewater treatment facility:

Findings, Corrective Actions, and Recommendations
6.6.1. For Permittees not previously covered under the Region 8 General Permit for Wastewater Lagoon Systems in Indian Country, the Permittee shall, as soon as reasonable and practicable, but no later than six (6) months after the effective date of this Permit, do the following as part of the operation and maintenance program for the wastewater treatment facility: 6.6.1.1. Have a current O & M Manual(s) that describes the proper operational procedures and maintenance requirements of the wastewater treatment facility; 6.6.1.2. Have the O & M Manual(s) readily available to the operator of the wastewater treatment facility and require that the operator become familiar with the manual(s) and any updates; 6.6.1.3. Have a schedule(s) for routine operation and maintenance activities at the wastewater treatment facility; and, 6.6.1.4. Require the operator to perform the routine operation and maintenance requirements in accordance with the schedule(s). In addition to the operation and maintenance items in the manual for the lagoon system, ALL Permittees shall do the following maintenance, at a minimum: The Permittee shall maintain a log in either paper (e.g. bound notebook) or electronic format containing a summary record of any daily operation and maintenance activities at the wastewater treatment lagoon facility and collection system, that is to be updated on each day operation and maintenance activities are performed. At a minimum, the log shall include the following information: 6.6.1.5. Date and time; 6.6.1.6. Name and title of person(s) making the log entry; 6.6.1.7. Name of the persons(s) performing the activity; 6.6.1.8. A brief description of any operations and maintenance activity performed on the wastewater treatment lagoon system; 6.6.1.9. The Permittee shall ensure that necessary action to promptly correct the problem of leakage through the dikes is taken and documented in the maintenance log; 6.6.1.10. The Permittee shall ensure that necessary action to promptly remove burrowing animals from the dikes is taken and documented in the maintenance log; 6.6.1.11. The Permittee shall ensure prompt repair of damage to dikes caused by burrowing animals and/or erosion and documentation of all actions in the maintenance log; 6.6.1.12. The Permittee shall ensure removal of rooted plants, including weeds and trees, from the water on a regular basis or as needed and documentation of all actions in the maintenance log; and 6.6.1.13. The Permittee shall ensure that the dikes are kept mowed on a regular basis during the growing season or as needed (i.e., vegetation not greater than 6” tall or any height that may interfere with monitoring, operation and maintenance of the system) and that documentation of all actions taken are recorded in the maintenance log. 6.6.1.14. Other information, as appropriate. The Permittee shall maintain the daily log in accordance with proper record-keeping procedures and shall make the log available for inspection, upon request, by authorized representatives of the U.S. Environmental Protection Agency or the applicable Tribe(s) (see Appendix A for list of Tribes).”

Findings, Corrective Actions, and Recommendations
Corrective Action #1: Develop and implement an O&M Manual prepared in accordance with Part 6.6 of the Permit. In a response, provide a copy of the O&M Manual to the EPA and the Oglala Sioux Tribe Environmental Program. **Corrective Action #2:** Maintain maintenance logs in accordance with the recordkeeping requirements of the permit. Provide the EPA and the Oglala Sioux Tribe Environmental Program with a description of the corrective actions taken to address this finding, as well as relevant O&M documents from section 6.6.1.5 through 6.6.1.14.
Finding #2: Incomplete Information in the current Notice of Intent (NOI). The current NOI submitted on July 7, 2022, is incomplete. It is missing essential information regarding the lift station. Facility representatives stated that the lift station was upgraded approximately five years prior to this inspection. **Permit Requirement:** **Part 2.1 of the permit (Obtaining Authorization for Coverage Under this Permit) states:** "Submit a **complete and accurate NOI** using an EPA notice of intent form for coverage under this Permit. The "NPDES 2020 Lagoon General Permit Notice of Intent Form" is located electronically at: https://www.epa.gov/npdes-permits/region-8-npdes-lagoon-general-permit. Facilities may also contact EPA's Region 8 Office (EPA contact information is available at the website provided in the following paragraph) and request a hardcopy NOI be mailed to them. Once completed, the form can be submitted to EPA as indicated in Section 2.4 of this Permit. The "NPDES 2020 Lagoon General Permit Notice of Intent Form" can also be requested from EPA's Region 8 Office. Contacts for Region 8 are listed at the following website: https://www.epa.gov/npdes-permits/forms/contact-us-about-npdes-permits-aroundnation#tab-r8 40 CFR 122.28(b)(2)(i) states, "As of December 21, 2025 or an EPA-approved alternative date (see 40 CFR 127.24(e) or (f)), all [NOIs]" for general permits must be submitted electronically. EPA R8 plans to provide instructions for electronic NOI submittal on the website above for any NOIs submitted on or after December 21, 2025, unless this timeframe is replaced with another EPA-approved alternative date." **Corrective Action:** Contact [redacted] with the permitting group [redacted] to submit the necessary updates to the current NOI, including details regarding all lift station. Ensure that this change is clearly communicated and complies with all regulatory requirements. In your response to

Findings, Corrective Actions, and Recommendations
the EPA and the Oglala Sioux Tribe Environmental Department, provide documentation of the communication with the permitting group, along with a narrative explaining the updates made and the date of notification.
Finding #3: Rooted plants were growing in Cell 1 (photos 6 and 9). Rooted plants greater than 6 inches were growing in Cell 1. **Permit Requirements:** Part 6.6.1.12 of the Permit (Proper Operation and Maintenance) states: The Permittee shall ensure removal of rooted plants, including weeds and trees, from the water on a regular basis or as needed and documentation of all actions in the maintenance log. **Corrective Action:** Remove rooted vegetation from the inside of Cell 1. In a response to the EPA and the Oglala Sioux Tribe Environmental Program, provide photographs of the cell indicating this corrective action has been complete, and provide the date of completion.
Finding #4: Facility representatives were unable to locate multiple transfer structures (photo 15). During the inspection, facility representatives were unable to locate the following structures: The outlet pipe that discharges from Cell 2 to Cell 3, and the transfer pipe between Cell 3 and Cell 4 in the transfer structure. **Permit Requirements:** Part 6.6 of the Permit (Proper Operation and Maintenance) 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 includes 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 this Permit.” **Corrective Action:** Locate and evaluate the operational status of the outlet pipe within Cell 2, that discharges to Cell 3. Additionally, clean out the transfer piping manhole between Cell 3 and Cell 4, and verify that the piping is present and operable. In a response to the EPA and the Oglala Sioux Tribe Environmental Program, provide a detailed narrative explaining the process and outcome of this evaluation.

Findings, Corrective Actions, and Recommendations

Finding #5: The lift station's perimeter fencing was downed and damaged in multiple areas, and the lift station was not equipped with a trash basket (photos 1 and 2).

The lift station's fencing was downed and damaged in multiple areas. Additionally, the lift station was not equipped with a trash basket in the wet well.

EPA Guidance:

EPA has developed guidance manuals on the proper operation and maintenance of lift stations. The guidance document is called "Collection Systems Technology Fact Sheet – Sewers, Lift Station" (August 2000, EPA/832/F-00-073).
https://nepis.epa.gov/Exe/ZyPDF.cgi/901U0X00.PDF?Dockey=901U0X00.PDF

The guidance manual states on page 1:
"Lift station equipment and systems are often installed in an enclosed structure."

The guidance manual states on page 3:
"Bar screens, [trash baskets], or grinders are often installed in or upstream of the wet-well to minimize pump clogging problems."

Part 6.6 of the Permit (Proper Operation and Maintenance) 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 includes 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 this Permit."

Recommendation #1:

Fix the perimeter fencing around the lift station to prevent potential injury and vandalism. These measures will increase security and help maintain the integrity of the lift station.

Recommendation #2:

Install a trash basket or equivalent device in the wet well of the lift station to capture items and debris flushed down the toilets. This preventative measure can help protect the pumps from damage and reduce the likelihood of backups.