

NPDES Tribal Wastewater Lagoon

National Database Information	
Inspection Date: November 16, 2023	Inspection Type: CEI-Unpermitted Lagoon
Entry/Exit Time: 13:00 – 14:30	NPDES ID Number: MTU000299
SIC Code: 22132–Sewage Treatment Facility	Inspection ID: 202311_MTU000299
Lead inspector and affiliation: Lisa-kay Prideaux, U.S. EPA Region 8, Montana Office	

Facility Location Information	
Site/Facility Name & Location: Kicking Horse Job Corps WWTF 33091 Mollman Pass Trail Flathead Reservation, Montana 47.477259°N, 114.063694°W	Email Report to: John Neiss, Facilities Maintenance Manager Confederated Salish and Kootenai Tribes John.neiss@cskt.org

Contact Information	
	Name(s)/Title
Facility Contacts:	John Neiss, Facilities & Maintenance Department Head (not present)
Tribal Representative(s):	Evan Smith, Water Quality Regulatory Specialist, Confederated Salish & Kootenai Tribes (present)
Person/Company meeting definition of “Operator”	Confederated Salish and Kootenai Tribes
Responsible Official(s)	N/A (Unpermitted facility)

Permit Information	
Is the permit on site and available? Unpermitted	Individual or General Permit: Unpermitted
Effective Date: Unpermitted	Expiration Date: Unpermitted
Latitude: 47.477259°N	Longitude: 114.063694°W
Receiving Water(s): No Discharge – Land Application	
Weather Conditions: Partly sunny, 30°F	
Regulatory Inspector’s source of information: Previous inspection report, field observations.	

Areas Evaluated During Inspection		
<i>Permit</i>	<i>Effluent/Receiving Waters</i>	<i>Compliance Schedule</i>
<i>Records/Reports</i>	<i>Flow Measurement</i>	<i>Pollution Prevention</i>
<u>Facility Site Review</u>	<i>Self-Monitoring Program</i>	<i>Laboratory</i>

Report Review and Signature		
Drafter	Address/Phone Number	Date
Prideaux, LisaKay Digitally signed by Prideaux, LisaKay Date: 2024.04.04 11:52:18 -06'00'	U.S. EPA Region 8, Montana Operations Office Prideaux.Lisakay@epa.gov 406-457-5022	04/02/2024
Reviewer Name	Address/Phone Number	Date
Akash Johnson	U.S. EPA Region 8 johnson.akash@epa.gov 303-312-6067	04/02/2024
Management Signature/Name	Address/Phone Number	Date
EMILIO LLAMOZA S Digitally signed by EMILIO LLAMOZAS Date: 2024.04.04 10:59:16 -06'00'	U.S. EPA Region 8 Llamozas.Emilio@epa.gov 303-312-6407	04/03/2024
Emilio Llamozas	303-312-6407	

Inspection Narrative and Site Description

On Thursday, November 16, 2023, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux, and the Water Quality Regulatory Specialist for the Confederated Salish Kootenai Tribes (CSKT), Evan Smith, conducted an announced inspection of the Kicking Horse Job Corps (KHJC) wastewater treatment lagoons (the facility), to evaluate compliance with the Clean Water Act and EPA regulations. The EPA notified the CSKT of the inspection in a letter sent September 14, 2023. The inspection commenced at approximately 13:00, when Lisa-kay and Evan arrived at the facility site. Since Evan is a Tribal member, permission was granted to EPA. Upon arriving at the site, Evan tried to contact John Neiss, the Facility & Maintenance Department Head; however, Mr. Neiss did not answer the phone. Throughout the inspection, observations and photograph descriptions were documented. All photographs taken during the inspection are included in the attached photo log and are maintained by EPA in accordance with the Quality Assurance Field Activities Procedure and Standard Operating Procedure.

According to the previous inspection report (2019), KHJC was constructed and operated as a vocational training facility since 1970. The grounds span several acres and contain approximately 30 structures featuring various types of vocational training and support facilities, including classrooms, maintenance shops, heavy equipment garages, laboratories, kitchens, cafeterias, medical facilities, fitness centers, recreational centers, showers, bathrooms, dormitories, and administration buildings. The collection system generally flows via gravity east to west, following area topography, except one toilet in one of the dormitories has a sump to pump into the system. The facility closed in 2018. The Job Corp's vocational school will not return to the site; however, the Tribal Natural Resources Department has been slowly repairing the site and moving into the buildings. Currently the site is approximately 40% occupied. In 2020, the facility completed a sludge removal project to de-sludge the three cells. The estimated biosolids volume removed was approximately 1300-1400 dry tons, which was land applied to the Moiese Valley Ranch located southwest in Moiese, Montana. Currently, the facility holds wastewater in the first two lagoon cells and is keeping the third cell off-line temporarily. The facility has installed the piping necessary to connect the two lagoons to the land application sprinkler system. During the sludge removal process, it was unclear if the third lagoon cell's bottom remained sealed. The facility performed soil testing and determined the lagoon's bentonite liner needed repairs prior to being put back on-line.

Evan and I proceeded to walk the lagoon treatment area. We did not walk around the KHJC grounds. The collection system gathers all waste stream into a pipe which crosses over the Kicking Horse Feeder Canal (photo 825) and enters the wastewater treatment system. The system consists of three facultative wastewater treatment lagoons which run in series. Cell 1 is the southeast cell (photos 823 and 824), cell 2 is to the northwest (photos 819 and 820), and cell 3, which is currently offline (photos 821 and 822), is located to the north of both cells 1 and 2. Observations noted include the thick vegetation within the lagoon walls of lagoon cells 1 and 2, and the wet soils and standing water in cell 3. Evan and I did not observe the land application area, nor Moiese Valley Ranch. The areas used for sludge dewatering observed, and no disturbance remains (no photos).

Evan and I left the site at approximately 14:30.



Kicking Horse Job Corps Wastewater Treatment Lagoons

Findings, Corrective Actions and Recommendations

Recommendation #1: The wastewater lagoon perimeter fence was not locked.

Specifically, the lagoon area was mostly fenced, however, a portion of the fencing was still down from the sludge removal project, and the gate was not locked.

Corrective Action:

EPA recommends erecting the downed fencing ensuring the lagoon perimeter fence is intact, and lock the entrance gate when not occupied by operators.

Recommendation #2: Unmaintained vegetation within lagoon cells.

Specifically, the facility's lagoon dike walls were covered in unmaintained vegetation as well as vegetation growing within the water line of the lagoon cells. Excessive vegetation growth was observed along the edges and growing within all three cells (photos 819 through 824).

Corrective Action:

EPA recommends the removal of vegetation growing within the lagoon cells. When vegetation is unmaintained, it is difficult to assess the health of the lagoon dike walls for erosion, leaks, slumps, and burrowing animal damage. Heavy thick roots from the wrong type of flora can compromise the integrity and greatly inhibit or degrade the dike walls as well as puncture liners creating leaking lagoons.