

**EPA REGION 10 Enforcement and Compliance Assurance
Division**

INSPECTION REPORT

Inspection Entry Date/Time	03/20/2023 1:00 PM (PT)	Announced: No	
Inspection Exit Date/Time	03/20/2023 3:15 PM (PT)	Access: Granted	
Weather	45°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	City of Juliaetta		
Facility Name	City of Juliaetta WWTP		
Facility Physical Address	1666 Id-3		
City, State, Zip Code	Juliaetta, Idaho 83535		
County	Latah		
Facility GPS Coordinates	46.562359, -116.71051		
Mailing Address	P.O. Box 229		
City, State, Zip Code	Juliaetta, Idaho 83535		
FRS ID	110010027005		
Permit Number	ID0023761		
SIC	4952 (Sewage Systems)		
Lead Inspector:			
Raymond Andrews	EPA REGION 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA REGION 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

Site Entry and Inspection Objectives

I arrived at the Juliaetta WWTP (the “Site” or “Facility”), located at 1666 Id-3, Juliaetta, Idaho, at 1:00 PM (PT) on 03/20/2023 for an unannounced inspection. I presented my inspector credentials to Justin Cope, the City of Juliaetta’s Public Works Supervisor. I informed Mr. Cope that I was an inspector from EPA Region 10’s Seattle office and I was at the facility to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # ID00237861. This report is based on information supplied by Mr. Cope, my direct observations, and records and reports maintained by the facility. In addition, information gathered from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
City of Juliaetta	Justin Cope	Public Works Supervisor	Yes	Yes

Facility/Site Information

What is the facility’s service population?	The facility has a service population of 595 citizens.
How many employees does the facility have?	The facility has one employee, Mr. Ryan Lindhorst, in addition to Mr. Cope.
Are the facility employees certified wastewater operators?	Mr. Cope holds a Level 2 Wastewater Treatment certification. Mr. Lindhorst was previously certified, but his certification lapsed, and he plans to retake the certification test later this year.
When is the facility staffed?	Per Mr. Cope, the facility is staffed 7:00am until 11:00am, Monday through Friday. On Saturday and Sunday, either Mr. Cope or Mr. Lindquist make at least one trip to the facility each day.
How many discharge points does the facility have?	The facility only has one discharge point.
Does the facility treat anything other than domestic sewage waste?	The facility does not treat anything other than domestic sewage.
What is the average daily flow?	0.025 MGD
What is the design flow of the facility?	0.08 MGD
How often does the facility discharge?	The facility is authorized to discharge 24-hours/day, year-round.

What water receives the facility's discharge?	The facility's receiving water is the Potlatch River.
Explain the facility's treatment process.	The influent gravity flows to the wastewater treatment facility. A lift station pumps the wastewater through a grit chamber at the headworks. The removed grit is collected in a grit bed. During the summer, the bed is cleaned out every two weeks. The bed cannot be cleaned out when frozen or excessively wet. From the grit chamber, the influent flows to the aeration basin, which is equipped with coarse bubble aeration, and then to the clarifier. Activated sludge is wasted from the bottom of the clarifier to drying beds, where liquid is returned to the treatment system. Once dry, the sludge is taken to a composting facility. The clarifier overflows to a rotating micro-screen to remove any fine solids. Following the micro-screen, the effluent is chlorinated with sodium hypochlorite in a chlorine contact chamber. The effluent is dechlorinated using calcium thiosulfate tablets as it passes over a v-notch weir. The effluent then flows to a settling pond which allows most of the water to infiltrate. Any excess water that does not infiltrate is discharged into the river.
Discuss sampling and analysis.	Mr. Cope collects grab samples for analysis. The facility conducts its own analysis for residual chlorine, TSS, BOD, E. coli, pH, temperature, and dissolved oxygen.
Who analyzes the other parameters?	Anatek Labs, Inc analyzes ammonia, total phosphorus, and nitrates and nitrites. In addition, Anatek Labs also conducts analysis of the samples from the required Surface Water Monitoring. Laboratory contact information: Anatek Labs, Inc. – Moscow 1282 Alturas Drive Moscow, Idaho 83843 (208) 883-2839
How does the facility analyze pH?	The facility analyzes pH with a pH meter and probe. A contract company calibrates the pH meter, and all other analytical equipment, annually.
Where are samples collected?	Influent samples are collected at the headworks. Effluent samples are collected at the v-notch weir after dechlorination.
Is the facility sampling more frequently than required?	The facility samples weekly rather than monthly and the additional samples are calculated into the averages reported on monthly DMRs.
Are any upgrades planned at the facility?	The City is planning to build a new facility. A call for construction bids will be going out this year.

SECTION II – Observations

No deficiencies were observed during the site tour.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		AOC: Yes
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 05/22/2023
Upon review of data in EPA's ICIS database, I found the facility was late in submitting nine scheduled documents and did not submit one scheduled document.		
Record: DMR Reports		AOC: Yes
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 05/22/2023
Upon review of data in EPA's ICIS database, I found the facility was late in submitting two Discharge Monitoring Reports (DMRs), submitted two incomplete DMRs, and one DMR was not received.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		AOC: Yes
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 05/22/2023
Upon review of data in EPA's Integrated Compliance Information System (ICIS) database for the period May 1, 2018, through April 30, 2023, I found the facility had exceeded the permitted limit for Temperature four times. Table I of the Permit states the temperature must not exceed 24.7°C. Those exceedances were for the monitoring periods August 2019, July 2021, August 2021, and July 2022. ICIS data shows that each of the exceedances was recorded as 25.6°C.		

SECTION IV – Areas of Concern

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	Records Review: Other - EPA's ICIS Database
Permit Requirement	
Permit Part I.B.1 , "...the permittee must limit and monitor discharges from Outfall 001 as specified in Table 1...The permittee must comply with the effluent limits in the tables at all times unless otherwise indicated, regardless of the frequency of monitoring or reporting required by other provisions of this permit."	
AOC:	
I found the facility had exceeded the permitted limit for Temperature four times. Table I of the Permit states the temperature must not exceed 24.7°C. Those exceedances were for the monitoring periods August 2019, July 2021, August 2021, and July 2022. ICIS data shows that each of the exceedances was recorded as 25.6°C.	

AOC Reference #: RA1-RR-002	Records Review: DMR Reports
Permit Requirement	
Permit Part III.B , "Monitoring data must be submitted electronically to EPA no later than the 20th of the month following the completed reporting period."	
AOC:	
I found the facility was late in submitting two Discharge Monitoring Reports (DMRs), submitted two incomplete DMRs, and one DMR was not received.	
A table of the missing and late documents is in Appendix II .	

AOC Reference #: RA1-RR-003	Records Review: Other - EPA's ICIS Database
Permit Requirements Permit Part I.B, Table I, Footnote 7, "Use the temperature device manufacturer's software to generate (export) an Excel text or electronic ASCII text file. The file must be submitted annually to the EPA and IDEQ by February 20th for the previous monitoring year along with the placement log." Permit Part I.C.8.b, "...the permittee must submit all surface water monitoring results for the previous calendar year for all parameters in an annual report to EPA and IDEQ by February 20th of the following year..." Permit Part I.D.3, "By July 31, 2021, the permittee must complete and submit to EPA and DEQ an evaluation of alternatives the City may use to achieve the final temperature effluent limits. The evaluation should at a minimum consider: facility improvements, alternative discharge locations, re-use of effluent and possible trading mechanisms such as offsite mitigation, including wetland and habitat restoration." Permit Part II.A, "...January 31, 2019, the permittee must submit written notice to EPA and IDEQ that an operations and maintenance plan for the current wastewater treatment facility has been developed, or updated, and implemented." Permit Part II.D.4, "The Permittee must submit this list, along with a summary description of the sources and information gathering methods used to develop this list, to EPA and IDEQ by July 31, 2020." Permit Part II.E.2, "The permittee must submit written notice to EPA and IDEQ that the plan has been developed and implemented by January 31, 2019."	
AOC: I found the facility was failed to submit one scheduled document and was late in submitting nine additional documents. A table of the missing and late documents is in Appendix II.	

SECTION V – Closing Conference

I held a closing conference with Mr. Cope at 3:15 PM on 03/20/2023. During the conference, I discussed my observations and Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VI – List of Appendices

- I. Photo Log
- II. Areas of Concern Tables

APPENDIX I: Photo Log

- P1010609 – Lift Station, interior
- P1010610 – Grit Chamber
- P1010611 – Aeration Chamber with Return Activated Sludge (RAS) Return lines, photo 1
- P1010612 – Aeration Chamber with Return Activated Sludge (RAS) Return lines, photo 2
- P1010613 – Grit Bed
- P1010614 – Clarifier
- P1010615 -- Chlorine Contact Chamber
- P1010616 – V-Notch Weir with Dechlorination Tab Holders
- P1010617 – V-Notch Weir, Effluent Dechlorination/Sampling Location
- P1010618 – Settling Pond, photo 1
- P1010619 – Settling Pond with close-up of Outfall Pipe
- P1010620 – Settling Pond, photo 2
- P1010621 – Drying Beds, photo 1
- P1010622 – Drying Beds, photo 2

APPENDIX II: Areas of Concern Tables

DMR Areas of Concern

End Monitoring Period	Due Date	Received	Notes
5/31/2018	6/15/2018	8/19/2019	Late.
8/31/2018	9/20/2018		Not Received. Administratively Resolved on 10/21/2021.
9/30/2018	10/20/2018	8/20/2021	Incomplete. Administratively Resolved on 11/20/2020. Facility did not submit data for BOD, 5-day, 20 deg. C and Solids, total suspended.
12/31/2018	1/20/2019	1/11/2019	Incomplete. Administratively Resolved on 2/20/2021. Facility did not sample for, or failed to submit data, for: Nitrite + Nitrate total [as N]
7/31/2019	8/20/2019	1/14/2022	Late. Facility was late in submitting data for: Temperature, water deg. Centigrade.

Schedule Violations

Schedule Event	Schedule Date	Received Date	Citation	Status
Operations and Maintenance Plan	2/1/2019	9/23/2019	Part II.A	Late
Emergency Response and Notification Plan	2/1/2019	3/2/2020	Part II.E.2	Late
Annual Report of Progress	8/1/2019	3/25/2020	Part I.D.3	Late
Surface Water Monitoring Report	2/20/2020	7/20/2020	Part I.C.8.b	Late
Annual Report of Progress	8/1/2020	11/4/2020	Part I.D.3	Late
Effluent Monitoring Report	2/20/2021	3/2/2022	Part I.B, Table I, Note 7	Late
Industrial User Survey	8/20/2021		Part II.D.4	Not Received
Effluent Monitoring Report	2/20/2022	1/25/2023	Part I.B, Table I, Note 7	Late
Surface Water Monitoring Report	2/20/2022	1/25/2023	Part I.C.8.b	Late
Annual Report of Progress	8/1/2022	1/25/2023	Part I.D.3	Late