



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
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Ref: Region 8, Montana Office

CERTIFIED EMAIL
RETURN RECEIPT REQUESTED

Chris Adler, Mayor
City of Ronan
207 Main Street SW, Suite A
Ronan, Montana 59864

Re: Inspection Report for Ronan Water Treatment Plant, MTDW00011

Dear Mayor Adler:

On June 14, 2022, representatives of the U.S. Environmental Protection Agency and The Confederated Salish & Kootenai Tribes of the Flathead Reservation (CSKT) inspected the Ronan Water Treatment Plant in Ronan, Montana, to evaluate compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit requirements and the Clean Water Act. 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
EPA Region 8
Prideaux.Lisakay@epa.gov

Wilhelmina Keenan
CSKT Environmental Director
Willie.keenan@CSKT.org

Please contact me at 406-457-2055 or Prideaux.lisakay@epa.gov 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 13:46:57
-06'00'

Enclosures:

- 1) NPDES Inspection Report
- 2) Photo Log

cc (electronic):

The Honorable Tom McDonald, Chairman, CSKT (email)
Wilhelmina Keenan, Environmental Director, CSKT (email)
Evan Smith, Water Quality Regulatory Specialist, CSKT (email)

NPDES Inspection Report – Water Treatment Plant

National Database Information	
Inspection Date: June 14, 2022	Inspection Type: Compliance Evaluation Inspection
Entry/Exit Time: 08:00 / 12:00	NPDES ID Number: MTDW0001I
NAICS Code: 221310	Inspection ID: 202206 MTDW0001I
Lead inspector and affiliation: Lisa-kay Prideaux / US EPA Region 8 Montana Operations Office	
Inspector and affiliation: Evan Smith / The Confederated Salish & Kootenai Tribes of the Flathead Reservation	

Facility Location Information	
Site/Facility Name & Location: Ronan Water Treatment Plant 46604 Michel Road Ronan, Montana 59864	Mail Report to: Mayor Chris Adler 207 Main Street SW, Suite A Ronan, Montana 59864

Contact Information		
	Name(s)/Title	Telephone
Facility Contacts:	Dan Miller / Public Works Director / City of Ronan / present during inspection	406-676-0243
Person/Company meeting definition of “Operator”	Chris Atkinson / Water Plant Operator / City of Ronan / present during inspection	406-676-0243

Permit Information	
Is the permit on site and available? yes	
Effective Date: October 28, 2019	Expiration Date: June 30, 2024
Latitude: 47.540833° N	Longitude: -114.037500° W
Receiving Water(s): Pablo Feeder Canal flowing to Middle Crow Creek	
Regulatory Inspector’s source of information: Drinking Water General Permit, Authorization Letter, EPA records, facility records, facility representatives, and field observations.	

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

Report Review and Signature		
Drafter Signature/Name	Address/Phone Number	Date
 Digitally signed by Prideaux, LisaKay Date: 2022.08.11 13:48:17 -06'00'	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626	08.02.2022
Lisa-kay Prideaux	406-457-5022	
Reviewer Name	Address/Phone Number	Date
Kristin Ratajczak	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	08.03.2022
Kristin Ratajczak	303-312-6310	
Management Signature/Name	Address/Phone Number	Date
 Digitally signed by Boeglin, Michael Date: 2022.08.11 12:51:20 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NP Denver, Colorado 80202	08.11.2022
Michael Boeglin	303-312-6250	

Inspection Narrative and Site Description

The City of Ronan owns and operates the Ronan Water Treatment Plant (facility) located on the Flathead Reservation, in Ronan, Montana. EPA Region 8 issues National Pollutant Discharge Elimination System (NPDES) permits on tribal lands in Montana. The facility is currently authorized to discharge under the NPDES Drinking Water General Permit (General Permit) with the permit number MTDW00011. Authorization under the General Permit became effective October 28, 2019, and will expire on June 30, 2024, and is associated with the wastewater treatment system for the facility. The facility is currently under an active Administrative Order (CWA-08-2019-0008), filed September 5, 2019. The U.S. Environmental Protection Agency (EPA) conducted an inspection of the facility to evaluate its wastewater discharge, and compliance with the General Permit and Administrative Order.

On Tuesday, June 14, 2022, EPA inspector Lisa-kay Prideaux, and the Water Quality Regulatory Specialist for the Confederated Salish Kootenai Tribes, Evan Smith, began the announced inspection. The inspection commenced at approximately 08:00, when inspectors arrived at the Ronan City Hall, presented credentials and identification to Dan Miller, the City of Ronan's Public Works Director, and Chris Atkins, the City of Ronan's Water Treatment Plant Operator, and had an opening conference to explain the purpose of the inspection. The inspectors proceeded to ask a series of questions of the facility representatives, review documentation, and complete a site visit to help them evaluate the facility. Throughout the inspection, observations and photograph descriptions were documented. All photographs taken during the inspection are included in the attached photo log.

The facility provides municipal water for the city and rural water distribution system. The facility was originally constructed in 2008, with an upgrade in 2018 to the current membrane filtration system. The facility draws approximately 0.125 MGD from Middle Crow Creek and treats it for domestic use. The city also has two (2) water wells that can be used to draw water, as backup water sources.

Raw water flows through one particulate screen (3,500 microns) and one fine particulate screen (130 microns), followed by a membrane filtration unit. Following filtration, water flows through ultraviolet (UV) disinfection. Treated water is routed to a clear well, where chlorine is added prior to distribution.

The facility backwashes its filters several times a day which produces wastewater that's discharged to the Pablo Feeder Canal through outfall 001. The facility's wastewater discharge flow rate was designed at 14 gallons per minute. The screens and membrane filters undergo two types of backwashes. The screen backwashes are triggered by a pressure differential, backwashed for 5-10 seconds at a time, and backwash water is discharged directly to outfall 001. The filtration membranes are backwashed using treated water from the clear well every 11,978 gallons or 79 production minutes. This backwash is collected in six (6) 2,000-gallon tanks and the either neutralized and discharged, used for irrigation of facility grounds, used on roads for dust suppression, and/or land applied.

The membrane filters are also backwashed and cleaned with citric acid, sodium bisulfate, and chlorine (T-Chlor) solutions. This backwash is triggered by a pressure differential within the membranes and is collected and the wastewater is stored in two (2) 1,000-gallon tanks. This wastewater is not discharged through the outfall; it is hauled offsite for land application. Outfall 001 also consists of overflow water from the intake pipe at Middle Crow Creek; overflow water is the volume of water pulled from the creek that is above the treatment volume. This overflow is a continuous discharge. There is also a drain in the

clear well leading to Outfall 001, for when the facility needs to drain the clear well for maintenance or emergencies.

A review of facility records commenced, and inspectors reviewed records including, but not limited to the following: the General Permit; facility authorization letter; permit monitoring and reporting requirements for the timeframe of October 1, 2021, through March 31, 2022; permit compliance responsibilities; operations and maintenance records; and laboratory records.

After the facility representative interviews and records review, the inspectors walked through the facility. The inspectors commenced the walk-through at the facility, and observed the influent meter (photo 528), two (2) water treatment trains (photos 529-531), the cleaning and neutralization systems for the backwash filter trains (photos 532 & 533), disinfection system (photo 534), and discharge location (photos 535-537).

A closing conference was held on-site with Mr. Miller and Mr. Atkins, during which inspectors discussed preliminary findings, as well as the process for the inspection report. The inspection concluded at approximately 12:00 pm. On June 23, 2022, the EPA sent an email to Mr. Miller and Mr. Atkins with the preliminary findings from the inspection.

Findings, Corrective Actions and Recommendations

Finding #1:

In-house sample log sheets for pH, temperature and total residual chlorine did not include the necessary details. Specifically, the sample collection date, time and initials of personnel collecting the sample, analysis date, time, personnel conducting the sample analysis, and method in which the analysis is being conducted for in-house samples were not being documented.

Permit requirements:

- Part 5.1 of the General Permit requires the facility to comply with all conditions of the General Permit and Authorization MTDW0001I.
- Part 4.6 of the General Permit states the recording of monitoring information to include the date, exact place, and time of sample collection (4.6.1), the initials/name of individual performing the sample collection (4.6.2), the date analyses were performed (4.6.3), time analyses were initiated (4.6.4), initials/name of individual performing the sample analyses (4.6.5), and references and written procedures for the analytical techniques or methods used for analyses (4.6.6).
- Part 4.7 of the General Permit requires the retention of all records containing monitoring information for a period of at least three (3) years.

Corrective Action:

Ensure in-house sample log sheets for pH, temperature and total residual chlorine contain all required elements, including, but not limited to the following: collection date; time; and personnel collecting samples; sample analysis date; time; personnel conducting the analysis; and method in which the analysis is being conducted. In the response to this report, provide the EPA and CSKT with a description of the corrective actions taken to address this finding.

Finding #2:

The facility is not conducting weekly inspections. Specifically, during the inspection, facility staff indicated weekly facility inspections were being completed; however, the inspections were not being documented.

Permit requirement:

- Part 5.1 of the General Permit requires the facility to comply with all conditions of the General Permit and Authorization MTDW0001I.
- Part 5.5.1 of the General Permit states the facility must inspect the treatment systems to include, at a minimum, the following (Parts 5.5.1.1-5.5.1.7): state of discharge, leakage through dikes, animal burrows within the dike, excessive erosion of dike walls, removal of rooted plants (including weeds) in water, vegetation growth on dikes needing mowing, and if proper operations and maintenance procedures are being completed as required by the facility program.
- Part 5.5.2 of the General Permit states facility operator(s) must maintain a log (paper or electronic) containing the information obtained during the inspection. The log must contain the following information (stated in Parts 5.5.2.1-5.5.2.8): date and time, name of the inspector, facility discharge status, flow rate of the discharge if occurring, identification of operational problems and/or maintenance problems, recommendation to remedy identified problems, description of actions taken with identified problem, and any other appropriate information pertaining to the identified problem. Part 5.5.2.9 of the General Permit states the inspections must be maintained in accordance with proper record-keeping procedures.

Corrective Action:

Conduct weekly inspections of the facility and maintain the inspections reports. In the response to this report, provide the EPA and CSKT with a description of the corrective actions taken to address this finding.

Finding #3:

The facility did not have an operations and maintenance program in place. Specifically, the facility did not have a documented schedule for equipment and facility operations and maintenance, a routine for conducting operations and maintenance activities, or records to document any operations and maintenance schedules or activities.

Permit requirement:

- Part 5.1 of the Drinking Water General Permit (General Permit) requires the facility to comply with all conditions of the General Permit and Authorization MTDW0001I.
- Part 5.6.1 of the General Permit states the facility must have an operations and maintenance program as soon as practicable, but no later than 6 months after the effective date of the permit. The Ronan Water Treatment Plant received authorization under the DWGP on October 28, 2019.
 - Part 5.6.1.1 of the General Permit states the facility must have a current operations and maintenance manual that describes the proper operational procedures and maintenance requirements of the wastewater treatment system.
 - Part 5.6.1.3 of the General Permit states the facility must have a schedule for routine operations and maintenance activities at the facility. Part 5.6.1.4 of the General Permit states the facility operator(s) must perform the routine operation and maintenance requirements in accordance with the schedule.

- Part 5.6.2 of the General Permit states facility operator(s) must maintain a log (paper or electronic) containing a summary record of all operations and maintenance activities at the facility. The log must contain the following information (stated in Parts 5.6.2.1-5.6.2.5): date, time, name and title of person making the log entry, name of person performing the activity, brief description of the activity, and any other appropriate information pertaining to the activity. Part 5.6.2.3 states the log must be maintained in accordance with proper record-keeping procedures.

Corrective Action:

Develop an operation and maintenance program, including a manual that describes the proper operational procedures and maintenance requirements of the facility. In the response to this report, provide the EPA and CSKT with a description of the corrective actions taken to address this finding.

Finding #4:

Inspectors evaluated Discharge Monitoring Reports (DMRs) for the timeframe between October 1, 2021, through March 31, 2022. The facility was late submitting three (3) DMRs. Specifically, for the monitoring periods in the table below, the facility submitted DMRs past the required submittal deadline.

DMR Monitoring period & location	DMR due date	DMR Submitted	Days late
October 31, 2021 (DWCD-M)	January 28, 2022	February 8, 2022	11 days
November 30, 2021 (DWCD-M)	January 28, 2022	February 8, 2022	11 days
December 31, 2021 (DWCD-M)	January 28, 2022	February 8, 2022	11 days

Permit requirements:

- Part 5.1 of the General Permit requires the facility to comply with all conditions of the General Permit and Authorization MTDW0001I.
- Part 4.4 of the General Permit requires the electronic submittal of DMRs quarterly using NetDMR, and the submissions must be made no later than the 28th of the month following the completed reporting period.

Corrective Action:

Submit DMRs by the date required within the permit. In the response to this report, provide the EPA and CSKT with a description of the corrective actions taken to address this finding.