

NPDES Wastewater Lagoon Inspection Report – Non-discharging

National Database Information	
Inspection Date: June 13, 2022	Inspection Type: Reconnaissance Inspection
Entry/Exit Time: 09:49 / 10:20	NPDES ID Number: MTU000045
NAICS Code: 22132-Sewage Treatment Facility	Inspection ID: 202206 MTU000045
Lead inspector and affiliation: Lisa-kay Prideaux, U.S. Environmental Protection Agency	
Inspector and affiliation:	
Inspector and affiliation:	

Facility Location Information	
Site/Facility Name & Location: Hot Springs Trailer Court Flathead Reservation Hot Springs, Montana 47.62560°N; -114.629179°W	Mail Report to: Anita Swope Hot Springs Trailer Court P.O. Box 488 Hot Springs, Montana 59845

Contact Information	
	Name(s)/Title
Facility Contacts:	Jay Skellenger, Hot Springs Trailer Court (not present)
Person/Company meeting definition of “Operator” per the <i>permit type and relevant citation here</i>	Anita Swope, Owner, Hot Springs Trailer Court (not present)
Authorized Official(s)	Anita Swope, Owner, Hot Springs Trailer Court
Tribe Representative(s)	Evan Smith, Water Quality Regulatory Specialist, Confederated Salish & Kootenai Tribes (present)
Indian Health Service Representative(s)	None present

Permit Information		
Is the permit on site and available? N/A	Lagoon Category: No discharge	Monitoring Frequency: N/A
Effective Date: Unpermitted	Expiration Date: Unpermitted	Is the Facility under a compliance schedule? N/A
Is correct contact information indicated on ICIS? yes	Indicate correct contact information:	
Receiving Water(s): Non-discharging, two-celled lagoon system		
Discharge point location (longitude, latitude): N/A		

Regulatory Inspector's source of information:

Aerial imagery, EPA records, historic inspection reports, facility personnel, site review.

Areas Evaluated During Inspection

<u>Permit</u>	<u>Effluent/Receiving Waters</u>	<u>Compliance Schedule</u>
<u>Records/Reports</u>	<u>Flow Measurement</u>	<u>Discharge Monitoring Reports</u>
<u>Facility Site Review</u>	<u>Monitoring Program</u>	<u>Lift Station Operation and Maintenance</u>
<u>Collection System Review</u>	<u>Lagoon Self- Inspections</u>	<u>Preventive and Emergency Operation and Maintenance</u>

Report Review and Signature

Drafter Signature/Name	Address/Phone Number	Date
	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626	07.08.2022
Lisa-kay Prideaux	406-457-5022	
Management Signature/Name	Address/Phone Number	Date
Boeglin, Michael Digitally signed by Boeglin, Michael Date: 2022.07.14 09:47:48 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	07.14.2022
Michael Boeglin	303-312-6250	

Inspection Narrative and Site Description

On Monday, June 13, 2022, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux, and the Water Quality Regulatory Specialist for the Confederated Salish Kootenai Tribes, Evan Smith, conducted an unannounced inspection to evaluate compliance with the Clean Water Act and EPA regulations. The inspection commenced at approximately 09:50, when Lisa-kay and Evan arrived at the facility. No one was available to present credentials or answer questions, so all areas were observed from the public right of way. Throughout the inspection, observations and photograph descriptions were documented. All photographs taken during the inspection are included in the attached photo log.

Hot Springs Trailer Court is a 17-lot trailer court located off Montana Highway 28, northeast of the Town of Hot Springs. The wastewater treatment is from a two-cell facultative lagoon system operating in parallel. The lagoons are located in a field northwest of the trailer court. The lagoon system was expanded in fall of 2008 from one cell to two cells. The old lagoon is the east cell and approximately 80-feet square (photo 513); the new lagoon is the west cell and is approximately 190-feet by 72-feet (photo 514). The treatment system consists of septic tanks at each lot, which drain effluent into two main septic tanks. The main septic tanks have pumps and act as sewage lift stations, pumping effluent into the lagoons. Lift station #1 is located between lots 14 & 15 and serve lots 10, 11, 14, & 15; lift station #2 is located between lots 15 & 16 and serve lots 12, 13, 16, & 17. Both have a light and sound alarm system to indicate power failures. Remaining lots (1-9) are arranged to have their septic tanks discharge into leach fields.

The site inspection included driving through the court to identify the lift station locations, septic tank locations (photos 512 & 515) and drive into the field to inspect the lagoons from outside the fencing. Evan and I walked the perimeter of the lagoon fencing confirming the fence was intact with no damaged areas. The wastewater within the lagoons was a murky brown color with no floating solids or odor. Two turtles were noted in the east cell. High grass surrounded the lagoons and up onto the lagoon walls making it difficult to identify any potential seeps or rodent problems.

On July 08, 2022, Lisa-kay Prideaux spoke with Mr. Skellenger to confirm changes since the last inspection in 2019. I indicated the vegetation surrounding the lagoons should be mowed in order to conduct a self-inspection of the lagoon wall's integrity.

Findings, Corrective Actions and Recommendations

Finding #1

The facility was not being maintained. Specifically, the vegetation on the lagoon cell walls was overgrown with grasses at least 24 inches in height.

EPA guidance:

EPA has developed guidance manuals on the proper operation and maintenance of lagoons. One of the guidance materials is titled 'Principles of Design and Operations of Wastewater Treatment Pond Systems for Plant Operators, Engineers, and Managers' (August 2011, EOA/600/R-11/088).

Part 9.4.2.3 of this guidance manual indicates the following:

- To maintain wave action, a pond should be free of weeds in the water or tall weeds on the banks.
- Dikes should be well seeded with grasses above the water line. Grass should be mowed regularly to prevent soil erosion and insect problems.

Corrective Action:

EPA recommends the vegetation in and around the lagoon cells be reduced and maintained below 6-inches in height such that the berms can be inspected for leakage, animal burrows, and erosion. Proper vegetation height allows for the wind to naturally generate wave action to mix and aerate the lagoon contents for effective treatment of the wastewater. Increased wind action on the lagoon surface increases evaporation as well as reduces the likelihood of mosquito breeding.