



NPDES Compliance Inspection Report

City of Craigmont Wastewater Treatment Plant

Winchester, Idaho

Permit #: ID0021288

Inspection Date: July 31, 2023

Prepared by:

Kevin Stockton
PG Environmental

Prepared for:

Environmental Protection Agency Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Surface Water Enforcement Section
Signature/Date:

JASON RODRIGUEZ Digitally signed by JASON RODRIGUEZ
Date: 2023.10.25 13:50:50 -07'00'

Supervisor Signature/Date:

Marshalonis, Daniel (Dino) Digitally signed by Marshalonis, Daniel (Dino)
Date: 2023.10.27 15:01:47 -07'00'

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All details in this report were obtained through conversations with Bob Samsel (Maintenance Supervisor, City of Craigmont) or from observations made during the inspection.

I. Facility Information

Facility Name: City of Craigmont Wastewater Treatment Plant (WWTP)

Facility Owner: City of Craigmont, Idaho (Permittee)

Facility Operator: City of Craigmont, Idaho

Facility Address: US-95 and Lauer Road
Craigmont, Idaho 83523

Lat/Long: 46.23083 N, -116.4575 W

Mailing Address: City of Craigmont
P.O. Box 250
Craigmont, Idaho 83523

Facility Contact: Richard "Bob" Samsel, Maintenance Supervisor
City of Craigmont
Phone: (208) 507-1417
Email: craigmontpwd@gmail.com

Permit Number: ID0021288

Receiving Water: John Dobb Creek to North Fork Lawyers Creek

II. Inspection Information

Inspection Date: July 31, 2023

EPA Inspection Team: Kevin Stockton
PG Environmental
Phone: (720) 789-8050
Email: kevin.stockton@pgenv.com

Chris Pardo
PG Environmental
Phone: (703) 398-4251
Email: Chris.Pardo@pgenv.com

Arrival Time: 12:15 PM

Departure Time: 1:50 PM

Purpose: To determine compliance with National Pollutant Discharge Elimination System (NPDES) Permit No. ID0021288 and Administrative Order on Consent (AOC) Docket No. CWA-10-2021-0117.

III. Permit Information

The Craigmont WWTP (“WWTP” or “Facility”) is permitted under NPDES Permit No. ID0021288 (“Permit”). The Permit became effective on June 1, 2020 and is due to expire on May 31, 2025. In July 2021, EPA issued AOC Docket No. CWA-10-2021-0117 due to violations of the Permit’s effluent limitations for 5-day biochemical oxygen demand (BOD₅), total residual chlorine (TRC), and total suspended solids (TSS). The AOC requires the Permittee to develop a Facility Plan by June 1, 2021 and fully implement the Facility Plan by June 1, 2025 including “actions and the construction of all upgrades and remedial measures necessary to how achieve and maintain compliance with the effluent limitations and requirements of the Permit.” Refer to Section VII (File Review), below, for more information about the Permittee’s progress developing and implementing the Facility Plan.

IV. Background

The City of Craigmont ("City"), located in Lewis County and within the boundary of the Nez Perce Reservation, owns, operates, and maintains the Facility. The WWTP consists of a primary and secondary lagoon system followed by chlorination, dechlorination, and sand filtration. Effluent from the Facility is intermittently discharged to John Dobb Creek.

Craigmont is a small community with a population of approximately 500 people (based on 2010 Census). The collection system is a separate sanitary sewer system serving residential connections and one restaurant. The Permittee has not identified industrial wastewater discharges into the system. The treatment system has a designed maximum flow rate of 0.12 million gallons per day (MGD).

The City’s Maintenance Supervisor, Bob Samsel (“Facility Representative”), is responsible for operating and maintaining the WWTP and collection system.

V. Inspection Chronology

On July 24, 2024, EPA notified the Permittee of the inspection via email. The Facility’s Maintenance Supervisor agreed to meet representatives from PG Environmental, an EPA Contractor (“EPA Inspection Team”), at the Facility on the afternoon of July 31, 2023 for the inspection.

The EPA Inspection Team arrived at the facility at 12:15pm on July 31, 2023. Mr. Kevin Stockton with PG Environmental presented his Clean Water Act (CWA) inspector

credentials and explained the purpose of the inspection to the Facility Representative. The inspection consisted of introductions, an opening conference, a Facility review, a file review, and a closing conference.

During the Facility review, the EPA Inspection Team observed each stage of the treatment process starting at the headworks of the facility and working down the treatment train. Following the Facility review, the EPA Inspection Team conducted a file review at the Maintenance Building, located approximately 0.5 miles northwest of the Facility. During the closing conference, the EPA Inspection Team discussed preliminary observations with the Facility representative. The EPA Inspection Team thanked the Facility Representative for their time and departed from the Maintenance Building at approximately 1:50 pm. Photographs taken during the inspection can be found in Attachment A, Photograph Log.

VI. Facility Review

The Facility is located along Highway-95, situated just outside of the City limits. Untreated wastewater enters the Facility from the City's sanitary sewer collection system, into an influent vault structure that is equipped with a Parshall flume for flow measurement (refer to Attachment A, Photographs 1 and 2). From the influent vault structure, flow enters the primary lagoon (refer to Attachment A, Photographs 3 and 4). Flow from the primary lagoon enters the secondary lagoon through a valve box located between the lagoons (refer to Attachment A, Photographs 5, 6, and 7). Neither lagoon is aerated. Effluent from the secondary lagoon flows through a v-notch weir, for effluent flow measurement, where it is dosed with gaseous chlorine for disinfection (refer to Attachment A, Photographs 8 through 11). The Facility representative stated that approximately three to four pounds of gaseous chlorine is typically used per day. From the v-notch weir, flow enters an open-top chlorine disinfection unit (refer to Attachment A, Photograph 12). Once full, the chlorine disinfection unit is manually emptied into one of the Facility's three sand filters (refer to Attachment A, Photographs 13 through 17). Effluent flow from the sand filters discharges intermittently to John Dobb Creek via Outfall 001 at the southeast perimeter of the Facility (refer to Attachment A, Photograph 18).

A small out-building located near the effluent v-notch weir serves as a field laboratory and chlorine storage space. Flow, pH, temperature, and TRC are analyzed on site. Ammonia, BOD₅, TSS, and E. coli are analyzed offsite by Anatek Labs in Moscow, ID.

Effluent flow is dechlorinated using sodium sulfite tablets at the sand filters and at the Outfall 001 discharge point. The Facility has installed improvised dichlorination units, fabricated from 5-gallon buckets at the sand filters. The Facility representative explained that the improvised dechlorination units were installed at the sand filters because the dechlorination unit at the discharge point was not always sufficient for removing TRC. He stated dechlorination has been more reliable since installing the improvised dechlorination units at the sand filters, resulting in fewer exceedances of the Permit's TRC effluent limitation. At the time of inspection, the facility had not exceeded the TRC limit in 2023. The Facility exceeded the TRC limit six times in 2022.

The Facility was last inspected in 2019. Since that inspection, the Permittee has made safety improvements at Outfall 001. The Permittee installed a concrete slab at the outfall to provide a stable surface for sample collection and replaced the earthen/wooden stairs for accessing the outfall with sturdier metal stairs.

VII. File Review

The EPA Inspection Team reviewed the following documents during the file review portion of the inspection:

- Quality Assurance Plan and Standard Operating Procedures
- NPDES Permit No. ID0021288
- Facility Operations and Maintenance Manual
- City of Craigmont 2022 Wastewater Improvement Plans (i.e., “Facility Plan”)
- Lab Reports and Monitoring Data from 2020 through 2023

The Permittee maintains hardcopy documentation for onsite parameter analysis and third-party laboratory reports at the Maintenance Building. The EPA Inspection Team did not observe any mathematical or transcription errors in the Facility’s monitoring and reporting documentation.

In order to comply with the AOC, the Permittee has contracted Mountain Waterworks, Inc. to design a new wastewater treatment system at the Facility. The preliminary plans involve decommissioning the existing lagoons and sand filters and installing a new headworks with an automated bar screen (and a manual bar screen for backup), three new aerated lagoons, and two submerged aerated rock filters. Effluent will still be chlorinated and dechlorinated prior to discharge at the existing Outfall 001 location. The Facility representative explained that the capital cost for the project is estimated at approximately \$7 million. The Permittee plans to utilize a combination of United States Department of Agriculture (USDA) grant funding, American Rescue Plan Act (ARPA) grant funding, and Idaho State Revolving Fund (SRF) funding. The Facility representative stated that the new treatment system is expected to be operational by the end of 2024, and any remaining funds will be allocated to collection system improvements.

VIII. Areas of Concern

The following areas of concern were noted during this inspection:

A. Effluent Limitations and Monitoring

Section I.B of the Permit identifies effluent limitations for discharges to John Dobb Creek from the Facility’s Outfall 001 (Table 1) and states, “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. “

According to EPA’s Integrated Compliance Information System (ICIS), the Facility

had 35 effluent violations between June 30, 2018 and February 28, 2023, including:

- 14 TRC violations
- 11 TSS violations
- 5 BOD₅ violations
- 4 pH violations
- 1 E.coli violation.

Attachment B contains additional details about the violations. As previously mentioned, the Permittee has had fewer TRC violations since installing the improvised dechlorination units at the Facility's sand filters.

B. Representative Monitoring

Section III.A of the Permit states, "Samples and measurements taken for the purpose of monitoring must be representative of the monitored activity."

The EPA Inspection Team observed that effluent flow is not measured at the end of the treatment process but is instead measured in between the secondary lagoon and the chlorination chamber (before the sand filters and dechlorination units). The Facility Representative explained that he estimates the average daily effluent flow based on how long it takes the chlorination unit to empty through the sand filters and outfall (typically several days). Because effluent flow is not physically measured at the end of the treatment process, the calculation of effluent pollutant loadings from the Facility may not be accurate.

C. Proper Operation and Maintenance

Section IV.E of the Permit states that "The permittee must 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."

The inspectors observed the following maintenance needs at the Facility:

- a. Heavy solids accumulation at the influent vault structure (refer to Attachment A, Photograph 1).
- b. Solids accumulation and several dead ducks in the valve box in between the two lagoons (refer to Attachment A, Photographs 6 and 7).
- c. Damage to the staff gauge at the effluent v-notch weir, which may inhibit accurate flow measurement (refer to Attachment A, Photograph 10).

D. Operation and Maintenance Plan

Section II.A of the Permit states, "the permittee must develop and implement an Operations and Maintenance (O&M) Plan for the wastewater treatment facility. Any existing O&M Plan may be modified for compliance with this section. Any changes occurring in the operation of the plant must be reflected within the O&M Plan."

At the time of the inspection, the Permittee's O&M Plan was not reflective of current

operational protocols. Specifically, the O&M plan did not reflect the dechlorination procedures being implemented at the Facility. The Facility representative stated that an updated O&M Plan would be developed as part of the upcoming Facility upgrades.

IX. Closing Conference

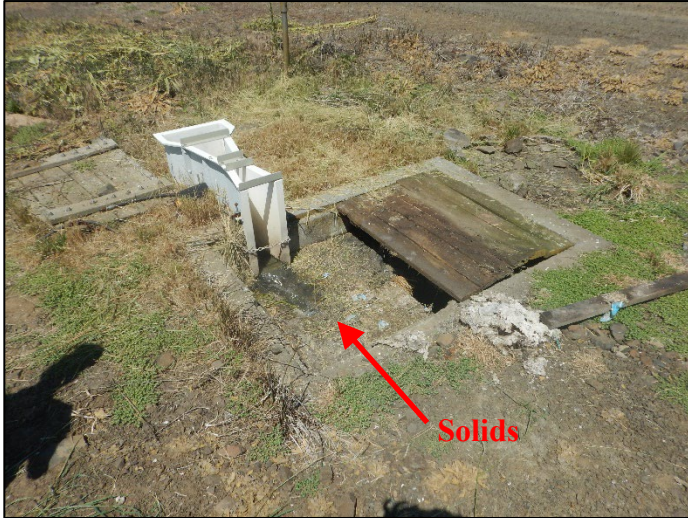
Following the walk-through and records review, the EPA Inspection Team held a closing conference with the Facility Representative. They discussed preliminary observations and gave a brief overview of the post-inspection process.

ATTACHMENT A

Photograph Log

All photographs taken by Chris Pardo on July 31, 2023

Photograph Log – Craigmont WWTP



Photograph #01 (DSCN9121)

Description: View of the Facility's influent vault structure equipped with Parshall flume for flow measurement. Note the heavy solids accumulation in the vault structure.



Photograph #02 (DSCN91215)

Description: View of the Facility's influent Parshall flume, as shown in Photograph 1.



Photograph #03 (DSCN9129)

Description: View, facing southeast, of the Facility's primary lagoon.



Photograph #04 (DSCN9130)

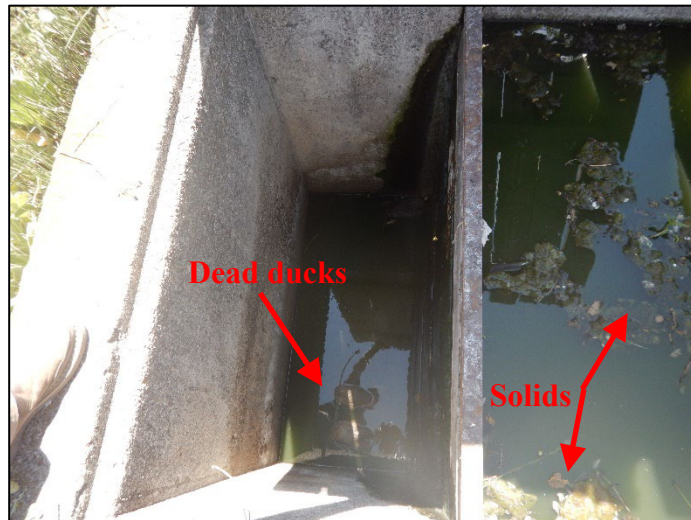
Description: View, facing north, of the Facility's primary lagoon.

Photograph Log – Craigmont WWTP



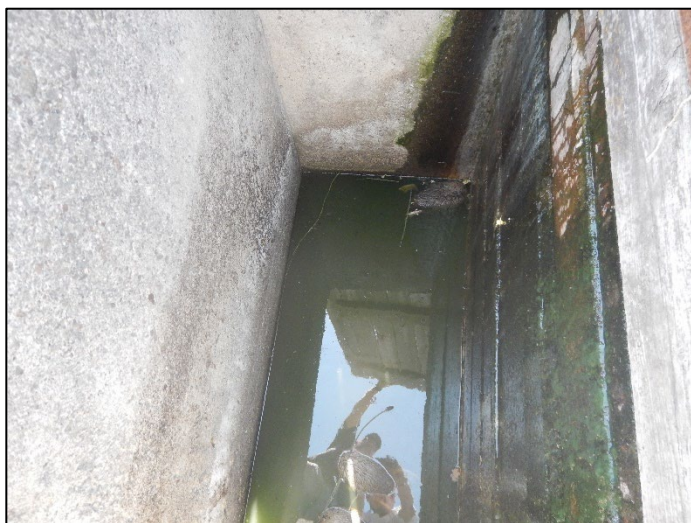
Photograph #05 (DSCN9132)

Description: View, facing northeast, of the Facility's secondary lagoon.



Photograph #06 (DSCN9171)

Description: View of the valve box in between the Facility's primary and secondary lagoons. Note the solids accumulation and dead ducks inside the valve box.



Photograph #07 (DSCN9174)

Description: Additional view of dead ducks inside the valve box in between the Facility's primary and secondary lagoons, as shown in Photograph 6.



Photograph #08 (DSCN9135)

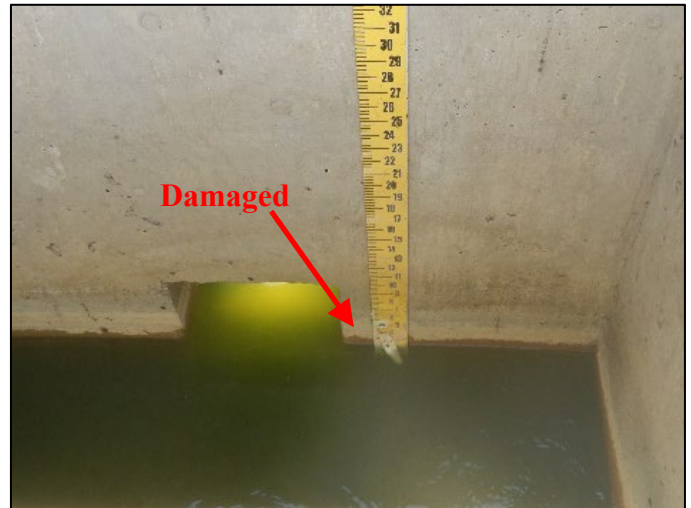
Description: View of the Facility's v-notch weir for measuring flow leaving the secondary lagoon.

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Photograph Log – Craigmont WWTP



Photograph #09 (DSCN9139)
Description: Additional view of the Facility's v-notch weir.



Photograph #10 (DSCN9138)
Description: View of the staff gauge for the Facility's v-notch weir. Note the damage to the staff gauge.



Photograph #11 (DSCN9141)
Description: View of the chlorine feed system inside the Facility's out-building.



Photograph #12 (DSCN9151)
Description: View of the Facility's disinfection unit.

Photograph Log – Craigmont WWTP



Photograph #13 (DSCN9152)

Description: View of manual valves for directing flow from the disinfection unit to the sand filters.



Photograph #14 (DSCN9157)

Description: View of one of the Facility's three sand filters.



Photograph #15 (DSCN9158)

Description: View of two of the Facility's three sand filters.



Photograph #16 (DSCN9159)

Description: View of one of the Facility's sand filters.

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Photograph Log – Craigmont WWTP



Photograph #17 (DSCN9156)
Description: View of an improvised dechlorination unit at one of the Facility's sand filters.



Photograph #18 (DSCN9162)
Description: View of the Facility's Outfall 001 to John Dobb Creek.

ATTACHMENT B

ICIS 5-year Exceedance Report

NPDES ID(s): ID0021288
State: ID
Major/Minor Indicator:
Violation Date: 06/01/2018 - 06/01/2023
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/15/2023
Report Version 1.5, Modified: 1/4/2017

ID0021288

Permittee Name:	CRAIGMONT, CITY OF	Primary SIC Code:	4952	Permit Issued:	04/21/2020
Permittee Address:	PO BOX 250 CRAIGMONT, ID 83523	Primary SIC Desc:	Sewerage Systems	Permit Effective:	06/01/2020
Major/Minor Indicator:	Minor	Primary NAICS Code:	221320	Permit Expired:	05/31/2025
Compliance Track. Status:	On	Primary NAICS Desc:	Sewage Treatment Facilities	Permit Status:	Effective
DMR Non Receipt Flag:	On	Cognizant Official:	MONTE THOMASON, MAINT SUPV		
RNC Tracking Flag:	On	Cognizant Offcl. Ph.:	208-924-5432		
		Receiving Body:	JOHN DOBBS CREEK		

Facility Information

Facility Name:	CRAIGMONT, CITY OF - CRAIGMONT WWTP	County:	Lewis	FRS ID:	110039886291
Facility Location:	STATE HIGHWAY 95, ON NEZ PERCE RESERVATION CRAIGMONT, ID 83523	Region:	10	Federal Facility Ownership:	N
		State-Region:	04	Type of Ownership:	Municipal or Water District

DMR Non-Receipt Violations

Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D80	06/30/2020	07/20/2020	001-A	00610 - Nitrogen, ammonia total [as N]	1	0	Q1	**E**	N 08/20/2020	0 08/20/2021	07/22/2020
D80	06/30/2020	07/20/2020	001-A	00610 - Nitrogen, ammonia total [as N]	1	0	Q2	**E**	K 08/20/2020	0 08/20/2021	07/22/2020
D80	06/30/2020	07/20/2020	001-A	00610 - Nitrogen, ammonia total [as N]	1	0	C1	**E**	N 08/20/2020	0 08/20/2021	07/22/2020
D80	06/30/2020	07/20/2020	001-A	00610 - Nitrogen, ammonia total [as N]	1	0	C3	**E**	K 08/20/2020	0 08/20/2021	07/22/2020

Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	02/28/2023	001-A	31648 - E. coli, MTEC-MF	1	0			C3 INST MAX	1,543.1 cfu/100ml	280%	<=406 cfu/100ml		
E90	12/31/2022	001-A	50060 - Chlorine, total residual	R	0	2		Q2 DAILY MX	.109 lb/d	118%	<=.05 lb/d		
E90	11/30/2022	001-A	00530 - Solids, total suspended	1	0	1		C2 MO AVG	36.6 mg/l	22%	<=30 mg/l		

NPDES ID(s): ID0021288
State: ID
Major/Minor Indicator:
Violation Date: 06/01/2018 - 06/01/2023
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/15/2023
Report Version 1.5, Modified: 1/4/2017

ID0021288													
Effluent Violations													
Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	11/30/2022	001-A	81011 - Solids, suspended percent removal	K	0	1		C1 MO AV MN	62.9 %	147%	>=85 %		
E90	06/30/2022	001-A	00400 - pH	1	0			C3	9.08		<=9		
E90	06/30/2022	001-A	50060 - Chlorine, total residual	R	0	2		Q1 MO AVG	.28 lb/d	460%	<=.05 lb/d		
E90	06/30/2022	001-A	50060 - Chlorine, total residual	R	0	2		Q2 DAILY MX	1.08 lb/d	2,060%	<=.05 lb/d		
E90	06/30/2022	001-A	50060 - Chlorine, total residual	R	0	2		C3 DAILY MX	.06 mg/l	20%	<=.05 mg/l		
E90	05/31/2022	001-A	00400 - pH	1	0			C3	9.47		<=9		
E90	04/30/2022	001-A	00400 - pH	1	0			C3	9.44		<=9		
E90	04/30/2022	001-A	00530 - Solids, total suspended	1	0	1		Q1 MO AVG	30.9 lb/d	3%	<=30 lb/d		
E90	04/30/2022	001-A	00530 - Solids, total suspended	1	0	1		C2 MO AVG	36.8 mg/l	23%	<=30 mg/l		
E90	04/30/2022	001-A	50060 - Chlorine, total residual	R	0	2		Q2 DAILY MX	.067 lb/d	34%	<=.05 lb/d		
E90	04/30/2022	001-A	50060 - Chlorine, total residual	R	0	2		C3 DAILY MX	.08 mg/l	60%	<=.05 mg/l		
E90	04/30/2022	001-A	81010 - BOD, 5-day, percent removal	K	0	1		C2 MO AV MN	84 %	7%	>=85 %		
E90	04/30/2022	001-A	81011 - Solids, suspended percent removal	K	0	1		C1 MO AV MN	79 %	40%	>=85 %		
E90	07/31/2020	001-A	50060 - Chlorine, total residual	R	0	2		C1 MO AVG	.07 mg/l	40%	<=.05 mg/l	T 07/31/2020	2 12/31/2020
E90	07/31/2020	001-A	50060 - Chlorine, total residual	R	0	2		C3 DAILY MX	.09 mg/l	80%	<=.05 mg/l		
E90	06/30/2020	001-A	50060 - Chlorine, total residual	R	0	2		Q2 DAILY MX	.1 lb/d	100%	<=.05 lb/d		
E90	06/30/2020	001-A	50060 - Chlorine, total residual	R	0	2		C1 MO AVG	.08 mg/l	60%	<=.05 mg/l	T 07/31/2020	2 12/31/2020
E90	06/30/2020	001-A	50060 - Chlorine, total residual	R	0	2		C3 DAILY MX	.09 mg/l	80%	<=.05 mg/l		

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. **X**) indicate the NODI code will not automatically resolve RNC.
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

NPDES ID(s): ID0021288
State: ID
Major/Minor Indicator:
Violation Date: 06/01/2018 - 06/01/2023
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/15/2023
Report Version 1.5, Modified: 1/4/2017

ID0021288

Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	02/29/2020	001-A	81010 - BOD, 5-day, percent removal	K	0	1		C1 MN % RMV	80 %	33%	>=85 %		
E90	12/31/2019	001-A	00530 - Solids, total suspended	1	0	1		C2 MO AVG	123 mg/l	173%	<=45 mg/l		
E90	12/31/2019	001-A	00530 - Solids, total suspended	1	0	1		C3 WKLY AVG	123 mg/l	89%	<=65 mg/l		
E90	12/31/2019	001-A	81011 - Solids, suspended percent removal	K	0	1		C1 MN % RMV	44 %	60%	>=65 %		
E90	05/31/2019	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	1		Q1 MO AVG	49 lb/d	63%	<=30 lb/d		
E90	05/31/2019	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	1		Q2 WKLY AVG	49 lb/d	9%	<=45 lb/d		
E90	05/31/2019	001-B	50060 - Chlorine, total residual	1	0	2		Q2 DAILY MX	.28 lb/d	180%	<=.1 lb/d		
E90	04/30/2019	001-A	00530 - Solids, total suspended	1	0	1		Q1 MO AVG	72.5 lb/d	61%	<=45 lb/d		
E90	04/30/2019	001-A	00530 - Solids, total suspended	1	0	1		Q2 WKLY AVG	72.5 lb/d	12%	<=65 lb/d		
E90	04/30/2019	001-A	00530 - Solids, total suspended	1	0	1		C2 MO AVG	54 mg/l	20%	<=45 mg/l		
E90	04/30/2019	001-A	81010 - BOD, 5-day, percent removal	K	0	1		C1 MN % RMV	77 %	53%	>=85 %		
E90	04/30/2019	001-B	50060 - Chlorine, total residual	1	0	2		Q1 MO AVG	.3 lb/d	200%	<=.1 lb/d		
E90	04/30/2019	001-B	50060 - Chlorine, total residual	1	0	2		Q2 DAILY MX	.22 lb/d	120%	<=.1 lb/d		
E90	06/30/2018	001-A	00400 - pH	1	0			C3	9.08		<=9		

Schedule Violations

Violation Code	Sch. Event Code	Schedule Date	Actual Date	Report Received Date	EA Identifier	Sch. Num.	Sch. Type	Schedule Event/ Comments	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
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NPDES ID(s): ID0021288
State: ID
Major/Minor Indicator:
Violation Date: 06/01/2018 - 06/01/2023
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/15/2023
Report Version 1.5, Modified: 1/4/2017

ID0021288										
Schedule Violations										
Violation Code	Sch. Event Code	Schedule Date	Actual Date	Report Received Date	EA Identifier	Sch. Num.	Sch. Type	Schedule Event/ Comments	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
C40	50108	12/31/2020	03/23/2021	03/23/2021		1	P	Operation and Maintenance (O&M) Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.A of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.	N 01/31/2021	2 03/23/2021
C30	50108	12/31/2020	03/23/2021	03/23/2021		1	P	Operation and Maintenance (O&M) Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.A of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.	N 01/31/2021	2 03/23/2021
C20	50108	12/31/2020	03/23/2021	03/23/2021		1	P	Operation and Maintenance (O&M) Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.A of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.		
C10	50108	12/31/2020	03/23/2021	03/23/2021		1	P	Operation and Maintenance (O&M) Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.A of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.		
C40	55099	12/31/2020	03/23/2021	03/23/2021		1	P	Quality Assurance Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.B of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.	N 01/31/2021	2 03/23/2021

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. **X**) indicate the NODI code will not automatically resolve RNC.
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

NPDES ID(s): ID0021288
State: ID
Major/Minor Indicator:
Violation Date: 06/01/2018 - 06/01/2023
Violation Type(s):

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ID0021288										
Schedule Violations										
Violation Code	Sch. Event Code	Schedule Date	Actual Date	Report Received Date	EA Identifier	Sch. Num.	Sch. Type	Schedule Event/ Comments	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
C30	55099	12/31/2020	03/23/2021	03/23/2021		1	P	Quality Assurance Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.B of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.	N 01/31/2021	2 03/23/2021
C20	55099	12/31/2020	03/23/2021	03/23/2021		1	P	Quality Assurance Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.B of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.		
C10	55099	12/31/2020	03/23/2021	03/23/2021		1	P	Quality Assurance Report Comment: The permittee must provide EPA and Nez Perce Tribe with written notification that the Plan has been developed and implemented (see Part II.B of this permit). The Plan must be kept on site and made available to EPA and Nez Perce Tribe upon request.		
C40	ERPMP	12/31/2020	03/23/2021	03/23/2021		1	P	Emergency Response and Public Notification Plan Comment: The permittee must develop and implement an overflow emergency response and public notification plan. The permittee must submit written notice to EPA and Nez Perce Tribe that the plan has been developed and implemented within 180 days of the effective date of this permit. (See Part II.F. of this permit)	N 01/31/2021	2 03/23/2021

NPDES ID(s): ID0021288
State: ID
Major/Minor Indicator:
Violation Date: 06/01/2018 - 06/01/2023
Violation Type(s):

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ID0021288										
Schedule Violations										
Violation Code	Sch. Event Code	Schedule Date	Actual Date	Report Received Date	EA Identifier	Sch. Num.	Sch. Type	Schedule Event/ Comments	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
C30	ERPNP	12/31/2020	03/23/2021	03/23/2021		1	P	Emergency Response and Public Notification Plan Comment: The permittee must develop and implement an overflow emergency response and public notification plan. The permittee must submit written notice to EPA and Nez Perce Tribe that the plan has been developed and implemented within 180 days of the effective date of this permit. (See Part II.F. of this permit)	N 01/31/2021	2 03/23/2021
C20	ERPNP	12/31/2020	03/23/2021	03/23/2021		1	P	Emergency Response and Public Notification Plan Comment: The permittee must develop and implement an overflow emergency response and public notification plan. The permittee must submit written notice to EPA and Nez Perce Tribe that the plan has been developed and implemented within 180 days of the effective date of this permit. (See Part II.F. of this permit)		
C10	ERPNP	12/31/2020	03/23/2021	03/23/2021		1	P	Emergency Response and Public Notification Plan Comment: The permittee must develop and implement an overflow emergency response and public notification plan. The permittee must submit written notice to EPA and Nez Perce Tribe that the plan has been developed and implemented within 180 days of the effective date of this permit. (See Part II.F. of this permit)		
C20	CS032	06/20/2021	07/06/2021	07/08/2021		2	P	Other (See Comments) Comment:		
C10	CS032	06/20/2021	07/06/2021	07/08/2021		2	P	Other (See Comments) Comment:		

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RNC Detection Codes

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Violation Type	RNC Detection Code	RNC Detection Description
DMR Non-Receipt (D80, D90)	K	RPT - Non-receipt Violation, Non-Monthly Average
	N	RPT - Non-Receipt of DMR/Schedule Report
Effluent (E90)	A	ENF - Enforcement Order
	C	CHR - Chronic Violation
	H	CHR - Chronic Violation, Non-Monthly Average
	P	ENF - Enforcement Order, Non-Monthly Average
	R	TRC - TRC Limitations Exceeded, Non-Monthly Average
	T	TRC - TRC Limitations Exceeded
	U	EFF - Other Violation with TRC Non-Monthly Average
	V	EFF - Other Violation with TRC
	X	EFF - Manual Other Violation with TRC
	Y	TRC - Manual TRC
Schedule Violations (C10, C20, C30, C40)	Z	CHR - Manual Chronic
	N	SCH - Non-Receipt of DMR/Schedule Report
	S	SCH - Schedule Violation
Single Event	B	DIS - Manual 2A4 - Pass-Through
	D	DIS - Manual Other
	E	DIS - Manual 2F - Permit Narrative
	F	DIS - Manual 2G - Violation of Concern
	G	DIS - Manual 2A1 - Effluent Violation
	I	DIS - Manual 2A2 - Unauthorized Bypass
	J	DIS - Manual 2A3 - Unpermitted Discharge
	Q	DIS - Manual 2B - Pretreatment
	W	DIS - Manual 2E - Deficient Report

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RNC Resolution Codes

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RNC Resolution Status	RNC Resolution Code	RNC Resolution Description
Noncompliant (NC)	1	NC - Unresolved RNC
	A	NC - Manual Unresolved RNC
Resolved Pending (RP)	3	RP - Due to Formal Enforcement Action Final Order with Compliance Schedule
	4	RP - In Compliance with Formal Enforcement Action Final Order Requirement
	7	RP - Manual RP - In Compliance with Formal Enforcement Action Order Requirement
	8	RP - Manual Due to Formal Enforcement Action Formal Order
Resolved (RE)	0	RE - Automated Administratively Resolved (DMR Non-Receipt Violations)
	2	RE - Back into Compliance
	5	RE - Resolved RP by NPDES Closure of Enf. Action Final Order with Comp. Schedule
	6	RE - Manual Resolution by Enforcement Action
	9	RE - Manual by Back into Compliance/Administratively Resolved
	B	RE - Manual by EPA/State/Tribal Action

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NODI Codes

NODI Code	Acceptable?	NODI Description
2	Y	Operation Shutdown
3	Y	Special Report Attached
6	N	State-specific No Data Indicator - Invalid
7	Y	No Influent
9	Y	Conditional Monitoring - Not Required This Period
A	Y	General Permit Exemption
B	Y	Below Detection Limit/No Detection
C	Y	No Discharge
E	N	Failed to Sample/Required Analysis Not Conducted
F	Y	Insufficient Flow for Sampling
I	Y	Land Applied
N	Y	Not Constructed
P	N	Laboratory Error or Invalid Test
Q	Y	Not Quantifiable
R	Y	Administratively Resolved
T	Y	Environmental Conditions - Monitoring Not Possible
W	Y	Dry Lysimeter/Well
X	N	Parameter/Value Not Reported
Y	Y	State-specific No Data Indicator - Valid

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DMR Violation Codes

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Violation	Violation Code	Violation Indicator Type
DMR Non-Receipt Violation	D80	DMR, Monitor Only - Overdue
	D90	DMR, Limited - Overdue
Effluent Violation	E90	DMR, Limited - Numeric Violation

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Schedule Violation Codes

Violation	Violation Code	Violation Indicator Type
Schedule Violation	C10	Schedule Event reported late
	C20	Schedule Event achieved late but reported
	C30	Schedule Event unachieved but reported
	C40	Schedule Event unachieved and not reported

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Monitoring Location Codes

Monitoring Location Codes	Monitoring Location Description
0	Intake
1	Effluent Gross
2	Effluent Net
3	Intake Public Water
4	Pretreatment, Process Complete
5	Upstream Monitoring
6	Downstream Monitoring
7	Intake from Stream
8	Other Treatment, Process Complete
9	Phosphate Removal, Process Complete
A	Disinfection, Process Complete
AP	Alternate Process
B	Prior to Disinfection
C	Nitrogen, Removal Complete
CA	Calculated Adjusted
D	Tertiary/Advanced Process Complete
E	Secondary/Biological Process Complete
E1	Effluent Option 1
E2	Effluent Option 2
E3	Effluent Option 3
EA	Effluent Adjusted Value
ED	Effluent w/additives
EG	Effluent Gross
F	Primary/Preliminary Process Complete
G	Raw Sewage Influent
GW	Groundwater
H	During Manufacturing
I	Intake from Well
II	Industrial Influent
IM	Internal Monitoring Point
IN	Allowed Increase
J	Intermediate Treatment, Process Complete
K	Percent Removal
L	Digester
LA	Land Application Soil
N	In Aeration Unit
O	See Comments
P	See Comments
PI	Prior to Irrigation
PR	Prior to Reuse
PT	Precipitation
Q	See Comments
R	See Comments
RS	Beneficial Reuse
RW	Receiving Water
S	See Comments
SC	See Comments
SD	Sediment
SL	Sludge
SW	Storm Water
T	See Comments
U	See Comments
V	See Comments

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Monitoring Location Codes

Monitoring Location Codes	Monitoring Location Description
W	See Comments
X	End of Chlorine Contact Chamber
Y	Effluent Gross (Supplementary)
Z	Instream Monitoring