

INSPECTION REPORT

Inspection Entry Date/Time	03/20/2023 9:10 AM (PT)	Announced: No	
Inspection Exit Date/Time	03/20/2023 12:30 PM (PT)	Access: Granted	
Weather	40°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	City of Genesee		
Facility or Site Name	Genesee WWTP		
Facility Physical Address	Cow Creek Rd & Morscheck Rd		
City, State, Zip Code	Genesee, Idaho 83832		
County	Latah		
Facility GPS Coordinates	46.5413, -116.941432		
Mailing Address	P.O. Box 38		
City, State, Zip Code	Genesee, Idaho 83832		
FRS ID	110039696255		
Permit Number	ID0020125		
SIC	4952 (Sewage Systems)		
Lead Inspector:			
RAYMOND ANDREWS		Digitally signed by RAYMOND ANDREWS Date: 2023.05.22 10:02:18 -07'00'	
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
PETER CONTRERAS		Digitally signed by PETER CONTRERAS Date: 2023.05.22 10:11:23 -07'00'	
Peter Contreras	EPA Region 10	Contreras.peter@epa.gov	(206) 553-6708

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

I arrived at the City of Genesee WWTP (“Facility”), located at Cow Creek Rd & Morscheck Rd, Genesee, Idaho, at 9:10am on 03/20/2023 for an unannounced inspection. I presented my credentials to Dustin Brinkley and informed him 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 Section 308 of the Clean Water Act (CWA) Section 308 the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # ID0020125. This report is based on information supplied by Mr. Dustin Brinkly, the City Public Works Director, direct observations I made, 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 Genesee	Dustin Brinkly	Public Works Director	Yes	Yes

Facility/Site Information

What is the facility’s service population?	The facility has a service population of 1,051 people with a total of 394 service connection.
How many employees does the facility have?	The facility has two employees, Mr. Brinkly, who holds a Class 2 Wastewater Treatment certification, and James Mader. Mr. Mader was uncertified at the time of the inspection.
When is the facility staffed?	The facility is staffed 7:30am until 4:30pm, Monday through Friday. On Saturday and Sunday, either Mr. Brinkly, or Mr. Mader, conducts a check on the pumps and aerators which take approximately 30 minutes.
How many outfalls does the facility have?	The facility discharges through a single outfall. The facility discharges into Cow Creek which enters Union Flat Creek which is a tributary of the Palouse River.
How often does the facility discharge?	The facility discharges daily from December through April. The facility is permitted to land apply from May through October. The facility does not discharge in November.
What is the design flow of the facility?	0.15 MGD
What is the average daily flow?	0.13 MGD
Does the facility treat anything other than domestic sewage?	The facility does not accept any waste other than domestic sewage.
Explain the facility’s treatment process.	The sewage first enters a grinder at the headworks, then proceeds to a lift station which moves the influent to a single aerated lagoon. From the lagoon, the influent enters a chlorine contact chamber. Prior to discharge, the effluent passes through dechlorination.
Where does the facility collect in fluent and effluent samples?	Influent samples are collected from a manhole located prior to the lift station. Effluent samples are collected at the point of discharge.

Which parameters does the facility monitor?	Per the permit, the facility monitors <i>E. coli</i> , total residual chlorine, ammonia, phosphorus (summer), temperature, pH, biological oxygen demand (BOD), and total suspended solids (TSS).
Who conducts the sampling?	Dustin Brinkly draws both the influent and effluent samples.
Does the facility conduct its own analysis?	Most sampled parameters are analyzed by a contract lab. Anatek Labs, Inc. – Moscow 1282 Alturas Drive Moscow, Idaho 83843 (208) 883-2839
Is the facility sampling more frequently than required?	The facility does sample more frequently than required by the Permit. Additional samples are factored into the results reported on the Discharge Monitoring Reports (DMRs).
Does the facility analyze any parameters?	Due to the 15-minute hold time, pH is analyzed by the facility at the time of sample collection. pH is monitored using a digital pH meter which the facility calibrates prior to each use.
Has the facility violated a daily maximum, or monthly average, limit?	The facility violates a daily maximum or monthly average about 3 times a year. The facility frequently exceeds the monthly averages of biochemical oxygen demand (BOD) and total suspended solids (TSS).
To whom was the exceedance reported?	Exceedances are reported on DMRs.
Has the facility been changed or upgraded in the last 5-years?	Yes. The facility added aeration to its lagoon in 2020.
Are any upgrades planned at the facility?	The City has sent out a notice requesting bids for construction of a new wastewater treatment plant.

SECTION II – OBSERVATIONS

Location: Outfall

Observation #: RA1-OB-001

Date: 03/20/2023

Weather: 40°F, Overcast

Around the discharge pipe at the outfall, there appeared to be areas of foamy bubbles. In addition to the bubbles, there was a turbid plume leading from the outfall that was noticeably darker than the ambient water in the creek.



SECTION III – RECORDS REVIEW

Record: Other - EPA's Integrated Compliance Information System Database		AOC: Yes
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 05/11/2023
Upon review of data in EPA's Integrated Compliance Information System (ICIS) database from 5/1/2018 – 4/30/2023, I found the facility had a total of 1,811 effluent exceedances between 5/1/2018 and 4/30/2023.		
Record: Discharge Monitoring Reports (DMRs)		AOC: Yes
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 05/11/2023
Upon review of data in EPA's ICIS database from 5/1/2018 – 4/30/2023, I found the facility was late in submitting two Discharge Monitoring Reports (DMRs), submitted two incomplete DMRs, and one DMR was "administratively resolved".		
Record: Other - Compliance Order on Consent and Compliance Agreement Schedule		AOC: Yes
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 05/11/2023
Upon review of data in EPA's ICIS database from 12/1/2018 – 4/28/2023, I found the facility was late in submitting 10 scheduled documents. The facility also failed to submit one other scheduled document.		

SECTION IV - AREAS OF CONCERN

AOC Reference #: RA1-RR-001	Records Review: Other - Compliance Order on Consent and Compliance Agreement Schedule
Regulation and/or Permit Requirement	
Part I.B.3.d, “Use the temperature device manufacturer’s software to generate (export) an Excel or electronic ASCII text file. The file must be submitted annually to the EPA and IDEQ by January 31 for the previous monitoring year along with the placement log.” Permit Part II.C.4, “The permittee must submit an Annual Report of Progress which outlines the progress made towards reaching the compliance date for the ammonia effluent limitations. The annual Report of Progress must be submitted by July 20th of each year. The first report is due July 20th, 2018, and annually thereafter, until compliance with the ammonia effluent limits is achieved.” Permit Part II.E.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 within two years following the effective date of the NPDES permit.” Permit Part I.C.7.a, “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 January 31st of the following year and if applicable, with the application (see Part V.B of this permit, Duty to Reapply)”	
AOC:	
The facility did not meet submission requirements for 11 scheduled documents. Ten documents were submitted late, and one was not submitted.	
<u>Late</u> • Annual Reports of Progress – 3 • Surface Water Monitoring Reports – 3 • Effluent Monitoring Reports – 2 • Industrial User Report – 1 • Facility Plan – 1	
<u>Not Submitted</u> • Annual Report of Progress – 1	
A table of the late and missing documents is in Appendix II.	

AOC Reference #: RA1-RR-002	Records Review: DMR Reports
Regulation and/or Permit Requirement	
Permit Part III.B.1 , “Monitoring data must be submitted electronically to EPA no later than the 20th of the month following the completed reporting period. All reports required under this permit must be submitted to EPA as a legible electronic attachment to the DMR.”	
AOC:	
The facility was late in submitting two Discharge Monitoring Reports (DMRs). The facility also submitted two incomplete DMRs, and one DMR was "administratively resolved".	
A table of the DMRs is in Appendix II .	
AOC Reference #: RA1-RR-003	Records Review: Other - EPA's ICIS Database
Regulation and/or Permit Requirement	
Permit Part I.B.1 , “The permittee must limit and monitor discharges from outfall 001 as specified in Table 1.”	
AOC:	
I found the facility had a total of 1,811 effluent exceedances between 5/1/2018 and 4/30/2023.	
A table of effluent exceedances is in Appendix II .	
AOC Reference #: RA1-OB-001	Location: Outfall
Regulation and/or Permit Requirement	
Permit Part I.B.4.a , “The permittee must not discharge floating, suspended, or submerged matter of any kind in concentrations causing nuisance or objectionable conditions or that may impair designated beneficial uses.	
AOC:	
Around the discharge pipe at the outfall, I observed what appeared to be areas of foamy bubbles. In addition to the bubbles, there was a plume leading from the outfall that was noticeably darker than the ambient water in the creek.	

SECTION V – CLOSING CONFERENCE

I held a closing conference with Mr. Brinkly at 12:30 PM (PT) on 03/20/2023. During the conference, I discussed the 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

P1010592 – Manhole prior to Lift Station, influent sampling point, closed
P1010593 – Manhole prior to Lift Station, influent sampling point, open
P1010594 – Lift Station (L)/Grinder (R)
P1010595 – Grinder, interior
P1010596 – Lift Station, interior
P1010597 – Lagoon, photo 1
P1010598 – Lagoon, photo 2
P1010599 – Lagoon, photo 3
P1010600 – Chlorine Contact Chamber, photo 1
P1010601 – Chlorine Contact Chamber, photo 2
P1010602 – Chlorine Contact Chamber, photo 3
P1010603 – V-Notch Weir, photo 1
P1010604 – V-Notch Weir, photo 2
P1010605 – Flow Meter Recording Box
P1010606 – Outfall, photo 1
P1010607 – Outfall, photo 2

APPENDIX II: Areas of Concern Tables

Scheduled Submission Areas of Concern

Schedule Event	Schedule Date	Received Date	Citation	Status
Annual Report of Progress	7/20/2018	6/11/2020	Part II.C.4	Late
Effluent Monitoring Report	1/31/2019	6/16/2020	Part I.B.3.d	Late
Surface Water Monitoring Report	1/31/2019	6/12/2020	Part I.C.7.a	Late
Industrial User Report	7/1/2019	6/11/2020	Part II.E	Late
Annual Report of Progress	7/20/2019	6/11/2020	Part II.C.4	Late
Surface Water Monitoring Report	1/31/2020	6/15/2020	Part I.C.7.a	Late
Facility Evaluation Plan	3/31/2020	4/24/2020	Compliance Order, Paragraph 3.1.1	Late
Annual Report of Progress	7/20/2020	10/14/2021	Part II.C.4	Late
Effluent Monitoring Report	1/31/2021	10/14/2021	Part I.B.3.d	Late
Surface Water Monitoring Report	1/31/2021	10/14/2021	Part I.C.7.a	Late
Annual Report of Progress	7/20/2022		Part II.C.4	Not Received

Discharge Monitoring Reports Areas of Concern

Monitoring Period End	Due Date	Received	Notes
6/30/2019	7/20/2019		Incomplete. DMR was missing data for: Dissolved oxygen; Nitrogen; ammonia total [as N]; Nitrogen, Kjeldahl, total [as N]; Nitrite + Nitrate total [as N]; Phosphorus, total [as P]; Oil & Grease; Chlorine, total residual; and Solids, total dissolved.
8/31/2019	9/20/2019	11/12/2019	Late. NODI Code "C" - "No Discharge" used.
6/30/2020	7/20/2020	8/20/2021	Administratively Resolved. NODI Code "E" - "Failed to Sample/Required Analysis Not Conducted" used.
6/30/2021	7/20/2021		Incomplete. Administratively Resolved on 8/20/2022; Facility failed to submit data for: Chlorine, total residual; and Solids, total dissolved.
1/31/2023	2/20/2023	4/3/2023	Late. Facility was late in submitting data for: Nitrogen, ammonia total [as N]

Effluent Exceedances

Month	Parameter	DMR Value	Permit Limit	Unit	Limit Type	# Violations
Dec 2018	BOD ₅ , 20°C	39.9	30	mg/L	Mo Avg	31
Dec 2018	BOD ₅ , 20°C	59.9	38	lb/d	Mo Avg	31
Dec 2018	BOD ₅ , 20°C	59.9	56	lb/d	Wkly Avg	7
Dec 2018	TSS	63.1	56	lb/d	Mo Avg	31
Dec 2018	BOD ₅ ,% rmv	80.8	85	%	Mo Av Mn	31
Feb 2019	BOD ₅ , 20°C	39.7	30	mg/L	Mo Avg	28
Feb 2019	BOD ₅ , 20°C	39.8	38	lb/d	Mo Avg	28
Feb 2019	<i>E. coli</i>	1600	576	#/100mL	Inst Max	1
Feb 2019	BOD ₅ ,% rmv	68	85	%	Mo Av Mn	28
Feb 2019	TSS, % rmv	58	65	%	Mo Av Mn	28
Mar 2019	BOD ₅ , 20°C	52.55	38	lb/d	Mo Avg	31
Mar 2019	BOD ₅ , 20°C	63	30	mg/L	Mo Avg	31
Mar 2019	BOD ₅ , 20°C	63	45	mg/L	Wkly Avg	7
Mar 2019	BOD ₅ ,% rmv	73	85	%	Mo Av Mn	31

Month	Parameter	DMR Value	Permit Limit	Unit	Limit Type	# Violations
Apr 2019	BOD ₅ ,% rmv	78	85	%	Mo Av Mn	30
Dec 2019	BOD ₅ , 20°C	31.5	30	mg/L	Mo Avg	31
Dec 2019	TSS	50	45	mg/L	Mo Avg	31
Dec 2019	BOD ₅ ,% rmv	73	85	%	Mo Av Mn	31
Jan 2020	BOD ₅ , 20°C	43.2	30	mg/L	Mo Avg	31
Jan 2020	TSS	54	45	mg/L	Mo Avg	31
Jan 2020	BOD ₅ ,% rmv	77	85	%	Mo Av Mn	31
Feb 2020	BOD ₅ , 20°C	31.9	30	mg/L	Mo Avg	29
Feb 2020	BOD ₅ , 20°C	55.9	38	lb/d	Mo Avg	29
Feb 2020	TSS	59	45	mg/L	Mo Avg	29
Feb 2020	TSS	103.3	56	lb/d	Mo Avg	29
Feb 2020	TSS	103.3	81	lb/d	Wkly Avg	7
Feb 2020	BOD ₅ ,% rmv	81	85	%	Mo Av Mn	29
Mar 2020	BOD ₅ , 20°C	39.2	30	mg/L	Mo Avg	31
Mar 2020	BOD ₅ , 20°C	52.31	38	lb/d	Mo Avg	31
Mar 2020	TSS	98	45	mg/L	Mo Avg	31
Mar 2020	TSS	98	65	mg/L	Wkly Avg	7
Mar 2020	TSS	130.8	56	lb/d	Mo Avg	31
Mar 2020	TSS	130.8	81	lb/d	Wkly Avg	7
Apr 2020	BOD ₅ , 20°C	33.85	30	mg/L	Mo Avg	30
Apr 2020	pH	9.55	9	SU	Inst Max	1
Nov 2020	BOD ₅ , 20°C	33.7	30	mg/L	Mo Avg	30
Nov 2020	TSS	66	45	mg/L	Mo Avg	30
Nov 2020	TSS	66	65	mg/L	Wkly Avg	7
Nov 2020	TSS	71.56	56	lb/d	Mo Avg	30
Nov 2020	BOD ₅ ,% rmv	62	85	%	Mo Av Mn	30
Dec 2020	BOD ₅ , 20°C	35.8	30	mg/L	Mo Avg	31
Jan 2021	BOD ₅ , 20°C	31.8	30	mg/L	Mo Avg	31
Jan 2021	TSS	62.55	56	lb/d	Mo Avg	31
Jan 2021	TSS	75	45	mg/L	Mo Avg	31
Jan 2021	TSS	75	65	mg/L	Wkly Avg	7
Jan 2021	BOD ₅ ,% rmv	69.4	85	%	Mo Av Mn	31
Feb 2021	BOD ₅ , 20°C	38.5	30	mg/L	Mo Avg	28
Feb 2021	TSS	58.9	45	mg/L	Mo Avg	28
Mar 2021	BOD ₅ , 20°C	43.5	38	lb/d	Mo Avg	31
Mar 2021	pH	9.19	9	SU	Inst Max	1
Mar 2021	TSS	45.8	45	mg/L	Mo Avg	31
Mar 2021	TSS	68.76	56	lb/d	Mo Avg	31
Mar 2021	BOD ₅ ,% rmv	74	85	%	Mo Av Mn	31
Dec 2021	Ammonia	22	15	mg/L	Mo Avg	31

Month	Parameter	DMR Value	Permit Limit	Unit	Limit Type	# Violations
Dec 2021	Ammonia	25.69	19	lb/d	Mo Avg	31
Jan 2022	Ammonia	19.1	19	lb/d	Mo Avg	31
Jan 2022	Ammonia	20.9	15	mg/L	Mo Avg	31
Feb 2022	TSS, % rmv	41.5	65	%	Mo Av Mn	28
Feb 2022	Ammonia	17.93	15	mg/L	Mo Avg	28
Mar 2022	pH	9.51	9	SU	Inst Max	1
Apr 2022	Ammonia	21.1	19	lb/d	Mo Avg	30
Jun 2022	Phosphorus	6.18	2	lb/d	Mo Avg	30
Jun 2022	Phosphorus	6.18	4	lb/d	Wkly Avg	7
Nov 2022	Ammonia	20.7	15	mg/L	Mo Avg	30
Nov 2022	Ammonia	22.4	19	lb/d	Mo Avg	30
Dec 2022	Ammonia	21.2	19	lb/d	Mo Avg	31
Dec 2022	Ammonia	21.7	15	mg/L	Mo Avg	31
Jan 2023	Ammonia	17.6	15	mg/L	Mo Avg	31
Jan 2023	Ammonia	26.4	19	lb/d	Mo Avg	31
Feb 2023	BOD ₅ , % rmv	71.2	85	%	Mo Av Mn	28