

INSPECTION REPORT

Inspection Entry Date/Time	06/03/2024 09:00 AM (PT)	Announced: Yes	
Inspection Exit Date/Time	06/03/2024 01:30 PM (PT)	Access: Granted	
Weather	50°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	City of Ketchikan		
Facility Name	Charcoal Point WWTP		
Facility Address	3921 Tongass Ave		
City, State, Zip Code	Ketchikan, Alaska 99901		
Borough	Ketchikan Gateway		
Facility GPS Coordinates	55.356953, -131.696465		
FRS ID	110039716144		
Permit Number	AK0021440		
SIC	4952 (Sewerage Systems)		
Lead Inspector:			
RAYMOND ANDREWS		Digitally signed by RAYMOND ANDREWS Date: 2024.07.23 13:18:49 -07'00'	
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
PETER CONTRERAS		Digitally signed by PETER CONTRERAS Date: 2024.07.23 13:21:00 -07'00'	
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Charcoal Point WWTP (the “Site” or “Facility”), located at 3921 Tongass Ave, Ketchikan, Alaska, at 09:00 AM (PT) on 06/03/2024 for an announced inspection. I was accompanied by Katrina Chambon, an Inspector in Training, who was there to observe inspection procedures. I presented my credentials to Amanda Robinson and informed her I was there to determine compliance with the Clean Water Act (CWA), and the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # AK0021440. This report is based on information supplied by facility representatives, direct observations made by me, and records and reports maintained by the facility. In addition, information gathered prior to, or after, the Inspection 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
EPA REGION 10	Katrina Chambon	Inspector	Yes	Yes
City of Ketchikan	Amanda Robinson	Assistant Public Works Director	Yes	Yes
City of Ketchikan	Mike McMahon	Senior Operator	Yes	Yes

Facility Information:

Responsible official?	Dave Kiffer, Mayor; davidkiffer@ketchikan.gov
What is the facility's service population?	The facility serves a population of approximately 8,000. There are no shared jurisdictions.
What is the facility's operation schedule?	The facility is fully staffed Monday through Friday from 7a - 4:30p. There is an on-call operator on duty evenings, weekends, and holidays.
How many employees does the facility have?	The facility has seven employees including Mike McMahon, the Senior Operator. Mr. McMahon holds a Level 2 certification in both Treatment and Collections. Collectively, the other six employees hold the following certifications, three Level 1 Treatment; two Level 2 Treatment; four Level 1 Collections; and two Level 2 Collections.
What is the facility's design capacity and average daily flow?	The facility has a design flow of 4 million gallons per day (mgd). The average daily flow is approximately 3mgd.
Describe the facility's flow path.	The influent enters three 25-inch diameter by 72-inch-long rotary screens with 0.04-inch openings. Once the influent has been screened, it enters one of four sedimentation tanks with an effective area of 5,000 ft ² . Once solids have settled out of the influent, it is discharged into the Tongass Narrows. The sludge from the sedimentation tanks is aerated and dewatered using a belt filter press after stabilization with hydrated lime (CaOH). The sludge is then sent to the Deer Mountain landfill where it is composted and used as cover.
What is the facility's receiving water?	Tongass Narrows
How many outfalls does the facility have?	The facility only has one outfall.
How often are the outfalls visually inspected?	The outfall is over 100 feet deep in Tongass Narrows. The facility contracts a diver to periodically inspect the outfall. The last dive inspection was 2017.

Where do you sample influent? Effluent?	The facility samples influent prior to the waste stream entering the rotating screens. The effluent is sampled after the wastewater has passed through the sedimentation chambers, and prior to discharge.
Are there any industrial users?	There are no industrial users.
Does the facility accept waste from septage haulers?	The facility does not accept waste from septage haulers but does occasionally accept waste from ships that are in dock for repairs.
How are biosolids managed?	Sludge is collected and dewatered through a filter press and auger screw. Lime is then added to the sludge. The sludge is then loaded onto trucks and taken away for land application.
Does the facility have a failure alarm?	The facility has a Supervisory Control and Data Acquisition (SCADA) system that monitors the treatment plant processes. If the SCADA detects a failure, a notification is sent to the Public Works Director and the Lead Operator.
Does the facility have back-up power?	The facility has a back-up generator which powers the entire facility in the event of a power outage. Back-up power activates automatically when a loss of power is detected.
What form does the overflow capacity take?	The facility uses one of its 4 sedimentation tanks for overflow and it has a capacity of approximately 115,000 gallons.
How often is the primary flow measuring device calibrated?	The facility's primary flow measuring device is the UltraMag electromagnetic flow meter. It is built into the pipes and has never been calibrated.
Has the facility had any bypasses or hydraulic overloads in the past 5-years?	The facility has not had any bypasses or hydraulic overloads in the last 5-years.
Are water samples analyzed in-house or sent out to a contract laboratory?	The facility analyzes most parameters in-house. A contract lab conducts analysis for zinc and copper. The Contract Lab is: Waterlab Corp. 2603 12th Street Salem, Oregon 97302 (503) 363-0473
Has the facility been upgraded in the last 5-years?	The facility has not been upgraded in the last 5-years. The facility is in the planning stages of replacing its belt press.

SECTION II – Observations

I did not observe anything that would constitute an area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - Quality Assurance (QA) Plan		AOC: No
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 07/18/2024
Post inspection, I reviewed the facility's QA Plan. The Plan the facility sent me was in Word format with a revision date of June 12, 2024. The QA Plan was not signed in accordance with permit requirements.		

Record: Other - Laboratory Reports and Chain of Custody Documents		AOC: No
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 07/18/2024
Post inspection, I reviewed the facility's laboratory reports and chain of custody documents for sample analyses conducted between June 2019 and May 2024. I did not note any areas of concern.		
Record: Other - Nonindustrial Source Control Program Annual Reports		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 06/03/2024
At the time of the inspection, I reviewed the facility's 2019 - 2023 Nonindustrial Source Control Program Annual Reports. I did not note any areas of concern.		
Record: Other - Dive Report		AOC: No
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 06/03/2024
At the time of the inspection, I reviewed the Dive Report for an underwater survey and assessment dive conducted in 2017. I did not note any areas of concern.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 06/03/2024
At the time of inspection, I reviewed information in EPA's ICIS database covering the period from June 2019 through May 2024. The facility did not have any effluent exceedance violations and I did not note any other areas of concern.		
Record: Other - Annual Reports		AOC: No
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 06/03/2024
At the time of the inspection, I reviewed the facility's 2020 - 2022 Annual Reports. The reports appeared to meet the requirements of the permit.		
Record: Other - Integrated Compliance Information System (ICIS) Database		AOC: No
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 06/03/2024
During the inspection, I reviewed data in EPA's ICIS database for the period from June 2019 through May 2024. I did not note any areas of concern.		

SECTION IV – Sampling Activity

No sampling was conducted.

SECTION V – Areas of Concern

AOC Reference #: RA1-RR-007	Records Review: Other - Quality Assurance (QA) Plan
Permit Requirements Part I.B.6.a of the permit states, in part, "Within 120 days of the effective date of this permit, the permittee shall submit to the EPA and ADEC...a Monitoring Program Plan that includes a Quality Assurance/Quality Control (QA/QC) program. Part IV.I.1.c of the permit states, in part, "Signatory Requirement. All applications, reports or information submitted to the Director and ADEC shall be signed and certified." Part IV.J. of the permit states, in part, "Certification. Any person signing a document under this section shall make the following certification: "I certify under penalty of law that this document and all attachments were prepared under my direction..."	
AOC: The QA Plan was not signed in accordance with permit requirements.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 01:30 PM (PT) on 06/03/2024 for the inspection. During the closing conference, I discussed my observations and any Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Observation or Area of Concern are included in the inspection report.

- **P1010929** – pH Calibration Log, photo 1
- **P1010930** – pH Calibration Log, photo 2
- **P1010931** – pH Calibration Log, photo 3
- **P1010932** – Flow Log Sheet
- **P1010933** – pH and Temperature Bench Sheet
- **P1010934** – BOD Calculation Bench Sheet
- **P1010935** – Chain of Custody Document Example, dated May 2, 2024
- **P1010936** – Discharge Monitoring Report Example, dated May 2024, photo 1
- **P1010937** – Discharge Monitoring Report Example, dated May 2024, photo 2
- **P1010938** – Discharge Monitoring Report Example, dated May 2024, photo 3
- **P1010939** – Laboratory Oven, photo 1
- **P1010940** – Laboratory Oven, photo 2
- **P1010941** – Laboratory Oven, photo 3
- **P1010942** – Laboratory Refrigerator, photo 1
- **P1010943** – Laboratory Refrigerator, photo 2
- **P1010944** – pH Meter & Probe
- **P1010945** – Influent Auto-sampler, photo 1
- **P1010946** – Influent Auto-sampler, photo 2
- **P1010947** – Influent Auto-sampler Control Panel
- **P1010948** – SCADA Control Screen
- **P1010949** – Influent Rotary Screen, 1 of 3 shown
- **P1010950** – Effluent Sampling Point Sign
- **P1010951** – Belt Filter Press, photo 1
- **P1010952** – Belt Filter Press, photo 2
- **P1010953** – Shore Sign, photo 1
- **P1010954** – Shore Sign, photo 2