

NPDES Inspection Report – Wastewater

National Database Information	
Inspection Date: July 14, 2021	Inspection Type: CEI - Wastewater Treatment Facility
Entry/Exit Time: 2:24 pm / 2:57 pm	NPDES ID Number: COG587102
NAICS Code: 221320	Inspection ID: 202107 COG587102
Lead inspector and affiliation: Emilio Llamozas / EPA Region 8	
Inspector and affiliation: Stephanie Meyers / EPA Region 8	

Facility Location Information (Name/Location/ Mailing Address)	
Site/Facility Name & Location: White Mesa Lagoon Beaver Lane White Mesa, Utah 84511	Mail Report to: Lee Trabaudo Public Works Director ltrabaudo@utemountain.org

Contact Information	
	Name(s)/Title
Facility Contacts: <i>(indicate primary lead and present during inspection)</i>	Starne Wall / Utility Manager / Ute Mountain Ute Tribe / primary lead during the inspection Lee Trabaudo / Public Works Director / Ute Mountain Ute Tribe / present during closing conference Scott Clow / Environmental Programs Director / Ute Mountain Ute Tribe / present during inspection Tony James / Brownfields Coordinator / Ute Mountain Ute Tribe / present during inspection
Person/Company meeting definition of “Operator”	Ute Mountain Ute Tribe
Authorized Official(s) (Per NOI)	Lee Trabaudo / Public Works Director / Ute Mountain Ute Tribe

Permit Information		
Is the permit on site and available? No	Lagoon Category: No Discharge	Monitoring Frequency: N/A
Effective Date: April 5, 2016	Expiration Date: December 31, 2020 (Administratively Continued)	Is the Facility under a compliance schedule? No
Is correct contact information indicated on ICIS? No	Indicate correct contact information: Lee Trabaudo, Public Works Director 970-749-6129	
Receiving Water(s): Unnamed tributary to Corral Draw		
Discharge point location (longitude, latitude): There was one outfall as described below:		
Outfall from Cell 1 – Southeast corner of cell 1 (photos 75 and 76). Lat. 37.46512° N, Long. -109.45955° W		
Regulatory Inspector’s source of information: Notice of Intent for the permit, permit, facility representatives and facility 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>	Laboratory	Stormwater
<u>Effluent/Receiving Waters</u>	<u>Operations and Maintenance</u>	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	<u>Sanitary Sewer Overflow</u>

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Emilio Llamozas	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/16/2021
	303-312-6407	
Reviewer Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/17/2021
	303-312-6938	
Supervisor Signature/Name	Address/Phone Number	Date
MICHAEL BOEGLIN Digitally signed by MICHAEL BOEGLIN Date: 2021.08.26 08:20:24 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/26/2021
	Michael Boeglin 303-312-6250	

Inspection Narrative and Site Description

The inspection was conducted at the White Mesa Lagoon (facility) located on the Ute Mountain Ute Reservation, in White Mesa, Utah to evaluate compliance with its National Pollutant Discharge Elimination System (NPDES) permit. The EPA is responsible for implementing the NPDES program in Indian Country within the State of Utah. The inspection was announced a few weeks prior to the inspection, to coordinate logistics for the inspection. On July 14, 2021, U.S. Environmental Protection Agency (EPA) inspectors Emilio Llamozas and Stephanie Meyers met with Starne Wall with the Ute Mountain Ute Public Works and Scott Clow and Tony James with the Ute Mountain Ute Environmental Department. The EPA inspectors presented their credentials and had an opening conference to explain the purpose of the inspection. The inspectors proceeded to inspect the facility and asked questions to the facility representatives to help the inspectors evaluate compliance with the facility's permit. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log.

The White Mesa wastewater treatment facility (facility) is owned and operated by the Ute Mountain Ute Tribe. The facility is located in the state of Utah, east of Highway 191 and approximately 75 miles west of Towaoc, Colorado. The facility serves the White Mesa community of approximately 250 people. Service connections include 73 homes and 6 businesses (travel center, tribal offices, and a health center).

The inspectors inspected the lagoon cells. The facility is a two cell lagoon system that serves the community of White Mesa. Wastewater via gravity flow during normal operations is diverted equally to cell 1 (photos 72 and 74) and cell 2 (photo 77). At the time of the inspection, the wastewater flow to cell 1 was blocked. The cells are not connected to each other so they operate in parallel. There is one outfall at the south east corner of cell 1 (photos 75 and 76). The facility is permitted as a no discharge facility, under the Lagoon General Permit for the Ute Mountain Ute Reservation. Any discharge from the facility is expected to be under emergency circumstances. The facility representative indicated that this facility has not had to discharge because it has sufficient capacity to contain the wastewater.

Recently, cells 1 and 2 of the previous three-cell lagoon systems were combined to make a larger cell which is now lined and called cell 1. Cell 3 from the previous lagoon system was lined and changed to cell 2.

Cell ID	Area (Square Feet)	Operating Depth (feet)	Operating Volume (MG)
Cell 1	115,869	5	4.3
Cell 2	136,342	5	5.1
Total	-	-	9.4

The inspectors and facility representatives walked around the interior of the lagoon enclosure to evaluate berm integrity and the facility's discharge status. The manhole that splits the wastewater flow equally to cell 1 and cell 2 had a blockage that was preventing wastewater flow to cell 1 (photos 72 and 73). All of the wastewater flow was going to cell 2. The approximate wastewater depth in cell 1 was 3 feet and the approximate wastewater depth in cell 2 was 3.5 feet. The blockage in the manhole line needs to be removed and the line needs to be jetted to ensure adequate flow to each cell. Cell 1 had vegetation and cattails growing in the southwest corner of the cell (photo 74). Cell 1 and cell 2 had

tumble weeds in the corners of the cells that need to be removed (photos 74 and 77). There was no lock on the gate at the east (back entrance) of the cells located near the outfall for cell 1.

At the end of the day, the inspectors returned to the main office and held a closing conference with Mr. Trabaudo where they discussed preliminary findings. Weekly lagoon inspections were not being conducted at this facility. On July 28, 2021, the EPA sent an email to Mr. Trabaudo with the preliminary findings from the inspection.

Findings, Corrective Actions and Recommendations

Finding #1: The manhole that splits the wastewater flow equally to cell 1 and cell 2 had a blockage.
The manhole that splits the wastewater flow equally to cell 1 and cell 2 had a blockage that was preventing wastewater flow to cell 1 (photos 72 and 73). All of the wastewater flow was going to cell 2. The approximate wastewater depth in cell 1 was 3 feet and the approximate wastewater depth in cell 2 was 3.5 feet. The blockage in the manhole line needs to be removed and the line needs to be jetted to ensure adequate flow to each cell.

Permit requirements:

Part 6.5 of the General Permit (Permit) states, “Proper Operation and Maintenance. The permittee shall 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.”

EPA Guidance:

EPA has developed guidance manuals on the proper operation and maintenance of sanitary collection systems. One of the guidance materials is called “Collection Systems O&M Fact Sheet Sewer Cleaning and Inspection” (September 1999, EPA 832-F-99-031). <https://www3.epa.gov/npdes/pubs/sewcl.pdf>

This guidance manual indicates on page 2 that:

“To maintain its proper function, a sewer system needs a cleaning schedule. There are several traditional cleaning techniques used to clear blockages and to act as preventative maintenance tools.”

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

<https://www.epa.gov/sites/production/files/2014-09/documents/lagoon-pond-treatment-2011.pdf>

This guidance manual indicates on page 9-12 that:

“9.4.2.3 Maintenance General maintenance guidelines:

- Inlet and outlet structures should be cleaned regularly to remove any floating debris, caked scum, or other trash that might produce odors or be unsightly.”

Corrective Action:

Remove the blockage in the manhole that is preventing wastewater from flowing into cell 1. Properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) including manholes and the collection system, which are installed or used by the permittee to achieve

compliance with the conditions of this permit. Provide the EPA, the Tribe and Indian Health Service (IHS) with photos and a description of the corrective actions taken to address this finding.

Finding #2: There was vegetation and cattails growing in and around the berms of cell 1.
Cell 1 had vegetation and cattails growing in the southwest corner of the cell (photo 74).

Permit Requirement:

Part 6.5 of the General Permit (Permit) states, "Proper Operation and Maintenance. The permittee shall 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance. In addition to the operation and maintenance items in the manual for the lagoon system, the permittee shall do the following maintenance:

- 6.5.1. Take necessary action to promptly correct the problem of leakage through the dikes;
- 6.5.2. Take necessary action to promptly remove burrowing animals from the dikes;
- 6.5.3. Promptly repair damage to dikes caused by burrowing animals and/or erosion;
- 6.5.4. Remove rooted plants, including weeds, from the water on a regular basis or as needed; and
- 6.5.5. Keep the dikes mowed on a regular basis during the growing season or as needed (e.g., keep growth below 6" in height)."

Corrective Action:

Remove the overgrown vegetation growing around cell 1. Submit to the EPA, the Ute Mountain Ute Tribe Environmental Department (Tribe), and IHS photos of the cells after the vegetation and trees have been removed.

Finding #3: There were tumbleweeds in cells 1 and 2.

Cell 1 and cell 2 had tumble weeds in the corners of the cells that need to be removed (photos 74 and 77).

Permit Requirement:

Part 6.5 of the General Permit (Permit) states, "Proper Operation and Maintenance. The permittee shall 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance."

Corrective Action:

Ensure that debris are removed from the cells on a routine basis. Properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) including lagoon cells,

which are installed or used by the permittee to achieve compliance with the conditions of the permit. Provide the EPA, the Tribe and IHS photos and a description of the corrective actions taken to address this finding.

Finding #4: There was no lock for the east gate to the lagoon.

There was no lock on the gate at the east (back entrance) of the cells located near the outfall for cell 1.

Permit requirements:

Part 6.5 of the General Permit (Permit) states, "Proper Operation and Maintenance. The permittee shall 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance."

EPA Guidance:

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

<https://www.epa.gov/sites/production/files/2014-09/documents/lagoon-pond-treatment-2011.pdf>

This guidance manual indicates on page 2-8 that:

"Gates should be of sufficient width to allow maintenance vehicles to enter the facility and should be provided with a lock."

Recommendation:

Lock the gate to the lagoon to prevent unauthorized personnel from using the lagoon without the Tribe's permission.

Finding #5: The facility did not have a copy of the Lagoon general permit on site.

A copy of the Lagoon general permit was not kept on site.

Permit requirements:

Part 5.7 of the permit states, "Data collected on site, data used to prepare the DMR, copies of DMRs, a copy of this NPDES permit, and the notice of intent for permit coverage, must be maintained on site."

Corrective Action:

Ensure that a copy of the Lagoon General permit is maintained on site. Provide the EPA, the Tribe and IHS with a description of the corrective actions taken to address this finding.

Finding #6: Inspection reports of the lagoon were not conducted.

Weekly lagoon inspections were not being conducted at this facility.

Permit requirement:

Part 4.3.1 of the permit states, "On at least a weekly basis, unless otherwise modified by written approval from the EPA, the permittee shall inspect its wastewater treatment facility. The permittee shall maintain a notebook recording all information obtained during the inspection. At a minimum, the notebook shall include the following:

- 4.3.1.1. Name of facility and permit number;
- 4.3.1.2. Date and time of the inspection;
- 4.3.1.3. Name of the inspector(s);
- 4.3.1.4. The facility's discharge status;
- 4.3.1.5. The flow rate of the discharge if occurring;
- 4.3.1.6. If a discharge is occurring, has occurred since the previous inspection, and/or if a discharge is likely to occur before the next inspection. (Note: If a discharge has occurred or is likely to occur before the next inspection, perform the appropriate monitoring and reporting requirements in Parts 3.2 and 5.4 of this permit if not already done.);
- 4.3.1.7. Is there is any leakage through the dikes;
- 4.3.1.8. Are there are any animal burrows in the dike;
- 4.3.1.9. Is there any erosion of the dikes (e.g., rills, cracks or other structural indications of erosion);
- 4.3.1.10. Are there are any rooted plants, including weeds growing in the water;
- 4.3.1.11. Does the vegetation growth on the dikes needs mowing (e.g. greater than 6" tall);
- 4.3.1.12. List the date scheduled for operation and maintenance procedures to be undertaken at the wastewater treatment facility.
- 4.3.1.13. Identification of operational problems and/or maintenance problems;
- 4.3.1.14. Recommendations, as appropriate, to remedy identified problems;
- 4.3.1.15. A brief description of any actions taken with regard to problems identified; and,
- 4.3.1.16. Other information, as appropriate.

The permittee shall maintain the notebook in accordance with required record-keeping items listed above and shall make the log available for inspection, upon request, by authorized representatives of the U.S. Environmental Protection Agency or the applicable Tribe (see Part 5.10 of this permit)."

Part 5.7 of the permit states, "The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, inspection records, notifications to the EPA per this permit, and DMRs, for a period of at least five years from the date of the sample, measurement, report, application or submittal. Records of monitoring required by this permit related to sludge use and disposal activities must be kept at least five years (or longer as required by 40 C.F.R. Part 503). This period may be extended by request of the Director at any time. Data collected on site, data used to prepare the DMR, copies of DMRs, a copy of this NPDES permit, and the notice of intent for permit coverage, must be maintained on site."

Corrective Action:

Ensure that inspections are conducted on a weekly basis and documented in accordance with the permit. Provide the EPA, the Tribe and IHS with a description of the corrective actions taken to address this finding.