

INSPECTION REPORT

Inspection Entry Date/Time	05/16/2023 10:29 AM (PT)	Announced: No	
Inspection Exit Date/Time	05/16/2023 01:50 PM (PT)	Access: Granted	
Weather	70°F, Cloudy		
Media	Water		
Statutes/Programs	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	City of Plummer		
Facility Name	City of Plummer WWTP		
Facility/Site Physical Address	324 Toetly Road		
City, State, Zip Code	Plummer, Idaho 83851		
County	Benewah		
Facility GPS Coordinates	47.34134, -116.87721		
Mailing Address	880 C Street, P.O. Box B		
City, State, Zip Code	Plummer, Idaho 83851		
FRS ID	IDT2774044995		
Permit Number	ID0022781		
SIC	4952 (Sewage Systems)		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the City Of Plummer Wastewater Treatment Facility (“Site” or “Facility”), located at 324 Toetly Road, Plummer, Idaho at 10:29 AM (PT) on 05/16/2023 for an unannounced inspection. I presented my credentials to Jason Wereley and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # ID0022281. At the time of the inspection, Mr. Wereley worked for E3 Consulting LLC as the City’s Wastewater Operations and Training Manager. This report is based on information supplied by Mr. Wereley, 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	Name	Title	Present at Opening	Present at Closing
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
E3 Consulting LLC	Jason Wereley	Operations and Training Manager	Yes	Yes

Facility Information

Responsible official	Chris Dohrman, Mayor, chris@cityofplummer.org
WWTP Design & Average Flow	The facility has a design flow of 0.32 million gallons per day (MGD), and an average monthly flow of 0.04 MGD.
Service Population	The facility’s service population is about 1,020 people with 557 service connections. Tribal residents or connections from tribal land comprise 173 connections.
Facility Employees	The facility has five employees rotating positions at the facility. The City has contracted E3 Consulting/Operations to train and oversee daily operations and process control of the facility. The facility’s three licensed operators are: Jason Wereley, Class III WWT Brock Morrow, Class IV WWTP Wesley Rice, Class I WWT.
Facility Hours of Operation	The facility is staffed eight hours/day, five days/week and with 24-hour emergency services. E3 Consulting provides a licensed charge operator 24-hours a day.
Outfalls	The facility discharges through a single outfall. The outfall is southwest of the facility. The effluent discharges through a perforated pipe into a rock filter wetland which drains to Plummer Creek. During summer months, the effluent flows another hundred feet before infiltrating into the dry streambed. The facility discharges 24-hour/day, five days/week.
What is the facility's receiving water?	This facility discharges into Plummer Creek, which is located within the Coeur d’Alene Tribe Indian Reservation. Plummer Creek flows into Chatcolet Lake which is a part of Lake Coeur d’Alene.
Explain the facility's wastewater treatment process.	The facility provides advanced treatment of wastewater using an extended aeration activated sludge process with an anaerobic tank and fermenter for biological phosphorus removal. After biological treatment, additional phosphorus removal is accomplished by the addition of ferric sulfate and filtration. The facility uses ultraviolet disinfection. Waste sludge is dewatered using belt filter presses. The facility installed a Huber screening system on September 11, 2013. The facility completed construction of an equalization basin in November 2019.

Sample Collection	Influent samples are collected by a Hach refrigerated composite sampler prior to the main lift station. Effluent samples are also collected by a Hach refrigerated composite sampler. Samples are collected after the water passes through the UV disinfection system. Both influent and effluent samples are time proportional. The samples are collected every Tuesday and transported to a state certified laboratory.
Sample Analysis	The facility conducts analysis for pH and temperature. All other parameters are analyzed by the contract laboratory: Accurate Testing Labs, LLC 7950 Meadowlark Way Coeur d' Alene, ID 83815 (208) 762-8378
Has the facility had any bypasses with in the last five years?	The facility has had approximately 10 bypasses within the last five years. The bypasses went into the designed overflow emergency lagoon.
What caused the bypasses?	The facility experiences flow increases during high precipitation events. This occurs when the region experiences a high influx of precipitation from rainstorms and fast snow melting events, which predominantly occur between December and April and is related to the facility's inflow & infiltration (I&I) issues.
Industrial Waste	The facility does not accept industrial waste.
Has the facility completed the upgrades required by the Compliance order?	Per Mr. Wereley, the facility has completed Section III, paragraphs 3.2 - 3.5 of the Compliance Order on Consent (COC). However, paragraph 3.5, with an extended completion date of October 1, 2019, does not appear to have been met. Paragraph 3.5 of the COC requires the facility to achieve compliance with permitted effluent limits. Effluent exceedances are explained in more detail below.
Are any more upgrades planned?	The facility is conducting a phosphorus study to determine other removal options. Facility engineers are in the process of reviewing records of data and violations for possible future upgrades.
How is I & I currently being addressed?	The I&I issues have been an on-going concern for years. The City continues to monitor, address, and fix I & I issues as funds become available.
How are phosphorus exceedances being addressed?	The facility is studying processes that could aid in further phosphorus reduction. Land application of effluent is also being considered to eliminate discharging during certain months of the year.
Is the facility planning any interim or long-term actions to come into compliance with phosphorus limits?	The City is studying the viability of land application for crop irrigation during months of low stream flow. The City has also applied for a grant from Idaho DEQ to fund a phosphorus reduction program. If this grant is received, the City will notify EPA and update their planning and timeline for long term phosphorus reduction. The City hopes to hear if they are awarded funding by July 31, 2023.

SECTION II – Observations

City of Plummer WWTP	AOC: Yes
Observation #: RA1-OB-001	
At the time of the inspection, I inspected the pH meter and calibration buffers used by the facility. The facility uses 7.0 and 10.0 buffer solutions for calibrating the pH meter. The pH 7.0 calibration buffer solution expired in January 2023.	

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - Wastewater Service Agreement Between the City of Plummer and the Coeur d'Alene Tribe		AOC: No
Ref #: RA1-RR-013	Reviewed By: Raymond Andrews	Reviewed Date: 06/26/2023
After the inspection, I reviewed the wastewater service agreement between the City and the Tribe, signed June 2017.		
The agreement stipulations include:		
- the City accepting domestic sewage from all tribal properties connected to the City's wastewater (WW) treatment system as of May 1, 2018; - the City allocating 50% of new, available capacity to tribal properties up to 100 connections; and - the City assessing the performance of the WW treatment system within six months of completion of the Indian Health Services (IHS) Equalization Basin Project. The purpose of the assessment would be to determine available excess capacity. The City would then issue an engineer's report. The City engineer's analysis will include such factors as inflow, infiltration, hydraulic capacity, and treatment capacity of the system to produce an estimate of excess capacity. Available excess capacity would be reevaluated on an annual basis and the City will maintain, and share with the Tribe, a declining balance report to document the remaining available capacity in the system. Excess capacity will be allocated on a first come, first served basis.		
Record: IDEQ Inspection Report		AOC: No
Ref #: RA1-RR-012	Reviewed By: Raymond Andrews	Reviewed Date: 06/26/2023
After the inspection, I reviewed the inspection report for a facility inspection conducted by the Idaho Department of Environmental Quality (IDEQ) on March 3, 2016.		

Record: Other - City of Plummer Inflow and Infiltration (I&I) Report			AOC: No
Ref #: RA1-RR-011	Reviewed By: Raymond Andrews	Reviewed Date: 06/26/2023	
After the inspection, I reviewed the Inflow and Infiltration (I&I) Report, prepared by HMM Engineering. It is unclear when the study was conducted, and the report written, because the cover page is initialed by the engineer with a date of June 24, 2022. The bottom of the Table of Contents page is dated June 2022. All subsequent pages are dated March 2020. The Report states the City "seeks to partner with the Stimson Lumber Company in a water reuse system that will aid in reducing phosphorus loads to Coeur d'Alene Lake...The City will nearly eliminate effluent discharge into Plummer Creek by allowing Stimson Lumber Company to supplement their mill's non-potable water supply with the City's treated municipal wastewater discharge. The City will design an infrastructure improvement project to redirect effluent that would typically flow into Plummer Creek to the Stimson Lumber Company water system. The City received a grant to fund this project." In March 2016, the Idaho Department of Environmental Quality (IDEQ) conducted an inspection of the facility. According to the inspection report, the City's Mayor at the time, Bill Weems, stated the City had received a \$400,000 grant from the Army Corps of Engineers "to fix I&I problems." Per an e-mail from Mr. Weresley received on June 29, 2023, the proposed collaboration between the City and Stimson Lumber Company was terminated because Stimson installed a well that met its water needs.			
Record: Other - Compliance Order on Consent (COC) Modification			AOC: No
Ref #: RA1-RR-010	Reviewed By: Raymond Andrews	Reviewed Date: 06/26/2023	
After the inspection, I reviewed the letter sent to the City of Plummer from the EPA's Enforcement and Compliance Assurance Division (ECAD) in response to the City's request for extensions of COC deliverables' due dates. The ECAD letter modified Section III of the COC as follows: 1. Section 3.2, the contract to construct the equalization project shall be awarded and the Respondent shall provide written notification of such award to the EPA by May 15, 2019. 2. Section 3.3, construction of the Facility upgrades including the equalization project shall begin, and the Respondent shall provide written notification of commencement of construction to the EPA by June 1, 2019. 3. Section 3.3, the Respondent shall complete the infiltration and inflow study and provide written notification to the EPA by August 1, 2019. As part of the study, the city must assess all roof drain and basement sump pump connections to the collection system. 4. Section 3.4, construction of the Facility upgrades including the equalization project shall be completed and the Respondent shall provide written notification of the completion to the EPA by September 1, 2019. 5. Section 3.5, the Respondent shall achieve compliance with the effluent limitations in the Permit and provide written notification to the EPA that Respondent has achieved compliance with the effluent limitations by October 1, 2019. The section numbers shown in the ECAD letter do not match the section numbers in the COC.			

Record: Other - EPA Compliance Order on Consent (COC)		AOC: Yes
Ref #: RA1-RR-009	Reviewed By: Raymond Andrews	Reviewed Date: 06/26/2023
As part of the inspection, I reviewed the Compliance Order on Consent (COC), which was signed by the City of Plummer's Mayor, William Weems, on July 13, 2017, and became effective upon signature by the Environmental Compliance and Assurance Division (ECAD) Director, Edward Kowalski, on September 11, 2017. The facility was originally required to accomplish certain activities by specified dates. After an extension request from the City, the due dates were extended. Below is a list of the tasks required to be accomplished by the specified dates. The extended dates are in parenthesis. 1. Award a contract to construct an equalization project and provide written notification to the EPA by December 31, 2017. (May 15, 2019) - Paragraph 3.2 of the COC. 2. Begin construction of facility upgrades including the equalization project and provide written notification to the EPA by May 31, 2018. (June 1, 2019) - Paragraph 3.3 of the COC. 3. Complete construction of facility upgrades including the equalization project and provide written notification to the EPA by July 31, 2018. (September 1, 2019). - Paragraph 3.4 of the COC. 4. Achieve compliance with the effluent limits in the permit and provide written notification to the EPA that compliance has been achieved by September 1, 2018. (October 1, 2019) - Paragraph 3.5 of the COC. The facility appears to have complied with paragraphs 3.2 - 3.4 of the COC. However, a review of the ICIS database effluent exceedance (E90) report shows the facility failed to meet the requirements of paragraph 3.5 of the COC. The facility was required to meet its effluent limits by October 1, 2019. The E90 report shows the facility was still violating its effluent limits in October 2019. In October 2019, the facility exceeded its phosphorus monthly average for both concentration and loading, ug/L, and lb/d, respectively. The facility also exceeded the phosphorus weekly average for loading, lb/d.		
Record: Other - Operations & Maintenance Plan		AOC: Yes
Ref #: RA1-RR-008	Reviewed By: Raymond Andrews	Reviewed Date: 05/16/2023
At the time of the inspection, I reviewed the facility's Operations and Maintenance (O&M) Plan. The O&M Plan was dated November 2014, and had not been updated to include facility upgrades completed in September 2019, as a requirement of the COC mentioned above.		

Record: Other - Quality Assurance Plan		AOC: Yes
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 05/16/2023
At the time of the inspection, I reviewed the facility's Quality Assurance Plan (QAP), dated December 2012. Due to missing items or insufficient detail, the QAP was not prepared in the required format using "EPA Requirements for Quality Assurance Project Plans (EPA/QA/R-5) and Guidance for Quality Assurance Project Plans (EPA/QA/G-5)". Some of the items required by EPA/QA/R-5 that are missing or lack sufficient detail: • Special Training/Certification - The QAP does not discuss how training will be provided or how the necessary skills will be assured and documented. (3.2.8) • Quality Control - The QAP does not identify QC activities needed for each sampling, analysis, or measurement technique and does not list the associated method or procedure, acceptance criteria, and corrective action for each required QC activity. The QAP does not state the frequency of analysis for each type of QC activity, and the spike compounds sources and levels nor does it state or reference the required control limits for each QC activity and corrective action required when control limits are exceeded and how the effectiveness of the corrective action shall be determined and documented. (3.3.5) • Data Management - The QAP does not "describe the project data management process, tracing the path of the data from their generation to their final use or storage (e.g., the field, the office, the laboratory) nor does it describe or reference the standard record-keeping procedures, document control system, and the approach used for data storage and retrieval on electronic media. (3.3.10) On June 21, 2023, the facility sent an updated QAP to review. It was in Word format and appeared to be unfinished due to key missing components. It was also not certified, signed, and dated. Since the 2023 QAP was not signed, I'm not including it in my Areas of Concern. The Areas of Concern listed below are based on the 2012 QAP.		
Record: Other - Master Users List		AOC: No
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 06/23/2023
Post inspection, I reviewed the facility's "Master Users List" which was generated on June 14, 2023. The facility does not have any actual industrial users. The Master Users List contains all the private citizens and businesses that connect to the facility.		
Record: Other - Emergency Response Plan		AOC: Yes
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 06/23/2023
Post inspection, I reviewed the facility's Emergency Response Plan, dated July 7, 2016. The plan appears to function as the Emergency Response and Public Notification (ERP) plan. Section 9 of the plan is titled "Plan Approval". The page states, "This plan is officially in effect when reviewed, approved, and signed by the following people...John F. Griffin - Reviewer, Leonard Johnson - Operator, Bill Weems - Mayor". The only signature on the page is that of the Reviewer, John F. Griffin. Without all three signatures, the plan is not in effect and thus has not been implemented. The plan has not been officially implemented.		

Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		AOC: Yes
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 06/22/2023
After the inspection, I reviewed data in EPA's ICIS database from May 1, 2018, through April 30, 2023. The ICIS database showed the facility was late in submitting one Discharge Monitoring Report (DMR). The DMR for the monitoring period ending October 31, 2022, due by November 20, 2022, was not received until January 6, 2023. The facility was late in submitting notification to EPA and the Coeur d'Alene Tribe that the Operations and Maintenance Plan had been completed. The notification was due February 27, 2021, but was not received until January 28, 2022. The facility was late in submitting notification to EPA and the Coeur d'Alene Tribe that the Quality Assurance Plan (QAP) had been completed. The notification was due February 27, 2021, but was not received until January 28, 2022. The facility did not submit the 2022 Surface Water Monitoring Report (SWMRP), which was due by January 20, 2023, as an attachment to the December 2022 DMR. The facility has not submitted notification to EPA and the Coeur d'Alene Tribe that the Emergency Response and Public Notification Plan has been completed. The notification was due February 27, 2021. The facility has not submitted the 2022 Effluent Monitoring Report to EPA and the Coeur d'Alene Tribe as required. The report was due by January 31, 2023.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		AOC: Yes
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 06/22/2023
After the inspection, I reviewed data in EPA's ICIS database from May 1, 2018, through April 30, 2023. The ICIS database showed the City of Plummer's wastewater treatment facility had 1,467 effluent exceedances during the timeframe reviewed.		

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-OB-001
<u>Permit Requirement</u>
Permit Part II.B.1 , "The QAP must be designed to assist in planning for the collection and analysis of effluent and receiving water samples in support of the permit and in explaining data anomalies when they occur."
Quality Assurance Plan Part 2.6.1 , "Field calibration for the City's Hach DPD pH/temperature probe is done once per month and includes using pH buffers at a standard of 7 and 10...Calibration is carried out per the manufactures specifications..."
AOC: The pH 7.0 calibration buffer solution was expired as can be seen in the photos below.



AOC Reference #: RA1-RR-003	Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database
Permit Requirement	
Permit Part I.B.1 , "The permittee must limit and monitor discharges from outfall 001 as specified in Table 1...All figures represent maximum effluent limits unless otherwise indicated. The permittee must comply with the effluent limits in the tables at all times unless otherwise indicated..."	
AOC: The facility had 1,467 effluent exceedances during the timeframe reviewed. A table of the exceedances is in Appendix 2 .	

AOC Reference #: RA1-RR-004	Records Review: Other - EPA's ICIS Database
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."	
AOC: The DMR for the monitoring period ending October 31, 2022, which was due by November 20, 2022, was not received until January 6, 2023.	

AOC Reference #: RA1-RR-004	Records Review: Other - EPA's ICIS Database
Permit Requirement	
Permit Part II.A , "Within 180 days of the effective date of this permit, the permittee must submit written notice to EPA and the Coeur d'Alene Tribe that the O&M Plan has been developed and implemented."	
AOC: The facility was late in submitting notification to EPA and the Coeur d'Alene Tribe notification the Operations and Maintenance Plan had been completed. The notification was due February 27, 2021, but was not received until January 28, 2022.	

AOC Reference #: RA1-RR-004	Records Review: Other - EPA's ICIS Database
<u>Permit Requirement</u>	
Permit Part II.B, "Within 180 days of the effective date of this permit, the permittee must submit written notice to EPA and the Coeur d'Alene Tribe that the QAP has been developed and implemented."	
AOC: The facility was late in submitting notification to EPA and the Coeur d'Alene Tribe the Quality Assurance Plan had been completed. The notification was due February 27, 2021, but was not received until January 28, 2022.	

AOC Reference #: RA1-RR-004	Records Review: Other - EPA's ICIS Database
<u>Permit Requirement</u>	
Permit Part I.C.7.b, "The permittee must submit the SWMRP as an attachment to the December DMR."	
AOC: The facility did not submit the 2022 Surface Water Monitoring Report (SWMRP), which was due by January 20, 2023, as an attachment to the December 2022 DMR.	

AOC Reference #: RA1-RR-004	Records Review: Other - EPA's ICIS Database
<u>Permit Requirement</u>	
Permit Part II.E.1, "The permittee must develop and implement an overflow emergency response and public notification plan..."	
Permit Part II.E.2, "The permittee must submit written notice to EPA and the Coeur d'Alene Tribe that the plan has been developed and implemented within 180 days of the effective date of this permit..."	
AOC: The facility has not submitted notification to EPA and the Coeur d'Alene Tribe that the Emergency Response and Public Notification Plan has been completed. The notification was due February 27, 2021.	

AOC Reference #: RA1-RR-004	Records Review: Other - EPA's ICIS Database
<u>Permit Requirement</u>	
Permit Part I.B.4, "Use the temperature device manufacturer's software to generate (export) an Excel or electronic ASCII text file. The file must be submitted annually to EPA and the Coeur d'Alene Tribe by January 31 for the previous monitoring year..."	
AOC: The facility has not submitted the 2022 Effluent Monitoring Report to EPA and the Coeur d'Alene Tribe as required. The report was due by January 31, 2023.	

AOC Reference #: RA1-RR-005	Records Review: Other - Emergency Response Plan
<u>Permit Requirement</u>	
Permit Part II.E.1, "The permittee must develop and implement an overflow emergency response and public notification plan that identifies measures to protect public health from overflows that may endanger health and unanticipated bypasses or upsets that exceed any effluent limitation in the permit."	
AOC: The plan appears to function as the Emergency Response and Public Notification (ERPN) plan. Section 9 of the plan is titled "Plan Approval". The page states, "This plan is officially in effect when reviewed, approved, and signed by the following people...John F. Griffin - Reviewer, Leonard Johnson - Operator, Bill Weems - Mayor". The only signature on the page is that of the Reviewer, John F. Griffin.	
Without all three signatures, the plan is not in effect and thus has not been implemented.	

AOC Reference #: RA1-RR-007	Records Review: Other - Quality Assurance Plan
Permit Requirement	
Permit Part II.B.2 , "Throughout all sample collection and analysis activities, the permittee must use EPA-approved QA/QC and chain-of-custody procedures described in EPA Requirements for Quality Assurance Project Plans (EPA/QA/R-5) and Guidance for Quality Assurance Project Plans (EPA/QA/G-5). The QAP must be prepared in the format that is specified in these documents."	
AOC: Due to missing items or insufficient detail, the QAP was not prepared in the required format using "EPA Requirements for Quality Assurance Project Plans (EPA/QA/R-5) and Guidance for Quality Assurance Project Plans (EPA/QA/G-5)". Some of the items required by EPA/QA/R-5 that are missing or lack sufficient detail:	
• Special Training/Certification - The QAP does not discuss how training will be provided or how the necessary skills will be assured and documented. (Paragraph 3.2.8, EPA/QA/R-5) • Quality Control - The QAP does not identify QC activities needed for each sampling, analysis, or measurement technique and does not list the associated method or procedure, acceptance criteria, and corrective action for each required QC activity. The QAP does not state the frequency of analysis for each type of QC activity, and the spike compounds sources and levels nor does it state or reference the required control limits for each QC activity and corrective action required when control limits are exceeded and how the effectiveness of the corrective action shall be determined and documented. (Paragraph 3.3.5, EPA/QA/R-5) • Data Management - The QAP does not "describe the project data management process, tracing the path of the data from their generation to their final use or storage (e.g., the field, the office, the laboratory) nor does it describe or reference the standard record-keeping procedures, document control system, and the approach used for data storage and retrieval on electronic media. (Paragraph 3.3.10, EPA/QA/R-5)	

AOC Reference #: RA1-RR-007	Records Review: Other - Quality Assurance Plan
Permit Requirement	
Permit Part II.B.3.a , "At a minimum, the QAP must include the following...Details on the number of samples, type of sample containers, preservation of samples, holding times, analytical methods, analytical detection and quantitation limits for each target compound, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements."	
AOC: The QAP is missing, or does not contain sufficient details on, the number of samples, quantitation limits for each target compound, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements.	

AOC Reference #: RA1-RR-007	Records Review: Other - Quality Assurance Plan
Permit Requirement	
Permit Part II.B.3.c , "At a minimum, the QAP must include the following...Qualification and training of personnel."	
AOC: The QAP does not list the qualification and training of personnel.	

AOC Reference #: RA1-RR-008	Records Review: Other - Operations & Maintenance Plan
Permit Requirement	
Permit Part II.A , "...Any changes occurring in the operation of the plant must be reflected within the O&M Plan."	
AOC: The 2014 O&M Plan had not been updated to include the upgrades required by the Compliance Order on Consent. The upgrades were completed in 2019.	

AOC Reference #: RA1-RR-009	Records Review: Other - EPA Compliance Order on Consent (COC)
<u>Permit Requirement</u> Section III, paragraph 3.5 of the Compliance Order on Consent , "Respondent shall achieve compliance with the effluent limitations in the Permit and provide written notification to the EPA that Respondent has achieved compliance with the effluent limitations by September 1, 2018." (Date of required compliance extended to October 1, 2019.)	
AOC: The facility failed to meet the requirements of paragraph 3.5 of the COC. The facility was required to meet its effluent limits by October 1, 2019. The ICIS effluent exceedance report shows the facility was still exceeding its effluent limits in October 2019. In October 2019, the facility exceeded its phosphorus monthly average for both concentration and loading, ug/L, and lb/d, respectively. The facility also exceeded the phosphorus weekly average for loading, lb/d.	

SECTION VI – Closing Conference

I held a closing conference with Mr. Wereley at 01:50 PM (PT) on 05/16/2023. During the closing 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 VII – List of Appendices

1. Appendix 1 – Photo Log
2. Appendix 2 – Effluent Exceedances Table

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 Area of Concern are included in the inspection report.

P1010751 – pH Calibration Buffer Solution 7.0, photo 1

P1010752 – Accidentally Deleted

P1010753 – pH Calibration Buffer Solution 7.0, photo 2

P1010754 – Equalization Basin, aka “Overflow Lagoon”

APPENDIX 2: Effluent Exceedance Table

Effluent Exceedances

Month	Parameter	DMR Value	Permit Limit	Unit	Limit Type	# Violations
August 31, 2018	Ammonia total	5.3	2.5	mg/L	Mo Avg	31
August 31, 2018	Ammonia total	11.2	7.8	mg/L	Daily Mx	1
September 30, 2018	Ammonia total	4.5	2.5	mg/L	Mo Avg	30
September 30, 2018	Ammonia total	14.8	7.8	mg/L	Daily Mx	1
January 31, 2019	Ammonia total	21.0	20.8	lb/d	Daily Mx	1
January 31, 2019	Phosphorus, total	0.18	0.133	lb/d	Mo Avg	31
January 31, 2019	Phosphorus, total	0.62	0.35	lb/d	Wkly Avg	7
January 31, 2019	Phosphorus, total	71.0	50.0	ug/L	Mo Avg	31
January 31, 2019	Phosphorus, total	404.0	131.0	ug/L	Wkly Avg	7
February 28, 2019	Phosphorus, total	87.0	50.0	ug/L	Mo Avg	28
February 28, 2019	Phosphorus, total	190.0	131.0	ug/L	Wkly Avg	7
March 31, 2019	Phosphorus, total	0.271	0.133	lb/d	Mo Avg	31
March 31, 2019	Phosphorus, total	0.955	0.35	lb/d	Wkly Avg	7
March 31, 2019	Phosphorus, total	70.0	50.0	ug/L	Mo Avg	31
March 31, 2019	Phosphorus, total	209.0	131.0	ug/L	Wkly Avg	7
May 31, 2019	Ammonia total	9.0	7.8	mg/L	Daily Mx	1
May 31, 2019	Phosphorus, total	1.61	0.133	lb/d	Mo Avg	31
May 31, 2019	Phosphorus, total	3.5	0.35	lb/d	Wkly Avg	7
May 31, 2019	Phosphorus, total	111.0	50.0	ug/L	Mo Avg	31
May 31, 2019	Phosphorus, total	134.0	131.0	ug/L	Wkly Avg	7
May 31, 2019	<i>E. coli</i>	2420.0	235.0	#/100mL	Inst Max	1
June 30, 2019	Phosphorus, total	367.0	131.0	ug/L	Wkly Avg	7
July 31, 2019	Phosphorus, total	98.0	50.0	ug/L	Mo Avg	31
September 30, 2019	Ammonia total	6.0	2.5	mg/L	Mo Avg	30
September 30, 2019	Ammonia total	23.0	7.8	mg/L	Daily Mx	1
September 30, 2019	Phosphorus, total	191.0	131.0	ug/L	Wkly Avg	7
October 31, 2019	Phosphorus, total	1.38	0.133	lb/d	Mo Avg	31
October 31, 2019	Phosphorus, total	3.4	0.35	lb/d	Wkly Avg	7
October 31, 2019	Phosphorus, total	92.0	50.0	ug/L	Mo Avg	31
October 31, 2019	Phosphorus, total	166.0	131.0	ug/L	Wkly Avg	7
January 31, 2020	Phosphorus, total	0.14	0.133	lb/d	Mo Avg	31
January 31, 2020	Phosphorus, total	0.52	0.35	lb/d	Wkly Avg	7
April 30, 2020	Ammonia total	2.8	2.5	mg/L	Mo Avg	30
April 30, 2020	Ammonia total	10.8	7.8	mg/L	Daily Mx	1
May 31, 2020	Ammonia total	3.14	2.5	mg/L	Mo Avg	31
May 31, 2020	Ammonia total	11.9	7.8	mg/L	Daily Mx	1
May 31, 2020	Ammonia total	23.9	20.8	lb/d	Daily Mx	1
December 31, 2020	Ammonia total	3.3	2.5	mg/L	Mo Avg	31
February 28, 2021	Phosphorus, total	1.04	0.267	lb/d	Mo Avg	28
February 28, 2021	Phosphorus, total	1.15	0.803	lb/d	Wkly Avg	7
March 31, 2021	Phosphorus, total	1.06	0.267	lb/d	Mo Avg	31
March 31, 2021	Phosphorus, total	1.5	0.803	lb/d	Wkly Avg	7
April 30, 2021	Phosphorus, total	2.04	0.35	lb/d	Wkly Avg	7
April 30, 2021	Phosphorus, total	2.76	0.133	lb/d	Mo Avg	30
May 31, 2021	Phosphorus, total	0.7548	0.133	lb/d	Mo Avg	31
June 30, 2021	Phosphorus, total	0.443	0.35	lb/d	Wkly Avg	7
June 30, 2021	Phosphorus, total	0.7438	0.133	lb/d	Mo Avg	30
July 31, 2021	Phosphorus, total	0.243	0.133	lb/d	Mo Avg	31
July 31, 2021	Phosphorus, total	0.4565	0.35	lb/d	Wkly Avg	7

Month	Parameter	DMR Value	Permit Limit	Unit	Limit Type	# Violations
August 31, 2021	Phosphorus, total	2.6	0.133	lb/d	Mo Avg	31
August 31, 2021	Phosphorus, total	2.771	0.35	lb/d	Wkly Avg	7
September 30, 2021	Ammonia total	6.76	2.5	mg/L	Mo Avg	30
September 30, 2021	Ammonia total	13.0	7.8	mg/L	Daily Mx	1
September 30, 2021	Phosphorus, total	2.06	0.133	lb/d	Mo Avg	30
September 30, 2021	Phosphorus, total	3.995	0.35	lb/d	Wkly Avg	7
September 30, 2021	<i>E. coli</i>	365.0	235.0	/100mL	Inst Max	1
October 31, 2021	Phosphorus, total	0.679	0.35	lb/d	Wkly Avg	7
October 31, 2021	Phosphorus, total	0.8	0.133	lb/d	Mo Avg	31
November 30, 2021	Phosphorus, total	0.589	0.35	lb/d	Wkly Avg	7
November 30, 2021	Phosphorus, total	0.6	0.133	lb/d	Mo Avg	30
December 31, 2021	Phosphorus, total	0.3	0.267	lb/d	Mo Avg	31
January 31, 2022	Phosphorus, total	1.1	0.267	lb/d	Mo Avg	31
February 28, 2022	Phosphorus, total	0.301	0.267	lb/d	Mo Avg	28
March 31, 2022	Phosphorus, total	0.42	0.267	lb/d	Mo Avg	31
May 31, 2022	Phosphorus, total	0.45	0.267	lb/d	Mo Avg	31
June 30, 2022	Phosphorus, total	0.918	0.267	lb/d	Mo Avg	30
June 30, 2022	Phosphorus, total	1.34	0.803	lb/d	Wkly Avg	7
July 31, 2022	Phosphorus, total	0.38	0.133	lb/d	Mo Avg	31
July 31, 2022	Phosphorus, total	0.52	0.35	lb/d	Wkly Avg	7
August 31, 2022	Phosphorus, total	1.17	0.35	lb/d	Wkly Avg	7
September 30, 2022	Phosphorus, total	0.154	0.133	lb/d	Mo Avg	30
January 31, 2023	Phosphorus, total	0.91	0.267	lb/d	Mo Avg	31
January 31, 2023	Phosphorus, total	2.45	0.803	lb/d	Wkly Avg	7
February 28, 2023	Phosphorus, total	1.56	0.267	lb/d	Mo Avg	28
February 28, 2023	Phosphorus, total	4.37	0.803	lb/d	Wkly Avg	7
March 31, 2023	pH	8.92	8.5	SU	Inst Max	1
March 31, 2023	Phosphorus, total	1.26	0.267	lb/d	Mo Avg	31
March 31, 2023	Phosphorus, total	5.72	0.803	lb/d	Wkly Avg	7
April 30, 2023	pH	9.24	8.5	SU	Inst Max	1
April 30, 2023	Phosphorus, total	1.23	0.133	lb/d	Mo Avg	30
April 30, 2023	Phosphorus, total	1.8	0.35	lb/d	Wkly Avg	7
May 31, 2023	pH	8.67	8.5	SU	Inst Max	1
May 31, 2023	Ammonia total	8.95	7.8	mg/L	Daily Mx	1
May 31, 2023	Phosphorus, total	0.72	0.133	lb/d	Mo Avg	31
May 31, 2023	Phosphorus, total	2.78	0.35	lb/d	Wkly Avg	7
May 31, 2023	<i>E. coli</i>	2420.0	235.0	/100mL	Inst Max	1