

INSPECTION REPORT

Inspection Entry Date/Time	10/25/2023 08:03 AM (CT)	Announced: Yes	
Inspection Exit Date/Time	10/25/2023 11:30 AM (CT)	Access: Granted	
Weather			
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Permittee Name	Menominee Tribal Utilities		
Facility or Site Name	Neopit Wastewater Treatment Facility		
Facility/Site Physical Address	W1599 N. County Highway M		
City, State, Zip Code	Neopit, WI 54150		
County/Borough/Parish	Menominee County		
Facility GPS Coordinates	44.893249, -88.592349		
FRS ID	110012921071		
Permit Number(s) (If Applicable)	WI0073059		
SIC and/or NAICS	4952		
Regulatory Representatives Participating in Inspection:			
Title	Name	Organization	
Inspector	Ray Cullen	EPA REGION 5	
Lead Inspector:			
Dean Maraldo	[Signature] DINO MARALDO Digitally signed by DINO MARALDO Date: 2023.11.07 13:42:17 -06'00'		
	EPA REGION 5	Maraldo.Dean@epa.gov	(312) 353-2098
Supervisor Review:			
Ryan Bahr	[Signature] RYAN BAHR Digitally signed by RYAN BAHR Date: 2023.11.07 17:25:48 -06'00'		
	EPA REGION 5	bahr.ryan@epa.gov	

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

I, EPA Region 5 Lead Inspector, Dean Maraldo, arrived at the Neopit Wastewater Treatment Facility (the “Facility” or “Neopit WWTF”), located within the Menominee Indian Reservation, Menominee County, Neopit, Wisconsin (the S 1/2 of Section 17, Township 29N, Range 14 E), at 08:03 AM (CT) on October 25, 2023, for an announced inspection. I was joined by EPA inspector Ray Cullen. We presented our EPA inspector credentials to Darryl Pyawasay (Operator) and informed them that this was an EPA inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by Facility representatives, direct observations made by the EPA inspectors, records and reports maintained by the Facility and other information including: photographs taken by EPA inspectors, physical evidence collected by the EPA inspectors, measurements taken by EPA inspectors, verbal or written statements made by Facility representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA inspectors by Facility representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA 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 5	Dean Maraldo	Lead Inspector	Yes	Yes
EPA Region 5	Ray Cullen	Inspector	Yes	Yes
Indian Health Service	Shane Hoffman	Tribal Utility Consultant	Yes	Yes
Menominee Tribal Utilities	David Mahkimetas	Operator	Yes	Yes
Menominee Tribal Utilities	Darryl Pyawasay	Operator	Yes	Yes

Facility/Site Description

I began by reviewing the Facility description provided in the Facility’s NPDES Permit, as follows:

The renovated treatment system consists of two aerated cells followed by a settling cell. These cells are meant to be operated in series with an operating depth of 12 feet.

Following the settling cell, the operator can direct the effluent to any of three seepage cells for final disposal.

The maximum daily average design flow rate to the new system is 0.17 million gallons per day (mgd) with a peak sustained flow of 0.34 mgd.

Final discharge to groundwater via seepage cells to Tourtillotte Creek.

Darryl Pyawasay confirmed that the description is still accurate.

Facility/Site Information

Next, I asked some background questions. Darryl Pyawasay provided the responses in the table below.

Do you use in-house or contract out for laboratory analyses?	Contract out to lab for Biochemical Oxygen Demand (CBOD), Phosphorus, Ammonia, and Total Suspended Solids (TSS)
Operation schedule?	Facility checked twice a week; cells swapped every thirty days; monitored with SCADA
Outfalls?	No outfall, seepage cells to groundwater
WWTP Approx. # of residents served?	335 connections
WWTP Design Capacity & Average Daily Flow?	covered in description as summarized above, yesterday 0.107 million gallons per day (MGD), avg 0.7-0.9 MGD. Overnight lows around 0.06 MGD
Responsible official?	Darryl Pyawasay
Do you accept waste from septage haulers?	No
Is there currently any portion of the treatment train that is non-operational?	One aerator tube not working, but system still working (Indian Health Service SDS project planned for 2024 completion)
Are there any plans for renovation or additional equipment to allow for increased wastewater flow?	No
Any Industrial Users?	No
Have any bypasses or overflows happened at the plant or in the collection system in the last year?	No
How do you manage your biosolids?	No sludge issue, cleaned out during last rehab
CBI concerns?	No

Inspection Focus Areas and Locations

Location/Area/Sub-area	Description
Interview	Operations office at Keshena WWTP
Records/Non-DMR Reporting	
Self Monitoring	
Operations and Maintenance (O&M)	
Flow Monitoring	
SSOs	
Physical Inspection	Neopit WWTF
Close Out Conference	Operations office at Keshena WWTP

SECTION II – OBSERVATIONS

Location: Interview/Records/Non-DMR Reporting**Observation #:** DM1-OB-001**Date:** 10/25/2023

I reviewed the Facility's compliance data in EPA's ECHO database. There were no reported effluent limit exceedances in the last five years. I asked the following reporting-related questions and Darryl Pyawasay provided the responses (in bold), below:

- Are Facility NPDES records and reports maintained for at least 3 years? **Yes.**
- Has the Treatment System Map been completed? **Yes.** I also confirmed completion with the EPA Region 5 Permits Program.
- Are you implementing a Preventive Maintenance Program (Permit Part I.d.3.d.)? **Yes.**
- Are daily logs maintained per Permit Part I.B.2.? **Yes, operational logs are at the Facility.**
- Additional monitoring completed per Permit Part I.D.7. (4 times over permit terms, annually)? **Yes, up to date. Done four times**

Location: Interview/Self Monitoring**Observation #:** DM1-OB-002**Date:** 10/25/2023

I asked the following Self Monitoring-related questions and Darryl Pyawasay provided the responses (in bold), below:

- Where are influent and effluent samples collected? **Influent samples are collected at the autosampler in the control building before treatment on the main line coming in. Effluent autosamplers are located in the control building after the Parshall flume before going to the seepage cells. Grab samples are collected from the autosampler. pH/DO samples are brought back to lab for analysis.**
- Do you record pH/DO sample analysis time? **No.**
- Are composite samples cooled to <4°C to properly preserve them during the compositing period? **Yes.**
 - Do you measure the final composite sample temperature to make sure that the cooling is sufficient? **Yes.**
 - Do you record these results? **Yes.**
- Is there a thermometer in the refrigerator used to store samples? **Yes.**
- Is this thermometer checked each time that it is used and are the results of the checks recorded? **Yes.**
- Are all grab samples cooled with ice, gel packs or refrigerated to <6°C from the time of collection until analysis including shipping time, if applicable? **Yes.**
- Do you have a copy of the EPA approved analytical methods for each of the analyses performed at the Facility? **Yes, we will provide a copy.**
- Are the thermometers annually checked for calibration using a NIST certified thermometer or does the Facility purchase new NIST certified thermometers yearly? **No.**
- Commercial lab used? **Yes, Northern Lakes Service, Crandon, WI.**
- Do monitoring records include laboratory instrument calibration and maintenance records? **Yes.**

Location: Interview/O&M**Observation #:** DM1-OB-003**Date:** 10/25/2023

I asked the following O&M-related questions and Darryl Pyawasay provided the responses (in bold), below:

- Are all treatment units operable? **Yes.**
- Collection system information:
 - How many miles of sewer? **We will provide.**

- How many lift stations? **Two.**
- How many customers or connections? **335 connections.**
- Is the Management Plan available and does it meet the requirements in Permit Part I.B.3.6.? **Yes.**
- Summarize operator certifications: **three certified wastewater operators.**
- Sufficient sludge is wasted from treatment system at proper time intervals to maintain process efficiency. **No sludge issues here.**
- On a regular basis, operators monitor the key operating parameters? **Yes, groundwater system, so once per month check DO across lagoons to check aeration.**
- Bypasses in last 12 months? **No.**
- Does the wastewater treatment facility have an alarm system for all essential equipment? **Yes, for Facility we have a SCADA linked to phones. Power, blower failure, security, and building temps trigger alarms. Lift station alarms include high level, low level, pump failures, power, etc.**
- Are alarms sent to qualified personnel who can respond immediately to remedy the problem? **Yes, via SCADA.**
- Are routine and preventive maintenance scheduled performed and recorded? **Yes.**
- Does the Facility maintain written procedures for responding to emergencies such as power failures, floods, fires, and other natural disasters? **Yes.**
- Is a logbook kept which documents all plant activities on a daily basis? **Yes.**
- Does the Facility maintain an inventory of spare parts, either at the Facility or close by, sufficient to keep all of its treatment units operational? **Yes, part of a new asset management system.**
- Does the Facility have standby power for all treatment units? **Yes, all Neopit facilities covered by dedicated generators.** Is the standby power regularly exercised under load? **Yes.**
- Is septage waste accepted at the Facility? **No.**
- How do you maintain vegetation on the dikes? **Burning once a year per management plan but looking into alternatives such as herbicide application.**

Location: Interview/Flow Monitoring**Observation #:** DM1-OB-004**Date:** 10/25/2023

I asked the following Flow Monitoring-related questions and Darryl Pyawasay provided the responses (in bold), below:

- What type of influent meter is used? **Rosemont mag meter.** What type of effluent meter is used? **Parshall flume with flow sensor.**
- Are influent and effluent flow measuring devices professionally calibrated at least once per year? **Yes, calibrated yearly, last time in August 2023.**
- Do Facility personnel check the calibration of the flow measuring devices, between the annual professional calibrations? **Yes, but not often, twice in several years.**
- If yes, do Facility personnel record the results of these additional tests, and are the results within 10 percent accuracy? **No.**

Location: SSOs/SSOs**Observation #:** DM1-OB-005**Date:** 10/25/2023

I asked Darryl Pyawasay if they experienced any backups or overflows in the sanitary sewer collection system, including lift stations, manholes and piping since the last inspection? **He said no and added that he was aware of some lateral backups due to "customer issues".**

Location: Physical Inspection/Neopit WTF		
Observation #: DM1-OB-006	Date: 10/25/2023	Weather: rain, cool
We completed the interview portion of inspection at 10:00 am CT and drove to the Neopit wastewater treatment facility to conduct the physical inspection. Physical Inspection observations are documented in the Photo Log (see Appendix 1). The physical inspection concluded at 10:45 am CT on October 25, 2023.		
Photo(s) 1. NEOP0325.JPG 2. NEOP0326.JPG 3. NEOP0327.JPG 4. NEOP0328.JPG 5. NEOP0329.JPG 6. NEOP0331.JPG 7. NEOP0332.JPG 8. NEOP0333.JPG 9. NEOP0334.JPG 10. NEOP0335.JPG 11. NEOP0336.JPG 12. NEOP0337.JPG		

SECTION III – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION IV - AREA 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 #: DM1-OB-002	Location: Interview/Self Monitoring
Regulation and/or Permit Requirement Permit Part I.B.2: Monitoring Requirements and Limitations. pH grab samples to be analyzed in the field and immediately after collection. Permit Part II.B.1: Proper Operations 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.	

AOC:

- Effluent pH samples are collected from the autosampler and brought to the lab for analysis. Permit Part I.B. requires pH samples to be collected as grab samples and analyzed immediately in the field.
- Sample/lab bench sheets for TSS, pH, DO do not include sampler name, analyzer name, time of collection, and time of analysis.
- Thermometers are not checked annually for calibration using a NIST certified thermometer.

AOC Reference #: DM1-OB-004**Location: Interview/Flow Monitoring****Regulation and/or Permit Requirement**

Permit Part II.C.2: Flow Measurement. Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to ensure that the accuracy of the measurements is consistent with the accepted capability of that type of device.

AOC:

Facility personnel do not routinely check and record the calibration of the flow measuring devices, between the annual professional calibrations.

AOC Reference #: DM1-OB-006**Location: Physical Inspection/Neopit WTF****Regulation and/or Permit Requirement**

Permit Part II.B.1: Proper Operations 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.

AOC:

- Observed heavy cattails in the water along the edge of Aeration lagoon #2 (Photo Log image NEOP0328.JPG);
- Observed heavy algae cover and heavy cattails on the Polishing Pond ((Photo Log image NEOP0329.JPG); and
- Observed heavy vegetation on Seepage cell #1 (Photo Log image NEOP0332.JPG).

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

I held the inspection closing conference with Facility personnel at 11:15 AM (CT) on October 25, 2023. During the closing conference, I discussed the observations and preliminary Area of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination. I also provided an estimated timeframe for completing an inspection report.

I requested copies of treatment flow diagram and O&M manual by Wednesday, November 1.

Before concluding the inspection, I asked if there were any questions. Facility representatives had no further questions. We concluded the inspection and departed the Facility at 11:30 AM (CT) on October 25, 2023.

Follow Up

The following items were requested by the inspector at the time of the inspection.

Location:	Area: O&M
DM1-RR-001	
Requested electronic copies of treatment system flow diagrams and operations and maintenance manual. [Received via email on October 30, 2023].	
Location: Interview	Area: O&M
DM1-OB-003	
Requested Facility representatives provide the number of miles of sewer in the collection system.	
Location: Interview	Area: Self Monitoring
DM1-OB-002	
Requested electronic copy of the EPA approved analytical methods for each of the analyses performed at the Facility. [Received via email on October 30, 2023].	

Communication Log

I received an electronic copy of the treatment system flow diagrams, collection system diagrams, operations and maintenance manual, and lab analytical methods summary from Darryl Pyawasay via email on October 30, 2023.

SECTION VI – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



<i>Influent Autosampler</i>			NEOP0325.JPG
10/25/2023 10:28 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99051333, -88.82409833
Noted thermometer.			



<i>Influent flowmeter display</i>			NEOP0326.JPG
10/25/2023 10:29 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99051333, -88.82409833



<i>Aeration lagoon #1</i>			NEOP0327.JPG
10/25/2023 10:29 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99051333, -88.82409833



<i>Aeration lagoon #2</i>			NEOP0328.JPG
10/25/2023 10:31 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99065, -88.82392999
Noted heavy cattails in the water along the edge of the lagoon.			



Polishing pond			NEOP0329.JPG
10/25/2023 10:31 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99051166, -88.82332333
Noted heavy algae cover and cattails.			



Effluent Parshall Flume Vault			NEOP0331.JPG
10/25/2023 10:34 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99095833, -88.82405666
Noted flow sensor.			



Seepage cell #1			NEOP0332.JPG
10/25/2023 10:35 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99101666, -88.82392833
Noted heavy vegetation.			



Facility backup generator			NEOP0333.JPG
10/25/2023 10:36 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99101666, -88.82392833



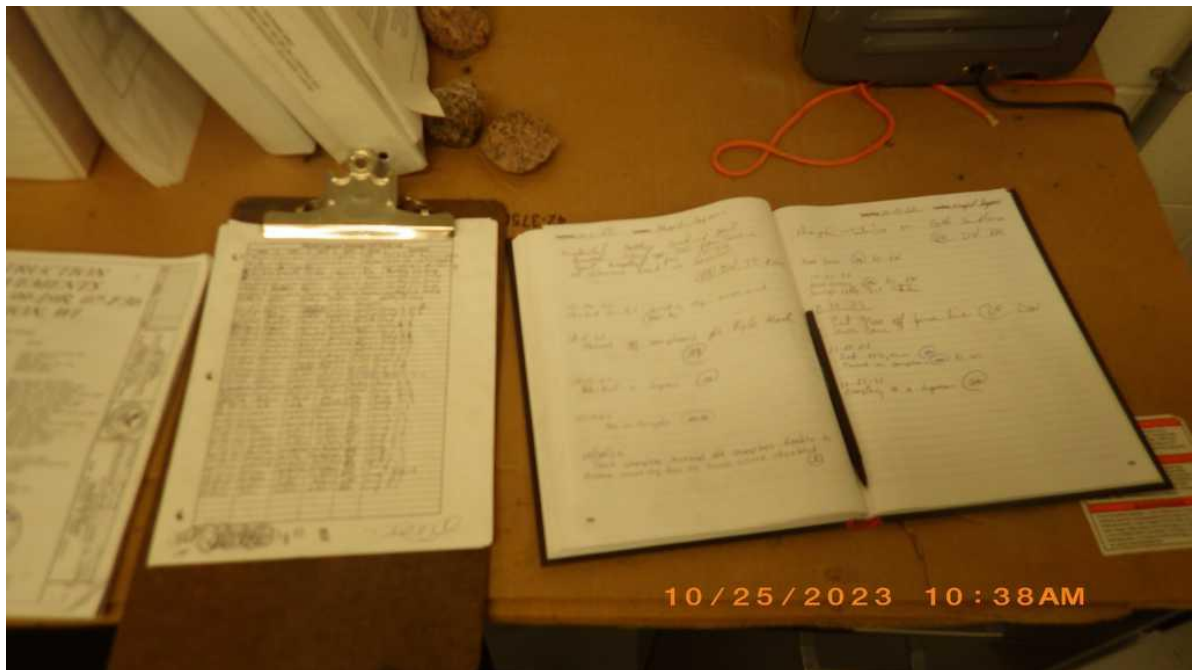
<i>Aeration blowers (3)</i>			NEOP0334.JPG
10/25/2023 10:37 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99095666, -88.824105



<i>Effluent Autosampler</i>			NEOP0335.JPG
10/25/2023 10:37 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99079833, -88.82412833
Noted thermometer and clear tubing.			



Effluent flowmeter display			NEOP0336.JPG
10/25/2023 10:38 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.99079833, -88.82412833



Daily operations log and seepage cell rotation log			NEOP0337.JPG
10/25/2023 10:38 AM	No CBI	No PII	Dean Maraldo
Physical Inspection/Neopit WTF			44.990905, -88.82420666
Seepage cells are rotated monthly.			

APPENDIX 2: DOCUMENT LOG

Document Name	Contains CBI or PII	Date Received	Pages	Attached to Report?
NPDES Permit WI0073059	No	10/23/2023	28	No
Neopit Detailed Facility Report source: EPA-ECHO	No	10/23/2023	7	No
Neopit Facility Drawing and Schematics	Yes	10/30/2023	38	No
Neopit O&M Manual	No	10/30/2023	78	No
Lab Methods Summary	No	8/29/2023	1	Yes

Lab Analysis Performed On Site and Standard Method

<u>Lab Test</u>	<u>Standard Method</u>
• Temperature	2550
• BOD	5210-B
• Dissolved Oxygen	4500-O H Optical Probe
• PH	4500-H
• Total Suspended Solids TSS	2540-D
• MLVSS Mixed Liquor Volatile Suspended Solids	2540-E
• Settleable Solids	2540-S
• Sludge Volume Index	2710-D
• FM/Ratio	
• Mean Cell Resident Time MCRT	