U.S. EPA Region 8 NPDES Inspection Report

National Database Information	
Inspection Date: **September 20, 2022**	Inspection Type: **Compliance Evaluation Inspection**
Entry / Exit Time: **08:00 AM / 16:20 PM**	NPDES ID: **SDG589607 (EPA Region 8 Lagoon General Permit SDG589###)**
Major / Non-Major Facility: **Non-Major**	Program Sector(s): **Publicly-Owned Treatment Works (POTW)**
NAICS Code: **221320 (Sewage Treatment Facilities)**	Inspection ID: **202209_SDG589607**
Lead inspector and affiliation: **Akash Johnson / U.S. EPA Region 8**	
Inspector and affiliation: **Stephanie Meyers / U.S. EPA Region 8**	

Facility Location Information	
Site/Facility Name & Location: **Parmelee WWTF** **Parmelee (Todd County), South Dakota 57566** **43.329203, -101.027794**	Email Report to: **Young Colombe** **Sewer Revenue Department Director** **Rosebud Sioux Tribe** **ycolombe@sicangu.com**

Contact Information	
	Name(s)/Title
Facility Contacts	**Young Colombe / Director / Sewer Revenue Department, Rosebud Sioux Tribe (present for opening conference only)**
Indian Health Service Contacts	**James Begeman / Tribal Utility Consultant / Indian Health Service (present)**
	Erik Anderson / Senior Environmental Engineer / Indian Health Service (present for opening conference only)
	Chuck Mack / Environmental Health Officer / Indian Health Service (present)
Tribal Government Contacts	**Ivan Crow Eagle / Environmental Director / Rosebud Sioux Tribe (not present)**
Person/Company meeting definition of "Owner"	**Rosebud Sioux Tribe**
Person/Company meeting definition of "Operator"	**Sewer Revenue Department, Rosebud Sioux Tribe**
Responsible Official(s)	**Young Colombe / Director / Sewer Revenue Department, Rosebud Sioux Tribe (present for opening conference only)**

Permit / Facility Information	
Permit on site and available: **Yes**	Permit Application Date: **Received April 12, 2016**
Effective Date: **April 25, 2016**	Expiration Date: **December 31, 2020 (administratively continued at time of inspection)**
Latitude: **43.329203**	Longitude: **-101.027794**
Receiving Water(s): **Unnamed tributary of Cut Meat Creek**	
Weather Conditions: **Clear**	
Inspector's source of information: **Facility representatives and records, Indian Health Service representatives and records, EPA records and databases, and inspection observations**	

Areas Evaluated During Inspection		
Permit	**Self-Monitoring Program**	Pretreatment
Records	Compliance Schedule	Pollution Prevention
Facility Site Review	Laboratory	Stormwater
Effluent/Receiving Waters	**Operations and Maintenance**	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow

Report Review and Signature		
Lead Inspector Name/Signature/Date	Draft Date	Contact Information
AKASH JOHNSON Digitally signed by AKASH JOHNSON Date: 2023.01.04 08:00:50 -07'00'	**December 28, 2022**	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202** **johnson.akash@epa.gov** **(303) 312-6067**
Reviewer Name	Review Date	Contact Information
Stephanie Meyers	**January 3, 2023**	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202** **meyers.stephanie@epa.gov** **(303) 312-6938**
Management Reviewer Name/Signature/Date		Contact Information
MICHAEL BOEGLIN Digitally signed by MICHAEL BOEGLIN Date: 2023.01.04 06:56:17 -07'00'		**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202** **boeglin.michael@epa.gov** **(303) 312-6250**
Michael Boeglin, NPDES and Wetlands Enforcement Section Supervisor		

Inspection Narrative and Facility Description

1.0 Introduction

On Tuesday, September 20, 2022, I, U.S. Environmental Protection Agency (EPA) inspector Akash Johnson, accompanied by EPA inspector Stephanie Meyers (collectively, "we"), conducted a compliance evaluation inspection of the Parmelee wastewater treatment facility (WWTF; facility), located in Todd County, South Dakota, on the Rosebud Reservation (Reservation). For the entirety of the inspection, we were accompanied by Indian Health Service (IHS) representative James Begeman. For the opening conference portion of the inspection, we were accompanied by IHS representatives Erik Anderson and Chuck Mack and Rosebud Sioux Tribe Sewer Revenue Department representative Young Colombe. The inspection was coordinated with the Sewer Revenue Department and Rosebud Sioux Tribe Environmental Protection Office several weeks in advance, and an inspection notification letter was sent to the Rosebud Sioux Tribe on August 30, 2022. The purpose of the inspection was to evaluate compliance with applicable National Pollutant Discharge Elimination System (NPDES) and Clean Water Act requirements. Throughout the inspection, we took notes on our discussions and observations in bound checklists. Photographs taken during the inspection are included in the attached photo log.

2.0 Background

At the time of the inspection, the facility was authorized to discharge in accordance with the conditions of the 2016-2020 EPA Region 8 Lagoon General Permit SDG589### (Permit; 2016 LGP). The Permit expired on December 31, 2020, but Permit coverage for the facility was administratively continued by the EPA. The facility was assigned facility-specific NPDES ID SDG589607 with no authorization to discharge requirements identified in Part 4 of the 2016 LGP. After the inspection, the EPA issued the Sewer Revenue Department coverage for the facility under the 2022-2027 LGP (2022 LGP), effective January 1, 2023, with the same NPDES ID and authorization to discharge and semi-annual reporting requirements identified in Part 3 of the 2022 LGP.

Based on my review of EPA records, prior to the subject inspection, the most recent EPA NPDES inspection of the facility occurred on September 15, 2015 (Inspection ID: 201509_SDG589607).

On October 13, 2016, the Sewer Revenue Department voluntarily entered into an Administrative Order on Consent (AOC) with the EPA (Docket No. CWA-08-2017-0002) (2016 AOC) to address alleged violations of various administrative and operational requirements of NPDES permits for multiple WWTFs operated by the Sewer Revenue Department, including the subject facility.

As of drafting this report, I have not been able to determine whether a closure letter was issued for the 2016 AOC, although its status was identified as "Closed" on the EPA Administrative Enforcement Docket webpage (https://yosemite.epa.gov/OA/RHC/EPAAdmin.nsf, accessed December 2, 2022). It is noted the EPA may not issue closure letters for AOCs in all instances.

Records pertaining to the aforementioned activities are maintained in EPA files. Engineering records pertaining to the facility are primarily maintained by the IHS and the Sewer Revenue Department.

3.0 Inspection Narrative and Facility Description

The inspection began when we arrived at the Rosebud Sioux Tribe Water Resources building at approximately 08:00 AM. We convened with Young, James, Erik, and Chuck in a conference room, presented our inspector credentials, and conducted an opening conference. During the opening conference, we asked questions pertaining to the design, operation, and CWA and NPDES compliance

of multiple wastewater treatment facilities operated by the Sewer Revenue Department, including the subject facility.

At the time of the inspection, the Sewer Revenue Department maintained two full-time operators on staff, dedicated solely to wastewater operations across approximately fourteen communities served. Routine operator tasks and schedules, such as daily rounds, were not regularly documented, but non-routine tasks, such as responding to backups, were assigned and tracked through an electronic work order management system. Young and IHS representatives indicated the tracking of non-routine tasks through the work order management system had helped identify recurring problems and areas in some service areas where infrastructure improvements could be beneficial, which had resulted in some wastewater infrastructure improvement projects being completed through the IHS's Sanitary Deficiencies System (SDS).

Sewer Revenue Department finances were briefly discussed during the opening conference, but no financial records were reviewed. Young stated the following: approximately 1,100 Tribal Housing Authority residences were served across the Reservation; the Housing Authority had historically paid the Sewer Revenue Department $15 per month per Housing Authority residence served; the arrangement had ceased several years prior to the inspection; a resolution had more recently been passed enabling the Sewer Revenue Department to resume charging the Housing Authority for services; no revenue had been collected since passing of the resolution. Commercial billing and other potential sources of revenue were not discussed at-length during the inspection. Young stated funding received through the Coronavirus Aid, Relief, and Economic Security (aka CARES) Act and American Rescue Plan Act (aka ARPA) was supporting some Sewer Revenue Department operations at the time of the inspection. Young managed both Rosebud Sioux Tribe Rural Water System, also known as Sicangu Mni Wiconi, and Sewer Revenue Department operations, and indicated Sewer Revenue Department finances and other resources, such as vehicles, personnel, etc., were managed separately from Rural Water System resources. Young estimated approximately 90% of his time was spent on water operations, with approximately 10% of his time spent on wastewater operations.

According to information shared during the opening conference and included in the 2022 NOI, the facility served an estimated population of 650 in the community of Parmelee, with approximately 99% of wastewater originating from approximately 130 residences in the service area. According to information in the 2022 NOI, the facility also received septage from one septic company, estimated at less than 5,000 gallons per week and less than 20 days per month. The 2022 NOI also included an estimate of total average daily influent flow as 0.049 million gallons per day (MGD). Young and IHS representatives indicated water usage, and subsequently, wastewater flows, in the service area may have been greater than typically seen in similar communities because water was provided free to many users through the Rural Water System. Additionally, the Tribal Housing Authority encouraged residents to keep water running during the winter to prevent pipes from freezing.

The facility comprised a collection system with one lift station (43.327653, -101.026962) and a three-cell lagoon (influent manhole: 43.329203, -101.027794). Young stated operators visited the lift station and cleaned the trash basket on a daily basis, and the wet well was not pumped dry and cleaned on any planned or routine basis. All wastewater from the collection system gravity-flowed to the lift station, which pumped all wastewater to the lagoon. The lagoon cells were typically operated in series. According to design drawings for Cell 2 (IHS Project No. AB-88-279, Sheet 2 of 2, approved August 16, 1991, prepared by the IHS), reviewed after the inspection, two-valve level control structures were planned between Cell 1 and Cell 2 and between Cell 2 and Cell 3, and an effluent control valve was installed after Cell 3; however, the presence of any effluent control structure and discharge status of

the facility could not be verified during the inspection, discussed further in this section and in Finding 4. The design documents reviewed included plans for a clay liner in Cell 2. No information on the presence, composition, or condition of liners in Cell 1 or Cell 3 was reviewed as part of this inspection. During the opening conference, we discussed that, while no effluent flow measurement device was installed at the facility, average flow rates and total flow could be estimated for discharge events by performing calculations based on the dimensions of the lagoon, change in water level, and duration of discharge, assuming discharge could be controlled.

According to information in the 2022 NOI, Parmelee was historically served by a single cell lagoon (now Cell 3), constructed around 1967 (IHS Project AB-67-958); to accommodate more houses, a second cell (now Cell 1) was constructed around 1977 (IHS Project AB-76-431) and a third cell (now Cell 2) was constructed around 1989 (IHS Project AB-88-279). Presumably, the lift station was constructed in conjunction with Cell 1, although this was not explicitly stated in the 2022 NOI and I was not able to confirm this during my review of engineering records associated with the facility. Information in the 2022 NOI also indicates the lagoon had a maximum average design flow of 0.052 MGD at a 180 day retention time. It is noted that, while information provided in the 2022 NOI suggests the lagoon may not have been designed for total retention given the estimated flows, based on information in EPA databases and discussions with Young and IHS representatives during the inspection, the facility had not been discharged in at least 5 years prior to the inspection. Based on this information and inspection discussions and observations, infiltration or discharge could have been occurring from Cell 3.

We did not have time to review monitoring and reporting records during the inspection, so I informed Young that, after the inspection, I would review monitoring information accessible via EPA databases (discussed further in Section 4) and request additional records via email, if needed. We then proceeded with the site review portion of the inspection. Young indicated neither he nor Sewer Revenue Department operators would be able to join for the field portion of the inspections, as they had other business to attend to, but that we could contact them if we had any questions throughout the day and request they meet us in the field, if needed. James indicated he would be able to accompany us on the field portion of the inspection and could provide access to the requested facilities. We then left the Water Resources Building and visited several other WWTFs operated by the Sewer Revenue Department before arriving at the subject facility.

We arrived at the subject facility at approximately 15:20 PM, beginning our facility observations at the lift station (Photographs 40-42). The interior of the lift station valve vault was flooded with what appeared to be wastewater (Photograph 40). Based on our review of the lift station control panel (Photograph 42), Pump 2 was operating on auto-mode, the seal failure light for Pump 2 was indicated, and the switch for Pump 1 was in the off-position. We were not able to determine why Pump 1 was not operating.

We also observed manholes, valve vaults, and piping configurations in the vicinity of the lift station. Based on our observations and discussions with James, it appeared piping could be configured to gravity flow all influent directly into Cell 3, but we confirmed this was not occuring at the time of the inspection. James mentioned septage may have sometimes been received at the lift station or directly above the lift station.

We then drove to the influent manhole of Cell 1, walked a portion of the perimeters of Cell 1 (Photograph 43) and Cell 2 (Photograph 44), and attempted to determine whether an effluent control valve present at the outfall from Cell 3 (Photographs 45-47). The presumed outfall location (eastern

portion of the north side of Cell 3) was identified by James based on his knowledge of the facility and aligned with design drawings reviewed after the inspection. The area around the presumed outfall location was overgrown with dense vegetation and we were not able to visually ascertain whether an effluent control structure was installed at the outfall (Photograph 47) or verify the discharge status of the cell. No water was maintained in Cell 3 (Photograph 46), indicating little water was being released from Cell 2 or infiltration or discharge could have been occurring from Cell 3. After reviewing the outfall area, we walked back to our vehicles and concluded the onsite portion of the inspection at approximately 16:20 PM.

4.0 Post-Inspection Activities and Conclusion

After the inspection, I reviewed facility design drawings accessed via the IHS Sanitation Tracking and Reporting System (STARS) database and various records and data in EPA files and databases. No monitoring data was returned for the duration of the Permit effective period during my search of the EPA's Integrated Compliance Information System and Central Data Exchange databases, conducted on December 20, 2022.

Findings, requested corrective actions, and recommendations identified pursuant to this inspection are included in the section below.

Findings, Corrective Actions, and Recommendations

Finding 1:

At the lift station, the switch for Pump 1 was in the off-position (Photograph 42). We were not able to determine why Pump 1 was not operating.

Permit Requirements:

Part 6.5 of the Permit (Proper Operation and Maintenance) states:

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.

Similar requirements are included in Part 6.6 of the 2022 LGP.

Corrective Action 1:

Ensure two operational pumps are installed at the lift station and are configured to run in accordance with applicable lift station O&M recommendations (e.g. alternating lead-lag configuration or other configuration recommended in the lift station O&M manual). In a response, provide a description of how this corrective action was completed and the date of completion.

Finding 2:

At the lift station, the seal failure light was indicated for Pump 2, the only operating pump.

Often, seal failure alarms are able to detect early seal failure and are intended to prompt servicing to prevent pump failure.

Permit Requirements:

Part 6.5 of the Permit (Proper Operation and Maintenance) states:

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.

Similar requirements are included in Part 6.6 of the 2022 LGP.

Findings, Corrective Actions, and Recommendations

Corrective Action 2:

Investigate the cause of the seal failure light indicated for Pump 2 and perform any repairs necessary to ensure two operational pumps are installed at the lift station and are configured to run in accordance with applicable lift station O&M recommendations (e.g. alternating lead-lag configuration or other configuration recommended in the lift station O&M manual). In a response, provide a description of how this corrective action was completed and the date of completion.

Finding 3:

The interior of the lift station valve vault was flooded with what appeared to be wastewater (Photograph 40).

Permit Requirements:

Part 6.5 of the Permit (Proper Operation and Maintenance) states:

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.

Similar requirements are included in Part 6.6 of the 2022 LGP.

Corrective Action 3:

Investigate and repair the source of this leaked wastewater to prevent further leakage into the valve vault, allow access, operation, and maintenance of the valves, prevent overflows of leaked sewage from the valve vault that could potentially result in unauthorized discharges of pollutants, minimize damage to piping, valves, or other facility components, and minimize health and safety risks to operators. In a response, provide a photograph of the drained and repaired valve vault, a description of how this corrective action was completed, and the date of completion.

Finding 4:

The area around the presumed location of the outfall from Cell 3 was overgrown with dense vegetation and we were not able to visually ascertain the presence or condition of any effluent control structure at the outfall (Photograph 47), whether Cell 3 may discharge via uncontrolled overflow, or the discharge status of the facility.

Permit Requirements:

Part 4.1 of the Permit (No Discharge Requirement) states:

Findings, Corrective Actions, and Recommendations
Effective immediately and lasting through the life of this permit, there shall be no discharge except in accordance with the bypass provisions of this permit. If an unauthorized release occurs or is expected to occur, the permittee shall take the appropriate measures to minimize the discharge of pollutants (see Part 6.7). Part 4.3 of the Permit (Inspection Requirements) states: 4.3.1 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 information: (see Appendix D for Example Lagoon Inspection Form)… 4.3.1.4. The facility[y'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 4.2 and 5.4.3 of this permit if not already done.); 4.3.1.7. Is there is any leakage through the dikes… Similar requirements are included in Part 6.5 of the 2022 LGP. Part 6.5 of the Permit (Proper Operation and Maintenance) states: 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… 6.5.5. Keep the dikes mowed on a regular basis during the growing season or as needed (e.g., keep growth below 6" in height). Similar requirements are included in Part 6.6 of the 2022 LGP. **Corrective Action 4:** Safely clear vegetation around the presumed outfall location to allow visual verification of whether an effluent control structure is present and access to the area for routine inspection, operation, and maintenance. If an effluent control structure is present, determine its condition, the number and status of any valves, and discharge status. If a discharge is occurring, conduct monitoring in accordance with the requirements of the 2022 LGP.

Findings, Corrective Actions, and Recommendations
In a response, provide photographs of the cleared presumed outfall location and, if present, any effluent control structure; if present, provide a description of any effluent control structure, including its condition, the number and status of any valves, and discharge status; and provide the date this corrective action was completed.

Finding 5:

Weekly inspections were not conducted and recorded in accordance with the Permit.

This was also alleged as a violation of previous NPDES permit requirements and the Clean Water Act in the 2016 AOC (Paragraphs 35 and 38 of the 2016 AOC).

Permit Requirements:

Part 4.3 of the Permit (Inspection Requirements) states:

4.3.1 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 information: (see Appendix D for Example Lagoon Inspection Form)

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[y'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 4.2 and 5.4.3 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;
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.

4.3.2. 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).

Findings, Corrective Actions, and Recommendations
4.3.3. Problems identified during the inspection shall be listed with corrective action and a time frame to correct the issue. Example: repair cracks in North berm, remove animal and repair burrow, within 7 days. (See Part 6.5 of this permit.) Similar requirements are included in Part 6.5 of the 2022 LGP. **Corrective Action 5:** Conduct and record weekly inspections in accordance with Part 6.5 of the 2022 LGP. In a response, provide a copy of at least two consecutive weekly inspection records containing all the information required by the 2022 LGP.
Finding 6: Trees were observed growing in the berms around all three lagoon cells (Photographs 43-47). Tree growth in lagoon berms can cause weakening of the berms, prevent thorough visual inspections and identification of potential problems, create seepage pathways, and reduce wind action over the lagoon. This was also alleged as a violation of previous NPDES permit requirements and the Clean Water Act in the 2016 AOC (Paragraph 34 of the 2016 AOC). **Permit Requirements:** Part 6.5 of the Permit (Proper Operation and Maintenance) states: 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… 6.5.4. 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). Similar requirements are included in Part 6.6 of the 2022 LGP. **EPA Guidance:** The following EPA guidance materials advise against allowing trees to grow around lagoons and provide potential options for removal and prevention.

Findings, Corrective Actions, and Recommendations
• *Principles of Design and Operations of Wastewater Treatment Pond Systems for Plant Operators, Engineers, and Managers*, EPA, August 2011 https://www.epa.gov/sites/default/files/2014-09/documents/lagoon-pond-treatment-2011.pdf • *EPA Compliance Advisory: Compliance Tips for Small Wastewater Treatment Lagoons with Clean Water Act Discharge Permits*, EPA, March 2011 https://www.epa.gov/system/files/documents/2022-03/lagoon-complianceadvisory.pdf **Corrective Action 6:** In accordance with Part 6.5 of the Permit, safely remove any rooted plants from the water. In a response to the EPA, provide photographs demonstrating this corrective has been completed and the date of completion; or, if this corrective action is not feasible during winter conditions, provide a plan and a schedule for completing this corrective action once weather conditions permit.
Finding 7: Septage may have sometimes been received at the lift station or directly above the lift station. **Recommendation:** To minimize potential damage to lift station pumps, the EPA recommends maintaining a dedicated septage dumping station at or near the point where influent enters Cell 1, after the lift station. No response is requested pursuant to this recommendation.