

NPDES Tribal Wastewater Lagoon

National Database Information	
Inspection Date: November 16, 2023	Inspection Type: CEI-Lagoon General Permit
Entry/Exit Time: 13:00 – 14:30	NPDES ID Number: MTG589301
SIC Code: 22132–Sewage Treatment Facility	Inspection ID: 202311_MTG589301
Lead inspector and affiliation: Lisa-kay Prideaux, U.S. EPA Region 8, Montana Office	

Facility Location Information	
Site/Facility Name & Location: St. Ignatius Wastewater Treatment Facility Town of St. Ignatius Flathead Reservation, Montana 47.323100°N, 114.103682°W	Email Report to: Scott Morton, Public Works Director Town of St. Ignatius Publicworks@townofstignatius.com

Contact Information	
	Name(s)/Title
Facility Contacts:	Scott Morton, Public Works Director, Town of St. Ignatius (present)
Tribal Representative(s):	None
Person/Company meeting definition of “Operator”	Town of St. Ignatius
Responsible Official(s)	Scott Morton, Public Works Director, Town of St. Ignatius (present)
IHS Contacts:	Richard Racine / Tribal Utility Consultant / Indian Health Service (not present)

Permit Information	
Is the permit on site and available? Yes	Individual or General Permit: General
Effective Date: January 1, 2016	Expiration Date: December 31, 2020 Administratively extended
Latitude: 47.323100°N	Longitude: 114.103682°W
Receiving Water(s): No Discharge – Land Application	
Weather Conditions: Overcast, 46°F	
Regulatory Inspector’s source of information: General permit for Lagoon Discharges, Statement of Basis, Authorization letter, previous inspection report, Integrated Compliance Information Systems (ICIS), Enforcement & Compliance History Online (ECHO), facility representatives and field observations.	

Areas Evaluated During Inspection		
<u>Permit</u>	<i>Effluent/Receiving Waters</i>	<i>Compliance Schedule</i>
<u>Records/Reports</u>	<i>Flow Measurement</i>	<i>Pollution Prevention</i>
<u>Facility Site Review</u>	<i>Self-Monitoring Program</i>	<i>Laboratory</i>
Report Review and Signature		
Drafter	Address/Phone Number	Date
 Digitally signed by Prideaux, LisaKay Date: 2024.03.13 08:45:29 -06'00'	U.S. EPA Region 8, Montana Operations Office Prideaux.Lisakay@epa.gov	03/11/2024
	406-457-5022	
Reviewer Name	Address/Phone Number	Date
Stephanie Passarelli	U.S. EPA Region 8 Passarelli.stephanie@epa.gov	03/08/24
	303-312-6803	
Management Signature/Name	Address/Phone Number	Date
 Digitally signed by EMILIO LLAMOZAS Date: 2024.03.11 15:46:59 -06'00'	U.S. EPA Region 8 Llamozas.Emilio@epa.gov	03/11/2024
	Emilio Llamozas	

Inspection Narrative and Site Description

On Thursday, November 16, 2023, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux conducted a compliance evaluation inspection of the St. Ignatius wastewater treatment facility (facility), located in the Town of St. Ignatius (the Town), Montana, on the Flathead Reservation. The facility is a publicly-owned treatment works (POTW) comprising of a wastewater collection system, two lagoon areas, and a land application area, owned and operated by the Town. The purpose of the inspection was to evaluate the facility's compliance with the Clean Water Act and National Pollutant Discharge Elimination System (NPDES) permit number MTG589301. The facility is permitted under the 2016 NPDES Lagoon General Permit (2016 General Permit) as a "no discharge" facility. The 2016 General Permit expired on December 31, 2020; EPA Region 8 issued a new General Permit (2022 General Permit) which became effective on April 1, 2022, and will expire on March 31, 2027. The Town has not submitted a notice of intent (NOI) to be covered under the 2022 General Permit. The EPA notified the Confederated Salish & Kootenai Tribes (CSKT) of the inspection in a letter sent September 14, 2023, and I coordinated the inspection with St. Ignatius representative Scott Morton, Public Works Director, several days in advance.

The inspection commenced at approximately 13:00, when Lisa-kay arrived at the facility and presented credentials to Mr. Morton and had an opening conference to explain the purpose of the inspection. Throughout the inspection, observations and photograph descriptions were documented. All photographs taken during the inspection are included in the attached photo log and are maintained by EPA in accordance with the Quality Assurance Field Activities Procedure and Standard Operating Procedure.

In 1944, the Town constructed its first wastewater treatment system. In 2007, the Town relocated the wastewater treatment system to its current location and structure. The treatment system serves a population of approximately 786 primarily residential homes. There is no industry in the service area. The facility consists of a gravity flow collection system, two lift stations, three treatment lagoon cells, and a land application area in two different areas. The primary treatment area consists of one aerated and one facultative lagoon cells, a lift station, blower building, and generator, all located off Highway 93. The secondary treatment area is approximately 2 miles northwest of Old Freight Road and consists of a lift station, quiescent lagoon cell, irrigation pump system, and land application area.

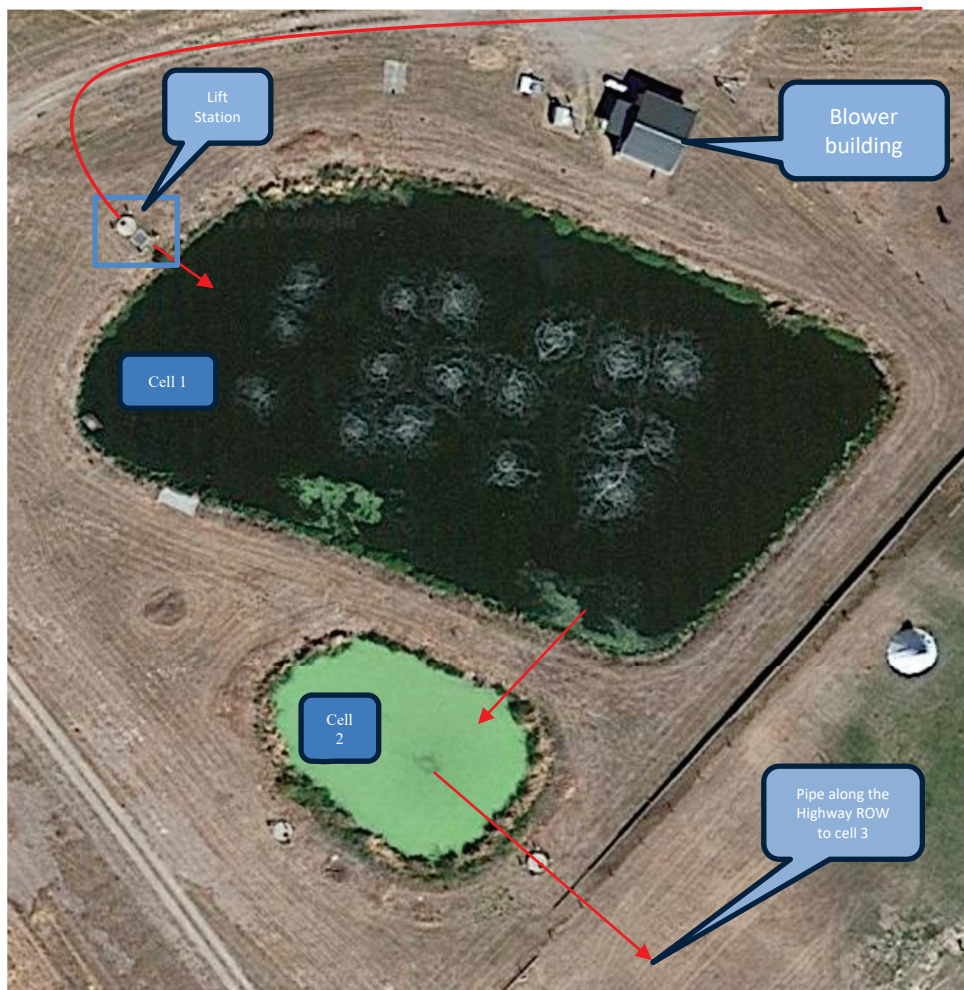
Mr. Morton and I then had a conversation regarding the status of permit and application, wastewater operations, operations and maintenance program, weekly inspections, collection system with problem areas, future growth and upgrades, capacity of current system, and equipment needs and funding.

As we walked the primary treatment area, Mr. Morton stated the Town's collection system gravity flows to the on-site lift station (photo 826). The lift station runs on a float system and has an emergency call out system if a float is not functioning or overwhelmed. The influent is lifted into an aerated primary cell (Cell 1). Cell 1 is approximately 0.87-acres with 18 aerators (photos 827-829). Water then gravity-flows from Cell 1 into a smaller quiescent cell (Cell 2), which is approximately 0.17-acres in size (photo 830). I noted some vegetation and small shrubs starting to form around and inside of the dike walls of cell 1, and significant cattail growth in cell 2. The top of the dike walls and surrounding area vegetation were trimmed, and no rodent damage or erosion rills were noted. Also, in the primary treatment area there is

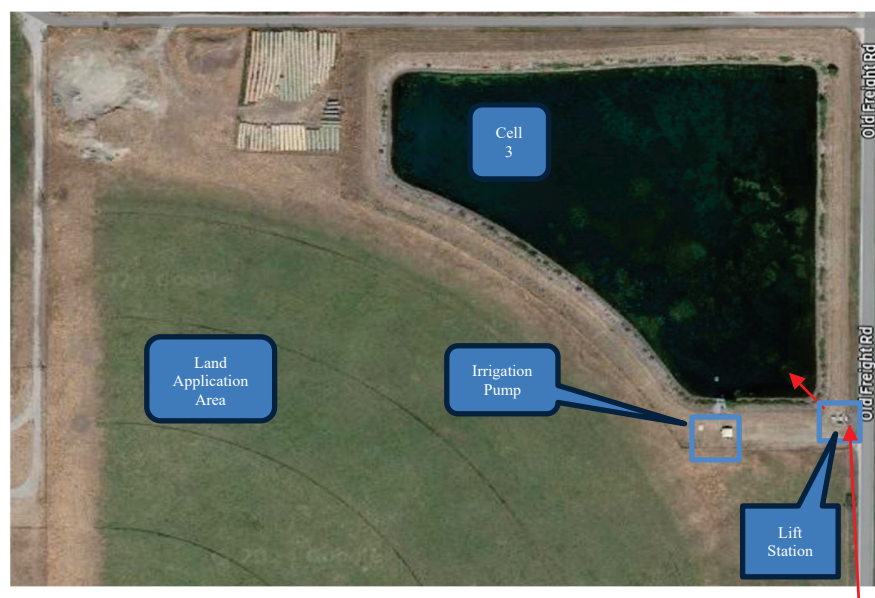
a blower building for the aerators in cell 1 as well as a generator for the system in case of power outages. The generator is automatically exercised biweekly for 30 minutes each time. Mr. Morton stated the generator is run at full load periodically through the year. From Cell 2, water gravity flows into and through a 6-inch diameter subsurface pipe conveying wastewater approximately 2 miles northwest to the secondary treatment area. We then drove to the secondary treatment area. At this treatment area, wastewater enters a second on-site lift station, which operates on a float system and has an emergency call-out (photo 831). The lift station pumps wastewater into Cell 3 (photos 832-834). Cell 3 is approximately 8.4 acres in size and does not have an outlet structure. It was noted, the area surrounding the lagoon cell was not maintained and had trees and small shrubs growing within the dike walls. From Cell 3, wastewater is pumped to the adjacent land application area, where wastewater is periodically land applied via a 1,085-foot irrigation pivot (photos 835-837).

A closing conference was held on-site with Mr. Morton, during which I discussed preliminary findings, as well as the process for completing and providing the inspection report. The inspection concluded at approximately 14:30.

Primary Treatment Area:



Secondary Treatment Area



Findings, Corrective Actions and Recommendations

Finding #1: Inspections are conducted but not documented as required.

Specifically, the permittee is conducting weekly inspections, but not documenting the required elements listed below in Part 4.3.1 of the 2016 General Permit.

Permit requirement:

Part 4.3.1 of the 2016 General 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.
- 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.”

Part 4.3.2 of the 2016 General Permit states, “the permittee shall maintain the notebook in accordance with required record-keeping items and shall make the log available for inspection, upon request, by authorized representatives of the EPA or the applicable Tribe.”

Part 4.3.3 of the 2016 General Permit states, “any 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.”

Part 6.1 of the 2016 General Permit states, “the permittee must comply with all conditions of this permit. Any failure to comply with the permit may constitute a violation of the Clean Water Act and may be grounds for enforcement action, including, but not limited to permit termination, revocation and reissuance, modification, or denial of a permit renewal application.”

Corrective Action:

Ensure lagoon inspections are conducted and reports are written to document observations against all required permit elements. Implement corrective actions identified during inspections within the required timeframe. In the response to this report, provide EPA with a description of the corrective actions taken to address this finding. A template inspection report is included as an attachment for use, if preferred.

Finding #2: Unmaintained vegetation within lagoon cells.

Specifically, the facility’s lagoon dike walls were covered in unmaintained vegetation as well as vegetation growing within the water line of the lagoon cells. Excessive vegetation growth was observed along the edges and growing within cells 1 and 2 (photos 827-830) and thicker vegetation/shrubs/trees were growing in lagoon cells 1 and 3 (photos 828, 829 and 833). When vegetation is unmaintained, it is difficult to assess the health of the lagoon dike walls for erosion, leaks, slumps, and burrowing animal damage. Heavy thick roots from the wrong type of flora can compromise the integrity and greatly inhibit or degrade the dike walls as well as puncture liners creating leaking lagoons.

Permit requirements:

Part 6.5 of the 2016 General Permit 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. 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;

6.5.4. 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).”

Part 6.1 of the 2016 General Permit states, “the permittee must comply with all conditions of this permit. Any failure to comply with the permit may constitute a violation of the Clean Water Act and may be grounds for enforcement action, including, but not limited to permit termination, revocation and reissuance, modification, or denial of a permit renewal application.”

Corrective Action:

Remove vegetation growing within the lagoon cells. In the response to this report, provide EPA with a description of the corrective actions taken to address this finding. Provide photographic evidence documenting the correction of each deficiency.

Finding #3: Application for coverage under the 2022 Lagoon General Permit has not been submitted.

The facility is permitted under the 2016 General Permit as a “no discharge” facility. The 2016 General Permit expired on December 31, 2020; however, the facility’s authorization was administratively continued because a new General Permit had not been issued at the time the 2016 General Permit expired. The EPA Region 8 issued a new General Permit (2022 General Permit) which became effective on April 1, 2022, and will expire on March 31, 2027. On March 18, 2022, the EPA issued an email to all currently covered facilities, with a copy of the application (Notice of Intent (NOI)) for coverage under the 2022 General Permit, and a copy of the NOI submission instructions. The EPA email stated “the application period to reapply for coverage under the [2022 General Permit] is April 1, 2022, through June 30, 2022. Failure to submit an NOI by the deadline may result in a gap in permit coverage.” The town of St. Ignatius has not submitted an NOI for its wastewater facility.

Permit Requirement:

Part 7.4 of the 2016 General Permit states if a permittee wants to retain coverage under the continued permit until a new general permit is issued, the permittee must submit a letter containing the following:

- 7.4.1. Name, address, and telephone number of the operator of the facility;
- 7.4.2. The existing permit number for the facility; and,
- 7.4.3. A request that the facility be provided coverage under the continued permit until a new general permit is issued.

The letter must be signed in accordance with Part 7.7, Signatory Requirements.

Corrective Action:

Submit an NOI to the EPA for coverage under the 2022 General Permit. The 2022 General Permit electronic NOI form can be found at: <https://www.epa.gov/npdes-permits/region-8-npdes-lagoon-general-permit>. In the response to this report, provide EPA with the date on which the NOI was submitted.