



# **NPDES Compliance Inspection Report**

## **Town of Odessa Sewer Treatment Plant Odessa, Washington**

**Permit #: WA0045560**

**Inspection Date: May 5, 2021**

Prepared by:

Jon Klemesrud  
U.S. Environmental Protection Agency, Region 10  
Enforcement & Compliance Assurance Division  
Water Enforcement & Field Branch  
Field, Data & Drinking Water Enforcement Section

Signature/Date:

Supervisor Signature/Date:

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ATTACHMENT A - Aerial Image (Google Earth)

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(All details in this report were obtained through conversations with Rod Webster, Jim Williams, Anthony Paszkeicz or from observations made during the inspection.)

## I. Facility Information

Facility Name: Town of Odessa Sewer Treatment Plant (Odessa STP)

Facility Owner/Operator: Town of Odessa

Physical Address: West of N. Birch Street, North of State Route 28  
Odessa, Washington 99159

Lat/Long: 47.334075, -118.699679

Mailing Address: Town of Odessa  
P.O. Box 218  
Odessa, Washington 99159

NAICS Code: 221320 (Sewage Treatment Facilities)  
SIC Code: 4952 (Sewerage Systems)

Facility Contacts: Rod Webster, Public Works Director  
Odessa Public Works  
Phone: (509) 982-2201  
Email: pwd@odessaoffice.com

Jim Williams  
Odessa Public Works  
Phone: (509) 982-2201  
Email: opwjim@odessaoffice.com

Anthony Paszkeicz  
Odessa Public Works  
Phone: (509) 982-2201

William Crossley, Mayor  
Town of Odessa  
Phone: (509) 982-2401

Permit Number: WA0045560

Receiving Water: Crab Creek

## II. Inspection Information

Inspection Date: May 5, 2021

Inspectors: Jon Klemesrud, Inspector  
EPA Region 10, ECAD /FDDWES

Other Individuals: Art Jenkins, PE, Permit Unit Supervisor  
Water Quality Program, Eastern Regional Office  
Washington Department of Ecology

Arrival Time: 10:00 AM

Departure Time: 1:15 PM

Purpose: To determine facility compliance with the Clean Water Act and the State of Washington National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit.

### III. Permit Information

The Town of Odessa Sewer Treatment Plant (“Facility”) is permitted under Washington Department of Ecology (Ecology) National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit # WA0045560. The Facility’s permit became effective on June 11, 2010 and was administratively continued after it expired on June 30, 2015. The permit was modified twice in 2013, the modifications included removing the S9 requirement to conduct a Dye Study and adding clarifying language within permit section S2A, Monitoring Schedule. Ecology received the Facility’s most recent renewal application on December 29, 2014.

### IV. Background

The Town of Odessa owns and operates an extended aeration wastewater treatment plant with Ultraviolet (UV) disinfection. The treatment plant is located on a bluff along the northwestern edge of town. An aerial image is attached to this report (**Attachment A**) for a general footprint of the WWTP. The collection system is a separated sanitary sewer system, comprised of gravity lines that feed a low-pressure grinder pump system. There are approximately 250 grinder pumps used in the collection system network.

The treatment facility is a packaged system manufactured by Aero-Mod, Inc. and was constructed in 1999. Odessa has an estimated resident population of 1100. The Facility has an average daily flow of approximately 51,000 gallons per day and discharges continuously throughout the year. According to the Permit Fact Sheet, the design flow of the facility is approximately 200,000 gallons per day. The receiving water, Crab Creek, is seasonal with flow typically only 3-4 months of the year.

In addition to municipal wastewater, the collection system receives approximately 200 gallons-per-day (GPD) from a single industrial user, CPoW Livestock Processors Cooperative Association, a local beef processor. The industrial user holds an Ecology State Waste Discharge Permit (No. ST0045530). According to the Facility, the industrial user recently modified their drainage network and is no longer contributing blood from the processing line into their discharge.

According to EPA’s Enforcement and Compliance History Online (ECHO), the Facility is in a significant non-compliance (SNC) status based on continued/historic effluent limit violations.

The Facility was most recently inspected by Ecology on May 23, 2019 and November 29, 2017. On September 11, 2020, the Facility was issued a Warning Letter (**Attachment B**) by Ecology for 20 months of permit violations for effluent limit exceedances of ammonia, dissolved oxygen, total suspended solids, and fecal coliform. The Warning Letter also addressed missing and late submittals of permit required Wasteload Assessments and Operations & Maintenance Manual updates.

The Facility submitted a response to the September 11, 2020 Warning Letter (**Attachment C**). The response provided the steps made to prevent future violations, including hiring an additional employee and utilizing technical support services from Ecology and Evergreen Rural Water of Washington.

In 2019 the Town of Odessa contracted with Century West Engineering to prepare a General Sewer Plan (Plan). The purpose of the Plan was to assess the condition of the existing sewer system and plan for the current and future needs over a 20-year planning period. The Plan was approved by Ecology on December 16, 2019 and is available for review on Ecology's Water Quality Permitting and Reporting Information System's (PARIS) website.

## V. Inspection Chronology

This was an announced inspection. On April 26, 2021, I spoke with Mr. Rod Webster, Odessa Public Works Director, and lead operator at the WWTP. I stated that I'd been asked to conduct an NPDES compliance inspection of the Odessa STP in coordination with Ecology. We agreed to meet at the Public Works Office on May 5, 2021, at 10:00am. We discussed that I would be joined on the inspection by Mr. Art Jenkins of Ecology.

Once arrived at the Public Works Office on May 5<sup>th</sup>, 2021, Art Jenkins and I met with Facility representatives inside of the main operations/maintenance building adjacent to the WWTP. The inspection included an opening conference, a walk-through of the treatment system and in-house laboratory, a records review, and a closing conference.

For the walk-through, we observed general operations, process flow, sampling locations, solids handling, the in-house laboratory and single outfall. We were allowed to inspect all areas requested.

The record review occurred inside the operations/maintenance building; a portion of the record review occurred post-inspection.

The closing conference occurred just prior to our observation of the outfall and took place inside of the operator/maintenance building. During the closing conference, I discussed my observations from the walk-through and from the initial records review. I also provided a copy of EPA's Small Business Resource Information Sheet and an EPA WWTP Compliance Advisory Handout.

## VI. Opening Conference

The opening conference was held inside of the operations/maintenance building shortly after our arrival. In addition to Mr. Webster, we were also joined by facility representatives Mr. Williams and Mr. Paszkeicz.

We had our initial introductions, I provided a business card and presented my EPA credentials to the group. I discussed the purpose and expectations of the inspection.

During the opening conference, Mr. Webster provided general information about current operations and recent improvement projects. Mr. Webster holds a current Level II wastewater treatment certification and has been in his current role for approximately 10 years. In addition to Mr. Webster, wastewater operations are currently supported by Mr. Williams and Mr. Paszkeicz, all of have Public Works duties outside of the WWTP. Mr. Paszkeicz was hired in September of 2020 and working towards his Level II certification.

According to Mr. Webster, Ecology's Andy O'Neill (Technical Assistance Provider) and Chad Short of Evergreen Rural Water of Washington (Wastewater Technician) are also contacted as needed for support relating to operations and compliance.

## VII. Site Review

Following the opening conference, we observed the grinder pump repair room to begin our facility walk-through. Photographs used in this inspection report taken during the walk-through, including a complete photo log appears in **Attachment D**.

For the walk-through of the Facility operations, we were joined by Mr. Webster, Mr. Williams, and Mr. Paszkeicz. Mr. Webster also joined us when viewing the outfall following the closing conference.

Wastewater collection and treatment at the Facility consist of the following processes:

1. PVC sewer collection pipes
2. Low pressure E/One Extreme grinder pump collection system
3. One main lift station to the WWTP and two lift stations (wet well) that support the collection system (Crab Creek & North Branch).
4. Influent Screening (two Hydrasieve screens)
5. Selector Tanks (A & B)
6. Aeration (primary and secondary basins)
7. Clarification (primary and secondary)
8. Aerobic Digester Tanks (A & B)
9. Sludge handling
10. UV Disinfection
11. Discharge to Crab Creek via underground pipe (outfall 001)

Our walk-through began inside the operations/maintenance building where we observed the grinder pump repair room. The Facility is responsible for the repair and maintenance of the 250 (approximate) grinder pumps used in the collection system. The E/One Extreme grinder pumps are located at residences and business and deliver wastewater to the force main through a service line. According to Facility staff, much of their time is spent repairing and servicing these pumps.

We continued the walk-through to the headworks; a new influent flow meter was installed/calibrated in November of 2020. The Facility has two hydrasieve screens to remove larger material and grit. Removed screenings from the influent are bagged, dewatered, and sent to the landfill. The hydrasieve screens (**Photo 1**), are located within the southern end of the operations/maintenance building. Influent composite samples required monthly by the permit are taken by a SIGMA 900 composite sampler located near the screens, inside of the operations/maintenance building.

Within the operations/maintenance building, the blower room houses three blowers that feed the WWTP. Two of the blowers are in operation and one is kept as spare. According to Mr. Webster, the Facility recently replaced sheaves on the blowers and have since noticed improved performance and efficiencies. A window air-conditioning unit was also recently installed in the blower room to help control temperatures.

We continued the walk-through to the Aero-Mod WWTP, effluent flow from the screens combine with return activated sludge (RAS) and discharges to the primary aeration basin (**Photo 2**), which flows by gravity to the secondary aeration/anoxic basin (**Photo 3**). The effluent flows into the clarifier and then is discharged to the UV disinfection system (**Photo 4**). The underflow returns to the aeration basin as RAS or is wasted into the aerated digester tank. Waste solids go into the bagging system. According to Mr. Webster the Facility changed their bagging system from small bags to large totes approximately 18 months ago. Dewatering from the solids area is captured by a drain on the concrete slab (**Photo 5 & 6**) and returned to in the influent of the WWTP. Solids are hauled as needed to Barr-Tech Composting near Fishtrap, WA.

Effluent from the UV system discharges to a Parshall Flume and this is routed downhill via underground pipe the outfall within Crab Creek (**Photo 7**). Effluent composite samples required by the permit are taken by a SIGMA 900 sampler located near the UV system.

According to Mr. Webster, the plant is currently performing well and credits recent success to on-site technical support provided by Mr. O'Neill and Mr. Short. Adjustments were recently made to the Food-to-Microorganism (F/M) ratio and with the improved blower performance the WWTP is operating much more efficiently.

The Facility has an in-house laboratory within a section of the operations/maintenance building. Dissolved Oxygen (DO) and pH are analyzed in-house by Facility staff using a Hach HQ series DO meter and a Hach Pocket Pro+ pH meter.

According to the Facility, the DO and pH meters are calibrated weekly. Calibration records are recently documented on a corresponding clipboard mounted next to each device (**Photo 8**). Calibration reagents were current.

Remaining monitoring parameters (TSS, BOD5, Ammonia, Fecal Coliform), required either once every two weeks or monthly are analyzed by Anatek Labs, Inc. in Spokane, WA. Monitoring results are submitted by the Facility to Ecology's Water Quality Permitting and Reporting Information System (PARIS).

According to Mr. Webster, up until March of 2021 the Facility was utilizing AAA Lab, Inc. located in Cheney, WA for their contract lab. Since changing labs, the Facility has seen Ammonia effluent results to be much lower and in compliance with the permit. Ammonia had typically been a parameter the Facility had been struggling to meet the effluent limit.

## VIII. File Review

Following our walk-through of the WWTP and on-site laboratory, I reviewed the following records and documents as part of this inspection:

- Operation and Maintenance (O&M) Manual – the Facility had the Aero-Mod O&M manual on-site, dated 5/12/1999. The manual was not reviewed at the time of inspection, but verified it was on-site.
- Plant Flow Plan (Diagram)
- DO/pH Bench Sheet Data (2021)
- Laboratory Results and Discharge Monitoring Reports (DMRs) for months selected at random: April 2021, March 2021, October 2020, July 2019, November 2018. The analytical documents were reviewed post inspection.
- General Sewer Plan (December 2019) prepared by Century West Engineering. The document was reviewed post inspection.
- Wasteload Assessments (2019 - 2017)
- Operations and Maintenance Manual Update or Confirmation Letter (2019 – 2017)

## IX. Areas of Concern

The following areas of concern were noted as part of this inspection:

### A. Effluent Limit Exceedances

Part S1. A. of the permit states, “the discharge of any of the following pollutants more frequently than, or at a level in excess of, that identified an authorized by this permit violates the terms and conditions of this permit”

The September 11, 2020 Warning Letter issued by Ecology (**Attachment B**) documented 26 effluent limit exceedances that were reported between January 1, 2019 and August 31, 2020. The exceedances were for ammonia, dissolved oxygen, total suspended solids, and fecal coliform. Since September 1, 2020 (thru May 5, 2021), the Facility has reported 8 effluent limit exceedances, all for ammonia:

Table 1.

| <b>Date:</b>     | <b>Parameter :</b>      | <b>Permit Limit</b> | <b>Reported Value</b> |
|------------------|-------------------------|---------------------|-----------------------|
| February 1, 2021 | Ammonia Monthly Average | 1.7 lbs/day         | 2.85 lbs/day          |
| February 1, 2021 | Ammonia Monthly Average | 1 mg/L              | 7.4 mg/L              |
| January 1, 2021  | Ammonia Monthly Average | 1 mg/L              | 4.7 mg/L              |
| January 1, 2021  | Ammonia Monthly Average | 1.7 lbs/day         | 1.95 lbs/day          |
| December 1, 2020 | Ammonia Monthly Average | 1 mg/L              | 1.55 mg/L             |
| November 1, 2020 | Ammonia Monthly Average | 1 mg/L              | 1.75 mg/L             |
| October 1, 2020  | Ammonia Monthly Average | 1 mg/L              | 1.05 mg/L             |

|                   |                         |        |           |
|-------------------|-------------------------|--------|-----------|
| September 1, 2020 | Ammonia Monthly Average | 1 mg/L | 2.95 mg/L |
|-------------------|-------------------------|--------|-----------|

As stated earlier in this report, according to the Facility, the plant is currently performing well and credits recent success to the on-site technical support provided by Mr. O'Neill and Mr. Short. The technical assistance included adjusting the Food-to-Microorganism (F/M) ratio and Sequox cycling.

In addition to the technical assistance, the Facility has changed their contract laboratory to confirm sample analysis is managed to the proper standard.

As stated earlier in this report, significant man hours are spent repairing and servicing the grinder pumps within the collection system. With the hiring of Mr. Paszkeicz in September of 2020, more attention can be spent on the operation of the WWTP.

## **B. Recording Elements of pH Monitoring**

Within Part S3.C. of the permit, it states for each measurement or sample taken, the Permittee must record: "1. The date, exact place, method, and time of sampling or measurement. 2. The individual who performed the sampling or measurement. 3. The dates the analyses were performed. 4. The individual who performed the analyses. 5. The analytical techniques or methods used. 6. The results of all analyses."

At the time of inspection, it was noted that for pH the Facility was only recording the value and date of the monitoring/analyses (**Photo 9**). We discussed the permit requirement at the time of inspection and the Facility stated that they will begin recording all of the required monitoring elements moving forward.

## **C. Calibration and O&M Records**

Within Part S3.B. of the permit, it states "the permittee must maintain records of all monitoring information for a minimum of three (3) years. Such information must include all calibration and maintenance records...."

Within Part S2.C of the permit it states for flow measurement, "maintain calibration records for at least three years".

Within Part S5.B.2 of the permit states "keep maintenance records on all major electrical and mechanical components of the treatment plant, as well as the sewerage system and pumping stations. Such records must clearly specify the requirement and type of maintenance recommended by the manufacturer and must show the frequency and type of maintenance performed."

At the time of inspection, it was noted that calibration and maintenance records were not kept or maintained prior to March/April 2021. The facility recently started a new practice of documenting calibration of their pH and dissolved oxygen monitoring equipment. A

logbook is also kept of general daily operations. Calibration records for the Facility's flow meters were not being maintained.

We discussed the permit requirement at the time of inspection, and the Facility stated that they will begin recording calibration and maintenance events for permit required monitoring events moving forward.

## **X. Closing Conference**

Following the walk-through of the Facility, a closing conference was held with Mr. Webster, Mr. Williams, and Mr. Paszkeicz. I discussed my inspection observations including the Areas of Concern. I also reminded the facility of the permit requirement to submit the O&M certification letter and wasteload assessment annually.

I then thanked them for their time and cooperation with the inspection. Following the closing conference, we toured the outfall to Crab Creek.

# ATTACHMENT A

## Aerial Image (Google Earth)



# **ATTACHMENT B**

## **September 11, 2020 Warning Letter**



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

4601 N. Monroe Street • Spokane, Washington 99205-1295 • (509) 329-3400

September 11, 2020

The Honorable Bill Crossley  
Town of Odessa  
P.O. Box 218  
Odessa, WA 99159-0218

RE: Warning Letter for National Pollutant Discharge Elimination System Permit WA0045560

Dear Mayor Crossley:

The Town of Odessa is out of compliance with National Pollutant Discharge Elimination System permit WA0045560 that was issued June 1, 2010. The Town has numerous discharge monitoring report (DMR) violations, permit limit exceedances, unreported or missing samples, late submittal of DMRs and other submittals and has failed to report the violations to Ecology as required by their NPDES/SWDP. Below is an explanation of the violations.

**1. Effluent Limit Violations**

Between January 1, 2019 and August 31, 2020, Odessa has generated 26 effluent limit violations in the WQWebDMR database for ammonia, dissolved oxygen, total suspended solids and fecal coliform.

Section S1.A of the permit authorizes the discharge of municipal wastewater at the permitted location subject to compliance with effluent limitations set in the permit.

**2. Reporting Noncompliance**

Section S3.E of Odessa's permit requires the facility to notify Ecology immediately when they violate or are unable to comply with permit conditions. The facility must follow up with a written report within five days that includes the description of the noncompliance and its cause, and actions taken to prevent reoccurrence of noncompliance. Over the last two years, Odessa did not report permit violations to Ecology. Each failure to report constitutes a separate violation in the permit.

**3. Missing Submittals**

Special Condition S4.E of Odessa's permit requires that an annual assessment of influent flow and wasteload be conducted and a report submitted each year by April 1<sup>st</sup>. To date, the Wasteload Assessment due April 1, 2020 has not been received by Ecology.

**4. Late Submittals**

The Summary of Permit Report Submittals specifically lists required permit submittals during the current five year permit cycle and their reporting schedule. Odessa was late submitting four DMRs (Permit Section S3.A), and three required submittals, Wasteload Assessment due April 30, 2019 and Operations & Maintenance Manual updates due April 1, 2019 and April 1, 2020. Each late submittal constitutes a separate violation of the permit.

### **Contact with the Facility**

The Department of Ecology had the following communications with Odessa regarding the permit violations.

- June 2, 2020 – Ecology permit manager email to Odessa requesting missing permit submittals to be submitted.
- June 9, 2020 – Ecology permit manager email to Odessa requesting missing permit submittals to be submitted a second time.
- July 30, 2020 – Ecology permit manager email to Odessa requesting a noncompliance notification for June ammonia violations.
- August 4, 2020 – Ecology permit manager email to Odessa offering contact information for technical assistance for WebDMR/PARIS questions.
- September 8, 2020 – Ecology permit manager email to Odessa with a reminder of reporting requirements for permit violations.

### **Within 30 days from receipt of this warning letter, please provide the following to Ecology:**

1. Submit a written report explaining the cause of the violations identified in this letter.
2. Identify the steps taken to prevent future violations.

Send the report electronically to Rob Buchert, Senior Compliance Specialist at [rbuc461@ecy.wa.gov](mailto:rbuc461@ecy.wa.gov) or by mail at Water Quality Program, Department of Ecology, 4601 N. Monroe Street, Spokane, Washington 99205-1265.

This warning letter is to make you aware of the importance the Department of Ecology places on the legal implications of noncompliance with the limits, monitoring requirements, and terms and/or conditions established in your permit.

Continued noncompliance will result in formal enforcement action by Ecology. Formal enforcement action may include Notice of Violation, Administrative Order, and Penalties of up to \$10,000 per day per violation.

Please contact the Region's wastewater operator technical assistance provider, Andy O'Neill at (509) 710-3676 or [aone461@ecy.wa.gov](mailto:aone461@ecy.wa.gov) if you need technical assistance or have questions about operator certification.

The Honorable Bill Crossley  
Town of Odessa  
September 11, 2020  
Page 3 of 5

Please contact me at (509) 329-3536 or [rbuc461@ecy.wa.gov](mailto:rbuc461@ecy.wa.gov) if you have questions regarding this warning letter or Ecology's enforcement process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Buchert".

Rob Buchert  
Senior Compliance Specialist  
Water Quality Program  
Eastern Regional Office

RB:sj

cc. Rod Webster, Town of Odessa  
Diana Washington, PE, Ecology Permit Manager Eastern Region  
Andy O'Neill, Ecology Technical Assistance Eastern Region  
Art Jenkins, PE, Water Quality Permit Unit Supervisor Eastern Region

**Table 1: Detailed List of Violations from January 1, 2019 through August 31, 2020**

| Monitoring Month | Monitoring Point | Monitoring Parameter | Unit    | Statistical Base | Value Entered | Limit      |
|------------------|------------------|----------------------|---------|------------------|---------------|------------|
| July 2020        | 002              | Ammonia              | mg/L    | Average monthly  | <b>2.25</b>   | <b>1</b>   |
| June 2020        | 002              | Ammonia              | mg/L    | Average monthly  | <b>3.85</b>   | <b>1</b>   |
| May 2020         | 002              | DO                   | mg/L    | Daily sample     | <b>6.3</b>    | <b>6.5</b> |
|                  | 002              | DO                   | mg/L    | Daily sample     | <b>6.4</b>    | <b>6.5</b> |
|                  | 002              | DO                   | mg/L    | Daily sample     | <b>6.2</b>    | <b>6.5</b> |
|                  | 002              | Ammonia              | mg/L    | Average monthly  | <b>4.15</b>   | <b>1</b>   |
| April 2020       | 002              | Ammonia              | mg/L    | Average monthly  | <b>6.15</b>   | <b>1</b>   |
|                  | 002              | Ammonia              | mg/L    | Average monthly  | <b>2.2</b>    | <b>1</b>   |
| March 2020       | 002              | Ammonia              | mg/L    | Average monthly  | <b>13.35</b>  | <b>1</b>   |
|                  | 002              | Ammonia              | mg/L    | Average monthly  | <b>4.7</b>    | <b>1</b>   |
| February 2020    | 002              | Ammonia              | mg/L    | Average monthly  | <b>10.95</b>  | <b>1.0</b> |
|                  | 002              | Ammonia              | lbs/day | Average monthly  | <b>4.2</b>    | <b>1.7</b> |
| January 2020     | 002              | Ammonia              | mg/L    | Average monthly  | <b>1.55</b>   | <b>1</b>   |
| December 2019    | 002              | Ammonia              | mg/L    | Average monthly  | <b>3.05</b>   | <b>1</b>   |
| October 2019     | 002              | Ammonia              | mg/L    | Average monthly  | <b>10.7</b>   | <b>1</b>   |
|                  | 002              | Ammonia              | lbs/day | Average monthly  | <b>4.35</b>   | <b>1.7</b> |
| September 2019   | 002              | Ammonia              | mg/L    | Average monthly  | <b>8.1</b>    | <b>1</b>   |
|                  | 002              | Ammonia              | lbs/day | Average monthly  | <b>3.15</b>   | <b>1.7</b> |
| August 2019      | 002              | Ammonia              | mg/L    | Average monthly  | <b>2</b>      | <b>1</b>   |
| July 2019        | 002              | Ammonia              | mg/L    | Average monthly  | <b>4.95</b>   | <b>1</b>   |
|                  | 002              | Ammonia              | lbs/day | Average monthly  | <b>2.05</b>   | <b>1.7</b> |

| Monitoring Month | Monitoring Point | Monitoring Parameter | Unit     | Statistical Base | Value Entered | Limit |
|------------------|------------------|----------------------|----------|------------------|---------------|-------|
|                  | 002              | TSS                  | mg/L     | Weekly average   | 32            | 30    |
| June 2019        | 002              | Ammonia              | mg/L     | Average monthly  | 3.65          | 1     |
| April 2019       | 002              | Ammonia              | mg/L     | Average monthly  | 1.15          | 1     |
| March 2019       | 002              | Fecal Coliform       | #/100 mL | Average monthly  | 475           | 200   |
|                  | 002              | Fecal Coliform       | #/100 mL | Weekly average   | 900           | 400   |

|                                 |           |  |
|---------------------------------|-----------|--|
| <b>Total Numeric Violations</b> | <b>26</b> |  |
|---------------------------------|-----------|--|

| Submittal Type                | Date Due | Date Submitted |
|-------------------------------|----------|----------------|
| Wasteload Assessment for 2019 | 4/1/2020 | Not received   |
| O&M Manual Update             | 4/1/2020 | 8/24/2020      |
| Wasteload Assessment 2018     | 4/1/2019 | 4/30/2019      |
| O&M Manual Update             | 4/1/2019 | 8/24/2020      |

| DMR Month & Type         | Date Due  | Date Submitted |
|--------------------------|-----------|----------------|
| March 2020 Monthly DMR   | 4/15/2020 | 4/28/2020      |
| January 2020 Monthly DMR | 2/15/2020 | 2/18/2020      |
| April 2019 Monthly DMR   | 5/15/2019 | 5/17/2019      |
| January 2019 Monthly DMR | 2/15/2019 | 3/5/2019       |

**Table 2: Total Number of Violations from January 1, 2019 through August 31, 2020**

| Late Submittal            | #         |
|---------------------------|-----------|
| Late DMRs                 | 4         |
| Late Permit Submittals    | 3         |
| Missing Permit Submittals | 1         |
| <b>Violations</b>         |           |
| Numeric violations        | 26        |
| <b>Total</b>              | <b>34</b> |

# **ATTACHMENT C**

## **Response to September 11, 2020 Warning Letter**

William Crossley, Mayor  
Meri Jane Bohn, Clerk-Treasurer  
Brent Dell, Marshal  
Rod Webster, Public Works Director



PO Box 218  
Odessa, WA 99159-0218  
Phone: 509-982-2401  
Fax: 509-982-2410  
TTY 1-800-833-6388

### **Town of ODESSA, Washington**

Water Quality Program Department of Ecology  
c/o Rob Buchert, Senior Compliance Specialist  
4601 N Monroe St.  
Spokane, WA 99205-1265  
[Rbuc461@ecy.wa.gov](mailto:Rbuc461@ecy.wa.gov)

- 1) **Effluent Limit Violations** - Ammonia levels are being worked on with help of Andy O'Neil, Dept of Ecology and Chad Short, Evergreen Rural Water. They will also work with the new employee.
- 2) **Reporting Noncompliance** - New trainee for Waste Water Treatment Plant is training for Public Works Director position. The key focus of new employee at Waste Water Treatment Plant includes compliance, reporting and process control.
- 3) **Missing Submittals** - City has hired a new employee for help at the Waste Water Treatment Plant.
- 4) **Late Submittals** – City has hired a new employee for help at the Waste Water Treatment Plant. This should alleviate missing and late submittals due to man power shortage.

Sincerely,

*Rodney B Webster*

Rod Webster  
Public Works Director  
Town of Odessa

# **ATTACHMENT D**

## **Photograph Log**

All photographs taken by Jon Klemesrud on May 5, 2021

Nikon Coolpix AW100

## Photo Log – Odessa STP



Photo #:01 (DSCN2127)  
Description: Facing northeast, photo of the two hydrasieve screens



Photo #:02 (DSCN2134)  
Description: Facing southwest, photo of the first stage aeration basin.



Photo #:03 (DSCN2135)  
Description: Facing northeast, photo of the first and second aeration basins from above the surge tank.



Photo #:04 (DSCN2128)  
Description: Photo of the UV disinfection system.

### Photo Log- Odessa STP



Photo #:05 (DSCN2129)

Description: Facing northeast, photo of the covered solids area used for dewatering.



Photo #:06 (DSCN2136)

Description: Facing southwest, photo of the solids handling area and dewatered totes set for removal.



Photo #:07 (DSCN2146)

Description: Photo of the outfall to Crab Creek.

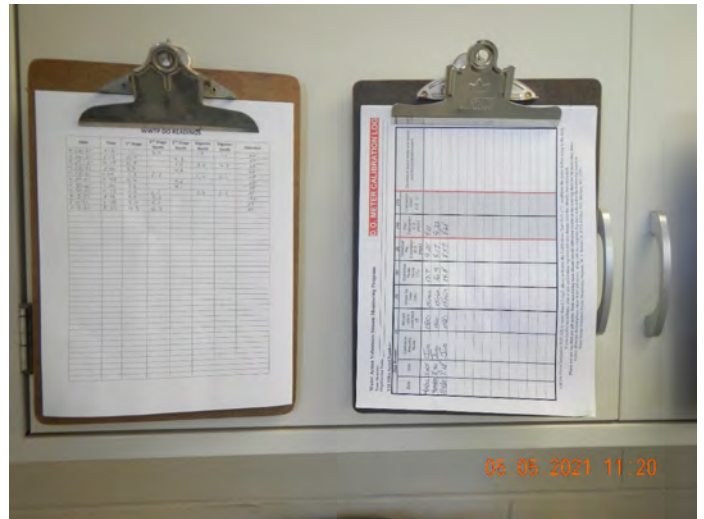


Photo #:08 (DSCN2138)

Description: Photo of the "D.O. Meter Calibration Log" and "WWTP DO Readings" log

### Photo Log- Odessa STP

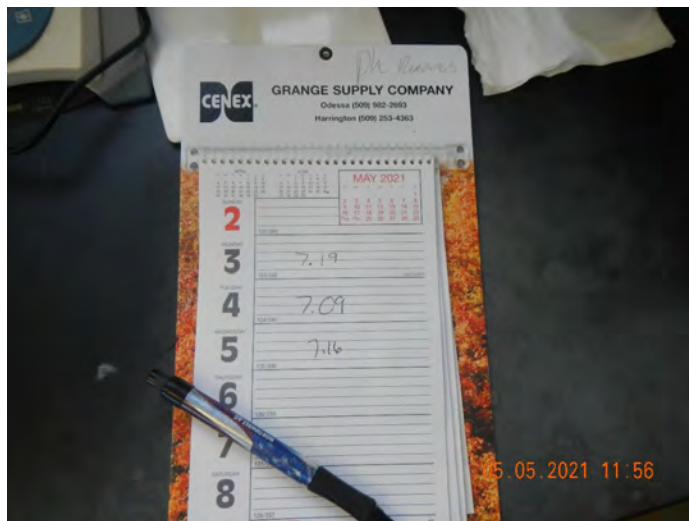


Photo #:09 (DSCN2143)

Description: Photo of the pH readings bench sheet log.

### Complete list of photographs taken during the inspection:

- DSCN2127 – Facing northeast, photo of the two hydrazine sieve screens.
- DSCN2128 – Photo of the UV disinfection system.
- DSCN2129 – Facing northeast, photo of the covered solids area used for dewatering.
- DSCN2130 – Facing east, photo of the decommissioned solids dewatering bagging system. Totes are now used instead of the smaller bags.
- DSCN2131 – Facing east, photo of the facility's Aero-Mod Polymer tank.
- DSCN2132 – Photo of the effluent manhole and flow meter.
- DSCN2133 – Facing west, photo of selector tank A.
- DSCN2134 – Facing southwest, photo of the first stage aeration basin.
- DSCN2135 – Facing northeast, photo of the first and second aeration basins from above the surge tank.
- DSCN2136 – Facing southwest, photo of the solids handling area and dewatered totes set for removal.
- DSCN2137 – Facing west, overview photo of the WWTP.
- DSCN2138 – Photo of the "D.O. Meter Calibration Log" and "WWTP DO Readings" log
- DSCN2139 – Photo of the April 2021 bench sheet used to populate the DMR.
- DSCN2140 – Photo of the October 2020 bench sheet used to populate the DMR.
- DSCN2141 – Photo of the July 2019 bench sheet used to populate the DMR.
- DSCN2142 – Photo of the November 2018 bench sheet used to populate the DMR.

- DSCN2143 – Photo of the pH readings bench sheet log.
- DSCN2144 – Photo of the Aero-Mod Plan View.
- DSCN2145 – Photo of the outfall to Crab Creek.
- DSCN2146 – Photo of the outfall to Crab Creek.