

NPDES Inspection Report

National Database Information	
Inspection Date: 07.23.2024	Inspection Type: Reconnaissance Inspection
Entry/Exit Time: 07:57 / 08:10	NPDES ID Number: Unpermitted
NAICS Code:	Inspection ID: 202407_Homestead
Lead inspector and affiliation: Lisa-kay Prideaux, U.S. EPA Region 8, Montana Operations Office	
Inspector and affiliation:	

Facility Location Information	
Site/Facility Name & Location: Homestead Inn Annex 6201 A N 1 Drive Wolf Point, Montana 59201	Email Report to: Jim O'Connor homesteadinnmotel@gmail.com

Contact Information	
	Name(s)/Title
Facility Contacts:	Jim O'Connor, Owner of Homestead Inn Annex
Person/Company meeting definition of "Operator"	Jim O'Connor, Owner of Homestead Inn Annex
Authorized Official(s)	Jim O'Connor, Owner of Homestead Inn Annex
Tribe Representative(s)	None present
Indian Health Service Representative(s)	None present

Permit Information		
Is the permit on site and available? N/A	Latitude: 48.098924	Longitude: -105.626325
Receiving Water(s): unnamed drainage swale; groundwater via infiltration		
Regulatory Inspector's source of information: Aerial imagery, Montana Cadastral, Tribal representatives phone conversations and emails, and field observations.		

Areas Evaluated During Inspection		
<u>Permit</u>	<u>Effluent/Receiving Waters</u>	<u>Compliance Schedule</u>
<u>Records/Reports</u>	<u>Flow Measurement</u>	<u>Discharge Monitoring Reports</u>
<u>Facility Site Review</u>	<u>Monitoring Program</u>	<u>Lift Station Operation and Maintenance</u>
<u>Collection System Review</u>	<u>Lagoon Self- Inspections</u>	<u>Preventive and Emergency Operation and Maintenance</u>

Report Review and Signature		
Drafter Signature/Name	Address/Phone Number	Date
Prideaux, LisaKay Digitally signed by Prideaux, LisaKay Date: 2024.11.15 12:24:46 -07'00'	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626	10.17.2024
Lisa-kay Prideaux	406-457-5022	
Management Signature/Name	Address/Phone Number	Date
EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2024.11.13 11:00:11 -07'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-NW Denver, Colorado 80202	10/22/2024
Emilio Llamozas	303-312-6407	

Inspection Narrative and Site Description

Introduction and Background

The Homestead Inn Annex (Annex) is a former hotel that was converted into long-term affordable housing and is privately owned, however Montana Cadastral lists the Wolf Point Lodging Group, LLC as the property owner. The Annex has 22 rooms and housed approximately 70-75 people.

On Thursday, February 9, 2023, Fort Peck Assiniboiné and Sioux Tribes (Tribes) Office of Environmental Protection (OEP) representative Wilfred Lambert, Brownfields Program, shared with EPA Region 8 representative Kimberly Varilek, Tribal Affairs Branch Director, that there was a hotel in Wolf Point with a septic leak that was potentially flowing into a nearby creek. On February 10, 2023, several separate phone conversations between EPA and Wilfred Lambert, Megan Brown, Manager of the Homestead Inn and Homestead Inn Annex, and Jim O'Connor, Owner of the Homestead Inn and Homestead Inn Annex, revealed the following information:

- The release had been occurring for at least several weeks, as Wilfred had visited the facility on or around January 26, 2023, in response to complaints received about the release.
- Septic effluent was surfacing behind (south of) the hotel and flowing south. Due to snow-covered ground, Wilfred was not able to verify the extent of the release, or whether it was reaching any surface waters.
- Some surface drainages in the vicinity of the release typically filled with water in the spring.
- The subject property had been converted from a hotel to long-term housing at least several months prior, and was managed by the Homestead Inn, a hotel in Wolf Point.
- Wilfred had discussed the incident with Homestead Inn staff.
- The septic release began backing up into apartment units. In response, Homestead Inn staff had attempted to dig around the area of the drainfield using hand shovels, with the intent of performing an investigation and repairs; however, they were unable to make significant progress due to frozen ground conditions.
- To stop sewage from backing up into units and allow tenants to continue using water, a relief valve from the drainfield had been opened.
- The septic system is comprised of a 1,000-gallon primary tank (pumped approximately 2020), a 4,000-gallon secondary tank (staff refer to as a 'cistern'), and a pressurized drain field. Float switches in the cistern triggered periodic pumping of wastewater from the cistern to the drainfield. The relief valve from which effluent was discharged was located at the end of the drainfield, after wastewater had flowed through most of the septic system.

Also, on February 10, 2023, Wilfred emailed documentation of GPS coordinates and photographs of the release (taken from his visit on or around January 26, 2023) (photos shown in photo log as the first 6 photos).

On Tuesday, July 23, 2024, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux, conducted an announced reconnaissance inspection to evaluate actions taken by the hotel owner were conducted, and the threats to public health and the environment were resolved. The inspection commenced at approximately 07:57, when Lisa-kay arrived at the facility, and knocked on the hotel entrance door. There was no answer and the premises appeared deserted. The inspector drove around the back of the facility and noted there were no vehicles present nor any signs of occupancy. The inspector did not knock on every door. The inspector found out after the inspection, through a phone

call to the hotel, that it is still open and available for occupancy. Throughout the site visit, 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.

The inspector proceeded to walk around the area south of the building indicated as the drain field in photos and aerial photography. The area of the drain field was recently mowed/mulched (photo 12). The standpipe as well as lateral line areas were all dry with no 'spongy' feel or appearance of recent standing water or overflow. The inspector walked to the southeast corner of the drainfield where there was a pad of gravel and a white PVC pipe protruding (photo 13). The gravel had mature weeds growing through it, indicating it had not been placed recently. The pipe appeared to be coming from the direction of the leach field and/or the hotel (photo 14). A quick investigation around the hotel was done to see if there was a PVC pipe connected to the air conditioners or rain gutters occurred, finding none. The gravel area was dry except for directly under the pipe outlet; however, it was not wet enough to indicate it had been running. It was noted that a rag was located on the gravel just downstream of the outlet pipe, no other debris was noted (photos 13 & 14). The gravel pad extended approximately 20 feet downhill toward the natural drainage, the inspector walked along the downhill end of the gravel and did not note any moisture on the surface or immediate subsurface of the ground.

After the inspector completed walking the drain field, they went back to the front of the building and left a business card in the door. The inspector left the site at 08:10.

Findings, Corrective Actions and Recommendations

Finding #1: Septic System Failure

Specifically, the septic system failed creating an overflow event recorded in January 2023.

Regulatory requirements:

The Clean Water Act (33 U.S.C. §1251 et seq. (1972)) establishes the basic structure for regulating discharges of pollutants into the waters of the United States (WOTUS). The Clean Water Act made it unlawful to discharge any pollutant from a point source into a WOTUS. Point sources are discrete conveyances such as pipes. Individual homes that are connected to a municipal system, use a septic system do not require a NPDES discharge permit; however, operating and maintain the septic system as designed is required so it does not become a point source discharge.

Corrective Action:

Submit a written description of the events that occurred resulting in the overflow, how long the overflow lasted, did the overflow reach surface waters, and all repairs and/or improvements made to the septic system to ensure the septic system does not fail again. Submit the date the septic system repairs were completed. In the response to this report, provide EPA and the Tribes OEP with a description of the corrective actions taken to address this finding.