EPA United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	11/08/2023 10:20 AM (PT)	Announced: No
Inspection Exit Date/Time	11/08/2023 03:10 PM (PT)	Access: Granted
Weather	55°F, Sunny	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	City of Rainier	
Facility Name	Rainier Sewage Treatment Plant	
Facility Address	106 West 6th Street	
City, State, Zip Code	Rainier, Oregon 97048	
County	Columbia	
Facility GPS Coordinates	46.091976, -122.943336	
FRS ID	110006696478	
Permit Number	OR0020389	
SIC	4952 (Sewage Treatment)	

Lead Inspector:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS Date: 2024.01.08 08:58:44 -08'00'

Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252

Supervisor Review:

PETER CONTRERAS Digitally signed by PETER CONTRERAS Date: 2024.01.08 10:28:40 -08'00'

Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Rainier Sewage Treatment Plant (the "Site" or "Facility"), located at 106 W 6th St, Rainier, Oregon, at 10:20 AM (PT) on 11/08/2023 for an unannounced inspection. I presented my credentials to Sue Lawrence and informed her I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA), and the facility's National Pollutant Discharge Elimination System (NPDES) permit, permit # OR0020389. This report is based on information supplied by the City of Rainier representatives, my direct observations, and records and reports maintained by the permittee. In addition, information gathered prior to or after the Inspection from a review of EPA, State, 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 10	Raymond Andrews	Lead Inspector	Yes	Yes
City of Rainier	Sue Lawrence	Public Works Director (Outgoing)	Yes	Yes
City of Rainier	Patrick McCoy	Public Works Director (Incoming)	Yes	Yes
City of Rainier	Alexandria Acevedo	Operator	Yes	Yes
City of Rainier	Jerry Cold	Mayor	Yes	Yes
City of Rainier	W. Scott Jorgensen	City Administrator	Yes	Yes

Facility Information

Responsible Official	Mayor Jerry Cold; mayor@cityofrainier.com
STP Service Population	The facility serves a population of approximately 2,075.
Industrial Users?	The facility does not receive waste from industrial users.
Does the facility accept waste from septage haulers?	The facility receives an average of 2,500 gallons per day (gpd) of septage. The additional waste does not affect the system's functioning.
Hours of Operation	The facility is staffed Monday through Friday from 0800 until 1630. On Saturdays and Sundays, the facility is staffed for two hours for routine checks. An on-call operator is available 24/7 to address any problems that arise during off hours.
What type of failure alarm does the plant have?	The facility has a supervisory control and data acquisition (SCADA) system which sends a message to the on-call operator if a problem is detected.
STP Design Capacity & Average Daily Flow	The facility has a design flow capacity of 1.03 million gallons per day (mgd) with an average daily dry weather flow of 0.33mgd, and an average daily wet weather flow of 0.75mgd.
Types of primary flow measuring devices?	Influent flow is measured with a Parshall Flume and level. Effluent flow is measured with a V-notch weir. The flow measuring devices are inspected weekly.
Receiving Water	Columbia River
Number of Outfalls	The facility has a single outfall.

How often do you visually inspect the outfall?	The outfall discharge point is 20 feet underwater, so the facility is unable to make a direct observation of the outfall.
How do you manage your biosolids?	Biosolids are collected and hauled to Wasco County landfill.
Has there been any bypasses or overflows in the last year?	The facility has not had any unreported bypasses or overflows in the past 12 months.
Does the facility have back-up power?	The facility has emergency generators that automatically start in the event of a power failure. The generators power the entire facility.
Are there any plans for renovation or additional equipment to allow for increased wastewater flow?	The facility is in the planning stages of implementing facility upgrades to increase flow capacity.
Is any part of the facility non-operational?	The facility is fully operational.
Does the facility conduct laboratory analysis in-house?	The facility analyzes most parameters in-house. A contract lab conducts quarterly analysis of alkalinity. Total Kjeldahl Nitrogen (TKN) and ammonia are sent to the contract lad annually for analysis. The contract lab is: ALS Group USA, Corp. dba ALS Environmental 1317 South 13th Avenue Kelso, Washington 98626 (360) 577-7222

SECTION II – Records Review

Records may not be in sequential order.

Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		**AOC:** Yes
Ref #: RA1-RR-007	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/08/2023

I reviewed information submitted by the facility to EPA's ICIS database for the period from November 2018 through October 2023.

I found the facility exceeded effluent parameters 418 times over a 10-month period during the time reviewed. Those exceedances can be found in Appendix 2, Table 1.

During the review of the information in ICIS, I found the facility missed schedule deadlines for three documents required by MAO # WQ/M-NWR-2022-044. The missed documents can be found in Appendix 2, Table 2.

Record: Other – Two ODEQ Enforcement Cases (WQ-M-NWR-2022-044 and WQ-M-NWR-2023-091)		**AOC:** No
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/08/2023

I reviewed two enforcement cases initiated by ODEQ against the City of Rainier.

The first, WQ-M-NWR-2023-044, was filed by ODEQ on January 9, 2023. This was a Mutual Agreement and Order (MAO) covered permit violations from October 2021 through November 2022. ODEQ issued a penalty of $52,650 to the facility, which was mitigated to $10,530 contingent upon completion of a Supplemental Environmental Project (SEP) by December 31, 2023.

After the first MAO had been finalized, ODEQ found additional permit violations, so the State issued a initiated a second administrative action.

The second action, WQ-M-NWR-2023-091, was filed by ODEQ on November 7, 2023. This action was a Notice of Civil Penalty Assessment and Order (NCPAO) covered violations from December 2022 through June 2023. The State issued a penalty of $31,500, which was mitigated to $6,310 contingent upon additional funds being allocated to the SEP agreed to in the MAO filed on January 9, 2023.

Per an ODEQ representative, an amendment to the initial MAO is forthcoming which will adjust the SEP deadline to September 30, 2024.

Record: Other - Emergency Response and Notification Plan		**AOC:** No
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/08/2023

Most of the plan was missing; started on page 20; Ms. Lawrence said she would look for a complete copy and if she can't find one, she will recreate it.

Record: Other - Certified Operator Report		**AOC:** No
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/08/2023

The report shows two certified operators:

Alexandria Acevedo, Collection Operator Grade I
John Dewey, Collection Operator Grade II, and Treatment Operator Grade II

Record: Laboratory Analysis Reports		**AOC:** No
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/08/2023

I reviewed random sampling of Lab Reports:

09/2020
12/2021
06/2022
02/2023

Record: Other - Biosolids Management Plan		**AOC:** No
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/08/2023

I reviewed the facility's Biosolids Management Plan, dated January 12, 2012. Plan needs to be updated. The copy of the plan I reviewed was unsigned and certified.

Record: Calibration Records		**AOC:** No
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/08/2023

I reviewed the Instrument Calibration Data Sheet -for July 2022. Calibrations were conducted by a contractor:

Buell Calibration & Controls
P.O. Box 722
Gresham, Oregon 97030
(5030 928-0264

SECTION III – Sampling Activities

No sampling was conducted.

SECTION IV – Areas 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 #: RA1-RR-007	**Records Review: Other - EPA's ICIS Database**
Permit Requirement **Schedule A.1.a-c** establishes effluent limitations that are not to be exceeded.	
AOC: The facility exceeded effluent parameters 418 times over a 10-month period during the period reviewed. Those exceedances can be found in Appendix 2, Table 1.	
AOC Reference #: RA1-RR-007	**Records Review: Other - EPA's ICIS Database**
Mutual Agreement and Order **Section II.11.A., Tasks 2.a, 3.a, and 3.b.i**	
AOC: I found the facility missed schedule deadlines for three documents required by MAO # WQ/M-NWR-2022-044. The missing required documents can be found in Appendix2, Table 2.	

SECTION V – Closing Conference

I held a closing conference with facility personnel at 03:10 PM (PT) on 11/08/2023. During the closing conference, I discussed my observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VI – List of Appendices

1. Photo Log
2. Missing Documents and Effluent Exceedance Tables

APPENDIX 1: Photo Log
All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Area of Concern are included in the inspection report.

- P1010851 – Laboratory Bench Sheet, dated November 8, 2023
- P1010852 – Instrument Calibration Data Sheet, Effluent Flowmeter, dated July 19, 2022
- P1010853 – Instrument Calibration Data Sheet, Effluent Flowmeter, dated July 13, 2021
- P1010854 – Instrument Calibration Data Sheet, Influent Flowmeter, dated July 19, 2022
- P1010855 – Biosolids Management Plane, dated, January 12, 2012, page 1
- P1010856 – Influent Auto-sampler
- P1010857 – Effluent Auto-sampler

APPENDIX 2: Missing Documents and Effluent Exceedance Tables

Table 1. Effluent Exceedance Areas of Concern

Month	Parameter	DMR Value	Permit Limit	Unit	Limit Type	# Violations
January 2020	TSS	15	10	mg/L	Mo Avg	31
January 2020	TSS	71	15	mg/L	Wkly Avg	7
January 2020	TSS	152.4	130	lb/d	Mo Avg	31
January 2020	TSS	423.3	250	lb/d	Daily Max	1
January 2020	TSS	584	190	lb/d	Wkly Avg	7
September 2020	TSS	12	10	mg/L	Mo Avg	30
September 2020	TSS	31	15	mg/L	Wkly Avg	7
September 2020	TSS	211	130	lb/d	Wkly Avg	7
September 2020	TSS	396.1	170	lb/d	Daily Max	1
October 2020	TSS	22	15	mg/L	Wkly Avg	7
October 2020	TSS	143.	130	lb/d	Wkly Avg	7
October 2020	TSS	229.8	170	lb/d	Daily Max	1
March 2021	pH	5.8	6	SU	Daily Min	1
August 2021	TSS	12	10	mg/L	Mo Avg	31
August 2021	TSS	23	15	mg/L	Wkly Avg	7
October 2021	BOD_5,20°C	19	15	mg/L	Wkly Avg	7
October 2021	BOD_5,20°C	149.4	130	lb/d	Wkly Avg	7
October 2021	BOD_5,20°C	260.1	170	lb/d	Daily Max	1
October 2021	TSS	113	10	mg/L	Mo Avg	31
October 2021	TSS	388	15	mg/L	Wkly Avg	7
October 2021	TSS	866.2	83	lb/d	Mo Avg	31
October 2021	TSS	3281	130	lb/d	Wkly Avg	7
October 2021	TSS	6255.8	170	lb/d	Daily Max	1
October 2021	Solids, susp % rmv	84.2	85	%	Mo Av Mn	31
December 2022	BOD, 5-day,20C	254.7	250	lb/d	Daily Max	1
December 2022	TSS	19	10	mg/L	Mo Avg	31
December 2022	TSS	48	15	mg/L	Wkly Avg	7
December 2022	TSS	194.6	130	lb/d	Mo Avg	31
December 2022	TSS	676	190	lb/d	Wkly Avg	7
December 2022	E. coli	2420	406	#/100mL	Daily Max	1
July 2023	pH	5.51	6	SU	Daily Min	1
July 2023	TSS	33	10	mg/L	Mo Avg	31
July 2023	TSS	85	15	mg/L	Wkly Avg	7
August 2023	pH	5.94	6	SU	Daily Min	1
September 2023	pH	5.93	6	SU	Daily Min	1

Table 2. Missing Scheduled Documents

Scheduled Date	Document
April 30, 2023	Report of Preliminary Findings of an Initial Wastewater Treatment Plan Flow and Load Capacity Evaluation
September 30, 2023	Proposal for an Interim Improvements Plan and Schedule
September 30, 2023	Report of Field Investigation with Maps and a Proposal for Initial Peak Flow Reduction Projects