



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA II BUILDING, 7TH FLOOR
ROUTE 165 GUAYNABO, PUERTO RICO 00968

September 20, 2021

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Roger E. Merritt
Executive Director
United States Virgin Islands Waste Management Authority (WMA)
3200 Demarara
Charlotte Amalie, V.I. 00802
Email: rmerritt@viwma.org

Re: Reconnaissance Inspection of the US Virgin Islands, Anguila Wastewater Treatment Plant and Sanitary Sewer System

Dear Mr. Merritt:

On August 31 and September 1, 2021, the United States Environmental Protection Agency (EPA) conducted Site Reconnaissance Inspections (RI) at the above referenced Waste Management Authority's (WMA) Anguila Wastewater Treatment Plant (WWTP), the Anguila Interceptor and the LBJ, FigTree, Barren Spot, Lagoon Street sanitary pump stations. The RIs were conducted pursuant the authority contained in Section 308 of the Clean Water Act, 33 U.S.C. § 1251 et seq., 40 CFR § 122.41(a)(2), & 1,2, 3, and in accordance with Agency wide acceptable guidance and procedures. WMA were represented by Victor Cozart, Anguila WWTP Plant Manager, Ronald Phillips and Nadine Norhanssen, Compliance Specialists for WMA.

Enclosed you will find the Inspection Report. The RI report indicates that certain noncompliance items or deficiencies exist, which should be corrected to ensure compliance with the Clean Water Act and the National Pollutant Discharge Elimination System ("NPDES") Permit. In addition, there are certain areas of concern which are items that could be improved for better operation of the facility. Within thirty (30) calendar days of receipt of this letter, please respond with the actions that WMA has taken or will take to address the deficiencies included in the attached Water Compliance Inspection Report.

Should you have any questions feel free to contact me at (787) 977-5840.

Sincerely,

Jaime Geliga, Chief
Municipal Water Program Branch
Caribbean Environmental Protection Division

ATTACHMENT I

NPDES Inspection Report

OFF-SITE RECONNAISSANCE INSPECTION

Facility Name: Anguila WWTP and Collection System
NPDES Permit Number: VI0020036

I. BACKGROUND

A Reconnaissance Inspection (RI) was conducted on August 31 and September 1, 2021 at the Anguila Wastewater Treatment Plant (WWTP), the Anguila Interceptor and the Fig Tree, LBJ, Barren Spot and Lagoon Street pump stations. The RI consisted of an interview of WMA personal to discuss the purpose of the inspections and to request information about the facilities, review the operational and maintenance conditions, and a closing interview to discuss preliminary findings.

II. PLANT INFORMATION

WMA owns and operates the Harold Thompson (formerly named “Albert M. Nelthropp”) Publicly Owned Treatment Works (“POTW”) (also commonly referred to as the “Anguilla Wastewater Treatment Plant” (“WWTP”), which is located at 3A & 4A Bethlehem Middle Works, St Croix, USVI. This facility is a POTW within the meaning of a treatment work as defined by Section 212 of the Act, 33 U.S.C. § 1292(2)(A), that is owned by a State or municipality (as defined by section 502(4) of the Act).

III. FINDINGS

A. Anguila Wastewater Treatment Plant

- The three influent pump stations were in service
- The Grit removal system operates in manual mode at least three times per day.
- The influent flow meter was in service (1.2 MGD) at 9:30 am.
- Of the two primary clarifiers, 1 unit was out of service. See Photo #1.
- The clarifier in service was full of old sludge raising to the surface. See Photo #2.
- The two sludge transfer pumps were in service.
- The 3 Sequencing Batch Reactor units were in service.
- There are 24 sludge drying beds. Most off the units were full of dried sludge. See Photo #3.
- The effluent equalization tank lost its cover in 2017 and it has not been repaired. This creates the growth of algae inside the tank and affects the quality of the effluent. See Photo 4.
- Both effluent filters are out of service since an undetermined date.
- Although the UV disinfection system is in service, is operating with deficiencies. The facility violates the Fecal Coliform limit almost every month.
- The effluent flowmeter and sampling point were in service.

- The two sludge digesters were in service.
- There are some issues with very diluted BOD levels in the influent which creates BOD percent removal violations very frequently at the facility.
- Although the facility's permit does not establish a limit for Dissolved Oxygen, measured levels at the effluent showed very low levels around 3.6 mg/l on a constant basis.

B. Anguila Interceptor

- Several Manholes of the Anguila Interceptor were visited. The sewer lines were flowing with no obstruction and odors were not perceived.
- Information provided by WMA indicates that the diameter of the outlet pipe and the sanitary line in the manhole before the one located near the Air monitoring station # 1 is only 6 inches. WMA indicated that a project will be done to increase the pipe diameter to 10 inches.

C. LBJ Pump Station

- There was 1 diesel pump expecting to be installed.
- Two of the three house pumps were in service. Pump #2 was out of service with an issue with its check valve.
- The pumps' control panel are heavily corroded.
- The station alternate power unit was out of service due to a dead battery.
- Housekeeping practices at the pump station need improvement.

D. Fig Tree Pump Station

- Pump Station was recently rehabilitated.
- All three house pumps were in service.
- The mechanical bar screen was in service.
- The alternate diesel pump was undergoing repairs.
- The alternate power unit operates in manual mode.
- The station uses a scrubber as an odor control mechanism.
- Good housekeeping practices were observed.

E. Barren Spot Pump Station

- The two influent pumps were in service.
- The alternate diesel pump was in service.
- The fence around the station was broken.
- There is chemical addition being injected into the wet well for odor control. See picture #5
- The Alternate power unit was in service.
- The manhole cover inside the station is heavily corroded and must be changed.

F. Lagoon Street Pump Station

- One of the three house pumps was out of service.
- The Alternate power unit was out of service.
- The alternate diesel pump was repaired but it has not been installed.

- There was a rupture in the station force line that was repaired several months ago. However, the excavation for the repair had not been filled and is full of standing water. This creates a major hazard for employees and nearby residents. See picture #6.

VII. CONCLUSION

The inspection revealed that several operation units were out of service. Please note that **Part C.5 of Attachment I** of the permit requires the permittee to properly operate and maintain all facilities and systems for collection and treatment (and related appurtenances) which are installed or used to achieve compliance.

INSPECTOR SIGNATURE