NPDES Inspection Report – Wastewater Treatment Facility

National Database Information	
Inspection Date: July 1, 2021	**Inspection Type**: CEI – Wastewater Treatment Facility, Minor
Entry / Exit Time: 8:15am / 10:15am	**NPDES ID Number:** WYG589103
NAICS Code: 221320 (Sewage Treatment Facilities)	**Inspection ID:** 202107_WYG589103
Lead inspector and affiliation: Jessica Duggan / U.S. EPA Region 8	
Inspector and affiliation: Kristin Ratajczak / U.S. EPA Region 8	

Facility Location Information	
Site/Facility Name & Location: Saint Stephens Indian Mission 33 Saint Stephens Road Saint Stephens, Wyoming 82524 42.982286, -108.413124	**Email Report to:** Jon Esquibel and Melissa Brown Saint Stephens Indian Mission melissa.brown@saintstephensmission.com

Contact Information	
	Name(s)/Title
Facility Contacts:	Jon Esquibel / Maintenance / Saint Stephens Indian Mission (present)
	Melissa Brown / Secretary / Saint Stephens Indian Mission (not present)
Tribal Environmental Contacts	Northern Arapaho Tribe Natural Resource Office (not present)
Indian Health Service (IHS) Contacts	Quentin Allen / Engineer Consultant / IHS (not present)
Person/Company meeting definition of "Owner/Operator"	Saint Stephens Indian Mission
Responsible Official(s) – Signatures on DMRs	Melissa Brown / Secretary / Saint Stephens Indian Mission (not present)

Permit / Facility Information	
Is the permit on site and available? No; Inspectors emailed a copy of the permit on July 9, 2021	**Is the Facility under a compliance schedule?** No
Permit Effective Date: July 21, 2016	**Permit Expiration Date:** December 31, 2020; Administratively Continued
Lagoon Category: Subcategory C	**Monitoring Frequency:** Semi- Annual
Is correct contact information indicated on ICIS? No, operator and DMR Cognizant Official incorrect	**Indicate correct contact information:** Melissa Brown has been signing DMRs.
Receiving Water(s): Mission Ditch - Little Wind River	
Inspector's source of information: EPA records, permit, EPA's Integrated Compliance Information System database (ICIS), aerial imagery, facility representatives, facility records, and site review.	

Areas Evaluated During Inspection		
Permit	**Self-Monitoring Program**	Pretreatment
Records	Compliance Schedule	Pollution Prevention
Facility Site Review	Laboratory	Stormwater
Effluent/Receiving Waters	**Operations and Maintenance**	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow

Report Review and Signature		
Drafter Name	Date	Address/Phone Number
Jessica Duggan	**9/7/2021**	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202** **303-312-6195**
Reviewer Name	Date	Address/Phone Number
Kristin Ratajczak	**9/7/2021**	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202** **303-312-6310**
Management Reviewer Signature	Date	Address/Phone Number
MICHAEL BOEGLIN Digitally signed by MICHAEL BOEGLIN Date: 2021.09.08 06:20:52 -06'00'	**9/8/2021**	**U.S. EPA Region 8** **1595 Wynkoop Street** **8ENF-W-NW** **Denver, Colorado 80202** **303-312-6250**
Michael Boeglin, NPDES and Wetlands Enforcement Section Chief		

Inspection Narrative and Site Description

Introduction and Background

On Thursday, July1, 2021, U.S. Environmental Protection Agency (EPA) inspectors Jessica Duggan and Kristin Ratajczak (jointly referred to as inspectors), conducted a compliance evaluation inspection at the Saint Stephens Indian Mission wastewater treatment facility (WWTF, lagoon, facility, or Saint Stephens), located approximately 4.5 miles south of Riverton, Wyoming, on the Wind River Reservation. The facility was a publicly owned treatment works (POTW) comprising of a collection system, lift station, and lagoon system owned and operated by Saint Stephens Indian Mission. The purpose of the inspection was to evaluate compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit. The EPA is responsible for implementing the NPDES program in Indian Country within the State of Wyoming. The facility was covered under the EPA Region 8 NPDES Lagoon General Permit for Wastewater Lagoons in Indian Country with "Subcategory C - Semi-Annual Monitoring" authorization and facility-specific NPDES permit number WYG589103 (Permit).

The inspection was coordinated with the facility and the Northern Arapaho Tribe Resource Office, approximately two weeks in advance. The Tribe was notified of the inspection in a letter sent June 7, 2021. Throughout the inspection, inspectors noted observations and descriptions of photographs in bound checklists reflecting conditions of the permit. Photographs taken during the inspection of the Saint Stephens are included in the attached photo log (Photos 79-94).

Opening Conference and Discussion

On July 1, 2021, at approximately 8:15am, EPA inspectors met Jon Esquibel, Head of Maintenance, at the Saint Stephens Indian Mission. Inspectors presented their credentials and held a brief opening conference to explain the purpose of the EPA inspection. Inspectors began the inspection with an overview of the lagoon's service area, collection system, and operation and maintenance (O&M) of the facility. Mr. Esquibel informed inspectors that he knew nothing about the lagoon and was doing other maintenance work on the property for several years. Mr. Esquibel said the former operator was licensed but was no longer employed by Saint Stephens.

Facility Description and Process Overview

Saint Stephens is a three (3)-cell wastewater lagoon system and according the Mr. Esquibel all three cells were lined about 2 years ago (~2019). The influent from the Saint Stephens Church, five (5) homes, and church administrative building gravity flows to a manhole on the northwest corner of Cell 3 before flowing to the pump box/lift station and discharging into Cell 1. Influent from the Saint Stephens Indian School, including the cafeteria, gravity flows to the pump box/lift station, comingling with the wastestream from the northwest manhole, and flowing into Cell 1. Cell 1 is the primary cell and has two aerators. Wastewater flows through a valve box to Cell 2, and there is one aerator in Cell 2. Wastewater flows through a valve box to Cell 3 and Outfall 001C is located on the southeast side of Cell 3. Discharge through Outfall 001C flows via a buried pipe approximately 225 feet to the Mission Ditch – Little Wind River.

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Below is an aerial image of Saint Stephens Indian Mission.

Facility Review

EPA inspectors began the inspection by entering the fenced lagoon system from the northwest, near the church influent manhole (Photo 79 and 80). While inspectors observed the manhole from a distance, the vault structure surrounding the manhole did not appear structurally sound, and inspectors did not approach. As inspectors continued to walk around the lagoon perimeter, inspectors noted the location of the influent manhole from the school and pump house prior to Cell 1, but there were no tools available to open the structures (Photos 90 and 91).

Inspectors walked around all three lagoon cells and observed about 3-4 feet of freeboard, or volume capacity, in Cell 1 and Cell 2 (Photos 81, 83, and 86). At the time of the inspection, the aerators in Cell 1 and Cell 2 were not operating and the facility representative indicated they had not been operating all year (June 2020 – June 2021). The facility representative stated he tried to start the aerators the day before the inspection (June 30, 2021), but was unsuccessful and they would require an electrician to fix. At the time of the inspection, the valve boxes that connected flow from Cell 1 to Cell 2, and Cell 2 to Cell 3 had abundant biomass, algae, and solids/sludge accumulation in them (Photos 84, 85, 87, and 88). Inspectors observed abundant weeds, greater than 6 inches in height, on the dikes of Cell 3 (Photos 82 and 92) and trees growing in Cell 3 (Photo 81).

The outfall structure was a weir box on the southwest side of Cell 3 and the lagoon system was discharging during the EPA inspection (Photos 82, 92-94). The facility representative was aware of the discharge because he checked the lagoons the day before the inspection and it was discharging. The facility representative indicated he did not understand or know the NPDES discharge and monitoring

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requirements. No effluent samples were collected at the time of the inspection and there was no flow measuring device. The lagoon may have been discharging for approximately 6-8 months since a block from the outfall structure was removed in the "winter of 2020" (i.e., approximately November 2020 – June 2021).

Additional observations from the facility review are included in the attached photo log.

Records Review and Closing

Saint Stephens Indian Mission is authorized under NPDES permit WYG589103 as a Subcategory C – Semi-Annual Monitoring facility. According to the Discharge Monitoring Records (DMRs) reported to the EPA, the facility has been reporting No Discharge for every monitoring period since authorization began in July 2016, including the DMR submitted for January - June 2021.

In addition to DMRs, the facility has record keeping requirements for weekly inspections. The facility representative indicated that the lagoons are checked about 2-3 times per year; weekly inspections were not conducted and there were no weekly inspection records maintained by the facility. A copy of the current permit was not maintained with the records. Additionally, no O&M manual was available for the facility or collection system.

EPA inspectors conducted a closing conference and discussed preliminary findings with Mr. Esquibel on July 1, 2021.

Follow-Up

On July 9, 2021, EPA sent an email to Mr. Jon Esquibel, at the email address for Ms. Melissa Brown, with the preliminary findings from the facility inspection. Inspectors attached a copy of the Lagoon General Permit for the facility representatives.

Findings identified during the inspection are included in the Findings, Corrective Actions, and Recommendations section, below.

Findings, Corrective Actions, and Recommendations

Finding 1: Failure to conduct self-monitoring during discharge event. The lagoon system was discharging during the EPA inspection and the previous day (June 30, 2021), but self-monitoring samples were not collected.

EPA inspectors observed a discharge from Cell 3 through the outfall weir box (Outfall 001C) located on the southwest side of Cell 3 (Photos 82, 92-94). The facility representative was aware of the discharge because he checked the lagoons the day before the inspection and it was discharging (June 30, 2021). The facility representative indicated he did not understand or know the NPDES discharge and monitoring requirements. No effluent samples were collected at the time of the inspection or the day before, and there was no flow measuring device. Thus, no self-monitoring data was collected for the January – June 2021 monitoring period. The lagoon may have been discharging for approximately 6-8 months since a block from the outfall structure was removed in the "winter of 2020" (i.e., approximately November 2020 – June 2021).

Permit Requirements:

Part 3.2 of the permit states, "At a minimum, upon the effective date of this permit, the following constituents shall be monitored at the frequency and with the type of measurement indicated; samples or measurements shall be representative of the volume and nature of the monitored discharge. If no discharge occurs during the entire monitoring period, it shall be stated on the Discharge Monitoring Report (DMR) Form (EPA No. 3320-1) that no discharge or overflow occurred.

3.2.1. Self-monitoring frequency for DISCHARGE facilities will be based upon their discharge regimen and will be specified in the facility authorization letter. Facilities will be assigned to one of the three reporting sub-categories; A – Monthly, B – Quarterly, C – Semi-annual, based on their discharge status.

The July 21, 2016, facility authorization letter from the EPA indicated that the Saint Stephens Indian Mission WWTF was categorized as a Subcategory C Semi-Annual monitoring.

Effluent Characteristic	Frequency	Sample Type a/
Flow, MGD c/	b/	Instantaneous
5-day Biochemical Oxygen Demand (BOD5), mg/L	b/	Grab
pH, standard units	b/	Instantaneous
Total Suspended Solids (TSS)	b/	Grab
Total Residual Chlorine (TRC), mg/L	b/	Grab
Total Ammonia Nitrogen (as N) d/	b/	Grab
Escherichia coli, colonies/100 mL	b/	Grab
Total Nitrogen (N), mg/L	b/	Grab
Total Phosphorus (P), mg/L	b/	Grab
Oil and Grease, Visual	b/	Observation
Oil and Grease, mg/L e/	f/	Grab

a/ See Definitions, Part 8, for definition of terms in the permit.

b/ A minimum of three (3) samples or measurements shall be taken during any discharge of wastewater unless the discharge lasts only two days or less. It is required that a sample be taken at the beginning, middle, and end of the discharge if the discharge is less than one week in duration. If a single, continuous discharge is greater than one week in duration, three (3) samples shall be taken during the first week and one (1) during each following week. All of the samples collected during the

7 day or 30-day period are to be used in determining the averages. If only one (1) sample is collected during the period, it must be considered the same as the average for that period. The permittee always has the option of collecting additional samples if appropriate.

c/ Flow measurements of effluent volume shall be made in such a manner that the permittee can affirmatively demonstrate that representative values are being obtained. The average flow rate (in gallons per day) during the reporting period and the daily maximum flow (maximum volume discharged during a 24-hour period) shall be reported. Alternately, for facilities that do not have fixed flow measurement devices in place, flow may be estimated by performing calculations based on; the dimensions of the lagoon, discharge rate, length of discharge and depth markers.

d/ Ammonia monitoring is required for all discharges under the lagoon general permit. Ammonia monitoring data will be utilized to assess if water quality effects on streams require future limitations on ammonia to protect aquatic life. Receiving water temperature and pH must be taken concurrently with discharge.

e/ In the event that an oil sheen or floating oil is observed in the discharge, a grab sample shall be taken immediately and analyzed in accordance with the requirements of 40 C.F.R. Part 136. If no grab sample was taken during the reporting period because no visible sheen was observed, enter "No grab sample required this reporting period." or similar verbiage on the appropriate line of the DMR form."

Corrective Action:
Ensure that all required self-monitoring is conducted during discharge events and reported on the DMRs. Provide the EPA with a description of the corrective actions taken to address this finding.

Finding 2: Failure to accurately report DMR data. The DMR for the January – June 2021 monitoring period was submitted to EPA indicating that No Discharge occurred, which is inaccurate based on the field observations and interview with the facility representative.
Saint Stephens Indian Mission is authorized under NPDES permit WYG589103 as a Subcategory C – Semi-Annual Monitoring facility. According to the DMRs reported to the EPA, the facility has been reporting No Discharge (No Discharge Indicator Code or NODI code C) for every monitoring period since authorization began in July 2016, including the DMR submitted for January - June 2021. The DMRs are signed, certified, and submitted by Melissa Brown, Secretary for Saint Stephens.

As noted in Finding 1, EPA inspectors observed a discharge through Outfall 001C during the inspection. The facility representative was aware of the discharge because he checked the lagoons the day before the inspection and it was discharging (June 30, 2021). Based on the information provided during the inspection, the lagoon may have been discharging for approximately 6-8 months since a block was removed from the outfall structure in the "winter of 2020" (i.e., approximately November 2020 – June 2021). The DMR for the January – June 2021 monitoring period was submitted to EPA indicating that No Discharge occurred, which is inaccurate based on the field observations and interview of the facility representative.

Permit Requirements:
Part 5.4.2 of the Permit states, "Reporting of Effluent Monitoring Results for calendar quarter or semi-annual period DISCHARGE Facilities. Effluent monitoring results obtained during the previous calendar quarter or semi-annual period shall be summarized and reported on a Discharge Monitoring Report (DMR) Form (EPA No. 3320-1), postmarked no later than the 28th day of the month following the completed reporting period. If no discharge occurs during the reporting period, "no discharge" shall be reported, see example below. Legible copies of these, and all other reports required herein, shall be

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signed and certified in accordance with the Signatory Requirements (see Part 7.7), and submitted to the Planning and Targeting Program and the applicable Tribe at the addresses given in Part 5.4.4 below.

Example:

Reporting Period	DMR Due Date
Quarterly (e.g. April – June)	28th day following the end of the quarter (July 28th)
Semi-annually (e.g. July – December)	28th day following the end of the 6th month (January 28th)"

Part 7.7. of the Permit states, "Signatory Requirements. All applications, reports or information submitted to the Director shall be signed and certified."

Part 7.7.4. of the Permit states, "Certification. Any person signing a document under this section shall make the following certification:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." "

Part 7.8. of the Permit states, "Penalties for Falsification of Reports. The Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than six months per violation, or by both."

Corrective Action:

Ensure DMRs are accurate and complete. Submit a corrected DMR for the January – June 2021 monitoring period to reflect the discharge condition and that no self-monitoring samples were collected. Provide the EPA with a description of the corrective actions taken to address this finding.

Finding 3: Failure to properly operate and maintain the lagoon. The aerators in Cell 1 and Cell 2 were not operational. The valve boxes had abundant biomass, algae, and solids/sludge accumulation in them. The facility was discharging but had 3-4 feet of freeboard in Cell 1 and Cell 2.

During the inspection, the facility representative indicated that the aerators in Cell 1 and Cell 2 were not operating and had not been operating all year (June 2020 – June 2021). The facility representative stated he tried to start the aerators the day before the inspection (June 30, 2021), but was unsuccessful and they would require an electrician to fix. Cell 1 had two aerators and Cell 2 had one aerator (Photos 81, 83, and 86). Given that the aerators were not operating for about a year, the wastewater being discharged may not have been adequately treated.

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Additionally, the valve boxes that connected flow from Cell 1 to Cell 2, and Cell 2 to Cell 3 were observed to have abundant biomass, algae, and solids/sludge accumulation in them (Photos 84, 85, 87, and 88).

Inspectors walked around all three lagoon cells and observed about 3-4 feet of freeboard, or volume capacity, in Cell 1 and Cell 2 (Photo 81, 83, and 86). The facility was discharging when there appeared to be volume capacity within the lagoon system to hold more wastewater.

Permit Requirements:
Part 6.5 of the permit states, "Proper Operation and Maintenance: 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, at a minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.

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;
6.5.2. Take necessary action to promptly remove burrowing animals from the dikes;
6.5.3. Promptly repair damage to dikes caused by burrowing animals and/or erosion;
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)."

Corrective Action:
Ensure the lagoon system is properly operated and maintained. Provide the EPA with a description of the corrective actions taken to address this finding.

Finding 4: Failure to remove overgrown vegetation. Abundant vegetation was present on the dikes around Cell 3 and trees were present in Cell 3.
Inspectors observed abundant weeds, greater than 6 inches in height, on the dikes of Cell 3 (Photo 82 and 92) and trees growing in Cell 3 (81).

Permit Requirements:
Part 6.5 of the permit states, "Proper Operation and Maintenance: 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. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. However, the permittee shall operate, at a

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minimum, one complete set of each main line unit treatment process whether or not this process is needed to achieve permit effluent compliance.

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;
6.5.2. Take necessary action to promptly remove burrowing animals from the dikes;
6.5.3. Promptly repair damage to dikes caused by burrowing animals and/or erosion;
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)."

Corrective Action:
Remove rooted plants, including weeds, from the water on a regular basis and keep dikes mowed on a regular basis during the growing season (keep growth below 6" in height). Provide the EPA with photos and a description of the corrective actions taken to address this finding.

Finding 5: Failure to conduct weekly inspections. Saint Stephens representatives had not performed weekly lagoon self-inspections or maintained inspection logs.
Head of Maintenance, Jon Esquibel, indicated that facility representatives had not performed inspections of the wastewater treatment facility and did not maintain inspection records. Mr. Esquibel stated that lagoons were checked approximately 2-3 times per year.

Permit Requirements:
Part 3.3.1 of the 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:
3.3.1.1. Name of facility and permit number;
3.3.1.2. Date and time of the inspection;
3.3.1.3. Name of the inspector(s);
3.3.1.4. The facility's discharge status;
3.3.1.5. The flow rate of the discharge if occurring;
3.3.1.6. If a discharge is occurring, has occurred since the previous inspection, and/or if a discharge is likely to occur before the next inspection. (Note: If a discharge has occurred or is likely to occur before the next inspection, perform the appropriate monitoring and reporting requirements in Parts 3.2 and 5.4 of this permit if not already done.);
3.3.1.7. Is there is any leakage through the dikes;
3.3.1.8. Are there are any animal burrows in the dike;
3.3.1.9. Is there any erosion of the dikes;
3.3.1.10. Are there are any rooted plants, including weeds growing in the water;
3.3.1.11. Does the vegetation growth on the dikes needs mowing (e.g., greater than 6" tall);
3.3.1.12. List the date scheduled for operation and maintenance procedures to be undertaken at the wastewater treatment facility.
3.3.1.13. Identification of operational problems and/or maintenance problems;

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3.3.1.14. Recommendations, as appropriate, to remedy identified problems; 3.3.1.15. A brief description of any actions taken with regard to problems identified; and, 3.3.1.16. Other information, as appropriate. The permittee shall maintain the notebook in accordance with required record-keeping items listed above and shall make the log available for inspection, upon request, by authorized representatives of the U.S. Environmental Protection Agency or the applicable Tribe (see Part 5.10 of this permit)." **Corrective Action:** Inspect the wastewater treatment facility on at least a weekly basis, unless otherwise modified by written approval from the EPA, and maintain a notebook recording the inspection information. For reference, Appendix D in the permit has an Example Lagoon Inspection Form. Provide the EPA with a description of the corrective actions taken to address this finding and submit a copy of a recent inspection report.
Finding 6: Failure to maintain a copy of the permit onsite. A copy of the current permit was not available. In the Preliminary Findings email sent on July 9, 2021, to the Saint Stephens representative, EPA inspectors attached a copy of the current version of the permit. For reference, the current version of the permit is also available online (https://www.epa.gov/npdes-permits/about-region-8s-npdes-permit-program). **Permit Requirements:** Part 5.7 of the permit states, "Retention of Records: The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, inspection records, notifications to the EPA per this permit, and DMRs, for a period of at least five years from the date of the sample, measurement, report, application or submittal. Records of monitoring required by this permit related to sludge use and disposal activities must be kept at least five years (or longer as required by 40 C.F.R. Part 503). This period may be extended by request of the Director at any time. Data collected on site, data used to prepare the DMR, copies of DMRs, a copy of this NPDES permit, and the notice of intent for permit coverage, must be maintained on site." **Corrective Action:** Ensure a copy of the permit is maintained on site. This corrective action is complete. No response is requested pursuant to this corrective action.
Finding 7: There was no O&M manual maintained for the lagoon system. **EPA Guidance:** The EPA has developed guidance manuals on the proper operation and maintenance of lagoons. One of the guidance materials is called "Principles of Design and Operations of Wastewater Treatment Pond Systems for Plant Operators, Engineers, and Managers" (August 2011, EPA/600/R-11/088), available at https://www.epa.gov/sites/production/files/2014-09/documents/lagoon-pond-treatment-2011.pdf.

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Recommendation: The EPA recommends an O&M manual be developed for the facility. No response to the EPA is requested pursuant to this recommendation.