PHARMER ENGINEERING
1998 W. Judith Lane
Boise, Idaho 83705
Phone (208) 433-1900
Fax (208) 433-1901
www.pharmereng.com

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U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

February 14, 2012

U.S. Environmental Protection Agency
NPDES Compliance Unit (OCE-133)
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101
Attn: David Domingo

Idaho Department of Environmental Quality
Boise Regional Office
1445 N. Orchard Street
Boise, Idaho 83706
Attn: Todd Crutcher

Re: Wilderness Ranch Water Treatment Plant NPDES Permit Number ID-002831-2

Dear Mr. Domingo and Mr. Crutcher:

This letter is in response to the notice of violation which was received by the Wilderness Ranch Water Treatment Plant (Plant) on January 18th, 2012. The letter provided notification of violations of the Clean Water Act and NPDES permit which Environmental Protection Agency (EPA) discovered after reviewing administrative files and additional violations which were discovered during an inspection of the Plant conducted by the Idaho Department of Environmental Quality (IDEQ) on July 22nd, 2011.

Violations

The Clean Water Act and permit violations which were identified during the administrative review and inspection are summarized below:

1. The permit requires the Plant to complete daily monitoring reports (DMR) which summarize the discharge sample testing and must be submitted monthly to EPA and IDEQ by the 15th of the following month. During the five years of plant operation under the current permit no DMRs were submitted.

2. Wilderness Ranch is authorized to discharge from Outfall 001 only those pollutants resulting from facility processes, waste streams, and operations that have been identified within the permit application. During the July 2011 inspection, the IDEQ inspector noted that a pipe near Outfall 001 was discharging.

3. During the inspection, the Plant did not have a quality assurance plan (QAP). As part of the NPDES permit, a QAP must be developed for the facility and a written notice to EPA and IDEQ indicating that the plan has been developed and is available at the Plant as required.

4. The permit requires the Plant to develop and implement a best management practices (BMP) plan which meets the specific requirements listed within the permit. At the time of the inspection a BMP plan was not available.

5. During the inspection, the inspector noted that a copy of the permit was not available at the Plant.

Request for Information

The EPA submitted a Request for Information document to the Plant to address the Clean Water Act and permit violations. The Request for Information document was received on January 18th, 2012. The Request for Information document required the Plant to submit the following information within 30 days of receiving the notice:

1. The Plant must submit to EPA a schematic or engineering drawing as well as a narrative description that clearly identifies the discharge pipe near Outfall 001. In addition, the Plant must submit a notice of noncompliance report in accordance with Part III.H of the Permit concerning the unpermitted discharge. The report must include the estimated time that noncompliance is expected to continue if that has not been corrected and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the plant intends to continue to discharge from the unpermitted pipe, the plant must submit a permit application for the pipe with the aforementioned documents specified in this paragraph.

2. The Plant must submit to EPA a written notification stating that the Quality Assurance Plan (QAP) has been developed and implemented as required by Part II.A of the permit.

3. The Plant must submit to EPA a written notice stating that the Best Management Practices (BMP) Plan has been developed and implemented as required by Part II.B of the Permit.

4. The Plant must submit to EPA the previous five years of monthly discharge monitoring reports starting in November 2006 as required by Part III.B of the Permit.

The Wilderness Ranch Owners' Association is working diligently to address the permit violations and provide the required documents within the Request for Information. The actions completed to date to address these issues are provided below.

Request for Information Response

1. Attached to this letter is a schematic highlighting the outfall plan layout. The Plant has three pipe outfalls near Outfall 001. These include the clear well overflow outfall, the facility building outfall, and the primary force main outfall. Outfall 001 is the drying bed drain outfall and is only used if the solids drying beds overflow.

   The Plant operates multiple chlorine analyzers to measure chlorine concentrations in the finished water as well as for process evaluations. The analyzers are operated continuously during plant operation and discharge to the Plant process drain system which leads to the facility building outfall. This was the pipe near Outfall 001 which was discharging during the

IDEQ inspection. It is estimated that while the plant was producing potable water over the past five years of permitted operation, this outfall was discharging to Mores Creek.

At this time the Plant has removed all chlorine analyzer drain lines and removed them from the process drain outfall pipe and now drains them into the plant surge tank. The surge tank is used to take process water overflow streams and recycle them internally within the system. This action eliminates any further unpermitted discharges from the chlorine analyzers.

Although the Plant was designed with four (4) outfalls, it is currently permitted to discharge from only one which is used for the drying beds overflow. In addition to having multiple outfalls, the Plant does not have a location where operators can take required grab samples since access to Outfall 001 is difficult. To address both of these issues the Plant is taking steps to prevent further unpermitted discharges and to provide an accessible sampling location for future discharges.

The Plant has plans to construct a new sampling sump which will provide a location for each of the plant outfalls to drain before discharging to Mores Creek through Outfall 001. At this location, the Plant will be able to take the needed grab samples and test for all required constituents to meet permit requirements and prevent further violations. It is estimated that this project will be completed by the end of 2012.

2. The Plant has completed a QAP and implemented the plan. A copy of the QAP is available at the treatment plant for EPA or its authorized representatives upon request.

3. The Plant has completed a BMP plan and implemented the plan. A copy of the BMP plan is available at the treatment plant for EPA or its authorized representatives upon request.

4. The Request for Information document requires the Plant to provide the previous five years of monthly discharge monitoring reports starting with November 2006. This information is not available. No DMRs were completed over the past five years of operation due to the small and inconsistent nature of the discharges and the lack of an easily accessible location to take samples. When discharges did not take place the DMRs were not submitted.

   To address these issues, the Plant is taking the following steps:

   a. Plant operators are now completing DMRs for each month regardless of discharges occurring. When a discharge does not occur the DMR will be properly completed identifying this fact and submitted.

   b. The Plant will also construct a new sampling sump which will be used to provide easy access for grab samples and flow monitoring before discharging to Outfall 001.

   c. The Plant has also implemented the QAP and BMP plans and is maintaining a copy of the permit at the Plant which is available for EPA or its authorized representative upon request.

Conclusion

The Wilderness Ranch Owners' Association is determined to make the necessary changes to comply with the NPDES permit. The actions described above detail the changes which have already been completed and the planned actions to bring the Plant into full compliance.

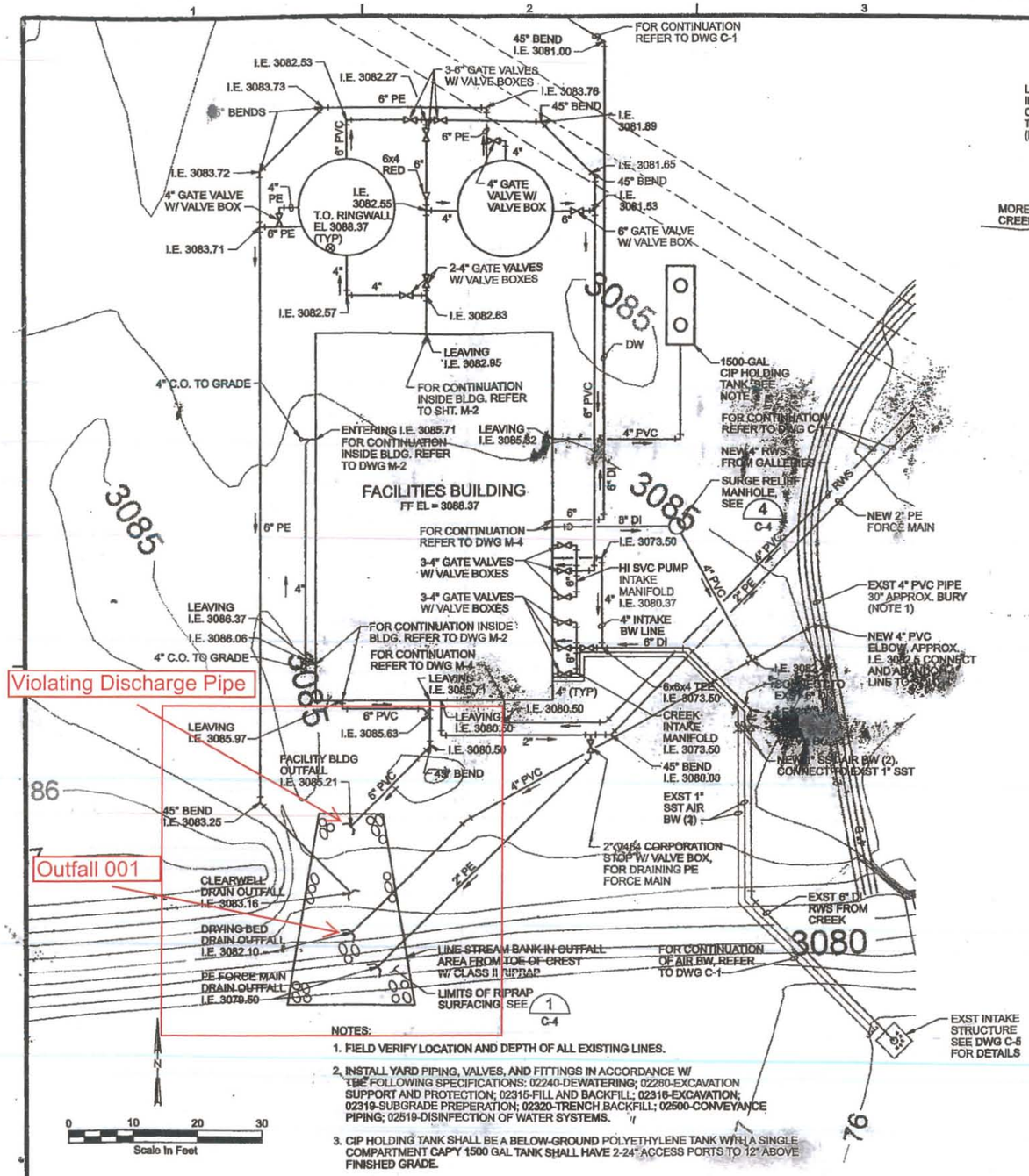
If you require any additional information, have questions about the actions which have been completed or this response to the information request; feel free to contact me at (208) 433-1900 or jreed@pharmereng.com.

Sincerely,

Josh Reed

Josh Reed, P.E.
Pharmer Engineering, LLC

Attachments: Discharge pipe schematic near Outfall 001

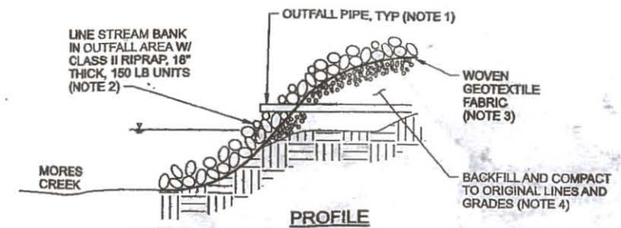


NOTES:

1. FIELD VERIFY LOCATION AND DEPTH OF ALL EXISTING LINES.
2. INSTALL YARD PIPING, VALVES, AND FITTINGS IN ACCORDANCE W/ THE FOLLOWING SPECIFICATIONS: 02240-DEWATERING; 02260-EXCAVATION SUPPORT AND PROTECTION; 02315-FILL AND BACKFILL; 02316-EXCAVATION; 02319-SUBGRADE PREPERATION; 02320-TRENCH BACKFILL; 02500-CONVEYANCE PIPING; 02519-DISINFECTION OF WATER SYSTEMS.
3. CIP HOLDING TANK SHALL BE A BELOW-GROUND POLYETHYLENE TANK WITH A SINGLE COMPARTMENT CAPY 1500 GAL TANK SHALL HAVE 2-24" ACCESS PORTS TO 12" ABOVE FINISHED GRADE.

ENLARGED YARD PIPING AND OUTFALL PLAN

1"=10'



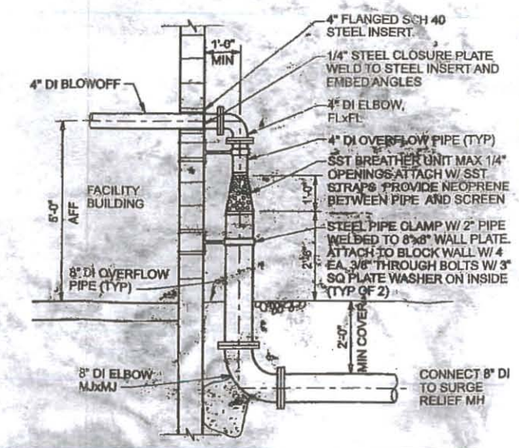
PROFILE

NOTES:

1. INSTALL RODENT SCREEN OVER OPENING OF OUTFALL PIPE SCREEN SHALL BE 1/4" MESH BRONZE W/ 2 SST HOSE CLAMPS. PIPE END SHALL BE FLUSH WITH FINISH GRADE OF RIPRAP SURFACING MATERIAL.
2. RIPRAP SURFACING SHALL BE AS SPECIFIED IN SECTION 02374-RIPRAP AND RIPRAP BEDDING.
3. WOVEN GEOTEXTILE SHALL BE PLACED BENEATH RIPRAP IN ACCORDANCE W/ SPEC SECTION 02371-GEOTEXTILES.
4. BEDDING MATERIAL FOR OUTFALL PIPE SHALL BE IN ACCORDANCE W/ SPEC SECTION 02320-TRENCH BACKFILL.

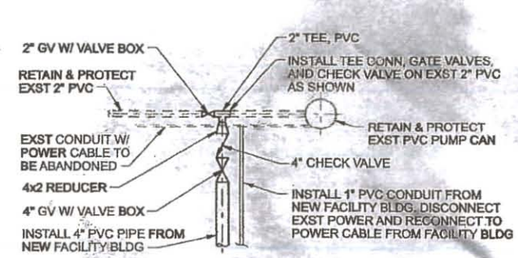
OUTFALL DETAIL 1 C-4

NTS

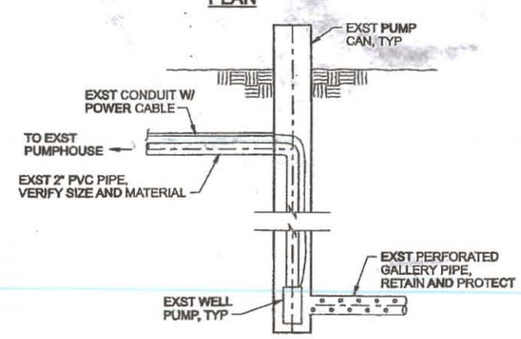


SURGE ANTICIPATOR BLOWOFF DETAIL 2 C-4

1"=2'



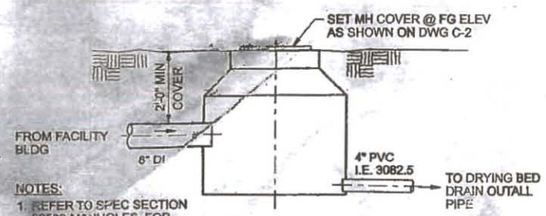
PLAN



ELEVATION

GALLERY PUMP CONNECTION 3 C-1

NTS



NOTES:

1. REFER TO SPEC SECTION 02533-MANHOLES, FOR ADD'L DETAILS

SURGE RELIEF MANHOLE 4 C-4

1"=2'

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DSGN	P. JOHNSON					
DR	B. CLEGG					
CHK	M. LAVEY					
APVD	P. JOHNSON	NO.	DATE	REVISION	BY	APVD

VERIFY SCALE: BAR IS ONE INCH ON ORIGINAL DRAWING. 0 1". IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

CH2MHILL

WILDERNESS RANCH WTP
WILDERNESS RANCH OWNERS ASSOCIATION
BOISE, IDAHO

SITE DEVELOPMENT
OUTFALL PLAN AND DETAILS

SHEET	13
DWG	C-4
DATE	MAY 2004
PROJ	170993.P7

FILENAME: 470993c4.dgn PLOT DATE: 27-MAY-2004 PLOT TIME: 15:08:20