NPDES
INSPECTION REPORT

CITY OF SODA SPRINGS, ID
WASTEWATER TREATMENT FACILITY

March 13, 2012

Prepared by:
David Domingo
NPDES Compliance Unit
Office of Compliance and Enforcement
Environmental Protection Agency, Region 10

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(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Alan Skinner, Director of City Services for the City of Soda Springs, ID and Mr. Kelly Hill, Wastewater Treatment Plant Supervisor)

I. Facility Information

Facility Name:	City of Soda Springs, ID Wastewater Treatment Plant (Facility)
Facility Type:	Sewage Treatment Plant
Facility Location:	500 Big Springs Road Soda Springs, ID 83276 Latitude: +42.6461 Longitude: -111.6094
Mailing Address:	9 West 2nd South Soda Springs, ID 83276
Facility Contacts:	Alan Skinner, Director of City Services
Facility Numbers:	Ph: (208) 547-2600 (City Hall) Fax: (208) 547-2601
Permit Number:	ID-002081-8
Permit Status:	The current permit became effective December 21, 2001 and expired on December 21, 2006. The City reapplied in July 2006 and the permit is administratively extended.
SIC Code:	4952

II. Inspection Information

Inspection Date/Time:	March 13, 2012	9:00 AM to 5:30 PM
Inspectors:	David Domingo (EPA) and Craig Borrenpohl (IDEQ, Pocatello)	
Weather:	Sunny	
Purpose:	Determination of compliance with the NPDES Permit and the Clean Water Act	

III. Inspection Entry

This was an announced inspection. Mr. Skinner was contacted the week prior to the March 13th inspection date and emailed a copy of the status report developed by EPA (see Attachment D).

I met Mr. Hill and Mr. Skinner at the Facility at approximately 9:00 AM. The City's engineering consultant, Mr. David Noel, Forsgren Associates, joined us at approximately 9:30 AM.

I presented my credentials and discussed the purpose of the visit with Mr. Hill and Mr. Skinner prior to the inspection. I was not denied access to the Facility.

I was accompanied throughout the inspection by Mr. Hill and Mr. Skinner.

IV. Inspection Chronology

On March 13, 2012, the inspection began with an entry interview, followed by a file review and tour of the Facility which is located on the south side of the City at 500 Big Springs Road (see Attachment A). The Facility tour included an inspection of the treatment units and a review of the sample collection and analytical procedures at the onsite laboratory. As part of the file review, the Facility's quality assurance plan (QAP), the operation and maintenance (O&M) manual and discharge monitoring reports (DMRs) were reviewed. Mr. Hill is the lead, certified operator responsible for sample collection and onsite analysis. Mr. Hill is also responsible for filling out the DMRs and Mr. Skinner is responsible for signing the DMRs.

The inspection then concluded with an exit interview where I pointed out the areas of concern I observed during the inspection.

V. Owner and Operator Information

The Facility is currently owned and operated by the City of Soda Springs, Idaho.

VI. Background

The permit authorizes the Facility to discharge through outfall 001 to the Bear River. Based on the July 2006 permit reapplication submitted by the City, the Facility receives wastewater primarily from local residents and commercial establishments. The current service population is approximately 3,058 and the Facility has a design flow of 1.7 million gallons per day (MGD) and an actual annual average daily flow of 1.08 MGD.

The collection system is 100% separated sanitary sewer.

VII. Waste Management Process

The Facility is a mechanical treatment plant that is undergoing several phases of improvements. The upgrades include construction of a new headworks building that contains fine screen units which started up in March 2012. This unit is replacing the existing comminutor and primary clarifier. Wastewater currently flows from the headworks, the comminutor and primary clarifier before going to the aeration basins. Wastewater flows into the clarifier basins and then into the chlorine contact basins prior to discharging to the Bear River. According to Mr. Skinner, upcoming Facility improvements include replacing chlorine with UV disinfection and upgrading the secondary treatment units.

At the time of inspection, all treatment units were operational. See Attachment B for photo documentation of the units.

VIII. Facility Sample Collection and Analyses

The sample collection and onsite analyses are conducted by several individuals including Mr. Hill.

The parameters analyzed onsite using monitoring equipment include flow (influent), pH, total residual chlorine (TRC), temperature and dissolved oxygen.

Biochemical oxygen demand (BOD), total suspended solids (TSS), total ammonia and *Escherichia coli* (E. coli) analyses for samples collected from the Facility are analyzed by an outside laboratory (i.e. IAS Enviro-Chem, 3314 Poleline Road, Pocatello, ID 83201 Ph: (208) 237-3300.

See Attachment B for photo documentation of the City's QAP.

IX. Areas of Concern

This inspection included a review of the treatment system, the sample collection and analyses procedures, and documentation required by the Permit. During the course of this inspection, I observed and identified the following areas of concern:

A. Part I.A (Table 1) of the Permit specifies that the permittee must collect 24-hour composite samples for BOD, TSS, total ammonia, nitrate-nitrite, total phosphorus, arsenic, cadmium, copper, lead, nickel, zinc and whole effluent toxicity. Part V of the Permit specifies that a "24-hour composite" sample shall mean a flow proportioned mixture of at least three discrete samples collected over a 24 hour period. At the time of the inspection, the City was collecting time proportioned samples (i.e. ~ 225 ml every hour). My concern is the City was not collecting flow proportioned 24-hour composite samples as specified in Part I.A of the Permit.

B. Quality Assurance Plan (QAP) Part I.E of the Permit specifies that the permittee develop and implement a QAP for all monitoring required by the Permit. At a minimum, the QAP must include the following:

a. Details on the number of samples, type of sample containers, preservation of samples, holding times, analytical methods, analytical detection and quantitation limits for each target compound, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements.
b. Map(s) indicating the location of each sampling point.
c. Qualification and training of personnel.
d. Name(s), address(es), and telephone number(s) of laboratories used by the permittee.

In addition, the permittee must use the EPA approved quality assurance/quality control (QA/QC) and chain-of-custody procedures described in *EPA's Requirements for Quality Assurance Project Plans, EPA-QA/R-5* and *Guidance for Quality Assurance Project Plans, EPA QA/G-5*. At the time of the inspection, the QAP did not specify EPA approved analytical methods, holding times and sample preservation temperatures. My concern is the QAP did not include all the information specified in Part I.E of the Permit.

C. Infiltration/Inflow Study Part I.G of the Permit specifies the City must submit results of the Infiltration/Inflow (I/I) study with the next permit application due 180 days prior to the expiration date of the Permit. According to Mr. Skinner, Keller and Associates submitted the 2006 application on behalf of the City and Mr. Hill and Mr. Skinner were unsure if the applicable information was submitted with the 2006 permit application. They believe the analysis was likely done but may be addressed as part of the collection system study which was included within the facilities plan. Upon return to EPA's Region 10 office, the 2006 permit application was reviewed and no I/I study was included with the application. My concern is that the City did not submit the I/I study with the 2006 permit application as required in Part I.G of the Permit.

D. Reporting of Monitoring Results Parts II.B and IV.E of the Permit specify that the permittee must summarize monitoring results each month on the DMR and sign and certify that the DMRs are true, accurate and complete. At the time of the inspection, the February 2012 DMR was reviewed along with the corresponding analytical data (i.e., operator's daily log book, certificate of analysis…). The following deficiencies were noted:

a. Monthly average loadings for BOD, TSS, TRC, NH_3… were calculated using the average monthly flow instead of the corresponding flow on the days sampling occurred.
b. TRC weekly average calculations for the first and last weeks of the month did not include all monitoring results within the calendar week. The calculations for these two weeks incorporated monitoring results within the calendar

month (i.e. weekly average for the first week was based on concentration and loadings results for February 1-3; weekly average for the last week was based on concentration and loadings results for February 27-29).

c. The monthly geometric mean for E. coli was reported as 19 / 100 ml, however the correct result is 17 / 100 ml.

My concern is that the City failed to submit true, accurate and complete DMRs as required in Parts II.B and IV.E of the Permit.

E. Monitoring Procedures Part II.C of the Permit specifies that monitoring must be conducted according to test procedures approved under federal regulations at 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 503. At the time of the inspection, the City's chain-of-custody forms indicated that the temperature of samples received by the contract laboratory on February 7 and February 28, 2012 were -1.6°C and 14°C, respectively. These temperatures are not consistent with EPA approved methods which specify sample preservation temperature of $\leq$ 6°C but not frozen for BOD, TSS, NH_3... and $\leq$ 10°C but not frozen for E. coli analysis. My concern is that the City did follow EPA approved methods in accordance with Part II.C of the Permit. Furthermore, failure to follow EPA approved methods may yield sample results that may not be representative of the volume and nature of the monitored discharge as required in Part II.A of the Permit.

F. Twenty-four Hour Notice of Noncompliance Reporting Part II.G of the Permit specifies that the permittee must report within 24 hours from the time the permittee becomes aware of specific occurrences including any violation of a maximum daily discharge limit for pollutants in Table 1. In addition, the permittee must submit written notice within five days which contains:

a. any noncompliance that may endanger health or the environment;
b. any unanticipated bypass that exceeds any effluent limitation in the permit;
c. any upset that exceeds any effluent limitation in the permit;
d. any violation of a maximum daily discharge limitation for any of the pollutants in Table 1 of Part I.A.; or
e. any overflow prior to the treatment works, whether or not such overflow endangers health or the environment or exceeds any effluent limitation.

According to Mr. Skinner, the City had failed to provide any notification in accordance with Part II.G of the Permit in regards to the daily maximum result of 4.92 mg/l for total ammonia on February 21, 2012. Upon return to EPA's Region 10 office, the NPDES 24-hour hotline database (see Attachment C) was reviewed and no 24-hour notice was recorded. My concern is the City did not provide the proper notification as specified in Part II.G of the Permit.

G. Signatory Requirements Part IV.E of the Permit specifies that all reports required by the Permit and other information requested by the Director shall be signed by the ranking elected official (i.e. mayor) or by a duly authorized representative of that person. At the time of the inspection, Mr. Skinner was signing the monthly DMRs.

The City and EPA have no written authorization stating Mr. Skinner as a duly authorized representative. My concern is the permittee has not provided written authorization as specified in Part IV.E of the Permit.

X. Additional Observations

A. Method Detection Limits Part I.A.1 of the Permit specifies that the permittee must use methods that can achieve a method detection limit (MDL) less than the effluent limitation. For parameters that do not have effluent limitations, the permittee must use methods that can achieve MDLs less than or equal to those specified in Table 2. At the time of the inspection, the QAP did not specify the MDLs for the analytical methods used by the City and their contract lab. My concern is without current MDLs specified in the QAP, the City cannot ensure that the analytical methods used onsite and by the contract lab can achieve the specified MDLs. Furthermore, the City can readily determine if the detection levels identified on the certificate of analyses from contract lab are in compliance with Part I.A.1 of the Permit.

B. Reporting of Monitoring Results Parts II.B and IV.E of the Permit specify that the permittee must summarize monitoring results each month on the DMR and sign and certify that the DMRs are true, accurate and complete. The following additional observations were noted:

   a. The City reported an instantaneous maximum of 2,419 for E. coli. The certificate of analysis specified "> 2,419". My concerns are that the City failed to report the actual analytical result and by failing to provide an upper range, the reported result may not be accurate nor representative of the actual discharge in accordance with Part II.A of the Permit.
   b. The City reports the daily maximum loading for TRC based upon the corresponding highest daily maximum concentration result during the month. My concern is that pollutant loadings are based on concentration and corresponding flow, therefore the highest daily maximum loading may not necessarily occur on the same day as the highest daily maximum concentration. Consequently, the City may not accurately report the actual highest daily maximum loading during the month.
   c. The City reports "N/A" on the DMRs for metal results but does not clearly explain what the term means (e.g. not analyzed, not applicable…). This observation is further complicated in that the preprinted DMRs specify semiannual for the applicable metals as specified in Part I.A (Table 1) of the Permit. However, Footnote 8 of Table 1 also specifies that the City must sample for the applicable metals within 24 hours of a waste hauler disposing at the Facility and sample collections must be at least 3 months apart. According to Mr. Hill, discharges from waste haulers are not on a prescribed schedule and there may be times in which a discharge may not occur within the semiannual timeframe. My concern is that the City does not clearly define the term "N/A" and provide an adequate written explanation as required in Part II.H of the Permit of the circumstances in which the City is unable to comply with the semiannual sample frequency for metals.

d. Part. I.A of the Permit specifies the City must monitor effluent continuously. The City monitors and reports only influent flow and reports "N/A" on the DMRs for effluent flow. My concern is that the City does not monitor effluent flow as specified in Part I.A of the Permit.
e. Part I.A of the Permit specifies weekly averages for BOD and TSS. The City has not clearly defined a calendar week (e.g. Monday to Sunday; Saturday to Friday, etc.) in applicable documents including the QAP. This observation is further complicated in light of the aforementioned deficiency regarding the TRC weekly average calculations for the first and last weeks of the month. My concern is the City has not clearly defined a calendar week which will assist in calculating weekly averages for those applicable parameters.

C. Monitoring of Hauled Waste Part I.H of the Permit specifies that the City must collect manifests from each load of hauled waste discharged to the Facility. At a minimum, the manifest must include:
   a. The name and address of each customer;
   b. A statement that the hauled waste being discharged to the Facility is only domestic in nature; and
   c. The signature of the waste hauler.

   My concern is that the January 23 and 24, 2012 manifests may not include a statement that the hauled waste is only domestic in nature.

D. Compliance Order and Request for Information The May 2011 Request for Information and Compliance Order (Docket Number: CWA-10-2011-0088) specified the following:
   a. By December 31, 2011, the City shall finish constructing the new headworks for the Facility.
   b. By May 31, 2012, City shall install new ultraviolet ("UV") disinfection equipment at a temporary location at the Facility and will install a temporary raw sewage bypass pipe from the new primary lift station to the existing aeration basins.
   c. By November 30, 2012, Respondent shall complete construction of the new secondary treatment process.
   d. By April 30, 2013, Respondent shall complete construction of the tertiary filtration building.
   e. By April 30, 2013, Respondent shall complete the following upgrades to the existing facilities:
      1. Installation of an emergency power generator;
      2. Upgrades to the control building;
      3. Upgrades in the existing chlorination building;
      4. Pump replacement in the thickener building and
      5. Upgrades to the primary digester.

   f. By December 31, 2013, Respondent shall achieve full compliance with the effluent limitations set forth in the Permit.

According to Mr. Skinner, flow started through the new headworks on December 21, 2011. In addition, plans have been submitted to the Pocatello office of IDEQ on February 21, 2012 for the proposed UV disinfection system and new secondary and tertiary treatment processes. The new secondary treatment process will address NH_3 in the effluent and compliance with current permit limits. The tertiary process will address total phosphorus in the effluent.

E. Additional Inconsistencies in ICIS / Status Report Part I.C.4 of the Permit specifies the permittee must submit results of the quarterly toxicity tests with the monthly DMRs for the third month in the quarter (i.e. March, June, September and December). In addition, Part I.D of the Permit specifies the surface water monitoring results must be submitted with the next permit application due 180 days prior to the expiration date of the Permit. At the time of the inspection, the City provided the WET results and corresponding DMRs and benchsheets with applicable surface water monitoring results (see Attachment B for photo documentation). The status report provided to the City prior to the inspection (see Attachment D) specifies that the there is no record in EPA's national database, Integrated Compliance Information System or ICIS regarding the submittal of surface water monitoring and indicates only one of the WET results was received (i.e. due July 10, 2005 and received July 11, 2005). According to Mr. Skinner, Keller and Associates submitted the 2006 application on behalf of the City and Mr. Hill and Mr. Skinner were unsure if the applicable information was submitted with the 2006 permit application as specified in Part I.D of the Permit. Upon return to EPA's Region 10 office, the 2006 permit application was reviewed and both WET and surface water monitoring results were included as part of the application. My concern is that the City did not have a copy of the 2006 permit application and could not verify if all applicable information required in Part I.D of the Permit were submitted with the application. Furthermore, EPA's database does not indicate that the surface monitoring results were submitted with the 2006 application and the three additional WET results were submitted on the corresponding monthly DMRs.

XI. Inspection Sampling

Samples were not collected by EPA at the time of this inspection.

Report Completion Date: 4/12/12

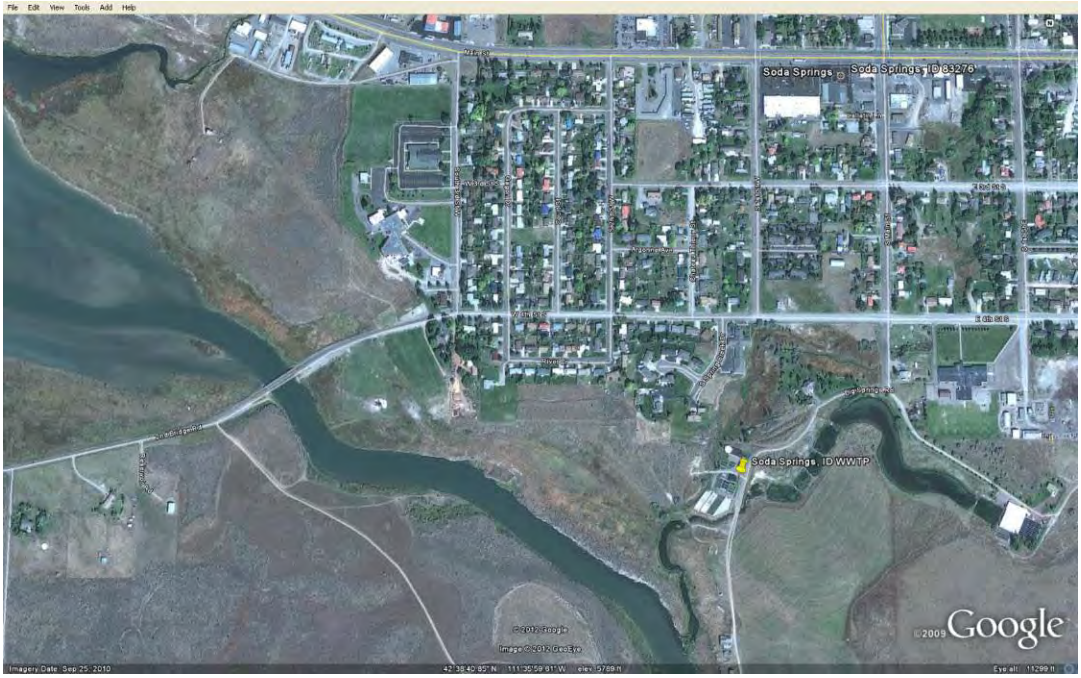
Lead Inspector Signature: David A Dominguez

ATTACHMENT A

Aerial Photographs

City of Soda Springs, Idaho
Wastewater Treatment Facility

(March 13, 2012 Inspection)



Aerial photograph of the City of Soda Springs, ID wastewater treatment plant. Facility is located on the south side of the City at 500 Big Springs Road and discharges effluent to the Bear River.

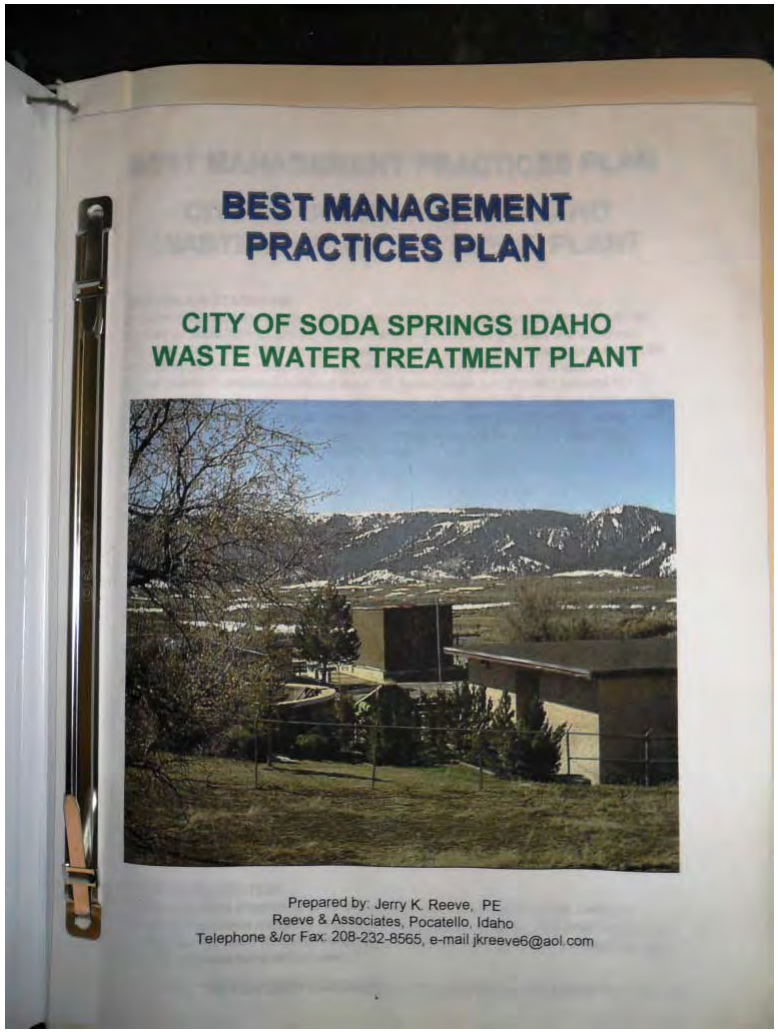
Aerial photograph of the City of Soda Springs, ID wastewater treatment plant. Facility is located on the south side of the City at 500 Big Springs Road and discharges effluent to the Bear River.

ATTACHMENT B

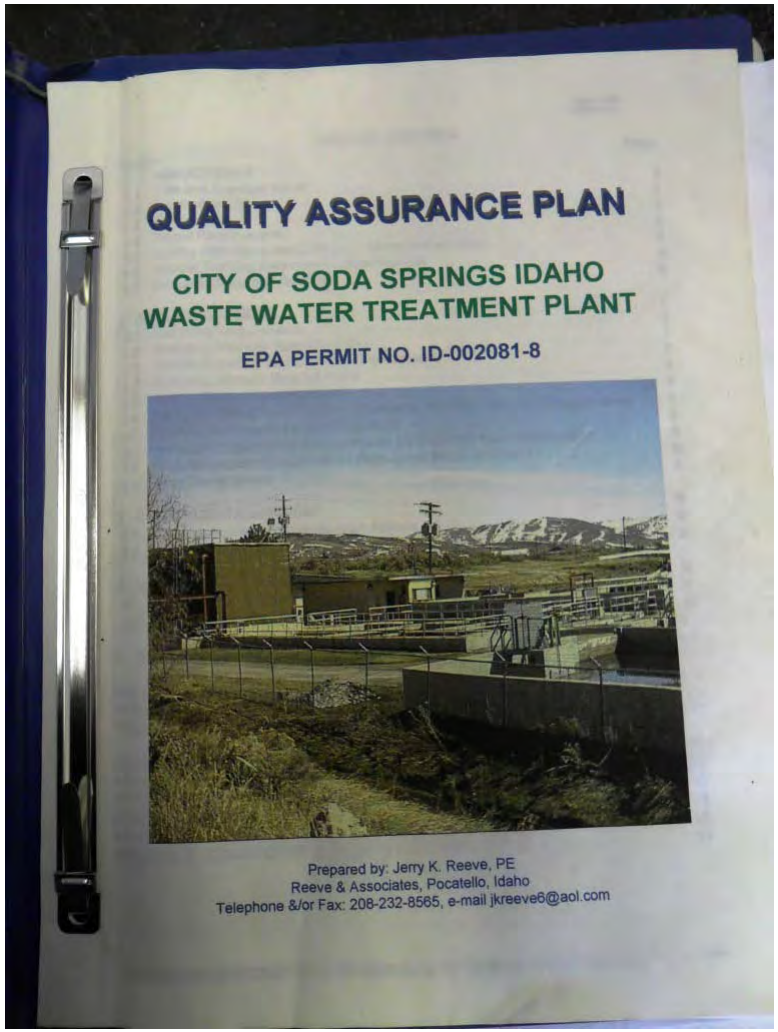
Photograph Documentation

City of Soda Springs, Idaho
Wastewater Treatment Facility

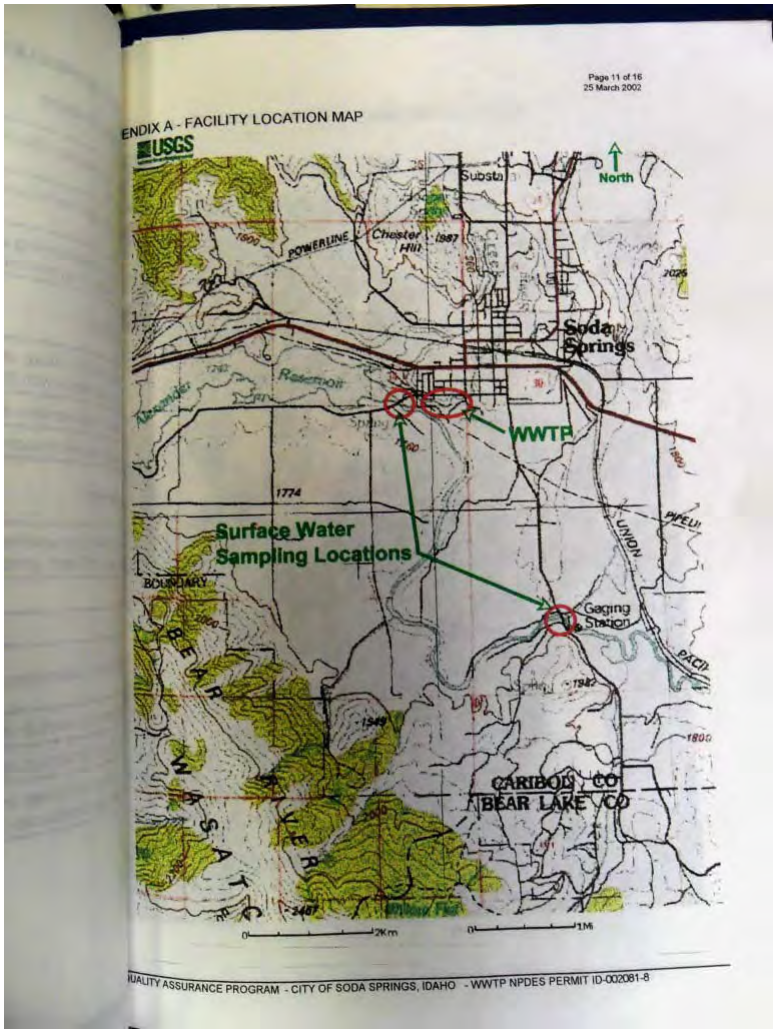
(March 13, 2012 Inspection)



Photograph by David Domingo (EPA) on March 13, 2012 looking at Best Management Practices Plan for the Facility.

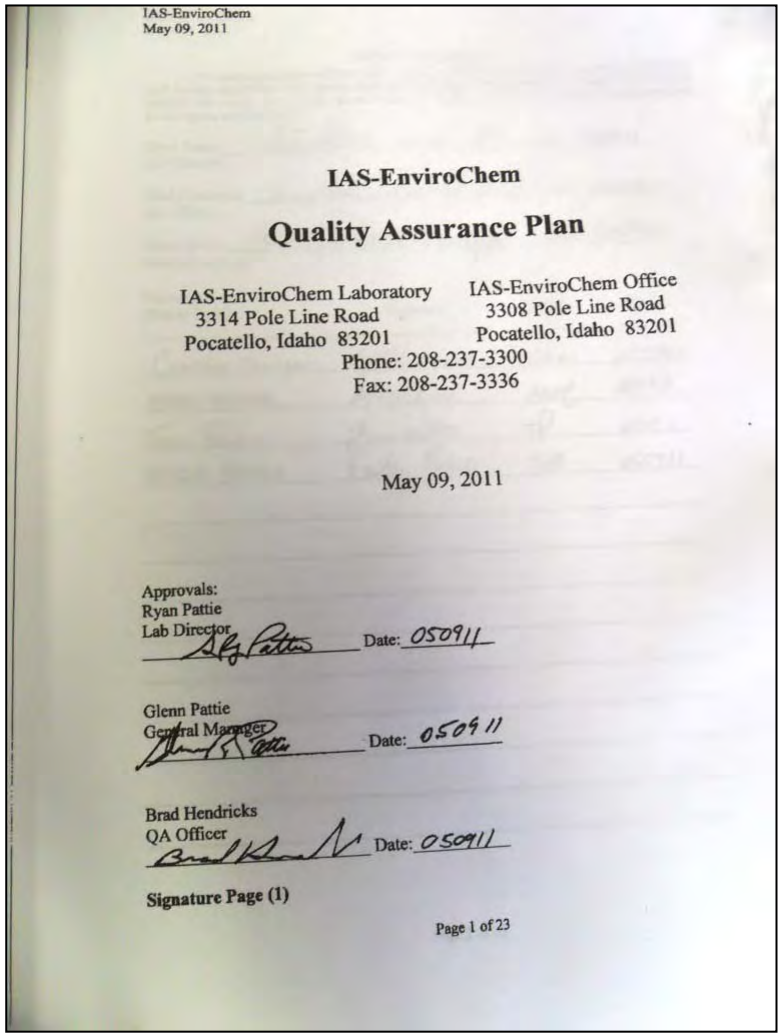


Photograph by David Domingo (EPA) on March 13, 2012 looking at the Quality Assurance Plan (QAP) for the Facility.



Photograph by David Domingo (EPA) on March 13, 2012 looking at the map in the QAP which identifies the surface water monitoring locations.

Photograph by David Domingo (EPA) on March 13, 2012 looking at map in the QAP which identifies the influent and effluent monitoring locations.



IAS-EnviroChem
May 09, 2011

IAS-EnviroChem

Quality Assurance Plan

IAS-EnviroChem Laboratory
3314 Pole Line Road
Pocatello, Idaho 83201

IAS-EnviroChem Office
3308 Pole Line Road
Pocatello, Idaho 83201

Phone: 208-237-3300
Fax: 208-237-3336

May 09, 2011

Approvals:
Ryan Pattie
Lab Director
Date: 050911

Glenn Pattie
General Manager
Date: 050911

Brad Hendricks
QA Officer
Date: 050911

Signature Page (1)

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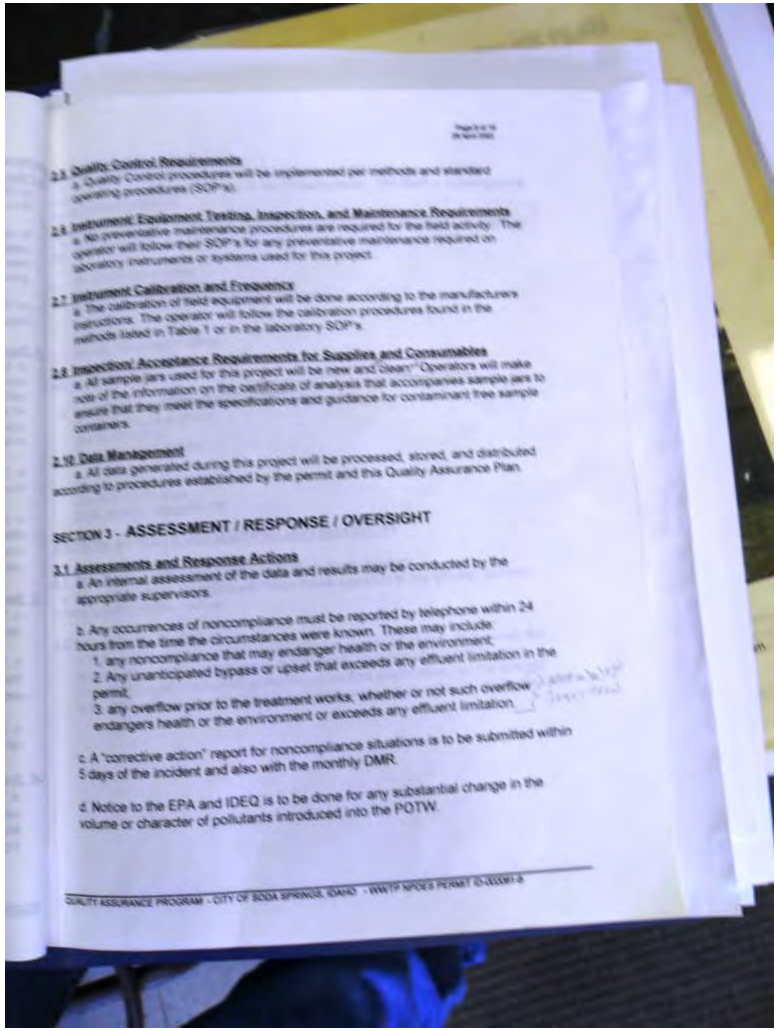
Photograph by David Domingo (EPA) on March 13, 2012 looking at the the QAP for the City's contract lab, IES-EnviroChem.



2.5. Quality Control Requirements
a. Quality Control procedures will be implemented per methods and standard operating procedures (SOP's).

2.6. Instrument Equipment Testing, Inspection, and Maintenance Requirements
a. No preventative maintenance procedures are required for the field activity. The operator will follow their SOP's for any preventative maintenance required on laboratory instruments or systems used for this project.

2.7. Instrument Calibration and Frequency
a. The calibration of field equipment will be done according to the manufacturers instructions. The operator will follow the calibration procedures found in the methods listed in Table 1 or in the laboratory SOP's.

2.8. Inspection/ Acceptance Requirements for Supplies and Consumables
a. All sample jars used for this project will be new and clean. Operators will make note of the information on the certificate of analysis that accompanies sample jars to ensure that they meet the specifications and guidance for contaminant free sample containers.

2.10. Data Management
a. All data generated during this project will be processed, stored, and distributed according to procedures established by the permit and this Quality Assurance Plan.

SECTION 3 - ASSESSMENT / RESPONSE / OVERSIGHT

3.1. Assessments and Response Actions
a. An internal assessment of the data and results may be conducted by the appropriate supervisors.

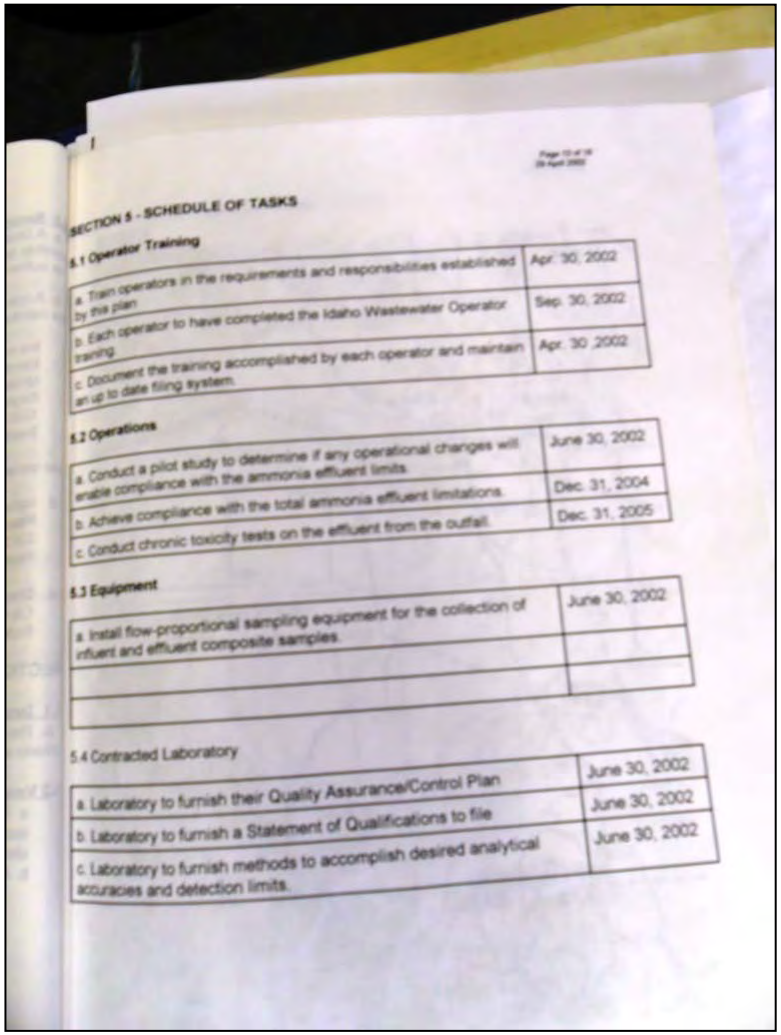
b. Any occurrences of noncompliance must be reported by telephone within 24 hours from the time the circumstances were known. These may include:
1. any noncompliance that may endanger health or the environment;
2. Any unanticipated bypass or upset that exceeds any effluent limitation in the permit;
3. any overflow prior to the treatment works, whether or not such overflow endangers health or the environment or exceeds any effluent limitation.

c. A "corrective action" report for noncompliance situations is to be submitted within 5 days of the incident and also with the monthly DMR.

d. Notice to the EPA and IDEQ is to be done for any substantial change in the volume or character of pollutants introduced into the POTW.

QUALITY ASSURANCE PROGRAM - CITY OF SODA SPRINGS, IDAHO - WWTP NPDES PERMIT ID-

Photograph by David Domingo (EPA) on March 13, 2012 looking at the City's QAP which describes steps for onsite analysis including calibration of field equipment according to manufacturer's instructions.



SECTION 5 - SCHEDULE OF TASKS

5.1 Operator Training

a. Train operators in the requirements and responsibilities established by this plan	Apr. 30, 2002
b. Each operator to have completed the Idaho Wastewater Operator training	Sep. 30, 2002
c. Document the training accomplished by each operator and maintain an up to date filing system.	Apr. 30 ,2002

5.2 Operations

a. Conduct a pilot study to determine if any operational changes will enable compliance with the ammonia effluent limits	June 30, 2002
b. Achieve compliance with the total ammonia effluent limitations.	Dec. 31, 2004
c. Conduct chronic toxicity tests on the effluent from the outfall.	Dec. 31, 2005

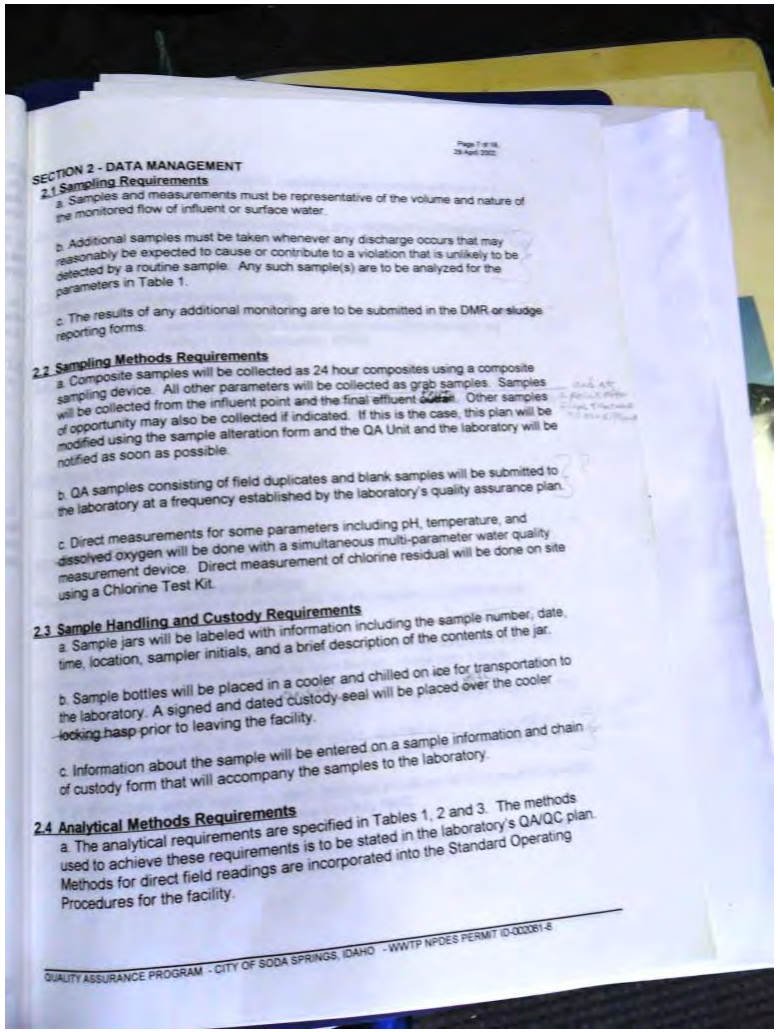
5.3 Equipment

a. Install flow-proportional sampling equipment for the collection of influent and effluent composite samples.	June 30, 2002

5.4 Contracted Laboratory

a. Laboratory to furnish their Quality Assurance/Control Plan	June 30, 2002
b. Laboratory to furnish a Statement of Qualifications to file	June 30, 2002
c. Laboratory to furnish methods to accomplish desired analytical accuracies and detection limits.	June 30, 2002

Photograph by David Domingo (EPA) on March 13, 2012 looking at the the City's QAP which describes qualification and training of personnel.



SECTION 2 - DATA MANAGEMENT

2.1 Sampling Requirements

a. Samples and measurements must be representative of the volume and nature of the monitored flow of influent or surface water.

b. Additional samples must be taken whenever any discharge occurs that may reasonably be expected to cause or contribute to a violation that is unlikely to be detected by a routine sample. Any such sample(s) are to be analyzed for the parameters in Table 1.

c. The results of any additional monitoring are to be submitted in the DMR ~~or sludge~~ reporting forms.

2.2 Sampling Methods Requirements

a. Composite samples will be collected as 24 hour composites using a composite sampling device. All other parameters will be collected as grab samples. Samples will be collected from the influent point and the final effluent ~~outfall~~. Other samples of opportunity may also be collected if indicated. If this is the case, this plan will be modified using the sample alteration form and the QA Unit and the laboratory will be notified as soon as possible.

b. QA samples consisting of field duplicates and blank samples will be submitted to the laboratory at a frequency established by the laboratory's quality assurance plan.

c. Direct measurements for some parameters including pH, temperature, and dissolved oxygen will be done with a simultaneous multi-parameter water quality measurement device. Direct measurement of chlorine residual will be done on site using a Chlorine Test Kit.

2.3 Sample Handling and Custody Requirements

a. Sample jars will be labeled with information including the sample number, date, time, location, sampler initials, and a brief description of the contents of the jar.

b. Sample bottles will be placed in a cooler and chilled on ice for transportation to the laboratory. A signed and dated custody seal will be placed over the cooler ~~locking hasp~~ prior to leaving the facility.

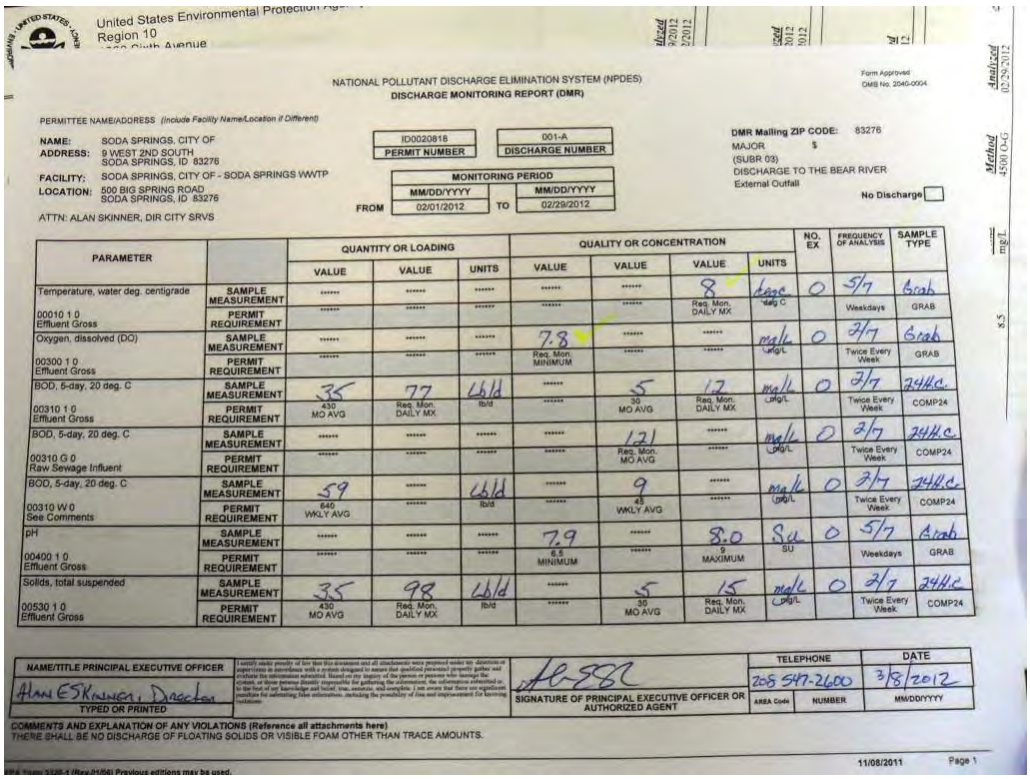
c. Information about the sample will be entered on a sample information and chain of custody form that will accompany the samples to the laboratory.

2.4 Analytical Methods Requirements

a. The analytical requirements are specified in Tables 1, 2 and 3. The methods used to achieve these requirements is to be stated in the laboratory's QA/QC plan. Methods for direct field readings are incorporated into the Standard Operating Procedures for the facility.

QUALITY ASSURANCE PROGRAM - CITY OF SODA SPRINGS, IDAHO - WWTP NPDES PERMIT ID-002081-8

Photograph by David Domingo (EPA) on March 13, 2012 looking at the City's QAP which describes sampling method requirements as well as sample handling and custody requirements.



United States Environmental Protection Agency
Region 10

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: SODA SPRINGS, CITY OF
ADDRESS: 9 WEST 2ND SOUTH
SODA SPRINGS, ID 83276
FACILITY: SODA SPRINGS, CITY OF - SODA SPRINGS WWTP
LOCATION: 500 BIG SPRING ROAD
SODA SPRINGS, ID 83276
ATTN: ALAN SKINNER, DIR CITY SRVS

PERMIT NUMBER: ID0020818
DISCHARGE NUMBER: 001-A

MONITORING PERIOD
FROM MM/DD/YYYY 02/01/2012 TO MM/DD/YYYY 02/29/2012

DMR Mailing ZIP CODE: 83276
MAJOR $
(SUBR 03)
DISCHARGE TO THE BEAR RIVER
External Outfall
No Discharge ☐

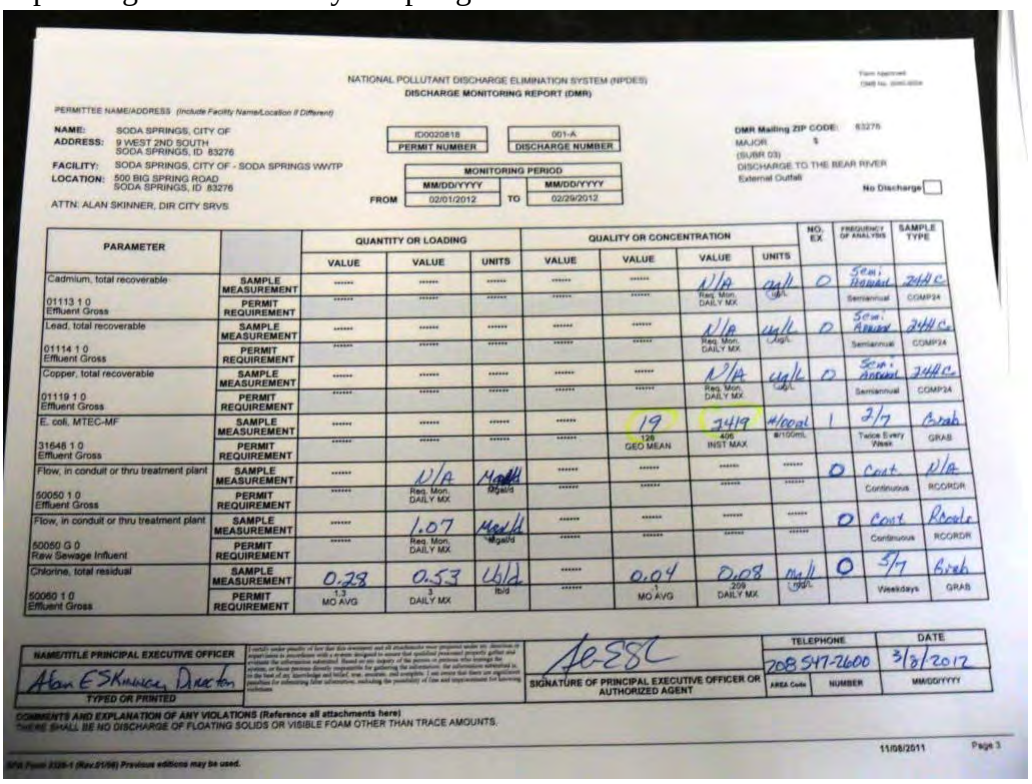
PARAMETER		QUANTITY OR LOADING VALUE	QUANTITY OR LOADING VALUE	QUANTITY OR LOADING UNITS	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Temperature, water deg. centigrade	SAMPLE MEASUREMENT	******	******	******	******	******	8	deg C	0	5/7	Grab
00010 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. DAILY MX			Weekdays	GRAB
Oxygen, dissolved (DO)	SAMPLE MEASUREMENT	******	******	******	7.8	******	******	mg/L	0	2/7	Grab
00300 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	Req. Mon. MINIMUM	******	******			Twice Every Week	GRAB
BOD, 5-day, 20 deg. C	SAMPLE MEASUREMENT	35	77	lb/d	******	5	12	mg/L	0	2/7	24Hr.
00310 1 0 Effluent Gross	PERMIT REQUIREMENT	430 MO AVG	Req. Mon. DAILY MX	lb/d	******	30 MO AVG	Req. Mon. DAILY MX			Twice Every Week	COMP24
BOD, 5-day, 20 deg. C	SAMPLE MEASUREMENT	******	******	******	******	121	******	mg/L	0	2/7	24Hr.
00310 G 0 Raw Sewage Influent	PERMIT REQUIREMENT	******	******	******	******	Req. Mon. MO AVG	******			Twice Every Week	COMP24
BOD, 5-day, 20 deg. C	SAMPLE MEASUREMENT	59	******	lb/d	******	9	******	mg/L	0	2/7	24Hr.
00310 W 0 See Comments	PERMIT REQUIREMENT	640 WKLY AVG	******	lb/d	******	45 WKLY AVG	******			Twice Every Week	COMP24
pH	SAMPLE MEASUREMENT	******	******	******	7.9	******	8.0	SU	0	5/7	Grab
00400 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	6.5 MINIMUM	******	9 MAXIMUM	SU		Weekdays	GRAB
Solids, total suspended	SAMPLE MEASUREMENT	35	98	lb/d	******	5	15	mg/L	0	2/7	24Hr.
00530 1 0 Effluent Gross	PERMIT REQUIREMENT	430 MO AVG	Req. Mon. DAILY MX	lb/d	******	30 MO AVG	Req. Mon. DAILY MX			Twice Every Week	COMP24

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER: Alan E Skinner, Director (TYPED OR PRINTED)
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
TELEPHONE: 208 547-2600 (AREA Code / NUMBER)
DATE: 3/8/2012 (MM/DD/YYYY)

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM OTHER THAN TRACE AMOUNTS.

EPA Form 3320-1 (Rev.01/96) Previous editions may be used. 11/08/2011 Page 1

Photograph by David Domingo (EPA) on March 13, 2012 looking at the February 2012 DMR. Note the City used the average monthly flow of 0.84 mgd to calculate the average monthly loadings for BOD and TSS instead of using the corresponding flow on the day sampling occurred.



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: SODA SPRINGS, CITY OF
ADDRESS: 9 WEST 2ND SOUTH
SODA SPRINGS, ID 83276
FACILITY: SODA SPRINGS, CITY OF - SODA SPRINGS WWTP
LOCATION: 500 BIG SPRING ROAD
SODA SPRINGS, ID 83276
ATTN: ALAN SKINNER, DIR CITY SRVS

PERMIT NUMBER: ID0020818
DISCHARGE NUMBER: 001-A

MONITORING PERIOD
FROM MM/DD/YYYY 02/01/2012 TO MM/DD/YYYY 02/29/2012

DMR Mailing ZIP CODE: 83276
MAJOR $
(SUBR 03)
DISCHARGE TO THE BEAR RIVER
External Outfall
No Discharge ☐

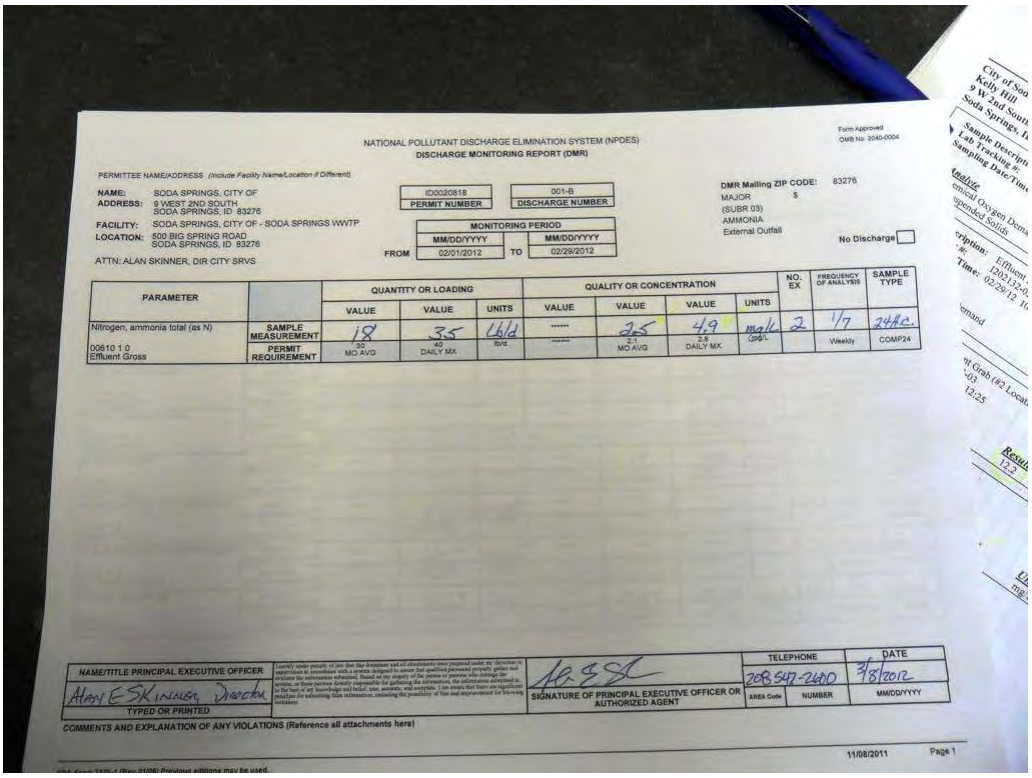
PARAMETER		QUANTITY OR LOADING VALUE	QUANTITY OR LOADING VALUE	QUANTITY OR LOADING UNITS	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION VALUE	QUALITY OR CONCENTRATION UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Cadmium, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	******	N/A	ug/L	0	Semi-Annual	24Hr.
01113 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. DAILY MX			Semiannual	COMP24
Lead, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	******	N/A	ug/L	0	Semi-Annual	24Hr.
01114 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. DAILY MX			Semiannual	COMP24
Copper, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	******	N/A	ug/L	0	Semi-Annual	24Hr.
01119 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	******	Req. Mon. DAILY MX			Semiannual	COMP24
E. coli, MTEC-MF	SAMPLE MEASUREMENT	******	******	******	******	19	2419	#/100ml	1	2/7	Grab
31648 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	126 GEO MEAN	406 INST MAX	&/100ml		Twice Every Week	GRAB
Flow, in conduit or thru treatment plant	SAMPLE MEASUREMENT	******	N/A	Mgd	******	******	******	******	0	Cont.	N/A
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	******	Req. Mon. DAILY MX	Mgd	******	******	******	******		Continuous	RCORDR
Flow, in conduit or thru treatment plant	SAMPLE MEASUREMENT	******	1.07	Mgd	******	******	******	******	0	Cont.	Recdr
50050 G 0 Raw Sewage Influent	PERMIT REQUIREMENT	******	Req. Mon. DAILY MX	Mgd	******	******	******	******		Continuous	RCORDR
Chlorine, total residual	SAMPLE MEASUREMENT	0.28	0.53	lb/d	******	0.04	0.08	mg/L	0	5/7	Grab
50060 1 0 Effluent Gross	PERMIT REQUIREMENT	1.3 MO AVG	3 DAILY MX	lb/d	******	1 MO AVG	2.9 DAILY MX			Weekdays	GRAB

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER: Alan E Skinner, Director (TYPED OR PRINTED)
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
TELEPHONE: 208 547-2600 (AREA Code / NUMBER)
DATE: 3/8/2012 (MM/DD/YYYY)

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM OTHER THAN TRACE AMOUNTS.

EPA Form 3320-1 (Rev.01/96) Previous editions may be used. 11/08/2011 Page 3

Photograph by David Domingo (EPA) on March 13, 2012 looking at the February 2012 DMR. Note the City reported a monthly geometric mean of 19; however the correct value is 17 / 100 ml. In addition, the City reported 2,419 / 100 ml for the instantaneous maximum; however according to Mr. Hill, the contract lab reported "> 2,419 / 100 ml".



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: SODA SPRINGS, CITY OF
ADDRESS: 9 WEST 2ND SOUTH, SODA SPRINGS, ID 83276
FACILITY: SODA SPRINGS, CITY OF - SODA SPRINGS WWTP
LOCATION: 500 BIG SPRING ROAD, SODA SPRINGS, ID 83276
ATTN: ALAN SKINNER, DIR CITY SRVS

PERMIT NUMBER: ID0020818
DISCHARGE NUMBER: 001-B

MONITORING PERIOD
FROM MM/DD/YYYY: 02/01/2012 TO MM/DD/YYYY: 02/29/2012

DMR Mailing ZIP CODE: 83276
MAJOR $
(SUBR 03)
AMMONIA
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Nitrogen, ammonia total (as N) 00610 1 0 Effluent Gross	SAMPLE MEASUREMENT	18	35	lb/d	------	25	4.9	mg/L	2	1/7	24Hr.
	PERMIT REQUIREMENT	52 MO AVG	43 DAILY MX	lb/d	------	2.1 MO AVG	2.8 DAILY MX	mg/L		Weekly	COMP24

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER: Alan E Skinner, Director (TYPED OR PRINTED)

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.

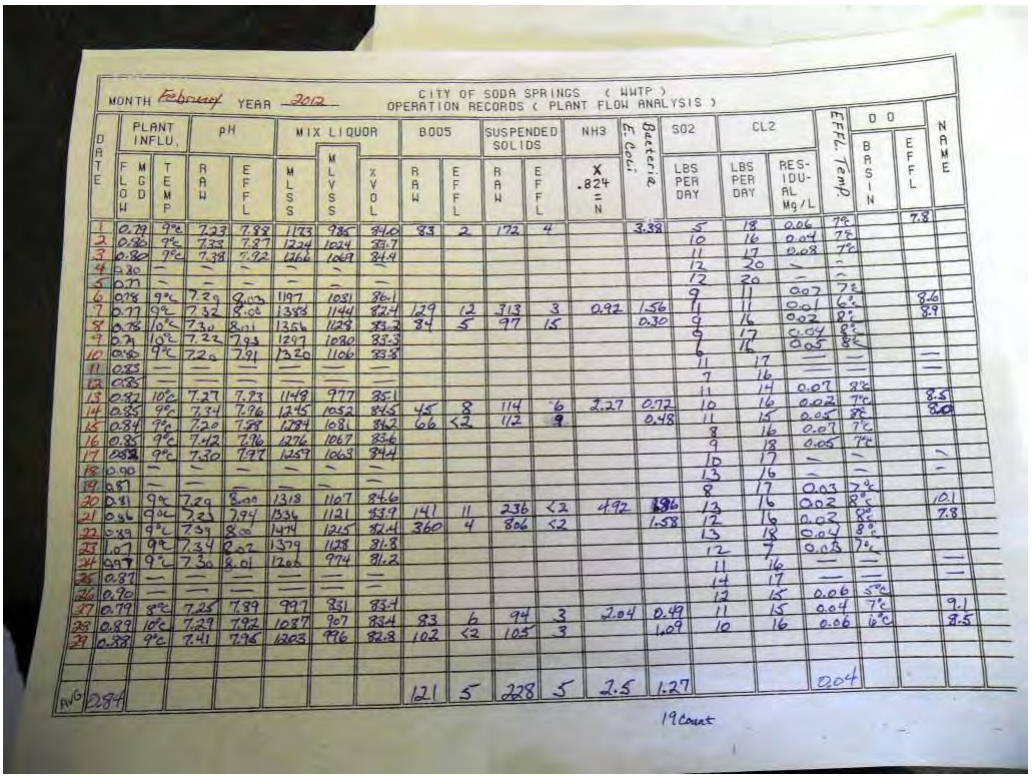
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 208 547-2400 (AREA Code / NUMBER)
DATE: 3/8/2012 (MM/DD/YYYY)

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

11/08/2011 Page 1

Photograph by David Domingo (EPA) on March 13, 2012 looking at the February 2012 DMR. Note the City used the average monthly flow of 0.84 mgd to calculate the average monthly loading for NH_3 instead of using the corresponding flow on the day sampling occurred.

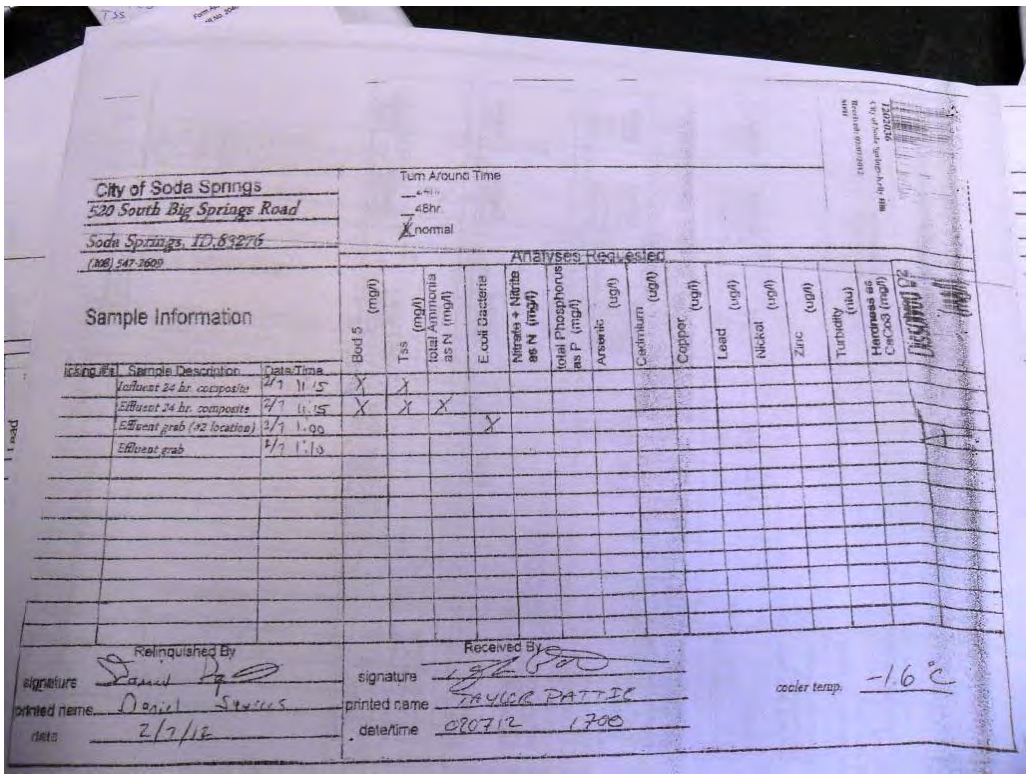


MONTH February YEAR 2012
CITY OF SODA SPRINGS (WWTP)
OPERATION RECORDS (PLANT FLOW ANALYSIS)

DATE	PLANT INFLU. FLOW MGD	PLANT INFLU. TEMP	pH RAW	pH EFFL	MIX LIQUOR MLSS	MIX LIQUOR MLVSS	MIX LIQUOR % VOL	BOD5 RAW	BOD5 EFFL	SUSPENDED SOLIDS RAW	SUSPENDED SOLIDS EFFL	NH3 X .824 = N	E. Coli Bacteria	SO2 LBS PER DAY	CL2 LBS PER DAY	CL2 RESIDUAL Mg/L	EFFL. Temp	DO BASIN	DO EFFL	NAME
1	0.79	9°C	7.23	7.88	1173	985	84.0	83	2	172	4		3.38	5	18	0.06	7°C		7.8	
2	0.80	9°C	7.33	7.87	1224	1024	83.7							10	16	0.04	7°C			
3	0.80	9°C	7.38	7.92	1266	1069	84.4							11	17	0.08	7°C			
4	0.80	—	—	—	—	—	—							12	20	—	—			
5	0.77	—	—	—	—	—	—							12	20	—	—			
6	0.78	9°C	7.29	8.03	1197	1081	86.1							9	11	0.07	7°C		8.6	
7	0.77	9°C	7.32	8.08	1383	1144	82.4	129	12	313	3	0.92	1.56	11	11	0.01	6°C		8.9	
8	0.78	10°C	7.30	8.01	1356	1129	83.2	84	5	97	15		0.30	9	16	0.02	8°C			
9	0.71	10°C	7.22	7.93	1297	1080	83.3							9	17	0.04	8°C			
10	0.80	9°C	7.20	7.91	1320	1106	83.8							6	16	0.05	8°C			
11	0.85	—	—	—	—	—	—							11	17	—	—		—	
12	0.85	—	—	—	—	—	—							7	16	—	—		—	
13	0.82	10°C	7.27	7.93	1149	977	85.1							11	14	0.07	8°C			
14	0.85	9°C	7.34	7.96	1245	1052	84.5	45	8	114	6	2.27	0.72	10	16	0.02	7°C		8.5	
15	0.84	9°C	7.20	7.88	1284	1081	84.2	66	<2	112	9		0.48	11	15	0.05	8°C		8.0	
16	0.85	9°C	7.42	7.96	1276	1067	83.6							8	16	0.07	7°C			
17	0.82	9°C	7.30	7.97	1259	1063	84.4							9	18	0.05	7°C			
18	0.90	—	—	—	—	—	—							10	17	—	—		—	
19	0.81	—	—	—	—	—	—							13	16	—	—		—	
20	0.81	9°C	7.29	8.00	1318	1107	84.6							8	17	0.03	7°C			
21	0.86	9°C	7.33	7.94	1336	1121	83.9	141	11	236	<2	4.92	3.96	13	16	0.02	8°C		10.1	
22	0.89	9°C	7.39	8.00	1474	1215	82.4	360	4	806	<2		1.58	12	16	0.02	8°C		7.8	
23	1.07	9°C	7.34	8.02	1379	1128	81.8							13	18	0.04	8°C			
24	0.97	9°C	7.30	8.01	1265	974	81.2							12	7	0.03	7°C			
25	0.87	—	—	—	—	—	—							11	16	—	—		—	
26	0.70	—	—	—	—	—	—							14	17	—	—		—	
27	0.79	8°C	7.25	7.89	997	831	83.4							12	15	0.06	8°C			
28	0.83	10°C	7.29	7.92	1087	907	83.4	83	6	94	3	2.04	0.49	11	15	0.04	7°C		9.1	
29	0.88	9°C	7.41	7.96	1203	996	82.8	102	<2	105	3		1.09	10	16	0.06	6°C		8.5	
AVG	0.84							121	5	228	5	2.5	1.27			0.04				

19 Count

Photograph by David Domingo (EPA) on March 13, 2012 looking at the operator's log book for February 2012. Note the average monthly flow of 0.84 mgd. For calculating the average monthly result for BOD, the City used "0" for the "< 2" result on February 15 which is consistent with Part I.A.2 of the Permit.



City of Soda Springs
520 South Big Springs Road
Soda Springs, ID 83276
(208) 547-3609

Turn Around Time
48hr.
X normal

Analyses Requested

Sample Information

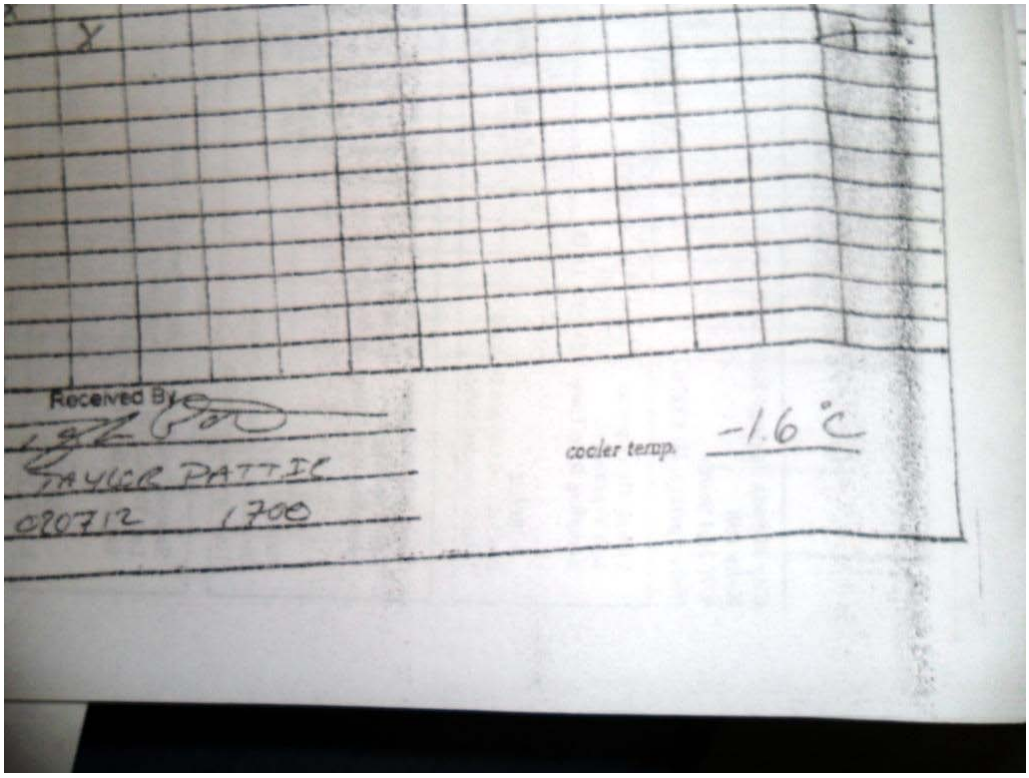
Bottle/Ref.	Sample Description	Date/Time	Bod 5 (mg/l)	Tss (mg/l)	total Ammonia as N (mg/l)	E.coli Bacteria	Nitrate + Nitrite as N (mg/l)	total Phosphorus as P (mg/l)	Arsenic (ug/l)	Cadmium (ug/l)	Copper (ug/l)	Lead (ug/l)	Nickel (ug/l)	Zinc (ug/l)	Turbidity (ntu)	Hardness as CaCO3 (mg/l)	Dissolved O2 (mg/l)
	Influent 24 hr. composite	2/7 11:15	X	X													
	Effluent 24 hr. composite	2/7 11:15	X	X	X												
	Effluent grab (#2 location)	2/7 1:00				X											
	Effluent grab	2/7 1:10															

Relinquished By
signature
printed name Daniel Sykes
date 2/7/12

Received By
signature
printed name TAYLOR PATTIE
date/time 020712 1700

cooler temp. -1.6 °C

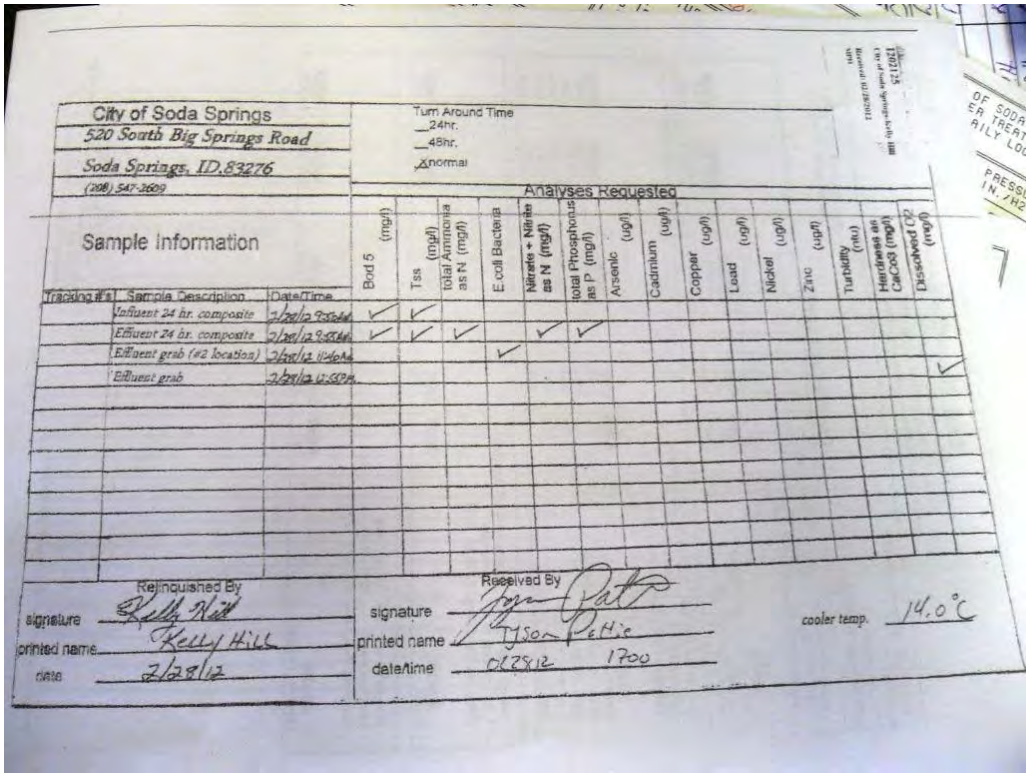
Photograph by David Domingo (EPA) on March 13, 2012 looking at the February 7, 2012 chain of custody form. Note the temperature of the cooler when samples were received by the contract laboratory was -1.6°C.



Received By
TAYLOR PATTIE
020712 1700

cooler temp. -1.6 °C

Photograph by David Domingo (EPA) on March 13, 2012 looking at the February 7, 2012 chain of custody form. Note the temperature of the cooler when samples were received by the contract laboratory was -1.6°C.



City of Soda Springs
520 South Big Springs Road
Soda Springs, ID.83276
(208) 547-3609

Turn Around Time
__24hr.
__48hr.
X normal

Analyses Requested

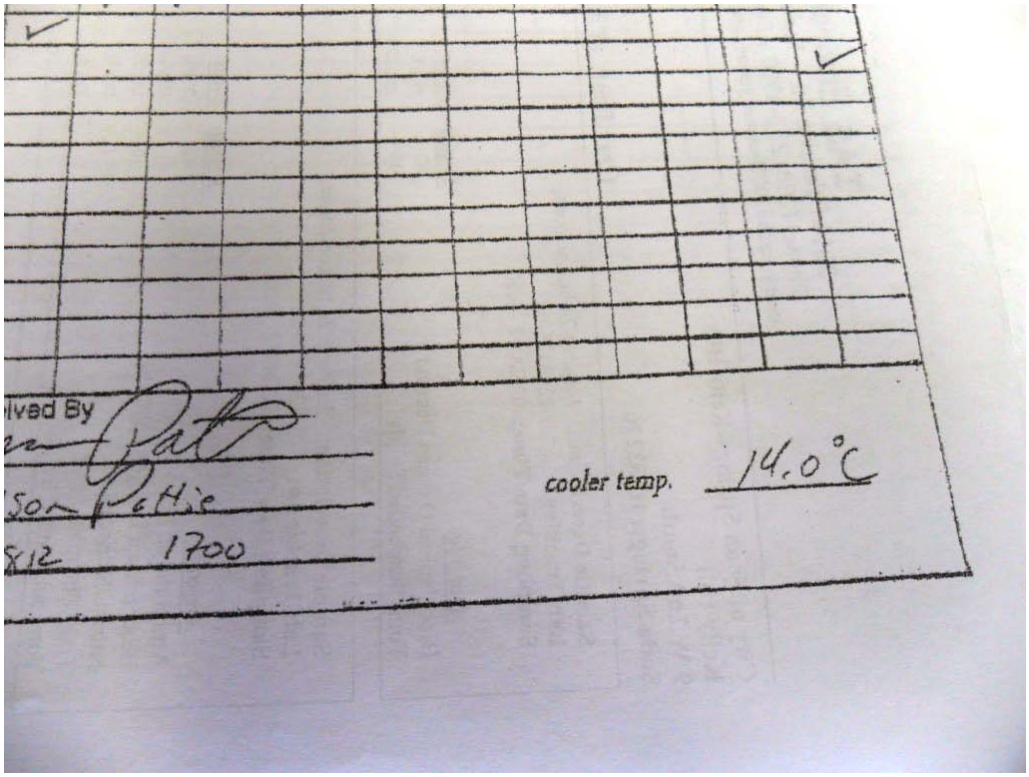
Sample Information			Bod 5 (mg/l)	Tss (mg/l)	total Ammonia as N (mg/l)	E coli Bacteria	Nitrate + Nitrite as N (mg/l)	total Phosphorus as P (mg/l)	Arsenic (ug/l)	Cadmium (ug/l)	Copper (ug/l)	Lead (ug/l)	Nickel (ug/l)	Zinc (ug/l)	Turbidity (ntu)	Hardness as CaCO3 (mg/l)	Dissolved O2 (mg/l)
Tracking #'s	Sample Description	Date/Time															
	Influent 24 hr. composite	2/28/12 9:50AM	✓	✓													
	Effluent 24 hr. composite	2/28/12 9:50AM	✓	✓	✓		✓	✓									
	Effluent grab (#2 location)	2/28/12 11:40AM				✓											
	Effluent grab	2/28/12 12:50PM															✓

Relinquished By
signature: Kelly Hill
printed name: Kelly Hill
date: 2/28/12

Received By
signature: [illegible]
printed name: Tyson Pettie
date/time: 02/28/12 1700

cooler temp. 14.0°C

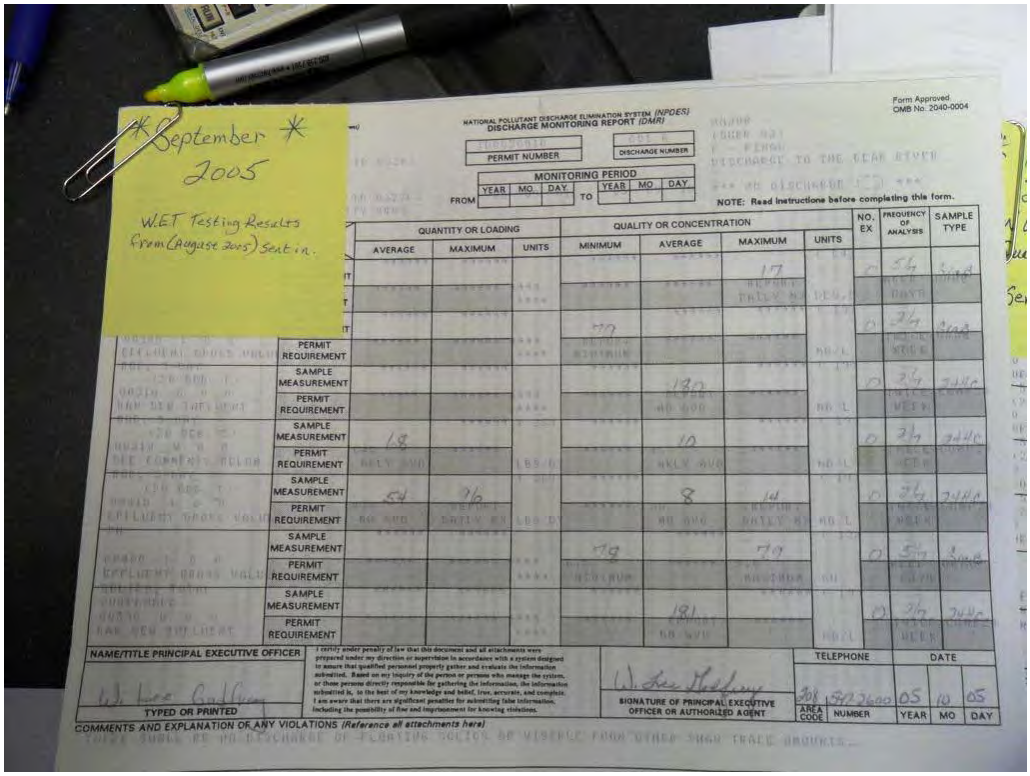
Photograph by David Domingo (EPA) on March 13, 2012 looking at the February 28, 2012 chain of custody form. Note the temperature of the cooler when samples were received by the contract laboratory was 14°C.



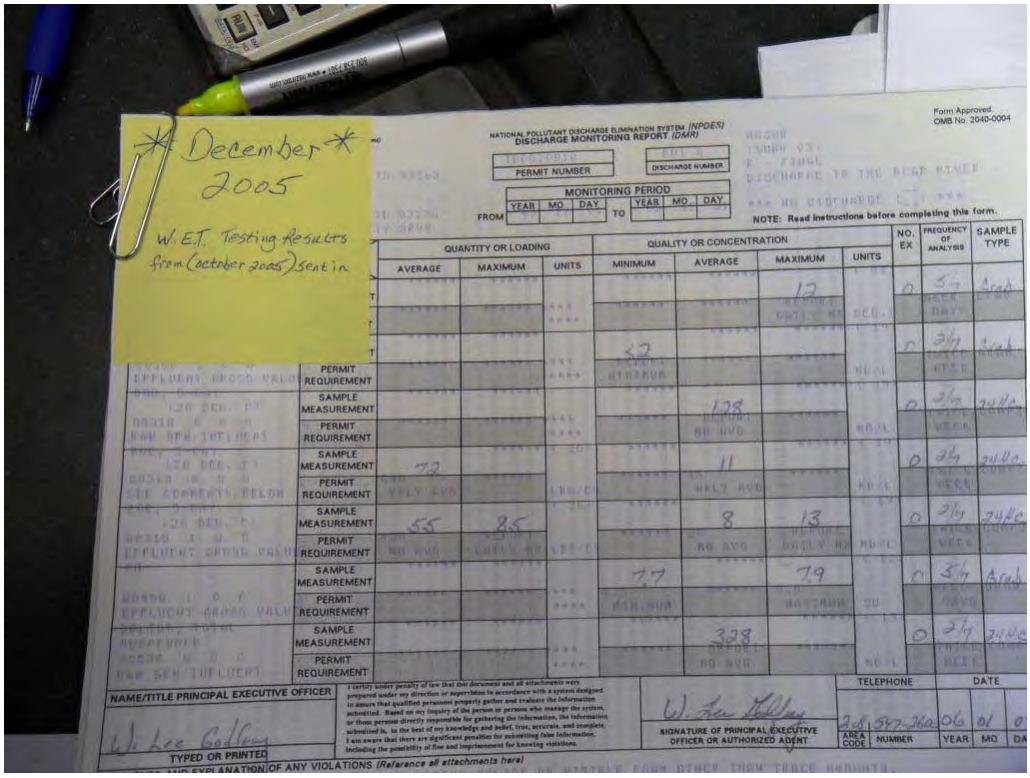
ived By
[illegible]
son Pettie
12 1700

cooler temp. 14.0°C

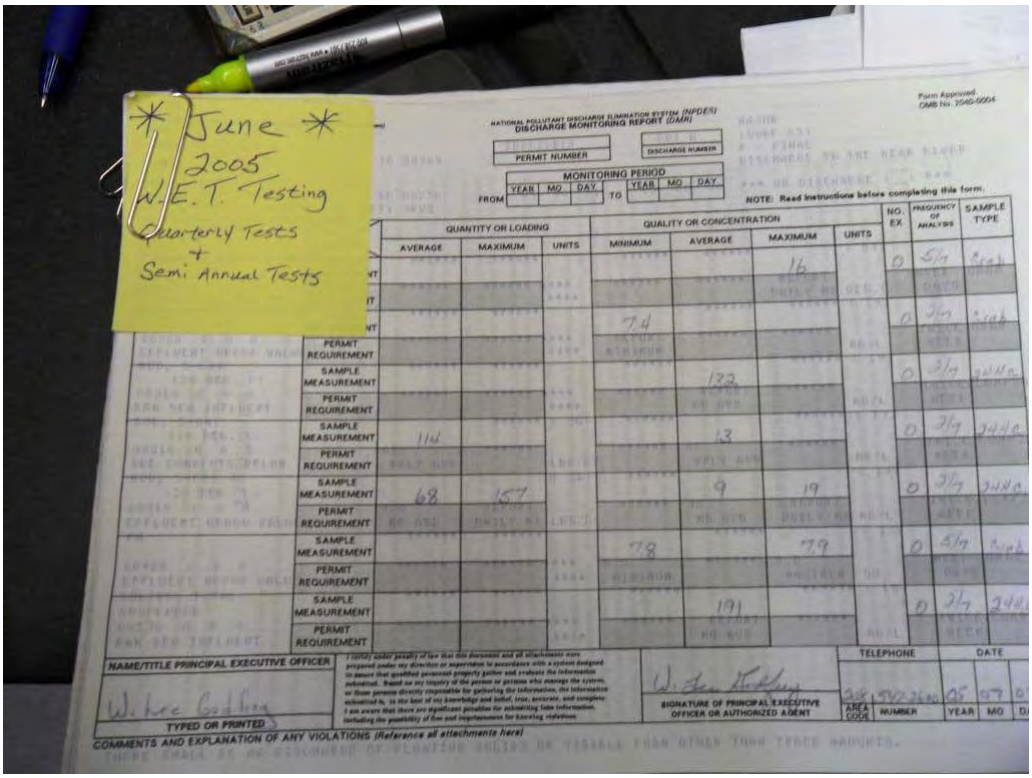
Photograph by David Domingo (EPA) on March 13, 2012 looking at the February 28, 2012 chain of custody form. Note the temperature of the cooler when samples were received by the contract laboratory was 14°C.



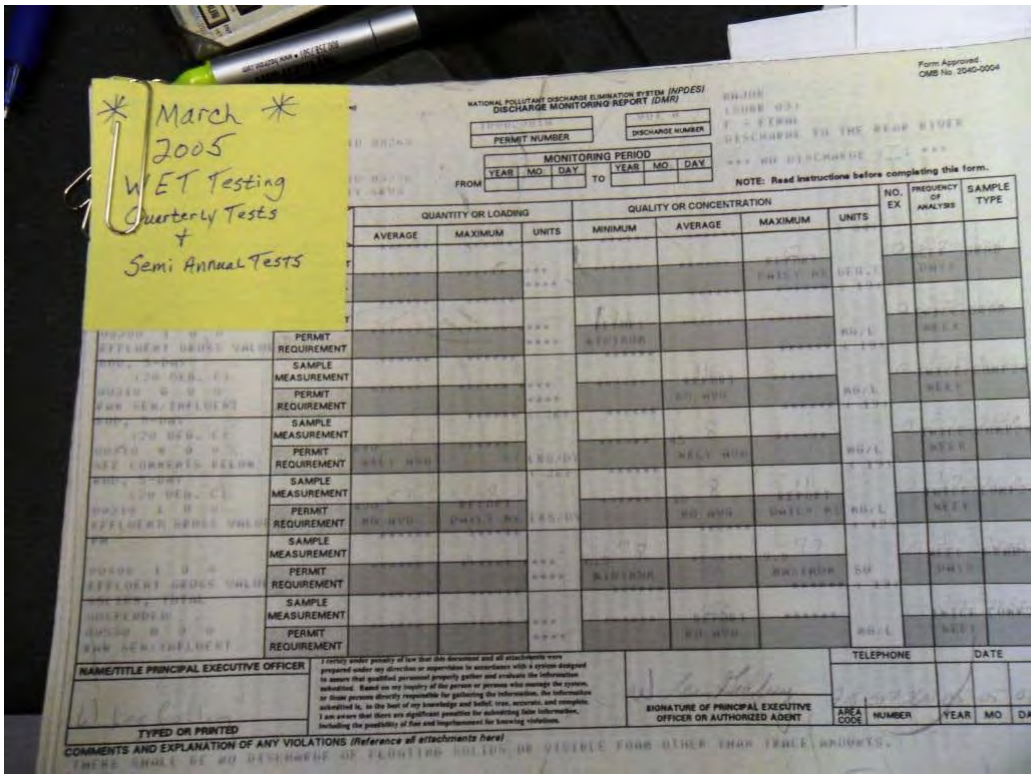
Photograph by David Domingo (EPA) on March 13, 2012 looking at the September 2005 DMR which includes the August 2005 WET testing results submitted in accordance with Part I.C.4 of the Permit.



Photograph by David Domingo (EPA) on March 13, 2012 looking at the December 2005 DMR which includes the October 2005 WET testing results submitted in accordance with Part I.C.4 of the Permit.

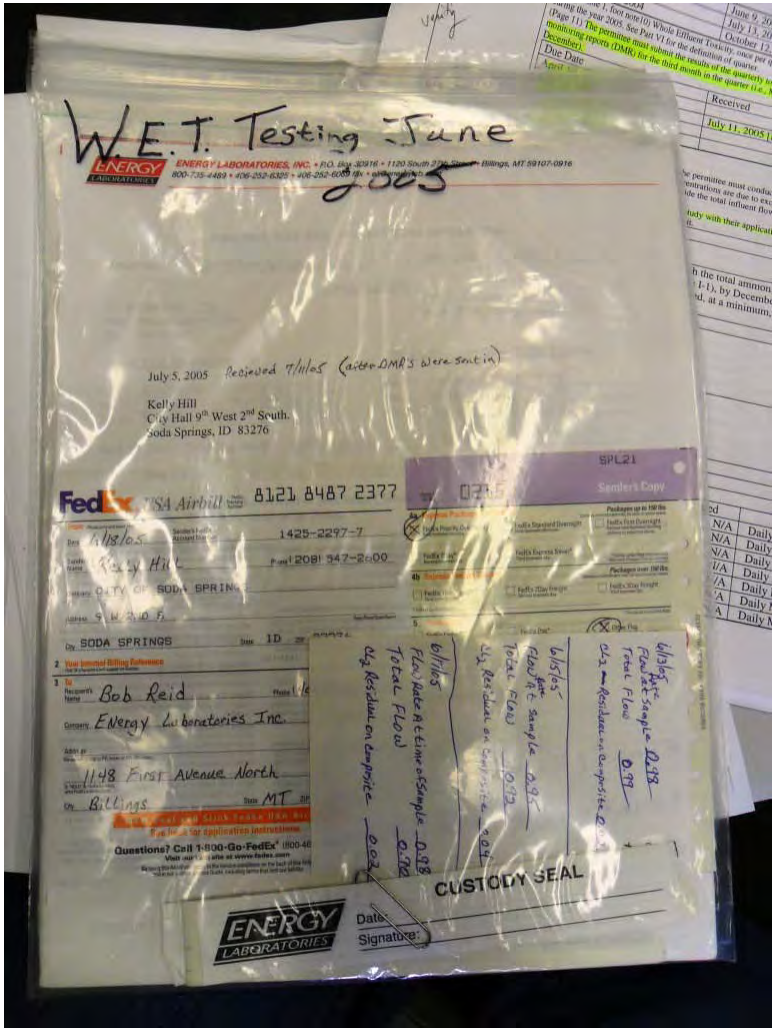


Photograph by David Domingo (EPA) on March 13, 2012 looking at the June 2005 WET testing results submitted in accordance with Part I.C.4 of the Permit.

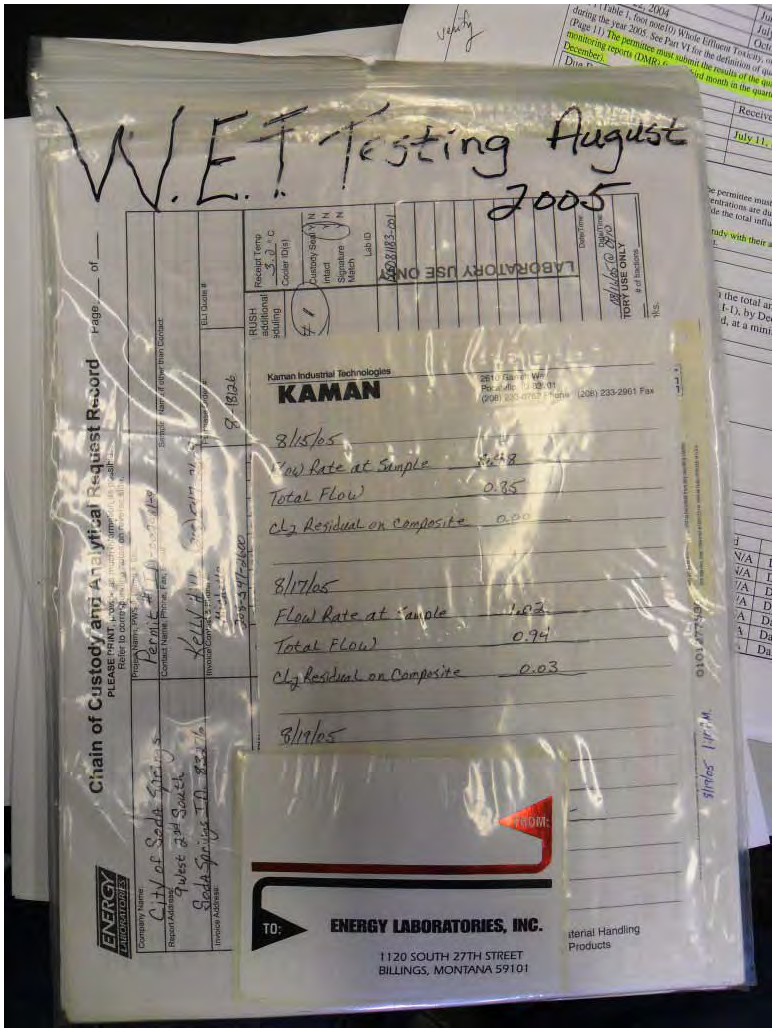


Photograph by David Domingo (EPA) on March 13, 2012 looking at the March 2005 WET testing results submitted in accordance with Part I.C.4 of the Permit.

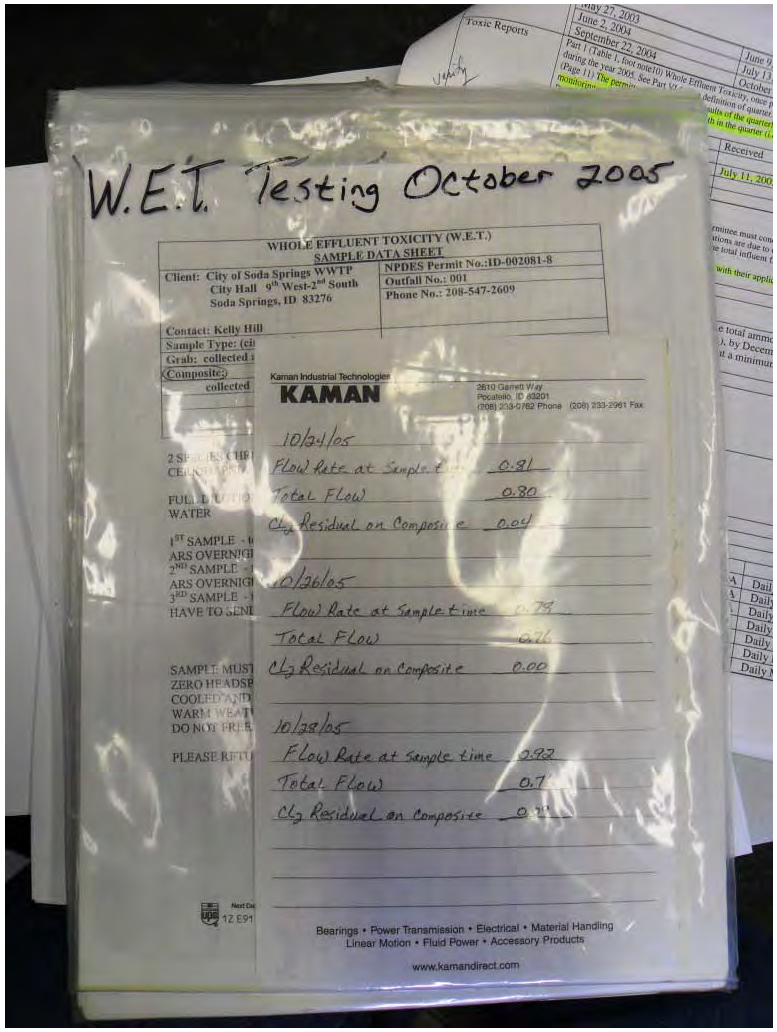
Photograph by David Domingo (EPA) on March 13, 2012 looking at the March 2005 WET testing results.



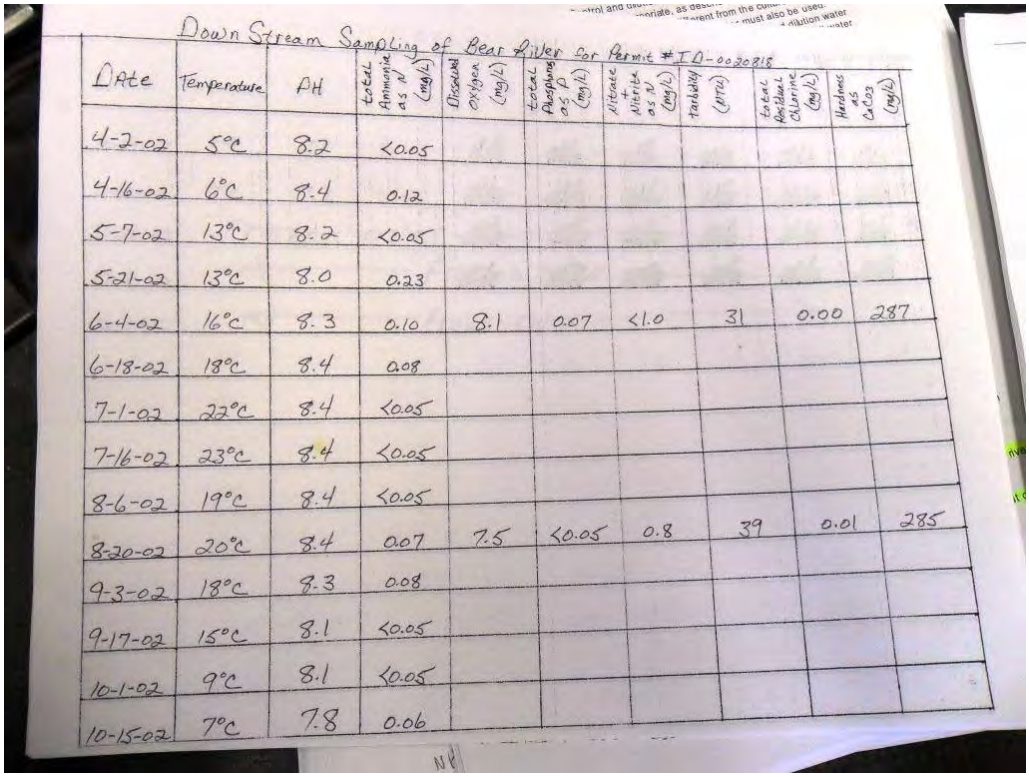
Photograph by David Domingo (EPA) on March 13, 2012 looking at the June 2005 WET testing results.



Photograph by David Domingo (EPA) on March 13, 2012 looking at the August 2005 WET testing results.



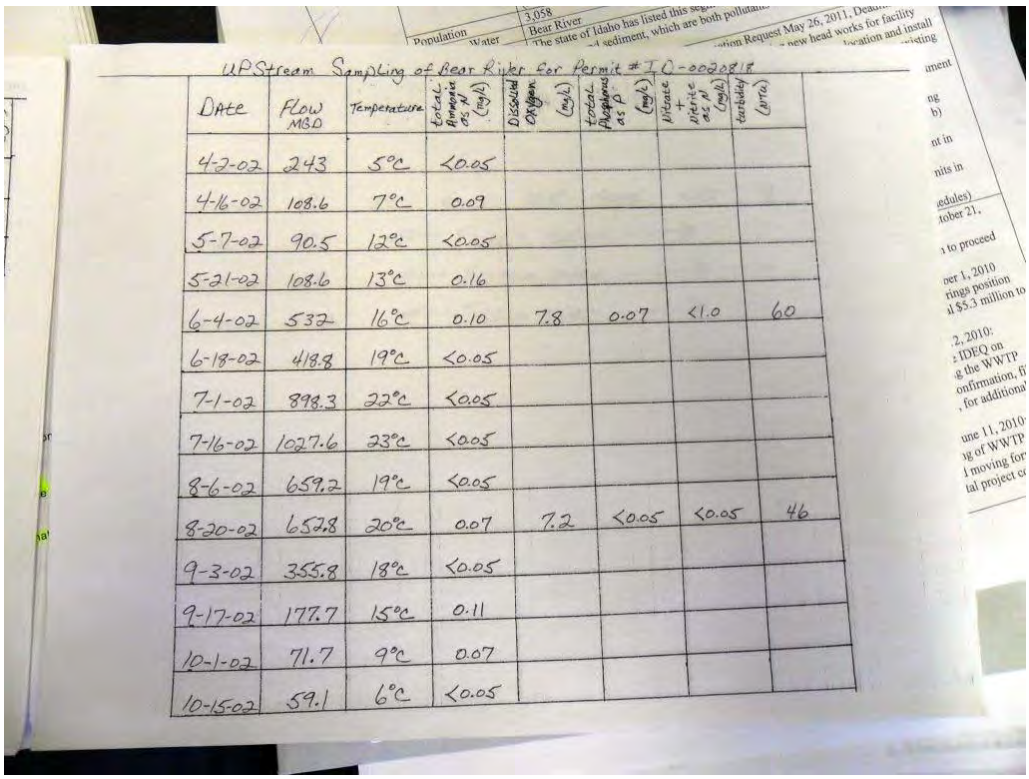
Photograph by David Domingo (EPA) on March 13, 2012 looking at the October 2005 WET testing results.



Down Stream Sampling of Bear River for Permit # ID-0020818

Date	Temperature	PH	total Ammonia as N (mg/L)	Dissolved oxygen (mg/L)	total Phosphorus as P (mg/L)	Nitrate + Nitrite as N (mg/L)	turbidity (NTU)	total Residual Chlorine (mg/L)	Hardness as CaCO3 (mg/L)
4-2-02	5°C	8.2	<0.05						
4-16-02	6°C	8.4	0.12						
5-7-02	13°C	8.2	<0.05						
5-21-02	13°C	8.0	0.23						
6-4-02	16°C	8.3	0.10	8.1	0.07	<1.0	31	0.00	287
6-18-02	18°C	8.4	0.08						
7-1-02	22°C	8.4	<0.05						
7-16-02	23°C	8.4	<0.05						
8-6-02	19°C	8.4	<0.05						
8-20-02	20°C	8.4	0.07	7.5	<0.05	0.8	39	0.01	285
9-3-02	18°C	8.3	0.08						
9-17-02	15°C	8.1	<0.05						
10-1-02	9°C	8.1	<0.05						
10-15-02	7°C	7.8	0.06						

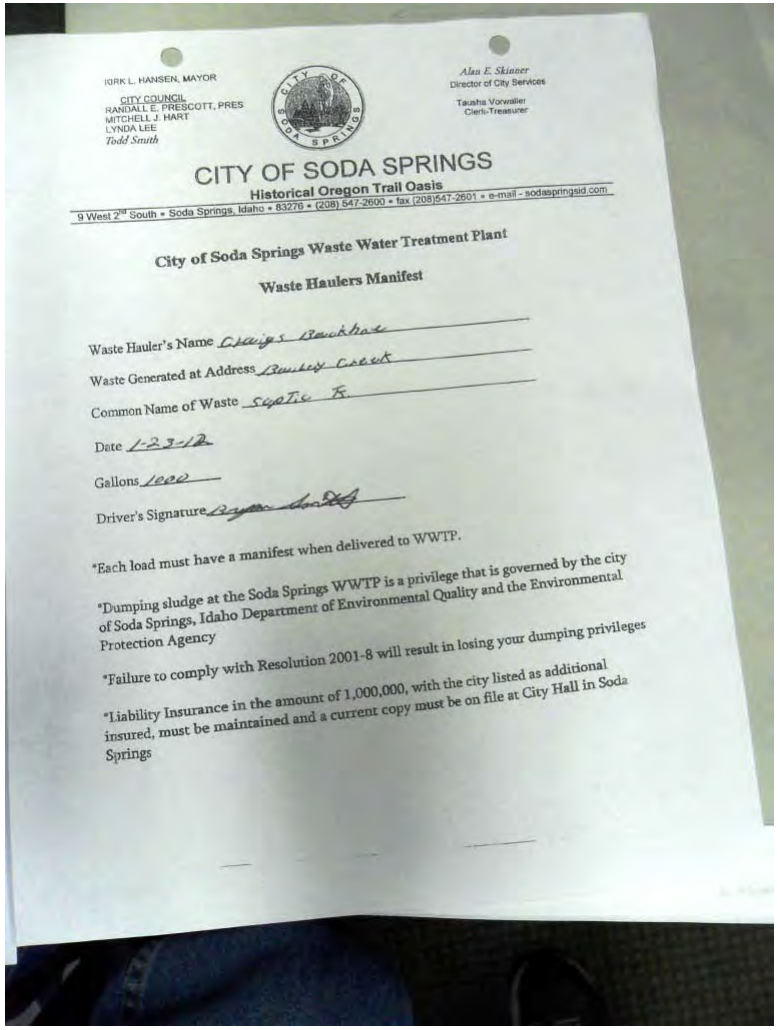
Photograph by David Domingo (EPA) on March 13, 2012 looking at the operator's log book for the downstream sampling results for the Bear River.



UPStream Sampling of Bear River for Permit # ID-0020818

Date	Flow MGD	Temperature	total Ammonia as N (mg/L)	Dissolved Oxygen (mg/L)	total Phosphorus as P (mg/L)	Nitrate + Nitrite as N (mg/L)	turbidity (NTU)
4-2-02	243	5°C	<0.05				
4-16-02	108.6	7°C	0.09				
5-7-02	90.5	12°C	<0.05				
5-21-02	108.6	13°C	0.16				
6-4-02	537	16°C	0.10	7.8	0.07	<1.0	60
6-18-02	418.8	19°C	<0.05				
7-1-02	898.3	22°C	<0.05				
7-16-02	1027.6	23°C	<0.05				
8-6-02	659.2	19°C	<0.05				
8-20-02	657.8	20°C	0.07	7.2	<0.05	<0.05	46
9-3-02	355.8	18°C	<0.05				
9-17-02	177.7	15°C	0.11				
10-1-02	71.7	9°C	0.07				
10-15-02	59.1	6°C	<0.05				

Photograph by David Domingo (EPA) on March 13, 2012 looking at the operator's log book for the upstream sampling results for the Bear River.



IGRK L. HANSEN, MAYOR

CITY COUNCIL
RANDALL E. PRESCOTT, PRES
MITCHELL J. HART
LYNDA LEE
Todd Smith

Alan E. Skinner
Director of City Services

Tausha Vorwaller
Clerk-Treasurer

CITY OF SODA SPRINGS
Historical Oregon Trail Oasis
9 West 2nd South • Soda Springs, Idaho • 83276 • (208) 547-2600 • fax (208)547-2601 • e-mail - sodaspringsid.com

City of Soda Springs Waste Water Treatment Plant

Waste Haulers Manifest

Waste Hauler's Name Craigs Backhoe

Waste Generated at Address Bailey Creek

Common Name of Waste Septic R.

Date 1-23-12

Gallons 1000

Driver's Signature

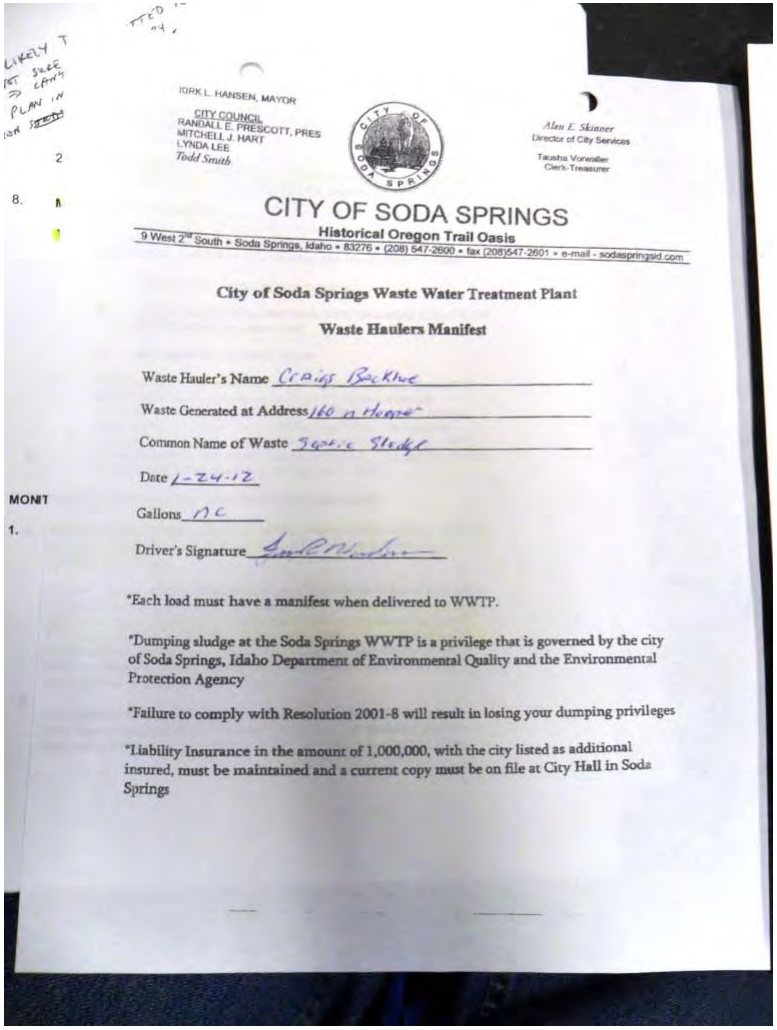
*Each load must have a manifest when delivered to WWTP.

*Dumping sludge at the Soda Springs WWTP is a privilege that is governed by the city of Soda Springs, Idaho Department of Environmental Quality and the Environmental Protection Agency

*Failure to comply with Resolution 2001-8 will result in losing your dumping privileges

*Liability Insurance in the amount of 1,000,000, with the city listed as additional insured, must be maintained and a current copy must be on file at City Hall in Soda Springs

Photograph by David Domingo (EPA) on March 13, 2012 looking at the January 23, 2012 waste haulers manifest as required in Part I.H of the Permit. Note that the manifest requires the address where waste was generated and the common name of the waste but does not contain a specific statement that the hauled waste being discharged is only domestic in nature.



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City of Soda Springs Waste Water Treatment Plant

Waste Haulers Manifest

Waste Hauler's Name Craigs Backhoe

Waste Generated at Address 160 n Hooper

Common Name of Waste Septic Sludge

Date 1-24-12

Gallons NC

Driver's Signature

*Each load must have a manifest when delivered to WWTP.

*Dumping sludge at the Soda Springs WWTP is a privilege that is governed by the city of Soda Springs, Idaho Department of Environmental Quality and the Environmental Protection Agency

*Failure to comply with Resolution 2001-8 will result in losing your dumping privileges

*Liability Insurance in the amount of 1,000,000, with the city listed as additional insured, must be maintained and a current copy must be on file at City Hall in Soda Springs

Photograph by David Domingo (EPA) on March 13, 2012 looking at the January 24, 2012 waste haulers manifest as required in Part I.H of the Permit. Note that the manifest requires the address where waste was generated and the common name of the waste but does not contain a specific statement that the hauled waste being discharged is only domestic in nature.

KIRK L. HANSEN, MAYOR

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TODD SMITH

Alan E. Skinner
Director of City Services

Tausha Vorwaller
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CITY OF SODA SPRINGS

Historical Oregon Trail Oasis

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March 17, 2011

To Whom It May Concern:

This letter is in regards to the City of Soda Springs Waste Water Treatment Plant (WWTP) being out of compliance for ammonia and updating the Environmental Protection Agency (EPA) on the status of the Soda Springs WWTP project.

The attached DMR details February 2011 and indicates no violations for the period.

Progress since the last correspondence includes receiving the 100% prints for the Headworks portion of the project. Review is complete and submission to IDEQ for review is underway. Work is also progressing on the secondary and tertiary portions of the WWTP.

A conference call was held with the EPA concerning violations between 2006 and 2010. I am preparing a milestone breakdown of construction activity during the project. This schedule will be forwarded by the end of March.

The City of Soda Springs requests and update from the EPA on the status of the NPDES permit for the Soda Springs WWTP, and an update of EPA's stance on the recently completed TMDL recommendations by IDEQ that affect the Bear River.

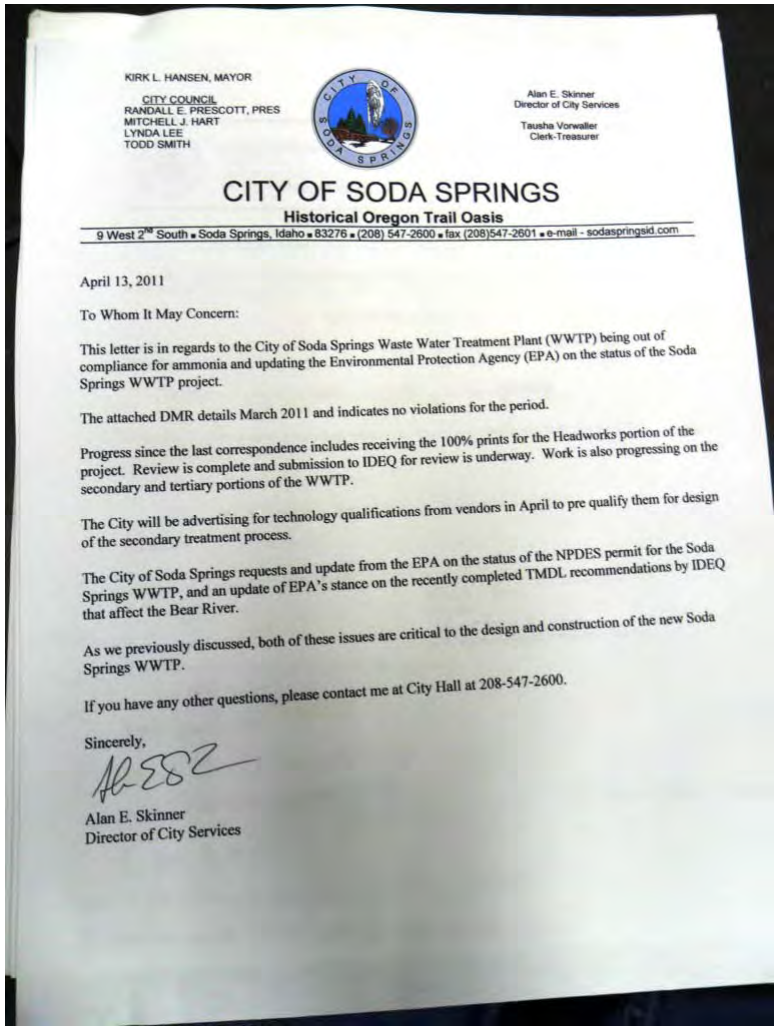
As we previously discussed, both of these issues are critical to the design and construction of the new Soda Springs WWTP.

If you have any other questions, please contact me at City Hall at 208-547-2600.

Sincerely,

Alan E. Skinner
Director of City Services

Photograph by David Domingo (EPA) on March 13, 2012 looking at March 17, 2011 correspondence describing the status of facility upgrades.



KIRK L. HANSEN, MAYOR

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CITY OF SODA SPRINGS

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April 13, 2011

To Whom It May Concern:

This letter is in regards to the City of Soda Springs Waste Water Treatment Plant (WWTP) being out of compliance for ammonia and updating the Environmental Protection Agency (EPA) on the status of the Soda Springs WWTP project.

The attached DMR details March 2011 and indicates no violations for the period.

Progress since the last correspondence includes receiving the 100% prints for the Headworks portion of the project. Review is complete and submission to IDEQ for review is underway. Work is also progressing on the secondary and tertiary portions of the WWTP.

The City will be advertising for technology qualifications from vendors in April to pre qualify them for design of the secondary treatment process.

The City of Soda Springs requests and update from the EPA on the status of the NPDES permit for the Soda Springs WWTP, and an update of EPA's stance on the recently completed TMDL recommendations by IDEQ that affect the Bear River.

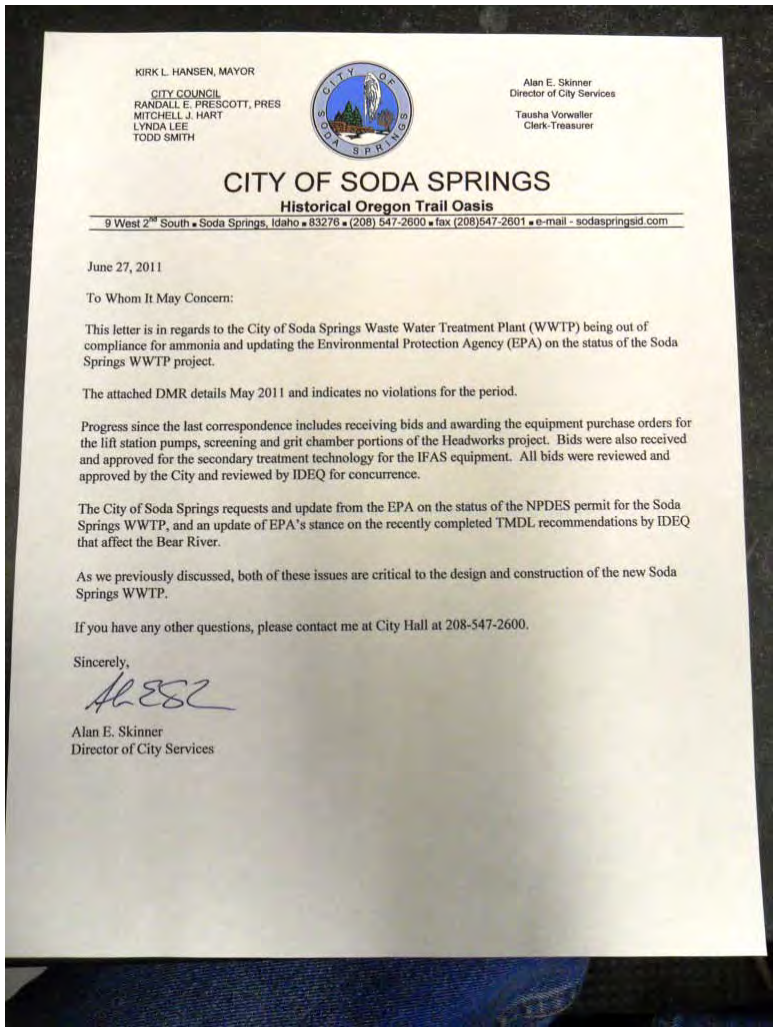
As we previously discussed, both of these issues are critical to the design and construction of the new Soda Springs WWTP.

If you have any other questions, please contact me at City Hall at 208-547-2600.

Sincerely,

Alan E. Skinner
Director of City Services

Photograph by David Domingo (EPA) on March 13, 2012 looking at April 13, 2011 correspondence describing the status of facility upgrades.



KIRK L. HANSEN, MAYOR

CITY COUNCIL
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CITY OF SODA SPRINGS

Historical Oregon Trail Oasis

9 West 2nd South ▪ Soda Springs, Idaho ▪ 83276 ▪ (208) 547-2600 ▪ fax (208)547-2601 ▪ e-mail - sodaspringsid.com

June 27, 2011

To Whom It May Concern:

This letter is in regards to the City of Soda Springs Waste Water Treatment Plant (WWTP) being out of compliance for ammonia and updating the Environmental Protection Agency (EPA) on the status of the Soda Springs WWTP project.

The attached DMR details May 2011 and indicates no violations for the period.

Progress since the last correspondence includes receiving bids and awarding the equipment purchase orders for the lift station pumps, screening and grit chamber portions of the Headworks project. Bids were also received and approved for the secondary treatment technology for the IFAS equipment. All bids were reviewed and approved by the City and reviewed by IDEQ for concurrence.

The City of Soda Springs requests and update from the EPA on the status of the NPDES permit for the Soda Springs WWTP, and an update of EPA's stance on the recently completed TMDL recommendations by IDEQ that affect the Bear River.

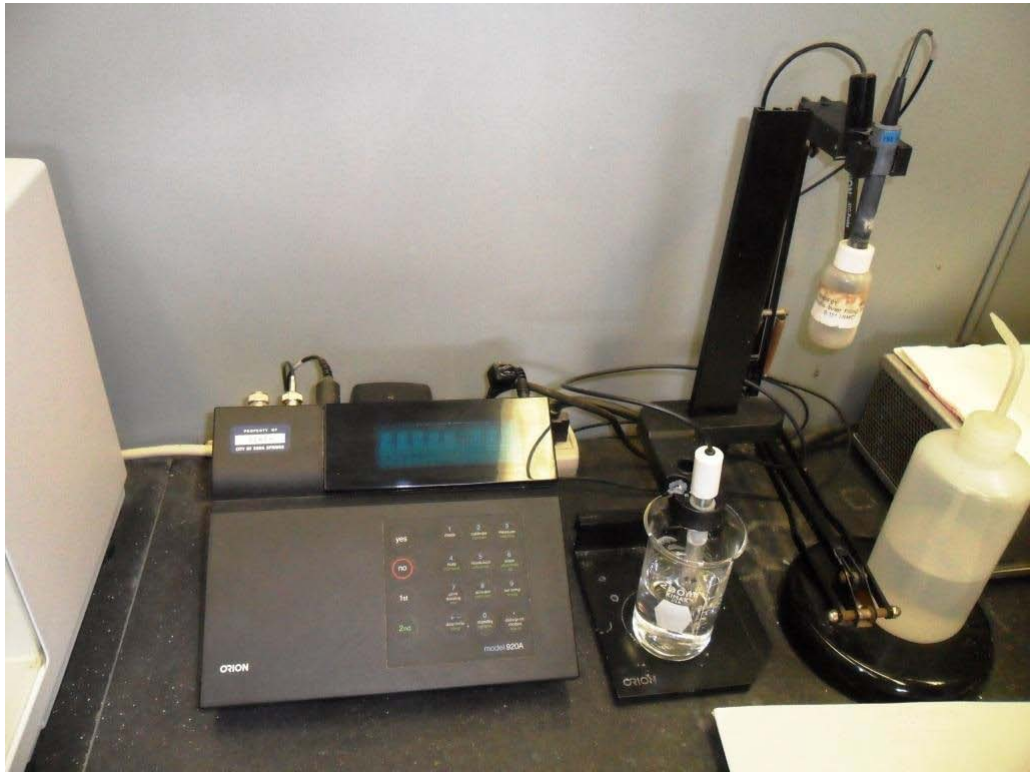
As we previously discussed, both of these issues are critical to the design and construction of the new Soda Springs WWTP.

If you have any other questions, please contact me at City Hall at 208-547-2600.

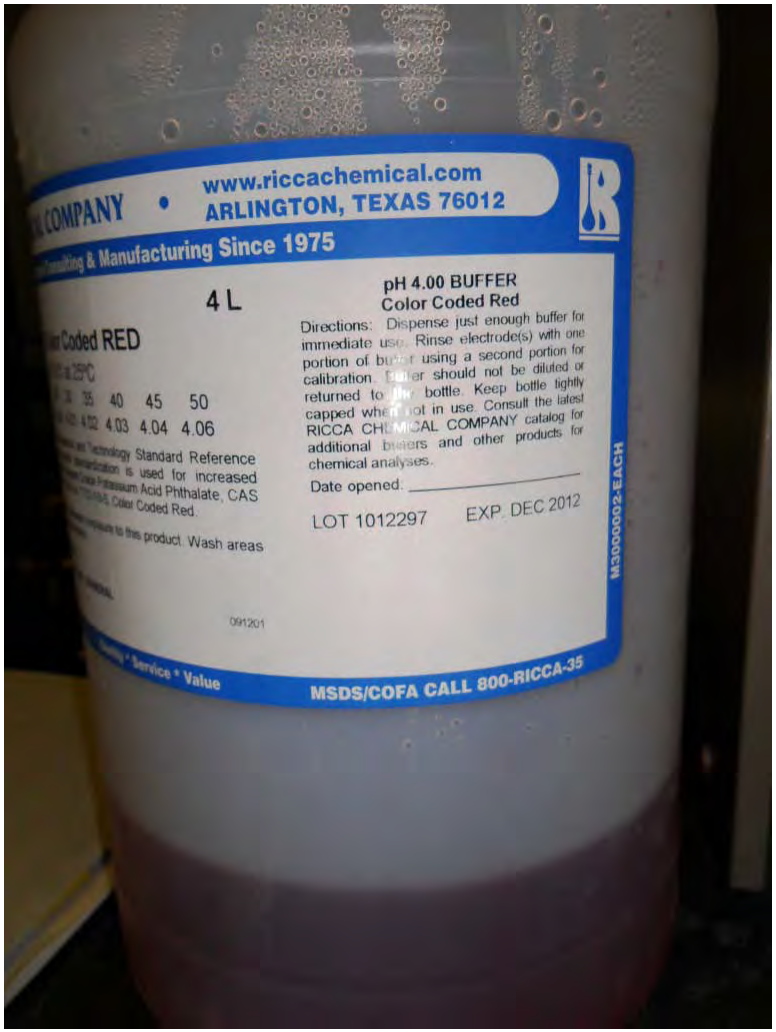
Sincerely,

Alan E. Skinner
Director of City Services

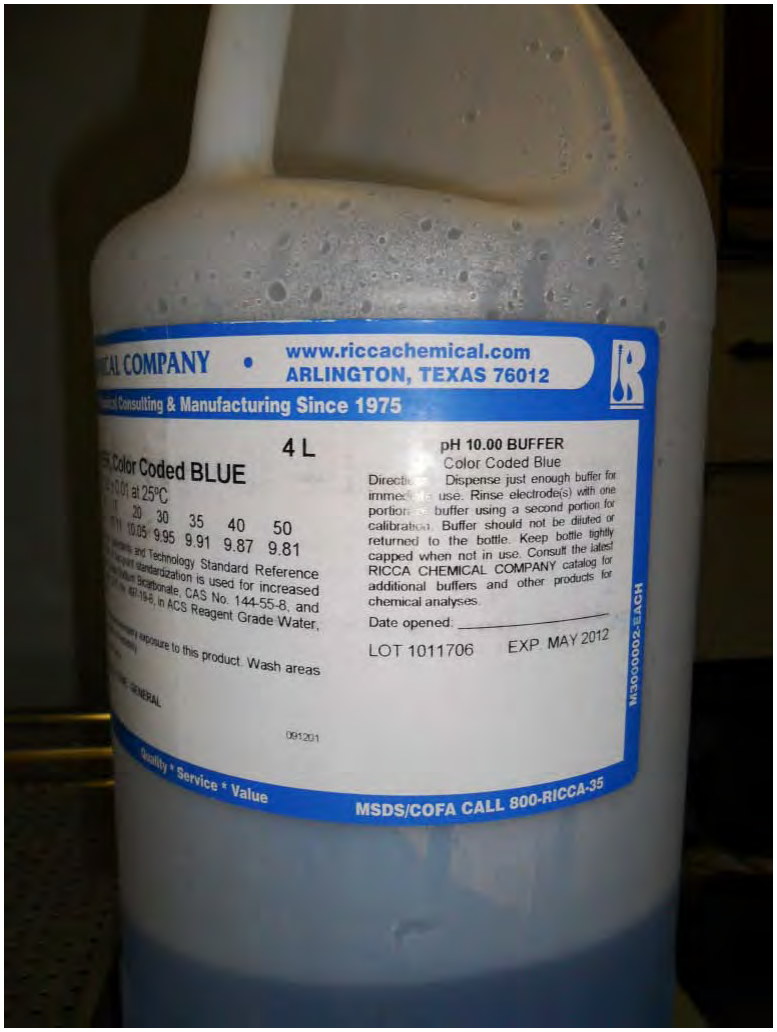
Photograph by David Domingo (EPA) on March 13, 2012 looking at June 27, 2011 correspondence describing the status of facility upgrades.



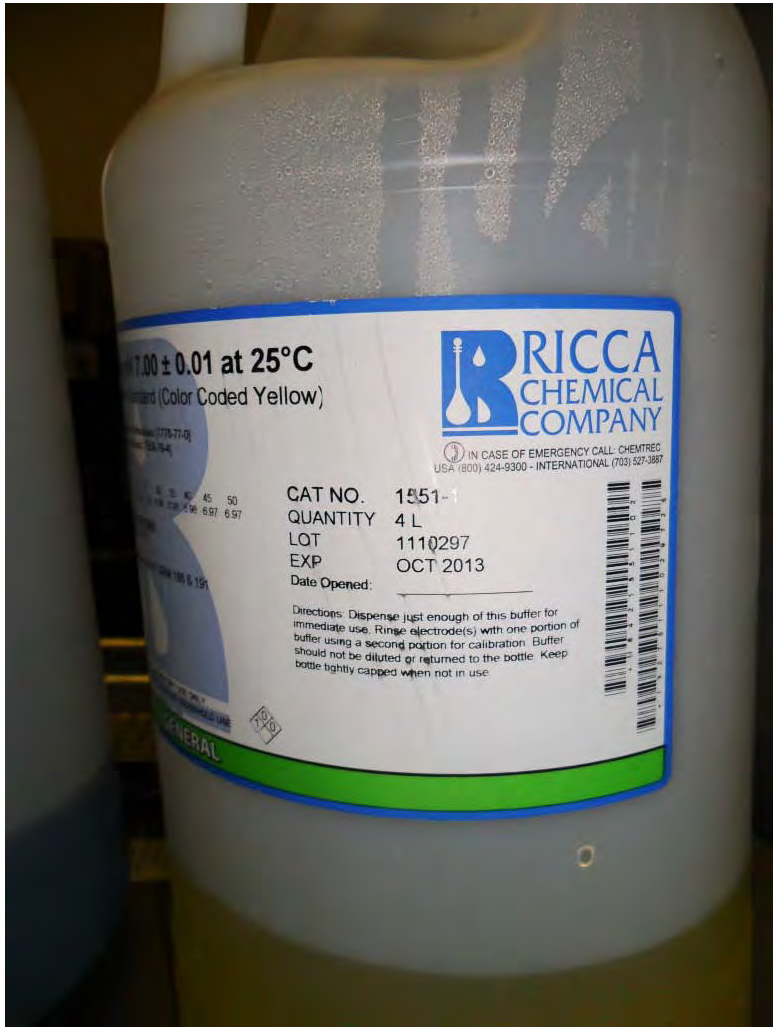
Photograph by David Domingo (EPA) on March 13, 2012 looking at the pH meter for the Facility.



Photograph by David Domingo (EPA) on March 13, 2012 looking at the pH 4.0 buffer used to calibrate the meter. Note the expiration date of December 2012.



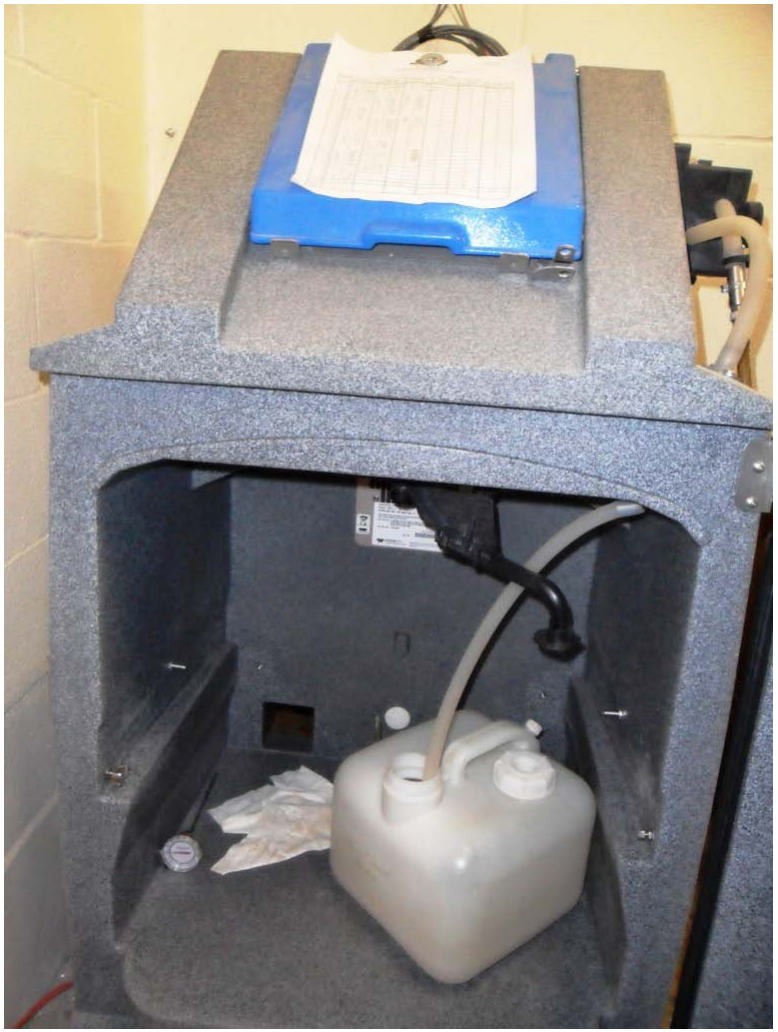
Photograph by David Domingo (EPA) on March 13, 2012 looking at the pH 4.0 buffer used to calibrate the meter. Note the expiration date of May 2012.



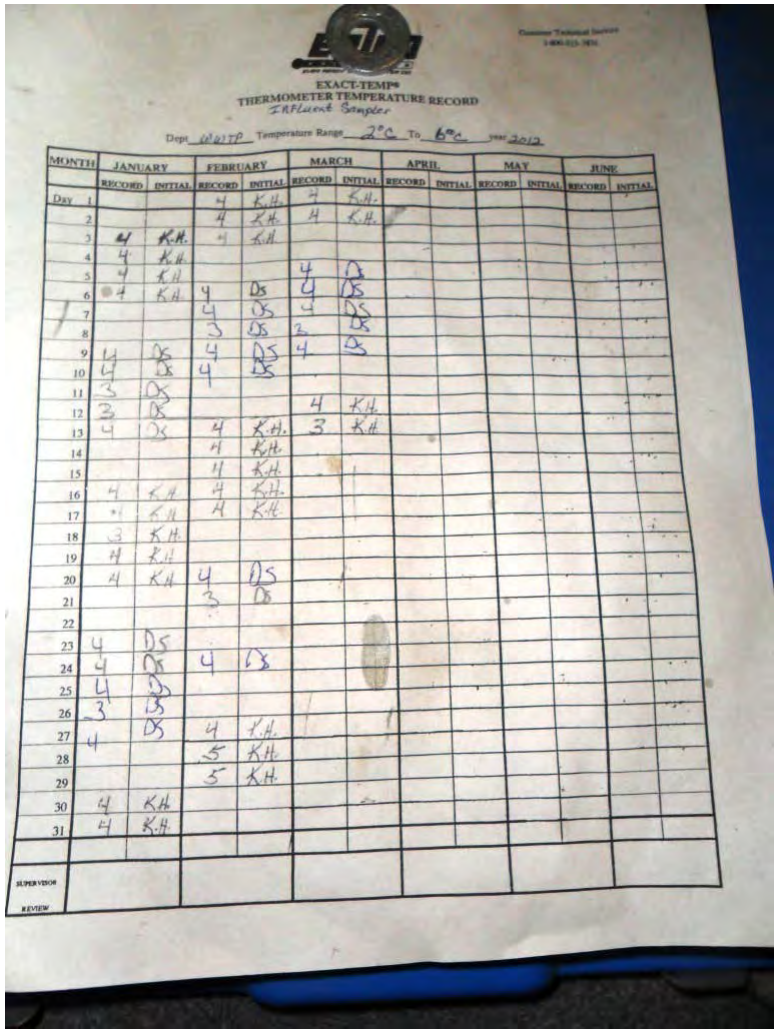
Photograph by David Domingo (EPA) on March 13, 2012 looking at the pH 7.0 buffer used to calibrate the meter. Note the expiration date of October 2013.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the total residual chlorine meter at the Facility.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the new headworks for the Facility. Influent passes through the fine screening unit (location ①) and then an influent composite sample is collected (location ②). The fine screening unit replaces the old comminutor and primary clarifier (see below). Wastewater flows from the headworks to the old comminutor, primary clarifier and then to the aeration basins.



Photograph by David Domingo (EPA) on March 13, 2012 looking at the influent composite sampler. According to Mr. Hill, the City was collecting time-proportioned samples (i.e. ~ 225 ml every hour).

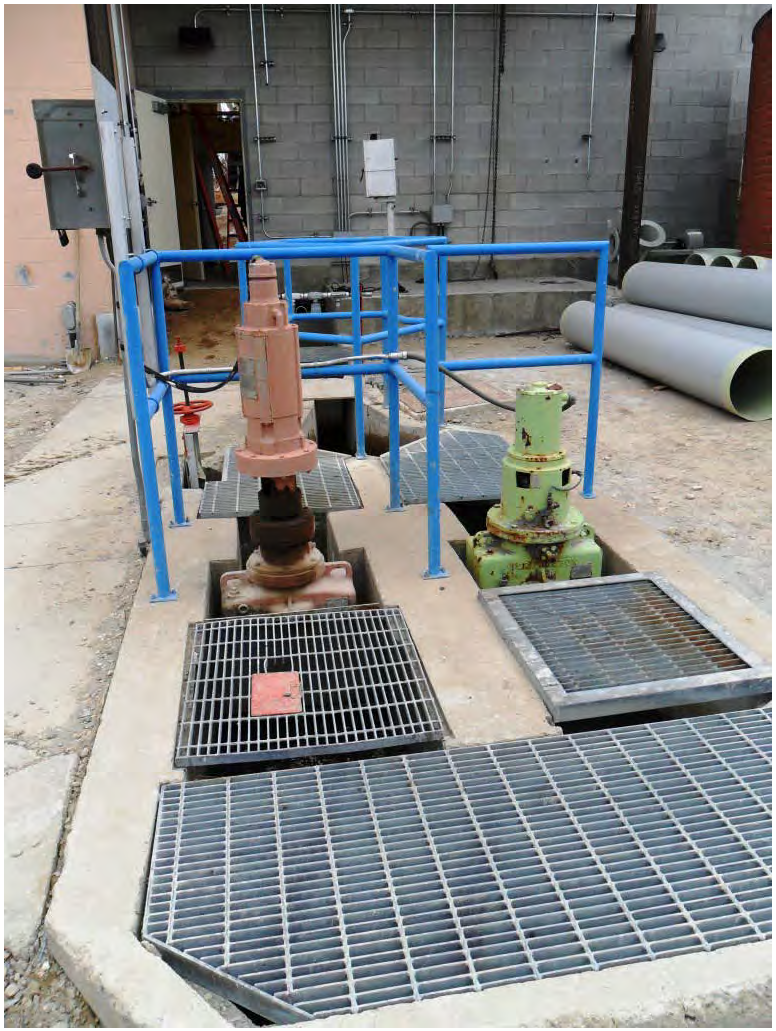


EXACT-TEMP®
THERMOMETER TEMPERATURE RECORD
Influent Sampler

Dept WWTP Temperature Range 2°C To 6°C Year 2012

MONTH	JANUARY		FEBRUARY		MARCH		APRIL		MAY		JUNE	
	RECORD	INITIAL	RECORD	INITIAL	RECORD	INITIAL	RECORD	INITIAL	RECORD	INITIAL	RECORD	INITIAL
Day 1			4	K.H.	4	K.H.						
2			4	K.H.	4	K.H.						
3	4	K.H.	4	K.H.								
4	4	K.H.										
5	4	K.H.			4	DS						
6	4	K.H.	4	DS	4	DS						
7			4	DS	4	DS						
8			3	DS	3	DS						
9	4	DS	4	DS	4	DS						
10	4	DS	4	DS								
11	3	DS										
12	3	DS			4	K.H.						
13	4	DS	4	K.H.	3	K.H.						
14			4	K.H.								
15			4	K.H.								
16	4	K.H.	4	K.H.								
17	4	K.H.	4	K.H.								
18	3	K.H.										
19	4	K.H.										
20	4	K.H.	4	DS								
21			3	DS								
22												
23	4	DS										
24	4	DS	4	DS								
25	4	DS										
26	3	DS										
27	4	DS	4	K.H.								
28			5	K.H.								
29			5	K.H.								
30	4	K.H.										
31	4	K.H.										
SUPERVISOR REVIEW												

Photograph by David Domingo (EPA) on March 13, 2012 looking at the temperature log for the influent composite sampler.



Photograph by David Domingo (EPA) on March 13, 2012 looking at the old comminutor which will be replaced by the fine screening unit. Wastewater flows from the comminutor to the old primary clarifier and then to the aeration basins.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the old primary clarifier which will be replaced by the fine screening unit. Wastewater flows from the old primary clarifier to the aeration basins.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the old ABF wet well. Wastewater flows from the old primary clarifier into the wet well and then to the aeration basins.

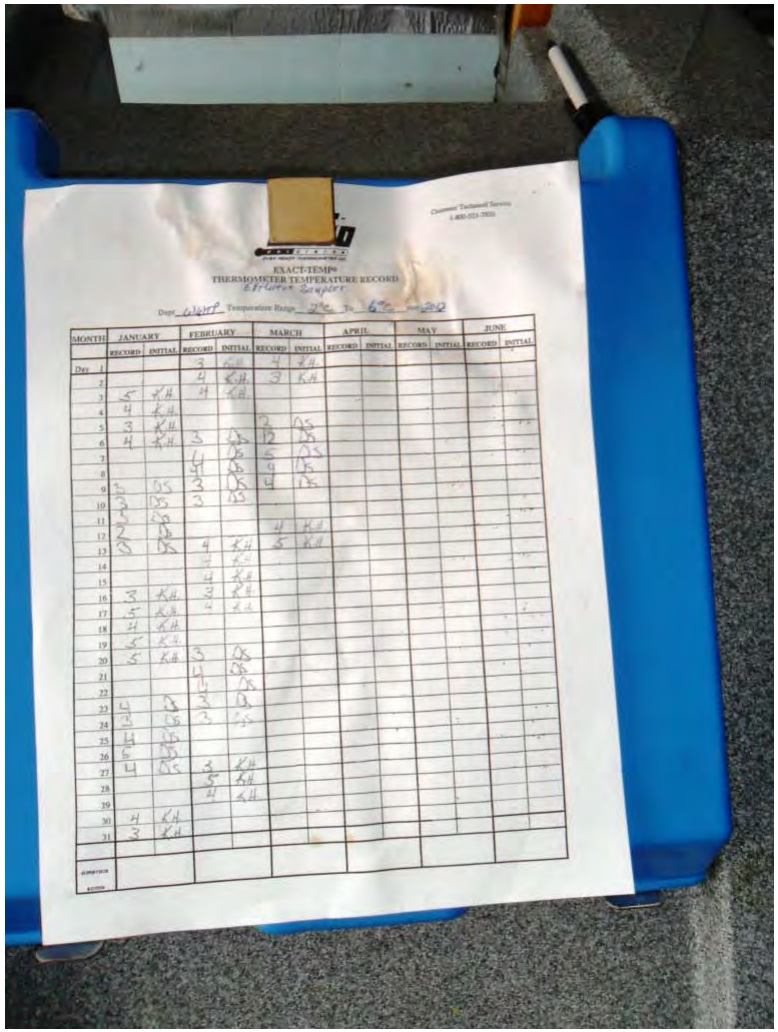
Photograph by David Domingo (EPA) on March 13, 2012 looking at the aeration basins (locations ① and ②). Wastewater flows from the aeration basins to the clarifier tanks (location ③) and then to the chlorine contact basins.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the aeration basins. Wastewater flows from the aeration basins to the clarifier tanks and then to the chlorine contact basins.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the clarifier tanks (locations ① and ②). Wastewater flows from the clarifier tanks to the chlorine contact basins. Solids from the clarifier tanks are treated in the primary and secondary digesters (location ③).

Photograph by David Domingo (EPA) on March 13, 2012 looking at the chlorine contact basins. Wastewater flows from the contact basins through outfall 001 to the Bear River.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the effluent composite sampler. According to Mr. Hill, the City was collecting time-proportioned samples (i.e. ~ 225 ml every hour).



Photograph by David Domingo (EPA) on March 13, 2012 looking at the temperature log for the effluent composite sampler.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the 150 lb chlorine gas cylinders used to disinfect the wastewater. The gas is mixed with water and injected prior to the chlorine contact basin. According to Mr. Hill, the City is aware of the Clean Air Act regulations under Section 112(r) and the threshold quantities for chlorine gas stored onsite. At the time of the inspection, the City maintained only three full cylinders and the remaining cylinders (next photo) are empty.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the empty 150 lb chlorine gas cylinders.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the 150 lb sulfur dioxide gas cylinders used to dechlorinate the wastewater prior to discharge to the Bear River.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the empty 150 lb sulfur dioxide gas cylinders.

Photograph by David Domingo (EPA) on March 13, 2012 looking at the sludge drying beds on the south side of the Facility.

ATTACHMENT C

NPDES 24-hour hotline database

City of Soda Springs, Idaho
Wastewater Treatment Facility

(March 13, 2012 Inspection)

Sector.Value Federal Facility

Permit ID	Facility Name	Date of Call	Time of Call	NonCompliance Date	NonCompliance Type	Violation Description
AK0020648	US Coast Guard - Support Unit Kodiak	2/9/2012	10:27 AM	2/9/2012	**Effluent Limit Violation**	Reporting non-compliance at our WWTP. I should say that the plar permit is now overseen by ADEC but its still in our permit to report t EPA. Exceeded outflow capacity at 1.5 MGD between the hours of 0730 on 2/8 and 0730 on 2/09. We had a flow of 1.8 MGD, slighlty our limit. We are monitoring the situation. Looks like today we will below. Yesterday there was a rain on snow event causing high flow

Sector.Value Muni

Permit ID	Facility Name	Date of Call	Time of Call	NonCompliance Date	NonCompliance Type	Violation Description
ID0020001	City of Salmon WWTP	2/10/2012	9:39 AM	2/10/2012	**Effluent Limit Violation**	Reporting a violation on our Jan 2012 DMR. Violation was on our T % Removal. Permit requirement is 85% and we had 77%. I believe is due to algae in our effluent discharge. We are currently in the planning and design stage of adding an effluent filter to filter our the algae.
ID0020362	City of Elk Riv	2/24/2012	7:31 AM	2/23/2012	**Effluent Limit Violation**	Went over total chlorine residual on 2/23. The result was .35
ID0022845	Santa Fernwo	2/22/2012	10:34 AM	2/22/2012	**Bypass**	Bypass into St. Maries River
ID0028355	City of Kuna W	2/22/2012	7:31 AM	2/21/2012	**CSO/SSO**	Had a SSO last night in one of our local residential neighborhoods.
WA0050229	City of Wapato WWTP	2/17/2012	11:15 AM	2/17/2012	**Effluent Limit Violation**	Reporting non-compliance for our average monthly allowable limit fo effluent ammonia. Our average monthly is at 2.3 mg/l and our perm limit is 1.3 mg/l. This message will be followed up with a 5 day writt letter.
ID0022781	City of Plummer WWTP	2/17/2012	9:48 AM	2/8/2012	**Effluent Limit Violation**	Report a violation we had on 2/8 for E. Coli. We exceeded the max which is 406 and we had a test result of 2420. I just found out from testing lab this morning for the week of Feb 8. Upon looking at it we discoved we had a violation. We were not notified by our lab until th morning. I called and got our test results for the following week of 15th. We do have an E. Coli count of just 3, so we are back in compliance.
ID0020362	City of Elk Riv	2/16/2012	8:56 AM	2/16/2012	**Effluent Limit Violation**	Went over our total chlorine residual on 2/16. The result was 0.50.

ID0021261	City of Idaho Falls WWTP	2/14/2012	1:42 PM	2/14/2012	**Effluent Limit Violation**	On Feb. 14, the City of Idaho Falls lab processed final effluent amm samples collected Feb. 1 through Feb. 10 and the sample qualities Feb1-10 included 10 that were out of compliance with values rangin 8.99 - 11.95. Sample quantities for 6, 8,9,10 were respectively 817, 819, 821, 949 lbs. We will draft a letter and itemize those.
ID0020303	City of Haley WWTP	2/10/2012	5:24 PM	2/10/2012	**Effluent Limit Violation**	High levels of ammonia that were reported to me by our outside lab There will be a note on our DMR. We are trying to continue to aera and keep the ammonia levels down but because of the weather the bacteria in the clarifyers are slow growing. We are hoping our plant come back around in the next couple weeks.
ID0025071	Clarkia Water and Sewer District	2/1/2012	9:15 AM	2/1/2012	**Effluent Limit Violation**	Were in non-compliance as our lab, Anatech from Moscow, ID, calli us yesterday. They told us our E. coli was 547.5. Our max is 426 fo coli. We are assuming the cause was electricty went out. This knocked one of our pumps off. We got it going and then it kept pumping and pumping and pumping overloading our sand filtration. flow was really high and it couldn't keep up. The permit says we ne to write a letter unless you deem we do not have to. We had anoth non-compliance in December. I was just wondering if we need to w a letter for that. I think I put it on our DMR report, what the reason which I will do for this one too.
AK0020648	US Coast Guard - Support Unit Kodiak	2/9/2012	10:27 AM	2/9/2012	**Effluent Limit Violation**	Reporting non-compliance at our WWTP. I should say that the plan permit is now overseen by ADEC but its still in our permit to report t EPA. Exceeded outflow capacity at 1.5 MGD between the hours of 0730 on 2/8 and 0730 on 2/09. We had a flow of 1.8 MGD, slighlty our limit. We are monitoring the situation. Looks like today we will below. Yesterday there was a rain on snow event causing high flow
ID0020362	City of Elk Riv	2/9/2012	8:45 AM	2/8/2012	**Effluent Limit Violation**	We went over our total chlorine residual on 2/8. The result was 0.48
ID0020818	City of Soda Springs WWTP	2/9/2012	8:16 AM	2/8/2012	**Effluent Limit Violation**	Yesterday around 11:50a I got test results from our contract lab. Fo that E. coli count for 2/1 that was 2419 which is over our max daily discharge limit. I went back through records and could not find no r reason this happened. The day before and after came back fine.
AK0021385	Haines WWTF	2/3/2012	10:58 AM	2/3/2012	**Upset**	Failure of our sewer utility. Is part of a major landslide event that ha taken out a sewer main that serves 120 residential households. We have an emergency meeting of the burough assembly this afternoo declare an emergency and requesting state assistance. It has gotte out of our ability to deal with it locally. Facility contact is Brian Lemo 907-766-2257, cell 907-314-0648. All of our public utilities crew are at the site. Conducting temporary repairs to get us through. Believe is discharging sewage underground. Dealing with it as expeditiousl possible.

ID0021261	City of Idaho Falls WWTP	2/2/2012	1:14 PM	2/2/2012	**Effluent Limit Violation**	On 2/2, the Idaho Falls lab processed final effluent ammonia sampl collected 1/24-1/31. Daily permit limit 10/1 - 5/31 is 5.7, 810lbs/d. F the sample qualities there were 8 out ranging from 5.98-8.34. Also, monthly quality and quantity were exceeded with 4.95 and 400 lbs/d permit limit Oct - May is 1.8mg/l and 260 lbs/d.
ID0021261	City of Idaho Falls WWTP	2/1/2012	2:09 PM	2/1/2012	**Effluent Limit Violation**	On 2/1, the Idaho Falls lab processed final effluent ammonia sampl collected 1/14-1/23. Daily permit limit Oct - May is 5.7mg/l, 810 lbd/ 1/17, 18, 19, 23 were respectively 5.98, 6.32, 5.73, 5.98.
ID0022845	Santa Fernwood Sewer Project	2/11/2012	11:35 AM	2/11/2012	**Effluent Limit Violation**	E. coli violation. We were high on our first E. coli but not over our instaneous max. We don't have enough storage space to shut dowr We had rain on snow and the weather forcast is for more of the sar Our INI is up and that is causing most of the problem. The second is 500npn which is over our instantaneous max which makes it less likely that our geo mean will be under or monthly average. We are dealing with cold water and ice in the lagoons. I took a non-chlorina lagoon sample to the lab and it was over 1600. We can't shut dowr as soon as we get some space we will be shutting down. I will be providing a written report.

Sector.Value Oil/Gas

Permit ID	Facility Name	Date of Call	Time of Call	NonCompliance Date	NonCompliance Type	Violation Description
AK0001155	Conoco Phillips Kenai LNG Facility	2/4/2012	7:32 PM	2/4/2012	**Effluent Limit Violation**	Noncompliance with chlorine max daily residual on 2/4 at 0330 that lasted approx 3 min. Back under limit at 0333. I did not see this in EPA permit but saw it in our state permits. Wanted to notify just in
AK0050563	Alyeska Pipeline Service Company	2/17/2012	1:01 PM	2/17/2012	**Effluent Limit Violation**	Pump Station 6, part of the trans alaska pipeline system. The violat was a fecal coliform exceedance from the sewage treatment plant t was in excess of the maximum daily limit. We have done some foll up sampling and it appears we have not yet corrected the situation. have some prelim results from the additional samples that indicate t violation is ongoing. I will be submitting a written report within 14 da as required by the permit with all the relevant information.

Sector.Value Seafood

Permit ID	Facility Name	Date of Call	Time of Call	NonCompliance Date	NonCompliance Type	Violation Description
AKG524053	Seattle Enterprise	2/24/2012	3:03 PM	2/24/2012	**O&M**	Event that occurred on 2/24. It started at 0500 and ended at 1310. motor and gear box failed on port grinder required bypass of grinde and discharge to cutter pump without grinder. Condition is correcte New motor and gear box installed. Failed gear box had 20 hours of runtime exceeding its capabilities. Future policies for inspection, teardown, or replacement at 10,000 hours of service should preven reoccurence from happening.

Sector.Value VGP

Permit ID	Facility Name	Date of Call	Time of Call	NonCompliance Date	NonCompliance Type	Violation Description
N/A	Skagit County Public Works	2/3/2012	10:01 AM		N/A	We own and operate the Guemes Island ferry in Anecortes, WA. I d believe we have a violation but I do have question regarding the ves general permit. We are in a unique situation with our ballast water.

ATTACHMENT D

Status Report

City of Soda Springs, Idaho
Wastewater Treatment Facility

(March 13, 2012 Inspection)

Facility Information	
Permit #	ID0020818
Name	City of Soda Springs
Mayor	Kirk L. Hansen
Mailing Address	9 West 2nd South Soda Springs, Idaho 83276
Facility Address	500 Big Spring Road Soda Spring, ID 83276 (208) 397-4161
Population	3,058
Receiving Water	Bear River
Water Quality Limited Segment [Fact Sheet]	The state of Idaho has listed this segment of the Bear River as limited for nutrients and sediment, which are both pollutants of concern with this discharge.

Previous Letters	• Compliance Order & Information Request May 26, 2011, Deadlines:
	  • December 31, 2011: finish constructing new head works for facility
	  • May 31, 2012: install new UV disinfection at temp location and install temp raw sewage bypass pipe from new primary lift station to existing aeration basins
	  • November 30, 2012: complete construction of new secondary treatment process
	  • April 30, 2013: complete construction of tertiary filtration building
	  • April 30, 2013: a)installation of an emergency power generator, b) upgrades to control building, c)
	  upgrades in existing chlorination building, d) pump replacement in thickener building, e) upgrades to primary digester
	  • December 31, 2013: achieve full compliance with effluent limits in permit
	• NOV November 23, 2004 (Concerning permit compliance schedules)

Efforts	• Letter from City Received via Email November 18, 2010 (October 21, 2010 & September 13, 2010):
	  • Received a categorical exclusion and now is in a position to proceed with engineering, bidding and construction
	  • The hearing for judicial confirmation was held September 1, 2010 before Judge Mitchell brown. He agreed with Soda Springs position and granted the judicial confirmation for the additional $5.3 million to fully fund the project
	• Letter attached to 6/10 DMR from City Received July 12, 2010:
	  • Completed preliminary engineering report to update IDEQ on proposed changes to approved project for upgrading the WWTP
	  • Has retained bond council, approved w/ Judicial confirmation, filed w/ court to proceed w/ hearing in early August 2010, for additional $5.3 million to complete project
	• Letter attached to 5/10 DMR from City Received June 11, 2010:
	  • Completed the second public hearing on funding of WWTP project
	  • City council approved hiring bond council and moving forward with judicial confirmation for $5.3 million for a total project cost of $12.0 million (estimated)
	• Letter attached to 4/10, 3/10, 2/10, 1/10, 12/09, 11/09, 10/09, 9/09, 8/09, 6/09,

	5/09, 4/09, 3/09, 2/09, 1/09, 12/08, 11/08, 10/08, 9/08, 8/08, 8/08, 7/08 DMR from City: • Plant not originally designed to remove ammonia, City has passed a $6.7 million bond to remedy the situation, until then will have limited ammonia success, upgrades on hold till get a new engineering firm • Letter attached to 6/08, 5/08, 4/08, 3/08, 2/08 DMR from City: • Plant not originally designed to remove ammonia, City has passed a $6.7 million bond to remedy the situation, until then will have limited ammonia success, upgrades on hold till get a new engineering firm • Plant upgrades to begin in Summer 2008 • Letter attached to 1/08, 12/07, 11/07, 10/07, 9/07 DMR from City: • Plant not originally designed to remove ammonia, City has passed a $6.7 million bond to remedy the situation, until then will have limited ammonia success, upgrades on hold till get a new engineering firm • Plant upgrades to begin in Spring 2008 • Letter attached to 8/07, 7/07, 6/07, 5/07, 4/07, 3/07 DMR from City: • Plant not originally designed to remove ammonia, City has passed a $6.7 million bond to remedy the situation, until then will have limited ammonia success, upgrades on hold till get a new engineering firm • Plant upgrades to begin in Spring 2007
Permit Review	
Permit Signed	November 16, 2001
Permit Effective	December 21, 2001
Permit Expired	December 21, 2006
Expired?	
Re Application?	Received Application July 5, 2006
New Permit/ Extended?	Administratively Extended
EPA Response to Application	May 4, 2007 Permit continues to be effective
Surface Water Monitoring Reports	
QAP Notification (due 3/21/02)	Received March 28, 2002 [ICIS]
Hauled Waste Notification	(Page 15) **Monitoring of Hauled Waste** 1. Permittee must collect manifests for each load of hauled waste discharged to the POTW. At a minimum, the manifest must include: 1. the name and address of each customer; 2. a statement that the hauled waste being discharged to the POTW is only domestic in nature; and 3. the signature of the waste hauler. 2. Twice per year for three years, permittee must sample one load of hauled waste for the parameters in Table 1 that have a sample frequency of twice per year in accordance with the analytical testing requirements in Table 2. Permittee must submit the analytical results and a copy of the manifest for the hauled waste with the DMR in the month in which the sample collection occurred. This monitoring shall be coordinated with the effluent monitoring for metals.

Due Date	Received
July 10, 2002	September 9, 2002 [ICIS]
May 27, 2003	June 9, 2003 [ICIS]
June 2, 2004	July 13, 2004 [ICIS]

	September 22, 2004	October 12, 2004 [ICIS]

Toxic Reports

Part 1 (Table 1, foot note10) Whole Effluent Toxicity, once per quarter, Sampling may occur only during the year 2005. See Part VI for the definition of quarter.
(Page 11) The permittee must submit the results of the quarterly toxicity tests with the discharge monitoring reports (DMR) for the third month in the quarter (i.e., March, June, September, and December).

Due Date	Received
April 10, 2005	
July 10, 2005	July 11, 2005 [ICIS]
September 10, 2005	
January 10, 2006	

I/I Report (due 6/21/06)

No report submitted [ICIS]
(Page 15)
1. During the effective period of this permit, the permittee must conduct and infiltration/inflow (I/I) study to determine if the low influent concentrations are due to excessive I/I as defined by 40 CFR Part 35.2005(b)(16). The study must provide the total influent flow (wastewater plus I/I) in gallons per capita per day.
2. The permittee must submit the results of this study with their application to renew this permit, 180 days prior to the expiration date of this permit.

DMR Review

DMR Review Date Range	March 2007 – December 2011
Compliance Schedule	The permittee must achieve compliance with the total ammonia effluent limitations of Part I.A for Outfall 001 (Table I-1), by December 31, 2004. Until compliance with the effluent limits is achieved, at a minimum, the permittee must complete the tasks required in Table 3.
Missing DMRs	None
Semi Annual (DMR reporting: Nitrite plus nitrate & phosphorus)	2011: 3/11, 7/11 2010: 4/10, 8/10 2009: 6/09, 9/09 2008: 4/08, 10/08 2007: 6/07, 10/07
Quarterly (DMR reporting: Arsenic, Nickel, Zinc, Cadmium, Lead & Copper)	2011: 3/11, 5/11, 8/11, 10/11 2010: 3/10, 6/10, 9/10, 10/10 2009: 2/09, 6/09, 8/09, 10/09 2008: 2/08, 5/08, 8/08, 10/08 2007: 3/07, 5/07, 8/07, 10/07
DMRs sent late	None

Missing Info & Data Entry Errors

Month	Parameter	Limit	Inputted	
March 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
April 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
May 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
June 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
July 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
August 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
September 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
October 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
November 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum

December 2007	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
January 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
February 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
March 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
April 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
May 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
June 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
July 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
August 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
September 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
October 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
November 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
December 2008	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
January 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
February 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
March 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
April 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
May 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
June 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
July 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
August 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
September 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
October 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
November 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
December 2009	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
January 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
February 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
March 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
April 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
May 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
June 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
July 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
August 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
September 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
October 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
November 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
December 2010	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
January 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
February 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
March 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
April 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
May 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
June 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
July 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
August 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
September 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
October 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum
November 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum

December 2011	Flow (Effluent Gross)	Req. Mon.	N/A	Daily Maximum

DMR violations within permit	**1,596**
Inspection Review	
Inspection Date	June 15, 2009
Inspector	Mary Eileen Hileman
Inspected By	EPA
On Site Representative	Kelly Hill, WWTP Superintendent (208) 547-2609 Alan Skinner, Director of City Services (208) 547-2600
Inspection Commentary	• The QAP did not include information on EnviroChem (no QA/QC, no qualification statements, etc) • No SPCC plan • WWTP does not have an effluent flow meter and uses the influent flow for the effluent flow number • Chain of Custody forms for samples sent to EnviroChem are kept by the lab and not returned to the facility. Without COCs the facility cannot verify when samples were received and sample preservation temperatures upon arrival.

Month	Pollutant	Effluent Limitation	Value Reported in DMR	Limit Type
March 2007	nitrogen, ammonia	30 lb/day	33 lb/day	Monthly Average
March 2007	nitrogen, ammonia	40 lb/day	49 lb/day	Daily Maximum
March 2007	nitrogen, ammonia	2.10 mg/l	3.90 mg/l	Monthly Average
March 2007	nitrogen, ammonia	2.80 mg/l	5.80 mg/l	Daily Maximum
April 2007	nitrogen, ammonia	40 lb/day	58 lb/day	Daily Maximum
April 2007	nitrogen, ammonia	2.10 mg/l	3.30 mg/l	Monthly Average
April 2007	nitrogen, ammonia	2.80 mg/l	7.60 mg/l	Daily Maximum
May 2007	nitrogen, ammonia	2.10 mg/l	3.10 mg/l	Monthly Average
May 2007	nitrogen, ammonia	2.80 mg/l	5.60 mg/l	Daily Maximum
June 2007	nitrogen, ammonia	40 lb/day	51 lb/day	Daily Maximum
June 2007	nitrogen, ammonia	2.10 mg/l	3.20 mg/l	Monthly Average
June 2007	nitrogen, ammonia	2.80 mg/l	6.60 mg/l	Daily Maximum
July 2007	nitrogen, ammonia	2.10 mg/l	3.10 mg/l	Monthly Average
July 2007	nitrogen, ammonia	2.80 mg/l	5.20 mg/l	Daily Maximum
August 2007	nitrogen, ammonia	2.10 mg/l	2.60 mg/l	Monthly Average
August 2007	nitrogen, ammonia	2.80 mg/l	5.0 mg/l	Daily Maximum
September 2007	nitrogen, ammonia	2.10 mg/l	2.30 mg/l	Monthly Average
September 2007	nitrogen, ammonia	2.80 mg/l	4.30 mg/l	Daily Maximum
October 2007	E. coli	406 / 100ml	1,120 / 100ml	Instantaneous Maximum
October 2007	nitrogen, ammonia	2.10 mg/l	2.70 mg/l	Monthly Average
October 2007	nitrogen, ammonia	2.80 mg/l	4.50 mg/l	Daily Maximum

Month	Pollutant	Effluent Limitation	Value Reported in DMR	Limit Type
November 2007	nitrogen, ammonia	2.10 mg/l	2.50 mg/l	Monthly Average
November 2007	nitrogen, ammonia	2.80 mg/l	3.70 mg/l	Daily Maximum
December 2007	nitrogen, ammonia	2.10 mg/l	2.50 mg/l	Monthly Average
December 2007	nitrogen, ammonia	2.80 mg/l	4.80 mg/l	Daily Maximum
January 2008	nitrogen, ammonia	30 lb/day	32 lb/day	Monthly Average
January 2008	nitrogen, ammonia	40 lb/day	50 lb/day	Daily Maximum
January 2008	nitrogen, ammonia	2.10 mg/l	4.80 mg/l	Monthly Average
January 2008	nitrogen, ammonia	2.80 mg/l	7.30 mg/l	Daily Maximum
February 2008	nitrogen, ammonia	40 lb/day	44 lb/day	Daily Maximum
February 2008	nitrogen, ammonia	2.10 mg/l	4.20 mg/l	Monthly Average
February 2008	nitrogen, ammonia	2.80 mg/l	6.20 mg/l	Daily Maximum
March 2008	E. coli	406 / 100ml	866 / 100ml	Instantaneous Maximum
March 2008	nitrogen, ammonia	30 lb/day	33 lb/day	Monthly Average
March 2008	nitrogen, ammonia	2.10 mg/l	4.30 mg/l	Monthly Average
March 2008	nitrogen, ammonia	2.80 mg/l	5.30 mg/l	Daily Maximum
April 2008	nitrogen, ammonia	40 lb/day	45 lb/day	Daily Maximum
April 2008	nitrogen, ammonia	2.10 mg/l	3.70 mg/l	Monthly Average
April 2008	nitrogen, ammonia	2.80 mg/l	6.10 mg/l	Daily Maximum
May 2008	nitrogen, ammonia	2.80 mg/l	3.20 mg/l	Daily Maximum
July 2008	nitrogen, ammonia	40 lb/day	48 lb/day	Daily Maximum
July 2008	nitrogen, ammonia	2.10 mg/l	2.50 mg/l	Monthly Average
July 2008	nitrogen, ammonia	2.80 mg/l	7.40 mg/l	Daily Maximum
August 2008	nitrogen, ammonia	40 lb/day	44 lb/day	Daily Maximum
August 2008	nitrogen, ammonia	2.10 mg/l	3.10 mg/l	Monthly Average
August 2008	nitrogen, ammonia	2.80 mg/l	6.50 mg/l	Daily Maximum
September 2008	nitrogen, ammonia	40 lb/day	51 lb/day	Daily Maximum
September 2008	nitrogen, ammonia	2.10 mg/l	4.40 mg/l	Monthly Average
September 2008	nitrogen, ammonia	2.80 mg/l	7.70 mg/l	Daily Maximum
October 2008	nitrogen, ammonia	40 lb/day	52 lb/day	Daily Maximum
October 2008	nitrogen, ammonia	2.10 mg/l	4.50 mg/l	Monthly Average
October 2008	nitrogen, ammonia	2.80 mg/l	7.90 mg/l	Daily Maximum
November 2008	nitrogen, ammonia	30 lb/day	33 lb/day	Monthly Average
November 2008	nitrogen, ammonia	40 lb/day	58 lb/day	Daily Maximum
November 2008	nitrogen, ammonia	2.10 mg/l	4.90 mg/l	Monthly Average
November 2008	nitrogen, ammonia	2.80 mg/l	8.50 mg/l	Daily Maximum
December 2008	nitrogen, ammonia	30 lb/day	37 lb/day	Monthly Average
December 2008	nitrogen, ammonia	40 lb/day	57 lb/day	Daily Maximum
December 2008	nitrogen, ammonia	2.10 mg/l	5.40 mg/l	Monthly Average
December 2008	nitrogen, ammonia	2.80 mg/l	7.90 mg/l	Daily Maximum
January 2009	nitrogen, ammonia	30 lb/day	47 lb/day	Monthly Average
January 2009	nitrogen, ammonia	40 lb/day	60 lb/day	Daily Maximum

Month	Pollutant	Effluent Limitation	Value Reported in DMR	Limit Type
January 2009	nitrogen, ammonia	2.10 mg/l	6.40 mg/l	Monthly Average
January 2009	nitrogen, ammonia	2.80 mg/l	8.60 mg/l	Daily Maximum
February 2009	nitrogen, ammonia	30 lb/day	39 lb/day	Monthly Average
February 2009	nitrogen, ammonia	40 lb/day	59 lb/day	Daily Maximum
February 2009	nitrogen, ammonia	2.10 mg/l	5.20 mg/l	Monthly Average
February 2009	nitrogen, ammonia	2.80 mg/l	7.90 mg/l	Daily Maximum
March 2009	nitrogen, ammonia	30 lb/day	41 lb/day	Monthly Average
March 2009	nitrogen, ammonia	40 lb/day	69 lb/day	Daily Maximum
March 2009	nitrogen, ammonia	2.10 mg/l	4.50 mg/l	Monthly Average
March 2009	nitrogen, ammonia	2.80 mg/l	6.85 mg/l	Daily Maximum
April 2009	nitrogen, ammonia	30 lb/day	35 lb/day	Monthly Average
April 2009	nitrogen, ammonia	40 lb/day	50 lb/day	Daily Maximum
April 2009	nitrogen, ammonia	2.10 mg/l	3.70 mg/l	Monthly Average
April 2009	nitrogen, ammonia	2.80 mg/l	5.30 mg/l	Daily Maximum
May 2009	nitrogen, ammonia	30 lb/day	35 lb/day	Monthly Average
May 2009	nitrogen, ammonia	40 lb/day	62 lb/day	Daily Maximum
May 2009	nitrogen, ammonia	2.10 mg/l	4.10 mg/l	Monthly Average
May 2009	nitrogen, ammonia	2.80 mg/l	7.80 mg/l	Daily Maximum
June 2009	nitrogen, ammonia	40 lb/day	56 lb/day	Daily Maximum
June 2009	nitrogen, ammonia	2.10 mg/l	2.20 mg/l	Monthly Average
June 2009	nitrogen, ammonia	2.80 mg/l	6.70 mg/l	Daily Maximum
July 2009	E .coli	406 / 100ml	435 / 100ml	Instantaneous Maximum
July 2009	nitrogen, ammonia	40 lb/day	47 lb/day	Daily Maximum
July 2009	nitrogen, ammonia	2.10 mg/l	2.90 mg/l	Monthly Average
July 2009	nitrogen, ammonia	2.80 mg/l	5.80 mg/l	Daily Maximum
August 2009	nitrogen, ammonia	30 lb/day	32 lb/day	Monthly Average
August 2009	nitrogen, ammonia	40 lb/day	56 lb/day	Daily Maximum
August 2009	nitrogen, ammonia	2.10 mg/l	4.40 mg/l	Monthly Average
August 2009	nitrogen, ammonia	2.80 mg/l	7.50 mg/l	Daily Maximum
September 2009	nitrogen, ammonia	30 lb/day	33 lb/day	Monthly Average
September 2009	nitrogen, ammonia	40 lb/day	52 lb/day	Daily Maximum
September 2009	nitrogen, ammonia	2.10 mg/l	4.80 mg/l	Monthly Average
September 2009	nitrogen, ammonia	2.80 mg/l	7.30 mg/l	Daily Maximum
October 2009	nitrogen, ammonia	2.10 mg/l	3.40 mg/l	Monthly Average
October 2009	nitrogen, ammonia	2.80 mg/l	5.20 mg/l	Daily Maximum
November 2009	nitrogen, ammonia	40 lb/day	43 lb/day	Daily Maximum
November 2009	nitrogen, ammonia	2.10 mg/l	2.70 mg/l	Monthly Average
November 2009	nitrogen, ammonia	2.80 mg/l	6.40 mg/l	Daily Maximum
December 2009	nitrogen, ammonia	30 lb/day	38 lb/day	Monthly Average
December 2009	nitrogen, ammonia	40 lb/day	59 lb/day	Daily Maximum
December 2009	nitrogen, ammonia	2.10 mg/l	5.90 mg/l	Monthly Average

Month	Pollutant	Effluent Limitation	Value Reported in DMR	Limit Type
December 2009	nitrogen, ammonia	2.80 mg/l	9.30 mg/l	Daily Maximum
January 2010	nitrogen, ammonia	40 lb/day	48 lb/day	Daily Maximum
January 2010	nitrogen, ammonia	2.10 mg/l	3.70 mg/l	Monthly Average
January 2010	nitrogen, ammonia	2.80 mg/l	7.60 mg/l	Daily Maximum
February 2010	nitrogen, ammonia	2.10 mg/l	4.0 mg/l	Monthly Average
February 2010	nitrogen, ammonia	2.80 mg/l	6.0 mg/l	Daily Maximum
March 2010	nitrogen, ammonia	2.10 mg/l	3.20 mg/l	Monthly Average
March 2010	nitrogen, ammonia	2.80 mg/l	4.60 mg/l	Daily Maximum
April 2010	nitrogen, ammonia	2.10 mg/l	3.20 mg/l	Monthly Average
April 2010	nitrogen, ammonia	2.80 mg/l	4.00 mg/l	Daily Maximum
June 2010	nitrogen, ammonia	2.10 mg/l	2.40 mg/l	Monthly Average
June 2010	nitrogen, ammonia	2.80 mg/l	4.40 mg/l	Daily Maximum
January 2011	nitrogen, ammonia	2.10 mg/l	2.70 mg/l	Monthly Average
January 2011	nitrogen, ammonia	2.80 mg/l	3.50 mg/l	Daily Maximum