



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway, Coeur d'Alene, ID 83814 (208) 769-1422

C. L. "Butch" Otter, Governor
John H. Tippetts, Director

March 2, 2018

Richard Doney, Chairman
Bayview Water and Sewer District
PO Box 637
Bayview, ID 83803
bwsd637@gmail.com

Subject: Bayview Water and Sewer District M-105-04 – 2017 Annual Report Review

Dear Mr. Doney:

The Idaho Department of Environmental Quality (DEQ) has completed the review of the Bayview Water and Sewer District Annual Report for the 2017 growing seasons. The District operates under reuse permit M-105-04. A copy of the report review is attached for your records.

There were numerous permit violations during the 2017 irrigation season and DEQ does not consider the permittee to be in compliance with their reuse permit. DEQ acknowledges there was a sudden change in the operating staff; however, the permittee is still responsible for compliance with their reuse permit. Please review the following comments:

- **Total coliform exceedances** – There was one instance where the permittee failed to monitor during the week of June 4-10, 2017 when irrigation with recycled water took place. All required compliance monitoring must be completed per the permit as specified in Section 5.1.1. The reuse permit requires any non-compliance be reported to DEQ staff within 24 hours of becoming aware of the non-compliance and written notification be completed within five days (See Permit M-105-04, Section 8, p. 21 and IDAPA 58.01.17.500.06).

There was one instance where the single sample limit of 230 MPN/100mL was exceeded; the reported value was >1,600 MPN/100mL on August 22, 2017. This issue was communicated to DEQ staff in an e-mail dated September 7, 2017. Single sample results for total coliform must not exceed 230 MPN/100mL.

There were two instances where the single sample limit was exceeded in 2014 and 2015 and three instances where the five day median permit limit was exceeded in 2015. This appears to be an on-going issue for the permittee and DEQ will require a plan of correction to be submitted detailing actions to be taken by the permittee to investigate and correct this issue. This plan shall include a compliance schedule and any actions to be taken.

- **Recycled water discharge** – There was one instance in which recycled water was discharged from the reuse site. This issue occurred on August 31, 2017. DEQ investigated and visually confirmed the occurrence. The permittee complied with DEQ's request to issue a public notice and the source of the noncompliance, a damaged riser, was repaired. No additional action is required.
- **Missing total nitrogen data** – There was one instance in which the permittee failed to monitor

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recycled water irrigated for total nitrogen in September 2017. The 2017 annual report estimates the total nitrogen loading based on the maximum value observed in 2017 whereas DEQ estimated the total nitrogen loading based on the maximum historical value. In either case, the permittee did not exceed the annual total nitrogen loading rate. The permittee will be required to acknowledge this noncompliance issue in the plan of correction.

- **Incomplete records** – There were seven (7) instances where the permittee failed to record the management unit irrigated with recycled water in the month of August. Operator records show the total volume of recycled water irrigated; however, there is no data indicating which management unit was irrigated. The annual report assumes the total volume was evenly irrigated over the existing management units; however, it would be more conservative to review the hydraulic and constituent loading rates assuming the volumes were applied to each management unit individually. The permittee will be required to acknowledge the non-compliance issue in the plan of correction and submit revised calculations assuming the total volume of recycled water was applied to each management unit. Ensure the volume of water discharged off-site is accounted for when reviewing the calculations for MU-015-06.
- **Static water level** – The permittee failed to record the depth to ground water as measured by the existing piezometers. The 2017 annual report assumes this activity was completed prior to irrigating with recycled water; however, there is no data to verify this statement.

The permittee will be required to prepare a plan of correction to be submitted within 30 days of receiving this annual report review. The plan or correction will need to address and acknowledge each non-compliance issue described above. In addition, the permittee will need to demonstrate to DEQ how these issues will be avoided in the future.

It has come to our attention there have been administrative and operator changes for the Bayview Water and Sewer District; at this time, please review and submit a revised *Form A: Responsible Official/Duly Authorized Representative Designation Form* (attached).

If you have any questions concerning this review or the attached form, please contact me at (208) 666-4611 or e-mail chris.westerman@deq.idaho.gov.

Sincerely,



Chris Westerman, E.I.T.

Enclosed: *Form A: Responsible Official/Duly Authorized Representative Designation Form*

c: Bob Hansen, Water Management Systems, Inc., wsmibob@aol.com
Matthew Plaisted P.E., DEQ Engineering Manager, matthew.plaisted@deq.idaho.gov
Whitney Rowley, DEQ State Office, Boise, whitney.rowley@deq.idaho.gov
Adam Bussan P.E., DEQ State Office, Boise, adam.bussan@deq.idaho.gov
Larry Waters P.E., DEQ State Office, Boise, larry.waters@deq.idaho.gov
File in TRIM: WW Bayview Water & Sewer District - M-105-04, 2013AFL24
(P&S #13600)/2018AGH315