

Recycled Water Reuse Program
Idaho Department of Environmental Quality
Twin Falls Regional Office

City of Bellevue

Municipal Permit M-112-03

2025 Inspection Report

Date Completed: July 15, 2025

Completed by: Nathan Costner, Reuse Permit Writer, State Program Office

Department of Environmental Quality - Reuse Program

Reuse Permit: Inspection Report Form

1 Preliminary Information	
1.1 Inspector	
1.1.1 Name and title	Nathan Costner Reuse Permit Writer
1.1.2 Office (work station)	☐ Technical Services ☐ BRO ☐ CRO ☐ IFRO ☒ State Program Office ☐ LRO ☐ PRO ☐ TFRO
1.1.3 Address	1410 N. Hilton St. Boise, ID 83706
1.1.4 Phone	(208) 373 - 0125
1.2 Inspection Preliminaries	
1.2.1 Inspection type	☒ Announced ☐ Unannounced
1.2.2 Date of inspection	Inspection date: May 14, 2025
1.2.3 Time on / off site:	Time on site: 10:30 AM Time off site: 3:30 PM
1.2.4 DEQ personnel present	Kevin Kruger Twin Falls Reuse Coordinator Todd Higgins Senior Soil Scientist Nathan Costner Reuse Permit Writer
1.2.5 Facility and other personnel present (name(s) and title(s))	Chris Johnson – City of Bellevue Public Works Director, Authorized Representative Bryson Ellsworth – Responsible Charge Operator
1.3 Date of last inspection report and inspector	Date: July 20, 2023 Inspector name: Todd Higgins and Kevin Kruger
1.4 Documents reviewed prior to inspection	☒ Latest inspection report ☐ Latest annual report ☒ Other ☒ Current permit ☐ Latest annual report review ☐ None
1.5 List items that documents review showed need to be followed up upon during inspection	Please see Section 8.3 of this report for a list of follow-up items and their current status.
1.6 Signature of inspector and date	Nathan Costner _____ Date: July 15, 2025

2 Facility Information

2.1 Permittee name	City of Bellevue
2.2 Permit number	M-112-03 (DEQ 2017)
2.3 Permit expiration date	Date: December 13, 2022 Comment: Permitting process ongoing
2.4 Facility type	☒ Slow Rate ☒ Rapid Infiltration ☐ Overland Flow ☐ Aquifer Recharge ☐ Other
2.5 Reuse Water Type	Municipal - ☐ Class A ☐ Class B ☒ Class C ☐ Class D ☐ Class E Industrial - ☐ Potato ☐ Cheese ☐ Sugar Beet ☐ Other:
2.6 Type of operator certification required	☒ Responsible Charge (RC) and Substitute RC Operator ☐ Class I ☒ Class II ☐ Class III ☐ Class IV ☒ Land Application/Reuse Operator ☐ Other certification specified in permit or elsewhere ☐ No certification required ☐ Not known ☐ Not applicable
2.7 Facility Contact Information	
2.7.1 Facility contact (s) (name, title, phone and email)	Bryson Ellsworth Responsible Charge Operator b_ellsworth2@hotmail.com
2.7.2 Responsible Official (name, title, phone and e-mail)	Christina Giordani City of Bellevue Mayor cgiordani@bellevueidaho.us
2.7.3 Authorized Representative (name, title, phone and email)	Chris Johnson City of Bellevue Public Works Director cjohnson@bellevueidaho.us
2.7.4 Facility Address	31 Alyson Road Bellevue, ID 83313
2.7.5 Mailing Address (if different from 2.7.4)	PO Box 825 115 East Pine St. Bellevue, ID 83313
2.8 Regional Office jurisdiction	☐BRO ☐CRO ☐ IFRO ☐ LRO ☐ PRO ☒ TFRO

3 Records Review / Permit Compliance

3.1	Were facility monitoring and permit related records available for review during the inspection?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: DEQ staff reviewed recycled water, groundwater, and soil monitoring records with associated chain of custodies at Bellevue City Hall. Bellevue staff identified their copy of the Quality Assurance Project Plan (QAPP) onsite of the wastewater treatment facility (WWTF) along with some recent carbon copies of analytical chain of custodies.

3.2	Were records organized in a neat and orderly fashion?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: Records were presented in loose stack groups according to the reporting year. Some water department monitoring records were included.

DEQ recommends that Bellevue staff incorporate all reuse-related hardcopy files into a dedicated binder system or electronic filing.

3.3	Were permit compliance activity records and status reviewed as part of this records review?	☒ Yes	☐ No	☐ Not applicable

Comments: DEQ staff discussed each section of Reuse Permit No. M-112-03 (Permit) with Mr. Johnson and Mr. Ellsworth during the records review at City Hall. The letters issued by DEQ on August 25, 2023, February 28, 2025, and April 11, 2025 were also discussed with Mr. Johnson and Mr. Ellsworth to bring the city up to date with the current outstanding items needed by DEQ for a complete reuse renewal application. One of the items identified during the records review, that must be included in compliance activity, CA-112-01, is the proposal of a nitrogen loading limit for the Rapid Infiltration (RI) Basins as required in Section 4.3 of the Permit. This is one of the items of the letters required for a complete reuse renewal application. **Please submit a schedule as part of a corrective action plan as to when the reuse renewal application will be resubmitted to DEQ within 30 days.**

3.4 If permit compliance activity records and status were reviewed, provide a summary of present status.

Comments: Please see Section 3.3.

3.5	Were acts of noncompliance reported as required by the permit?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: Bellevue staff has reported total coliform exceedances during the current growing season as they become aware of the results from Magic Valley Labs in Twin Falls, Idaho via phone and 5-day follow-up by email to the Regional Reuse Coordinator, Kevin Kruger.

3.6	Did the permittee comply with Standard Permit Conditions for Procedures and Reporting? List items reviewed and summarize in the comments section.	☐ Yes	☒ No	☐ Not observed	☐ Not applicable

Comments: Bellevue staff has reported noncompliance events for total coliform exceedances but has not submitted the 2024 annual report at the time of inspection as required by Section 6 of the Permit. The annual report must include a summary of all noncompliance events occurring during the reporting year including the steps taken to reduce or eliminate the reoccurrence of the noncompliance (DEQ 2017, Section 6 and Section 8).

3.7 Which of the following are required to be monitored in the permit?	☐Wastewater chemistry ☒ Recycled water loading ☒Recycled water chemistry ☐Backflow testing ☒Ground water chemistry ☒ Soil chemistry ☐Irrigation water chemistry ☒ Irrig water loading ☒Plant tissue chem ☒ Crop uptake ☒ Crop yield ☐Flow meter calibration ☐ Other ☐ None
Comments: Monitoring requirements are documented in DEQ 2017 Section 5, pp. 15 – 18.	
3.8 What type of monitoring record review was conducted during the inspection?	☒ Spot check ☐ Detailed review ☐ Not reviewed
Comments: Records were spot checked at City Hall prior to the WWTF inspection with a physical QAPP copy identified at the WWTF. Recycled water, groundwater, and soil monitoring records were reviewed and discussed.	
3.9 For the type of records review conducted, was monitoring conducted substantially as required in the permit?	☒ Yes ☐ No ☐ Not observed ☐ Not applicable
Comments: Monitoring was conducted in accordance with the Permit during the current reporting year, however DEQ identified inconsistency between the approved QAPP's analytical method for total coliform (SM9221B) and contract laboratory analytical reports (SM9222B). Both methods are EPA approved, however the SM9222B is not listed in the facility's QAPP. Please determine which method is best suited for the city as well as for the lab and stick to that method such that data can be consistently and accurately compared between sampling events. DEQ discussed with the permittee the reference tables Table 3 and Table 5 and Section 1.5.1 of the facility's QAPP the directed duplicate sampling and relative percent difference evaluation that should be identified in the annual report. **DEQ recommends that Bellevue staff discuss their QAPP method requirements with the contracted laboratory, update the QAPP method references, and place the requested method alongside the analysis on the chain of custody.**	
3.10 Were the records reviewed current?	☒ Yes ☐ No ☐ Not observed ☐ Not applicable
Comments: Records were presented by the facility from 2025 back to 2023. The current reporting year was reviewed for compliance with the Permit.	
3.11 Did records review indicate compliance with permit limits and requirements?	☒ Yes ☐ No ☐ Not observed ☐ Not applicable
Comments: Records were verified by DEQ and shown to be maintained by the facility for the current reporting year.	

4 Sampling and Laboratory Facilities

4.1 Who collects and handles the permit required sampling?

Media Sampled	Sample Collector/Handler
Ground water	Bryson Ellsworth Nathan Ward
Wastewater	
Recycled water/irrigation	
Soils	
Plant tissue	
Other	

4.2 Has the facility implemented a Quality Assurance Project Plan (QAPP) covering monitoring and reporting required by the reuse permit?	☒ Yes ☐ No ☐ Not observed ☐ Not applicable
Comments: Bellevue submitted the QAPP for DEQ review on 11/30/2021. DEQ review is pending.	
4.3 Are staff involved with monitoring and reporting, including in-house laboratory personnel trained in implementing the QAPP?	☒ Yes ☐ No ☐ Not observed ☐ Not applicable
Comments: Mr. Ellsworth identified the facility QAPP onsite of the WWTF. DEQ staff verbally noted that the document appeared to be evaluated often by Bellevue staff.	
4.4 What laboratory facilities are utilized for analytical work required in the permit? If a commercial lab is used, provide the name of the lab in the comment section below.	☒ Commercial lab ☐ In-house facility lab ☐ Not observed
Comments: Magic Valley Labs in Twin Falls, ID is used for analytical work.	
4.5 Has the In-House laboratory implemented a Quality Assurance Performance Plan (QAPP) covering laboratory procedures?	☐ Yes ☐ No ☐ Not observed ☒ Not applicable
Comments: Not applicable at this time.	
4.6 Does the in-house laboratory appear to be maintained in a professional manner?	☐ Yes ☐ No ☐ Not observed ☒ Not applicable
Comments: Please see Section 4.5.	

5 Wastewater Treatment Processes

5.1	Are primary and secondary wastewater treatment facilities maintained and in good repair?	☐ Yes	☒ No	☐ Not observed	☐ Not applicable

Comments: The WWTF is under active construction with considerable piping and electrical work to be completed following a process failure that flooded the facilities lower gallery in 2023. Gas monitoring equipment was fixed to the wall above the bioreactor trains but was not in service at the time of inspection (Photograph 2). The bioreactor trains for the MBR plant were not in operation at the time of inspection. Mr. Ellsworth noted that the stagnant water in the bioreactor trains was from precipitation. There was some trash observed by DEQ staff at the bottom of the basins. The concrete integrity of the basins appeared to be in good condition. Bellevue staff identified hydrogen sulfide corrosion under the headworks floor grating (Photograph 3) and noted the limited ventilation of the room fanning air into a generator outside the room. Bellevue staff noted that their plan was to restore the concrete of the basin and reline it to prevent corrosion in the future. DEQ staff noted that there was less moss growth on the headworks Bandscreen Monster grit screening system than the previous inspection in 2023 and overall odors in and around the building were minimal (Photograph 4).

Please submit a work plan as part of a corrective action plan within 30 days to DEQ outlining the items needed to return the MBR plant to operation as designed.

5.2	Are recycled water storage lagoons maintained and in good repair?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: The lagoons (LG-112-01, LG-112-02, LG-112-03) all appear to be in working order (Photographs 8, 9, and 12-16). The WWTF lagoons have common designations identified by Section 5.5 in the Permit as follows: LG-112-01 = Cell A, LG-112-02 = Cell B, LG-112-03 = Cell C.

Aeration was occurring on Cell A at the time of inspection. Weed management is occurring as needed without any areas needing specific attention. The exposed liners of the lagoons (Cells A and C) appear to be in good condition. The condition of the liner for Cell B was not verified or visible during the inspection with an even distribution of weed growth covering the liner freeboard (Photographs 12 and 13).

At the time of inspection, DEQ has not received records to indicate lagoon seepage testing for LG-112-01 and LG-112-02 occurred in compliance with IDAPA 58.01.16.493.02.c and compliance activity, CA-112-03 of the Permit.

5.3	Are water and/or wastewater conveyance structures maintained and in good repair?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: The conveyance structures appear to be maintained as appropriate with the exception of a bent gate valve at the Cell B splitter box (Photograph 16). The irrigation pump station and vault where recycled and supplemental irrigation water (SIW) can be combined was appropriately maintained with minimal weed growth and pump component accessibility (Photograph 17).

5.4	Are pumps, flow meters, disinfection, and other related equipment maintained and in good repair?	☐ Yes	☒ No	☐ Not observed	☐ Not applicable

Comments: Bellevue staff identified the chlorine gas metering equipment onsite (in good working condition with two cylinders on the scales; Photograph 10 and Photograph 11). It was observed during the inspection and identified by Mr. Ellsworth that the chlorine header equipment had been replaced due to equipment failure and spare parts were now on the shelf inventory.

Multiple 5-gallon hole-drilled buckets were floating in lagoon Cell C containing (up to 10) sodium hypochlorite tablets to assist in disinfection (Photographs 14 and 15).

5.5	For flow metering, describe flow meters used, and what they measure.			
Comments: The facility uses Endress Hauser (Promag W model) electromagnetic flow meters to measure recycled water and SIW discharges to the management units (Photograph 6, 7 and 20).				
5.6	Has the permittee complied with the expansion, production increase, modification condition of the permit?	☐ Yes	☒ No	☐ Not observed ☐ Not applicable
Comments: The facility is under active construction and repair to restore the MBR system to an as designed state. Bellevue staff identified the scheduled piping, equipment relocation, and electrical repairs needed to operate the facility as designed. Bellevue staff discussed a Closure Plan for MU-112-06 (Field 2) with DEQ staff in June of 2023. DEQ has not received an approvable Closure Plan for Field 2 at the time of the inspection.				
5.7	Is the facility in compliance with operator certification requirements and are the treatment and collection system classifications current?	☐ Yes	☒ No	☐ Not observed ☐ Not applicable

Comments: The 2023 inspection report identified Bellevue's licensing need for a Wastewater Land Application License (DEQ 2023a). This requirement, as per IDAPA 58.01.16.203.07, is currently satisfied. IDAPA 58.01.16.203 in the "Wastewater Rules" addresses the requirement of a licensed responsible charge operator and a licensed substitute responsible charge operator for Public WWTF. At the time of the inspection the facility did not have a licensed substitute responsible charge operator. There was discussion during the inspection of Mr. Johnson, Public Works Director, obtaining his Class II Wastewater Treatment License and Wastewater Land Application License. **Please provide information in a corrective action plan as to the direction the facility is taking in either Mr. Johnson obtaining his licensure or the hiring of a responsible charge and substitute responsible charge operator to maintain compliance with the Permit.**

Treatment system classification:
Wastewater Collection system classification II
Wastewater Treatment system classification II

Operator Name	Type	License Number	Expiration Date
Bryson Ellsworth	Wastewater Treatment Operator Class IV License	WWT4-25143	4/6/2026
Bryson Ellsworth	Wastewater Land Application License	WWTLA-26206	4/6/2026
Bryson Ellsworth	Wastewater Collections Operator Class III License	WWC3-25620	4/6/2026

6 Recycled Water Land Treatment / Application

		Yes	No	Not observed	Not applicable
6.1	Are hydraulic management units as described in the permit?	☒	☐	☐	☐

Comments: The facility land applies recycled water to three rapid infiltration basins (RIB), management units MU-112-02 (RIB 2), MU-112-03 (RIB 3), and MU-112-04 (RIB 4) (Photograph 26) historically during the non-growing season. However, with the MBR system not currently in operation, these management units (RI Basins) have been the primary beneficial use for land application of recycled water for the last two years. The facility is actively working to repair the MBR system such that land application can be restored to management unit, MU-112-05 (Field 1) during the growing season. Field 2 is currently for sale by the owner and is no longer being used for land application. However, the management unit is still being soil sampled, as reported by Mr. Ellsworth. At the time of the inspection, DEQ staff have not received an approvable Closure Plan for Field 2. This is a requirement for a complete reuse renewal application.

		Yes	No	Not observed	Not applicable
6.2	Are only permitted sites being used for recycled water land application?	☒	☐	☐	☐

Comments: The facility gave no indication that management units were being used outside of the Permit.

		Yes	No	Not observed	Not applicable
6.3	Are irrigation systems on hydraulic management units as described in the permit and/or in application materials?	☒	☐	☐	☐

Comments: No comment.

		Yes	No	Not observed	Not applicable
6.4	Are irrigation systems maintained and in good repair?	☒	☐	☐	☐

Comments: The center pivot system for Field 1 and Field 2 are currently only land applying SIW and were visually inspected from a distance noting an even distribution. There did not appear to be any dry spots in the field associated with an uneven sprinkler flow distribution or broken sprinkler heads. Photographs 22 – 24 depict the field conditions with the center pivot in the distance. It appears the bottoms of the RI Basins have a slope which affects the uniform filling and infiltration of recycled water (Photograph 26). DEQ 2023b recommended this be addressed with permit renewal.

		Yes	No	Not observed	Not applicable
6.5	Are irrigation conveyance structures (main lines, ditches, etc.) maintained and in good repair?	☐	☒	☐	☐

Comments: Most of the conveyance structures are buried and not visible for inspection. The pump vault and dragon filters appeared to be in good repair (Photograph 17). DEQ staff did not enter the management units (Field 1 and Field 2) with the irrigation system operating. The effluent discharge pipe rim to RIB 4 contained cracks potentially affecting even distribution. Mr. Ellsworth noted that it is difficult to sample from the effluent discharge pipe rim of RIB 4 and speculated about whether or not it was the reason for the total coliform exceedances. The discharge piping for the other RI Basins appeared to be in good repair.

Please submit a work plan as part of a corrective action plan within 30 days to DEQ outlining a schedule to demonstrate even distribution of recycled water to the RI Basins and ensure sampling can be performed without contamination. This is also a requirement for the submittal of a complete reuse renewal application.

6.6	Do management units appear well managed hydraulically? (e.g. no ponding, crop death, etc.)	☐ Yes	☒ No	☐ Not observed	☐ Not applicable

Comments: At the time of inspection, there did not appear to be any ponding or dry spots (crop death) observed in Field 1 or Field 2 that would indicate an uneven sprinkler flow distribution. The crops appeared to be a healthy coloration. Photographs 22 – 24 depict the field conditions with the center pivots in the distance. However, it was noted by Mr. Ellsworth that a section of the center pivot from Field 2 enters RIB 3 at the southeastern corner and exits RIB 2 in the southern section of the RI Basin, spraying SIW onto the RI Basins and partially filling them up (Photographs 27 and Photograph 28). This is a concern to DEQ because the RI Basins are required to have a drying time of 4 to 5 days as stated in the facility's Plan of Operation (PO) prior to land application of recycled water. There is also concern that the repeated use of the center pivot will deform the berm of the RI Basins allowing both run-on and run-off. RIB 4 was missed by the center pivot in Field 2 and appeared to contain an appropriate amount ponding considering this was the RI Basin that was currently receiving recycled water at the time of the inspection.

6.7	Does it appear that applied recycled water is being retained on fields and not discharging to surface water?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: DEQ staff did not observe the center pivot passing through RIB 2 and RIB 3 from Field 2 but there are concerns regarding maintaining berm integrity and drying times of the RI Basins. There is concern that the repeated use of the center pivot will deform the berm of the RI Basins allowing both run-on and run-off.

Bellevue staff did note that Field 2 is not being used for land application of recycled water. The landowner has made it quite clear that Field 2 is for sale. DEQ staff discussed with Mr. Ellsworth that the center pivot from Field 2 entering the RI Basins was of concern. DEQ discussed with the city the possibility of the contract farmer turning off the SIW in that area such that the city can achieve their drying times. Mr. Ellsworth noted that turning off the SIW in that area was something that the contract farmer did have control over.

The permittee must submit a schedule in a corrective action plan within 30 days addressing the items above when the center pivot from Field 2 enters the RI Basins.

6.8	Does it appear that the approved runoff management plan is being followed (if applicable)?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: There was no observed recycled water runoff and ponding of the site due to overirrigation. DEQ expressed concern for the tire track entering the RIB's going over a set of boards on the border of RIB 2 and 3 that would compact the berm over time decreasing the efficiency of the design and allowing runoff between the basins.

6.9	Are monitoring wells maintained and in good repair?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: DEQ staff visually inspected GW-112-02 on the southside of the WWTF shop (Photograph 29). The well casing and inside components were in neat condition with a lock. DEQ staff recommended placing a cap on the end of the inside piping to prevent bugs or mice from entering the well and potentially causing contamination.

6.10	Are waste solids management facilities operated in accordance with an approved waste solids / sludge management plan or otherwise in compliance with the permit?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: The facility hauls waste solids/sludge to the Ohio Gulch Transfer Station for disposal at the Blaine County Landfill (Keller 2021).

7 Management: Recycled Water Land Treatment / Application

7.1	Are nuisance conditions associated with the reuse system (vector attraction, odors, spray drift) being adequately controlled?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: Bellevue staff identified that there are odor complaints from some in the community. DEQ staff discussed odors with Bellevue staff noting that odors were minimal throughout the facility and surrounding WWTF. The active odor control product (OxyPro) is stored in totes in the WWTF which is used to treat upstream odors in the collection system (Photograph 1).

7.2	Does the facility have an approved odor management plan?	☐ Yes	☒ No	☐ Not observed	☐ Not applicable

Comments: The facility does not have an odor management plan in their PO.

7.3	Has the facility received odor complaints since the 2022 inspection? Describe the cause, corrective actions taken, and if the approved odor management plan was implemented (if applicable).	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: Bellevue staff verbally relayed to DEQ staff of community odor complaints which they noted are investigated within a 24-hour period to the extent possible. Bellevue staff identified a chemical product (Photograph 1) that is applied upstream of the WWTF to assist with odor control.

DEQ staff noted that odors were minimal while onsite when entering the WWTF, lagoons, and RIBs.

7.4	Are permit required buffer zones between recycled water land application areas and dwellings, public access areas, surface waters, wellheads, etc. being adhered to in accordance with permit conditions?	☐ Yes	☒ No	☐ Not observed	☐ Not applicable

Comments: Please see Section 6.7.

7.5	Is fencing and signage around wastewater treatment facilities and land treatment areas in accordance with permit conditions?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: Fencing and signage is appropriate (Photographs 19).

7.6	Are hydraulic management units cropped as required in the permit? If so, describe crops grown.	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: Alfalfa is planted on Field 1 and Field 2 (Photographs 22 through 24).

7.7	Do crops appear to be healthy and appropriately managed?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable

Comments: Crops appear healthy and appropriately managed. There were no visible signs of crop death in Field 1 and Field 2 (Photographs 22 through 24).

7.8	Does it appear that weeds are being adequately controlled at the facility (e.g. lagoon and land application areas)?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable
Comments: There was minimal spring weed growth, but overall the surrounding lagoons, berms, and RIBs were in good condition.					
7.9	Do domestic animals graze on site? If yes, what types of animals are being grazed?	☐ Yes	☐ No	☐ Not observed	☒ Not applicable
Comments: The Permit does not allow grazing without an approved grazing management plan.					
7.10	Does the facility have an approved grazing management plan?	☐ Yes	☐ No	☐ Not observed	☒ Not applicable
Comments: Please see Section 7.9.					
7.11	Does it appear that grazing has been managed such that soil compaction due to grazing animals on hydraulic management units has been prevented?	☐ Yes	☐ No	☐ Not observed	☒ Not applicable
Comments: Please see Section 7.9.					

8 Inspection Debriefing

8.1	Has the permittee provided access to DEQ personnel according to permit conditions?	☒ Yes	☐ No	☐ Not applicable	
Comments: Bellevue staff were accommodating to DEQ staff with questions, review documents, and accessibility of the WWTF.					
8.2	Does it appear that there are adequate facility personnel to manage permitted facilities and support regulatory mandates as specified in the permit?	☒ Yes	☐ No	☐ Not observed	☐ Not applicable
Comments: The facility is under active construction and management is actively working to get the facility operational with upgrades and staffing.					

8.3	If there are follow-up items from a previous inspection (including those listed in Item 1.5 above), describe these items and their current status in the Comments Section below.

Comments: (DEQ 2022).

1. Analytical method SM9223B is being used for total coliform analysis. The EPA has approved this method for E.coli analysis only. Please work with your analytical lab to identify an EPA total coliform analytical method suitable for the facility's needs (Section 3.9).

   Status: Methods were discussed with Bellevue about conversing with the contracted lab for the needs of the QAPP (including giving them a copy), inclusion of the method in the Chain of Custody, or updating the method in the QAPP. The analytical laboratory will be able to determine what accredited methods are able to be performed for compliance.

2. Preventive maintenance of the treatment plant has been neglected resulting in corroded fixtures and leaking pipes. New facility management has contracted a consultant to inspect and report on all repairs and modifications required to return the facility to a good state of repair. Please provide DEQ with regular updates on the consultant's recommendations and the ongoing status of repairs. Please ensure the annual reports include a complete discussion of these issues until all repairs are completed. (Section 5.1).

   Status: Construction and preventative maintenance of the site were ongoing during the inspection.

3. The permit requires a Wastewater Treatment Operator – Land Application license for the operator. Please work on obtaining this licensure as soon as possible (Section 5.7).

   Status: **Complete** Bryson Ellsworth, the RCO, has obtained this licensure.

8.4 Describe major issues raised and recommendations made during this inspection which were discussed with the facility during de-briefing, in the comment section below. If there are any other issues or recommendations that also need to be addressed, please list those separately.

Comments:

1. DEQ recommends that Bellevue incorporate all reuse-related hardcopy files into a dedicated binder or electronic filing system (Section 3.2).

2. DEQ recommends that Bellevue staff discuss their QAPP total coliform method requirements with the contracted laboratory, update the QAPP total coliform method references, or place the requested method alongside the analysis on the chain of custody. It is the responsibility of the Quality Assurance Officer to ensure that quality data is obtained as required by the Permit (Section 3.9).

3. The permittee must submit a corrective action plan to DEQ for review within 30 days providing the following:

    - The permittee must provide a schedule for when the reuse permit renewal application will be resubmitted addressing the items covered in the August 25, 2023, February 28, 2025, and April 11, 2025 letters, particularly identifying a nitrogen loading limit for the RI Basins as required by Section 4.3 of the Permit (Section 3.3).

    - The permittee must provide a work plan outlining the items needed to return the MBR plant to operation as designed as required in Section 8 of the Permit (Section 5.1).

    - The permittee must provide a schedule for when the city plans to seepage test LG-112-01 and LG-112-02 as required by compliance activity, CA-112-03 of the Permit (Section 5.2).

    - The permittee must provide a schedule for ensuring that even distribution can be maintained across the RI Basins and total coliform sampling can be performed without contamination as required in IDAPA 58.01.17.606.c "Recycled Water Rules" (Section 6.5).

    - The permittee must submit a schedule for addressing the center pivot from Field 2 entering the RI Basins (Section 6.7).

    - The permittee must provide a schedule and or plan for either Mr. Johnson obtaining his Class II Wastewater Treatment License and Wastewater Land Application License or the hiring of a responsible and substitute responsible charge operator as required by IDAPA 58.01.16.204 "Wastewater Rules" (Section 5.7).

8.5 References:

Idaho Department of Environmental Quality (DEQ). 2017. Idaho Department of Environmental Quality Reuse Permit M-112-03. (DEQ 2017).

Idaho Department of Environmental Quality (DEQ). 2023. City of Bellevue M-112-03 2022 Inspection Report. (DEQ 2023a).

Idaho Department of Environmental Quality (DEQ). 2023. City of Bellevue M-112-03 2023 RIB Inspection Report. (DEQ 2023b).

Keller Associates (Keller) 2021. *City of Bellevue Plan of Operations*. (Keller 2021).

Idaho Bureau of Occupational Licenses (IBOL). Public Record Registration and License Search. Accessed May 22, 2025. https://edopl.idaho.gov/OnlineServices/_/#1



Photo 1:OxyPro totes in the WWTF used to treat upstream odors in the collection system



Photo 2: Hydrogen Sulfide monitoring system (not currently operational) on southern edge of WWTF building above basins



Photo 3: Concrete deterioration from Hydrogen Sulfide in headworks below the grated path.



Photo 4: Headworks Bandscreen Monster grit screening system

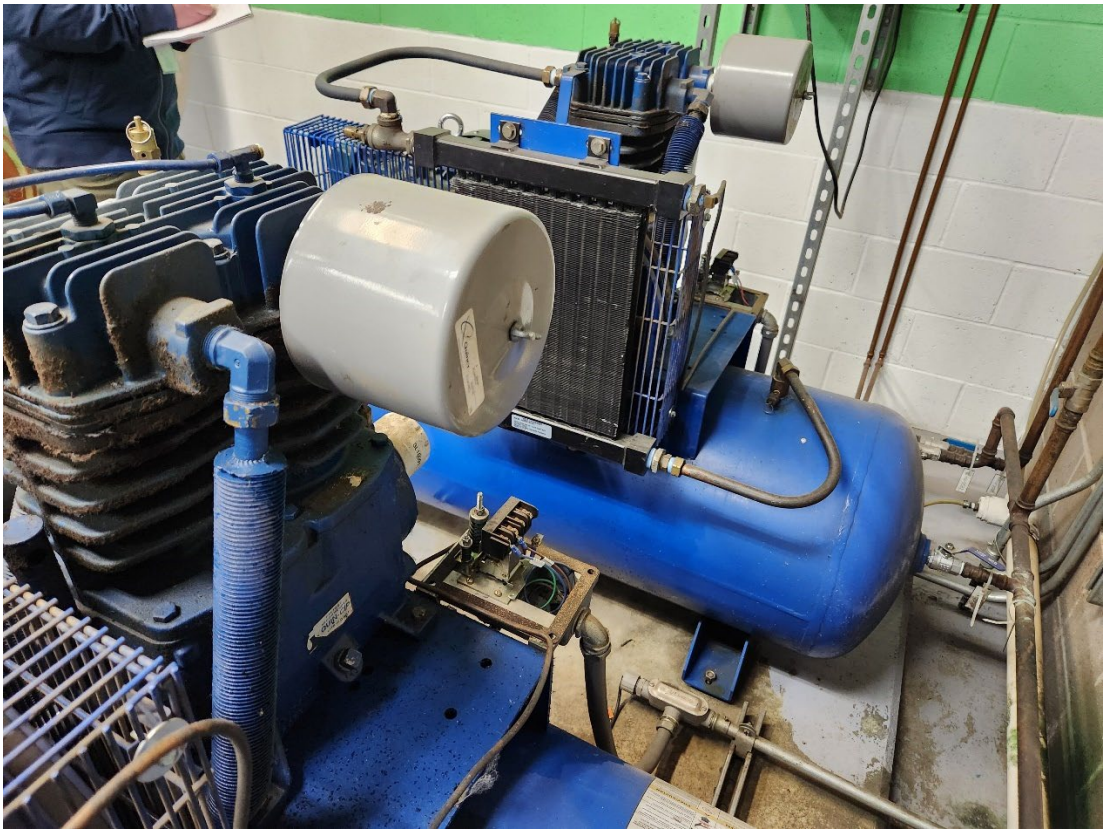

Photo 5: Quincy air compressors



Photo 6: New Endress Hauser (Promag W model) electromagnetic flow meter ready for replacement.

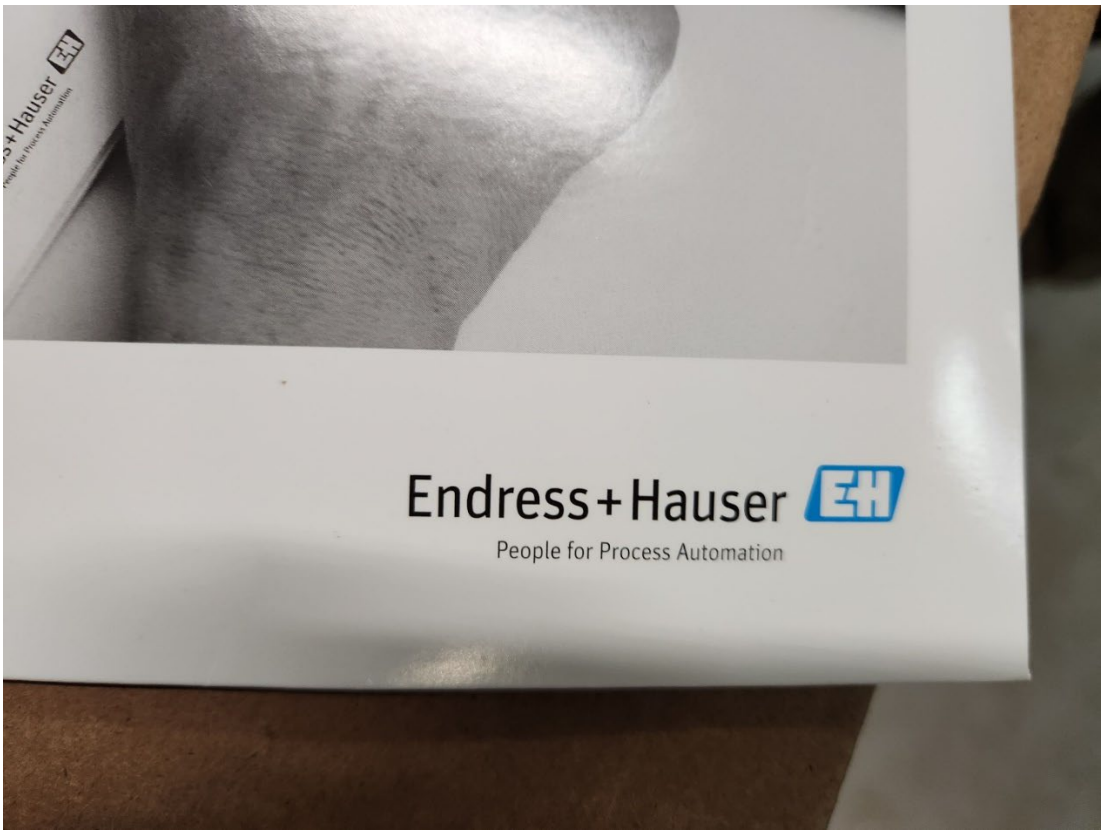

Photo 7: New Endress Hauser flow meter documentation pamphlet



Photo 8: Looking East at Cell A (LG-112-01) towards the WWTF. The liner was in good condition.



Photo 9: Looking South at Cell A (LG-112-01). Aeration equipment was in operation during inspection. Liner was in good condition.



Photo 10: Regal smart-valve chlorinator and electronic scale



Photo 11: Chlorine gas cylinders (two in operation on scale) with metering



Photo 12: Looking Southeast between Cell B (LG-112-02) and Cell C (LG-112-03) lagoons at Cell B.



Photo 13: Looking South between Cell B (LG-112-02) and Cell C (LG-112-03) lagoons at Cell B.



Photo 14: Looking southwest between Cell B (LG-112-02) and Cell C (LG-112-03) lagoons at Cell C. Note: buckets with drilled holes contain chlorine tabs designed to float on lagoon surface.



Photo 15: Looking West between Cell B (LG-112-02) and Cell C (LG-112-03) lagoons at Cell C. Note: buckets with drilled holes contain chlorine tabs designed to float on lagoon surface.



Photo 16: Bent gate valve at the splitter box currently out of operation on western edge of LG-112-02 (Cell B)



Photo 17: Supplemental irrigation filters (green) on the western property edge. Irrigation vault under grating with pumps to send recycled water to RIB's, Field 1, and Field 2. Supplemental irrigation pumps were operating during the inspection.



Photo 18: Composite sampler and carboy (not current in operation) next to flow metering panels. DEQ staff discussed carboy must be washed prior to putting into service to remove organics.



Photo 19: Western-most fence access with signage. Reuse and supplemental irrigation station lies behind this.



Photo 20: Recycled water electromagnetic flow meters for SR Fields and RIBs – note piping coloration



Photo 21: Supplemental irrigation flow meter vault at western edge of WWTF



Photo 22: Southeastern view of MU-112-05 (SR Field 1) from LG-112-03 (Cell C) – no visible crop dead spots



Photo 23: Southern view of MU-112-05 (SR Field 1) from LG-112-03 (Cell C) – no visible crop dead spots



Photo 24: Southwestern view of MU-112-05 (SR Field 1) from LG-112-03 (Cell C) – no visible crop dead spots



Photo 25: Southern berm edge of LG-112-01 (Cell A) looking south – noting potential rain erosion dip on berm



Photo 26: Rapid Infiltration Basin #4 (MU-112-04) looking east



Photo 27: Center pivot from Field 2 entering RIB 3 at the southeastern corner.



Photo 28: Center pivot from Field 2 exiting RIB 2 in the southern section of the RI basin.



Photo 29: GW-112-02