

Class V Underground Injection Control Inspection Report

Facility Name: Lapwai School District #341
Facility Address: 204 District Road, Lapwai, Idaho 83540
Facility Mailing Address: P.O. Box 247, Lapwai, Idaho 83540
Facility Phone Number: 208-843-2622
Latitude: 46.39639
Longitude: -116.80432
Facility Participants:
 Alan White, Maintenance Director
 Dan Swearingen, Transportation Supervisor

Inspection Date/Time: 6/12/12, 9:30 a.m. – 11:33 a.m.

EPA Inspectors: Jennifer Parker
 Matthew Vojik

Additional Participant: Jarvis Weaskus, Nez Perce Tribe

Inspection Comments

This was a pre-announced Class V UIC inspection at Lapwai School District's Bus Transportation and Maintenance facility, elementary school, and high school. Jennifer Parker and Matthew Vojik presented credentials and provided the written Notice of Inspection to Mr. White (carbon copy attached). Mr. White consented to the inspection.

Facility Information

The Lapwai School District currently operates 10 school buses. The Bus Transportation and Maintenance facility has existed more than 10 years and Mr. White thinks it is likely at least 30 years old.

Mr. White was not aware of any permits under which the school district facilities operate and he did not think the school facilities have ever been identified as contaminated sites. Two Bureau of Indian Affairs public water system wells are located on the school district property.

In 2002, the school district was contacted by the EPA about their pesticide management practices. Mr. White explained that the school district changed their pesticide management practices as a result of the 2002 issue. School district staff currently sprays only Roundup and all other pest control has been contracted for the last 4-5 years to a company that is licensed to apply pesticides. The pesticide sprayer is currently rinsed by adding water to the sprayer and spraying the fluid onto vegetation.

Sanitary Waste Disposal

According to Mr. White, the school district facilities dispose of sanitary waste through the community sewer system. Mr. White thinks the school district facilities have been connected to the community sewer since the 1980's and he did not think the school district has ever used septic systems. Mr. Swearingen further explained that there were no bathroom facilities in the Bus Transportation and Maintenance Facility until 1997, at which time it was connected to sewer for sanitary waste disposal.

Bus Transportation and Maintenance Facility

The school district performs maintenance and repair of school buses and equipment at the Bus Transportation and Maintenance facility. The facility consists of two bays and an office in a building and an unroofed cement pad on the north side of the building where buses are washed. The building was constructed in two phases: the original building was constructed during the 1980's and an addition was constructed in 1997. The bay on the east side of the building is in the original portion of the building. Prior to 1997, buses and equipment were worked on in the east bay but since the 1997 addition, the east bay has only been used for equipment maintenance. The bay on the west side of the building is the current bus maintenance bay.

The school district conducts oil changes, works on brakes, replaces parts, and fills antifreeze in the bus bay. Larger maintenance and repair projects are done offsite. The school district currently maintains lawnmowers, repairs equipment, and tops off fluids in the equipment bay. Buses are washed on the cement pad on the north side of the building.

Bus Bay

A floor drain is located in the bus bay. The floor drain is covered with a square grate and below the grate is a turned down elbow pipe.



Photo: Floor drain in bus bay.

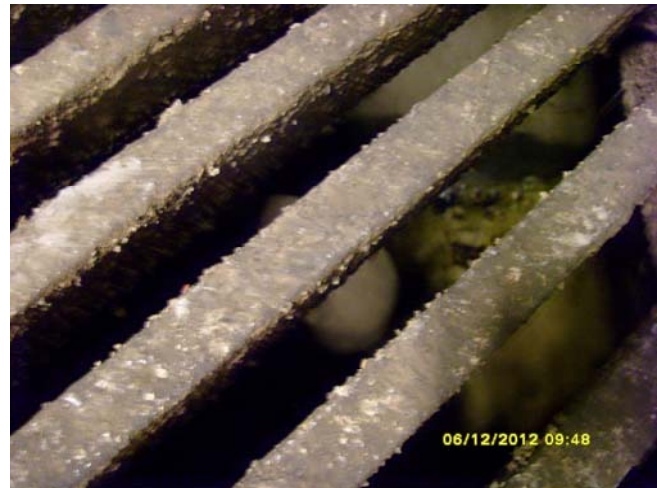


Photo: Looking at turned down elbow pipe under grate in floor drain in bus bay.

Mr. White and Mr. Swearingen both think that the bus bay floor drain is connected to the community sewer system. Mr. Swearingen thought he remembered that the bus bay floor drain was connected to the sewer before the floor was poured. According to the facility representatives, they have never needed to clean out the floor drain.

Floor wash water and snow melt have entered the bus bay floor drain. No cleaning agents are used when the floors are washed. Buses are not washed in the building. The facility representatives were not aware of any spills that have entered the floor drain. Spills are managed with floor dry. The inspectors did not observe any shop sinks in the bus bay.

Used oil is burned in a waste oil burner in the bus bay. Used antifreeze is containerized in the bus bay and taken to the Lewiston dump for disposal.

Equipment Bay

A round floor drain is located in the equipment bay. The inspectors observed sediment below the drain cover but did not observe any piping leading into or out of the sides of the drain. When asked where the floor drain discharges, Mr. Swearingen phoned Jim, the former maintenance supervisor, and relayed that Jim said it discharges to a drywell under a parking space near the office door on the east side of the building.



Photo: Floor drain in equipment bay.



Photo: Looking into equipment bay floor drain.



Photo: Looking west at parking space under which the facility representatives think the drywell is located.

A shop sink is located on the east side of the equipment bay. According to the information that Mr. Swearingen relayed from Jim, the shop sink discharges to the drywell on the east side of the building. According to the facility representatives the shop sink is used only for hand washing. A separate parts washer uses solvent and the school district disposes of the used solvent at the dump.

Floor wash water and snow melt have entered the equipment bay floor drain. No cleaning agents are used when the floors are washed. Buses are not washed in the building. The facility representatives were not aware of any spills that have entered the floor drain. Spills are managed with floor dry.

Bus Wash

The bus wash area is located on a cement pad on the north side of the building. The school district typically washes just the exteriors of the buses, but about once a year they clean an engine on the wash pad. The frequency of bus washing depends on the time of year; during fall and winter the exteriors of the buses are washed daily to clean off the lights and license plates for visibility and at other times of the year the buses are washed less often.

A drain cover is located on the cement pad in the bus wash area. Another drain cover is located east of the cement pad. The drain cover to the east is located near a well house in which one of the public water system wells is located. The inspectors used a tape measure and determined that the distance between the drain cover closest to the well house and the exterior of the well house is 36 feet.



Photo: Bus wash area and drain cover on cement pad.



Photo: Looking west toward bus wash on cement pad from drain cover closest to well house.



Photo: Looking east toward well house.



Photo: Looking south under cover of drain closest to well house.

The facility representatives referred to the drain covers as drywells but also explained that they think both drains are connected by piping to a drywell located in the elementary school playfield north of the transportation and maintenance facility; they think the drywell in the elementary school playfield may be the final discharge point for the bus wash fluids. The facility representatives did not know if any of the

bus wash fluids discharge underground beneath the drain covers. Mr. Swearingen ran water into the drain on the cement pad and showed the inspectors that the water flowed into the drain to the east.

Elementary School

A drywell on the elementary school playfield disposes of rain and snow runoff and, as described above, may also receive bus wash fluids from the Bus Transportation and Maintenance Facility.

Two roof drains are located on the front of the elementary school building. Mr. White thought that the roof drains either discharge underground or the runoff is routed to a nearby creek. He explained that the drains discharge through grates into dug areas filled with drain rock. The dug areas are approximately 4-5 feet deep and approximately 4-5 feet in diameter.



Photo: Roof drains on elementary school building.

Mr. White also identified two drain covers in the elementary school parking lot that receive stormwater. One of the drain covers is located near the roof drains on the front of the school building. Mr. White identified the drain cover closest to the roof drains as a drywell. The other drain cover is located in the northeast corner of the parking area. Mr. White thought that stormwater collected through the drain cover in the northeast corner discharges to a nearby creek. The inspectors observed a pipe in the side of the drain in the northeast corner of the parking lot that appears to be oriented to the north.



Photo: Stormwater drywell in front of elementary school.



Photo: Grate that collects stormwater in northeast corner of elementary school parking lot.

High School

Mr. White identified three drywells in the high school parking lot that dispose of stormwater. He also identified four roof drains on the high school that discharge to drywells. The roof drains were constructed in 2007 and 2009. Additional drywells for disposal of stormwater are located around the football field, but Mr. White did not know how many drywells are located on the field. According to Mr. White, the high school disposes of all other fluids through the community sewer.

Closing Conference

The inspectors provided the motor vehicle waste disposal well brochure and the small business resources handout to Mr. White and explained that the EPA will send a letter to the school district regarding the inspection findings. Mr. White requested that the EPA address the letter to Superintendent Aiken and cc Mr. White.

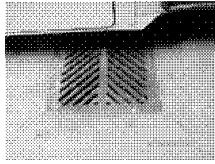
The inspectors explained that if the drain in the equipment bay discharges to a drywell, the EPA would be concerned about the risk to drinking water resources. Mr. White committed to work on trying to find out where it discharges. The inspectors also explained that drywells and other injection wells typically are not allowed within the 100-ft sanitary control area around a public water system well. If the drain cover located 36 ft away from the well house is a drywell that discharges bus wash fluids underground, the EPA would be concerned about the risk to drinking water.

Photo Log:

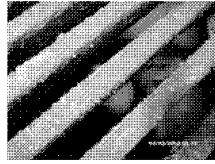
Photo Number	Description
SI850509.JPG	Grate covering floor drain under school bus in bus bay.
SI850510.JPG	Close-up of turned down elbow pipe beneath grate in floor drain in bus bay.
SI850511.JPG	Grate covering floor drain under school bus in bus bay.
SI850512.JPG	Floor drain in equipment bay.
SI850513.JPG	Floor drain in equipment bay.
SI850514.JPG	Floor drain in equipment bay.
SI850515.JPG	Area in parking lot identified by Mr. Swearingen as location of drywell (beneath empty parking space).

SI850516.JPG	Bus wash pad drain.
SI850517.JPG	Drain cover looking east toward well house.
SI850518.JPG	Drain cover looking west toward bus wash pad.
SI850519.JPG	Looking under cover of drain closest to well house (viewed looking south).
SI850520.JPG	Looking under cover of drain closest to well house (viewed looking north).
SI850521.JPG	Looking north toward elementary school playfield where Mr. Swearingen identified a drywell. Mr. Swearingen thinks the playfield drywell is connected to the drain on the bus wash pad and the drain closest to the well house, and is the final discharge point for the bus wash fluids.
SI850522.JPG	BIA drinking water well and well house.
SI850523.JPG	Drywell for stormwater in front of elementary school.
SI850524.JPG	Roof drains on elementary school. Mr. White explained that he did not know if discharge point of the roof drain is underground or if it is routed to a nearby creek.
SI850525.JPG	Grate that collects stormwater in northeast corner of elementary school parking lot.
SI850526.JPG	Grate that collects stormwater in northeast corner of elementary school parking lot.
SI850527.JPG	Looking at drains for stormwater in the high school parking lot.

Inspection Photos:



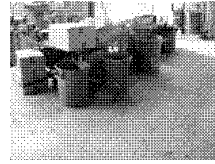
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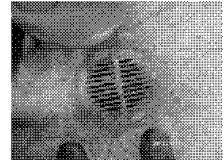
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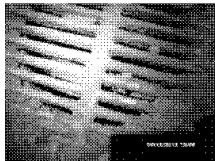
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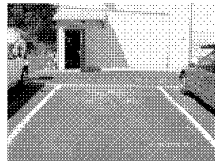
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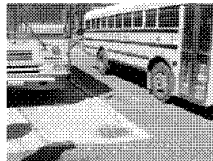
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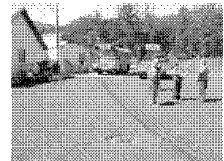
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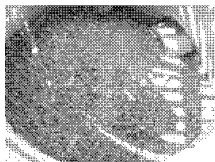
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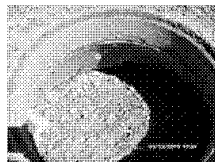
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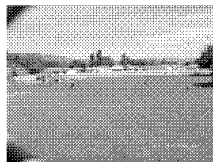
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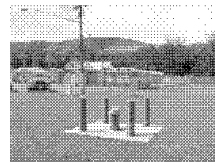
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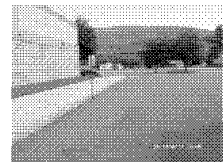
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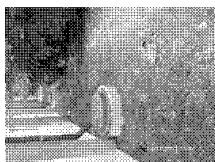
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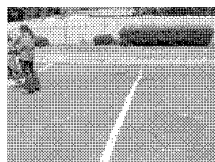
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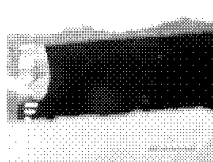
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Report prepared by: _____

Date completed: _____