



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 W. 15<sup>th</sup> STREET, SUITE 3200  
HELENA, MONTANA 59626**

**STATEMENT OF BASIS**

---

PERMITEE: City of Ronan  
207 Main Street SW #A  
Ronan, MT 59864

FACILITY: City of Ronan Water Treatment Plant

PERMIT NO: MT0030821

CONTACT: Mark Clary  
City of Ronan  
207 Main Street SW #A  
Ronan, MT 59864

PERMIT TYPE: Minor Industrial, Indian Country, New

RECEIVING WATER: Pablo Feeder Canal to Middle Crow Creek

LOCATION: NE ¼ of Section 33, Township 21 N, Range 19W  
Latitude 47° 32' 27"N, Longitude 114° 2' 15"W

A. Permit Status

This statement of basis is for a new discharge from an existing water treatment plant (WTP). The WTP and its discharge are located within the boundaries of the Flathead Reservation which is home to the Confederated Salish and Kootenai Tribes (CSKT). The CSKT has been approved by the Environmental Protection Agency (EPA) for "Treatment as a State." The CSKT's water quality standards (WQS) have been approved by EPA.

B. Facility Description

The existing WTP consists of an intake structure on Middle Crow Creek, a transmission main, a settling pond, and an ozone treatment plant. The proposed WTP will be a UV treatment plant using the existing surface water intake on Middle Crow Creek. The settling pond will be eliminated. Two filters are proposed upstream of the UV reactor. A rough (3,500 microns) filter and a fine (130 microns) filter will capture large debris such as sticks and leaves, rocks, and sand. The filters will be backwashed multiple times a day to clean captured debris from the filter. The permittee proposes to discharge the backwash water to a vegetated swale. A straw barrier will be installed in the swale to capture and remove debris before the backwash water flows to the Pablo Feeder Canal. Discharge will be measured and samples taken at a weir in the discharge pipe. The discharge flow is projected to be 14 gallons per minute (gpd).

Approximately one-tenth of a mile downstream, Middle Crow Creek flows into the canal. There is an overflow gate which allows for entry of the canal water into the lower portion of Middle Crow Creek.

The proposed WTP will add chlorine to the filtered water to meet the requirements for residual chlorine in the City's distribution system. After chlorination, the treated drinking water enters the City's distribution system and is distributed to users without any further treatment. No other chemicals are used at the WTP.

C. Discharge Data

The WTP has not been constructed yet so no discharge data exists. According to the permit application, the backwash water that will be discharged will only contain sticks, leaves, rocks, and sand captured by the rough and fine filters.

D. Technology Based Effluent Limitations

There are currently no technology based effluent guidelines that apply to water treatment plants. Based on the description of the proposed WTP, Total Suspended Solid (TSS) has the potential to be discharged. Using Best Professional Judgment (BPJ), a 30-day average of 30 mg/L TSS and a daily maximum of 60 mg/L TSS should be achievable and will be used as effluent limits in the permit.

E. Water Quality Effluent Limitations

According to the Tribal WQS, Flathead River and its tributaries, including Middle Crow Creek, are classified as B-1. Waters classified B-1 must be maintained suitable for drinking and culinary and food processing purposes after conventional treatment; bathing, swimming and recreation; wildlife (birds, mammals, amphibians and reptiles); the growth and propagation of salmonid fishes and associated aquatic life; and agricultural and industrial water supply purposes.

According to the CSKT WQS, no increases above natural concentrations are allowed of sediment, contaminated sediment, settleable solids, oils, or floating solids that create or are likely to create a nuisance or render the waters harmful, detrimental, or injurious to public health, recreation, safety, welfare, livestock, fish, or other wildlife. The effluent limits established in Section D above should be protective of water quality. A limit of 10 mg/L on oil and grease also by will be included to protect water quality.

F. Effluent Limitations

The effluent limitation and the basis for the limitations are given in the table below:

| <b>Table 1. Final Effluent Limitations</b>                                                                     |                            |                      |              |
|----------------------------------------------------------------------------------------------------------------|----------------------------|----------------------|--------------|
| <b>Effluent Characteristic</b>                                                                                 | <b>Effluent Limitation</b> |                      | <b>Basis</b> |
|                                                                                                                | <b>30-Day Average</b>      | <b>Daily Maximum</b> |              |
| <b>Total Suspended Solids, mg/L</b>                                                                            | 45                         | 60                   | TBEL         |
| <b>Oil and Grease, mg/L <sup>a/</sup></b>                                                                      | NA                         | 10                   | WQS          |
| No chemicals may be added to the water prior to its discharge to the Pablo Feeder Canal and Middle Crow Creek. |                            |                      |              |

<sup>a/</sup> In the event that an oil sheen or floating oil is observed in the discharge, a grab sample shall immediately be taken, analyzed, and reported.

G. Self-Monitoring Requirements

| <b>Table 2. Monitoring Requirements</b> |                  |                    |
|-----------------------------------------|------------------|--------------------|
| <b>Effluent Characteristic</b>          | <b>Frequency</b> | <b>Sample Type</b> |
| Flow                                    | Quarterly        | Instantaneous      |
| TSS, mg/l                               | Quarterly        | Grab               |
| Oil and Grease <sup>a/</sup>            | Quarterly        | Visual or Grab     |

<sup>a/</sup> In the event that an oil sheen or floating oil is observed in the discharge, a grab sample shall immediately be taken, analyzed, and reported.

H. Endangered Species Act (ESA) Requirements

Section 7(a) of the Endangered Species Act requires federal agencies to insure that any actions authorized, funded, or carried out by an Agency are not likely to jeopardize the continued existence of any federally-listed endangered or threatened species or adversely modify or destroy critical habitat of such species.

According to the U.S. Fish and Wildlife Service, Montana Field Office, internet site at <http://www.fws.gov/mountain-prairie/mt.html>, Table 3 lists the federally listed threatened, endangered and candidate species and proposed and designated critical habitat found on the Flathead Reservation in Montana.

| <b>Table 3: Threatened, Endangered, and Candidate Species on the Flathead Reservation</b> |                                |                                    |                                                                                                                                                                    |
|-------------------------------------------------------------------------------------------|--------------------------------|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Common Name</b>                                                                        | <b>Scientific Name</b>         | <b>Status</b>                      | <b>Habitat</b>                                                                                                                                                     |
| Bull Trout                                                                                | <i>Salvelinus confluentus</i>  | Threatened;<br>Critical<br>Habitat | Clark Fork, Flathead, Kootenai, St Mary, and Belly River basins; cold water rivers and lakes.                                                                      |
| Grizzly Bear                                                                              | <i>Ursus arctos horribilia</i> | Threatened                         | Resident, transient;<br>Alpine/subalpine coniferous forest                                                                                                         |
| Canada Lynx                                                                               | <i>Lynx canadensis</i>         | Threatened                         | Resident; western Montana-montane spruce/fir forests                                                                                                               |
| Spaldings’s Champion (or “catchfly”)                                                      | <i>Silence spaldingii</i>      | Threatened                         | Upper Flathead River Fisher river drainages; Tobacco Valley – open grasslands with rough fescue or bluebunch wheatgrass                                            |
| Water Howellia                                                                            | <i>Howellia aquatilis</i>      | Threatened                         | Wetlands; Swan Valley, Lake and Missoula Counties                                                                                                                  |
| Wolverine                                                                                 | <i>Gulo gulo luscus</i>        | Candidate                          | High elevation alpine and boreal forests that are cold and receive enough winter precipitation to reliably maintain deep persistent snow late into the warm season |
| Whitebark Pine                                                                            | <i>Pinus albicaulis</i>        | Candidate                          | Forested areas in central and western Montana, in high-elevation, upper montane habitat near treeline                                                              |

The EPA finds this permit is Not Likely to Adversely Affect any of the species listed by the US Fish and Wildlife Service under the Endangered Species Act. The finding is based upon protection of designated uses by limiting TSS in the effluent to no increase above naturally occurring.

## I. National Historic Preservation Act (NHPS) Requirements

Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. § 470(f) requires that federal agencies consider the effects of federal undertakings on historic properties. EPA has evaluated its planned reissuance of the NPDES permit for the Facility to assess this action's potential effects on any listed /eligible historic properties or cultural resources. EPA does not anticipate any impacts on listed/eligible historic properties or cultural resources because the new WTP will be constructed in the footprint of the old WTP.

## J. Miscellaneous

The effective date of the permit and the permit expiration date will be determined at the time of issuance. The permit will be issued for a period of approximately five years but not to exceed five years.

Prepared by Rosemary Rowe  
May8, 2012

No comments were received during the public comment period.  
Rosemary Rowe  
July 19, 2012