U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA), REGION 8
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
STATEMENT OF BASIS

PERMITTEE:	U. S. Department of the Interior, National Park Service
FACILITY:	Mesa Verde National Park Wastewater Treatment Plant
PERMIT NUMBER:	CO-0034398
RESPONSIBLE OFFICIAL:	Michael Rubin, Facility Manager
FACILITY CONTACT:	Bryon D. Long, Operator (970) 529-5056 Email: bryon_long@nps.gov
MAILING ADDRESS:	P. O. Box 8 Mesa Verde, Colorado 81330
PERMIT TYPE:	Federal Facility Minor – Permit Renewal

Introduction

This statement of basis (SoB) is for the renewal of a NPDES permit to the Mesa Verde National Park (Park) wastewater treatment facilities that serve the Mesa Verde National Park. The Permit establishes discharge limitations for any discharge of water from the facility outfalls. The SoB explains the nature of the discharges, the EPA's decisions for limiting the pollutants in the wastewater, and the regulatory and technical basis for these decisions.

The EPA, Region 8 is the permitting authority for Colorado federal facilities and provides implementation of federal and state environmental laws within Colorado.

Summary of Specific Changes from the Previous Permit

1. Monitoring for total nitrogen and total phosphorus will be required with this permit issuance to determine if there is reasonable potential to cause or contributes to an in-stream excursion above the water quality standards.

Background Information

The Park is in Montezuma County, Colorado. It has a year-round staff of approximately 625 people as well as seasonal tourist traffic that is heaviest during the summer months. The Park estimates that 600,000 people visit their facility each year. The amount of wastewater generated at the Park facilities varies greatly due to the tourist traffic. Four different wastewater treatment facilities with separate discharge locations are covered by this Permit.

Outfall 001 (Cedar Tree) is in Section 16, Township 34N of Ute line, Range 15W, latitude 37.197242º, longitude, 108.485464º. The outfall is located about 400 feet west of the Cedar Tree wastewater treatment facility which services the Chapin Mesa area of the Park. Three lift stations pump wastewater to the Cedar Tree system from concession stands and restrooms in the southern area of the Park. The Cedar Tree facility is a three-cell lagoon system with a design flow of 0.085 million gallons per day (mgd). Chapin Mesa has a year-round population of approximately 50 to 70 people; but from April to September, the service population is approximately 400 people. The facility normally discharges weekly of 0.032 mgd. It discharges to an unnamed tributary that flows into Spruce Canyon and reaches the Mancos River. The LemTec Biological Treatment Process (LBTP) was put in operation in October 2017. The LBTP is composed of two ponds (aeration pond and settling pond) to meet the Biochemical Oxygen Demand (BOD_5) and ammonia (NH_3) limits for the Cedar Tree facility. The aeration pond consists of two cells separated by hydraulic baffle. Submerged diffusers are placed on the pond floor for aeration and mixing. The Lemna Polishing Reactors follow the settling pond. Positive displacement blowers are also provided for air supply. This facility disinfects the effluent water with sodium hypochlorite 10%.

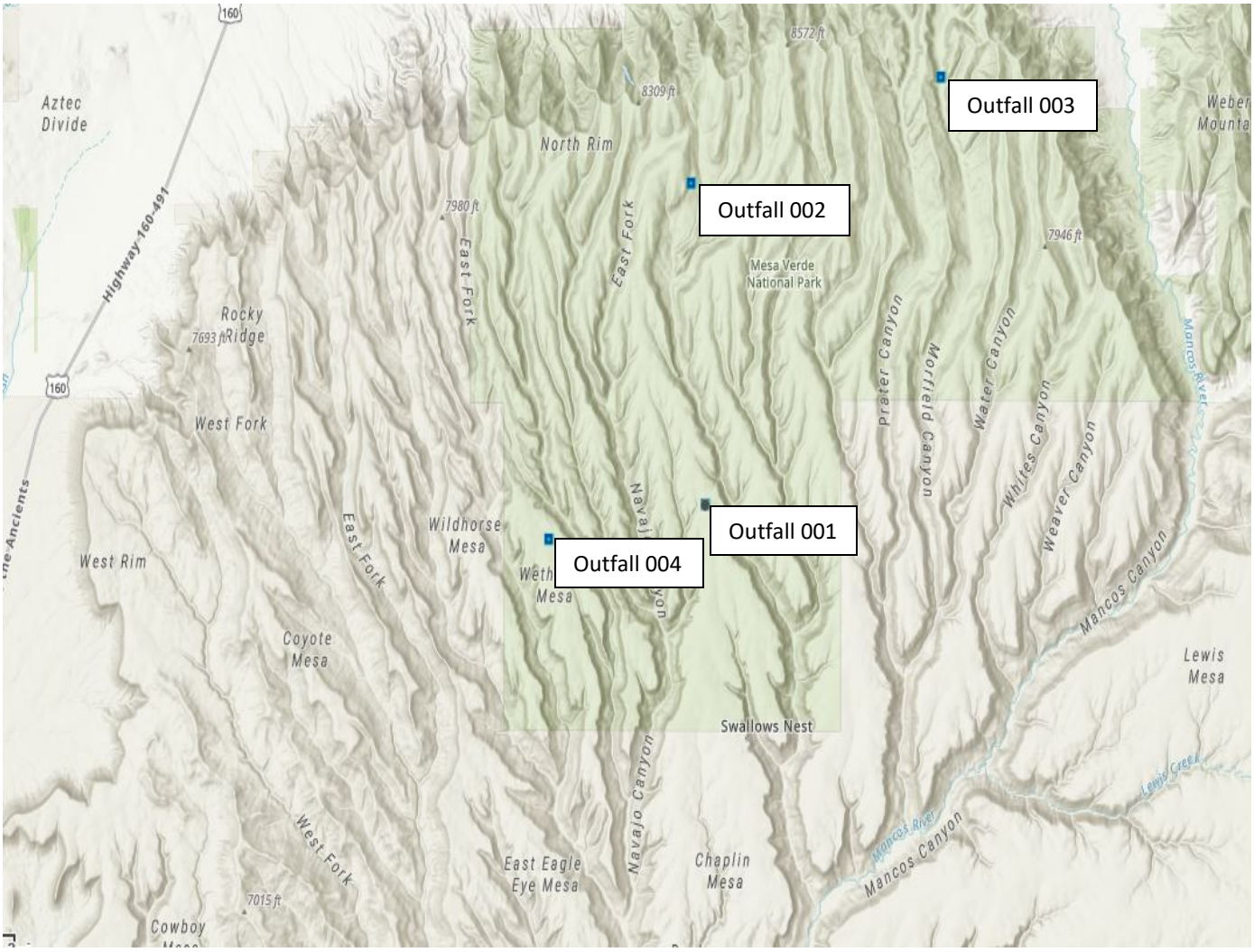
Outfall 002 (Far View) is in Section 27, Township 35N, Range 15W, latitude 37.255283º, longitude, 108.489703º. The outfall is located approximately 300 feet southwest of the Far View wastewater treatment facility. The facility is a three-cell lagoon system with a mechanical chlorination system with a design flow of 0.05 mgd. One lift station pumps wastewater to the Far View system from concession stands, restrooms, and the lodge in the central part of the Park. There are no year-round residents served by the facility but 15 to 20 people use the office facilities year-round. During the summer tourist season, the service population is estimated at 600 people. This facility discharges about 0.022 mgd from May through November, seasonally. It discharges to an unnamed tributary that flows into Little Soda Canyon and reaches the Mancos River. A smaller LBTP, about 40% of the size of the Cedar Tree facility is expected to be installed in early 2019 to meet the BOD_5 and NH_3 limits for the Far View facility. This facility disinfects the effluent water with sodium hypochlorite 10%.

Outfall 003 (Morefield) is in Section 20, Township 35N, Range 14W, latitude 37.274444° and longitude 108.416111°. The outfall is located near the Morefield Village area of the Park. The facility is a three-cell lagoon system; two cells are operating, one is unused. The facility is designed for no discharge with each cell having a surface area of 1.6 acres. There are two permanent year-round residents and an estimated service population of 500 during the summer tourist season. The system also receives portable toilet waste from other locations within the Park boundaries. The facility does not discharge.

Outfall 004 (Wetherill Mesa) is in Section 13, Township 34N, Range 16W, latitude 37.190833° and longitude 108.531889°. The outfall is located near the Wetherill Mesa. The facility is a three-cell lagoon. The lagoons receive flow from two comfort stations and a concession area during the tourist season from Memorial Day through Labor Day. The Park Service estimates that the lagoons receive less than 500,000 gallons of influent flow annually. The lagoons are designed to receive 40,000 gallons per day. The facility does not discharge.

The Mesa Verde National Park wastewater treatment facilities map is shown below in Figure 1.

Figure 1. Mesa Verde National Park Wastewater Treatment Facility Locations



Receiving Waters

All discharges from the Mesa Verde National Park wastewater treatment facilities will reach tributaries of the Mancos River.

Outfall 001 (Cedar Tree) discharges to an unnamed drainage way in Spruce Canyon that ultimately reaches the Mancos River approximately 10 miles away.

Outfall 002 (Far View) discharges to an unnamed drainage way in Little Soda Canyon that ultimately reaches the Mancos River approximately 10 miles away.

Outfall 003 (Morefield) does not discharge and is located in an unnamed drainage in Morefield Canyon.

Outfall 004 (Wetherill Mesa) does not discharge and is located in Wetherill Mesa.

Monitoring Data

Below is a summary of monitoring results for discharges under the existing permit reported from March 31, 2013 through December 31, 2017 for Cedar Tree Outfall 001 and Far View Outfall 002.

Table 1. Summary of Self - Monitoring Results for Outfall 001 – Cedar Tree						
Effluent Characteristic	30-Day Average		7-Day Average		Effluent Limitation	
	Min.	Max.	Min.	Max.	30-Day	7-Day
Flow (mgd)	0	0.05	-	-	0.085	-
Biological Oxygen Demand (BOD_5), mg/L	0	18.6	2	12	30	45
Total Suspended Solids (TSS) (mg/L)	1	26.7	1	58	30	45
Escherichia coli (E. coli), #/100 mL	1	61	1	61	126	252
Total Residual Chlorine (TRC), mg/L	0	0	0	0	0.011	0.019 (Daily max)
pH	-		6.87	9	Not less than 6.5 nor greater than 9.0 at any time	
Total Dissolved Solids (TDS), mg/L	-		20	245	No more than 400 mg/L	
Oil and Grease (mg/L)	0				No sheen & 10 mg/L max.	
Ammonia, as N, mg/L	Monthly Min. = 0.41 and Max. = 74.4					

Table 2. Summary of Self - Monitoring Results for Outfall 002 – Far View						
Effluent Characteristic	30-Day Average		7-Day Average		Effluent Limitation	
	Min.	Max.	Min.	Max.	30-Day	7-Day
Flow (mgd)	0.02	0.04	-	-	0.05	-
BOD_5, mg/L	4	30	4	30	30	45
TSS (mg/L)	3	18	3	24	45	60
E. coli, #/100 mL	1	60	1	60	126	252
TRC, mg/L	0	0	0	0	0.011	0.019 (Daily max)
pH	-		7	9	Not less than 6.5 nor greater than 9.0 at any time	
TDS, mg/L	-		95	330	No more than 400 mg/L	
Oil and Grease (mg/L)	0				No sheen & 10 mg/L max.	
Ammonia, as N, mg/L	Monthly Min. = 0.16 and Max. = 13.9					

The Cedar Tree facility (Outfall 001) had two TSS exceedances of the 7-day average during the June 30, 2013 and September 30, 2014 reporting periods. All other monitoring data were in compliance with permit limitations.

The Far View facility (Outfall 002) had no exceedance.

Both Morefield and Wetherill Mesa facilities (Outfall 003 and 004) reported no discharge during the entire term of the existing permit.

Water Quality Considerations

Water quality standards for this basin are found in Colorado Regulations No. 34 (see Table 3 below). The receiving waters are within Region 9, Segment 6c. All tributaries to the Mancos River located in Mesa Verde National Park Segment 6c have been designated by the State of Colorado as Outstanding Waters.

Title 5 of the Code of Colorado Regulations 1002-31, Regulation No. 31, the Basic Standards and Methodologies for Surface Water, specifically 31.8 (1) Antidegradation Rule states: "(a) The highest level of water quality protection applies to certain waters that constitute an outstanding state or national resource. These waters, which are those designated outstanding waters pursuant to section 31.8(2)(a), shall be maintained and protected at their existing quality." Therefore, there can be no increase in the amount of pollutants discharged to the receiving water.

The designated uses include Aquatic Life Warm 1, Agriculture, and Recreation E.

Aquatic Life Warm 1: These are waters that (1) currently are capable of sustaining a wide variety of warm water biota, including sensitive species, or (2) could sustain such biota but for correctable water quality conditions. Waters shall be considered capable of sustaining such biota where physical habitat, water flows or levels, and water quality conditions result in no substantial impairment of the abundance and diversity of species.

Agriculture: These surface waters are suitable or intended to become suitable for irrigation of crops usually grown in Colorado and which are not hazardous as drinking water for livestock.

Recreation E (Existing Primary Contact Use): These surface waters are used for primary contact recreation or have been used for such activities since November 28, 1975.

Table 3 below summarizes the numeric criteria for this segment (from Regulation #34 table):

REGULATION #34 STREAM CLASSIFICATIONS and WATER QUALITY STANDARDS

La Plata River, Mancos River, McElmo Creek and San Juan River in Montezuma County and Dolores County

6c. All tributaries to the Mancos River located in Mesa Verde National Park.

COSJLP06C	Classifications
Designation	Agriculture
OW	Aq Life Warm 1
	Recreation E
Qualifiers:	
Other:	

Physical and Biological	DM	MWAT
Temperature °C	WS-III	WS-III
	acute	chronic
D.O. (mg/L)	---	5.0
pH	6.5 - 9.0	---
chlorophyll a (mg/m^2)	---	150
E. Coli (per 100 mL)	---	126
Inorganic (mg/L)		
	acute	chronic
Ammonia	TVS	TVS
Boron	---	0.75
Chloride	---	---
Chlorine	0.019	0.011
Cyanide	0.005	---
Nitrate	100	---
Nitrite	0.05	---
Phosphorus	---	0.17
Sulfate	---	---
Sulfide	---	0.002

Metals (ug/L)	acute	chronic
Aluminum	---	---
Arsenic	340	---
Arsenic(T)	---	7.6
Beryllium	---	---
Cadmium	TVS	TVS
Chromium III	TVS	TVS
Chromium III(T)	---	100
Chromium VI	TVS	TVS
Copper	TVS	TVS
Iron(T)	---	1000
Lead	TVS	TVS
Manganese	TVS	TVS
Mercury	---	0.01(t)
Molybdenum(T)	---	---
Nickel	TVS	TVS
Selenium	TVS	TVS
Silver	TVS	TVS
Uranium	---	---
Zinc	TVS	TVS

Pollutants of concern from this wastewater discharge that may affect water quality include pH, ammonia, chlorine, and bacteria (*E. coli*). Colorado Regulation #85 for nutrients management control regulation does not apply to lagoon systems of 1 mgd or less.

Effluent Limitations

Cedar Tree (Outfall 001)

Limits for BOD_5 and TSS are based on National Secondary Treatment Standards (40 CFR Part 133). Oil and grease limits are based on Colorado Regulations for Effluent Limitations (Colorado Regulation No. 62). *E. coli*, total residual chlorine, ammonia as nitrogen, and pH limits are based on water quality standards for Segment 6c (all tributaries to the Mancos River located in the Mesa Verde National Park) of the La Plata River, Mancos River, McElmo Creek, and San Juan River in Montezuma County and Dolores County (Colorado Regulation No. 34). TDS limits are based on the Colorado River Basin Salinity Policy and Colorado Regulation No. 39 and carried over from the previous permit.

Effluent Characteristic	30-Day Average	7-Day Average	Daily Maximum
Flow, mgd	0.085	N/A	N/A
BOD_5, mg/L	30	45	N/A
TSS, mg/L	30	45	N/A
E. coli, #/100 ml	126	N/A	N/A
TRC, mg/L	0.011	N/A	0.019
Ammonia-Nitrogen (as N), mg/L			
January	5.1	N/A	13
February	4.7	N/A	11
March	3.2	N/A	7.3
April	1.9	N/A	6.1
May	2.4	N/A	7.9
June	3.0	N/A	10
July	2.3	N/A	9.7
August	1.9	N/A	7.9
September	2.3	N/A	8.7
October	3.4	N/A	11
November	3.7	N/A	11
December	3.7	N/A	8.9
The pH of the effluent shall not be less than 6.5 or greater than 9.0 in any single sample or analysis.			
The concentration of oil and grease in any single sample shall not exceed 10 mg/L. There shall be no visible sheen in the receiving water or on the adjoining shoreline.			
The concentration of TDS in the discharge shall not be more than 400 mg/L greater than (incremental increase of 400 mg/L) the TDS concentration in the raw potable water supply before treatment.			

Far View (Outfall 002)

Limits for BOD_5 and TSS are based on National Secondary Treatment Standards (40 CFR Part 133). Oil and grease limits are based on Colorado Regulations for Effluent Limitations (Colorado Regulation No. 62). *E. coli*, total residual chlorine, ammonia as nitrogen, and pH limits are based on water quality standards for Segment 6c (all tributaries to the Mancos River located in the Mesa Verde National Park) of the La Plata River, Mancos River, McElmo Creek, and San Juan River in Montezuma County and Dolores County (Colorado Regulation No. 34). TDS limits are based on the Colorado River Basin Salinity Policy and Colorado Regulation No. 39 and carried over from the previous permit.

Effluent Characteristic	30-Day Average	7-Day Average	Daily Maximum
Flow, mgd	0.05	N/A	N/A
BOD_5, mg/L	30	45	N/A
TSS, mg/L	30	45	N/A
E. coli, #/100 ml	126	N/A	N/A
TRC, mg/L	0.011	N/A	0.019

Ammonia-Nitrogen (as N), mg/L			
January	5.1	N/A	13
February	4.7	N/A	11
March	3.2	N/A	7.3
April	1.9	N/A	6.1
May	2.4	N/A	7.9
June	3.0	N/A	10
July	2.3	N/A	9.7
August	1.9	N/A	7.9
September	2.3	N/A	8.7
October	3.4	N/A	11
November	3.7	N/A	11
December	3.7	N/A	8.9
The pH of the effluent shall not be less than 6.5 or greater than 9.0 in any single sample or analysis.			
The concentration of oil and grease in any single sample shall not exceed 10 mg/L. There shall be no visible sheen in the receiving water or on the adjoining shoreline.			
The concentration of TDS in the discharge shall not be more than 400 mg/L greater than (incremental increase of 400 mg/L) the TDS concentration in the raw potable water supply before treatment.			

The ammonia limits for both Outfalls 001 and 002 were established based on the Colorado Ammonia Toxicity Model (AMMTOX, version 2) in the previous permit. A compliance schedule was given for these limits in the previous permit. The ammonia limits were effective on September 1, 2018 for both Outfalls 001 and 002. The EPA received a letter on September 12, 2018 from the U.S. Department of the Interior, National Park Service indicated that Cedar Tree (Outfall 001) has met all ammonia limits. However, they have not met the ammonia limits at Far View (Outfall 002) as of September 1, 2018. This is due to ongoing government contracting negotiations for the new modified reactor construction. The construction for the new reactor was completed, but the final product was not functioning as designed. The letter stated that the new modified reactor construction should be complete by the time there is any discharges from Outfall 002 in 2019. The discharge will meet the ammonia limits. Based on the information above, all ammonia limits are carried over from the previous permit.

Morefield (Outfall 003)

There shall be no discharge from Outfall 003.

Wetherill Mesa (Outfall 004)

There shall be no discharge from Outfall 004.

Antidegradation Review

The receiving waters for this facility are within the Colorado Water Quality Control Commission's Mancos River Segment 6c, (COSJLP06C), described in the Commission's Regulation 34, 5 CCR 1002-34.
The Colorado Water Quality Control Commission designated all waters in the Mancos River Segment 6c as outstanding waters in 2007. As set out in "The State of Colorado's *Basic Standards and Methodologies for Surface Water*", 5 CCR 1002-31, Section 31.8(2)(a), "The highest level of water quality protection applies to certain waters that constitute an outstanding state or national resource. These waters, which are

those designated outstanding waters pursuant to section 31.8(2)(a), shall be maintained and protected at their existing quality."

No degradation is allowed for outstanding waters. The water quality has to be maintained and protected at the quality existing as of the time the segment was designated an outstanding water by the Colorado Water Quality Control Commission in 2007.

In order to ensure that this segment of the Mancos to be maintained and protected at its 2007 quality, the State of Colorado would like Mesa Verde's water quality based effluent limits to be established at 85% of the stream quality near the applicable points of discharge at the date of the outstanding waters designation (2007) or the current standard, whichever is stricter.

The EPA conducted the analysis below in order to demonstrate that the water quality effluent limits, such as TRC and ammonia as nitrogen, meet the outstanding water antidegradation requirement required by the State of Colorado. The tables below show the 2007 DMR data for Outfall 001 and 002 from the facility. By comparing these data to the current water quality standards, the current water quality standards for TRC and ammonia are stricter. Therefore, the effluent limits will be based on the current water quality standards as outlined in the above effluent limitation tables.

Outfall 001	2007 TRC, mg/L	2007 Ammonia as nitrogen, mg/L
Min.	0.3	8
Average	0.8	17
Max.	2.0	34

Outfall 002	2007 TRC, mg/L	2007 Ammonia as nitrogen, mg/L
Min.	0.1	0.04
Average	0.1	11.42
Max.	0.1	26.6

The BOD_5 and TSS do not apply for this analysis since they are technology based limits. The E. coli limit of 126 #/100 mL will be used since it is a better indicator than the total coliform used in 2007.

Effluent Discharge Self-Monitoring Requirements

The following self-monitoring requirements apply only during discharge for Cedar Tree (Outfall 001) and Far View Visitor Center (Outfall 002) are included in this Permit:

Parameter	Frequency	Sample/Monitoring Type a/ b/
Total Flow, mgd c/	Weekly	Instantaneous
BOD_5, mg/L	d/	Grab
TSS, mg/L	d/	Grab
E. coli, #/100 mL	Quarterly	Grab
TRC, mg/L e/	Weekly	Grab
pH, standard units	Weekly	Grab
Oil and Grease, mg/L	f/	Grab
Oil and Grease Sheen	Weekly	Observation f/
Ammonia as Nitrogen, mg/L	Monthly	Grab
TDS, mg/L	Quarterly g/	Grab

Temperature, °C	Weekly	Instantaneous
Total Nitrogen (sum of TKN, nitrate and nitrite), mg/L	Quarterly h/	Composite
Total Phosphorus, mg/L	Quarterly h/	Composite

a/ See Definitions, Part 1.1 of the Permit, for definitions of terms.

b/ Samples for flow, pH, and temperature shall be collected at the same time.

c/ Flow measurements of effluent volume shall be made in such a manner that the Permittee can affirmatively demonstrate that representative values are being obtained. The average flow rate (in gallons per day) during the reporting period and the daily maximum flow (maximum volume discharged during a 24-hour period) shall be reported.

d/ The frequency of monitoring for BOD_5 and TSS shall be monthly from April through September and quarterly from October through March.

e/ The analysis for TRC shall be conducted using reliable devices (Equivalent to Standard Methods 4500-Cl-G, Spectrophotometric, DPD). The method achieves a method detection limit of less than 50 µg/L.

In the calculation of average TRC concentrations, those analytical results that are less than the method detection limit shall be considered zero for calculation purposes. If all individual analytical results that would be used in the calculations are below the method detection limit, then "< 50 µg/L" shall be reported on the quarterly DMR. Otherwise, report the calculated value.

f/ In the event that an oil sheen or floating oil is observed in the discharge, a grab sample shall be taken immediately, analyzed, and reported. The analytical result shall not exceed 10 mg/L.

g/ Samples of the raw potable water intake before treatment and effluent from Outfall 001 shall be collected and analyzed for TDS on a quarterly basis. Electrical conductivity measurements may be substituted for TDS measurements if a satisfactory correlation is established on a minimum of five (5) samples.

h/ Samples shall be conducted on a two (2) day progression; i.e., if the first sample is on a Monday, during the next sampling period sampling shall begin on a Wednesday, etc. The sampling day shall be recorded in the daily log and reported.

Reporting of Monitoring Results: With the effective date of this Permit, the Permittee must electronically report all monitoring data into the discharge monitoring reports (DMR) on a quarterly frequency using NetDMR. Electronic submissions by the Permittee must be submitted to the EPA Region 8 no later than the 28th of the month following the completed reporting period. The Permittee must sign and certify all electronic submissions in accordance with the signatory requirements of the Permit. NetDMR is accessed from the internet at https://netdmr.zendesk.com/home.

The DMRs are due quarterly and are due by the dates listed below and shall not be submitted until the reporting period is complete.

Compliance Monitoring Period	Due Date
January through March	April 28
April through June	July 28
July through September	October 28
October through December	January 28

Legible copies of all other reports shall be signed and certified in accordance with the Signatory Requirements (see section 4.7), and submitted to the EPA Region 8 Enforcement and Compliance Assurance Division and the state at the addresses given below:

original to: U.S. EPA, Region 8 (8ENF-W)
Attention: *DMR Coordinator*
1595 Wynkoop Street
Denver, Colorado 80202-1129

copy to: Colorado Department of Public Health and Environment (CDPHE)
Water Quality Control Division
WQCD-PE-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Until December 21, 2020, all other reports (e.g., Parts 2.8 and 2.9) as well as sewer overflow event reports, are to be submitted by mail to the given addresses above. Effective December 21, 2020, these reports are to be submitted using the NPDES Electronic Reporting Tool (NeT) (40 CFR part 127). If the NeT tool is not available on December 21, 2020, the reports can continue to be submitted to the addresses above until such time as the tool is available. NeT is a tool suite developed by the EPA to facilitate electronic submittal of data by the regulated community directly to the EPA and its partners. It uses commercial "off-the-shelf" software and can support diverse form and data submission formats. For more information about NeT, please visit: https://www.epa.gov/compliance/national-pollutant-discharge-elimination-system-npdes-electronic-reporting-tool-net-fact.

Lagoon Inspection Requirements

As a preventative measure, the Permit requires that the Permittee inspect the wastewater lagoons on at least a weekly basis. The objectives of the inspections are to confirm that proper operation and maintenance procedures are being put into practice. The Permittee is to maintain a record of inspections. The record is to include the date and time of the inspection; the name(s) of the person(s) conducting the inspection; any problems identified (for example, excessive vegetation in the lagoons, animal burrowing); recommendations, as appropriate, to remedy identified problems; and a brief description of any actions taken regarding to the identified problems. The records of inspection are to be retained on-site at the facility or at a nearby office for the facility.

Endangered Species Act

Section 7(a) of the Endangered Species Act requires Federal agencies to ensure 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.

The U. S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) website program was utilized to determine what federally listed Endangered, Threatened, Proposed and Candidate Species may occur within the project area. The federally listed threatened and endangered species that may occur downstream of the WWTP outfalls include:

Species/Critical Habitat	Scientific Name	Status	Determination
New Mexico meadow jumping mouse	*Zapus hudsonius luteus*	Endangered	No effect
Mexican spotted owl	*Strix occidentalis lucida*	Threatened	No effect
Southwestern willow flycatcher	*Empidonax trailii extimus*	Endangered	No effect
Colorado pikeminnow	*Ptychocheilus lucius*	Endangered	No effect
Greenback cutthroat trout	*Oncorhynchus clarki ssp. stomias*	Threatened	No effect
Razorback sucker	*Xyrauchen texanus*	Endangered	No effect

The EPA utilized the information provided by the USFWS IPaC system to identify a determination for each species in the table above. In addition, the EPA had several informal consultation phone calls with USFWS regarding this project.

The justification to support the determination for the species are as follows. This is a renewal permit. There will be no expected changes in water quality in the receiving water and no new construction for this facility. Any water discharged will have been treated to applicable water quality standards, criteria, and requirements; therefore, there are no expected changes or impacts to downstream habitats.

The facility location is outside of their critical habitat for New Mexico meadow jumping mouse, Mexican spotted owl, and Southwestern willow flycatcher. In addition, no changes are anticipated to aquatic habitat and no changes are expected in associated riparian habitats that support these species.

The facility location is outside of its occupied habitat and does not deplete water from basin for the Colorado pikeminnow and Razarback sucker.

Greenback cutthroat trout does not occur within the project area since it is warm water habitat based on the waterbody designation in Colorado Regulation #34, not cold water.

Based on the IPaC information and informal consultation with USFWS, the EPA determines this Permit is "No effect" to the species as described in the table above. Since a "No effect" determination was made, no consultation with the USFWS is required.

National Historic Preservation Act (NHPA) 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. The EPA has evaluated its planned reissuance of the NPDES Permit for Mesa Verde National Park Wastewater Treatment Plant to assess this action's potential effects on any listed or eligible historic properties or cultural resources. The EPA does not anticipate any impacts on listed/eligible historic properties or cultural resources because this Permit is a renewal and will not be associated with any new ground disturbance or significant changes to the volume or point of discharge. During the public comment period, the EPA notified the State Historic Preservation Officer (SHPO) of the planned issuance of this NPDES Permit and request their input on potential effects on historic properties and the EPA's preliminary determination in this regard.

Miscellaneous

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

Permit and Statement of Basis drafted by:
Qian Zhang P.E., EPA Region 8, 8WD-CWW, 303-312-6267
October 23, 2018

Permit and Statement of Basis reviewed by:
Wastewater staff (8WD-CWW)
December 4, 2018

ADDENDUM:

The Permit and statement of basis were public noticed in The Durango Herald News on June 7, 2019. The 30 days public comment period closed on July 7, 2019. There were no public comments received. No response was received regarding the facility from the SHPO.

The EPA received the Section 401 Water Quality Certification on July 16, 2019 from CDPHE for this Permit.