

June 2017  
**FACT SHEET**  
**Authorization to Discharge under the**  
**National Pollutant Discharge Elimination System**  
**for the**  
**Cameron Trading Post**  
**NPDES Permit No. NN0021610**

Applicant Address: Cameron Trading Post  
P.O. Box 1796  
Sedona, Arizona 86339

Applicant Contact: Randy Sosin, Operator  
(928) 282-8528

Facility Address: Cameron Trading Post Wastewater Treatment Plant  
466 Highway 89A  
Cameron, Arizona 86020

Facility Contact: Josh Atkinson, Assistant General Manager  
(928) 679-2233

## **I. STATUS OF PERMIT**

Cameron Trading Post was issued a National Pollutant Discharge Elimination System (“NPDES”) Permit (No. NN0021610) on September 1, 2012, for its wastewater treatment lagoon facility, pursuant to the U.S. Environmental Protection Agency (“U.S. EPA”) regulations set forth in Title 40, Code of Federal Regulations (“CFR”) Part 122.21. The permit was effective August 23, 2007, through midnight, August 31, 2017. The permittee applied to U.S. EPA Region 9 for reissuance on March 16, 2017. The facility is on private land surrounded by the Navajo Nation and therefore, is not under the jurisdiction of the Indian tribe. However, the discharge is to waters of the United States and therefore U.S. EPA is the permitting authority. All the terms and conditions of the 2012 permit are in effect until the reissuance of a new permit. This fact sheet is based on information provided by the applicant through its application and discharge data submittal, along with the appropriate laws and regulations.

Pursuant to Section 402 of the Clean Water Act (“CWA”), the U.S. EPA is proposing issuance of the NPDES permit renewal to Cameron Trading Post (“permittee”) for the discharge of treated domestic wastewater to the Little Colorado River segment within the Navajo Nation, a water of the United States.

## **II. SIGNIFICANT CHANGES TO PREVIOUS PERMIT**

1. The proposed permit, although similar to the previous permit issued in 2012, introduces a different calculation for determining compliance with total ammonia. In addition,

measurements for temperature are required to be taken concurrently with ammonia and pH measurements.

2. The proposed permit includes a new requirement for submitting DMRs electronically through EPA's NetDMR system.

3. The proposed permit also includes a new requirement for submitting annual biosolids reports electronically using EPA's NPDES Electronic Reporting Tool ("NeT").

4. The proposed permit also includes a new requirement for developing an asset management program (AMP) to cover the treatment plant and collection system.

### **III. GENERAL DESCRIPTION OF FACILITY**

The Cameron Trading Post wastewater treatment facility (WWTF) is located off of Highway 89 in Cameron, on private land that is surrounded by the Navajo Nation reservation in Coconino County, Arizona, at latitude 35° 52' 37.8" North and longitude 111° 25' 01.4" West (Township 29N, Range 9E, Section 22). The facility services a full-time population equivalent of 660 comprising of a store, restaurant, lodge, gas station, post office, and nearby mobile homes, and receives only domestic sewage with a design flow rate of 0.07 million gallons per day ("MGD"). Based on information provided in the March 2017 permit renewal application, the facility's average discharge flows were 0.03 MGD, 0.03 MGD and 0.03 MGD in 2015, 2016 and 2017, respectively. The maximum daily flow rates were 0.03 MGD, 0.04 MGD and 0.04 MGD in 2015, 2016 and 2017, respectively. Peak flows reportedly occur during the busy tourist season in July and August. A lower flow capacity basis of 0.054 MGD was used in determining the permit limits in 2001, 2007 and 2012 permits. For consistency purposes, EPA continues to apply the 0.054 MGD design flow for this period cycle.

The facility includes a Parshall Flume and laser flow recorder to measure influent flow, a splitter box, three (3) activated sludge aeration tanks with each connected to a corresponding secondary clarifier and digester, two (2) sludge holding tanks, three (3) sludge drying beds, two (2) drying beds for turning semi-solid to solid sludge, and six (6) ultraviolet light disinfection units. Two activated sludge tanks have a capacity of 18,000 gallons while the third tank has a capacity of 30,000 gallons. Clarifiers are skimmed manually by turning a knob which lowers a bin to suck in floating waste. Secondary treated effluent flows off two sides of Clarifiers 1 and 2 with uneven weirs allowing effluent to flow off only the lower edge of each side, while the higher edge appeared dry. Clarifier 3 had V-notch weirs, providing for even flow distribution off the weirs.

Effluent from Clarifiers 1 and 2 are combined in an equalization tank which flows to Sand Filter Unit 1 while flow from Clarifier 3 is sent to Sand Filter Unit 2. Streams from the two sand filters flow separately into two sets of three ultraviolet disinfection units operating in series. The facility has the ability to manually chlorinate in case of prolonged UV failure or power failure. After UV disinfection, the two waste streams are combined. Compliance sampling for outfall 001 is conducted prior to this mixing. Samples are composited proportionally according to flow volumes from each of the two streams. The facility did not have an effluent flow meter installed for either stream or the combined effluent. Flow volume reported in the DMRs is reportedly from influent flow meter data.

### Sludge Handling

Solids from the 3 clarifiers are sent to their respective digesters. Digesters 1 and 2 are stand-alone units set in to the ground while Digester 3 is attached to the package treatment unit with activated sludge tank and clarifier 3. Once the digesters are full, they are emptied to their respective drying beds. Liquid leachate coming off the drying beds is sent back to the headworks. Once dry, solids are scrapped from the drying beds and temporarily stored off to the side of the beds in a separate bed. Sludge emptied from the drying beds are picked up and hauled off to a landfill in Flagstaff.

## **IV. DESCRIPTION OF RECEIVING WATER**

The discharge outfall is located approximately one third of a mile downstream of the facility and flows approximately 200 feet before its confluence with the Little Colorado River segment within the Navajo Nation, which is a water of the United States. Flow from the discharge was steady and created a consistent stream in an otherwise dry wash on the side of the riverbank. Although the outfall is somewhat secluded, evidence of animal and livestock activity was present in the vicinity of the discharge.

## **V. EFFLUENT CHARACTERISTICS**

The U.S. EPA, accompanied by Navajo Nation EPA's ("NNEPA") last conducted a compliance evaluation inspection (CEI) on May 10, 2012 and made the following observations:

1. Peak flows occur during the July/August busy season. The representative also indicated earlier in the year, liquids had to be hauled off in a septic truck due to wastewater volume exceeding capacity. He indicated that it was the first time the facility had hauled wastewater to be treated offsite.
2. No guard railings around aeration basins or digesters appeared to be a safety hazard for operators and others onsite.
3. The permittee did not have an effluent flow meter, but instead recorded total flow based on records from influent flow logs.
4. Tanks did not appear to receive cleaning regularly. Mild algal growth was prevalent in all clarifiers, including on the weirs and pipes and might adversely affect treatment directly or by providing habitat for further growth.
5. The facility did not have a redundant power source. If power went out, UV disinfection might become nonoperational. UV disinfection units appeared dirty resulting in indicator lights that were difficult to decipher.
6. Flat weirs on secondary clarifiers were not level resulting in uneven flow off tank. This uneven flow may result in higher tank discharge velocities and/or short-circuiting, upsetting the treatment design.
7. There was no single sample point for Outfall 001. Outfall 001 grab and composite samples were taken from two different sources and composited flow-proportionally. The facility does not have

a flow meter for either waste stream; therefore, the flow-proportioning was calculated based on design flow.

## **VI. BASIS OF PROPOSED PERMIT REQUIREMENTS**

Section 301(a) of the Clean Water Act (“CWA”) provides that the discharge of any pollutant to waters of the United States is unlawful except in accordance with a National Pollutant Discharge Elimination System (“NPDES”) permit. Section 402 of the Act establishes the NPDES program. The program is designed to limit the discharge of pollutants into waters of the United States from point sources [40 CFR 122.1(b)(1)] through a combination of various requirements including technology-based and water quality-based effluent limitations.

Sections 402 and 301(b)(1)(C) of the CWA require that the permit contain effluent limitations to meet water quality standards. Specifically, the regulation under 40 CFR 122.44(d) states that an NPDES permit must contain:

*“Water quality standards and State requirements: any requirements in addition to or more stringent than promulgated effluent limitations guidelines or standards under Sections 301, 304, 306, 307, 318 and 405 of CWA necessary to:*

*(1) Achieve water quality standards established under section 303 of the CWA, including State narrative criteria for water quality.”*

Section 40 CFR 122.44(d)(i) states the following:

*“Limitations must control all pollutants or pollutant parameters (either conventional, nonconventional, or toxic pollutants) which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality.”*

### **A. Navajo Nation Surface Water Quality Standards**

In accordance with 40 CFR 122.44(d), the need for discharge limitations for all pollutants that may impact applicable water quality criteria and water quality standards must be evaluated. As part of this evaluation, discharge limitations are based on application of the water quality standards. USEPA approved the 1999 Navajo Nation Surface Water Quality Standards (“NNSWQS”), on March 23, 2006. The NNSWQS were revised in 2007 and approved by the USEPA on March 26, 2009. A 2010 *draft* NNSWQS revision has been under review by USEPA. The approved 1999 NNSWQS, the 2007 revision and the 2010 *draft* revision will be used on a best professional judgment (“BPJ”) basis for purposes of developing water quality based effluent limitations.

### **B. Applicable Technology-Based Effluent Limitations, Water Quality-Based Effluent Limitations (“WQBELs”) and BPJ**

Technology-based effluent limitations require minimum levels of treatment based on currently available treatment technologies. Section 301 of the CWA established a required performance level, referred to as “secondary treatment”, that all POTWs were required to meet by

July 1, 1977. Federal secondary treatment effluent standards for POTWs are contained in Section 301(b)(1)(B) of the CWA. Implementing regulations for Section 301(b)(1)(B) are found at 40 CFR Part 133. The CWA requires POTWs to meet performance-based requirements based on available wastewater treatment technology. These technology-based effluent limits apply to all municipal wastewater treatment plants, and identify the minimum level of effluent quality attainable by secondary treatment in terms of Five-Day Biochemical Oxygen Demand (“BOD<sub>5</sub>”) and Total Suspended Solids (“TSS”). The requirements contained in the draft permit are necessary to prevent violations of applicable treatment standards.

## **VII. DETERMINATION OF NUMERICAL EFFLUENT LIMITATIONS**

Typical pollutants of concern in untreated and treated domestic wastewater include ammonia nitrate, oxygen demand, pathogens, temperature, pH, oil and grease, and solids. US EPA proposes the following provisions and effluent discharge limitations for flow, BOD<sub>5</sub>, TSS, *E. coli*, total dissolved solids (“TDS”), TRC and ammonia taken concurrent with temperature and pH measurements. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge by prior to entry into the receiving water.

### **A. Federal Secondary Treatment Effluent Discharge Limitations**

The proposed permit contains discharge limitations for BOD<sub>5</sub>, TSS and priority toxic pollutants. For both BOD<sub>5</sub> and TSS, the arithmetic means of values, by weight, for effluent samples collected in a period of 30 consecutive calendar days shall not exceed 15 percent of the arithmetic mean of values, by weight, for influent samples collected at approximately the same times during the same period. These BOD<sub>5</sub> and TSS limits are identical to those of the previous permit.

Discharge Limitations					
Discharge Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Monitoring Frequency
Flow <sup>1</sup>	GPD	-- <sup>2</sup>	n/a	-- <sup>2</sup>	Instantaneous
BOD <sub>5</sub> <sup>3</sup>	mg/l	30	45	--	Monthly
	kg/day	6.08	9.13	--	
TSS <sup>3</sup>	mg/l	30	45	--	Monthly
	kg/day	6.08	9.13	--	
Priority Pollutants <sup>4</sup>	µg/l	n/a	n/a	-- <sup>2</sup>	Once/1 <sup>st</sup> Quarter during Year 5

#### **NOTES:**

1. No flow limit is set at this time but influent and effluent flows must be monitored and reported. The monitoring frequency is once/month.
2. Monitoring and reporting required. No limitation is set at this time.
3. Under 40 CFR Section 122.45(f), mass limits are required for BOD<sub>5</sub> and TSS. The concentration limits for BOD<sub>5</sub> and TSS shall not exceed a monthly average of 30 mg/l and a weekly average of 45 mg/l. The mass limits are calculated based upon the 0.054 MGD design flow.

4. Priority Pollutants: During Year 5 of the permit, the permittee shall monitor for the full list of priority pollutants in the Code of Federal Register (CFR) at 40 CFR Part 423, Appendix A. No limit is set at this time. Should the results reveal levels below the Navajo Nation Surface Water Quality Standards and EPA's National Water Quality Criteria for priority pollutants, monitoring will no longer be required for the remainder of the permit cycle.

**B. Water Quality Based Effluent Limitations ("WQBELs")**

Water quality-based effluent limitations, or WQBELS, are required in NPDES permits when the permitting authority determines that a discharge causes, has the reasonable potential to cause, or contributes to an excursion above any water quality standard. [40 CFR 122.44(d)(1)].

When determining whether an effluent discharge causes, has the reasonable potential to cause, or contributes to an excursion above narrative or numeric criteria, the permitting authority shall use procedures which account for existing controls on point and non point sources of pollution, the variability of the pollutant or pollutant parameter in the effluent, the sensitivity of the species to toxicity testing (when evaluating whole effluent toxicity) and where appropriate, the dilution of the effluent in the receiving water [40 CFR 122.44 (d)(1)(ii)].

EPA evaluated the reasonable potential to discharge toxic pollutants according to guidance provided in the *Technical Support Document for Water Quality-Based Toxics Control* (TSD) (Office of Water Enforcement and Permits, U.S. EPA, March 1991) and the *U.S. EPA NPDES Permit Writers Manual* (Office of Water, U.S. EPA, December 1996). These factors include:

1. Applicable standards, designated uses and impairments of receiving water
2. Dilution in the receiving water
3. Type of industry
4. History of compliance problems and toxic impacts
5. Existing data on toxic pollutants - Reasonable Potential analysis

**1. Applicable standards, designated uses and impairments of receiving water**

The designated uses of the receiving water (Little Colorado River) as defined by the 2007 NNSWQS and *draft* 2010 NNSWQS revisions, are domestic water supply, primary and secondary human contact, fish consumption, aquatic & wildlife habitat, and livestock watering (Table 205.1, page 20).

**2. Dilution in the receiving water**

Discharge Outfall 001 is to the Little Colorado River, which may have no natural flow during certain times of the year. Therefore, no dilution of the effluent has been considered in the development of water quality based effluent limits applicable to the discharge.

### 3. Type of industry

Typical pollutants of concern in untreated and treated domestic wastewater include ammonia, nitrate, oxygen demand, pathogens, temperature, pH, oil and grease, and solids. Chlorine may also be of concern due to treatment plant disinfection operations and therefore, dechlorination may be necessary to minimize impact on water quality based effluent limits.

### 4. History of compliance problems and toxic impacts

Review of the discharge monitoring reports (DMRs) from January 1, 2014 to March 31, 2017 shows that the facility achieves consistent compliance with the NPDES permit limits. However, EPA notes many instances of late submittals ranging from 8 days to 36 days in 2014, 2105 and 2016.

### 5. Existing data on toxic pollutants

No toxic pollutant was found to be above detectable levels in the priority pollutant scan.

### C. Rationale for WQBELs

Effluent Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Monitoring Frequency
Total Residual Chlorine <sup>1</sup>	µg/l	--	--	11	Monthly
<i>E. coli</i> <sup>2</sup>	CFU/100 ml	126	--	235	Monthly
Ammonia <sup>3</sup> (as N)	mg/l	--	--	--	Monthly
AIR <sup>3</sup>					Monthly
TDS <sup>4</sup>	mg/l	--	--	--	Quarterly
pH <sup>5</sup>	std unit	between 6.5 to 9.0			Monthly
Temperature <sup>6</sup>	deg F	--	--	--	Monthly

#### NOTES:

1. **Total Residual Chlorine.** If chlorination is used for disinfection of the effluent, dechlorination is also necessary prior to discharge. No single sample shall exceed 11 µg/l based on the NNSWQS for protection of aquatic & wildlife habitat and livestock watering (Table 206.1, page 32 of the 2007 NNSWQS and 2010 *draft* NNSWQS revisions.) The monitoring frequency has been changed to monthly.
2. ***E. coli*.** In the proposed permit, the monthly geometric mean of *E. coli* bacteria shall not exceed 126/100 ml and 576/100 ml as a single sample maximum. The limits reflect the more stringent standards for protection of domestic and primary human contact (page 14 of 2007

NNSWQS and 2010 *draft* NNSWQS revisions.)

3. **Ammonia (as N) and Ammonia Impact Ratio (“AIR”).** Presence of ammonia in untreated and treated domestic wastewater indicates that there is a reasonable potential for levels in the effluent to cause or contribute to an excursion above the WQS. In accordance with the NNSWQS for protection of aquatic and wildlife habitat, the proposed permit contains effluent limitations for total ammonia. The ammonia limits are temperature and pH dependent and are listed in Table 206.2 and Table 206.3 (pages 36-37) of 2007 NNSWQS and *draft* 2010 NNSWQS revisions. They are also provided in Appendices A and B of the permit. The monitoring frequency is once per month, consistent with the previous permit.

Because ammonia criteria are pH and temperature-dependent, the permittee is required to calculate an AIR. The AIR is calculated as the ratio of the ammonia value in the effluent and the applicable ammonia standards as determined by using pH data to derive an appropriate value from the ammonia criteria table in Appendix C of the permit. The AIR limitation has been established as a monthly average of 1.0, equivalent to the standard. The permittee is required to report maximum daily and average monthly ammonia (as N) concentrations in addition to an average monthly AIR.

4. **Total Dissolved Solids.** No limit is proposed but the regulations at 40 CFR 122.44(i) set forth requirements for monitoring as determined to be necessary. This requirement is consistent with the previous permit.
5. **pH.** To ensure adherence to the minimum and maximum pH levels designated by the Navajo Nation for the receiving water, monthly pH monitoring is required in the permit for protection of domestic, primary and secondary human contact, and aquatic & wildlife habitat and livestock watering (page 15 of 2007 NNSWQS and 2010 *draft* NNSWQS revisions.) In order to support the Navajo Nation’s established ammonia standards, which vary with the pH of the effluent, pH monitoring is to be performed concurrently with ammonia monitoring.
6. **Temperature.** Also to support the Navajo Nation’s established ammonia standards and their dependence on temperature, monthly monitoring for temperature is to be performed concurrently with ammonia monitoring.

## **VIII. REPORTING**

The proposed permit requires discharge data obtained during the previous three months to be summarized on monthly DMR forms and reported quarterly. If there is no discharge for the month, report “C” in the No Discharge box on the DMR form for that month. The proposed permit includes a new requirement for electronically submitting compliance monitoring data by July 28, 2016, using the electronic reporting tools (NetDMR) provided by EPA Region 9. These reports are due January 28, April 28, July 28, and October 28 of each year. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the U.S. EPA and the Navajo Nation EPA.

## **IX. GENERAL STANDARDS**

The proposed permit sets general standards that are narrative water quality standards contained in the Navajo Nation Water Quality Standards, Section 203. These general standards are set forth in Section B. General Discharge Specifications of the permit.



## **X. PERMIT REOPENERS**

At this time, there is no reasonable potential to establish any other water quality based limits. Should any monitoring indicate that the discharge causes, has the reasonable potential to cause, or contributes to excursion above a water quality criterion, the permit may be reopened for the imposition of water quality-based limits and/or whole effluent toxicity limits. The proposed permit may be modified, in accordance with 40 CFR 122 and 124, to include appropriate conditions or effluent limits, monitoring, or other conditions to implement new regulations, including U.S. EPA-approved new Tribal water quality standards; or to address new information indicating the presence of effluent toxicity or the reasonable potential for the discharge to cause or contribute to exceedences of water quality standards.

In accordance with 40 CFR 122.44(c), EPA may promptly modify or revoke and reissue any permit issued to a treatment works treating domestic sewage (including “sludge only facilities”) to incorporate any applicable standard for sewage sludge use or disposal promulgated under section 405(d) of the CWA, if the standard for sewage sludge use or disposal is more stringent than any requirements for sludge use or disposal in the permit, or controls a pollutant or practice not limited in the permit.

## **XI. SEWAGE SLUDGE REQUIREMENTS**

The proposed permit includes a requirement for submitting a report 60 days prior to disposal of sewage sludge. The proposed permit also includes a new requirement that goes into effect December 21, 2016, for submitting reports electronically using EPA’s NPDES Electronic Reporting Tool (“NeT”). For example, the annual report for calendar year 2016, which is due by February 19, 2017, must be submitted electronically. The report shall discuss an estimate of the quantity of sewage sludge currently on site, and a projection of when sewage sludge will next be removed. Ninety (90) days prior to removing sewage sludge for use or disposal, the permittee is required to submit a plan describing the quantity of sewage sludge to be removed, mechanisms for removing, and a proposed sampling plan for pollutants regulated under the use or disposal option being selected. Upon approval of this plan by U.S. EPA and NNEPA, the permittee will have the sewage sludge removed as described. The permit also requires compliance with all applicable requirements of Section 405(d) of the CWA, and 40 CFR 258 (for sewage sludge sent to a municipal landfill) and 503 (for sewage sludge placed in a sludge-only surface disposal site, land applied as fertilizer, used in land reclamation, or incinerated).

## **XII. OTHER CONSIDERATIONS UNDER FEDERAL LAW**

### **A. Anti-Degradation**

USEPA’s antidegradation policy at 40 CFR Section 131.12 and the NNSWQS require that existing water uses and level of water quality necessary to protect the existing uses be maintained. As described in this fact sheet, the permit establishes effluent limits and monitoring requirements to ensure that all applicable water quality standards are met. The permit does not include a mixing zone; therefore, these limits will apply at the end of the pipe without consideration of dilution in the receiving water. Therefore, due to the low levels of toxic pollutants present in

the effluent, the high level of treatment being obtained, and water quality-based effluent limitations, it is not expected that the discharge will adversely affect receiving water bodies.

**B. Anti-Backsliding**

Section 402(o) of the CWA prohibits the renewal or reissuance of an NPDES permit that contains effluent limits less stringent than those established in the previous permit, except as provided in the statute. The proposed permit is a renewal and therefore does not allow backsliding.

**C. Threatened and Endangered Species and Critical Habitat**

**1. Background:**

Section 7 of the Endangered Species Act (ESA) of 1973 requires Federal agencies such as EPA to ensure, in consultation with the U.S. Fish and Wildlife Service (FWS), that any actions authorized, funded or carried out by the 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.

Since the issuance of NPDES permits by EPA is a Federal action, consideration of a permitted discharge and its effect on any federally-listed species is appropriate. The proposed NPDES permit authorizes the discharge of treated domestic wastewater to the Little Colorado River segment within the Navajo Nation, waters of the United States.

The information below is listed in the Navajo Nation's Department of Fish & Wildlife Natural Heritage Program (NHP) database. <http://www.nndfw.org/> The FWS has deferred all of its survey and information collection in the Navajo Nation to the Navajo Nation NHP. EPA has yet to receive new species information requested from the NHP on March 28, 2017. Using the above NHP database, EPA has found no identified federally-listed threatened or endangered species known to occur on or near the project in Cameron, Coconino County, Arizona.

**2. EPA's Finding:**

This permit authorizes the discharge of treated wastewater in conformance with the federal secondary treatment regulations and the Navajo Nation Surface Water Quality Standards. These standards are applied in the permit both as numeric and narrative limits. The standards are designed to protect aquatic species, including threatened and endangered species, and any discharge in compliance with these standards should not adversely impact any threatened and endangered species.

EPA believes that effluent released in compliance with this permit will have no effect on any federally-listed threatened or endangered species or its critical habitat that may be present in the vicinity of the discharge. The treatment facility has been in existence for some time, and no new construction or modifications will be made to it due to the proposed NPDES permit. Therefore, no requirements specific to the protection of endangered species are proposed in the permit. EPA may decide that changes to the permit may be warranted based on receipt of new information. A re-opener clause has been included should new information become available

to indicate that the requirements of the permit need to be changed.

**D. Impact to National Historic Properties**

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effect of their undertakings on historic properties that are either listed on, or eligible for listing on, the National Register of Historic Places. Pursuant to activity authorized by this NPDES permit no new construction or disturbance of land is anticipated. Therefore, pursuant to the NHPA and 36 CFR §800.3(a)(1), EPA is making a determination that issuing this proposed NPDES permit does not have the potential to affect any historic properties or cultural properties. As a result, Section 106 does not require EPA to undertake additional consulting on this permit issuance.

**E. Consideration of Environmental Justice (EJ) Impact**

EPA has conducted a screening level evaluation of the potential impact of this facility and other permitted facilities within the immediate area on local residents through use of USEPA's EJSCREEN tool. Specifically, EPA used EJSCREEN to identify facilities near the Cameron Trading Post facility that could pose risk to local residents through discharge of environmental contaminants. EPA has also evaluated whether demographic characteristics of the population living in the vicinity of the facility indicate that the local population might be particularly susceptible to such environmental risks. The results show that, at the time of this analysis conducted on May 8, 2017, the area in which the facility is located was above the 94<sup>th</sup> percentile nationally for ozone. The EJSCREEN analysis of demographic characteristics of the community living near the facility indicates the local population may be at relatively higher risk if exposed to environmental contaminants than the national population. Demographic characteristics that showed potentially sensitive scores were a high proportion of minority and low income population and population with less than high school education.

EPA also considers the characteristics of the wastewater treatment facility operation and discharges, and whether those discharges, in combination with discharges from local ozone sources, pose exposure risks that the NPDES permit needs to further address. The Cameron Trading Post facility is unlikely to discharge any noticeable ozone. EPA finds no evidence to indicate the wastewater facility discharge poses a significant risk to local residents. EPA concludes that the facility is unlikely to contribute to any EJ issues. Furthermore, EPA believes that by implementing and requiring compliance with the provisions of the Clean Water Act, which are designed to ensure full protection of human health, the permit is sufficient to ensure the facility discharges do not cause or contribute to human health risk in the vicinity of the wastewater facility.

**F. Asset Management**

40 CFR 122.41(e) requires permittees to properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of this permit. Asset management planning provides a framework for setting and operating quality assurance procedures and ensuring the permittee has sufficient financial and technical resources to continually maintain a targeted level of service. The proposed NPDES permit establishes asset management requirements to ensure compliance with the

provisions of 40 CFR 122.41(e).

### **XIII. ADMINISTRATIVE INFORMATION – PUBLIC NOTICE, PUBLIC COMMENTS AND REQUESTS FOR PUBLIC HEARINGS**

In accordance with 40 CFR 124.10, public notice shall be given by the U.S. EPA Director that a draft NPDES permit has been prepared by mailing a copy of the notice to the permit applicant and other Federal and State agencies, and through U.S. EPA Region 9 website at: <http://www.epa.gov/region09/water/npdes/pubnotices.html>. The public notice shall allow at least 30 days for public comment on the draft permit.

In accordance with 40 CFR 124.11 and 12, during the public comment period, any interested person may submit written comments on the draft permit, and may request a public hearing if no hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. In accordance with 40 CFR 124.13, all persons must raise all reasonably ascertainable issues and submit all reasonably available arguments supporting their position within thirty (30) days from the date of the public notice. Comments may be received either in person or mailed to:

U.S. Environmental Protection Agency, Region 9  
NPDES Permits Section (WTR-2-3)  
Attn: Linh Tran  
75 Hawthorne Street  
San Francisco, CA 94105  
Telephone: (415) 972-3511

Interested persons may obtain further information, including copies of the draft permit, fact sheet/statement of basis, and the permit application, by contacting Linh Tran at the U.S. EPA address, above. Copies of the administrative record (other than those which U.S. EPA maintains as confidential) are available for public inspection between 8:00 a.m. and 4:30 p.m., Monday through Friday (excluding federal holidays).

In accordance with 40 CFR 124.12, the U.S. EPA Director shall hold a public hearing when, on the basis of requests, a significant degree of public interest in the draft permit exists. The Director may also hold a public hearing when, for instance, such a hearing might clarify one or more issues involved in the permit decision. Public notice of such hearing shall be given as specified in 40 CFR 124.10.