MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Environmental Assessment

Water Protection Bureau

Name of Project: Manhattan Water Reclamation Facility

Location of Project: 250 Bettingill Rd Manhattan, MT

City/Town: Manhattan **County**: Gallatin

Type of Project: Montana Pollutant Discharge Elimination System Renewal for a Publicly Owned Treatment Works

Description of Project:

The Montana Department of Environmental Quality (DEQ) has proposed to renew the Montana Pollutant Discharge System (MPDES) permit for the Town of Manhattan (Manhattan) Water Reclamation Facility (WRF). The WRF is a 2008-built biological nutrient removal (BNR) plant using a hybrid activated sludge-fixed film system. This publicly owned treatment works discharges to Dita Ditch. The average daily design flow is 0.37 million gallons per day (mgd) and the 2017 total population served was 2,350 (including the Amsterdam-Churchill contribution.

Agency Action and Applicable Regulations:

The proposed action is to renew the MPDES permit for another five-year cycle.

ARM Title 17, Chapter 30, Subchapter 2 – Water Quality Permit Application and Annual Fees.
ARM Title 17, Chapter 30, Subchapter 5 – Mixing Zones in Surface and Ground Water.
ARM Title 17, Chapter 30, Subchapter 6 – Surface Water Quality Standards.
ARM Title 17, Chapter 30, Subchapter 7 – Nondegradation of Water Quality.
ARM Title 17, Chapter 30, Subchapter 12 – MPDES Effluent Limitations and Standards, Standards of Performance, and Treatment Requirements
ARM Title 17, Chapter 30, Subchapter 13 – MPDES Permits
Montana Water Quality Act, MCA 75-5-101 *et. seq*.

Summary of Issues:

The average daily design flow for the Manhattan WRF has remained at 0.37 mgd. New effluent limitations are established for nutrients (total nitrogen and phosphorus). Manhattan is in the midst of a Preliminary Engineering Review (PER) to invest in additional facility upgrades – these planned upgrades were not included as part of this permit renewal.

Affected Environment & Impacts of the Proposed Project:

Y = Impacts may occur.
N = Not present or No Impact will likely occur.

IMPACTS ON THE PHYSICAL ENVIRONMENT	
RESOURCE	[Y/N] POTENTIAL IMPACTS AND MITIGATION MEASURES
1. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: Are soils present which are fragile, erosive, susceptible to compaction, or unstable? Are there unusual or unstable geologic features? Are there special reclamation considerations?	[N] No impact will likely occur due to no change to geology and soils.
2. WATER QUALITY, QUANTITY AND DISTRIBUTION: Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?	[N] No impact will likely occur. Effluent limitations will protect designated and existing uses of the receiving water.
3. AIR QUALITY: Will pollutants or particulates be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?	[N] Not present.
4. VEGETATION COVER, QUANTITY AND QUALITY: Will vegetative communities be significantly impacted? Are any rare plants or cover types present?	[N] No impact will likely occur. No changes to land cover or land use are planned for the Manhattan WRF as part of this permit renewal.
5. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS: Is there substantial use of the area by important wildlife, birds or fish?	[N] No impact will likely occur. Effluent limitations will protect aquatic/wildlife uses.
6. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern?	[N] No impact will likely occur. No changes to land cover or land use are planned for the Manhattan WRF as part of this permit renewal. Effluent limitations will protect aquatic/wildlife uses.
7. SAGE GROUSE EXECUTIVE ORDER: Is the project proposed in core, general or connectivity sage grouse habitat, as designated by the Sage Grouse Habitat Conservation Program (Program) at: http://dnrc.mt.gov/divisions/cardd/sage-grouse? If yes, did the applicant attach documentation from the Program showing compliance with Executive Order 12-2015 and the Program's recommendations? If so, attach the documentation to the EA and address the Program's recommendations in the permit. If project is in core, general or connectivity habitat and the applicant did not document consultation with the Program, refer the applicant to the Sage Grouse Habitat Conservation Program.	[N] DEQ has verified the facility is not within sage grouse habitat, and therefore does not need Program review.
8. HISTORICAL AND ARCHAEOLOGICAL SITES: Are any historical, archaeological or paleontological resources present?	[N] No impact will likely occur. No known historical or archaeological sites present.
9. AESTHETICS: Is the project on a prominent topographic feature? Will it be visible from populated or scenic areas? Will there be excessive noise or light?	[N] No impact will likely occur.

IMPACTS ON THE PHYSICAL ENVIRONMENT	
10. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project? Will new or upgraded powerline or other energy source be needed)	[N] No impact will likely occur. No increased energy needs are currently planned as part of this permit renewal.
11. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: Are there other activities nearby that will affect the project?	[N] Not present.

IMPACTS ON THE HUMAN ENVIRONMENT	
RESOURCE	[Y/N] POTENTIAL IMPACTS AND MITIGATION MEASURES
12. HUMAN HEALTH AND SAFETY: Will this project add to health and safety risks in the area?	[N] No impact will likely occur.
13. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: Will the project add to or alter these activities?	[N] No impact will likely occur.
14. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: Will the project create, move or eliminate jobs? If so, estimated number.	[N] No impact will likely occur.
15. LOCAL AND STATE TAX BASE AND TAX REVENUES: Will the project create or eliminate tax revenue?	[N] Future upgrades to the facility may cause increase in taxes. No upgrades are scheduled as part of this permit renewal.
16. DEMAND FOR GOVERNMENT SERVICES: Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?	[N] Short-term construction traffic increase may occur during facility upgrades or sewer system expansion. No facility upgrades are included as part of this permit renewal.
17. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect?	[N] No impact will likely occur. No zoning changes are likely to be required.
18. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?	[N] Not present at the WRF. Recreation is not likely to occur on Dita Ditch. Permit conditions are protective of recreation that may occur downstream.
19. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: Will the project add to the population and require additional housing?	[N] No impact will likely occur.
20. SOCIAL STRUCTURES AND MORES: Is some disruption of native or traditional lifestyles or communities possible?	[N] No impact will likely occur.
21. CULTURAL UNIQUENESS AND DIVERSITY: Will the action cause a shift in some unique quality of the area?	[N] No impact will likely occur.
22. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:	[N] Not present.

IMPACTS ON THE HUMAN ENVIRONMENT	
RESOURCE	[Y/N] POTENTIAL IMPACTS AND MITIGATION MEASURES
23(a). PRIVATE PROPERTY IMPACTS: Are we regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category.) If not, no further analysis is required.	[N] Not present.
23(b). PRIVATE PROPERTY IMPACTS: Is the agency proposing to deny the application or condition the approval in a way that restricts the use of the regulated person's private property? If not, no further analysis is required.	[N] Not present.
23(c). PRIVATE PROPERTY IMPACTS: If the answer to 23(b) is affirmative, does the agency have legal discretion to impose or not impose the proposed restriction or discretion as to how the restriction will be imposed? If not, no further analysis is required. If so, the agency must determine if there are alternatives that would reduce, minimize or eliminate the restriction on the use of private property, and analyze such alternatives. The agency must disclose the potential costs of identified restrictions.	[N] Not present.

24. Description of and Impacts of other Alternatives Considered:

MPDES renewal permit issuance is not predicted to have any additional impacts. Permit denial would cause extreme hardship on the municipality and render it unable to continue sewer service to resident and businesses.

25. Summary of Magnitude and Significance of Potential Impacts:

None.

26. Cumulative Effects:

None.

27. Preferred Action Alternative and Rationale:

The preferred action is to reissue the MPDES permit. This action is preferred because the MPDES permitting program provides the regulatory mechanism for protecting water quality by enforcing the terms of the facility's permit.

Recommendation for Further Environmental Analysis:

[ ] EIS [ ] More Detailed EA [X] No Further Analysis

Rationale for Recommendation: An EIS is not required under the Montana Environmental Policy Act (MEPA) because the project lacks significant adverse effects to the human and physical environment.

28. Public Involvement:

    A 30-day public comment period will be held.

29. Persons and agencies consulted in the preparation of this analysis:

    Randy Lynch, Plant Manager, and Robert Seamons, Engineer, Town of Manhattan (2017)
    Mayor Glen Clements, Lead Operator, Town of Manhattan (2020/2021)

EA Prepared By:

Christine Weaver March 2021

Approved By:

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Jon Kenning, Chief Date
Water Protection Bureau