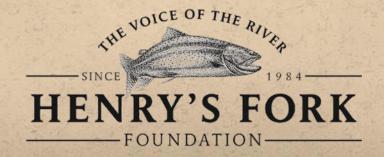
# City of Ashton Wastewater Treatment Plant Receiving Water Body Assessment

Henry's Fork Watershed Council March 10, 2015

Henry's Fork Foundation and City of Ashton



### **Outline**

- 1. Background
- 2. Regulatory issue
- 3. Resource issue
- 4. Why HFF?
- 5. Project area
- 6. Project goals
- 7. Assessment plan
- 8. Request of HFWC



### Background

- January 2015: Mayor Stronks asked Ashton residents to write legislators about wastewater treatment issue
- City of Ashton has incurred substantial water and sewer infrastructure debt:
  - 2006 \$2.5 million to upgrade the wastewater system
  - 2010 \$3.5 million to upgrade drinking water system
  - 2014 \$2 to \$4 million projected to upgrade wastewater system by
     2019



Public works infrastructure is becoming a greater financial burden for rural communities, including Ashton.





- \$6 million debt for water and wastewater
- 1,129 residents
- 500 households
- \$12,000 of debt per household
- 27.5% of households comprised of seniors
- \$38,000 Median annual household income

### Regulatory Issue: Documentation

- City issued National Pollution Discharge Elimination System (NPDES) permit for WWTP in 2014
  - Antidegradation Analysis, Step Two: Alternatives Analysis and Social and Economic Justification, dated January 9, 2013
  - Draft Section 401 Water Quality Certification for Draft NPDES Permit, dated April 15, 2013
  - USEPA Revised Fact Sheet on Draft NPDES Permit #ID0023710 (for public comment period beginning May 7, 2013)
  - Response by City of Ashton to draft Section 401 Water Quality Certification and draft NPDES Permit, dated July 8, 2013
  - Response to Comments on the Draft NPDES Permit for the City of Ashton, by USEPA, January 2014
  - Authorization to Discharge Under the NPDES, City of Ashton, Permit No. ID0023710, 28 January 2014

### Regulatory Issue

- IDEQ has designated receiving body (swale) as supporting:
  - Salmonid spawning (implies early life stages present)
  - Primary contact recreation (swimming, possibility of ingestion)
  - Cold-water biota
- Meeting ammonia standard is primary reason for high cost of treatment upgrade
- City of Ashton claims that receiving body is an intermittent swale that supports none of these uses
- WWTP discharges only January-April
- Existing data (from IDEQ):
  - Two E. coli tests (August 2011)
  - Water temperature (August 22-29, 2011)
  - "BURP Lite" (August 2011)
  - Electrofishing report (October 3, 2013)
- We also have chemistry data from Discharge Monitoring Reports

#### Resource Issue

- Henry's Fork fishery worth ~\$50 million
- Fremont County first in state for economic value of recreational fishing
- HF from Warm River to Ashton Dam protected for:
  - Salmonid spawning
  - Primary contact recreation
  - Cold-water biota



- Does receiving body for Ashton WWTP discharge merit the same protection?
- Do the resources at stake justify the cost to City?

# Why is Henry's Fork Foundation

- HFF supports local economic development, while protecting fish, water, and aquatic resources, e.g.,
  - Hydroelectric power
  - Irrigated agriculture
- HFF emphasizes the resource, not the regulation
- Unnecessary regulation causes public skepticism of environmental regulations and agencies
- HFF provides technical assistance to agencies and other NGOs; why not the City of Ashton?
- Viable local community desirable
- Selfish reason: We're Ashton ratepayers, too!

## Project Area



Discharge point



EPA photo, Sept. 2013 Plant not discharging



Effluent discharge point, March 9, 2015 Discharge rate: 70 gallons per minute (0.16 cfs)



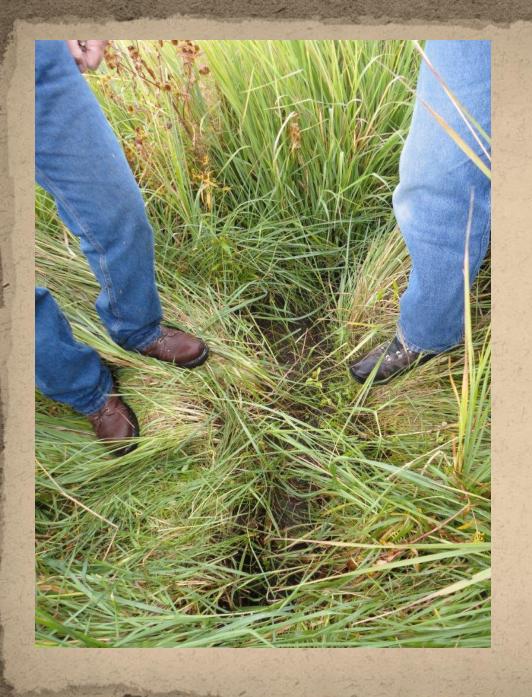
Water originating in storm-water basin upstream of effluent discharge point flows (right to left) through weir.



Close-up of weir in September 2013.



Confluence of receiving body and 1 gpm spring Location of compliance sampling point



1 gpm spring (actually dry) in September 2013.

"Perennial" is a misnomer.



Receiving body during January 2015 (WWTP discharging).



Receiving body on March 9, 2015 (WWTP discharging).

### Goals of Assessment

Provide data and analysis of sufficient quantity and quality to assess receiving body:

- 1. Hydrology (intermittent vs. perennial)
- 2. Presence/absence of fish (if, when, where, species)
- 3. Evidence of aquatic life (if, when, where, type?)



### Assessment Plan

- 1. Hydrography
  - Document (GPS and photos) entire "swale-shed" and spatial and temporal relationships among discharge, storm runoff, springs, etc.
- 2. Hydrology
  - Quantify flow with pressure transducers and field measurements to develop stage-discharge (2 years); record temperature
- 3. Channel geomorphology
  - Cross sections and longitudinal surveys, bulk substrate composition
- 4. Vegetation
  - Plant species composition: aquatic, riparian, wetland, terrestrial
- 5. Aquatic macroinvertebrates
  - Presence, absence, species?
- 6. Fish
  - Electrofish several times per year, especially during discharge period and at times when early life stages might be present

# Request to Henry's Fork Watershed Council

- Watershed Integrity Review and Evaluation (WIRE) endorsement
- Additional suggestions and assistance?

