



**Minutes of  
 June 13, 2007 Meeting  
 Littleton/Englewood WWTP**

In Attendance:

Mary Gardner	L/E WWTP
Sharon Davis	Metro Water Reclamation District
Claudia Cummins	Aurora Water
Ginny Johnson	Colorado Springs Utilities
Andrew Neuhart	WQCD
Dave Meyer	Westminster
Dennis Schump	Greeley
Nancy Keller	Pueblo
Mike Bittner	Silverthorne/Dillon
Tim Woodard	Westminster
Mary Fabisiak	Westminster
Richard Leger	Aurora Water
Stu Fonda	Littleton/Englewood
Andrew Ross	WQCD
Dave Akers	WQCD
Paul Grundemann	Centennial Water
Steve Gunderson	WQCD
Lesa Julian	Broomfield
Dennis Stowe	Littleton/Englewood
Blair Corning	SACWSD
Paul Ferraro	Ferraro Associates, Inc.

**I. WQCD Activities, Steve Gunderson, Division Director (CWQCD)**

Steve Gunderson updated the Council on a number of issues facing the WQCD since his last visit in December 2006. He will return again in November 2007 to continue to have dialogue with the Council.

He thanked the Council for the help and support they gave the Division on many issues. He also mentioned that Martha Rudolph is his boss now that she is in charge of the Environmental Programs at CDPHE.

Patti Wells, Denver Water, will replace Martha Rudolph on the WQCC.

Steve will mail the new organization chart to Nancy and Paul F. (It is attached.)

The Drinking Water Program regarding establishing regulations has been transferred to the CWQCC from the Board of Health.

The Clean Water and Drinking Water Program Managers meet on a regular basis to coordinate efforts. The Division has a number of programs that function as a matrix organization.

Issues:

- Coal Bed Methane Diversions - site specific vs. statewide general permits to be used?
- EPA does not want to receive DMRs any more.
- Biosolids legislation next year.
- Spills - EPA wants spills in basements to be reported to them.
- No state wetlands program.
- Basic standards concerns.
- State WQ policies being reviewed.

Council concerns discussed:

- EPA working on ammonia, more stringent
- Inspection Policy.

## **II. Baseline Monitoring Frequency, Andrew Neuhart (CWQCD)**

Andrew Neuhart gave an overview of the Monitoring Policy that he has revised.

- Updated Monitoring Policy for Domestic.
- Received input from many organizations.
- Added industrial and groundwater and a number of new parameters.
- Reduced monitoring requirements based on performance vs. design flows.
- Ambient monitoring is not a requirement to get reduced monitoring requirements; extra reduction if ambient monitoring is done.
- Design flow of facility used except if actual flows do not change much during the permit cycle. This is being used. If the permits are tiered, then the monitoring requirements are tiered too.
- It is a policy and that is where the Division starts.
- Comment period - positive comments received.
- CWQCD website - draft permits/draft policies are posted.

Council members comments:

- Tables - composite vs. a grab sample - same parameters need to be grab not composite. Cost increase since labs having to go to 7 days vs. 5 day lab operations for E coli vs. fecal.
- E Coli monitoring - Pueblo 3 day lab would have to go to 5 days

### III. Other Policies Under Review, Andrew Ross/Dave Akers (CWQCD)

Eighteen to 19 policies signed by Paul Ferraro as Division Director 18-20 years ago are going to be reviewed over the next two years.

- Andy will attend the July meeting.
- Will submit draft language to the Council before the July meeting.
- The Fecal Policy is to be changed to include E Coli.
- The following policies are to be revised:
  - Allocation of Assimilative Capacity
  - Temperature implementation
  - Antidegradation alternatives analysis

### IV. Updated Council Website / Member Certificates

Paul Ferraro showed the members the updated Council website. The original one is over five years old and the logo is over 15 years old. The website was revised by Paul Ferraro and posted by Jeannie Bowser. Mary Gardner helped with the new logo and letterhead. The members were pleased with the new website and agreed to have Paul add a search feature. On the monthly calendar, members requested including Council meetings, W.Q. Forum Workgroup meetings, CWQCC Hearings and key CWQD meetings of interest to Council members. Under Reference Materials, members requested that an indication of which CWQCC hearing be included.

Paul showed members a draft membership Certificate to be sent to all members since the Council has not previously sent Certificates to its members. Council members agreed to send a certificate to all members - one to each facility and each representative and alternate.

### V. Updates

- Nancy mentioned that many meeting agenda revisions have been made and are posted on the website, plus an email was sent to all members.
- **Mentoring** - Paul G. mentioned that he met with the AWWA Executive Committee that funds CWUC activities, including their share of the Mentoring Program. They want a formal contract, but Paul has not received it from them for their share of the Mentoring Program. CWUC is adding two of their members to the Mentoring Committee. The Division will pay one-half of the Mentoring Program for CWUC.

Sharon mentioned that several people have tried to register online to be mentors, but have had difficulty. Paul F. mentioned that Jeannie tested that function and it worked. Members recommended sending a return email to each submission as well as a call from Paul Ferraro. Paul will bring a list of mentors to the July meeting. Nancy also suggested that Paul F. contact Kathleen Reilly of the Watershed Group (303-692-3573) to meet with the Watershed Group.

- **Nutrient** - Sharon and Paul G. are going to the Nutrient Workgroup meeting on June 14, 2007. [Click here](#) to see a copy of their PowerPoint presentation.

- **Permitting Seminar Report** - Several members indicated that it went well and was well attended. The Council appreciates the State's involvement in the seminar. Paul F. mentioned that Mike Bittner helped since the seminar was held in Silverthorne.
- **RMWEA Liaison Report** - Click here for details.
- **WUC Report** - Sharon gave a review of the E Coli discussion at the recent meeting and noted that fees are increasing.

## **VI. Open Discussion**

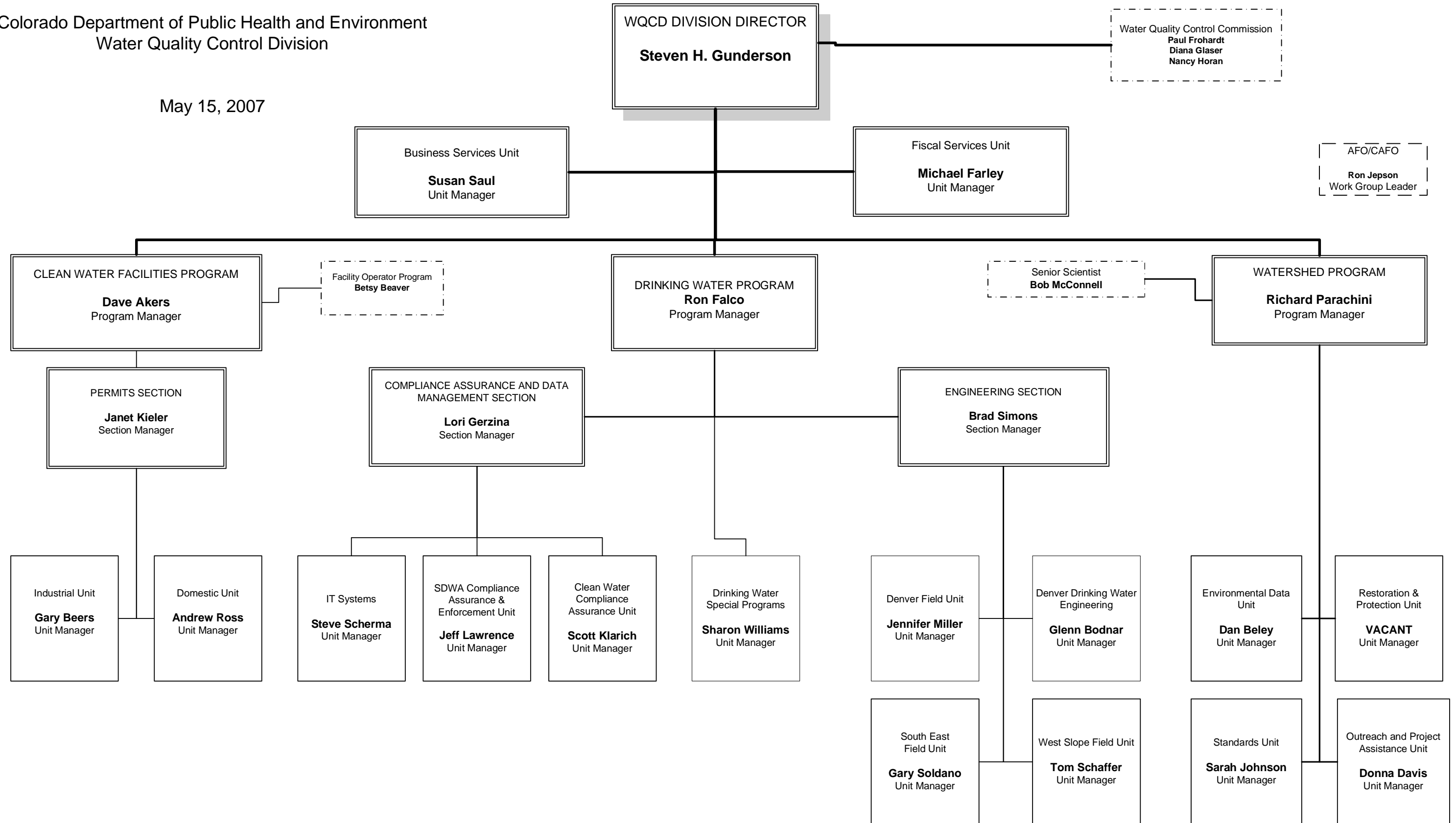
- Mary recommended that a digital camera be purchased for the Council.  
**The motion was made by Paul Grundemann and seconded by Dennis Stowe and was approved unanimously.**
- Nancy mentioned that she received a thank you card from Barb Biggs regarding her daughter's accident.
- Nancy recommended that the Council become a member of the WQ Forum.  
**Sharon Davis moved that the Council become a member of the WQ Forum by giving \$250/year and that Paul Grundemann be the Council representative. The motion was seconded by Ginny Johnson and passed unanimously.**

The meeting adjourned at 3:30 P.M.

Next Meeting: July 11, 2007 @ 1 PM at L/E WWTP

Colorado Department of Public Health and Environment  
Water Quality Control Division

May 15, 2007



# Colorado Wastewater Utility Council Nutrient Criteria Issues

Paul Grundemann, CWSD  
Sharon Davis, MWRD

June 14, 2007



# What is the CWWUC?

- The Colorado Wastewater Utility Council (CWWUC) is a nonprofit organization whose mission is to professionally and responsibly promote environmental protection by supporting legislation and regulations which achieve well-defined environmental benefits while maintaining local flexibility.
- CWWUC represents over 50 member agencies, some of which are also water providers.



# Why does the Council Care About Nutrient Criteria/Standards?

- POTWs do not generate P
- Unlike ammonia, very little total loading of P is discharged to water bodies by most POTWs
- However, regulators may look exclusively at POTWs (permitted point sources) to achieve nutrient level reductions in receiving waters
- Nutrient contributors associated with land use should be considered – Ag, urban runoff, etc.
- Nutrient removal poses extreme operational challenges and costs for biological treatment systems – limits of technology, facility size, increased CIP



# Council Letter to WQCD – Concerns & Requests

- Reservoirs with control regulations for P, receive very little relief from regulated POTWs
- 303(d) listing for water bodies if attainment is tied to nutrients standards that do not address site specific factors
- Site Specific standards for site specific uses should be considered (water supply, aquatic life, recreation)
- Request for frequent, regularly scheduled meetings in anticipation of the 2010 Rulemaking Hearing on Nutrient Criteria
- Need for additional stakeholder input: Ag, industry, stormwater, environmental groups, CAFOs, etc.
- Consideration of an alternative approach, approved by EPA, for discussion purposes:
  - Arizona narrative standard as a framework
  - Implementation using numerics



# Site Specific Standards on a Watershed Basis

## Example: Standley Lake vs. Barr Lake

- Located in same Basin/Front Range eco-region
- Both have warm water, recreation, and water supply designations
- However, differing management practices, stratification regimes, physical characteristics and watersheds make them more dissimilar than similar
- Appropriate Result – site specific standards to meet each reservoir's unique circumstances



# Other Nutrient-Related Concerns

- There still is no general agreement among current workgroup participants on the appropriate parameter(s) or translators to use (Chl-a, N, P, etc.).
- Is there really enough data from all basins, elevations, population areas, agricultural areas, and eco-regions?
- Can defensible criteria be developed by 2010 for rivers/streams, as well as, lakes/reservoirs?
- Is development of a “plan forward” a better solution for the 2010 RMH than numeric criteria based on an incomplete data set?
- EPA’s “commitment” to accelerate the pace on nutrient criteria development and implementation



# Example: Cherry Creek Reservoir, Regulation 72

- Chl-a Standard and P Goal
- TMAL for P is 14,720 lbs
- Jul-Sep mean has to be met 9 of 10 years.
- In 2006, POTWs only contributed 399 lbs P of the 2,144 lbs allocated: which is 19% of the allocation.\*
- Goal for total-P was not met in the reservoir
- Coordinated with land use agencies to implement stormwater quality requirements, reviewing 177 land use change applications.
- The traditional criteria development process may not improve water quality.

\*Data from 2006 Cherry Creek Basin Water Quality Authority Annual Report.

# EPA Guidance: Watershed Approach for Nutrients

- Per Ben Grumbles' letter dated May 25, 2007, “Incremental progress can be an effective way to accelerate progress.”
- And, “...give priority to adopting numeric standards or numeric translators for narrative standards...”
- EPA Policy: Water Body Restoration and Improvement on a Watershed Basis



# Conclusions

- The Workgroup should consider all approaches:
  - Narrative – AZ's narrative standard
  - Incremental – Iterative, Reg. 31 changes, lakes/reservoirs, address rivers/streams through controls related to lakes
  - Watershed Approach
  - Site Specific Standards
  - Numeric Translators for Narrative Standards
  - Implementation using numerics

