



**Minutes of
April 13, 2011 Meeting
at Littleton/Englewood WWTP**

In Attendance:

Dennis Stowe	L/E WWTP
Dave Meyer	Westminster
Jill Piatt-Kemper	City of Aurora
Jerry Raisch	Vranesh & Raisch
Jim Kendrick	Monument Sanitation District
Mark Donelson	Aurora Water
Mike Wicklund	Monument Sanitation District
Tim Grotheer	Centennial Water & San. Dst.
Bill Burks	Tri-Lakes WWTF
Barbara Biggs	Metro Wastewater Reclamation Dist.
Bill Brennan	Metro Wastewater Reclamation Dist.
Blair Corning	SACWSD
Stewart Fonda	L/E WWTP
Mary Gardner	L/E WWTP
Brenda Stansbury	BHCCSD
Roy Heald	Security Sanitation District - via phone
Ginny Johnson	Colorado Springs Utilities
Bruce Joslin	Northglenn - via phone
Dale Kortz	Forest Lakes Metro District - via phone
Patrick Fitzgerald	Platte Canyon - via phone
Richard Leger	City of Aurora - via phone
Paul Wolfe	
Tad Foster	Tad Foster Law Offices - via phone
Paul Ferraro	CWWUC

I. Proposed Northern Treatment Plant and Treatment Costs, Barbara Biggs and Bill Brennan (Metro Wastewater Reclamation District)

Barbara and Bill gave a presentation of metro's proposed Northern treatment Plant using GoToMeeting. To see the presentation, [click here](#).

The cost of Phase 1 is \$473 million, will be financed by revenue bonds with a start up in 2015. The State Revolving Fund cannot help.

II. WQCD Sanitary Sewer Overflow Response Plan, Dennis Stowe (L/E)

Dennis gave an overview of the State's SSO Response Program and some of the problems encountered by L/E spills. See the attached documents.

1. Sanitary sewer Overflow (SSO) Response Program
2. Attachment A - Inquiry Letter Template
3. Attachment B - Scoring Matrix
4. Attachment C - Collection System Inspection Form

L/E - 11 spills were reported to the State; several were not reported. Spills ranged from a minimum of 5 gallons to a maximum of 400,000 gallons.

Dennis said, "Cannot count on your permit; need to become familiar with the Regulations. We are getting different messages."

Need to have another discussion with Steve Gunderson, Dave Akers and other State staff regarding spills.

Policy 10 deals with spills.

III. Updates

- Colorado Water Utility Council - No report. Tim commented that CWUC and the Council need to work together on key items.
- Colorado Stormwater Council - Jill reported that cities are having problems with the State regarding development vs. maintenance.

V. Open Discussion

- Jerry stated that the Division will be seeking more funding in 2012. What does the Council need to do? Make changes to the Water Quality Act? Form a committee to track the Council's concerns, so that the issues can be discussed at the time the Division seeks the support of the Council for a fee increase in 2012.

Meeting adjourned at 3:45 pm.

***Next meeting: May 11, 2011
Location: Littleton/Englewood WWTP***

Note: Those calling in by phone need to email Jeannie that they are planning to participate by phone.

**COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
WATER QUALITY CONTROL DIVISION**

**SANITARY SEWER OVERFLOW (SSO)
RESPONSE PROGRAM**

Background

The Division's Sanitary Sewer Overflow (SSO) Response Program (Program) has been in place since federal fiscal year FFY03. It has been and continues to be a requirement of the Division's Performance Partnership Agreement (PPA) with EPA. The primary focus of the Program is upon addressing frequent or large-volume SSOs; a secondary focus of the Program is upon more broadly addressing all SSO issues in Colorado. The implementation of the Program is not intended to preclude the Division from addressing single or multiple SSO issues outside of the structure of the Program as needed to protect water quality.

A separate, but related PPA requirement that has been in place since FFY 09 is that for two (2) municipal systems (and their associated satellite systems) that the Division determines to be of concern, the Division must ensure that the systems have an appropriate operation and maintenance system and adequate capacity to handle current and projected flows (ie. Performance of the Collection System Assessments, CSAs). The PPA also specifies that the systems will be addressed in accordance with one of the criteria included in EPA's current ECEJ Guidance. EPA expects that the municipal systems selected for CSAs will have both a treatment facility and a collection system; those with just a collection system have not been accepted by EPA as appropriate to meet this requirement.

Objective

The primary objective of the Program is based upon the goal that was historically and annually included in the PPA. This goal is to "address" 20% of the SSO incidents that comprise the active inventory of SSOs. The active inventory of SSOs is defined as the inventory of all SSOs that occurred during the most recent three (3) state fiscal years (SFYs).

- Specific information on Program implementation is provided below. However, an SSO incident is generally considered to be "addressed" when any one or more of the following occur:
 - Satisfactory operations and maintenance have been documented in the response to the Inquiry (letter) from the Division and the Division determines that the problem(s) that led to the SSO have been or are being corrected;
 - A collection system inspection is done and the Division determines that the problem(s) that led to the SSO are being corrected; and/or,
 - An enforcement order listing the SSO incident(s) as a violation(s) is issued (ultimate resolution occurs at the conclusion of the enforcement process).
- Where CSAs are performed (and the Program in its entirety is not implemented), SSO incidents are generally considered to be "addressed" when one of the following occurs:
 - The findings of the CSA indicate the following:
 - Adequate collection system and receiving treatment plant capacity exist, and
 - Satisfactory operations and maintenance exist, and
 - The problem(s) that led to the SSO(s) have been or are being corrected, and
 - The facility/entity therefore has a de minimis spill rate.
 - An enforcement order listing the SSO incident(s) as a violation(s) is issued (ultimate resolution occurs at the conclusion of the enforcement process).

Program Specifics

- Information for all SSOs that are reported to the Division is maintained in the Division's Spill Database. The Spill Database includes records dating back to 1997.

Information in the Spill Database is revised as updated/more accurate information becomes available through the Division's spill follow-up work. This follow-up work happens through the normal course of spill response as well as the SSO Program Implementation discussed in this document. Finalization of a spill report and associated documentation requires a staff investigation and management-level review.

SSOs are removed from the active inventory only after having been "addressed". Lower priority incidents may be removed from the active inventory after three years.

- For the past several years, the PPA has required and continues to require that the Division implement its Program and that a report on the implementation be submitted to EPA by October 15 of every calendar year.

Each year, the Program implementation includes the following steps:

- The Spill Database is queried to compile the active SSO inventory for the current FFY's October 15 report. For example, regarding the active inventory for the October 15, 2008 report, this would include SSOs that had not been previously addressed (as defined below) and that occurred during SFYs 05, 06 and 07 (July 1, 2004-June 30, 2007).
- Identification of facilities/entities in the active inventory that have high-priority SSOs per the following criteria:
 - Have had multiple SSOs with at least one of the SSOs exceeding 5,000 gallons **AND/OR**
 - Have had a single SSO with a volume of 50,000 gallons or greater.
- The "20%" Implementation List that will be "addressed" through the Program for the current FFY is developed in accordance with the following:
 - If the high-priority SSO list comprises 20% of the required number to be addressed, these facilities/entities will comprise the majority of the list for that year's implementation. In light of additional information that may be obtained during Program information and to ensure that the 20% is met, additional facilities/entities that have had SSOs, but may not fall into the high-priority listing may be added to the current implementation list as needed.
 - If the high-priority SSO list does not comprise 20% of the required number to be addressed, additional facilities/entities will be added to meet and slightly exceed the 20% number.
- The Division must identify two (2) facilities at which CSAs will be performed. Wherever possible, the Division will select the two facilities from the high-priority SSO list or the overall 20% Implementation List (if an appropriate entity/facility is not available on the high-priority list, ie. An entity/facility that does not have an associated treatment facility would not be appropriate to meet EPA expectations.)
- Except for those facilities/entities identified for CSAs, every facility/entity on the Implementation List receives an SSO Inquiry Letter from the Division. The Inquiry Letter specifies a 30-day response deadline by default. The Inquiry Letter

template is updated as needed to ensure that the information requested is as comprehensive and appropriate as possible. The current Inquiry Letter template is found as Attachment A.

The Inquiry Letter responses are reviewed and evaluated by the Division in accordance with the Scoring Matrix. The Scoring Matrix is updated as needed to ensure that the response evaluations are as comprehensive and appropriate as possible. The current Scoring Matrix is found as Attachment B. The score assigned to each response dictates subsequent steps in the Program Implementation.

Scoring Action Summary:

- 85 to 100: no further follow-up. SSOs considered to be addressed.
 - 70 to 85: SSOs considered to be addressed, but reference (assistance) materials to be provided as appropriate for specific topics.
 - 69 or below: Undertake additional compliance assistance and compliance assurance activities as needed to address the SSOs. Activities include some or all of the following: (1) collection system inspections, (2) technical and financial assistance if available for collection system evaluation and (3) possible formal enforcement.
6. For those facilities/entities with response scores 69 or below, unless other extenuating circumstances exist (facility/entity currently being addressed via Collection System Assessment (CSA), ongoing/other enforcement, recent collection system inspection, etc.), the following activities will be performed:
- a. A collection system inspection will be performed to help the Division gain an understanding of site conditions and to clarify or obtain more information regarding the Inquiry Letter response submittal. The collection system inspection form is found as Attachment C. The collection system inspection form is updated as needed to ensure that the information gathered during the inspections is as comprehensive and appropriate as possible.
 - b. Based upon the inspection findings, the Division will determine if the problem(s) that led to the SSO issues have been or are being appropriately corrected. Because violations of State statute and/or a CDPS permit have occurred at this point, a Compliance Advisory will be issued that documents the inspection findings and formally notifies the facility/entity of non-compliance. The expectations that will be included in the Compliance Advisory will vary with the specific situation.
 - Generally, if the findings of the collection system inspection indicate that the SSO issues have been or are being appropriately corrected (although enforcement is never precluded by an Advisory), the Program Implementation for those included SSOs (in the active inventory) would end once the Advisory's response expectations, if any, are met.
 - Generally, if the findings of the collection system inspection indicate that the SSO issues have not been and/or are not in the process of being appropriately corrected, formal enforcement action may be taken by the Division.

Enforcement Actions

Enforcement actions may consist of compliance schedules, consent agreements, or enforcement orders. They are formal mechanisms for compliance assurance, and include specific penalties for violations. The Division has used these tools for a number of systems with SSOs. Because an SSO regulation has not been issued by the EPA, the Division relies upon elements of the Colorado Water Quality Control Act and specific permit conditions as the bases for enforcement. Enforcement determinations are based upon the Division's Enforcement Response Guide (ERG).

Collection system problems may require long-term infrastructure improvements and enforcement actions are useful in defining the pathway to resolution. The information gathered from the CSAs and the SSO Response Program is helpful in the development of an effective enforcement action.

Attachment A
Inquiry Letter Template

STATE OF COLORADO

Bill Ritter, Jr., Governor
Martha E. Rudolph, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

January XX, 2011

Certified Mail #: 7010 2780 0002 8752 XXXX

Name, Title

[Entity Name]

Address

City, Colorado 8_____

Subject: Sanitary Sewer Overflows from the [Entity Name] Wastewater Collection Facilities, XXXXX County, CDPS Permit Number: CO-XXXXXXX

Dear **Mr. Name:**

On the national level and in Colorado, regulatory attention to sanitary sewer overflows has increased. Sanitary sewer overflows are violations under the Colorado Water Quality Control Act, §25-8-501(1) of the Colorado Revised Statutes. Historically, the Water Quality Control Division (the "Division") has responded only to significant or repeated sanitary sewer overflows with formal enforcement; however any sanitary sewer overflow may merit an enforcement response depending upon the circumstances of the overflow.

Division records establish that **the Town of ENTITY NAME** has experienced one or more sanitary sewer overflows during the past several years (*see attached table*). Therefore, the Division has initiated a process to evaluate sanitary sewer overflows from the operations and the management processes that **the ENTITY NAME** implements, including operation and maintenance programs, to prevent sanitary sewer overflows.

In support of this effort, the Division is requesting the following information regarding sanitary sewer overflow events, their causes, and the response and follow-up work conducted by **the ENTITY NAME**:

1. An up-to-date list, including date, time, duration and volume, of all sanitary sewer overflows that occurred within your collection system within the period from July 1, 2007 to June 30, 2010. Where a sanitary sewer overflow was previously included in the Division's 2009 or 2010 inquiry and inspection process, the event is noted in the attached table.
2. A description of the determined cause for each sanitary sewer overflow event identified in paragraph 1 above, and the actions taken to respond to each event. This description should include, at a minimum, the following information:
 - a. A detailed narrative of the determined cause and/or contributing factors that led to each sanitary sewer overflow event.
 - b. A determination if the sanitary sewer overflow event resulted in a release to "State Waters" and, if applicable, the name of the receiving water.

- c. A description of any environmental or public health impact from each sanitary sewer overflow event.
 - d. A specific description of response and remediation efforts undertaken to mitigate or minimize the impact from each sanitary sewer overflow event, including equipment or sewer line repairs.
 - e. A specific description of the previous and future planned or scheduled maintenance activities for each sewer line segment or piece of equipment associated with each sanitary sewer overflow event.
3. An assessment of the utility's collection system capacity to convey current and future projected average and peak flows.
 4. A summary of the utility's operations and maintenance programs, including any policy or procedural changes in management, operations, and maintenance that have been implemented or are planned to be implemented in response to sanitary sewer overflows.

(The Division recognizes that you may have previously provided some or all of the above requested information to the Division. However, in order to ensure that our information is correct and most importantly up-to-date, the Division is requesting that you review your records, consolidate your information and resubmit/submit it to the Division in response to this request.)

Please send your response to this information request to my attention, within thirty (30) calendar days of receiving this letter. The information you provide will be considered by the Division in determining if a formal enforcement response is warranted, and you will be advised of the Division's evaluation of your operations and maintenance programs. Please be advised that this collection and evaluation of information related to your facility's sanitary sewer overflows does not limit or preclude the Division from pursuing its enforcement options for violations of the Colorado Water Quality Control Act.

If you have any questions regarding this matter, please don't hesitate to contact Joe Campbell at (303) 692-2356 or by electronic mail at joseph.compbell@state.co.us or myself at (303) 692-3564 or by electronic mail at scott.klarich@state.co.us.

Sincerely,

Scott Klarich, Unit Manager
Enforcement Unit
Compliance Assurance Section
WATER QUALITY CONTROL DIVISION

Enclosure: Summary of CDPHE Sanitary Sewer Overflow Data for **the ENTITY NAME**

ec: Jennifer Miller, WQCD Engineering Section
David Kurz, WQCD Engineering Section
Add in applicable ES UMs/DEs
Aaron Urdiales, EPA/Region VIII (w/enclosure)

Attachment B
Scoring Matrix

SSO Scoring Matrix. Based on Capacity, Management, Operations, and Maintenance

System:

Submittals:

Reviewer:

Comments:

Review Date:

Evaluation Element	<ul style="list-style-type: none"> • Response Evaluation Summary: 	Summary Point Score /100
<p>Capacity (10%): The ability to move wastewater and I&I. Elements:</p> <ul style="list-style-type: none"> • Wet weather inflows? • I&I issues? • Age and condition of collection system? • Future growth impacts? 		/10
<p>Management (20%): Providing resources for the collection system program. Elements:</p> <ul style="list-style-type: none"> • Infrastructure master plan? • Capital improvements prioritized? • Collection system operations budget? • Operations staff supported? 		/20
<p>Operations (40%): Keeping the collection system working. Elements:</p> <ul style="list-style-type: none"> • Are there drawings of the collection system? • Trouble spots identified? • Regular, effective cleaning program? • How is effectiveness evaluated? 		/40
<p>Maintenance (30%): Fix the collection system when it breaks, evaluate its condition. Elements:</p> <ul style="list-style-type: none"> • Is maintenance 		/30

preventative or reactive? • How is trouble identified? • Are alarms checked? • How are lift stations and manholes handled?		
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Rating Summary:

- Systems scoring 85 to 100: no further follow-up. SSOs considered to be addressed.
- Systems scoring 70 to 85: provide reference materials. SSOs considered to be addressed.
- Systems scoring 69 or below: undertake additional compliance assistance and compliance assurance activities as needed to address the SSOs. Activities could include collection system inspections, technical and financial assistance, if available, for collection system evaluation, and potentially formal enforcement activity.

Attachment C
Collection System Inspection Form

COLLECTION SYSTEM ASSESSMENT QUESTIONNAIRE

Collection System Name:	Inspection Date:
Individual Interviewed:	Inspector:
GENERAL INFORMATION	COMMENTS
Population of service area	
Industrial or pretreatment discharges	
Infrastructure master plan and capital improvements coordinated?	
System capacity evaluation for current and projected flows (growth)	
Budget for collection system O&M (amount)	
Budget for collection system Capital (amount)	
Certified operator (Collection system - name)	
Maintenance program (e.g., preventative, reactive) - describe for both lift stations and collection system	
Restaurant /grease trap ordinance, active inspection program (# inspectors, frequency)	
Proximity of failure points to sensitive area (i.e. surface waters, swim beaches)	
Emergency Response Program (<i>operator avail. 24/7</i>)	
Spill response – established written protocol for overflow containment, mitigation, cleanup	
Spill prevention – established written protocol for problem diagnosis leading to preventative measures being initiated	
Equipment available for emergency response (describe or attach)	
Spill reporting – established written protocol for notifications internal / State / Public	
Materials containment protocol – describe	
SYSTEM FEATURES	
<i>Gravity Sewer:</i>	
Collection system knowledge (e.g., as-built, maps, drawings)	
Age and materials of collection lines	
Condition of collection lines	
Miles of gravity sewer	
Number of manholes and condition (brick, replaced, lined)	
Collection system generally meets design criteria for grade, capacity, and materials	
Infiltration and wet weather inflows (i.e., known infiltration, wet weather flow increase)	
Testing for inflow/infiltration (e.g., flow meters, video)	
Trouble spots identified	

Regular cleaning program (miles or % per year, regular and trouble areas)	
Periodic collection sewer inspection program (e.g., CCTV) (miles or % per year)	
Periodic manhole inspection program (number or % per year)	
Sewer and manhole rehabilitation / replacement plan	
New construction acceptance program, construction QA program (i.e. pressure test, lamp test)	
Lift Station:	
Number of lift stations (list details in separate table)	
Miles of force main	
Force main inspection annually (miles or feet)	
Written procedures for force main inspection and maintenance	
Air relief / vacuum valves inspected annually	
Written procedures for air relief / vacuum valves routine inspection and maintenance	
As-Built drawings of the system	
Flowmeter / hourly use meter functional	
Alternate power source / Emergency storage	
Lift stations generally meet design criteria for alarms, emergency storage volume, capacity	
Lift station O&M records available	
Lift stations have site/design approval	
Lift station flows match site/design approval	
Lift station level control system functional (type)	
Lift station warning system functional (type)	
Regular periodic testing of level control & warning systems	
Pump clogging vulnerability (i.e., barscreen, comminutor)	
Security / sign postings adequate	
SSOs:	
Number of SSO's (list details on separate table, dates, volumes, cause, etc.)	
SYSTEM EVALUATION SUMMARY	COMMENTS
Are the causes of the SSOs being adequately addressed? Is there a credible program to prevent future incidents from the same root causes?	

Lift Station Summary

Lift Station ID	Site Location Approval (Number, Date)*	Approved Hydraulic Design Capacity (MGD) Max Month Average Day	Approved Hydraulic Design Capacity (MGD) Peak Hourly Flow	Firm Fixed Pumping Capacity (MGD)	Most Recent Max Month Average Day Flow (MGD)

*If no Site Location approval, please indicate date of Lift Station construction.

