



CONFLUENCE

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1st Quarter - 2008

CAN WE AFFORD IT? Project Costs and Local Burden

PART II IN A SERIES

There are many kinds of projects that can be funded by State Revolving Fund (SRF) loans, or in a few cases, grants. These can include capacity additions, treatment improvements, additional treatment requirements, infrastructure repair/replacement and storm water projects. The Intended Use Plan for the SRF is structured to include priority points for the cost of projects (called the Local Burden) as well as priority points for sewage treatment rates (called the Ability to Pay), as described in the 4th quarter 2007 newsletter article. The criterion for points given for project cost provides a glimpse at what the EPA and the State may consider to be *affordable* on a project basis.

Local Burden

The criterion for project cost affordability is based on the cost of the project per equivalent residential tap. Ratings are as follows: no priority points awarded for a project cost of less than \$2,000 per tap, 10 points awarded for projects over \$3,500 and the cap on priority points is 20 for projects costing over \$5,000 per tap. Local Burden is likely higher than most people realize, as shown below.

To cite an example, the ongoing project at the Littleton/Englewood WWTP (L/E) has a total price tag of \$115,000,000. This is the largest project these cities have undertaken in their history and was viewed by the “decision makers” as a large project. With a service population of approximately 300,000 and about 90,000 taps, the project is costing customers around \$1,300 per tap. Therefore, no priority points were given for this SRF loan. When L/E applied for this loan, no other “large” project was competing for funds. So the cities were able to receive a loan. However, if another facility with a higher point rating was competing L/E would not have been given consideration as being “in need”.

The SRF project eligibility list includes information on population, not taps. So, the following discussion is based on a per capita project cost; however, you can convert to an approximate per tap cost by using a population equivalent. The L/E project is about \$400 per person for comparison. A review of the 2007 project eligibility list for wastewater projects, shows there are several planned projects in this same cost range per capita-less than \$1,000 per person. However, **many** of the projects listed are more than \$1,000 per person. Some examples are: the City of Pueblo with a \$112,000,000 project at about \$1,100 per person; Glenwood Springs with a \$28,000,000 project at \$2,800 per person; Redcliff has a \$2,300,000 project at \$6,500 per person and so on. These projects still do not impose the highest Local Burden. Idaho Springs has an eligible project at \$11,000 per person. Possibly the leading eligible project is the Town of Rico with a \$4,400,000 project and a listed population of 250 people; \$17,000 each. Your challenge - find a project on the list with a higher per capita local burden! No fair using the new 2008 list.

These figures are derived from the eligibility list; actual costs for the projects may vary based on final project design/bid, actual population if the plant is a regional plant and other variability. What becomes clear from this evaluation of the project list is that wastewater projects are becoming more expensive as water quality standards become more restrictive, the cost of construction materials escalates and energy becomes more expensive, and the SRF program may not help you.

See the recently approved IUP at <http://www.cdphe.state.co.us/op/wqcc/IntendedUsePlans/08IUP/08IUP.html>



CWWUC Calendar

Stay Tuned In - Stay Informed

The CWWUC meets the second Wednesday of every month at the Littleton/Englewood WWTP, located at 2900 S. Platte River Drive, Englewood, CO. Please visit our website for a map and driving directions.

Looking Forward to 2008

As 2008 quickly approaches, the Council is preparing its list of speakers and topics for training, tours and general meetings. The lineup is looking exciting. We're hoping it will be useful and productive for you.

Here is a list of the tentative topics and speakers:

■ January

Colorado Water Quality Control Commission 2008 Activities and Water Quality Forum updates; Paul Frohardt

Revolving Fund—Funding Alternatives; Keith McLaughlin, Donna Davis and Barry Cress

■ February

Use Attainability Analysis from both EPA and Water Quality Control Division Perspectives

EPA Activities; TBD

■ March

State Environmental Program, Legislative Overview; Martha Rudolph, WQCC

Colorado Water Congress Activities and Issues; Doug Kemper

■ April

Contaminants of Emerging Concerns; CREEC, USGS, Boulder

■ May

Nutrients and Selenium Update; GEI Consultants

■ June

Water Quality Control Activities/Legislative Update; Steve Gunderson

Water Quality Control Division Policies Update

■ July

Stormwater Update; Jill Piatt Kemper

■ August

Nomination of Officers/Slate of Nominees

■ September

Annual Meeting at RMWEA Conference location

■ October

Boulder WWTP Modifications; Bret Linenfelser

■ November

Water Quality Control Division Activities and Policies; Steve Gunderson

■ December

Nutrients—GEI and WQCD Representative

Keep an eye on our website for updates and agendas. We will be confirming speakers and adding training throughout the year.

Speakers: <http://cwwuc.org/speakers.html>

Agendas: <http://cwwuc.org/agenda.html>



Set against the Rocky Mountains as a back drop the new Colorado Springs J.D. Phillips Water Reclamation Facility is a fully covered second plant for Colorado Springs. The CWWUC toured the facility during the October meeting.

Forum Corner

The Colorado Water Quality Forum Workgroups provide an opportunity for an ongoing informal dialogue among diverse parties of stakeholders' interests in water quality management.

Participants include water suppliers, industrial and municipal dischargers, environmental groups and federal, state and local agencies.

Each quarter *Forum Corner* provides a brief status of some of the active workgroups. It is not meant to be a detailed update. For more information go to the Forum Website at <http://www.cwqf.org> and click on Workgroup Links.

Agricultural Diversions – This workgroup began by exploring issues related to oil and gas exploration water that impacted agriculture. It now has a larger scope and may impact your POTW! Take a look at the 2nd draft guidance document and make comments to Gary Beers, Facilitator CDPH&E, 303.692.3524, gary.beers@state.co.us or the coordinator Landon Gates, Colorado Farm Bureau, 303.749.7516, lgates@colofb.com.

Spill Reporting – Read the latest update from Dave Akers, dated 11-08-07. If you have questions on this important issue contact Dave Akers, Facilitator, 303.692.3591 Dave.Akers@state.co.us or the Coordinator Dave Meyers, City of Westminster, 303.430.2400 x2376 dmeyer@ci.westminster.co.us.

Aquatic Life – Contact the Facilitator, Christopher Theel CDPH&E, for the latest information on the progress of *Expected Condition*. Call Chris at 303.692.3558 or email him at Christopher.Theel@state.co.us for updates.

Nutrient Criteria – The next two meetings are scheduled for January 23 and April 15. Read the latest meeting summary dated October 23. It can be found on the forum website. This will impact you. Make your voice heard! **Co-Chairs are: Rivers and Streams** Blake Beyea, Water Quality

Control Division 303.692.3656
Blake.Beyea@state.co.us, Lakes and Reservoirs

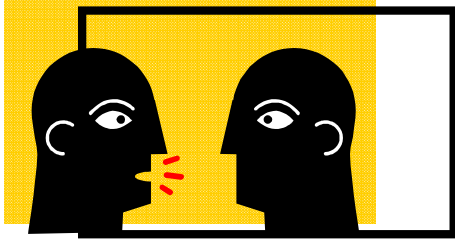
Lakes and Reservoirs Jim Saunders, Water Quality Control Division, Jim.Saunders@state.co.us
Coordinator, Mary Fabisiak, City of Westminster, mfabisiak@ci.westminster.co.us
303.430.2400 ext. 2187

Regulation 61 –The Rulemaking hearing for this regulation is scheduled for March 11, 2008. If interested in knowing more about the changes which may affect you and your permit contact Janet Keiler, the facilitator, CDPH&E 303.692.3599 Janet.kieler@state.co.us or Carol Webb the Coordinator, City of Fort Collins 970.221.6231 cwebb@fcgov.com.

Membrane Treatment– For updates contact either Dave Akers CDPH&E 303.692.3591 dave.akers@state.co.us or Laurie Rink, FRICO, 303.777.0188 lrink@uos.net to find out more about this group and how to join in the discussions.

Standards Framework–This new workgroup is identifying and discussing possible issues for the 2010 Basic Standards hearing. Paul Frohardt of the Water Quality Control Commission is the Chair; 303.692.3468 paul.frohardt@state.co.us and Amy Woodis of the Metro Wastewater Reclamation District is the Coordinator; 303.286.3240 awoodis@mwrddst.co.us. Contact either of them with questions or possible issues for discussion.

E. Coli–The E. Coli Workgroup has been discussing Bacteria Pellston Workshop, Impact Beach Project, EPA Decision chart, EPA Microbial Source Tracking Document and Research subgroup TMDL Components—to name a few. Contact Becky Anthony, Chair at 303.692.3339 rebecca.anthony@state.co.us or Coordinator James McCarthy at jim-m@arvada.org



Use Attainability Analysis What's it all About?

I'm sure you have all heard references to conducting, developing or gathering data for a Use Attainability Analysis (UAA). But, do you know what a UAA is all about? Two years ago the EPA held several detailed workshops to address this very issue. Since then, there has been more reference to the UAA but with much hesitancy and trepidation.

Let's take a closer look at this issue. March 13, 2006 Mr. Ephraim King, EPA Director of the Office of Science and Technology signed a memo which had this to say about UAAs. *"I am writing you to reinforce the importance of working together with our state and tribal partners to make the UAA process operate more effectively. As you know, appropriate and defensible water quality standards (WQS) are essential for achieving the Clean Water Act (CWA) goals of maintaining and restoring water quality—and getting WQS right starts with getting designated uses right.*

With this memo, I am attaching a set of case studies which demonstrate a number of UAAs that are associated with a designated use change. These case studies illustrate the breadth and variety of successful UAAs in terms of the types of waterbodies and uses addressed, the factors involved (i.e., natural, human-caused, or economic conditions), and the complexity and depth of analysis.

Our goal is to make the WQS program work better. Our priority is to improve clarity in the WQS process including better communication, understanding, efficiency, and increased public awareness. Making the UAA process operate effectively is an important step towards achieving these priorities. Once states and tribes designate the appropriate uses, the right water quality

criteria, permits and targets for Total Maximum Daily Loads (TMDLs) will follow to move us towards improving water quality".

Mr. King says in his memorandum the UAA is used to address a variety of conditions where a Designated Use may be assigned incorrectly or cannot be obtained for a variety of reasons.

What is a Designated Use? *"Designated uses are the uses specifically assigned (designated) to a water body for protection under the water quality standards. Designated Uses are sometimes referred to as "beneficial uses" and were referred to as "characteristic uses" in the previous state water quality standards. A Designated Use might or might not be an existing use. When conducting a UAA study, the focus should be on determining the attainable uses and attainable water quality rather than removing designated uses".*

Of course this is all very complex and cannot be covered in one short article. If your agency is struggling with current regulatory issues that may best be served by preparing a UAA there are very helpful resources available. The first and *most important* step is to work directly with the proper representatives at the Colorado Water Quality Control Division to determine a strategy. It can be costly and time consuming to move forward without proper guidance and direction.

Colorado has a twenty five page document titled **The Nature of the Current Use Attainability Analysis Process**. A copy can be received by contacting Sarah Johnson at the Division at either 303/692-3609 or sejohnso@smtpgate.dphe.state.co.us

Other informative documents are EPA's **Frequently Asked Questions about Use Attainability Analysis**, the entire memorandum from Ephraim King, **Improving the Effectiveness of the Use Attainability Analysis (UAA) Process**, the WERF guidance document titled **Collaborative Water Quality Solutions: Exploring Use Attainability Analysis**.

Be sure to attend our February meeting to hear more on UAAs.



Did you Say Nutrients?

In 2010, the Colorado Water Quality Control Commission is expected to adopt statewide nutrient criteria for lakes/reservoirs and rivers/streams. The U.S. Environmental Protection Agency (EPA) has set Clean Water Act Section 304(a) criteria for nutrients and has been pressing Colorado to set enforceable standards for the last several years.

Excessive levels of nutrients can promote growth of algae, affect recreation (e.g., “slime factor” in lakes/reservoirs), and can interfere with drinking water treatment from terminal water supply reservoirs. Nutrients include both causal variables (nitrogen and phosphorus) and response variables (chlorophyll a and clarity). Setting appropriate levels of nitrogen and phosphorus is complicated further by numerous environmental sources, including storm water runoff and agricultural inputs. Controlling nutrients through publicly owned treatment works (POTWs) alone will not solve nutrient impairments throughout the State.

From a wastewater utility perspective, nutrient removal at POTWs will not solve overall nutrient impairment in any particular segment due to these other, uncontrollable sources of excess nitrogen and phosphorus. Moreover, nutrient removal at wastewater treatment facilities can be expensive, since advanced treatment techniques are required. However, according to the EPA, tertiary treatment for nutrient removal is “affordable,” meaning \$18 to \$46 added monthly cost for consumer sewer rates.

Because of the potential costs to comply with the Commission’s adoption of nutrient criteria, the

Council is looking to its members to support a proposal from GEI/Chadwick to provide technical support in the Nutrient Criteria Workgroup process leading up to the 2010 Basic Standards hearing. This support will ensure that the Council has an independent review of the Water Quality Control Division’s nutrient criteria proposal. The GEI/Chadwick scope of work is estimated to cost approximately \$52,000. We are actively soliciting support from Council members to fully fund this important effort. To contribute, please contact Paul Grundemann at 303-791-7181 (pgrundemann@cwsdhrmd.org) or Paul Ferraro at pferraro@ix.netcom.co



Update from the Colorado Water and Wastewater Mentoring Program

The Colorado Water Quality Control Division, Drinking Program is financially supporting the implementation of the water portion of the Colorado Water and Wastewater Mentoring Program.

The Mentoring Program submitted a Proposal to the Operators Certification Committee requesting that training units be given to mentors and mentees who participate in the Colorado Water and Wastewater Mentoring Program - Peer-to-Peer Mentoring. The Proposal was rejected by the Committee. The Program will submit one on one mentoring arrangements for approval. Stay tuned for the results.

Miss a Recent CWWUC Meeting?

You can access the minutes of our current meetings via our website. www.cwwuc.org

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The newsletter of Colorado Wastewater Utility Council is published four times a year in January, April, July, & October.

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