



# CONFLUENCE

2nd Quarter - 2007

## Ammonia Rulemaking Hearing Update

On March 13, 2007 the Council provided testimony before the Water Quality Control Commission pertaining to revisions to the ammonia standards throughout the state. Generally, the revised ammonia standards are more stringent for wastewater treatment plants that discharge to warm water segments and less stringent for plants that discharge to cold water segments.

The Council made comments regarding several issues associated with the revised ammonia standards, including:

### Temporary Modifications

Despite EPA's concerns over timely implementation of the revised ammonia standards, the Council supported the use of temporary modifications to provide adequate time for communities to fully and carefully plan for and finance any needed upgrades to existing WWTPs. Individual entities, including Council members, provided the Commission with specific information on the lengthy processes needed to prepare, acquire funds, design, receive approval and construct capital improvements to address ammonia removal.

The Council does not support 18 months as adequate time for facilities to fully develop plans and make progress toward attainment with the revised ammonia standards. This is especially important for dischargers to warm water segments, who are facing more stringent future effluent limits. As such, the Council asked that the Commission approve site-specific requests for longer duration temporary modifications when an adequate plan is provided.

### Compliance Schedules

The Council supported the use of compliance schedules that may extend past a permit term, as proposed by EPA. This is a change from long-standing practice, and it indicates that the regulatory agencies understand that time will be needed to achieve compliance.

### Funding

Successful implementation of the ammonia standards will happen only so long as communities have adequate funding to plan for and build needed upgrades.

At the federal level, the administration's FY 2008 budget request recommends approximately \$688 million for the Colorado Water Pollution Control Revolving Fund program, which is half the funding level of \$1.35 billion seen in FY 2004. EPA's position is that localities should utilize private investment and not rely on federal funds to address infrastructure issues.

At the state level, \$3 million in grant assistance to municipalities with less than 5,000 populations was recently cut by the Capital Development Committee. This will disproportionately affect small communities – especially if existing infrastructure such as lagoon systems need to be replaced – that may have less ability to acquire private funding.

The Council recommended the Commission take all considerations into account to develop a workable implementation policy for the revised ammonia standards. The Council is especially concerned that insistence on rapid implementation of the more stringent requirements for warm water streams on the eastern plains may negatively affect more traditional rural communities that cannot afford needed facility upgrades.

The Council will update the membership on the outcome of the hearing in the next newsletter.



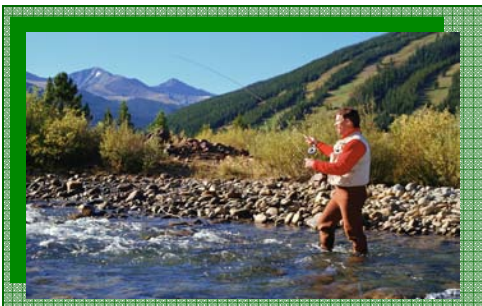
## Inside the Water Quality Forum Workgroups

What is it like to be a Water Quality Forum workgroup attendee? Better yet, have you ever seen a Whirling Dervish? Sometimes it almost looks the same. Currently, 11 workgroups are listed on the web site

([www.cwqf.org/Workgroups/Workgroup.htm](http://www.cwqf.org/Workgroups/Workgroup.htm)). Also, 12 groups are listed in the "Prior Workgroup" section. Interested parties represent a variety of agencies and businesses and may come from all over the state. Depending on your area of interest, you may see folks attending all, or just one or two, workgroups. These groups offer an opportunity to be part of regulatory, policy and guidance development.

Some workgroups have a much focused purpose. The work may be completed within 6 to 10 meetings. Others take on a life of their own, spreading like tentacles on an octopus. These may take years to conclude. (Temperature comes to mind). The Ammonia group organized, focused on a specific purpose, generated a large volume of information, concluded the work and was finished in less than one year. However, since this group focused on "education and outreach to stakeholders", the Commission has periodically checked in to ask if the group needs to reconvene for any additional work. A Nutrients workgroup began years ago, stopped meeting and is back in action; promising to become a very hot topic.

Workgroups can be a viable resource for your organization. It does take time and energy but the commitment is an investment into the future for your organization. All in all, whether you attend one workgroup or a dozen, it's another way to stay informed in this ever changing regulatory arena.



## Colorado Proposed Self-Certification Program

Are you interested in your wastewater facility becoming part of a Self-Certification Program? Do you know what a Self-Certification Program is? The State of Colorado is considering supporting a program whereby the WWTP facility representative will submit requested information to the state which would be equivalent to an inspection.

Why is Colorado making this proposal? Several Reasons! Many of the major WWTPs have exemplary compliance records. They do not need as much on-site assistance. Many minor plants are in need of greater compliance assurance efforts.

How many you ask? Of the 110 major WWTPs, 10% of the inspections detected violations which were resolved fairly quickly. However, of the 450 minor plants, 33% had violations of some sort with 50% unresolved. As the state inspectors view this, they would be able to make more resources available to the minor plants to help assist in correcting the problems; thus helping to improve the compliance rates at minor plants while maintaining the compliance rates at major plants.

This program offers some positive options and begs some questions to be answered. For instance:

1. How much paperwork is involved in the submittals?
2. What are the implications of more reporting from the facility?
3. Is it more or less time consuming for the facility?
4. Will it be beneficial to everyone or just shifting the burdens?
5. Will minor facilities receive the help they need or not?

If you are interested in learning more about this program, contact Brad Simons, WQCD-ES, 303.692.3650 or [bradley.simons@state.co.us](mailto:bradley.simons@state.co.us)

# 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 <http://www.cwqf.org> and click on Workgroup Links.

**Spill Control** — is developing guidance and regulations regarding spills and spill reporting. Recent work has been on defining spills that impact state waters, therefore become reportable. Spills which do not impact state waters would require *tracking* but not reporting. Dave Akers, Chair, 303.692.3591 [Dave.Akers@state.co.us](mailto:Dave.Akers@state.co.us) and Coordinator Dave Meyers, City of Westminster, 303.430.2400 x2376 [dmeyer@ci.westminster.co.us](mailto:dmeyer@ci.westminster.co.us).

**Aquatic Life** — Facilitator Chris Theel, CDPH&E, is your contact for more information or to get involved in the group. 303.692.3558 [Christopher.Theel@state.co.us](mailto:Christopher.Theel@state.co.us). Go to the workgroup web site to view the Colorado Bioassessment tool.

**Nutrient Criteria** — Watch the web site for times and dates. From the web site you can download a variety of studies including: [Colorado Lake Nutrient, CU Nutrient Thresholds Study](#), [Lake Nutrient Criteria Colorado](#), [Lewis EPA 227 Presentation](#), [NC Milestones](#), [NC Plan EPA](#), [Nutrit Schematic](#), [Nutrient Criteria Plan](#). **The Division has announced they will be developing river nutrient standards for the 2010 Basic Standards!**

The co-facilitators are Joni Nuttle 303.692.3533 [Joni.Nuttle@state.co.us](mailto:Joni.Nuttle@state.co.us) and Lucia Machado [MLMachad@cdphe.state.co.us](mailto:MLMachad@cdphe.state.co.us) 303.692.3585. Coordinator Mary Fabisiak 303.430.2400 x2187 [mfabisiak@ci.westminster.co.us](mailto:mfabisiak@ci.westminster.co.us).

**Regulation 61** — This workgroup has been discussing issues and concerns regarding NPDES permits. Janet Keiler, CDPH&E 303.692.3599 [Janet.kieler@state.co.us](mailto:Janet.kieler@state.co.us) or Carol Webb, City of Fort Collins 970.221.6231 [cwebb@fcgov.com](mailto:cwebb@fcgov.com). To view a list of issues go to the Water Quality Forum web site and click on the link.

**Membrane Treatment (formerly Colorado RO Roundtable)** — As more utilities look toward advanced treatment to ensure safe drinking water, the need for exploring the issues associated with disposal of waste streams from these systems has become critical. Contact Laurie Rink, FRICO, 303.777.0188 [lrink@uos.net](mailto:lrink@uos.net) to find out more about this group and how to join in the discussions.

**Temperature** — The Temperature regulation was finalized before the Colorado Water Quality Control Commission, January 8 of this year. A copy of the new regulation is available at <http://www.cdphe.state.co.us/op/wqcc/WQClassandStandards/Temperature/Temperature.html>. The workgroup has completed its work.

**303D Listing Methodology** — This group has completed the agenda items which were scheduled for discussion. A copy of the draft document is located at <http://www.cdphe.state.co.us/op/wqcc/AAH/08ListingMethodology.pdf>. Phil Hegeman, CDPH&E, Facilitator, 303.692.3518 [philip.hegeman@state.co.us](mailto:philip.hegeman@state.co.us). The hearing for this regulation is scheduled before the Water Quality Control Commission on May 15, 9:00am.

**Agricultural Diversions** — A new workgroup exploring issues related to oil and gas exploration water impacting agriculture. Chaired by Gary Beers CDPH&E, 303.692.3524, [gary.beers@state.co.us](mailto:gary.beers@state.co.us) and coordinated by Landon Gates, Colorado Farm Bureau, 303.749.7516, [lgates@colofb.com](mailto:lgates@colofb.com). For more information please contact one of the above.



# 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 web site for a map and driving directions.

### April 11



Jacob Bornstein, Executive Director for the Colorado Watershed Network (CWN) will present an update on the Colorado Data Sharing Network (DSN) which is associated with the Colorado Water Quality Monitoring Council. This organization works to serve as a statewide collaborative body, open to all, to help achieve effective collection, analysis and dissemination of water quality data and monitoring information. Come hear more about this valuable tool. (DSN trainings are being held in April in Longmont, Golden and Fort Morgan.) Click on this link for more information:

<http://www.coloradowatershed.org/cwqmc> or contact Vic Lucero, City of Thornton, [Vic.Lucero@cityofthornton.net](mailto:Vic.Lucero@cityofthornton.net).

Phil Hegeman, Colorado Department of Public Health and Environment, Water Quality Control Division will provide an overview of the 2008, 303(d) Listing Methodology work completed in 2007. His talk includes Listing Methodology topics and their resolutions, why and how listing methodology for Colorado works, how often this work is done, differences between M&Es, TMDLs, EPA's categories. Phil brings with him a long history and knowledge base of Water Quality issues.

### May 9

Tracy Yager, a hydrologist with the U.S. Geological Survey in Denver, has worked for this federal agency for almost 20 years. She has 13 years of experience with scientific studies related to biosolids and other domestic sewage, and has been the project manager of biosolids-related studies for the last 12 years. Tracy holds a B.S. degree in Geology, a M.S. in Environmental Science and Engineering, and a Professional Certificate in Technical Communication. Tracy's presentation on May 9th will summarize the various U.S. Geological Survey studies and key

results to date for organic wastewater compounds related to biosolids.

Lynette Myers and Dave Akers will speak about the Colorado Environmental Leadership Program (ELP) for Colorado. This voluntary program is designed to recognize and reward organizations and businesses that demonstrate superior environmental performance. Membership is open to all types of organizations and businesses – large corporate entities to small businesses, government agencies, nonprofits and academic institutions. Lynette and Dave will offer information about eligibility and tier levels. Come hear about the regulatory and non-regulatory benefits and incentives of becoming involved.



### June 13

This month we've scheduled two topics of interest for wastewater employees. First, Steve Gunderson, Director of the Colorado Water Quality Control Division, will bring an update on the activities, policies and changes in the Division during the last six months. This is one not to miss!

After Mr. Gunderson, Dennis Stowe, Manager of the Littleton/Englewood (L/E) WWTP will discuss Antidegradation. The L/E plant discharges into the South Platte River, Segment 14, classified as a "Reviewable Stream" which requires Antidegradation review for permit standards.

## Miss a Recent CWWUC Meeting?

You can access the minutes of our recent meetings via our web site. <http://www.cwwuc.org/>

### CONTACT US:

Phone: Paul Ferraro – 303.904.2177

Email: Jeannie Bowser - [admin@cwwuc.org](mailto:admin@cwwuc.org)



Doug Kemper, Executive Director for the Colorado Water Congress speaks with CWWUC about wise management and stewardship of Colorado waters

## Mentoring Mentoring Mentoring

The Colorado Water & Wastewater Mentoring Program brings together the expertise from one utility or individual and the needs of another utility or individual to find solutions to problems.

The Mentoring Program is designed to provide online (Post a Question) and personal (Peer to Peer) mentoring services to water and wastewater utilities in Colorado with water and wastewater problems, compliance issues, watershed activities, standards-related issues and other problems.

**It's free!**

Visit [www.cwwuc.org/mentoring](http://www.cwwuc.org/mentoring) or contact Paul Ferraro, 303-904-2177.



CWWUC and RMWEA present

## Annual Permit Negotiations Workshop

Wednesday, May 16, 2007  
9:00 AM to 3:00 PM

Location: North Branch Library  
(Blue River Room)  
Silverthorne, Colorado

This workshop will provide valuable information on preparing for the discharge permit renewal process.

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**WHO should attend?**

City administrators

Wastewater facility managers

Plant operators

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For more information contact:  
Paul Ferraro, 303.904.2177

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