



 **Colorado Wastewater Utility Council**
Serving Colorado's Water Quality and Treatment Needs

CONFLUENCE

www.cwwuc.org

3rd Quarter - 2007

Are We Moving Too Fast on Nutrient Criteria?

The CWWUC recently sent a letter to Steve Gunderson, Colorado Water Quality Control Division Director, regarding concerns on moving too quickly to develop nutrient criteria before the much-needed research is completed.

We've printed *excerpts* of the letter here. To read it in its entirety please go to our website at www.cwwuc.org and click on <http://cwwuc.org/GundersonLtr.pdf> or contact Nancy Keller at 719.553.2862 to receive a copy.

The Colorado Wastewater Utility Council (Council) would like to take this opportunity to share its concerns with you over the current status of the development of statewide nutrient criteria (table values) for surface waters. It is our understanding that the Water Quality Control Division (Division) is committed to proposing nutrient basic standards for lakes/reservoirs and rivers/streams for consideration by the Colorado Water Quality Control Commission (Commission) at the 2010 Basic Standards Rulemaking Hearing.

Because nutrient removal from wastewater treatment facilities can be very costly, the Council is concerned that adoption of unrealistic nutrient table values will result in the development of numerous site-specific standards wherever there are discharges from wastewater treatment plants, even though such plants are not usually the major contributor of nutrient-related compounds to surface waters. Alternatively,

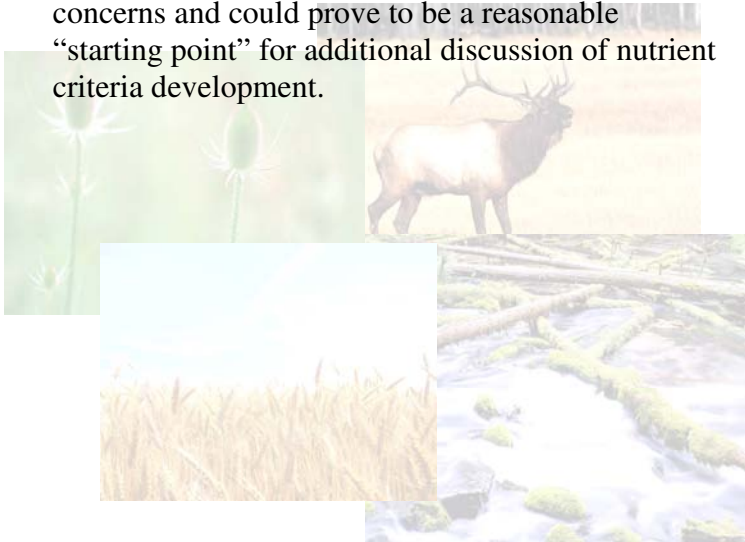
many water segments may end up on the 303(d) List if attainment is tied to nutrient standards that do not take site-specific factors into consideration. It is also important to note that the contributions of unregulated non-point nutrient sources, such as agriculture and residential fertilizers, have not been factored into the workgroup discussions to date.

...the Council recommends that the Division consider raising the following issues in the workgroup to make the development and implementation of nutrient criteria and standards credible, scientifically supportable, realistic, and practical:

- Does it make sense to develop statewide standards for nutrients (including rivers and streams), when the issues related to supporting beneficial uses (particularly water supply) are so site-specific that they could be addressed more effectively and efficiently on a site-specific basis, perhaps through control regulations?
- Are inputs of nutrient sources from sources other than wastewater treatment facilities (agriculture, dog parks, individual sewage disposal systems, horse boarding facilities, golf courses, Confined Animal Feeding Operations, etc.) being monitored and evaluated?
- Do site-specific water management practices affect the nutrient levels in reservoirs more or less than point or non-point loadings?

Because of these issues, the Council would like to suggest the workgroup discuss the possibility of adopting narrative nutrient criteria in the Basic Standards. This approach could build upon the

existing “free from” language in section 31.11; however, there would need to be discussion regarding implementation timing since narrative criteria usually are adopted as standards throughout the state upon approval by the Commission in the Basic Standards. The Council believes that discussion of this possible alternative approach in the workgroup may address various stakeholder concerns and could prove to be a reasonable “starting point” for additional discussion of nutrient criteria development.



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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.

July 11

Greg Farmer, Process Specialist at the Littleton/Englewood WWTP directs the process control activities of the wastewater treatment system by evaluating plant performance. This

month Greg will be presenting an overview of Automated Process Control & Online Monitoring systems in place at the plant. Greg will describe how online instrumentation is used for real time process control and the challenges of ensuring the instruments are calibrated. There will also be a desktop display demonstrating the use of ORP (oxygen reduction probe) for chlorination and samples of the instruments used in the plant.

LITTLETON / ENGLEWOOD
Wastewater Treatment Plant

August 8

The August meeting will again highlight another Littleton/Englewood WWTP staff person. **Dennis Stowe**, Manager of the plant will present a talk on the Anti-degradation regulation and guidance: **From the Water Quality Assessment to Permit Limits**. His years of experience in managing a wastewater treatment plant will provide a thought provoking view of the challenges of balancing the regulations against operating the third largest treatment plant in the state.

September 11



The tradition of the CWWUC is to hold the September meeting at the annual RMWEA conference. This year’s conference is being held at the Keystone Resort and Conference Center. Several CWWUC members are slated to speak at the conference. If you can attend, be sure to stop by the CWWUC information table which will be on display with membership, mentoring and organizational information. To register for the conference go to <http://www.rmwea.org/> and click on **Annual Conference** on the left hand side. We hope to see you there at the breakfast meeting on September 11!

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.

303D Listing Methodology — May 15 the Commission approved the 303(d) 2008 Listing Methodology proposal. This group has no more meetings scheduled.

Agricultural Diversions — This workgroup is exploring issues related to oil and gas exploration water which impacts agriculture. As written, the policy developed by this workgroup may impact all NPDES permits. See the CWWUCs' letter to Dave Akers on our website and the draft policy on the WQFs' website listed above. Facilitated by Gary Beers CDPH&E, 303.692.3524, gary.beers@state.co.us and coordinated by Landon Gates, Colorado Farm Bureau, 303.749.7516, lgates@colofb.com. For more information please contact one of the above.

Spill Control — is continuing to develop guidance and regulations regarding spills and spill reporting--mainly "spills that impact state waters" If interested in 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 — Facilitator Chris Theel CDPH&E, is your contact for more information or to get involved in this group. Call Chris at 303.692.3558 or email him at Christopher.Theel@state.co.us for updates.

Nutrient Criteria — Watch the website for times and dates. From the website 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, Nutcrit Schematic, Nutrient Criteria Plan](#). **The Division has announced they will be developing river nutrient standards for the 2010 Basic**

Standards! (Read our letter to Steve Gunderson on page one)

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

Regulation 61 —This workgroup has been discussing issues and concerns regarding CDPS permits. Janet Keiler is 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. To view the Issues **List 2007** go to the Water Quality Forum website and click on the link.

Membrane Treatment— 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 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.



Mentoring - Connecting Needs to Knowledge

- Building a knowledge and experience base of water and wastewater professionals with areas of expertise in technology, operations, process control, planning, laboratory, regulations, permitting, maintenance and so on.
- 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.
- Become a Mentor and help others (Mentees) find solutions to problems.
- **It's free!**
- Visit the New Program: www.cwwuc.org/mentoring or contact Paul Ferraro at 303.904.2177.

Statewide Ammonia Standards

The hearing for the Ammonia Standards Rulemaking was concluded in March 2007. Final decisions for regulations #32, #33, #36, #37 and #38 (5 CCR 1002-32, 33, 36, 37 and 38), can be found on the Commission's website at <http://www.cdphe.state.co.us/op/wqcc/WQClassandStandards/Ammonia/Ammonia.html>. In addition there are copies of the final draft Statements of Basis and Purpose. The proposed effective date for the revisions to each regulation is September 1, 2007.

The Council encourages Managers and Operators of Colorado wastewater treatment plants to begin making decisions about how these standards will impact your future CDPS permit limits. What actions will be necessary to meet the standards?

You can contact the CDPH&E personnel for assistance at the ***Water Quality Control Division Contacts:***

Permitting Questions – Lynn Kimble, 303.692.3615
Lynn.Kimble@state.co.us

Standards Questions – Sarah Johnson, 303.692.3609
Sarah.Johnson@state.co.us

AMMTOX Questions – Eric Oppelt, 303.692.3608
Eric.Oppelt@state.co.us

Access our mentoring website to sign up for assistance on how to get started with the process. Don't procrastinate and be too late!!

www.cwwuc.org/mentoring



Miss a Recent CWWUC Meeting?

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

Contact us :

Phone : Paul Ferraro—303.904.2177

Email : Jeannie Bowser admin@cwwuc.org

SECTION 303(D) LISTING METHODOLOGY 2008 LISTING CYCLE

The Listing Methodology for Colorado is reviewed and updated on a biennial basis in anticipation of 303(d) List and M&E List development. Most often revisions or additions to the Listing Methodology derive from issues which were raised during the previous Listing process. The Listing Methodology is revisited and revised with the intent of clarifying the Division's procedures for assessing attainment of those uses and standards assigned by the Commission to Colorado waters.

The 2008 Listing Methodology was approved by the Commission on May 15, 2007. The Wastewater Utility Council board encourages everyone to go to the Commission's website at [http://www.cdphe.state.co.us/op/wqcc/SpecialTopics/303\(d\)/303dLM2008.pdf](http://www.cdphe.state.co.us/op/wqcc/SpecialTopics/303(d)/303dLM2008.pdf) to review the full document. There may be a listing item which will impact your river segment or lake/reservoir. If you have questions they can be directed to Phil Hegeman at 303.692.3518 or pjhegema@smtpgate.dphe.state.co.us.



CDPH&E Monitoring Policy

The Division has issued a policy for determining the monitoring frequency required in permits. "Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Industrial, and Domestic Wastewater Treatment Facilities", effective 5/1/07. It can be found on the Division's website at:

<http://www.cdphe.state.co.us/wq/PermitsUnit/PolicyandGuidance/guidanceandpolicy.html>

This policy is intended to replace the previous policy from 1989 in order to consistently apply monitoring requirements to facilities of similar size. It is important that every facility review this document carefully to determine the effect it will

have. The policy states that the provisions for reductions in monitoring frequency require ambient water quality monitoring that is made accessible to the public as well as evaluation of enforcement history and evaluation of permit compliance. The Council was assured by Dave Akers and Andrew Neuhart at the June CWWUC meeting that reductions shown in this policy do not require ambient monitoring. Additional reductions may be given for ambient monitoring. We encouraged the Division to edit the policy to state this clearly. Reduced monitoring may be denied if the facility discharges to a water body that contains Threatened or Endangered species, or a water body designated as critical, discharge to a segment designated as a drinking water source, or discharge to segments on the Divisions 303(d) or monitoring and evaluations list.

Workshop Attendees Learn about Permit Process

The Permit Negotiation Workshop held May 16th, 2007 at the library in Silverthorne, Colorado was a great opportunity for current and potential members of the CWWUC to network, exchange ideas, and learn about a subject that isn't usually found in operations manuals. The relaxed atmosphere and scenic surroundings of the event made it easy for participants to ask questions and become involved in the presentations.

The event was co-sponsored by the CWWUC, RMWEA, CRWA, and CWQCD. Originally designed to provide information to small utilities outside driving distance of Denver, the workshop has turned into a must-attend for any operator, manager, or administrator interested in the permitting process. Nearly 40 people were in attendance representing all sizes of wastewater utilities throughout the state.

The seminar started with visiting and networking over breakfast. The group then heard presentations from a wide range of industry sectors. Paul Grundemann and Dennis Stowe gave attendees a

good look at the permitting process from a permit-holder's perspective. Their insights, learned through experience as wastewater managers, provided the group with lessons in subjects including permit do's and don'ts, effective negotiating, and post permit activities like modifications and amendments.

District Engineer Andy Poirot and Domestic Permits Unit Manager Andrew Ross provided the CDPHE permitting perspective. They discussed the role of the District Engineer and assistance available throughout the course of NPDES activities. They also gave an overview of the permit application, and rationale along with an account of compliance, and enforcement programs. Jennifer Richards of CH2MHill provided an update of important permit-related issues from the consultant's point-of-view. Topics included issues such as TMDL's, watersheds, and pollutant trading.

Some key lessons from Paul Grundemann and Dennis Stowe's presentations at the Permit Negotiation Workshop included:

- **Be involved in the permitting process from the beginning to end**
- **Collecting site-specific data can help you get the most appropriate limits**
- **Read and know your permit**
- **The discharge permit is a legally binding document**



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

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