

Board of Trustees meeting which option was finally chosen by the staff or what had been approved by federal regulators as well as the state. Strom has suggested at several previous meetings that Monument Sanitation District take the lead in investigating what constituents the town is plan-

ning to discharge to MSD pipes for further treatment at TLWWTF. See www.ocn.me/v16n11.htm#mbot1017, www.ocn.me/v16n12.htm#tlfjuc1108, www.ocn.me/v17n1.htm#tlwtfjuc, www.ocn.me/v17n4.htm#mbot.

Wicklund distributed copies of the two letters at the April 11 meeting and thanked Strom for his suggestion. Strom said he wished the town was being more responsive and would talk to MSD. Smith asked, "Does that mean (the town doesn't) feel like they are going to impact the wastewater treatment plant at all?"

Wicklund said he did not know if town staff or engineers were aware of the variety of potential problems associated with the wastewater treatment plant permit and the extent of how complicated current and future streams and reservoirs' water quality regulations are as proposed by the state Water Quality Control Division (WQCD). As an example of the looming unknowns, he read part of a draft

responsive prehearing statement from the facility's environmental attorney Gabe Racz that will be submitted on behalf of TLWWTF to the state Water Quality Control Commission (WQCC) for a June rulemaking hearing about concerns on proposed temperature, chloride, or sulfate standards.

Wicklund said that if the town is really considering doing indirect potable reuse and wanting to pump TLWWTF effluent to a new discharge point in Crystal Creek upstream of Monument Lake, another potential problem was that the chemical treatment used by TLWWTF to remove phosphorus, as required by its discharge permit, could cause secondary odor and taste problems in a direct use water supply, which is regulated by Colorado Reg. 31, the Basic Standards and Methodologies for Surface Water.

Currently, this is not a problem since TLWWTF is so far upstream from the closest drinking water reservoir, Pikeview Reservoir, which is on Monument Creek at Garden of the Gods Road.

However, the Upper Monument Creek Regional Wastewater Treatment Facility (UMCRWWTF), which serves Donala, Triview, Forest Lakes, and soon Academy Water and Sanitation District, is already impacted. UMCRWWTF has always had to meet stricter instream water quality discharge regulations than TLWWTF due to its closer proximity to Pikeview Reservoir as the first wastewater discharger upstream of Pikeview on Monument Creek, said Jim Kendrick, MSD's environmental compliance coordinator.

Kendrick said WWSO's current intake point on Monument Creek at Arnold Avenue, downstream of Monument Lake, follows "rivers and streams" categorization. But he said that WQCD engineer Bret Icenogle was emphatic at the WQCC meeting on April 10 that if TLWWTF added a discharge point upstream from Monument Lake, the lake's classification as a headwaters lake would be lost and it would then be treated the same as any other "reservoir or lake" downstream

of a wastewater treatment plant discharge point, with profoundly stricter regulations. This would also mean that more restrictive state regulations would apply to TLWWTF effluent, which is discharged solely downstream of Monument Lake now, than currently apply to TLWWTF. "If we allow a discharge point into Crystal Creek from this facility, it will be a self-inflicted wound," Kendrick said.

These issues would be in addition to the separate qualms about side-effects of nutrients in drinking water reservoirs that Wicklund expressed in March. See www.ocn.me/v17n4.htm#tlwtfjuc.

"Without planning and working together, I am afraid what is going to happen is the town is going to put a lot of money into design and possibly even construction and then come to find out we are not going to allow discharge from this facility up to Crystal Creek for these very reasons," Wicklund said.

The JUC did not discuss the next action to take. However, Wicklund said the letter from Lowe would be discussed at the MSD board meeting on April 19.

Stakeholder meeting updates

Burks reviewed the events at the April 4 Arkansas River/Fountain Creek Coalition for Urban/Rural River Evaluation (AF CURE) meeting. The members elected Mark Shea of Colorado Springs Utilities as chairman, and Kendrick and Andra Ahrens of the City of Pueblo as vice chairs, for the extensively revised organizational model for the stakeholder group. Engineering consultant Brown and Caldwell will remain the executive director of AF CURE operations, but AF CURE will now have an organizational structure parallel to that of the "parent" Pikes Peak Regional Water Authority (PPRWA).

Kendrick reported key results from the March 20 Water Quality Forum and the April 10 WQCC meetings, including:

- Staffing shortages continued to reduce the effectiveness of the WQCD Water Quality Standards Unit.
- Due to a lack of data after 11 years of work on river and stream temperature standards, the only parameter defined is temperature transition zones based on elevation differences.
- Right now, nearly every wastewater treatment facility in the state would be in violation of the temperature standards that the division had originally proposed if they were enacted; EPA's proposed standards are even more restrictive and unattainable.
- Aquatic life is driving the WQCC's proposed Reg. 31.17 interim values on total phosphorus and total nitrogen, even though in June 2016 the EPA formally declared that any regulations based on the state's aquatic life regime are legally indefensible in court and formally "took no action" to approve Regulation 31.17 nutrient interim values in September 2016.
- The WQCD used up its entire annual analytics budget for "one-time snapshot" sampling of downstream



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