

olution as presented.

Lincoln Financial named plan administrator

District Manager Jessie Shaffer told the board that no administrator has been named to manage the district's 457 B retirement plan, and asked that they appoint Lincoln Financial to play that role. Plan administrators review documents, research laws and rules, and ensure compliance, Shaffer said, adding that since Lincoln Financial manages the investments that underlie the retirement plan, it is well positioned to

take on this role.

According to Shaffer, Lincoln Financial will not charge the district for its services as plan administrator.

The board voted unanimously to approve Lincoln Financial as plan administrator.

Operational Report highlights

- Shaffer told the board that bank erosion along Fountain Creek is threatening the district's augmentation station and should be addressed. The district is working with a consultant to develop a

strategy, he said.

- Assistant District Manager Randy Gillette told the board he is researching the district's unaccounted water measurement. Gillette believes the system is "in good shape," but many of the meters are approaching their end-of-life date and may not be reporting accurately.

- The district is planning for a new well to be drilled in the Misty Acres development. The district is working through the bidding

process with well drilling companies, Shaffer said, and will work to minimize the inconvenience to nearby homeowners.

The next meeting is scheduled for March 8 at 1 p.m. Meetings are usually held at the district office at 1845 Woodmoor Drive on the second Thursday of each month at 1 p.m. See www.woodmoorwater.com or call 488-2525 to verify meeting times.

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Tri-Lakes Wastewater Treatment Facility Joint Use Committee, Feb. 13 State inspection results reported

By Lisa Hatfield

On Feb. 13, the Tri-Lakes Wastewater Facility (TLWWTF) Joint Use Committee (JUC) heard about the quality of its operation, results of a biennial state inspection, and more on stakeholder groups advocating on their behalf with regulators.

TLWWTF operates as a separate joint venture public utility and is owned in equal one-third shares by Monument Sanitation District (MSD), Palmer Lake Sanitation District (PLSD), and Woodmoor Water and Sanitation District (WWSD).

The three-member JUC acts as the board of the facility and consists of one director from each of the three owner districts' boards: WWSD board Director at Large Rich Strom, president; MSD board Chairman Ed DeLaney, vice president; and PLSD board Director Pat Smith, treasurer/secretary. Other board and staff members of the three owner districts also attended, including MSD District Manager Mike Wicklund, PLSD District Manager Becky Orcutt, and WWSD Assistant District Manager Randy Gillette.

Facility manager's report includes inspection results

Facility Manager Bill Burks presented the monthly Discharge Monitoring Report (DMR) for December. The DMR is submitted to both the EPA and the Colorado Department of Public Health and Environment. This DMR's sampling results were well within the required parameters of the facility's effluent discharge permit as usual. He also said the facility's annual metals scan results were "pretty consistent with last year's, and all good."

Burks said that in both December

and January, the influent flow was at 28 percent of its 4.2 million gallons per day (MGD) capacity as normal. He reported that the biological oxygen demand (BOD), or waste solids loading, was at 78 percent of the facility's rated capacity of 5,600 pounds per day capacity for December, and back to normal at 60 percent of this rated solids treatment capacity for January.

Paul Hanson, senior field engineer with Division 2 of the Water Quality Control Division (WQCD) in Pueblo, performed the biennial WQCD inspection of the TLWWTF. Burks said Hanson told him that the calculation Burks has been using for the 30-day and seven-day BOD averages percentages of organic capacity was incorrect, but if Burks submitted the revised calculations by the end of February, dating from May 2015 to the present, it would only be considered a minor permit violation instead of a major one. Burks told the JUC he had already done the new calculations, and all the new numbers are very close to the old ones, sometimes higher and sometimes lower. He said the new formula would be more likely to point out a one-day spike in either flow or organic loading, which might have been smoothed out in a 30-day average.

Burks said Hanson explained that the facility's permit states that if it exceeds 80 percent of organic capacity BOD for the one-month average, Burks is required to report it in a letter to WQCD. He was referring to the sampling numbers from October, which indicated a jump in BOD to 90.3 percent of TLWWTF's rated BOD capacity. See www.ocn.me/v17n12.htm#tlwtf, www.ocn.me/v18n1.htm#tlwtf.

The consensus of the JUC was that Burks should collect data from additional BOD samples during the month beyond the two that are required, in case there is an unusual BOD spike on the day of the sample, to show that kind of loading is a rare occurrence.

Note: The Colorado Water Quality Control Act requires that if a facility has more than three individual months in a row at 80 percent of either of these two rated capacities, it would be required to start engineering design for expansion construction to meet the higher influent waste solids treatment demand.

Burks said the facility passed this quarter's Whole Effluent Toxicity (WET) test without any problems.

Looking ahead to future regulations

TLWWTF has budgeted \$19,804 in 2018 for its contribution to the Arkansas River/ Fountain Creek Coalition for Urban/Rural River Evaluation (AF CURE) budget to continue AF CURE's stakeholder advocacy work for the facility. TLWWTF is one of AF CURE's 11 members. AF CURE is a sub-group of the Pikes Peak Regional Water Authority (PPRWA).

Jim Kendrick, who is a vice-chair of AF CURE and MSD environmental compliance coordinator, was a co-founder of AF CURE in 2012. He said AF CURE, with the help of environmental engineers Brown & Caldwell, responds effectively at state stakeholder workgroup meetings. "It takes money to go out and collect samples to prove you are not contributing to the problems," he said. But the state continues to "play 'Lucy and the football' with new requirements and that's why there is mission creep in AF CURE."

Burks and Kendrick described the new regulatory storm clouds on the horizon, and hearings coming this spring, that could affect TLWWTF. These could include:

- New statewide standards for chlorophyll 'a' will be finalized in 2022, although they might not allow for variations in geography, sandy vs. gravel stream bottoms, and cold-water vs. warm-water streams, which all affect algae growth, in addition to the variable non-point source nutrients from agriculture, commercial animal feeding operations, stormwater runoff, and permitted discharge facilities.
- Heat can be considered a pollutant, since the temperature of streams affects fish spawning. TLWWTF's effluent actually cools the stream, but other facilities have less effluent detention time, which could warm the stream.
- Possible new rules relating to how close alluvial wells can be placed to water wells.

Kendrick described "moving target" issues discussed by stakeholders at the Colorado Wastewater Utility Council (WWUC), including:

- Legislative efforts to regulate waste generated by the oil and gas fracking industry that contains Technologically Enhanced Naturally Occurring Radioactive Material (TENORM) threaten to spread and encompass municipal wastewater treatment facilities unless a robust stakeholder process is adopted to ensure attainable, affordable, and sustainable wastewater facility expansion requirements.
- WWUC's members support doing two more years of Arkansas River Basin temperature studies, collecting data to prove that actual seasonal stream temperature graphs are sinusoidal, that will never comply with the current abruptly stair-stepped monthly temperature limits that regulators want to impose.
- Possible new state restrictions to minimize the effects of corrosion in water and wastewater pipes.

The JUC voted unanimously to contribute \$1,000 toward the continuation of the WWUC temperature technical assessment committee study. They anticipate a similar contribution soon toward a study related to TENORM.

The meeting adjourned at 11:32 p.m.

The next meeting is scheduled for 10 a.m. March 13 at the Tri-Lakes Wastewater Treatment Facility, 16510 Mitchell Ave. Meetings are normally held on the second Tuesday of the month and are open to the public. For information, call Bill Burks at 719-481-4053.

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