

and Sanitation District (WWSO). The three-member JUC acts as the board of the facility and

consists of one director from each of the three owner districts' boards: WWSO board Director

at Large Rich Strom, president; MSD board Chairman Ed Delaney, vice president; and PLSD board and JUC Secretary/Treasurer Ken Smith. Other board and staff members of the three owner districts also attended, including MSD District Manager Mike Wicklund, PLSD District Manager Becky Orcutt, and WWSO Assistant District Manager Randy Gillette.

new TP clarifier process performance will last through Oct. 31, 2019, and then the new TLW-WTF discharge permit limit of 1 mg/liter for TP begins on Nov. 1, 2019.

Burks also noted that downstream of the Tri-Lakes plant there is a lot of wildlife, there is no overabundance of algae, and existing ambient phosphorus levels are already so low that he wondered what would happen when the new total phosphorus (TP) chemical removal clarifier actually started treating the influent wastewater for phosphorus.

Wicklund said that the total phosphorus and total nitrogen sampling readings numbers for Monument Creek downstream of the plant are so low, even now, it could be possible that there would be no need to treat nitrogen in the Tri-Lakes plant in the future.

Burks said TLWWTF passed its second-quarter Whole Effluent Toxicity (WET) test, but the third-quarter WET test "was not a failure, but it did not pass, either." He will report back to the JUC in September on how the staff will react to this unexpected out-sourced testing result.

Burks has scheduled a follow-on multiple metric index (MMI) aquatic life study to be performed by GEI Consulting in September in Monument Creek. MSD Environmental Compliance Coordinator Jim Kendrick said it is important to have consistency with GEI doing studies for the facility, because GEI is the "gold standard for the state" and is also doing studies for Arkansas River/Fountain Creek Coalition for Urban/Rural River Evaluation (AF CURE), South Platte Coalition for Urban River Evaluation (SP CURE), Colorado Monitoring Framework (CMF), and "everything east of the Front Range."

WWSO maintenance

As part of the district manager reports, Gillette said that WWSO had taken four days to divert Monument Creek flows around its exchange structure near the Arnold Avenue bridge in order to dig out and remove accumulated sediment from the structure. WWSO's pump house, which pumps WWSO's surface water up to Lake Woodmoor, is located

just south of the west end of the bridge, adjacent to the northwest corner of the Tri-Lakes facility. (The TLWWTF effluent discharge into Monument Creek is located downstream of the WWSO structure at the southwest corner of TLWWTF.)

This project increased WWSO's ability to draw surface water from the stream to Lake Woodmoor from about 75,000 to 500,000 gallons per day, Gillette said. He said some residents worried about the diversion work causing damage to the beaver dam in the vicinity of where the work was done, but the beavers rebuilt the dam almost immediately after it was impacted by the diversion.

Permitting issues continue to pop up

Kendrick reported on regional and statewide stakeholder meetings and the possible implications for both TLWWTF and the permitting process controlled by the Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division.

Kendrick said that at the August meeting of AF CURE, Coordinator Sarah Reeves, environmental engineer and vice president of Brown & Caldwell, briefed members on the choices they need to make in deciding what computer model to choose for the most cost-efficient proposed river basin nutrient modeling project to generate meaningful results to go along with two years of nutrient data already collected by AF CURE member operators.

Kendrick reported that Tammy Stone of Brown & Caldwell alerted AF CURE members of an issue discussed at the August CMF meeting that raised questions about how permits might be issued in the future for all dischargers. Without scientific justification, the Division has proposed granting 5 million gallons a day of additional rated treatment capacity to the Littleton/Englewood (L/E) wastewater treatment plant although it has no way to treat that additional discharge, since it would be coming from Denver and going directly into the South Platte River downstream from the L/E plant.

After the meeting, Kendrick said that another wastewater treatment entity concern is that since all state discharge permit fees are based on rated flow capacity rather than average existing flows, this unprecedented non-legislatively-enacted action would incur a unilateral fee increase on Littleton-Englewood, and potentially any of the other 390 wastewater treatment plants in Colorado. Historically, any discharge permit fee increase is controlled solely by the elected/recallable members of the state Legislature, and TABOR.

Mary Gardner, the compliance coordinator for L/E, told the CMF that in Denver, the recent and ongoing construction of many three- and four-level deep subterranean garages is displacing a lot of groundwater that

Plant manager's report
Facility Manager Bill Burks reviewed the June discharge monitoring report (DMR). He and the members discussed one spike in dissolved manganese at one Monument Creek testing site, but overall results were well within the required parameters.

Burks said construction of the total phosphorus (TP) chemical removal clarifier expansion is nearing the end. He hoped for final approval from the Tri-Lakes Monument Fire Protection District on a few new construction edicts soon. Chemicals for this TP clarifier will cost an estimated \$200,000 a year. The compliance testing period in the plant's discharge permit for optimizing the

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