

must be dewatered from the sites and that the Division wants some way to account for direct deposition of many untreated contaminants into the South Platte River due to this additional growth and development in Denver.

Kendrick said the groundwater being pumped out does not meet state stream standards and is full of metals and is so toxic that it is not disposable in a sustainable way in an urban setting by the owners of these new multi-story buildings. It is not clear what entity, if any, would actually treat the toxic groundwater that could be discharged directly into the South Platte River downstream from L/E or why Denver's wastewater treatment facilities are not the ones getting the new discharge permit.

Kendrick said many CMF members agreed that this Division proposal to grant an upstream discharger extra capacity in order to force lower discharge permit limits and expensive plant modifications on wastewater treatment plants simply to accommodate commercial growth and development downstream by allowing ever increasing amounts of uncontrolled non-point pollution should not set a precedent for future discharge permit calculations. AF CURE voted unanimously to formally oppose the Division's proposal and support CMF's objections, which will be represented to the state by Brown & Caldwell at no additional cost to AF CURE members.

Note: This is the same Division that, as part of CDPHE, grants all permits for point-source dischargers such as wastewater treatment plants. This reporter heard CDPHE representatives tell AF CURE members in May that the state would clamp down harder on point-source dischargers that are already easily meeting E. coli regulations, since it "can" regulate them. However, the Water Quality Control Division cannot regulate non-point sources such as stormwater or agricultural runoff that washes E. coli, pesticides, fertilizers, and other human-caused pollutants into waterways. See www.ocn.me/v16n6.htm#tlfjuc0510.

Kendrick said several notable things happened at the August Colorado Water Quality Control Commission (WQCC) meeting. One was that the final draft of the WQCC triennial rulemaking hearing on Regulation 31, Basic Standards and Methodologies for Surface Water, and Regulation 61, Colorado Discharge Permit System Regulations, were approved without changes. See www.ocn.me/v16n8.htm#tlwfjuc0712.

Also, the WQCC unanimously disapproved Cherokee Metropolitan District's request for a site-specific waiver for a concentration limit of 500 milligrams per liter (mg/l) for Total Dissolved Solids (TDS) for its treated wastewater effluent. Cherokee's modified application for a 500 mg/l waiver noted that the Environmental Protection Agency (EPA) has established a national "Secondary Drinking Water Standard" for TDS of 500 mg/L.

TDS can include potassium, chlorides, sodium, arsenic, chromium, manganese, nitrates and other substances dissolved in the water. A standard definition for "dissolved solids" is that they must be small enough to pass through a 2-micron filter. (Contaminants larger than 2 microns are

often referred to as Total Suspended Solids, and these are also monitored closely by dischargers.)

The commission also unanimously rejected a counter proposal to Cherokee's initial request for a 600 mg/l waiver by the Water Quality Control Division for a site-specific waiver concentration limit of 448 mg/l for TDS, also less than the national EPA TDS standard. (ftp://ft.dphe.state.co.us/wqc/wqcc/2016/41_42RMH/)

Cherokee's effluent contains an average of roughly 400 mg/l of TDS, so it has not been meeting Cherokee's existing 300 mg/l state permit limit. Cherokee's effluent is also more saline than it should be. Currently, it is discharging this treated effluent directly into the ground, outside its own basin and service area, where it is sequentially contaminating downstream irrigation and drinking water wells in the Black Squirrel aquifer farther east of Colorado Springs, Kendrick said.

Cherokee was also petitioning to pump the treated effluent deep into underground wells, but this was also unanimously denied by the WQCC on Aug. 8. At first, the Division tried to work out a compromise by increasing the TDS permit limits to 448 mg/l so Cherokee could meet them, but eventually the Division rejected the proposal and left the TDS limit at 300 mg/l.

Cherokee's only option now is to build a \$30 million reverse osmosis (RO) treatment plant to decontaminate the effluent by extreme filtration, which also creates a very toxic HAZMAT RO brine that is costly to dispose of, as a perpetual added operational cost. It will have to raise its rates substantially very soon to save money to pay for this plant, Kendrick said.

Burks added that TLWWTF risks having higher TDS levels in its effluent when it starts using alum (hydrated potassium aluminum sulfate) to treat for phosphorus. The TLWWTF permit already has a TDS permit limit, so continuing TDS testing during the compliance testing period will provide a clearer picture once he starts operation of the TP clarifier.

Kendrick said the effect of TDS is additive as you go down the stream. Metals do not get consumed by in-stream

plants and aquatic life the way they consume nutrients like TP and TN. Kendrick also said he wondered if the Division might decide to require an earlier implementation of the new 1 mg/l TP permit limits that are not officially taking effect until Nov. 1, 2019 if Burks' compliance testing of the TP clarifier is completed before that implementation date.

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