

no impact on anybody else. That should be included in your scope of work with the town.

MSD Environmental Compliance Coordinator Jim Kendrick's comments included:

- We are just trying to be transparent with you so that we don't come up against a start date where we have not had a chance to do all the necessary MSD and TLWWTF engineering work and research. It's a lot better when everybody is working toward the same goal.
- So far we have heard nothing from the town about what radium treatment methods are being considered.
- TENORM is federally regulated, and this pretreatment might involve Al Garcia of the Environmental Protection Agency (EPA) Region 8 Pretreatment Unit.

Questions that were asked, with answers desired at the expected January meeting that Sams would be coordinating, included:

- Was the \$100,000 Colorado Rural Water Association (CRWA) grant the town applied for going to be used for hydrous manganese oxide (HMO) treatment or for ion exchange treatment?
- Would the Colorado Department of Public Health and Environment (CDPHE) come to MSD and/or TLWWTF directly to have Wicklund and/or Burks sign off on any kind of treatment?
- Would the town be paying for TENORM testing at TLWWTF since the town is creating this new requirement, not MSD?

The consensus of the JUC members was to start doing its own baseline radionuclide testing in January before it is required as self-protection. The members gave Burks several suggestions on other entities to consult with that already had experience with radium. Gillette said that baseline testing should be paid for by the JUC, not the town, since it was just to see where the plant was with Naturally Occurring Radioactive Material (NORM) (not federally regulated) before the Town of Monument did any treating of radium into TENORM.

**Plant manager's report**  
Burks said CDPHE had just changed its position on when TLWWTF had to start testing and treating for phosphorus ahead of its new TP limits, which take effect on Nov. 1, 2019. The facility's discharge permit states that it has to meet the rolling annual median (the median for the previous 12 calendar months) on that date, but without 12 months of prior data, it would have no annual median to report to CDPHE on the TLWWTF Discharge Monitoring Report.

Burks said \$200,000 in chemicals could be saved if he waited until November 2019 to

start treating for phosphorus with the new TP clarifier expansion, but Wicklund said it made sense to start treating ahead of time to make sure the plant would not have a violation in the first month of its new permit, would have enough monthly data for an annual median, and had been already proven to operate reliably in all kinds of weather.

**Colorado Wastewater Utility Council report**

Multiple metric indexing (MMI) aquatic life studies have been used for over a decade to assess the biological response of fish and macro invertebrates to nutrients in different stream segments. Members of organizations such as the Arkansas River/Fountain Creek Coalition for Urban/Rural River Evaluation (AF CURE) and SP CURE (South Platte) have paid for numerous independent studies using both U.S. Geological Survey and CDPHE standards to collect and publish MMI and instream

concentration data to show CDPHE whether the nutrient levels, including various forms of nitrogen and phosphorus, are affecting the naturally occurring amount and variety of aquatic life species in a given stream segment. The basic premise of the CDPHE policy is that the "more" aquatic life of preferred types, the healthier a stream segment is, whether it is a warm, low-flow, shallow, sandy bottom stream such as Monument Creek or a cold, fast-flowing alpine stream above Lake Dillon.

However, Kendrick said that at the Colorado Regulation 85 Nutrient Management Stakeholder Work Group meeting on Nov. 1, Water Quality Control Commission Administrator and state attorney Trisha Oeth told the stakeholders that the EPA has declared MMI "not scientifically valid" for setting the interim nutrient values of Reg. 31.17. See [www.ocn.me/v16n12.htm#tlfjuc1108](http://www.ocn.me/v16n12.htm#tlfjuc1108).

Despite this news, Chris

Theel of the CDPHE Water Quality Control Division Standards Unit talked about the proposed extension and expansion of Aquatic Life Policy 10-1 at the Colorado Waste Water Utility Council on Nov. 9. Theel's message was that CDPHE is working on recalibrating the MMIs requirements, including increasing the spectrum of which type of aquatic life and what quantity of each type of organisms indicated that a stream was "healthy" and that they planned to increase the number of different organisms tested for by 67 percent. Kendrick reported this new set of standards would be done with no accommodation for variations in the state's eight separate geographical regions.

Kendrick said this MMI recalibration would directly impact the replacement interim values for TP and total nitrogen stream standards, which would affect TLWWTF's discharge permit in the near future.

"Mike (Wicklund) and at-

torney John Hall and I have been doing this for seven years," Kendrick said, referring to stakeholder attempts to inform and solidify decisions from CDPHE so that stakeholders such as TLWWTF could plan future capital investments without having the requirements increased as the years go by, causing the upgrades to be insufficient by the time they are built. Stakeholder groups also keep advocating for requirements that make sense for each specific discharger's location, geology, naturally-occurring stream aquatic life, temperature, etc. as well as being achievable, affordable, and sustainable with reasonable user fees.

Kendrick and Wicklund said that Hall, who used to work with nutrient stakeholders in the Colorado Nutrient Coalition and the Colorado Rural Communities Coalition that Kendrick and Wicklund helped create, now will be working with the Trump administration to attempt to re-

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