

In any case, the town would then withdraw an equal amount of Monument Creek stream water at the Arnold Avenue bridge, upstream of TLWWTF. This withdrawn creek water would then have to undergo more town treatment to reach drinking water standards before entering the town's water distribution system, west of I-25.

Racz summarized that for the town to start indirect potable reuse, it was likely that the town would need to build two treatment plant upgrades, a pump station, and a pipeline. He said the idea was similar to one already in use by the Parker Water and Sanitation District. However, the big difference was that in that case, Parker owns all the com-

ponents: Parker's drinking water, the wastewater treatment plant, the reservoir, and the drinking water treatment system. "It's simpler to figure out."

The potential owners and/or decision-makers for this town water reuse initiative would include several different entities: the town of Monument; the TLWWTF JUC, which has three representatives from the boards of MSD, PLSD, and WWSD; the Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division (WQCD); and the CDPHE Water Quality Control Commission. The commission issues discharge permits to dischargers that are subject to complicated and variable regulations based on factors including:

- Whether the new town discharge point constitutes a "new facility" that would be subject to stricter discharge standards.
- The precise location of the town discharge point, particularly if it is upstream of Monument Lake, which is a direct-use drinking water source and would thus also invoke even stricter discharge standards on the town.

In a lengthy technical discussion with the group, Racz emphasized it would be important to figure out who owns what, who would operate what, and who would pay for which pieces of the puzzle for the proposed water reuse plants. Some questions raised by the group included:

- Would TLWWTF need another discharge permit at the new discharge point upstream?
- Would TLWWTF be the permit-holder and be responsible for meeting all the state regulations?
- Or would the Town of Monument go into the wastewater business and get its own discharge permit?
- How would Colorado's Basic Standards and Methodologies for Surface Water Regulation 31 and Nutrients Management Control Regu-

lation 85 be applied by the WQCD in the site approval and design review process for any of the possible scenarios?

The key concerns of Racz and the JUC included which total phosphorus (TP), copper, and chlorophyll 'a' limits might be applied, and how a new discharge point would inevitably further tighten TLWWTF's current and already tighter future strictly-regulated discharge standards. He also voiced a question about a likely anti-degradation review of Monument Creek that would occur for a new discharge point, which could also have a significant financial impact on TLWWTF because the facility would lose the biotic ligand model exemption for copper that it won in the 2013 Regulation 32 Arkansas River Basin triennial hearing. TLWWTF would again have to meet the much lower and currently unattainable table-value copper standards because the existing TLWWTF discharge pipe would no longer be the first discharge into Monument Creek from its headwaters. The total cost of attaining the biotic ligand model exemption for copper was \$500,000, which would be lost in all three town-proposed options.

Racz said water suppliers like the Town of Monument are not in the wastewater business and do not fully

understand how long the state permitting process will take, which would vary based on which discharge point is selected. "It takes months to get site approval, design approval, and preliminary effluent limits.... You can't be in a hurry.... If they want treatment to occur here (at TLWWTF), they need to come to you (the JUC) and ask how that is going to work out." He said the problem was that the JUC members know about all these potential problems and questions, but the town does not know.

Wicklund said he is a town resident and was concerned that the town was spending hundreds of thousands of dollars on engineers that it could have saved by just visiting a JUC meeting and asking questions. Strom said that if the town came to the JUC with at least a conceptual design, then the JUC could help brainstorm. MSD had invited the town in a letter in April, but the ball was now in their court, he said. See www.ocn.me/v17n5.htm#tlwtfjuc.

Other nutrients topics, nutrient regulations, and more

As MSD environmental compliance coordinator Jim Kendrick has explained at many past JUC meetings, Racz discussed the other big issue facing TLWWTF in the next 10 years: discharge effluent nu-

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open house

Join us for our annual open house on August 5th from 3:00-5:30 PM. This is a free event open to the public, but some activities will be an additional charge.

