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Emily Wong, P.E.
Water Quality Control Division | Engineering Section
Colorado Department of Public Health & Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

December 8, 2022

RE: COG590148 Milner WWTP Site Application RFI Responses

Dear Ms. Wong,

We received the Request for Information letter dated December 5, 2022, related to your review of the Site Application prepared by AquaWorks DBO. The following are our responses:

- 1) Provide additional information to clarify the approach to correcting the infiltration and inflow issues, and the timeline to implement these improvements and confirm the proposed I&I reduction project will be sufficient to maintain the flow to the wastewater treatment facility to below 80% of the permitted capacity over the life the of project.**

The project includes construction of both a new wastewater treatment facility as well as collection system rehabilitation and repairs. The project scope includes lining the existing collection system pipeline with CIPP liner over 100% of the collection system. Therefore, at completion of the project, I&I will be minimal. The new treatment plant and the collection system repairs will be constructed concurrently during the 2024 construction season. Milner's historical growth has been minimal. Over the last 40 years, Milner added 50 people to create its current population of 250 people. The proposed wastewater design flow capacity is 32,500 GPD. At the 80% threshold, the flow is 26,000 GPD. The current flow per capita is 68 gpd/person which is slightly below the standard planning numbers of 75 to 100 GPD/person. Since the collection system will be repaired in its entirety and to follow CDPHE Design Criteria planning standards, a planning flow rate of 75 gpd/person is used. Based on 26,000 GDP and 75 GPD/person, the Milner's population that can growth to 346 people, or an additional 96 people. Based on historical growth and the anticipate of continued minimal growth, the design capacity of 32,500 GPD is expected to be adequate for the life the project.

- 2) Discuss the strategy to address meeting the arsenic limit.**

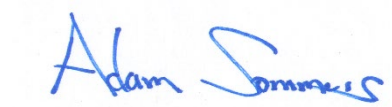
The discharge permit contains a 0.02 ug/L arsenic limit that becomes effective January 1, 2028. Our understanding is that all surface water discharge permits will have the same limit. Routt County intends to use the compliance period between now and 2028 to work with the Division to find and implement a solution for meeting the limit.

Ms. Emily Wong
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Please feel free to contact me directly at (303) 477-5915 with any questions.

Sincerely,

AQUAWORKS DBO, INC.

A handwritten signature in blue ink that reads "Adam Sommers". The signature is written in a cursive, flowing style.

Adam Sommers, P.E.
cc. Routt County