

December 5, 2022

B. Scott Cowman Routt County - Community of Phippsburg 136 6th Street, Suite 201 Steamboat Springs, CO 80487

Subject: Site Location Application - Request for Information

Routt County - Community of Phippsburg, Wastewater Treatment Plant Improvement Project

Colorado Discharge Permit System (CDPS) No. COG591184 (formerly COG588141)

Routt County

GLU Project No. 150460W, ES Project No. ES.22.SA.06869

Dear Scott Cowman:

The Water Quality Control Division (Division) has reviewed the WWTP Improvement Project Site Application submitted by AquaWorks DBO on behalf of Routt County - Community of Phippsburg. Based on the Division's initial review, the site location application does not meet the requirements of the Water Quality Control Commission's *Site Location and Design Regulations for Domestic Wastewater Treatment Works*, 5 CCR 1002-22 (Regulation 22) and cannot be approved at this time. For additional information, please refer to the Implementation Policy for Regulation 22, which is available at the following Link.

The review process for this project has been placed on hold pending resolution of the following issues:

1. In accordance with Section 22.10(1)(c)(xiv) of Regulation 22, the engineering report must discuss water quality planning targets developed in accordance with section 22.6(1)(b)(iii). The Colorado Discharge Permit System permit COG591148 dated November 2, 2022 includes an arsenic limit of 0.02 ug/L, effective on January 1, 2025 and a sulfide limit of 0.066 mg/L effective as of the effective date of the permit (December 1, 2024). The submittal does not appear to describe how the limits for arsenic and sulfide will be met. Please discuss the strategy to address arsenic and sulfide affecting the proposed wastewater treatment facility, including sources and potential treatment at the new mechanical MBR treatment plant.

Please submit a written response to this letter that addresses the identified issues. Following receipt of your response submission, the Division will resume review work on the project. Thank you for your time and cooperation in this matter. If you should have any questions, please contact me by phone at 303-692-3566 or by email at emily.wong@state.co.us.

Sincerely,

Emily Wong, P.E.
Senior Review Engineer
Engineering Section
Water Quality Control Division
Colorado Department of Public Health & Environment

cc: Adam Sommers, AquaWorks DBO
Amy Zimmerman, AquaWorks DBO
Jay Harrington, Routt County
Michael Emming, WQCD Engineering Review Unit Manager
James Wheatley, WQCD Grants and Loans Unit Project Manager
Associated Colorado Discharge Permit System (CDPS) No. COG588141 and COG591184; Routt County Community of Phippsburg

