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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 14, 2022

RE: COG591184 Phippsburg 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 is our response:

1) Discuss the strategy to address meeting the arsenic limit and sulfide limit.

The discharge permit contains a sulfide limit of 0.066 mg/L. Sulfide is a reduced form of sulfur and requires an anaerobic environment to form or must be chemically reduced. The proposed MBR treatment process is highly oxygenated including the final steps through membrane filtration. The sludge holding tank is also aerated so recycle flows will not include reduced forms of chemicals including sulfide. Finally, there will be no chemical addition after filtration; therefore, sulfide cannot be formed in the treated effluent.

The discharge permit contains a 0.02 ug/L arsenic limit that becomes effective January 1, 2025. Our understanding is that all surface water discharge permits have this same limit. AquaWorks DBO has reviewed this situation with the Standards Unit and they agree that meeting this limit is not attainable. For example, the CDPHE's accepted PQL (Implementation Policy CW 6) is 1 ug/L. As such, it isn't possible to measure down to 0.02 ug/L.

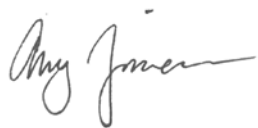
The feedback we have received is that the Division is working on a state-wide solution so every surface water discharge is not in violation. One possibility could be using the PQL of 1 ug/L as the reporting limit, but other options are also being looked at. Our understanding is that until the long term solution is being determined projects can still move forward though the approval process. If that is not the case, the Division would not be able to approve any Site Applications for surface water discharges.

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

Sincerely,

AQUAWORKS DBO, INC.

Ms. Emily Wong
December 14, 2022
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A handwritten signature in black ink, appearing to read "Amy Zimmerman". The signature is fluid and cursive, with a horizontal line extending from the end.

Amy Zimmerman, P.E.
cc. Routt County