



Draft Minutes

Monday, November 9th, 2020

1. Introductions

2. Guest speakers

- a. **Al Garcia, Region 8 EPA - Industrial Pretreatment** – Al will be available to answer questions about PFAS and will also be willing to provide the same presentation that he gave on September 30th if the members would like.
 - i. Al's goal is to give information to all of the POTWs on PFAS
 - ii. Meg suggested getting someone from Michigan to talk about how they are managing PFAS. Such as a facility that has gone through the source water investigation that they have done.
 - iii. Colorado Industrial Pretreatment Association has done training on source water investigation.
 - iv. What is considered pass-through – it is anything that causes a violation. There are currently no limits in Policy 20-1. There are no permit limits currently. When there are permit limits, it will then apply. The current concern is to determine if there is a loading that is coming into and going through the plant. The best way to look at it right now is not in the IP definition of pass-through.
 - v. Meg said that notification should only occur when there is a significant slug loading, such as caused by a fire being extinguished, should be reported. They want this so that they can notify drinking water plants downstream. For instance, above 70 ppt should be notified. Be conservative.
 - vi. Al's goal is to provide more outreach to utilities that do not have approved IP programs.
- b. **Meg Parish (CDPHE)** – State updates
 - i. 10-year Water Quality Road Map meeting - November 12th.
 - ii. Dredge and fill stakeholder process meeting is coming up on January 7th.
 - iii. PFAS discharger survey is up now - <https://www.colorado.gov/pacific/cdphe/PFCs/PermitSurvey>
 - iv. Issues Formation Meeting – The result was that the Commission is moving with the Divisions proposal. The Commission said that it will move on to the hearing but no major decisions as of yet.



c. Gabe Racz – Reg. 22 updates

- i. The guidance development process is winding down. Comments from CWWUC were submitted on the last draft of the divisions implementation policy. There was a meeting with Meg about the water quality planning targets guidance portion of this. The end result was to get some improvements to the alternatives process.
- ii. The next step is a final Division policy.
- iii. Gabe suggested that the council meet with the Division Director – put together a list of topics to talk to Division management about issues that have come up. The overarching theme could be figuring out how to get the Division to focus more closely on water quality goals rather than individual goals.
- iv. The State Administrative Procedure Act has a rules and application of rule has to be used at the time of permit renewal. The Division put out a draft policy that says that everything we do in the water quality program is an exception to that. If it is necessary to comply with federal rules than they can use a later rule. Other rule changes are not necessarily so. The statute allows the Division to make individual findings about the applicability of rules on a permit by permit basis. Comments on this are due December 1st.
 1. Gabe estimates that it will cost approximately \$2500 (not to exceed).
 2. A motion was made – and Julie seconded. Nobody opposed.
- v. Gabe thinks that there are a few comments that should be made on I&I in permits, such as what is the threshold for when an I&I study has to be done. The study plan still makes it sound like you have to eliminate 25% of the sources within four years. Gabe suggested language wherein the permittee provides a plan for eliminating I&I based on what is possible. A question was asked if there were suggestions about what should go into the letter that was prepared by Gabe and sent around for review.
- vi. Eagle River got an extension for comments to the 25th of November. Gabe intends to put together comments in cooperation with Eagle River.



3. Board Action Items

- a.** Approval of invoices for payment: All approved
 - i.** Corona Environmental Consulting: \$1,295
 - ii.** Vranesh & Raisch: \$1,005.50
 - iii.** Colorado Monitoring Framework: \$1,670.98
- b.** Approval of October minutes: Approved
- c.** Approval to have Form 990 prepared by Rose Melville, CPA not to exceed \$300:
Approved

4. Discussion items

- a.** TNORM – The council did not choose to join in the COGA letter. Met with Jim Grice to go over a few things there was some concern that there was hazardous waste disposal that they were coming up with their own requirements which was concerning.
- b.** There was a utility that had problems with the GAMA spec for radon
- c.** Rule-making hearing is November 18th - Metro sent a letter with some outstanding concerns and are awaiting hearing from them ahead of the hearing.
- d.** Feedback for CDPHE on collection systems/I&I
 - i.** Centennial - Maybe
 - ii.** Colorado Springs – Maybe
 - iii.** Wes asked if we could get confirmation in the next two weeks and submit to Shonnie
- e.** Suggestions of topics for future meetings

Next Meeting: Wednesday, December 9th, 2020 at 1:00 pm