of a wastewater treatment plant would require more stringent regulations. This would also mean that more restrictive state regulations would apply to TLWWTF effluent, which is discharged solely downstream of Monument Lake, now that it already applies to TLWWTF due to its closer proximity to Pikes Peak Reservoir as the first wastewater discharger upstream of Pikes Peak on Monument Creek, said Jim Kendrick, MSD’s environmental compliance coordinator.

Kendrick said WWSD’s current intake point on Monument Creek at Arnold Avenue, downstream of Monument Lake, another potential problem was that the chemical treatment used by TLWWTF to remove phosphorus, as required by its discharge permit, could cause secondary odor and taste problems in a direct use water supply, which is regulated by Colorado Reg. 31, the Basic Standards and Methodologies for Surface Water.

Currently, this is not a problem since TLWWTF is so far upstream of Monument Lake, the lake’s classification as a headwaters lake would be lost and it would then be treated the same as any other reservoir or lake downstream of Monument Lake now, than currently apply to TLWWTF. “If we allow a discharge point into Crystal Creek from this facility, it will be a self-inflicted wound,” Kendrick said.


Kendrick reported key results from the March 20 Water Quality Forum and the April 10 WQCC meetings, including:

- Staffing shortages continued to reduce the effectiveness of the WQCD Water Quality Standards Unit.
- Due to a lack of data after 11 years of work on river and stream temperature standards, the only parameter defined is temperature transition zones based on elevation differences.
- Right now, nearly every wastewater treatment facility in the state would be in violation of the temperature standards that the division had originally proposed if they were enacted. EPA’s proposed standards are even more restrictive and unattainable.
- Aquatic life is driving the WQCC’s proposed Reg. 31.17 interim values on total phosphorus and total nitrogen, even though in June 2016 the EPA formally declared that any regulations based on the state’s aquatic life regime are legally indefensible in court and formally “took no action” to approve Regulation 31.17 nutrient interim values in September 2016.
- The WQCD used up its entire annual analytics budget for “one-time snapshot” sampling of downstream...