SP CURE Monitoring Committee Meeting – Meeting Minutes

Thursday June 9, 2022 – 10:00 a.m.

Meeting Location: Virtual
Link: Join Microsoft Teams Meeting

Call-In: (888) 404-2493; Conference ID 774 845 259#

High Level Take-Aways

- Questions remain regarding chlorophyll-a implementation. The Monitoring Committee discussed meeting with the Division to see where and how they could be supported in their efforts to characterize the relationship between nutrients and chl-a.
- The 2022 round robin will evaluate iron (total recoverable and dissolved) and sodium.
- The group discussed next steps for the arsenic analysis which will entail sending out a questionnaire to members regarding the use of non-detects and j-data, and an analysis evaluating arsenic loading to the South Platte.

Action Items

- BC to follow up with the Division to gage the potential for a chl-a coordination meeting.
- BC to send questionnaire to members regarding the use of non-detect and j-data, and to evaluate arsenic loading to the South Platte.

1. **Introductions**

   Caleb announced that he will be stepping down as Monitoring Committee representative for Thornton and will now attend Board meetings. Santiago Ramirez will now attend Monitoring Committee meetings.

2. **Discuss April meeting minutes**

   Approved

3. **Water quality workgroup updates**

   April Permits webinar:

   - Industrial stormwater permit (public comment closes June 13)
   - EPA draft PFAS and PFOS criteria is out for review; Currently in 30-day comment period. Final criteria expected 2023-2024.
   - New chemical evaluation resource and revised application

WQF May:

- Sean McGrath has retired and Trisha Oath will be acting Division director; Meg Parish will be leaving the permitting section
- Water Quality Control Commission Hearings:
    - San Juan/Gunnison hearing starts on Monday (and includes temporary modification updates)
    - Reg 38 special hearing – prehearing statement is out for public comment. Jim added that the proponents did not present new data. Metro is hoping SP CURE will be supportive of Metro's position. Regulatory decisions should be rooted in data, and the proponents appear to be drawing conclusions based on an incomplete dataset. The proposal could impact ratepayers (from Denver's perspective). The 12-parameter test ignores several factors that are driving aquatic life issues (e.g. endocrine disruptors, nutrients, temperature are not included).
- The direct potable reuse stakeholder process is complete, and the hearing will be in October
- Lead and copper stakeholder group will be kicking off early this summer

10-year roadmap:

- Lakes nutrients TAC update summary
- Voluntary incentive program
    - Division is prepping for the November 14-15 Reg 85 rulemaking
    - Only minor changes to VIP and Reg 85 are expected
    - Division proposal due June 30 – accepting comments until June 24th
- Chl-a implementation
    - The Division posted SP CURE's questions and responses: they don't intend to list any segments until 2025 and if they are listed, they wouldn't write any TMDLs until 2027.
    - The Monitoring Committee agreed that we want to see more of the Division's data; Where will future data come from? It's a complicated parameter. The Division's SOP doesn't make sense for a river like the South Platte because it is not wadable. Jim added that the standard is unachievable.
        - Amanda Jensen: focus on high-level conclusions. The benefit of a workgroup could be to focus on the end goals
        - Blake admitted that they need to do more work to draw conclusions between the relationship between nutrients and chl-a.
        - Invite Amy to an SP CURE meeting? Or Amanda? We could volunteer to help. We could offer to help test those numbers. Perhaps an in-person meeting.
            - **Action item to follow up with Aimee. A lot of the data was older (from 2013)**

Temperature workgroup: concluded with an updated WQP-23

- Main goal of the Division was to update WQP-23 to align with changes to Regulation 31
- Discussed alternative approaches: RP, warming event, 316(a) waivers, and WQ trading
- Commission directive to consider the warming event methodology was more or less ignored
- Division is open to working with permittees on a case-by-case basis

Colorado Monitoring Framework

- **May all-member meeting** Discussed temperature alternatives; recent permitting issues; chemical evaluation approval process; PFAS
- **PFAS Source Identification Workgroup:** kick-off meeting is scheduled to identify the problem and brainstorm solutions
- **PFAS biosolids stakeholder group:** ~180 people. Permittees are concerned that the Division may follow the Michigan guidance, which has a lot of industrial inputs than Colorado.

4. **Feedback from partnerships/projects discussion with the Board**

   How did it go? The Board agreed to approach it with an E&O frame of mind. Board will be updating the SP CURE one-pager.

5. **Discuss next steps for arsenic analysis**

   a. Revisit next steps for non-detect/overlapping data

      The group agreed to generate and send a questionnaire to the group asking:

      - How do you report and/or use non-detect and J-data? Regulatory and internally
      - What MDL/RL are you using (for arsenic)

      How does the Division use data for permitting? It is not statistically valuable to report zero for a non-detect

   b. Revisit source characterization including geologic sources and tributary loading

      Next steps are to look at locations where we have flow and arsenic data. Jordan has data in a spreadsheet. Erin will have BC's intern complete that task. Jon added that DDPHE samples all of their tributary data at the confluence with the South Platte River. S29 and Cherry Creek at Denver both have gages. Division of Water Resources has a gage at 19th street. 64th avenue; for tribs, they monitor at the mouth of Big Dry, Sand, and Clear Creek.

      DDPHE has a summer intern who has expressed interest in looking at how bedrock in direct contact with streams impacts water quality. There may be opportunity for the intern to present to the Monitoring Committee in August.

6. **Round Robin planning**

   The group brainstormed some options for the 2022 round robin. While it would be valuable to evaluate chl-a and PFAS, these would be tough parameters to include. The group thought that some sort of coordinated instream PFAS sampling in the future could be benenficial.

   The 2022 round robin parameters will be iron (total recoverable and dissolved) and sodium. Previous parameters include:

   - 2021: Field parameters (temperature, pH, conductivity, DO) and Arsenic (diss and total recoverable)
   - 2019: orthophosphate, TDS, ammonia
   - 2017: Field pH, chloride, nitrate
   - 2016: Total phosphorus, Arsenic (diss), electrical conductivity
   - 2015: Specific conductivity, phosphate, arsenic
   - 2012: Arsenic, phosphate, nitrate/nitrite
   - 2011: Ammonia, selenium, *E. coli*
   - 2009: Phosphate, cadmium, *E. coli*

- 2008: Nitrate, selenium, total dissolved solids (TDS)
- 2001: Ammonia, copper, nitrate
- 1999: Ammonia, nitrate
- 1998: Nitrate, ammonia, phosphate

7. **Check-Ins**

   a. **Colorado Data Sharing Network** – Jordan

   No updates

   b. **Water Connection/Greenway Foundation Updates** – Jon

   The USGS project to assess the effectiveness of planned Corps of Engineers projects on improving instream habitat is moving forward. We are working on a Joint Funding Agreement and hope to be able to start work later this year. It looks like DTU will be supporting our efforts with fish surveys coupled with some eDNA work.

   The Corps projects are moving along at a steady clip. The 1135 CAP project (between south Denver County limits and Evans) is at 35% design. Work includes work on some of the riffles in the reach, removal of invasive species and replacement with natives, and extensive modification of the Harvard Gulch – South Platte confluence. Denver is trying to get the Corps to allow the City to manage design and construction of the Denver reach project instead of the usual model in which the Corps does the work. We believe that will allow for faster delivery of the project and a design which better reflects the City's interests. The current plan is to have all work completed in six years.

8. **New Business**

9. **Next Meeting Dates**

   Monitoring Committee Meeting – August 11, 2022: In-person Round Robin?
   Monitoring Committee Meeting – October 13, 2022: Virtual

Meeting Attendees		
Present	Name	Organization
	Juliana Archuleta	Adams County
	Zach Trabold	City of Aurora
	Nick Tino	Centennial Water and Sanitation District
X	Jon Novick	Denver Environmental Health
	Al Polonsky	Denver Environmental Health
	Curt Bauers	FRICO
X	Jim Dorsch	Metro District
X	Jordan Parman	Metro District
	Shay Shih	City of Thornton
X	Caleb Owen	City of Thornton
	Christine Johnston	Xcel Energy
	Eric Marler	Suncor Energy
	Ben Wise	South Platte Water Renewal Partners
	Jake Kunugi	Coordinator - Brown and Caldwell
X	Erin Donnelly	Coordinator - Brown and Caldwell

Minutes prepared by Erin Donnelly