



December 28, 2023

Bruce Thelen
Jellystone Park at Larkspur
27777 Franklin Rd, Suite 200
Southfield, MI 80118

Subject: Site Location Application - Request for Information
Jellystone Park at Larkspur, WWTP Expansion
Colorado Discharge Permit System (CDPS) No. COX631080
Douglas County
ES Project No. ES.23.SA.08073

Dear Bruce Thelen:

The Water Quality Control Division (Division) has reviewed the Jellystone Park at Larkspur's WWTP Expansion Site Application and July 2023 Process Design Report submitted by Integrated Water Services, Inc. on behalf of the Jellystone Park at Larkspur (System). 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 22.3(1)(b) of Regulation 22, while evaluating the suitability of a proposed site location for a domestic wastewater treatment works, the Division shall determine that the proposed domestic wastewater treatment works will be managed to minimize the potential adverse impact on water quality and in accordance with the applicable water quality planning targets. The System received a Compliance Advisory - Reported Effluent Violation letter dated November 17, 2023 indicating significant noncompliance with effluent permit limits for total inorganic nitrogen, total phosphorus, and total dissolved solids. The process design report evaluates the updated facility effluent for total inorganic nitrogen and total phosphorus, but does not appear to indicate upgrades associated with, or the design effluent concentration for total dissolved solids. Please provide a discussion and associated documentation identifying treatment upgrades or other measures necessary to meet the effluent limit for total dissolved solids.
2. In accordance with Section 22.7(1)(c)(iii) of Regulation 22, the engineering report must include an analysis of the loading, capacity and performance of the existing treatment works. As further defined in Section 22.7(1)(c)(iii) of the Implementation Policy for Regulation 22, a loading analysis includes a causal analysis for any discharge limit exceedances. The process design report indicates that the purpose for treatment upgrades is to accommodate site conditions and operational data developed over the life of the facility to date (i.e. waste loading to the plant), but does not elaborate on how the site conditions and operational data caused effluent violations. Based on a review of Discharge Monitoring Reports (DMR), there have been several violations of effluent limits in the past three (3) years that occurred in almost each month of the year. Please provide a discussion of potential causes for permit effluent violations and include corrective measures implemented to achieve permit compliance.
3. In accordance with Section 22.7(1)(c)(iv) of Regulation 22, the engineering report shall address an analysis of alternatives meant to treat the additional loading including any consolidation alternatives recommended in the approved regional water quality management plan. The System's March 10, 2022 response letter to a Compliance Advisory - Reported Effluent Violation indicates a parallel effort to improving the existing plant involves evaluating consolidating with Perry Park Water and Sewer District. The process design report does not appear to address treatment technology alternatives or whether consolidation is a feasible option. Please provide a discussion regarding alternative treatment analysis evaluated and the feasibility of consolidating with Perry Park Water and Sewer District.



4. In accordance with Section 22.7(2) of Regulation 22, the applicant is responsible for submitting the application and engineering report for the increase in the design capacity of the domestic wastewater treatment works to all appropriate local governments, 208 designated planning and management agencies, and state agencies for review and comment prior to submission to the Division. The process design report does not appear to include documentation that the application to increase capacity was submitted to Douglas County Public Health Department or the Chatfield Watershed Authority. Please provide documentation that the process design report is submitted to all appropriate local governments, 208 designated planning and management agencies, and state agencies for review, including but not limited to Douglas County Health Department and the Chatfield Watershed Authority, and provide any received comments and associated resolutions.

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 review. Thank you for your time and cooperation in this matter. If you should have any questions, please contact me by phone at 720-383-7290 or by email at anthony.kerr@state.co.us.

Sincerely,

Anthony Kerr
Senior Review Engineer
Engineering Section
Water Quality Control Division
Colorado Department of Public Health & Environment

cc: Jeff Snyder, Integrated Water Services, Inc.
Karla Kinser, Kisner Membrane Solutions, LLC.
Caitlin Gappa, Douglass County Health Department
Diane Kietly, Chatfield Watershed Authority
Alan Leak, Respec
Emily Wong, WQCD Engineering Review Unit Manager
Mandy Mercer, WQCD Clean Water Enforcement Unit
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