

STATE OF COLORADO

Bill Ritter, Jr., Governor
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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

August 31, 2010

Certified Mail Number: 7009 1680 0000 2094 4879

PWSID# CO-0118665

Mr. Joel Meggers, District Manager
Ravenna Metropolitan District
c/o Community Resource Services of Colorado, LLC
3855 No. Lewiston Street, Suite 140
Aurora, CO 80011

RE: Service of Drinking Water Enforcement Order, Number: DN-100831-1

Dear Mr. Meggers:

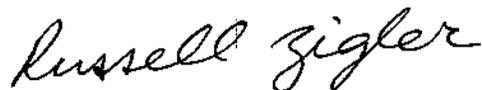
Ravenna Metropolitan District is hereby issued the enclosed Enforcement Order (the "Order"). This Order is issued by the Colorado Department of Public Health and Environment, Water Quality Control Division (the "Department") pursuant to the authority given to the Department by §25-1.5-203 of the Colorado Revised Statutes ("C.R.S."). The Department bases this Order upon findings that Ravenna Metropolitan District has violated the *Colorado Primary Drinking Water Regulations* (the "Regulations") as described in the enclosed Order.

As a recipient of an Order, Ravenna Metropolitan District may request a formal hearing to contest the Order in accordance with the Regulations, 5 CCR 1003-1, §1.6.7(g). Requests for such a hearing shall be filed in writing with the Department within thirty (30) calendar days after service of the Order. Such requests, at a minimum, shall contain the information specified in 5 CCR 1003-1, §1.6.7(g), and 5 CCR 1002-21, §21.4(B)(2). Hearings on Orders shall be held in accordance with applicable provisions of the State Administrative Procedure Act, Article 4 of Title 24, C.R.S., and the procedural rules promulgated in 5 CCR 1002-21.

This action could result in the imposition of administrative or civil penalties. The Department or a State District Court is authorized pursuant to §25-1-114.1, C.R.S., to impose a penalty of up to \$1,000 per violation per day. Please be advised that the Department is continuing its investigation into this matter and the Department may identify supplementary violations that warrant amendments to this Order or the issuance of additional enforcement actions.

Should Ravenna Metropolitan District desire to informally discuss this matter with the Department or if you have any questions regarding the Order, please don't hesitate to contact Lauren Worley at (303) 692-3547 or by electronic mail at lauren.worley@state.co.us.

Sincerely,



Russell Zigler, Legal Assistant
Enforcement Unit
Compliance Assurance Section
WATER QUALITY CONTROL DIVISION

Enclosure

- cc: Tri-County Health Department
Scott Monroe, 1086 Kenosha Dr., Larkspur, CO 80118
Paul Grant II, 1086 Kenosha Dr., Larkspur, CO 80118
Diane Miller, Community Resource Services of Colorado, LLC, 700 17th St., Ste. 2200,
Denver, CO 80202
- ec: Paul Kim, Engineering Section, CDPHE
Dick Parachini, Watershed Program, CDPHE
Lori Billeisen, Facility Operators Program, CDPHE
Shawn McCaffrey, EPA Region VIII



**COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
WATER QUALITY CONTROL DIVISION**

ENFORCEMENT ORDER

NUMBER: DN-100831-1

**IN THE MATTER OF: RAVENNA METROPOLITAN DISTRICT
PUBLIC WATER SYSTEM IDENTIFICATION NUMBER: CO-0118665
DOUGLAS COUNTY, COLORADO**

Pursuant to the authority vested in the Colorado Department of Public Health and Environment (the "Department") by §25-1-109 and §25-1.5-203 of the Colorado Revised Statutes ("C.R.S."), which authority is implemented through the Department's Water Quality Control Division (the "Division"), the Division hereby makes the following findings and issues the following Enforcement Order:

GENERAL FINDINGS

1. Ravenna Metropolitan District ("Ravenna MD") owns and/or operates a drinking water system located in Douglas County, Colorado (the "System").
2. Ravenna MD is a person as defined by 5 CCR 1003-1, §1.5.2(98).
3. Ravenna MD is a supplier of water within the meaning of §25-1.5-201(2), C.R.S., and its implementing regulation, 5 CCR 1003-1, §1.5.2(128).
4. The System is a public water system as defined by §25-1.5-201(1), C.R.S., and its implementing regulation, 5 CCR 1003-1, §1.5.2(107).
5. The Public Water System Identification Number ("PWSID") assigned to the System by the Department is PWSID #: CO-0118665.
6. Pursuant to 5 CCR 1003-1, §1.2, the System is subject to the *Colorado Primary Drinking Water Regulations* (the "Regulations"), which were adopted pursuant to §25-1.5-203, C.R.S.
7. The Ravenna MD provides piped water for human consumption from the System to at least twenty-five (25) of the same persons over six (6) months per year. The System is therefore classified as a "non-transient, non-community water system" as defined by 5 CCR 1003-1, §1.5.2(94).

8. The System's source of water is surface water as defined by 5 CCR 1003-1, §1.5.2(129).
9. The System serves a total daily calculated population of ninety-one (91) persons.
10. On March 19, 2010, a Division Representative conducted a compliance inspection of the System, pursuant to the Division's authority under §25-1.5-204, C.R.S. and 5 CCR 1003-1, §1.7, to determine the System's compliance with the Regulations.

First Violation
(Failure to Comply with the Maximum Contaminant Levels for
Total Trihalomethanes and Haloacetic Acids (five)

11. Pursuant to 5 CCR 1003-1, §2.4, Table 2-5(1) and (2), the maximum contaminant levels of 0.080 mg/L for total trihalomethanes ("TTHM") and 0.060 mg/L for haloacetic acids (five) ("HAA5") are applicable to all community/non-transient, non-community water systems.
12. Pursuant to 5 CCR 1003-1, §7.6.3(b)(1), the System must monitor for TTHM and HAA5 at the following frequency and locations:

Type of System	Minimum Monitoring Frequency	Sample Location in the Distribution System
Surface water or groundwater under the direct influence of surface water system serving fewer than 500 persons.	One sample per year per treatment plant during month of warmest water temperature.	Locations representing maximum residence time. If the sample (or average of annual samples, if more than one sample is taken) exceeds the MCL, the system must increase monitoring to one sample per treatment plant per quarter, taken at a point reflecting the maximum residence time in the distribution system, until the system meets criteria in paragraph (b)(1)(iv) of this section.

13. In a letter dated November 4, 2009, the Division increased Ravenna MD's monitoring to quarterly as a result of its August 17, 2009, TTHM and HAA5 maximum contaminant level exceedance.
14. Pursuant to 5 CCR 1003-1, §7.6.4(b)(1)(i), compliance with the maximum contaminant levels for TTHM and HAA5 must be based on a running annual arithmetic average, computed quarterly, of quarterly arithmetic averages of all samples collected by the system as prescribed by 5 CCR 1003-1, §7.6.3(b)(1).
15. Pursuant to 5 CCR 1003-1, §7.6.5(a), Systems required to sample quarterly or more frequently must report to the Department within ten (10) days after the end of each quarter in which samples were collected, notwithstanding the provisions of 5 CCR 1003-1, §1.6.4.
16. From calendar year 2009 to present, monitoring data submitted to the Division from the System establish the following TTHM and HAA5 running annual arithmetic averages for the System:

Total Trihalomethanes in mg/L				Running Annual Average in mg/L
1 st Q 2009 Sample not required	2 nd Q 2009 Sample not required	3 rd Q 2009 0.2584	4 th Q 2009 0.17583	0.109
2 nd Q 2009 Sample not required	3 rd Q 2009 0.2584	4 th Q 2009 0.17583	1 st Q 2010 0.113	0.137
3 rd Q 2009 0.2584	4 th Q 2009 0.17583	1 st Q 2010 0.113	2 nd Q 2010 0.153	0.175

Haloacetic Acids (five) in mg/L				Running Annual Average in mg/L
1 st Q 2009 Sample not required	2 nd Q 2009 Failed to monitor	3 rd Q 2009 0.11264	4 th Q 2009 0.18754	0.075
2 nd Q 2009 Sample not required	3 rd Q 2009 0.11264	4 th Q 2009 0.18754	1 st Q 2010 0.049	0.087
3 rd Q 2009 0.11264	4 th Q 2009 0.18754	1 st Q 2010 0.049	2 nd Q 2010 0.194	0.136

17. Pursuant to 5 CCR 1003-1, §7.6.4(b)(1)(iii), if the running annual arithmetic average of quarterly averages covering any consecutive four-quarter period exceeds the maximum contaminant level, the system is in violation of the maximum contaminant level and must notify the public pursuant to 5 CCR 1003-1, §9.2, in addition to reporting to the Department pursuant to 5 CCR 1003-1, §7.6.5.
18. Pursuant to 5 CCR 1003-1, §7.6.4(b)(1)(ii), if the result of fewer than four quarters of monitoring will cause the running annual average to exceed the maximum contaminant level, the system is in violation at the end of that quarter.
19. Ravenna MD's failure to comply with the maximum contaminant levels for TTHM and HAA5 constitutes violations of 5 CCR 1003-1, §2.4.

Second Violation
(Failure to Test and Maintain Containment Devices)

20. Pursuant to 5 CCR 1003-1, §12.1, a public water system shall control hazardous cross-connections and protect the public water system from contamination by implementing a cross-connection control program in the following manner:
 - a. Identifying potentially uncontrolled hazardous service cross-connections.

- b. Requiring system users to install and maintain containment devices on any uncontrolled hazardous service cross connections, provided the Department has determined that the device is consistent with the degree of hazard posed by the uncontrolled cross connection.
- c. Installation of containment devices shall be approved by the public water system upon installation.
- d. All containment devices shall be tested and maintained as necessary on installation and at least annually thereafter, by a Certified Cross-Connection Control Technician.

In addition, pursuant to 5 CCR 1003-1, §12.1(c), each public water system shall retain maintenance records for three years for all containment devices and these records shall be available for Department inspection.

- 21. During the March 19, 2010, Department inspection, the Division Representative noted that Ravenna MD was not able to provide documentation of annual testing of the back flow prevention devices within the water treatment facility.
- 22. In a letter reporting the results of the compliance inspection, dated May 3, 2010, addressed to the System, the Division Representative advised Ravenna MD of the requirement for the System to provide documentation of annual testing of the back flow prevention devices within the water treatment facility and requested Ravenna MD to ensure that it test and maintain all cross-connection devices on an annual basis in accordance with 5 CCR 1003-1, §12.1(b)(4). In addition, the Division Representative requested that the System provide a written response addressing these issues by May 27, 2010.
- 23. In a letter dated June 16, 2010, from the System to the Division, the System's representative advised the Division that the inspection of the water plant's backflow prevention devices had been scheduled and that these devices will be inspected annually (as required) and records of such inspections will be kept onsite.
- 24. Ravenna MD's failure to perform annual testing of the System's cross-connection containment devices constitutes violations of 5 CCR 1003-1, §12.1(b)(4).

COMPLIANCE REQUIREMENTS

Based upon the foregoing factual and legal determinations and pursuant to 5 CCR 1003-1, §1.6.7, Ravenna MD is hereby ordered to:

- 25. Immediately comply with the *Colorado Primary Drinking Water Regulations*, 5 CCR 1003-1, Articles 1 through 13.

Further, the Division hereby orders Ravenna MD to comply with the following specific terms and conditions of this Enforcement Order.

26. In order to ensure long-term compliance with the *Colorado Primary Drinking Water Regulations*, specifically including the TTHM and HAA5 maximum contaminant levels (Article 7) for public water supplies, Ravenna MD shall evaluate and upgrade, as needed, the System's water sources and/or treatment processes in accordance with the following schedule:
- a. The System submitted Final Design Plans and Specifications for the System improvements for Department review and approval in accordance with the *State of Colorado Design Criteria for Potable Water Systems* on May 25, 2010.
 - b. In a letter dated August 9, 2010, from the Division to the System and the System's contract engineer, the Department informed the System that the Final Design Plans and Specifications submitted by the System on May 25, 2010, were incomplete and could not be approved. By September 30, 2010, the System shall submit revised Final Design Plans and Specifications for the System improvements in accordance with the requirements set forth in the August 9, 2010, letter. A copy of the August 9, 2010 letter is attached hereto as "Exhibit A."
 - c. Within six (6) months after the date of Department approval of the Final Design Plans and Specifications for the System improvements, complete construction/implementation of the Department approved System improvements to ensure long-term compliance with the maximum contaminant levels for TTHM and HAA5.
 - d. Within ten (10) calendar days of construction/implementation completion, submit a Professional Engineer's Certification that the System improvements to comply with the maximum contaminant levels for TTHM and HAA5 were constructed/installed as approved by the Department.
27. In accordance with 5 CCR 1003-1, §9.2, Ravenna MD shall reissue a public notice each quarter for its ongoing TTHM and HAA5 MCL violations until Ravenna MD has demonstrated reliable and consistent compliance with the TTHM and HAA5 MCLs. Within ten (10) calendar days of completion of each required public notification, Ravenna MD shall submit to the Division, along with the mandatory certification, a representative copy of each type of notice distributed, published, posted, and/or made available to the persons served by the system and/or to the media.
28. Within thirty (30) calendar days after receipt of this Order, if it has not already done so, the Ravenna MD shall issue a public notice in accordance with 5 CCR 1003-1, §9.2, for its failure to perform annual testing of the System's installed cross-connection containment devices. Within ten (10) calendar days of completion of the required public notification, Ravenna MD shall submit to the Division, along with the mandatory certification, a representative copy of each type of notice distributed, published, posted, and/or made available to the persons served by the system and/or to the media.

*Additional guidance for proper public notification can be viewed at the following Internet location:
http://www.cdphe.state.co.us/wq/drinkingwater/pdf/PublicNotice/PN_Guidance_Mar2003.pdf*

29. Following System improvements and by no later than March 30, 2011, Ravenna MD shall provide a written description of how the System is implementing its cross-connection control program in compliance with 5 CCR 1003-1, Article 12. The written description should specifically include detailed information on how the System's utilized cross-connection containment devices are annually tested, maintained and how records of such activities are retain in compliance with 5 CCR 1003-1, §12.1(c).

A Sample Cross-Connection Control Program for Small Systems guidance document can be viewed at the following internet location: http://www.cdphe.state.co.us/wq/drinkingwater/pdf/cross_connection_control.pdf

NOTICES AND SUBMITTALS

30. For all documents, plans, records, reports and replies required to be submitted by this order, Ravenna MD shall submit an original and one copy (electronic is preferred) to the Division at the following address:

Colorado Department of Public Health and Environment
Water Quality Control Division / WQCD-B2-CAS
Compliance Assurance Section
Attention: Lauren Worley
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530
Email: lauren.worley@state.co.us
Fax: (303) 782-0390

(For any facsimile transmittals, please include a cover sheet addressed to Ms. Worley.)

31. All reports, notices, summaries, and certifications required to be submitted to the Department by the public water system must bear the original signature of the owner or the owner's authorized representative.

NOTICE OF COMPLETION

32. Ravenna MD shall submit a Notice of Completion to the Division upon satisfactory completion of all requirements of this Enforcement Order. The Division shall either accept or reject the Notice of Completion in writing. If the Division rejects the Notice of Completion, it shall include in its notice a statement identifying the requirements that the Division considers incomplete or not satisfactorily performed and a schedule for completion. If Ravenna MD wishes to dispute the Division's rejection of its Notice of Completion, it shall, within fifteen (15) calendar days of receipt of the Division's rejection, submit a written statement as to its belief of full compliance, addressing in detail all concerns the Division raised in the rejection letter to the System's Notice of Completion.

PRIOR APPROVAL REQUIRED

33. Pursuant to 5 CCR 1003-1, §1.11.2, no person shall commence construction of any new waterworks, or make improvements to or modify the treatment process of an existing waterworks, or initiate use of a new source, until plans and specifications for such construction, improvements, modifications or use have been submitted to, and approved by the Department. The Department shall grant such approval when it finds that the proposed facilities are capable of complying, on a continuous basis, with all applicable laws, standards, rules and regulations.

POTENTIAL ADMINISTRATIVE/CIVIL AND CRIMINAL PENALTIES

34. You are also advised, pursuant to §25-1-114.1, C.R.S., that violators of the Regulations or final Enforcement Orders issued by the Department are subject to civil or administrative penalties of up to one thousand dollars (\$1,000) per violation per day, to be imposed by the Department or a State District Court. Further, pursuant to §25-1-114(4), C.R.S., any person, association, or corporation, or the officers thereof, who violates, disobeys, or disregards any provision of the Regulations or an Enforcement Order is guilty of a misdemeanor and, upon conviction thereof, shall be punished by a fine of not more than one thousand dollars (\$1,000), or by imprisonment in the county jail for not more than one (1) year, or by both such fine and imprisonment and, in addition to such fine and imprisonment, shall be liable for any expense incurred by health authorities in removing any nuisance, source of filth, or cause of sickness. By virtue of issuing this Enforcement Order, the Department has not waived its right to bring an action for administrative, civil or criminal penalties and may bring such action in the future.

REQUEST FOR HEARING OR APPEAL

35. You are further advised, pursuant to 5 CCR 1003-1, §1.6.7(g), that a recipient of an Enforcement Order may request a hearing contesting such order. Requests for such a hearing shall be filed in writing with the Department within thirty (30) calendar days after service of the order. Such requests, at a minimum, shall contain the information specified in 5 CCR 1003-1, §1.6.7(g) and 5 CCR 1002-21, §21.4(B)(2). Hearings on Enforcement Orders shall be held in accordance with applicable provisions of the State Administrative Procedure Act, Article 4 of Title 24, C.R.S. and the procedural rules promulgated in 5 CCR 1002-21.

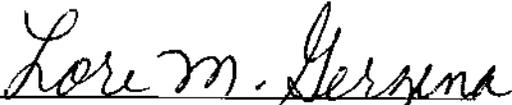
ADDITIONAL ACTION

36. You are further advised that under §25-1-114.1(1), C.R.S., the Department may institute a civil action against any person who violates a final Enforcement Order of the Department issued for violation of any minimum general sanitary standard or regulation adopted pursuant to §25-1.5-203, C.R.S.

37. Additionally, the Department may request the Attorney General to seek a temporary restraining order or permanent injunction to prevent or abate any violation of a minimum general sanitary standard or regulation adopted pursuant to §25-1.5-203, C.R.S. Further information concerning the aforementioned action is contained in §25-1-114.1(3), C.R.S.

Issued at Denver, Colorado, this 31st day of August 2010.

FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT


Lori M. Gerzina, Section Manager
Compliance Assurance Section
Water Quality Control Division

STATE OF COLORADO

Bill Ritter, Jr., Governor
Martha E. Rudolph, Executive Director

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Colorado Department
of Public Health
and Environment

August 9, 2010

Patrick Radabaugh, P.E.
Integra Engineering
1095 South Monaco Parkway
Denver, Colorado 80224

**Subject: Plan Submittal Review; Request for Information
Community Water System; Ravenna Metro District;
Public Water System Identification (PWSID) No. CO0118665;
Douglas County**

Dear Mr. Radabaugh:

The Water Quality Control Division (the Division) has received, and performed a review of the construction documents for the above referenced facility in accordance with Article 1.1.1.2 of the Colorado Primary Drinking Water Regulations (CPDWR) and State of Colorado Design Criteria for Potable Water Systems (Design Criteria).

At this time, the Division cannot approve the design of the water system because the information submitted to date is incomplete. The review process for this project has been placed on hold pending resolution and/or submission of the following items:

1. According to item 5.1.2. of the Bylaws, rules and Policies of the State Board of Licensure for Architects, Professional Engineers, and Professional Land Surveyors, the Colorado licensed professional engineer in responsible charge must sign and seal each sheet of engineering drawings, the cover, title page, and table of contents of specifications bound in book form, the title page of details bound in book form (when supplementing project drawings), and the title or signature page of engineering reports. The information provided with the design submittal was not stamped and signed in accordance with regulatory requirements. Please provide documentation that is signed and sealed by a registered P.E. in the State of Colorado in accordance with the regulatory requirements.
2. Item 1.1.2 of the Design Criteria requires that the plan submittal package include a completed Plans Review form. The design submittal did not include a Plans Review form. Please note that the Plans Review form found in the Design Criteria has been superseded by the Application Form found online at the following web address <http://www.cdphs.state.co.us/wq/engineering/pdf/AppForm.pdf>. Please complete the Application Form, including the necessary signatures from approval agencies, and submit a copy to the Division.

3. According to item 1.2.5 of the Design Criteria, the engineering report must include an implementation plan and schedule included estimated construction time and estimated start-up date. The engineering report indicates that there is a long term plan to add an enhanced coagulation pretreatment system. Please provide the anticipated schedule for implementation of the treatment. While the proposed disinfection change design may reduce disinfection by-products, the Division urges the system to implement best available technologies (BATs), such as the above-mentioned enhanced coagulation system, as soon as possible for removal of source water dissolved organic carbon.
4. In accordance with Item 7.1.2(c)(1) of the CPDWR, the disinfection treatment must be sufficient to ensure that the total treatment processes of that system can achieve at least 99.9 percent (3-log) inactivation and/or removal of *Giardia lamblia* cysts and at least 99.99 percent (4-log) inactivation and/or removal of viruses.
 - a. According to the engineering report, the system is proposing to utilize chlorination (free chlorine) in a 250 gallon contact pipe to achieve approximately 2.12 – 2.24 log of viral inactivation of the required 4 log. The remaining log removal required will be achieved through chloramination with contact time provided by the clearwell. According to the engineering report, a Hach CL17 total chlorine analyzer will be installed at the end of the contact pipe and prior to the ammonium sulfate feed. In order to ensure that the system is reliably and consistently achieving 4-log inactivation, the system must be capable of measuring free chlorine prior to the ammonium sulfate feed. Please specify how the system will monitor for free chlorine in order to comply with 4-log viral inactivation requirements.
 - b. The 4-log inactivation calculations provided in the engineering report are based on a design low temperature of 5 degrees Celsius (C). Surface water temperatures in Colorado can be below 5 degrees C during the winter months. Please provide a justification for the minimum design temperature including temperature data of the source water during the winter months.
 - c. The 4-log viral inactivation calculations and proposed disinfectant doses are based on achieving the minimum of 4-log removal and do not discuss operational controls or provide a factor of safety for varying conditions, which would require precise process control. Please specify how varying conditions will be factored into the treatment and control system dosing strategies to ensure that 4-log viral inactivation is achieved at all times.
5. In accordance with Part 7.1.5 of the Design Criteria, plans and specifications shall include operating and control procedures. According to the engineering report, the design ammonia dose is 0.5 mg/L for both the current membrane production flow rate of 115 gpm with a minimum free chlorine residual of 2.07 mg/L and for the expanded membrane production flow rate of 160 gpm with a minimum free chlorine residual of 2.71 mg/L. Please specify the chlorine to ammonia ratio objective that optimizes monochloramine formation and limits dichloramines and trichloramines. The system has proposed to monitor total chlorine prior to the ammonium sulfate feed and pace the ammonium dose based on the total chlorine concentration. However, as indicated in Item No. 5.a. above, the free chlorine must be measured at this point, which would require an

Mr. Radabaugh
Integra Engineering

August 9, 2010
Page 3

additional chlorine analyzer. In addition, monitoring total chlorine and total ammonia following the point of ammonia injection is recommended to verify the desired chlorine to ammonia ratio is achieved.

6. Item 1.1.4 of the Design Criteria states that an analysis of the stability of the water should be performed with respect to control of lead and copper concentrations in the distribution system and Item 1.3.12 of the Design Criteria requires that the design calculation contain information regarding treatment for conformance to maximum contaminant levels (MCLs). A change in disinfectants will result in a change in distribution system water chemistry. Please provide an evaluation of potential impacts to the distribution which may include increased corrosivity, nitrification, etc. and how the system intends to respond to such potential effects through additional treatment and/or operations.
7. In accordance with 1.3.18 of the Design Criteria, storage and safety details for chemical handling must be submitted. Based on drawing no. M-10 in the engineering report, the sodium hypochlorite drum and proposed ammonium sulfate drum will be stored in close proximity in the chemical storage area. While a material safety data sheet (MSDS) was not provided for the proposed ammonium sulfate solution, the Division consulted other MSDS's for ammonium sulfate that indicate ammonium sulfate is incompatible with sodium hypochlorite. Please address storage compatibility concerns of these chemicals. In addition, ammonium sulfate may release vapors. Please specify how vapors will be controlled or mitigated.

If you have any questions, please contact me by telephone at (303) 692-3567 or by email at kelsey.baertschi@state.co.us.

Sincerely,



Kelsey Baertschi, P.E.
Engineering Section
Water Quality Control Division
Colorado Department of Public Health and Environment

cc: Scott Monroe, 1086 Kenosha Drive, Larkspur, CO 80118
Hope Dalton, Tri-County Health Department
DW File

cc: Bret Icanogle, Denver Field Unit Manager, WQCD
Paul Kim, District Engineer, WQCD